

**REPORT BY LINK SUPPORT SERVICES (UK) LTD
TO BISHOP'S TACHBROOK PARISH COUNCIL: RELATING TO**

**(A) APPROVAL BY WARWICK DISTRICT COUNCIL (EXECUTIVE)
TO 'CARRY OUT A CONSULTATION ON A PREFERRED
OPTIONS FOR SITES PAPER' REGARDING THE PROVISION
OF GYPSY AND TRAVELLER SITES AND
(B) TO CONSIDER OTHER POTENTIAL 'ALTERNATIVE' (NON
PREFERRED) SITES**

'PREFERRED SITES' CONSIDERED IN THIS REPORT:

GTalt01 – 'Brookside Willows Caravan Park', Banbury Road: up to 10 pitches proposed

GT15 Land east of Europa Way: up to 5 pitches proposed

'ALTERNATIVE SITES' CONSIDERED IN THIS REPORT

GT05 Land at Tachbrook (Hill Farm) (Green rated)

GT06 Land at Park Farm/Spinney Farm (Amber rated)

2nd May 2014

Our Ref: DM6041

This report has been co-authored by:

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1. INTRODUCTION

- 1.1 Link Support Services (UK) Ltd (Link) and Tufnell Town and Country Planning have been instructed by Bishop's Tachbrook Parish Council (BTPC) to provide impartial advice regarding the current consultation opportunity afforded by Warwick District Council (WDC) to consult on a list of 'preferred' prospective traveller sites as well as consider 'alternative' sites within the Parish boundary. This report relates therefore to (and only to) the four sites listed above and are hereinafter referred to as 'preferred' sites (GTalt01 and GT15) and 'alternative' sites (GT05 and GT06).
- 1.2 The methodology used to carry an assessment of each site has included:
- Liaison with WDC and Warwickshire County Council (WCC)
 - Site visits
 - Facilitation of two community events to seek out and understand the community's views on WDC's proposals for each site
 - Liaison with landowners, neighbours and other affected individuals (site by site)
 - Assessment of other survey information and data supplied by independent experts (i.e. 2 ecology reports and 1 x Transport Assessment)
 - Assessment of each site against WDC's published (19 point) criteria and other information
- 1.3 This report has – on the instruction of BTPC – been co-authored by the Principal of Tufnell Town and Country Planning (TT&CP) who is a member of the Royal Town Planning Institute) with over 30 years' experience working in the public and private sector planning environment. TT&CP has a range of clients including those who enjoy Gypsy status.
- 1.4 Research, co-authoring and community facilitation has been provided by Mr David McGrath, Managing Director of Link Support Services (UK) Ltd.

(Link). Link is a VAT registered company, formed in 1994 and provides a range of services to Local Authorities and community groups in the UK. Services include: training for elected members and senior officers (e.g. scrutiny and community engagement) and specialist services relating to the evaluation of proposed developments – often but not exclusively involving – traveller sites.

1.5 The overall context for this report is that WDC published a report in November 2012 which shows a need for 31 permanent pitches to be provided over the life of the Local Plan (15 years), 25 within the first five years and 6 - 8 further transit pitches over the Plan period. 'Areas of search' have been selected by officers within which it is believed that there could be potential to locate a Gypsy and Traveller site, outside the Green Belt, close to the road network and within easy reach of local facilities (schools and doctors etc.) and by a "call for sites" process. The result of the Council's research was published to allow for public consultation and comment. In June 2013 a report was brought to the Executive requesting approval for officers to undertake public consultation on Gypsy and Traveller Site options alongside that of the Revised Development Strategy of the Local Plan. The Report was approved and the consultation was subsequently carried out between the 14th of June and the 29th of July 2013.

1.6 WDC is now consulting widely on their revised development strategy which includes 'preferred' site options for new Gypsy and Traveller sites. This will ultimately inform the publication of a Development Plan Document (DPD) which will be a discrete element of the Local Plan with its own timetable and distinct stages. Prior to the publication of the DPD, WDC will undertake a 'soundness' consultation (anticipated later this year).

- 1.7 With regards to travelling showpeople, the recent GTAA has shown that provision already exists in the district (meeting current and future needs) so no new pitches are required within the life of the Local Plan.

2. SOURCES AND ACKNOWLEDGEMENTS

2.1 **Document sources and acknowledgements:** There are a number of documents that we will refer to in this report. These include (and are annotated as such throughout the report):

I. WDC Sustainability Appraisal of gypsy and traveller sites (Enfusion Report February 2014).

http://www.warwickdc.gov.uk/download/downloads/id/1711/sustainability_appraisal_of_gypsy_and_traveller_site_options

II. WDC gypsy and traveller site assessments.

http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments

III. WDC Executive meeting agenda and reports 12th Feb 2014 (Item 10 and appendices – Preferred Options for Sites Consultation).

http://www.warwickdc.gov.uk/info/20416/evidence_base/733/gypsy_and_traveller_site_allocations

IV. WDC Gypsy and Traveller Sites Habitat Assessment (shown below in section 13 – abridged to include only the sites referred to in this report).

V. Local Plan: ‘Sites for Gypsies and Travellers Preferred Options for Sites’ (WDC Report March 2014).

https://www.warwickdc.gov.uk/download/downloads/id/1707/gypsy_and_traveller_sites_-_preferred_options_consultation_document

VI. Warwick District Local Plan 2011-29 Publication Draft.

<https://estates3.warwickdc.gov.uk/CMIS/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=d5eljXkJgDoyx1nKzSB%2fgy%2bTxOh2cDSrskvKOJz%2b8K2W3DVG0hr3Gg%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNih225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJF55vVA%3d&FgPIIEJYlotS%2bYGoBi5olA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJ>

- VII. Two preliminary ecological appraisals by ‘Swift Ecology’.**
Attached as Appendix A (GT15) & B (GT05).
- VIII. One transport and highways assessment by Systra Ltd**
(Regarding site GT05). Attached as Appendix C.
- IX. Various Planning Application** and appeals decision information
where this is relevant to specific sites or the assessment process.
- X. National and local Government guidance sources** relevant to
the provision of Gypsy and Traveller Sites i.e. National Planning
Policy Framework (NPPF), Planning Policy for Traveller Sites,
Department for Communities and Local Government, March 2012
(PPfTS) and WDC local policy.
- XI Designing Gypsy and Traveller Sites, Good Practice Guide,
DCLG (May 2008).**
- <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>
- XII Potential Gypsy and Traveller Sites and ‘areas of search’
Highway Authority Response** (abridged, shown in Section 14
below to include only the sites referred to within this report).
- XIII Response by WDC to Link Support Services (UK) Ltd questions**
regarding 4 prospective traveller sites – April 3rd 2014. Shown in
section 12 below.
- XIV Miscellaneous reports, documents and emails** received from
WDC and WCC regarding our enquiries.

2.2 **Acknowledgement.** We would like to express our thanks to **officers at Warwick District Council and Warwickshire County Council** who have responded promptly to our various requests for information.

2.3 **Acknowledgement.** We would also like to **thank Bishop's Tachbrook Parish Council** whose dedication to the principles of community inclusion has ensured that the local community have engaged positively and proactively with this important consultation process.

2.4 **Acknowledgement.** Our thanks too are extended to the many **residents** who have taken an active part in this consultation process organised by WDC and BTPC – and for their views and suggestions.

Pictures below: *Local residents attending the daytime and evening 'drop in' consultation event organised by Bishop's Tachbrook Parish Council (15th April 2014)*



Pictured below: *Well attended public consultation meeting facilitated by the Chairman of BTPC and David McGrath (shown) of Link Support Services (UK) Ltd (15th March 2014)*



<p>3. 'BROOKSIDE WILLOWS': SUMMARY OF CONCLUSIONS RELATING TO GTalt01 ('PREFERRED SITE')</p>

3.0 Based on our 'site by site' assessment of this 'preferred option' we make the following comments and recommendations:

3.1 The WDC sustainability appraisal highlights those factors which carry positive, negative and neutral weight in relation to this site ('I' pages 29-31).

3.2 Through careful consideration of these (and other) factors it is evident that this 'preferred site' site **has significant potential to become site for gypsies and/or travellers** given that it has extant planning permission for purposes which are not dissimilar to the proposed use. Planning Application W2008/1528 granted use for 'Change of use to touring caravan site and erection of associated buildings (part retrospective application)'. This use was supported (with condition) by both BTPC and the Warwick Society. The site has good (recently installed) access suitable for caravans and other large vehicles and from discussions with many local residents there is a widespread (though not unanimous) view that this is a locally 'preferred' option.

3.3 BTPC is however cautioned to seek detailed reassurances from WDC – that a number of key issues are addressed relating to:

- (a) Contamination
- (b) Flood risk
- (c) Ecological protection
- (d) Sustainability (there being '*poor access to public transport and no suitable path along the A425 for walking*' ('I': Sustainability Assessment page 30).
- (e) 'Historic setting'

Are thoroughly assessed and balanced.

Detailed information is required from WDC and any prospective developer (an early stage) to justify continued inclusion as a 'preferred site' and/or in the event that any Planning Application is brought forward. This will provide confidence to all parties (including an Inspector at Examination in Public and any prospective developer) regarding the viability and deliverability of the site.

3.4 Site expansion concerns. Given sensitive 'historical setting' factors associated with the site's environs BTPC should also seek reassurances from WDC that any support for residential use of this site should **not** be seen as a 'green light' for further urbanisation and extend beyond the current site boundaries. This is important to preserve the openness and historic countryside otherwise enjoyed around this site – particularly given that 'Banbury Road is also part of the *'historic green approach to Warwick, culminating at the Castle Bridge'* (Warwick Society). Currently, it is our view that the issue of 'setting' has not been resolved satisfactorily but that it may be capable of being resolved given that similar issues were successfully addressed in the previous planning application.

3.5 Should the owner of the site be minded to sell the site - or operate the site for traveller site purposes - it would therefore seem to offer a potential solution to deliver some pitch provision in the District i.e. up to a maximum of 10.

3.6 Delivering this site in the short to medium term would no doubt rely on the owner, WDC and perhaps a third party - such as a specialist Housing Association provider – being able to agree terms to acquire, develop, deliver and maintain the site to high standards, securing in the process the necessary permissions. Failure to achieve this will significantly undermine the deliverability of the site – particularly if a lengthy process of compulsory purchase is embarked upon by WDC.

3.7 Feedback from residents at two local consultation meetings indicated that this was generally (although not unanimously) a locally 'preferred' option given the similarity in proposed use. Residents also expressed the belief that if the site was owned and managed by a specialist Housing Association there would be greater levels of accountability, transparency and effectiveness to ensure that:

- (a) Planning permissions would be implemented in a timely way - given lengthy delays associated with the current site and that
- (b) Complex issues such as contamination monitoring and sensitive environmental protection would be better managed.

3.8 BTPC is therefore recommended to welcome further discussions by WDC, the owner 'et al' regarding the future potential use of GTalt01 as a traveller site (with conditions) and request information relating to issues described above. We also recommend that BTPC offer further opinion on this site:

- (a) In the event that the site progresses to the draft submission stage (whereupon a further round of consultation will be launched by WDC).
- (b) At any 'Examination in Public' phase of consideration by a Planning Inspector (should the site be taken forward).
- (c) In the event that any new planning applications are brought forward for change of use.

4. **'LAND EAST OF EUROPA WAY': SUMMARY OF CONCLUSIONS RELATING TO GT15 ('PREFERRED SITE')**

4.1 The WDC sustainability appraisal highlights those factors which carry positive, negative and neutral weight in relation to this site ('I' pages 23-25).

4.2 Through careful consideration of these (and other) factors it is evident that although this 'preferred site' is 'available' (for transfer from WCC to WDC on request and thereafter for sale to a prospective developer) there are other factors which **weigh significantly against** its suitability and viability as a traveller site.

4.3 WDC's site assessment flags up three key 'negatives' (sustainability, financial viability and environmental concerns) which carry significant weight against the proposal. WDC state that the site is:

*'Unlikely to be able to connect to public foul mains sewer and would need non-mains solution. Nearest water body for discharge of treated sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment. In order to provide an electricity supply some High Voltage network would need to be constructed before Low Voltage supply could be provided. This will be expensive and may make the site unviable for the number of pitches which could be accommodated' ('ii' **Site assessment report WDC website – GT15 site description section 4 'infrastructure requirements'**)*

4.4 From our site visits we are also concerned as to whether the site is suitable from a **Highways perspective**, whether it is **financially viable** for a private developer and whether it can satisfy many of the best practice guidance requirements involved in **designing and implementing traveller sites** ('XI'). This is principally due to:

- (a) **Highways safety and traffic flow concerns.** Although visibility splays for access may be achievable for vehicles exiting the site, we

are concerned about the potentially negative impact **on road safety** and **traffic flows** of vehicles (potentially large slow moving) turning right onto the site from the busy road without the safety of a dedicated right turn lane. This section of Europa Way appears to be too narrow to install a safety/ right turn lane without major capital reinvestment/ road widening.

- (b) **'Access' issues into and around the site** (for large towed vehicles, emergency vehicles) given the relatively steep slope down to the site, small size of the site and the costs of levelling/ terracing required to achieve suitable access gradients and level terrain for site trailers. As an aside, ('X1') 'Designing Gypsy and Traveller sites) recommends that:

'To increase potential access points for emergency vehicles, more than one access route into the site is recommended. Where possible, site roads should be designed to allow two vehicles to pass each other (minimum 5.5m₈). Specific guidance should be sought from the local fire authority for each site' (4.29).

- (c) The impact of the **generally sloping terrain on occupants** with mobility difficulties and whether this topographical issue would permit easy use of wheelchairs, mobility scooters, pushchairs etc.
- (d) **The intrinsic ecological merit of the site and its wider significance within the 'green infrastructure' of the District** (being hydrologically linked to the River Avon). See site assessment comments below and an independent ecological report attached (Appendix A).
- (e) **Other ecological constraints** (in construction and during occupation and the need for buffer zones which would further reduce the size of the site).
- (f) The potential need for the **site to be reduced** (flood protection/ ecology conservation) to satisfy all of the above requirements and therefore increase the risk of the site being unviable from an economic and social perspective.

- (g) **Lack of space** for visitors, overnight guests, play area, parking, paddock for horses etc. ('X')
- (h) The cost and technical requirements involved in providing for **waste disposal**.
- (i) **Unresolved issues** of potential **air, light and noise pollution, archaeological significance, flood risk** (assessment, management and mitigation).
- (j) Potential effect on the **visual amenity of nearby residents as we note that the site is visible to a farm building/ complex**.
- (k) The strong likelihood that the site would almost certainly be **car dependent**. Although the nearest bus service (route) is '554 m away', the nearest **bus stop** is some 1.2 miles away with no viable walking/ cycling routes) which further reduces site sustainability.
- (l) The **potential cumulative effects** of similar developments i.e. the site is in '*close proximity to three other proposed Gypsy and Traveller sites at GT05 and GT06 which could lead to cumulative effects on: sustainable transport; the need to travel; health; local services and community facilities; landscape*' (**'I' Sustainability Appraisal Page 23**) It is however recognised that this factor will reduce in significance if some of these potential sites do not progress to fulfilment.

4.5 WCC (Highways) has provided comments to WDC regarding another potential site in Europa Way (GTalt 05 West of Europa Way) and concludes that:

'Europa Way serves a high volume of traffic, where accident rates are high therefore; this site is not suitable to serve caravans'. (See Section 14 Page 117 below)

4.6 It is possible that under proposals in the Draft Local Plan (V1 T38/39) that the Europa Way Corridor will become a dual carriage way. This outcome is – as yet – by no means certain - however it may pose additional challenges for the location of a Gypsy and/or traveller site at this location. These could be:

- Higher vehicle speeds (from new raised speed limits and potentially faster speeds driven by motorists on a dual carriage way.
- Need for revised visibility splays and whether they can be achieved.
- Potentially greater impacts on site occupants (noise and air quality)
- Large costs and questions over the viability of installing a major right turn lane to allow access to the site for a very small site.
- Potential accident risk if no right turn junction installed and
- Consequently longer journeys if the site can only be accessed from one direction

4.7 Considerable **community opposition** to this site being used for residential purposes was detected at two local consultation events. Members of the public felt strongly that the site should continue as undisturbed and undeveloped woodland and that the site made a positive 'green' contribution to the area – particularly in view of general development pressures – were concerned about road safety and the potential erosion of green space and wildlife habitats.

4.8 Community members also felt that it was possible that a development at this site would also impact on visual amenity in relation to views from the **country park proposed** by WDC in the draft local plan (V1 appendix 2 map 2)

4.9 Whilst some detail can be left to the planning application stage it is important that the plan and assessment process is suitably informed so that sites intended to be allocated can be so allocated with the confidence that there are no material planning harms, or that identified harms can be satisfactorily mitigated.

4.10 Our report concludes that:

- (a) The negatives associated with this site clearly outweigh the potential benefits.
- (b) It is unlikely that this site will be viable for the stated purposes.
- (c) That BTPC should **object to site GT15 for further consideration as a Gypsy or traveller site and**
- (d) **BTPC should make representations to WDC accordingly** for the reasons given above.

<p>5. 'HILL FARM' TACHBROOK (SUMMARY OF CONCLUSIONS RELATING TO GT05 ('ALTERNATIVE SITE'))</p>

5.1 This 'alternative site' is not currently the subject of formal consultation and by definition is (a) considered to meet a fewer number of WDC's assessment criteria at this point in time and is (b) not suitable for public consultation at this point owing to the absence of information which is still awaited – and which needs to be assessed.

5.2 However it is likely that:

- the site may be considered further **if** other sites prove to be unacceptable or unviable and pitch provision cannot be achieved from the remaining 'preferred' list sites
- the continued unresolved status of this site will cause concern and blight to both the land/landowner and local community.

5.3 We have therefore been instructed by BTPC to consider this site as a potential traveller site based on available information (including two independent technical reports relating to ecology and Highways) and

- (a) gauge local community feeling through the BTPC engagement events
- (b) understand the owners perspective on the possible use of the site for these purposes (as this affects availability and deliverability) and
- (c) advise BTPC of an appropriate response to WDC in advance of their further potential consideration of the site

5.4 A detailed assessment of this '*alternative*' site is contained within this report but in summary we conclude:

5.5 This site is **not available** – unless by compulsory purchase (CP) and the acquisition of the site by these or other means is strongly opposed by the owners. CP is an extremely lengthy and costly process without a

guaranteed outcome. There is therefore a very uncertain prospect of the site being deliverable. The owners of the land and their agent have verbally communicated their strong opposition to us regarding these potential proposals and are making separate representations to WDC.

5.6 With regards to the creation of vehicular access to the site, an independent Transport report commissioned by BTPC offers the following conclusions:

5.5 Recommendation

5.5.1 The layout of the A452 adjacent to the site and the existing accident record of junctions along the A452 in the vicinity of the site, indicate that a safe access to a travellers site at Hill Farm cannot be achieved and any new junction would worsen an already poor safety record along this section of highway.

5.5.2 The site is also poorly located in terms of access by non-car modes with pedestrian safe access to the site difficult to achieve.

5.5.3 Therefore this site is not suitable for the provision of a travellers' site in terms of highway safety and accessibility and Warwick District Council may wish to remove it from their list of potentially viable alternative traveller sites based on these factors.

(Appendix C page 29)

5.7 **Policy DP6** of the Warwick District Local Plan 1996 - 2011 states that development will only be permitted which provides safe and convenient access and where development can demonstrate that it does not cause harm to highway safety. Our report questions whether it is possible for a development 'north west of the site' to achieve this objective without major infrastructure investment.

5.8 **Policy TR1** of the published draft Local Plan identifies that

'Development proposals will be expected to demonstrate that they:
a) are not detrimental to highway safety;

b) are designed to provide suitable access and circulation for a range of transport modes including pedestrians, cyclists and public transport services; ('V1 page 113)

5.9 WDC Highways acknowledges that **access via the only other road (Mallory Rd) is 'not recommended'**. (Section 14 below)

5.10 The inability to construct safe access is in itself (a) justifiable reason to reject this site from further consideration and (b) a reason why this site could fail the test of 'soundness' at Examination in public by an inspector. A recent traveller site appeal decision (where all other factors – 'for' and 'against' the site – balanced equally against each other) was **dismissed** on Highway safety grounds. The Inspector (and Secretary of State) concluded that *'withholding permission for the families to live on the site is necessary to overcome the identified threat to public safety and to minimise the risk of an accident and personal injury'* (Appeal decision Nov 2013 APP/Q4625/A/13/2195328 – Eaves Green Lane Meriden Solihull)

5.11 The Transport Report also examined this prospective site in terms of access to local services through sustainable means of transport (and other services further afield) and concludes:

'Overall, the site is not in a sustainable location in terms of access to local amenities and also the use of non-car modes and the majority of trips associated with the Travellers site will be via private car to locations outside of the immediate area'. (Appendix C 5.4.4)

5.12 Although the report notes the presence of a Public Right of Way at Hill Farm to the village it concludes:

'There is a Public Right of Way (W106), which traverses the site between Bishop's Tachbrook and Banbury Road. This route is currently unpaved and unlit, would be potentially impassable during periods of harsh weather and would not therefore provide suitable access and egress as an all year round route to and from the village. This route will also prove to be problematic or unviable for young children, mothers with push chairs and people of all ages with mobility difficulties'

5.13 Given that this site represents part of a rural buffer zone between the Banbury Rd and the village – with clear views across the fields from Mallory Rd, any development at this prominent location (whether with business use or not) would cause an **adverse impact on the visual amenity and character of the countryside**. This report concludes therefore that the development of this site would be **contrary to WDC’s Policy DP1**, since it would not positively contribute to the character or quality of its environment, and would also be **contrary to Policy DP3** by failing to protect and enhance the landscape character of the area.

5.14 The base use of the land is **agricultural and it is previously undeveloped land (which is a negative factor in terms of government policy)**.

5.15 WDC recently (Feb 2014) refused an application for housing in close by fields (PA W/13/1688). Of particular relevance are the comments on page 11 of the Committee report which states that

The visual impact of development on the site upon the wider landscape was considered independently by Warwickshire County Council in their "Landscape Sensitivity and Ecological & Geological Study", as part of the supporting evidence base for the Council's Village Options. This assessed the landscape sensitivity to housing development as High, stating that the existing settlement edge is very prominent and further development would exacerbate this and erode the rural character of the zone and setting of the Tachbrook Hill Farm Listed Building. Development on higher ground would be particularly visible and should be avoided, and tree belts/hedge lines should be improved....."

<http://planningdocuments.warwickdc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal= WARWI DCAPR 69504>

Given that the landscape sensitivity to housing is 'high' it is felt that other forms for housing will also adversely affect this this sensitivity.

5.16 An independent ecological report (attached at appendix B) also notes the likely **negative effect** of creating vehicular access from the Banbury Rd on some of the most ecologically valuable parts of the site (i.e. **mature oak trees** or the **semi-natural woodland** along the western boundary which is '*indicative of the historic landscape pre-dating its use for agriculture*'). The dominant Oaks undoubtedly contribute to the visual amenity and countryside character and should be protected. The construction of a vehicle access (wide enough to provide for use by trailers etc.) close to a tree (or trees) may also be undesirable due to the known intolerance to this species, and water and nutrient competition from the adjacent woodland.

5.17 The identification of this site – even as an 'alternative site' - has caused the greatest level of **community concern** which is united in its opposition to the development of this prospective site (evident at our facilitated public meeting and separate drop in event). The local community has (with strong justification) concerns about **Highways safety** – and in some cases knowledge of incidents, accidents and fatalities along this stretch of road. The community also raised with us the point that there are **no safe walking routes from the site to the village (being without a formalised footway or street-lighting) and the impact on the countryside**. The continued categorisation of GT05 as a potential site (with unresolved status) is causing great concern in the community.

5.18 Following one of our local public meetings a resident wrote to us regarding the devastating effect on her and her family following a fatal road collision at the site junction (Mallory Rd/ Banbury Rd). Her note is reproduced with her permission:

I would like to strongly object to this proposed site as the road junction is extremely dangerous as I can personally testify to as my father was killed

in a car accident at that site on 30 November 1992. The accident happened on a day when the weather conditions were poor with heavy driving rain and when the driver of dad.'s car turned right onto the Banbury Road. The car going down the hill had no way of avoiding them and smashed right into Dad in the passenger seat in the front of the car. As you can imagine our family was devastated at the early death of a much loved husband and father. I would not want any other family to go through such an horrendous experience.

Any plans to increase the numbers of cars, lorries and caravans which need to use this junction should not proceed as this can only increase the number of serious accidents at this black spot.

Regards Carol Wheatley

5.19 Our site assessment comments (below) also raises a number of other concerns which weigh against this site's continued inclusion as an 'alternative' site. These include:

- **Negative impact on the farm owner's business.**
- The negative impact of the development causing the **loss of productive agricultural land.**
- **Negative impact on the residential amenity of the current land owners** (causing unacceptable loss of outlook and possibly privacy).
- Potential **archaeological value** of the site (comments awaited).
- Potential impact of **traffic noise** on site residents.
- Whether the larger area of the site would be used – or acceptable to WDC for traveller related **business purposes** (storage of building materials or plant and equipment, storage of scrap metal or scrap processing etc.)
- Negative impact on the enjoyment of users of an existing Public Right of Way (W106), which traverses east-to-west through the site between the residential area and Banbury Road. This route is unpaved and unlit.



(Source – documentation associated with p.a W/13/1688)

5.20 Given the significant known ‘negatives’, lack of information, uncertainties and community concern surrounding this site we would **recommend that BTPC should:**

- (a) reject this site** as a potential residential traveller site and
- (b) make representations to WDC to remove this site from further consideration for the reasons identified above.**

6. 'PARK FARM/ SPINNEY FARM' (SUMMARY OF CONCLUSIONS RELATING TO GT06 'ALTERNATIVE SITE')
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6.1 This is an 'amber' rated site which means that it is '*possibly suitable depending on a number of factors such as information still to be received and assessed*' (V). There is therefore (by definition) less confidence that a site is suitable in principal without the provision of information '*still to be received an assessed*' (V).

6.2 As with GT05, this 'alternative site' is not currently the subject of formal consultation and by definition is (a) considered to meet a fewer number of WDC's assessment criteria at this point in time and is (b) not suitable for public consultation at this point owing to the absence of information which is still awaited – and which needs to be assessed.

6.3 However it is the case that:

- the site may be considered further by WDC if other sites prove to be unsuitable/unviable and
- the continued unresolved status of this site will cause concern to both the landowner and local community

6.4 We have therefore been instructed by BTPC to consider this site as a potential traveller site based on available information and

- (a) gauge local community feeling through the BTPC engagement events
- (b) understand the owner's perspective on the possible use of the site for these purposes (as this affects availability and deliverability)
- (c) advise BTPC of an appropriate response to WDC in advance of their further potential consideration of the site

6.5 A detailed assessment of this alternative site is contained within this report but in summary we conclude:

6.6 This site is **not available** – unless by compulsory purchase (CP) and the acquisition of the site by these or other means is strongly opposed by the owners. CP is an extremely lengthy and costly process without a guaranteed outcome. There is therefore a very uncertain prospect of the site being deliverable.

6.7 The base use of the land is agricultural and it is (in part) previously undeveloped land. There would therefore be an unacceptable impact on the visual amenity and character of the countryside. This impact could be heightened by the creation of any new vehicular access i.e. *'If a new access is to be created it is unlikely that an access could be created any closer to the existing roundabout without the requirement for removal of hedgerow/trees'*. (See Highways Report comments shown in section 14)

6.8 There is also an absence of Highway safety information regarding access and the implications for Highways Safety and traffic flow on the creation of a new access and the type and volume of traffic likely to frequent this site.

6.9 The owner of the farm building will not consent to the existing access being used for the potential stated purpose. This is in addition to the – different – owner of the land being opposed to the use of his land for residential development). These twin objections constitute:

- *materially relevant factors which undermine the viability of the site and*
- *undermine the prospects of the site being available and deliverable in the short term without resort to lengthy and costly legal recourse.*

6.10 WDC also flags up issues in its own assessment which – as yet – remain unresolved i.e.

- (a) Land contamination
- (b) Noise from Warwick by pass

- (c) Possible problems to viable agricultural unit and
- (d) Proximity to Grade 1 Listed Park and Garden at Castle Park)

6.11 As with GTalt01, WDC needs to address the issue of how any proposed development (with or without potential business use) would affect the historical 'setting' of the site (Park and Garden at Castle Park). The National Planning Policy Framework is helpful in this respect as setting is defined in annex 2 of the NPPF as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

(Significance for heritage policies is also defined in annex 2 of the NPPF).

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical present, but also from its setting' ('X')

6.12 We note:

- (a) the designated status of the said heritage assets
- (b) the acknowledged lack of information regarding an assessment of its significance
- (c) the lack of information regarding the impact of any proposals on the 'setting' and whether mitigation measures as required are deliverable

We therefore conclude that this 'alternative' site currently fails to comply with this national policy requirement. There is also no prior approval relating to this site to rely upon on (unlike GTalt01) to suggest at this stage that this issue can be successfully addressed.

6.13 It is likely that the site would be car dependent without good local access to key services (which crucially reduces its sustainability).

6.14 Our appraisal at this point in the process concludes therefore that:

(a) The site has characteristics which render it **unsustainable** as a residential traveller site with '**major negatives**' weighing against it which are unlikely to be resolved.

(b) There is not enough information to support the contention that this site is viable, deliverable or 'sound' and

(c) There are large gaps in knowledge and information leaving the issues that WDC, local residents and this report have identified unresolved

6.15 It is therefore recommended that BTPC **reject** this site as an 'alternative' site and liaises with WDC to request its withdrawal from further consideration as a potential traveller site.

7. SITE ASSESSMENT CRITERIA

7.1 WDC has published the criteria by which it has assessed each site. This includes 10 criteria *'by which consultees were asked to consider their choices of sites to promote to the next stage'*

7.2 WDC recognises that a greater level of assessment is required to be able to graduate sites to preferred option status. *'In addition.....to ensure that all environmental factors are taken into account when reducing the list of sites to 'preferred option' for further consultation.....The assessment of sites has therefore been undertaken using the following 19 headings' ('V')*

- 1 Landscape character
- 2 Nature conservation designation
- 3 Historical designation
- 4 Infrastructure requirements
- 5 Ecology
- 6 Flooding
- 7 Contamination and other constraints
- 8 Agricultural land quality
- 9 How visible and open in character is the site?
- 10 Can the site be visually screened adequately?
- 11 Is the site close to other residential property?
- 12 How far away is the primary road network?
- 13 Distance to GP surgeries, schools, dentists, hospitals, shops, community facilities?
- 14 Is the potential site on previously developed land?
- 15 Access issues
- 16 Level site
- 17 Suitable size
- 18 Availability
- 19 Deliverability

7.3 In order to assist BTPC with its response to these sites as potential Gypsy and/or traveller sites we have commented on all of these categories on all sites irrespective of their 'preferred' or 'alternative' status. We have also alluded to those factors published by WDC which weigh for or against the proposal (or are neutral).

8. 'Brookside Willows' (Gtalt01) SITE ASSESSMENT

8.1 In the Local Plan document '*Sites for Gypsies and Travellers March 14*' (V), WDC summarises its reasons for including GTalt01 as a 'preferred site' for the following reasons

This site is not in the Green Belt. The site already has an extant planning permission for a holiday caravan site. It is located close to the edge of the urban area but well screened from the road. A new access has recently been created with a turning lane from Banbury Road to highway standards for a caravan park. Several local watercourses drain close to the site, but the water runs into the road rather than onto the site. Although a landfill site in the past, some research has been carried out in connection with the existing planning permission to identify the contaminants and planning conditions were attached to the permission to deal with these issues. This use is very similar to that proposed and if designed properly with the right approach to ventilation and erection of fixed buildings on floating slabs, the site could be developed for permanent use. There is pedestrian access along the roadside and it is close to the primary road network. If the site is developed it is recommended that a buffer should be retained with a wildlife corridor along the Tach Brook. Whilst opposite Castle Park, the site is set back, has a narrow frontage and is well screened from the road by an established tree belt which has been at this location for a long period of time and is part of the street scene. If necessary, this tree belt could be added to as part of a landscaping scheme at the time of a planning application. The principle of locating caravans here has been established by the extant planning permission. Schools are located in the south of Warwick and three new schools are to be delivered as part of the housing allocations in the Draft Local Plan. Places will be available here for children in this area.

8.2 Our assessment of the site is as follows:

8.2.1 Landscape character

This is a former landfill site which has seen gradual development towards its permitted use over a number of years. The site is not operational but it is believed that the owner wishes to bring the site into use in 2015 for caravanning and camping purposes.

Comment: Policy H of the Planning Policy for Traveller Sites provides guidance on the assessment of planning applications for traveller sites. Paragraph 24 encourages local planning authorities to attach weight

to 'The effective use of previously developed (brownfield), untidy or derelict land'. GTalt01 **does** correlate to one or more of the descriptions contained within Policy H which adds weight to its 'preferred' status.

8.2.2 Nature conservation designation

'The Tach Brook (G2) runs along the northern section of the site which separates it from Turnbulls Garden which is classified as a broad-leaved plantation Turnbulls Garden is noted as a potential Local Wildlife Sites (pLWS SP26W3).

Tach Brook is part of the arterial network of tributaries and wildlife corridors which are an intrinsic feature of the River Avon itself and is part of the Avon LWS designated area (LWS SP15Li8f). (Warwick District Gypsy and Traveller Sites Habitat Assessment page 15)'

Comment: The site has an important role within the wider ecological and biodiversity setting of the area. This factor weighs against the site in terms of any strategic sustainability appraisal as required at draft submission stage. This weight would however be reduced (acknowledging the lawful use of the site and) dependent on the design and effectiveness of mitigation strategies alluded to in the report Habitat assessment report below in section 13:

'If the site is developed it is recommended that a buffer should be retained with a wildlife corridor along the Tach Brook.'

8.2.3 Historical designation

'Fieldsapes. Very large post war fields/Woodland, broad leaved plantation' (II WDC site assessment comments GT15)

8.2.4 Infrastructure requirements

'This use is very similar to that proposed and if designed properly with the right approach to ventilation and erection of fixed buildings on floating slabs, the site could be developed for permanent use' (WDC comments above)

'It is unlikely that the site could connect to public foul mains sewer and would need a non-mains solution' WDC email 3rd April 2014

Comment: It would be helpful for BTPC to clarify with WDC all potential infrastructure requirements (including land re-levelling) so that feasibility and cost benefit calculations could be assessed. This should certainly be done prior to the site becoming a shortlisted site at the draft submission stage. Further information regarding the supply of electricity, gas, and waste disposal facilities are required (as a long term residentially occupied site) if this site is to remain a 'preferred' site. Such information would give confidence to BTPC, WDC, the Inspector at 'Examination in Public' and any prospective developer that the site is deliverable.

8.2.5 Ecology

'The areas around the site consist of a mosaic of highly distinctive habitats, including semi-natural woodland, semi-natural and marshy grassland, ponds and streams. Turnbolls Garden pLWS should be surveyed as a Local Wildlife Site which should incorporate the area of pools and semi-natural grassland along the Tack Brook. The site, if developed should retain a buffer and wildlife corridor along the Tack Brook'. (Warwick District Gypsy and Traveller Sites Habitat Assessment page Section 13 below page 20)'

Comment: Protected species are known to exist in the area. During the Planning Application process of 2009 it was noted in a reptile survey carried out by an ecologist acting for the applicant that:

The County Ecologist reported that Grass Snake had been recorded in 2003 from the adjacent marshy area to the east and an Adder recorded from the adjacent field to the south. As the site has habitat suitable for reptiles a pre-determinative reptile survey was requested prior to planning permission being determined.

In terms of the context of the site it was noted that:

The site lies within a mosaic of wetland, woodland and arable habitats. Immediately to the east of the site is ecosite 08/36 (Marsh along Tach Brook) which includes two ponds. The Tach Brook watercourse borders the site to the north. Beyond the Tach Brook to the north and beyond the Banbury Road to the west is a large area of woodland, ecosite 120/26 (Warwick Castle Park). Within this wooded area is a large water body called New Waters. To the south of the site is a large arable field, which also holds a large pond.

http://planningdocuments.warwickdc.gov.uk/online-applications/files/F710B50D18B04DD6CA43CF28A44F4664/pdf/W_09_0909-REPTILE_SURVEY-166940.pdf

Warwickshire County Council in their ecological appraisal of the site and its environs also note that records of **protected species exist in the area namely grass snakes, adder, bats and water vole in the surrounding area:**

http://planningdocuments.warwickdc.gov.uk/online-applications/files/4A4FE0644949DE963A77F7A4988AB0C7/W_09_0909-ECOLOGY-COMMENT-175657.doc

Comment: Although no reptiles were found during the survey period and planning permission granted, BTPC should however require further information as to the current ecological status of the site and seek appropriate independent reports. This approach is consistent with that taken by Warwickshire County Council in their ecology response to the 2009 application (see above) and BTPC should require conditions to protect and minimise the impact on local bio-diversity and protected species.

Comment: We agree that site has an important role within the wider ecological and biodiversity setting of the area (see above) and that the provision of a broad buffer zone and wildlife zone is feasible and would provide a useful mitigation approach to protect and preserve valuable ecology and biodiversity around the perimeter of the site.

8.2.6 Flooding

Comment: Flood risk. During the Planning Application process of 2009 (to secure permission for use of the site as a leisure caravan park) it was noted in the applicants flood risk assessment that

The whole site is located in flood zones 1, 2 and 3 (Appendix A), however the plateau of the mound and lower lying western area, which is where the development is proposed, is located in flood zone 1. This proposal, if approved, will create 'more vulnerable' and 'highly vulnerable' uses of land as designated in Table D.2 of PPS25. These risk categories are appropriate for a development in flood zone 1. The total area of the site to be developed is greater than 1 hectare and therefore a flood risk assessment is required without sequential or exception test in accordance with PPS25.

WDC has confirmed that *'The Environment Agency's flood map shows that there is potential flooding to the north and along part to the south of the site. Tach Brook runs along the northern boundary. However, the site itself is on higher land and is not in flood zones 2 or 3 (email 3rd April 2014)*

This may well alleviate concerns regarding flooding and a more detailed assessment may well be undertaken at any planning application phase and BTPC may wish to offer a view on this at the appropriate point in time.

8.2.7 Contamination and other constraints

This is a former landfill site and there are known contamination issues on the site. It is a gassing landfill site which was filled between 1971 and 1990.

'Although a landfill site in the past, some research has been carried out in connection with the existing planning permission to identify the contaminants and planning conditions were attached to the permission to deal with these issues'.
WDC comments above

Relevant documents can be found attached to the previous planning application for a holiday caravan park and can be found here:

http://planningdocuments.warwickdc.gov.uk/online/applications/applicationDetails.do?activeTab=documents&keyVal=_WARDAPR_59086
(WDC email 3rd of April 2014)

Comment: Published documentation suggests that ‘planning conditions on the existing permission deal with issues of contamination’ (V page 23). BTPC may wish to seek confirmation that (a) such conditions are relevant to a fully occupied residential site (b) the likely ‘venting and monitoring’ requirements of site for occupational use and (c) the best way of achieving the potentially complex site (and health) monitoring requirements – particularly given that the site might be populated with a number of highly vulnerable people. WDC may also wish to comment on whether the management of this site and these issues should be located within an accountable structure of governance (e.g. specialist Housing Association provider).

Comment: Design guidance. Planning Policy for Traveller Sites – Department for Communities and Local Government 2012 (PPfTS) states that when assessing sites in a rural or semi-rural setting, site development must accord with the design principals and specific issues contained in Designing Gypsy and Traveller Sites, Good Practice Guide, DCLG (May 2008). We recommend that WDC provide a clear statement or design brief for the site. This will either eliminate the site from further consideration or else provide greater confidence to WDC, an Inspector at Examination in Public or a prospective developer. Given that the site is being assessed as part of a shortlisting process we feel that this key matter should not be left to the Planning Application stage.

Comment: The relative close proximity of the site to a busy main road may give rise to increased levels of noise nuisance. The effects of **noise nuisance** on occupants sleeping in vulnerable structures (as a long term arrangement as opposed to a short holiday experience) at this site is unknown and should be investigated further (as part of the design requirements) if the site is to remain a ‘preferred’ site.

Comment: Archaeological significance. It is noted that the *'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'. (WDC email 3rd of April)*

Comment: No assessment is therefore currently available as to this facet of the site. It is probably the case however that the significant and prolonged disturbance at the site (associated with extended use as a landfill) will have reduced the archaeological value of the site.

Comment: The site may affect the setting of a listed building. The Warwick Society has previously pointed out in 2008 (whilst commenting on Planning Application W2008/1528 – Brookside Willows Ltd. Banbury Road) that

*'the boundary of the Grade 1 listed Warwick Castle Park is on the opposite side of the Banbury Road to the development and it is obligatory that the setting of the Park should not be adversely affected by it.
<http://warwicksociety.wordpress.com/planning/december-2008/>*

Comment: With regards to the development having the *'potential to affect the landscape's special character'*, It is also strongly recommended that WDC seek a detailed dialogue with BTPC, English Heritage and The Warwick Society on this matter – and at the appropriate point advertise the proposal as affecting the setting of a historic landscape. English Heritage (2 D) set out their requirements where they must be consulted in the event that a:

'Development (is) likely to affect any garden or park of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953 (register of gardens) and which is classified as Grade I or Grade II (Schedule 5 paragraph (p) of the Town and Country Planning (Development Management Procedure) (England) Order 2010)*

Comment: It is our view that WDC and English Heritage should clarify the extent to which the site affects the setting of Castle Park and be satisfied, subject to any necessary mitigation, that no harm would result.

(Ref. <http://www.english-heritage.org.uk/publications/consult-planning-listed-building-conservation-area-consent/eh-notification-checklist.pdf>)

Comment: Site expansion concerns. Although BTPC did not object to the above mentioned Planning Application it **did** express concern that controls should be in place to ensure that the site did not spread into 'fresh fields' beyond the current boundaries (see below). Related to this point BTPC may ask for WDC to clarify how they would accommodate future family growth needs on this site given flood zone restrictions. BTPC may wish to make a similar point to WDC in association with those raised here. We would however caution that in any consideration of a planning application WDC would only be able to consider the application as presented. The representations made by BTPC on the previous planning application stated:

'Owing to the 20-plus years of planning application history for this particular change of use it is not reasonable for us to demand that those policies are upheld in this instance. For the same reasons (the Rural Area Policies of the Local Plan) the council is concerned about possible future growth of the caravan park into fresh fields, and we ask the planning officer to impose conditions that inhibit the growth of the caravan park beyond the current boundary'.

http://planningdocuments.warwickdc.gov.uk/online-applications/files/2B9177619F548465E485ADBD87C805CD/W_09_0909-BISHOPS_TACHBROOK_PARISH_COUNCIL-COMMENT-172715.txt

8.2.8 Agricultural land quality

This is Grade 2 and Grade 3 agricultural land – although in practical terms it is former landfill land with associated business permissions where development is underway

Comment: Given the previous uses of the site we would caution reliance on the classification in this case.

8.2.9 How visible and open in character is the site?

'The site is set back, has a narrow frontage and is well screened from the road by an established tree belt which has been at this location for a long period of time and is part of the street scene. If necessary, this tree belt could be added to as part of a landscaping scheme at the time of a planning application.

Comment: Trees have been recently removed from the front perimeter area – increasing the openness of the site. Currently there is a long line of 'herras' steel temporary fencing along the frontage. To compensate for the loss of the trees (and avoid a prominence in the street scene/ landscape) a revised screening strategy would be required as part of a new site design layout. This is also an important facet of the site given the importance of the 'setting' of the site. We recommend that BTPC request design details from WDC/ developer as part of any conditional support for this site.

8.2.10 Can the site be visually screened adequately?

Comment: See comments in 5.5.9 above

8.2.11 Is the site close to other residential property?

'Nearest residential properties are 250m south on Banbury Road' WDC site assessment comment

Comment: There are other residential properties fairly close to the site. Dependent on the screening provision this factor has the potential to affect the visual amenity of these residents and the occupants of this site

8.2.12 How far away is the primary road network?

Banbury Road runs along the western boundary of the site and the site is close to the primary road network

8.2.13 Distance to GP surgeries, schools, dentists, hospitals, shops, community facilities?

'Schools are located in the south of Warwick and three new schools are to be delivered as part of the housing allocations in the Draft Local Plan....it is located close to the urban area' (WDC site assessment comments)

'No bus stops within recommended walking distance of 800m. 68 bus service, 800m+ ' WDC site assessment comments

Comment: Although the site is 'close to the urban area' there are only (relatively) short sections of (new) footpaths extending north and south of the site with no formalised or informal pedestrian walkways or cycle-ways further along this busy stretch of road and into Warwick. The site offers a lack of choice of modes of transport for occupants and/or visitors. The site would therefore – most likely – be car dependent. This weighs against the site in terms of sustainability.

Comment: General availability of school places. WDC has stated on various occasions that 'school places are available' or will be built as part of the local plan. Local opinion tends to disagree with the level of current provision and feels that 'local schools are full'. It may be appropriate for BTPC to discuss with Governors and others the actual picture with perhaps the provision of accurate/ transparent statistical data to be fed into the consultation process to demonstrate availability of places. Information should also be made available as to when new schools will be built and new places available as this also may affect the likely deliverability of the site

8.2.14 Is the potential site on previously developed land?

Yes

8.2.15 Access issues

'We have taken the advice of Warwickshire County Council on this issue and are therefore satisfied that the visibility splays can be achieved. Furthermore, a required access lane has been incorporated into the highway on Banbury Road by the present owners; this being a planning condition attached to the permission for use as a holiday caravan park' (WDC email 3rd of April 2014 see section 12)

Comment: This satisfies access requirements.

8.2.16 Level site?

No

Comment: We would recommend that BTPC requests a design statement for the site which addresses the issue of any issue of any site levelling requirement and access for people with mobility difficulties who occupy the site on a long term basis and to ensure that the site is well laid out and landscaped.

8.2.17 Suitable size

'Although the site has capacity for 15 pitches.....The Council has recommended a maximum of 10 pitches on this site and does not envisage more being accommodated here since the site is not large enough (WDC email 3rd Ap 2014 See section 12)

Comment: This would seem suitable due to the site's constraints. Given that the site has 'capacity for 15 pitches' it would be helpful for WDC to explain why the additional 5 pitches would not be appropriate in the event that this site was developed for residential G&T purposes.

8.2.18 Availability

Comment: The intentions of the owner (regarding the possible sale of the site or acting as a traveller site developer) are unknown and BTPC are

advised to seek clarification from the owner and/or WDC. This factor is key to understanding availability and deliverability.

8.2.19 Deliverability

'With landowner's co-operation, site could be delivered quickly provided appropriate steps taken to adhere to previous planning decision conditions regarding possible gassing' (WDC site assessment)

Comment. This is agreed. It is evident that the site performs well in many areas as a potential traveller site and indeed some residents engaged in the previous WDC consultation process nominated this site for consideration. In addition:

(a) the site has approved use for similar use to that which is proposed and

(b) BTPC did not previously object to the use as a caravan site.

For these reasons we would **recommend** that BTPC should welcome further discussion of this site as a potential traveller site to understand

- the owners position and
- whether the issues raised above can be mitigated and addressed
- WDC's view as to how the site will be developed and managed in the future (e.g. Housing Association) as this was clearly a preferred option from our local community engagement events.

9. 'Land East of Europa Way' (Gt15) SITE ASSESSMENT

9.1 In the Local Plan document '**Sites for Gypsies and Travellers March 14'** ('V'), WDC summarises its reasons for including GT15 as a 'preferred site' for the following reasons

This site is not in the Green Belt. The land belongs to Warwickshire County Council and was originally purchased to dump spoil from the excavation of the new road, now Europa Way. The land therefore slopes away from the road and is less visible because of this. In theory, it should be possible to deliver this site ahead of others as the land can be transferred easily. It is unlikely that the site could connect to public foul mains sewer and would need a non-mains solution. Access and visibility splays are achievable if some roadside vegetation is removed. The nearest school to this site is Kingsway (1.9 miles) which does have capacity. New schools built through new housing developments allocated in the Local Plan could also provide the opportunity for school places. Other existing schools are at Bishop's Tachbrook, St Margaret's and St Joseph's. A GP surgery is located at Bishop's Tachbrook (1.6 miles) and public transport provided by the 68 bus service (554m) and 77 bus service (554m).

In addition the WDC sustainability assessment identifies both the strongest feature of GT15 as a potential traveller site and also identifies 'negative' and 'neutral' factors.

'The development of the potential site is considered to lead to minor long term positive effects on SA Objectives relating to Health and Poverty & social exclusion as well as have major long term positive effects on Housing needs. The site will provide land for caravans to meet existing (and potentially additional) residential needs in the area and this will have indirect positive effects on health and well being/ poverty through providing a permanent/ semi-permanent base with good quality facilities and access to utilities. However, also in terms of effects on Health, the nearest GP services (Bishops Tachbrook) is within 1.6 miles with the site having poor access to public transport⁹⁷ leading to minor negative effects'. (I Sustainability assessment Page 23)

9.2 Our overall assessment of the site is as follows:

9.2.1 Landscape character

This is a woodland area and is classed by WDC as '*not previously developed*' (email response to questions dated 3rd of April 2014).

Comment: Policy H of the Planning Policy for Traveller Sites provides guidance on the assessment of planning applications for traveller sites. Paragraph 24 encourages local planning authorities to attach weight to ‘*The effective use of previously developed (brownfield), untidy or derelict land*’. GT15 **does not correlate** to any of these descriptions contained within Policy H which may conflict with the ‘preferred’ status of the site given that it cannot be accorded such weight in its favour.

9.2.2 Nature conservation designation

Tach Brook (G2) flows through the plantation and is a tributary of the River Avon which is a Local Wildlife Site (LWS SP15Li8f). The Tach Brook is part of the arterial network of tributaries and wildlife corridors which are an intrinsic feature of the River Avon itself and is part of the Avon LWS designated area. (‘I Warwick District Gypsy and Traveller Sites Habitat Assessment page 15’)

The site is designated as part of the non-statutory Ecosite 08/36, Marsh Along Tach Brook and the Tach Brook forms part of the River Avon LWS, as one of its tributaries (Swift ecology assessment – see Appendix A)

Comment: The site therefore has an important role within the wider ecological and biodiversity setting of the area. This factor **weighs against** the site in terms of any strategic sustainability appraisal as required at draft submission stage.

9.2.3 Historical designation

None that we are aware of although the archaeological significance of the site is unknown which in turn may affect its historical designation.

9.2.4 Infrastructure requirements

Comment: WDC’s site assessment flags up **key ‘negatives’** regarding infrastructure requirements which carry significant weight against the proposal. WDC state that the site is:

‘Unlikely to be able to connect to public foul mains sewer and would

need non-mains solution. Nearest waterbody for discharge of treated sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment. In order to provide an electricity supply some High Voltage network would need to be constructed before Low Voltage supply could be provided. This will be expensive and may make the site unviable for the number of pitches which could be accommodated' (ii Site assessment report WDC website – GT15 site description section 4 'infrastructure requirements')

9.2.5 Ecology

Comment: Notwithstanding the importance of the ecology points raised in 4.2.4 it is clear that there is merit in **preserving the site as undisturbed woodland** and protecting the site from the potentially negative effects of development:

WDC states that the

'Nearest waterbody for discharge of treated sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment'

'Given the mix of habitats in the area, including the broad-leaved woodland, mixed grassland and the watercourse makes this a site that should be maintained as part of the wider area for its wildlife interest. (Warwick District Gypsy and Traveller Sites Habitat Assessment page 15)'

The development will impact on the non-statutory designated ecosite, Marsh Along Tach Brook, and is also likely to impact on the non-statutory designated Local Wildlife Site, Tach Brook. The woodland ecosite area is of local ecological importance, but the Tach Brook is of county importance given its status as part of the River Avon system. The level of impact on both these sites will depend on the extent of ground releveling works required and the location and design of the proposed pitches and access arrangements; precautions will be required to prevent significant damage to this site, in particular the watercourse (Swift Ecology Report Appendix A attached)

Comment: This weighs significantly against the site



The Tach Brook runs alongside the site and is of 'county wide importance given its status as part of the River Avon system'

'The site also has the potential to support reptiles and great crested newt and the presence of dormouse and white-clawed crayfish cannot be ruled out'

'The site is likely to be used by foraging or commuting bats'.

'Trees, hedges and scrub are potentially suitable for use by nesting birds and the steep earth banks of the stream could also be used by breeding kingfisher'.

'Wildlife interest' on site

'Evidence of badger activity and nesting birds was found on the site, and there is a high likelihood that roosting bats are present in some of the more mature trees. Possible water vole burrows were found along the banks of Tach Brook, but this would need to be confirmed through further dedicated survey work. It is also possible, although unlikely, that the stream is used occasionally by otter. The site also has the potential to support reptiles and great crested newt and the presence of dormouse and white-clawed crayfish cannot be ruled out'. (Swift Ecology Report Appendix A attached)

Wider ecological significance

'The River Avon lies approximately 1.8 km to the west of the site, which is hydrologically linked to the site via the Tach Brook tributary. (Swift Ecology Report Appendix A attached)

Comment: The site has intrinsic ecological value and also possesses a wider ecological significance. The potential effects of development at this site constitute a **major negative** significantly outweigh potential benefits.

9.2.6 Flooding

WDC states that the site area has been reduced to take account of flooding (SFG&T page 21)

Given that this site could house vulnerable structures (potentially occupied by vulnerable people) we would recommend that a full flood risk assessment is carried out prior to its further consideration. This will either eliminate the site from further consideration or else provide greater confidence to WDC, an Inspector at Examination in Public or a prospective developer. Given that the site is being assessed as part of a shortlisting process we feel that this key issue should not be left to the Planning Application stage.

9.2.7 Contamination and other constraints

*'Sand and gravel safeguard area
Potential noise from Europa Way'*
WDC Site assessment report Section GT15 subsection 7

Comment: With regards to 'constraints', WDC should provide a clear information as to the design prospects of this side which is constrained by a steeply sloping embankment, difficulties regarding connections for waste and power, natural constraints (to impact on the fauna, flora and river – both at the construction stage and during occupation e.g. access onto the site by emergency vehicles).

Comment: Further constraints due to **topographical land features, location and size of the site include:**

- **Access' issues into and around** the site (for large towed vehicles, emergency vehicles) may be adversely affected given the relatively steep slope down to the site and the costs of levelling/ terracing required to achieve suitable access gradients and to level terrain to level terrain to accommodate site trailers.

- The impact of the **generally sloping terrain on occupants** with mobility difficulties and whether this topographical issue would permit easy use of wheelchairs, mobility scooters, pushchairs etc.
- **General lack of space** for visitors, overnight guests, play area, parking, paddock for horses etc. (X)
- The cost and technical requirements involved in providing for **waste disposal**
- **Unresolved issues** of potential **air, light and noise pollution, archaeological significance, flood risk** (assessment, management and mitigation)
- Potential effect on the **visual amenity of residents**

Comment: Design guidance. Planning Policy for Traveller Sites – Department for Communities and Local Government 2012 (PPfTS) states that when assessing sites in a rural or semi-rural setting, site development must accord with the design principals and specific issues contained in Designing Gypsy and Traveller Sites, Good Practice Guide, DCLG May 2008 (XL). We recommend that WDC provide a clear statement/ assessment as to the design prospects of this site. This will either eliminate the site from further consideration or else provide greater confidence to WDC, an Inspector at Examination in Public or a prospective developer. Given that the site is being assessed as part of a shortlisting process we feel that this key issue should not be left to the Planning Application stage.

Comment: Effect on noise levels emanating from altered ground levels and creation of vehicular access. It is possible that this may give rise to

increased levels of noise nuisance. The effects of **noise nuisance** on occupants sleeping in vulnerable structures at this site is unknown and should be investigated further (as part of a design statement) if the site is to remain a 'preferred' site.

Comment: Noise levels. The issue of potential noise nuisance associated with the close proximity of the site has already been noted (above – site assessment comments) and we concur that an appropriate survey should be undertaken prior to the site being consideration for further consideration as a draft submission stage site. The (Enfusion) sustainability assessment ('1') notes that:

'The site is adjacent to the Warwick by-pass A452 (noise effects on sensitive residential development) and..... In addition, it is recommended that a noise assessment is carried out to identify possible noise impacts and suggest appropriate mitigation.'

Comment: Archaeological significance. It is noted that the *'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'*. No assessment is therefore currently available as to this facet of the site

9.2.8 Agricultural land quality

In practical terms this is undeveloped woodland (Grade 3 agricultural)

9.2.9 How visible and open in character is the site?

'The land therefore slopes away from the road and is less visible because of this' WDC comments above

Comment: Site prominence may change as re-leveling will be required to ensure access to the site. This should be clarified via an outline design statement/ assessment against best practice guidelines as referenced above.

9.2.10 Can the site be visually screened adequately?

Comment: Site visibility may change if re-leveling is required to ensure access to the site – this in turn may affect landscaping. This should be clarified via an outline design brief/ assessment against best practice guidelines as referenced above.

9.2.11 Is the site close to other residential property?

There are other residential properties fairly close to the site. The properties can be seen from the site and (dependent on screening provision) this factor has the potential to affect the visual amenity of these residents and the occupants of this site

9.2.12 How far away is the primary road network?

The site adjoins the primary network

9.2.13 Distance to GP surgeries, schools, dentists, hospitals, shops, community facilities?

'The nearest school to this site is Kingsway (1.9 miles) which does have capacity. New schools built through new housing developments allocated in the Local Plan could also provide the opportunity for school places. Other existing schools are at Bishop's Tachbrook, St Margaret's and St Joseph's. A GP surgery is located at Bishop's Tachbrook (1.6 miles) and public transport provided by the 68 bus service (554m) and 77 bus service (554m).

Comment: Comments from local residents point to the fact that local bus services are infrequent and that distances to nearest bus stops are not within acceptable distances i.e.

*'Although the bus route may be 554m away, **the nearest bus stop is 1.3m away.** The 77 calls at that nearest stop 3 times a day (last bus 11.43am) to Leamington. Saturdays twice a day. (So an even less frequent service than through the village.)*

*There is also a service to Fenny Compton three times a day from that stop, still number 77. **The 68 which is also referred to does not stop there***

(Email from resident)

Comment: There are no formalised pedestrian walkways or cycle-ways along this busy stretch of road. The site offers a lack of choice of modes of transport for occupants and/or visitors. The site would therefore – most likely – be car dependent. This weighs against the site in terms of its choice or sustainability. This point was born out by the earlier interim assessment report commissioned by WDC (1 Sustainability Assessment) which stated that:

*'With regard to SA objectives relating to sustainable transport; the need to travel; and access to local services & community facilities, the effects are considered to be **uncertain/ minor negative** at this stage. This is because although the site has good access to local services and facilities within 2 miles, it currently has **no access to public transport or safe pedestrian walkways and at this stage**, little detail is known about existing traffic and transport issues and how the allocation will affect them. Mitigation is provided to a certain extent by national planning policy but the effectiveness of the mitigation will depend on design and layout at the development management level. It is recommended that there are **strong public transport infrastructure requirements for this site** to ensure that the right level of improvement and upgrade is achieved'.*

Comment: A 4-5 pitch site could generate in the region of 25 plus trips per day (business, personal, school) with little or no opportunity to offset this through use of local bus services.

Comment: General availability of school places. WDC has stated on various occasions that 'school places are available' whereas local opinion tends to disagree and feels that 'local schools are full'. It may be

appropriate for BTPC to discuss with Governors and others the actual picture with perhaps the provision of accurate/ transparent statistical data to be fed into the consultation process to demonstrate availability of places. Information should also be made available as to when new schools will be built and new places available as this also may affect the viability of the site from a site shortlisting perspective.

9.2.14 Is the potential site on previously developed land?

No. See comments above

9.2.15 Access issues

'Access and visibility splays are achievable if some roadside vegetation is removed' WDC comments above

Comment: Whilst this may be accepted, BTPC may wish to ask WDC to comment on the issue of large slow moving vehicles (towed caravans, trailers etc.) seeking to access the site by way of a right turn across the carriageway. During various site visits traffic has been observed to be fast moving and the relatively narrow carriage-way currently offers no prospect of 'hatching' to filter right turning vehicles into a separate lane (allowing other vehicles to pass by safely). This factor may militate against road safety and impact on traffic flow and would need to be assessed in detail prior to its continued inclusion as a preferred site.

Note: Policy DP6 of the Warwick District Local Plan 1996 - 2011 states that development will only be permitted which provides safe and convenient access and where development can demonstrate that does not cause harm to highway safety.

Comment: our key concern relates to access (down) a steep slope and onto and un-level site.

Comment: Members of the travelling community suffer disproportionately with ill health. Information as to how occupants with limited mobility needs would cope in such circumstances (uneven/sloping/ or re-levelled terrain) is not available or referred to as part of the early accessibility or sustainability equation. This should form part of an early design statement relating to the site.

9.2.16 Level site?

No

Comment: our key concern relates to access (down) a steep slope and onto an un-level site.

9.2.17 Suitable size

Comment: See our remarks above regarding the need for a design statement which would address (a) whether the site was suitable and (b) what would be the appropriate size of the site.

9.2.18 Availability

Comment: The land is available/ in public ownership and available for transfer to from WCC to WDC (and thereafter for sale) on request.

9.2.19 Deliverability

In terms of timescale *'In theory, it should be possible to deliver this site ahead of others as the land can be transferred easily'* (1 WDC comment)

Comment. Our overall assessment concludes that

(a) there are key factors which indicate that the site is unacceptable (national policy, ecological, topographical, service availability, sustainability)

(b) there are key elements of information missing which mitigates against the sites further inclusion as a preferred site (flooding, design potential, archaeological significance) and

(c) that this site (with or without further information) presents itself as unattractive to a potential developer and should be removed from consideration as a 'preferred' site by WDC.

10. Land at 'Hill Farm', Tachbrook' (Gt05) SITE ASSESSMENT

GT05 Land at Tachbrook Hill Farm (Green rated) described as potentially accommodating 15 pitches

10.1 Local Authority description of site:

GT05 Land at Tachbrook Hill Farm (Green)

This site is not in the Green Belt. It is unlikely that the site could be connected to the public foul mains sewer so would need a non-mains solution

It lies wholly within low risk Flood Zone 1 and is sequentially preferable in terms of flood risk. The land is Grade 3 agricultural land.

Access is feasible if created northwest of Tachbrook Hill Farm access, but should be in advance of traffic calming features.

Bishop's Tachbrook School is the closest to the site (0.9 miles). Children living on this site would secure places over children at a greater distance. There are also three new schools proposed as part of the allocated development sites in the Draft Local Plan and these will also serve this area.

A GP surgery is located at Bishops Tachbrook one mile away. The 77 bus service passes the site.

The landowner is not willing to sell this site, so compulsory purchase powers would have to be used to bring the site forward.

10.2.1 Landscape character

The WDC site assessment classes this as 'Dunsmore and Feldon' (*// Site Assessment GT05*) which means that it is predominantly a rural and agricultural landscape varying between a more open character (from the old English term for field 'Feldon' or 'open cleared land') and 'Dunsmore' having more of a wooded character. These two characteristics are materially relevant from a Planning and site assessment perspective.

Comment: Policy H of the Planning Policy for Traveller Sites provides guidance on the assessment of planning applications for traveller sites. Paragraph 24 encourages local planning authorities to attach weight

to 'The effective use of previously developed (brownfield), untidy or derelict land'. GT05 does not correlate to any of these descriptions contained within Policy H which may conflict with the 'preferred' status of the site given that it cannot be accorded such weight in its favour.

10.2.2 Nature conservation designation

None that we are aware of

10.2.3 Historical designation

'Fieldscapes. Large fields showing some evidence of ridge and furrow suggesting that this once formed medieval open fields. Tachbrook Hill Farm, Farm Complex pre 1880s - Historic Farmstead' (II Site Assessment GT05)

Comment: This information implies that any potential development may affect the setting of the 'Historic Farmstead' (Grade 2 listed building to the adjoining farmstead complex which shares the same access as Hill Farm

Comment: This information implies that there may potentially be valuable archaeology at the site. There is an absence of information of this facet of the site and further (full) data is required. The creation of vehicular access to the site and the installation of drainage/ waste removal facilities will undoubtedly impact on the site. WDC state that:

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available (See section 12 below)

10.2.4 Infrastructure requirements

Comment: WDC's site assessment flags up **key 'negatives'** regarding infrastructure requirements which carry significant weight against the proposal. WDC state that the site is:

'Unlikely to be able to connect to public foul mains sewer and would need non-mains solution. Nearest waterbody for discharge of treated

sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment' (II Site Assessment GT05)

Comment: This significantly weighs against this potential site option. We would also seek clarification as to whether it is likely (as with site GT15 that:

In order to provide an electricity supply some High Voltage network would need to be constructed before Low Voltage supply could be provided. This will be expensive and may make the site unviable for the number of pitches which could be accommodated' (ii Site assessment report WDC website – GT15 site description section 4 'infrastructure requirements')

10.2.5 Ecology

Comment: Notwithstanding the importance of the ecological points raised in 9.2.4 it is clear that there is merit in **preserving ecologically 'valuable' features of the site** from the impact of development caused by creating a vehicular access:

The WDC site assessment notes that

'The ponds should be retained and surveyed for Great Crested newts. Consider further pond restoration in the area. Hedgerows should be retained and their connectivity of the small areas of woodland maintained and enhanced wherever possible' (II Site assessment Section GT05)

Comment: An independent ecology report notes that there are a number of features pertaining to the site which are worthy of note (from an ecological and biodiversity perspective) and states that any

'... proposed development avoids impacting on the strip of remnant woodland to the west of the site, the parallel lines of linear scrub to the north of the site and the two waterbodies within the site'. (Swift Ecology Report Appendix B- section 5.1 attached)

Comment: Some of the most ecologically valuable features of the site would be impacted upon by the creation of a new vehicular access. The part of the site which is alongside the Banbury Rd is of particular relevance

to any site assessment given that this is potentially any area which could be impacted upon by the creation of a new vehicular access. This area is described as:

'A narrow strip (up to 10 m wide) of remnant broadleaved semi-natural woodland runs along the A452 road verge, just outside the site's western boundary fence. The canopy is dominated by oak, including some large mature specimens..... a dry ditch runs through this section, which probably fills during heavy rain due to run-off from the road. (Appendix B 3.3.3)

And

'The remnant strip of broadleaved seminatural woodland along the western boundary is indicative of the historic landscape pre-dating its use for agriculture. The woodland strip, linear scrub and waterbodies are the most ecologically valuable features on site' (Appendix B 4.1)

And

'The layout of the proposed development is not yet known and therefore it is not possible to assess impacts on the site fully; however, some disturbance of marginal habitat is likely to be caused by the creation of an access road into the site as this is likely to necessitate the removal of some trees and shrubs'. (Appendix B 4.1)

'Wildlife interest' on site

The ecology report notes that:

'The site is suitable for sett building and for use by badgers for foraging, and a number of signs of badger activity were recorded within the site' (Appendix B 3.4.1) and that measures would need to be implemented to offset and protect the site' And that there is also some potential for the presence of Great Crested Newts – although potential habitats were described as 'poor' and 'below average'.

Comment: The site therefore has intrinsic ecological value – particularly the wooded area, mature Oaks and water-bodies. The potential effects of development at this site - particularly along the Western boundary - constitute a **major negative** significantly outweighing potential benefits.

10.2.6 Flooding

WDC states that the site lies wholly within low risk Flood Zone 1 and is sequentially preferable in terms of flood risk

Comment: This is agreed. It is however noted that

(a) flooding occurs at the junction of Mallory Rd/ Banbury Rd and

(b) that the dry ditch along the Western boundary may be an asset which prevents a much greater problem at this point – as well as greater levels of flooding on the road itself. Any new access via the Western boundary would impact on the dry ditch and therefore a detailed investigation should be commissioned to understand how any potential development would impact on local and wider flooding issues.

(c) Given that this site could house vulnerable structures (potentially occupied by vulnerable people) we would recommend that a full flood risk assessment is carried out prior to its further consideration. This will either eliminate the site from further consideration or else provide greater confidence to WDC, an Inspector at Examination in Public or a prospective developer. Given that the site is being assessed as part of a shortlisting process we feel that this key issue should not to the Planning Application stage

10.2.7 Contamination and other constraints

Noise from M40 to south and from A452 to west, but may not have severe impact on remaining land for consideration

(WDC site assessment)

Comment: WDC should clarify this issue as part prior to any further consideration of the site. Of interest is a comment made by a local resident at the recent 'engagement day' which points to acknowledged noise issues from the M40.

'In 1992 all Bishop's Tachbrook residents were compensated for noise pollution due to siting of M40. GT05 is closer to M40 than Bishop's Tachbrook village. By the precedent set for compensation this makes the site unsuitable for Caravans due to noise'. A452 is a main arterial route to M40(s) and to Gaydon Site from Leamington /Warwick making this an extremely busy road especially during morning and evening rush hour'. See Section 15 Below – residents comments from the engagement day

Comment: With regards to 'constraints' it is clear that there are still unresolved issues relating to this site i.e.

- Potential **air, and noise pollution, archaeological significance, flood risk** (assessment, management and mitigation).
- Potential effect of **light pollution** on current owner and other nearby residents. XI (Designing G&T Sites states that) '*Sufficient lighting must be provided on the site to enable safe access and movement through the site at night for both pedestrians and vehicles*' (5.22).
- Potential effect on the **visual amenity of residents** and their business interests. The site is an important and integral part of the business operations of the owners of land. WDC notes in its assessment of another location (GT06) that development on this land '*May cause problems for viable agricultural unit*'. This also applies to GT05.

Combined impacts (Noise, air, light, soil quality)

The effects on the SA Objective relating to air, water & soil quality are considered to be major negative in the long term. This is because the development at the site could lead to the loss of the best and most versatile agricultural land (grade 3 (provisional) although it is uncertain whether this is grade 3a)³¹. In addition, the site is adjacent to a main A road³² with potential for high levels of noise, poor air quality and possibly light pollution to have minor negative effects on the development and on SA Objective 14. It is recommended that a noise assessment is carried out to identify possible noise impacts and suggest appropriate mitigation.

Comment: These issues weigh against the site becoming a 'preferred site'.

Comment: Archaeological significance. It is noted that the *'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'*. No assessment is therefore currently available as to this facet of the site

10.2.8 Agricultural land quality

Grade 3 agricultural

10.2.9 How visible and open in character is the site?

WDC's site assessment states that the land is *'Open in part from Banbury Road, but could be screened'*

Comment: This would have the undesired effect of increasing the impact of any proposed development on visual amenity character and quality of landscape.

10.2.10 Can the site be visually screened adequately?

Comment: See 10.2.9

10.2.11 Is the site close to other residential property?

Other properties are located at Tachbrook Hill Farm. WDC's site assessment describes these as

'Tachbrook Hill Farm, Farm Complex pre 1880s - Historic Farmstead' (includes a listed property)

Any development therefore has the potential to affect the setting of the listed building

This issue was also addressed in the (Enfusion) sustainability assessment which stated that the:

Potential effects on historic environment are considered to be minor negative at this stage. Although there are no Conservation areas or Scheduled Monuments on or adjacent to the site, there is a Listed Building

adjacent to the site³⁴. The development has the potential to affect the setting of the Listed Building. (1)

10.2.12 How far away is the primary road network?

The site adjoins the A452 and is within easy reach of the M40 junction

10.2.13 Distance to GP surgeries, schools, dentists, hospitals, shops, community facilities?

WDC's site assessment states that:

'Bishops Tachbrook school (0.9 miles). Education: The priority area school would be Bishops Tachbrook Primary School which is usually over-subscribed. Proposed housing in the area could see the need to expand the school or change the priority area. If no changes are made to the school, children living on this site would probably secure places over other in area children on distance. The priority area includes parts of Warwick Gates. GP surgery at Bishops Tachbrook (1 mile). 77 bus service passes site'

Comment: The attached Transport report (Appendix C) addresses the difficulties that occupants will encounter attempting to access local facilities on foot or by cycle. The site would be effectively car dependent, undermining its sustainability. Any development of this site would therefore carry with it a strong transport infrastructure requirement – which would add significantly to the overall cost of the site. The 'need' for such a requirement was clarified by the earlier interim assessment report commissioned by WDC (Enfusion) which stated that

'It is recommended that there are strong public transport infrastructure requirements for this site to ensure that the right level of improvement and upgrade is achieved'

Comment: General availability of school places. With regards to educational provision, the WDC site assessment report states that:

'Education: The priority area school would be Bishops Tachbrook Primary School which is usually over-subscribed. Proposed housing in the area could see the need to expand the school or change the priority area. If no changes are made to the school, children living on this site would probably secure places over other in area children on distance.'

Comment: From our two engagement events we agree that local opinion also feels that the schools **are** over-subscribed. It was evident from discussions with residents that the possibility of children at this site securing places over other children (on distance) could cause residual resentment both towards the site and the occupants.

'There are three new schools to be built to the south of Warwick, Leamington and Whitnash as part of the new development sites which are being proposed through the new Local Plan. These schools would serve the needs of all students within the relevant catchment areas' (See section 12)

Comment: It is acknowledged that this would reduce pressure on school. Local residents however (a) felt that such plans and the construction of schools was some way off, not yet agreed and (c) did not offer short or medium term mitigation of problems caused by 'adding to demand' in the area

10.2.14 Is the potential site on previously developed land?

No.

Comment: Policy H of the Planning Policy for Traveller Sites provides guidance on the assessment of planning applications for traveller sites. Paragraph 24 encourages local planning authorities to attach weight to '*The effective use of previously developed (brownfield), untidy or derelict land*'. GT05 **does not correlate** to any of these descriptions contained within Policy H which may conflict with the 'alternative' status of the site given that it cannot be accorded such weight in its favour

10.2.15 Access issues

'Access taken from A452 would require visibility splays of 2.4m x 160m. Use of existing Tachbrook Hill Farm access not recommended as sited opposite an existing junction and not recommended any closer to motorway junction. If access created northwest of Tachbrook Hill Farm access, it should be in advance of traffic calming features. Access from Mallory Road would not be recommended. May be issues regarding forward visibility due to existing vertical alignment of road. Forward visibility should match that of the access

and would be 160m in this case (WDC site assessment comments (I)'

Comment: The attached independent Transport Report (Appendix C) concludes:

5.5 Recommendation

5.5.1 *The layout of the A452 adjacent to the site and the existing accident record of junctions along the A452 in the vicinity of the site, indicate that a safe access to a traveller's site at Hill Farm cannot be achieved and any new junction would worsen an already poor safety record along this section of highway.*

5.5.2 *The site is also poorly located in terms of access by non-car modes with pedestrian safe access to the site difficult to achieve.*

5.5.3 *Therefore this site is not suitable for the provision of a travellers' site in terms of highway safety and accessibility and Warwick District Council may wish to remove it from their list of potentially viable alternative traveller sites based on these factors.*

This is a **major reason which carries significant weight against the proposal** and it its own right merits the withdrawal of the site as an unviable option.

Note: Policy DP6 of the Warwick District Local Plan 1996 - 2011 states that development will only be permitted which provides safe and convenient access and where development can demonstrate that does not cause harm to highway safety.

10.2.16 Level site?

Yes

10.2.17 Suitable size

Yes

10.2.18 Availability

Comment: The land is not available unless via Compulsory Purchase

10.2.19 Deliverability

Comment: The land is not available unless via Compulsory Purchase

Comment. Our overall assessment concludes that given the significant known 'negatives', lack of information, uncertainties and community concern surrounding this site we **recommend that BTPC should:**

(a) reject this site as a potential residential traveller site and

(b) make representations to WDC to remove this site from further consideration for the reasons identified above

11. 'Park Farm/ Spinney Farm' (GT06) SITE ASSESSMENT

GT06 Land at Park Farm/Spinney Farm (PART) Amber rated originally described as 15 potential traveller site pitches

11.1 Local Authority description of the site

Not in green belt

May cause problems for viable agricultural unit

Proximity to grade 1 listed Park and Garden at Castle Park

Contamination issue related to former landfill site on western third of site reduces developable area

May be noise issue connected with proximity to Warwick By-Pass in part

Lies within flood zone 1 and therefore sequentially preferable

Access should be achievable north of Park Farm

11.2 Overall conclusion

This site is (correctly) a lower priority site option and is rated as 'amber' on the current list of alternative sites.

As such it is categorised by WDC as one of a number of sites which has:

'been short listed as they could be made suitable if some fairly major changes were made. For example, if a third party could be persuaded to allow access over their land or where more information about the nature of the contamination would allow further consideration of the site' (WDC site assessment)

The site therefore carries inherent difficulties and these issues (combined with the points below) would lead us to advise BTPC to object to this site for the reasons shown below and request that the site is removed as a potentially viable 'alternative' site .

Our comments relating to the site based on WDC's own assessment criteria follow:

11.2.1 Landscape character

The WDC site assessment classes this as 'Dunsmore and Feldon' (*II Site Assessment GT06*) which means that it is predominantly a rural and agricultural landscape varying between a more open character (from the old English term for field 'Feldon' or 'open cleared land') and 'Dunsmore' having more of a wooded character. These two characteristics are materially relevant from a Planning and site assessment perspective.

Comment: Landscape 'setting'. The site is Adjacent to the Grade 1 Registered Warwick Castle Park which means that any development has the potential to affect the historic setting of the landscape

11.2.2 Nature conservation designation

None that we are aware of

11.2.3 Historical designation

'Adjacent to Grade 1 Registered Warwick Castle Park. Fieldscapes, part planned enclosure, Small area of broad leaved plantation. Park Farm - Farm Complex pre 1880s'
(*II* Site Assessment GT06)

Comment: This information implies that any potential development may affect the setting of the Warwick Park Castle and the adjoining farmstead complex.

11.2.4 Infrastructure requirements

Comment: WDC's site assessment flags up key 'negatives' regarding infrastructure requirements which carry significant weight against the proposal. WDC state that the site is:

'Unlikely to be able to connect to public foul mains sewer and would need non-mains solution. Nearest waterbody for discharge of treated

sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment' (II Site Assessment GT06)

Comment: This significantly weighs against this potential site option.

We would also recommend that BTPC seek clarification from WDC (as with site GT15) whether it is likely that:

'In order to provide an electricity supply some High Voltage network would need to be constructed before Low Voltage supply could be provided. This will be expensive and may make the site unviable for the number of pitches which could be accommodated' (ii Site assessment report WDC website – GT15 site description section 4 'infrastructure requirements')

11.2.5 Ecology

We note the comments in 11.2.4

'Nearest waterbody for discharge of treated sewage is Tach Brook. Tach Brook is failing in its objectives under Water Framework Directive due to high levels of phosphates and therefore the site is not suitable in terms of potential impact on water environment' (II Site Assessment GT06)

and the significant weight that this carries against any proposal.

The WDC site assessment also notes that:

'Consider reinstating and retaining hedgerows in order to improve connectivity throughout the site Maintain roadside verges as semi-improved grasslands with associated tree and shrub linear features' (II Site assessment Section GT06)

Comment: Current refusal by the farm building owner to consent to the use of the existing access may require a new vehicular access to be created which will adversely affect the impact on the grass verge/hedgerow and adversely affect connectivity.

11.2.6 Flooding

WDC states that the site area

'Lies wholly within low risk Flood Zone 1 however there is an ordinary watercourse running through the centre and along the eastern boundary for which no modelling has been undertaken. This could affect the capacity of the site for development and therefore further assessment need to be undertaken prior to allocation. Regardless of floodplain extent, the watercourse and ponds must be protected and buffered from development'

Comment: This is agreed. A Flood Risk Assessment should be undertaken prior to this site receiving further consideration as an 'alternative' site. Failure to do this (e.g. waiting for this information to be obtained as part of a Planning Application) would not give WDC, an Inspector at 'Examination in Public' or a prospective developer confidence that the site was deliverable

11.2.7 Contamination and other constraints

'Historic landfill on south west corner of site (1970-77) and is therefore pre COPA licensing. Combination of waste types may have entered landfill during its lifetime and is best left undisturbed. Historic landfill also takes up significant portion of west of site. Siting of soakaways should be avoided on site to prevent mobilisation of contamination to controlled waters receptors. Should development be brought forward then appropriate contamination investigation will be required prior to allocation'

('II' WDC site assessment)

Comment: A full assessment of contamination should be undertaken prior to this site receiving further consideration as an 'alternative' site. Failure to do this (e.g. waiting for this information to be obtained as part of a Planning Application) would not give WDC, an Inspector at 'Examination in Public' or a prospective developer confidence that the site was deliverable.

Comment: With regards to ‘constraints’ it is clear that there are still unresolved issues relating to this site and the impact on the **occupants** of the site i.e. potential **air, and noise pollution, archaeological significance, flood risk** (assessment, management and mitigation).

Comment: There are also the potentially negative effects which could be experienced by the farm occupants e.g.

- Potential effect of **light pollution** (XI Designing G&T Sites states that ‘*Sufficient lighting must be provided on the site to enable safe access and movement through the site at night for both pedestrians and vehicles*’ (5.22).
- Potential effect on the **visual amenity of residents** and their business interests. The site is an important and integral part of the business operations of the land owner. WDC notes in its assessment of GT06 that development on this land ‘*May cause problems for viable agricultural unit*’.

Combined negative impacts (Noise, air, light, soil quality) constitute a ‘major negative’

‘The effects on the SA Objective relating to air, water & soil quality are considered to be major negative in the long term. This is because: the development at the site could lead to the loss of the best and most versatile agricultural land (grade 3 (provisional)); the site is very close to an area of historic landfill⁴⁴ with the potential for contaminants to be present; and the site is adjacent to a main A road⁴⁵ with potential for high levels of noise, poor air quality and possibly light pollution to affect the development. In addition, as a result, there could be negative effects on health. It is recommended that a noise assessment is carried out to identify possible noise impacts and suggest appropriate mitigation as well as a land quality assessment to identify any potential contaminants and suggest mitigation as appropriate’.

Enfusion sustainability report (1)

The WDC sustainability report (1) also noted that:

‘The site is adjacent to the Warwick by-pass (A452) and the M40 (noise effects on sensitive residential development) and..... In addition, it is recommended that a noise assessment is carried out to identify possible noise impacts and suggest appropriate mitigation.

WDC will be aware that noise effects can be a significant obstacle for development and no further consideration of the site should be undertaken without this information being available.

Comment: These issues strongly against the site continuing as an 'alternative site' with green rating or progressing to 'preferred' status

Comment: Archaeological significance. It is noted that the '*Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available*'. No assessment is therefore currently available as to this facet of the site although the past use of the site for 'landfill' may weigh against its historic value.

11.2.8 Agricultural land quality

Grade 3 agricultural (part)

11.2.9 How visible and open in character is the site?

WDC's site assessment states that '*In parts the site is quite open*'.

Comment: Any proposed development would have the undesired effect of impacting negatively on the visual amenity, character and quality of the landscape.

11.2.10 Can the site be visually screened adequately?

Comment: See comments above 11.2.9

11.2.11 Is the site close to other residential property?

There are a 'few houses and barns' located near to the site and Park Farm/ Spinney Farm is located next to (and partly surrounded by) the prospective site, See comments on impact on amenity of residents (11.2.7 above).

11.2.12 How far away is the primary road network?

The site is bounded by the A452 and A425

11.2.13 Distance to GP surgeries, schools, dentists, hospitals, shops, community facilities?

WDC's site assessment states that:

*'Bishops Tachbrook school (1.3 miles)
Barford school (1.3 miles)
Warwick schools (1.7 miles)
West of Warwick schools (2.4 miles)
Education: Limited places in Leamington -
Kingsway Primary
GP surgery at Bishop's Tachbrook (2.6 miles) or
Hampton Magna (2.9 miles)
68 bus service (0.9 miles)'*

WDC's sustainability assessment states

'With regard to travel and transport, Although it is assumed that development at the site will not increase traffic significantly given the scale of the development, the site has poor access to public transport (bus stop is over 0.5 of a mile away)⁴⁸ leading to minor negative effects on SA Objective 2. However, at this stage, little detail is known about existing traffic and transport issues and how the development of the potential site will affect them. Mitigation is provided to a certain extent by national planning policy but the effectiveness of the mitigation will depend on design and layout at the development management level. It is recommended that there are strong public transport infrastructure requirements for this site to ensure that the right level of improvement and upgrade is achieved'.

Comment: This description indicates that occupants of any traveller site at this site would have poor choices of travel modes (being unable to access facilities on foot or by bicycle) and that the site would be car dependent undermining its sustainability. Any development of this site would therefore carry with it a strong transport infrastructure requirement – which would add significantly to the overall cost of the site.

Comment: General availability of school places. With regards to educational provision, a previous WDC site assessment (GT05) states that:

‘Education: The priority area school would be Bishops Tachbrook Primary School which is usually over-subscribed. Proposed housing in the area could see the need to expand the school or change the priority area. If no changes are made to the school, children living on this site would probably secure places over other in area children on distance’

Comment: A development at this location would exacerbate the pressures on a school which is already ‘usually over-subscribed’. If GT05 and GT06 were both considered as suitable traveller sites this situation could be compounded with a net (and disproportionately negative) effect on children from the settled community. From two engagement events held in Bishop’s Tachbrook it was evident that this was a concern expressed by local parents. This factor would however be reduced if other sites mentioned were not delivered.

11.2.14 Is the potential site on previously developed land?

In part.

Comment: Policy H of the Planning Policy for Traveller Sites provides guidance on the assessment of planning applications for traveller sites. Paragraph 24 encourages local planning authorities to attach weight to:

‘The effective use of previously developed (brownfield), untidy or derelict land’.

GT06 does not in part correlate to this description contained within Policy H which may conflict with the ‘alternative/amber’ status of the site given that it cannot be accorded such weight in its favour

11.2.15 Access issues

Access created from A435 would need to have visibility splays of 2.4m x 215m in both directions. Existing access to Park Farm likely to meet this standard. If new access created it is unlikely that it could be located closer to existing roundabout without the removal of hedgerows and trees. Any access created north west of Park Farm access must adhere to required visibility standards. Access should not be created in proximity of lay-by on A425

WDC site assessment comments

Comment: The owner of the farm building is understood to be opposed to the use of his access for this purpose. The comments above highlight (a) the possible difficulties of achieving safe access from the A425 and (b) the associated negative effects on local biodiversity (trees, hedges) etc. This issue also weighs against any development proposal.

Note: Policy DP6 of the Warwick District Local Plan 1996 - 2011 states that development will only be permitted which provides safe and convenient access and where development can demonstrate that does not cause harm to highway safety.

11.2.16 Level site?

Yes

11.2.17 Suitable size

Yes

11.2.18 Availability

Comment: This site is **not available** – unless by compulsory purchase (CP) and the acquisition of the site by these or other means is strongly opposed by the owners. Access to the site is also in separate ownership and, again, the owner does not consent to the access being used,

CP is an extremely lengthy and costly process without a guaranteed outcome. There is therefore a very uncertain prospect of the site being deliverable.

11.2.19 Deliverability

This site is **not deliverable** unless (a) by compulsory purchase of land and (b) potentially access area and (c) without a clear strategy to overcome all of the suggested 'negative' factors affecting the site (see above)

Comment: Local community opinion was opposed to this site becoming a traveller at our engagement event **(see comments below in Section 15)**

Comment 'overall conclusion'. Our overall assessment concludes that given the known 'negatives', lack of information, uncertainties and community concern surrounding this site we **recommend that BTPC should:**

(a) reject this site as a potential (or 'alternative') residential traveller site and

(b) make representations to WDC to remove this site from further consideration for the reasons identified above.

12 Response to Link Support Services (UK) Ltd questions from WDC regarding prospective traveller sites – 3/4/14

QUESTIONS TO WDC: REF GT05

***GT05 Land at Tachbrook, Hill Farm Banbury Rd (15 pitches).
'Alternative Site'. For clarity, our questions relate to land adjoining
(and owned by) Hill Farm (not Tachbrook Hill Farm)***

1a Given that the land owner at Hill Farm is fully committed to opposing this proposal, what effect would this have on the delivery of the site – particularly in terms of short term delivery - and the Examination in public by the Inspector (should this site progress to the draft submission stage.

'The site would need to be subject to Compulsory Purchase in view of the owner's opposition and this is known to be a long and tedious process for all parties. The Council will take such action only as a last resort and if the sites cannot be delivered to meet the evidenced need of 31 pitches within a 15 year period'

PITCHES

2a What business use would WDC envisage taking place on any proposed G&T site at this location?

'The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process. Any business use would need to be ancillary to the residential use of the site and comply with Local Plan policy'

2b Have precise boundary lines been drawn for the proposed site? If yes please clarify.

'No. Precise boundary lines have not been drawn and only a small area of land (for a maximum of 15 pitches) is required within the indicated site area'

2c Given that the proposed (alternative) site is very large, would it be the Council's intention to allow further traveller site development on this land to accommodate growing family need or seek to acquire adjoining land via CPO?

'It is not currently the Council's intention to extend sites but there may be consideration of this should monitoring prove a further need'

FLOODING (The land lies in Flood Zone 1)

3a Is the Council aware of any critical drainage problems on this land or nearby/ affecting the land?

'We are not aware'

NOISE ('The site area has been reduced to avoid noise from major roads')

4a Have noise measurements been taken of the noise levels from the M40 and other roads (e.g. Mallory Rd)

'Not as yet. The sites are being considered as part of the Preferred Options consultation and these sites may not be those which go forward into the final plan. These more detailed pieces of evidence will be collected to inform the final choice of sites'

4b If yes, please send your measurements

'N'

4c What is your view on the effects of noise levels on potentially vulnerable site occupants in mobile homes (both in terms of children using the outside environment and occupants seeking rest, respite and sleep)?

‘Advice will be taken on acceptable levels of noise to mobile home dwellers when the final choice of sites is to be made’

PEDESTRIAN ACCESS

5a What measures are proposed to improve the quality of walking routes to and from the site?

‘The advice of Warwickshire County Council will be sought on this issue’

5b What traffic calming measures would be proposed & how much would this cost?

‘The advice of Warwickshire County Council will be sought on this issue’

5c Is there a proposed cycle route from the site?

‘Not as yet, but this is a detail which would be considered as part of a planning application and the advice of Warwickshire County Council will be sought on this issue’

VEHICLE ACCESS

6a Have precise vehicle access routes been drawn? ('north west of Hill farm') and is it confirmed that proposed access would be via BANBURY Rd?

‘The advice of Warwickshire County Council will be sought on this issue’

6b Is WDC confident that appropriate visibility splays will be achieved?

‘The advice of Warwickshire County Council has been sought on this issue’

6c Have vehicle access routes been drawn or general access been assessed by Highways? If yes please send information

‘This is a question for Warwickshire County Council highway officers who have advised on the acceptability of sites in terms of access and highways’

6d Has a traffic speed count been undertaken for Mallory Rd/Banbury? If yes please send details.

‘This is a question for Warwickshire County Council highway officers who have advised on the acceptability of sites in terms of access and highways’

6e Have accidents statistics for Mallory Rd and Banbury road been requested? If yes please send details.

‘This is a question for Warwickshire County Council highway officers who have advised on the acceptability of sites in terms of access and highways’

6f What traffic calming measures would be proposed to ensure access and egress by large slow moving vehicles (Caravans/ trailers) to and from the site? And what would be the cost of this?

‘This is a question for Warwickshire County Council highway officers who have advised on the acceptability of sites in terms of access and highways’

6g In a recent decision (regarding refusal of proposed housing development near this site) it was commented by BTPC that *‘The use of this site for housing will significantly add to driver frustration and further accidents at the junction of Mallory Road and the Banbury Road. This is a dangerous intersection and a new junction designed for safety and to discourage through village traffic, would be required. It will also add significantly to traffic volumes on Mallory Road, which will already see an increase of 40% as a result of housing proposed as part of the New Local Plan.*

Do you agree a proposed 15 pitch traveller site would similarly pose hazards to driver safety AND that a new junction would need to be designed?

'There would be considerably fewer vehicles emerging and accessing a Gypsy and Traveller site, however, Warwickshire County Council highway officers advice is taken in relation to all planning applications'

IMPACT OF A PROPOSED G&T SITE ON THE EXISTING FARM BUSINESS AND OCCUPANTS? TRAVELLER SITE BUSINESS USE.

7a What would be the impact of a G&T site on the existing farm business?

'No doubt you will obtain the view of the landowner on this point'

7b What would be the impact on the residential amenity of occupants of Hill Farm?

'No doubt you will obtain the view of the landowner on this point'

7c Do you agree that *'It should be considered whether to explicitly allow for employment uses on the site in addition to residential'?*

'The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process'

7c Do you believe that business use would appropriate at this site?

'The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process. Any business use would need to be ancillary to the residential use of the site and comply with Local Plan policy'

7d If yes, what type of business use would be appropriate e.g. scrap dealing?

'N/A'

ARCHAEOLOGY

8a Is there any evidence of prehistoric assets at this site (e.g. Romano British Crop Marks)?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

8b Is there any other known archaeological significance to this site or surrounds?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

8c Is there any archaeological significance of the site relevant to (a) the nearby Chesterton Roman Town and (b) the Fosse Way?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

8d Have any relevant groups/ experts been consulted on the archaeological facets of this site?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

LISTED ASSET

9a Part of the next door farm business is a listed building. What liaison with English Heritage has been undertaken to assess the impact of a proposed development on the setting of a listed building?

‘English Heritage is a statutory consultee and will respond accordingly’

9b Does WDC consider that the the setting of the Listed Building at Tachbrook Hill Farm would be affected by the proposal, as the development would erode its rural setting, and also represent an adverse impact of the development?

‘English Heritage is a statutory consultee and advice will be forthcoming through the consultation process’

AREA IMPACT

10a Would you concur that the ‘visual impact of this proposal will be significant. and will be highly visible to all entering or leaving the village area, removing the rural buffer that currently exists’. (officers report on proposed housing development off Mallory Rd W13/1688 Feb 24th 2014). If yes: What measures would be taken to mitigate the effects on the openness, character and quality of the land?

‘Siting and any necessary mitigation would be considered as part of a planning application’

10b Does WDC agree that the development of the site would represent an adverse impact of the that would be contrary to Policy DP1, since the development would not positively contribute to the character or quality of its environment, and to also conflict with Policy DP3 by failing to protect and enhance the landscape character of the area?

'These policies are within the current Local Plan which is being reviewed and the new Local Plan is in an advanced stage of preparation. The new Local Plan is likely to have been considered by a Planning Inspector by the time the next stage of the Gypsy and Traveller DPD is prepared. It is likely therefore that by the time planning applications for such sites are considered, a new Local Plan will be adopted and sites will be appraised with reference to the new policies contained therein at that time'

LAND QUALITY

11a Are there any known contamination issues affecting the land?

'None that we aware'

11b Do you agree that *'The effects on the SA Objective relating to air, water & soil quality are considered to be major negative in the long term. This is because the development at the site could lead to the loss of the best and most versatile agricultural land (grade 3 (provisional) although it is uncertain whether this is grade 3a?'*

'The SA report has been prepared to advise of such issues and is one part of the evidence base to be taken into account when a decision on sites is taken'

11c What would be the effects on the local community of this loss?

'Any thoughts on this would be pure conjecture on the part of the Council and not based on evidence'

TRANSPORT INFRASTRUCTURE/ ACCESS TO SERVICES

12a Do you agree that there are ‘strong public transport infrastructure requirements for this site to ensure that the right level of improvement and upgrade is achieved?’

‘The availability of public transport is one of the criteria by which sites are considered for suitability. Need will depend very much on the number of pitches to be provided and will be considered at the planning application stage’

12b If ‘yes’ – what proposals do you have to achieve this?
‘N/A’

12c Are there any proposed improvements?
‘N/A’

12d Do you agree that the site is in close proximity to other proposed Gypsy and Traveller sites (e.g) GT15 and GT06 which could lead to cumulative effects on: sustainable transport; the need to travel; health; local services and community facilities; landscape’.

‘It is not intended that all of these sites would be progressed to the next stage of the Plan’

12e If yes, how do you propose to mitigate these effects?
‘N/A’

ECOLOGY

13a What is the ecological/ biodiversity importance of the land? (e.g. ponds/ grounds/mature trees)

‘You have received detailed reports on ecology prepared for WDC by Warwickshire County Council’

13b Has an ecology survey been undertaken and are mitigation/preservation strategies and their associated costs known? If yes please send details

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

13c Are there any TPO's in place?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council. Our records do not show any TPO's in place'

WASTE MANAGEMENT

14a Is there a proposed connection to the public foul mains sewer network?

'The advice we have is that it is unlikely that the site could be able to connect to public foul mains sewer and would therefore need a non-mains solution'

14b If no, What alternative approach is suggested – please give details? And at what cost?

'This is something that would be considered at the time of a planning application'

RELATED CASES

15a An outline planning application for housing development nearby was recently refused (13/1688). How do the reasons for refusal bear upon this case?

'This is a different case and the criteria for assessing G&T sites is set out in national policy. If you believe that there are issues we need to take account of, please put this forward in your representation'

NATIONAL DOG BREEDING CENTRE

16a The National Guide Dog Breeding centre is 1.3 miles away. Has the Centre made representations about concerns regarding the “potential for a new population of pet dogs of unknown health and vaccination status.....which could ‘carry diseases and therefore bring a serious risk of cross infection to our breeding stock and guide dog puppies’ (David Hurst Centre Manager).

‘The Centre made a representation at the last consultation in respect of its own land which was proposed as a possible site. The Centre may respond again to this consultation but as the consultation is still underway, we do not know at this stage’

SCHOOL PLACES

17a What is the nearest primary school and what is the nearest secondary school? And what is the distance to each school?

‘This information is within the Site Assessment information on our website

http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments

17b To what extent would travel to these schools be car dependent?

‘Unknown. We do not yet know which sites will progress into the Plan, the number of pitches or the number of families wishing to reside on each site and whether they would be car dependent or not’

17c Are these schools currently over subscribed? Please supply numbers

‘The information we have been given is within the Site Assessment http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments’

Any additional information you may require can be obtained from the Education authority, Warwickshire County Council'

17d Is it proposed that new schools would be built which would help to accommodate demand from the settled and traveller communities?

'There are three new schools to be built to the south of Warwick, Leamington and Whitnash as part of the new development sites which are being proposed through the new Local Plan. These schools would serve the needs of all students within the relevant catchment areas'

17e When will these new schools be built and where will they be located?

'This has not yet been decided. Additional school places will be required early in the Plan period and the needs arising from G&T sites will be taken into account in the phasing of this. The Local Plan will allocate land for development. The specific location and phasing of each element of the new development will be decided as part of the subsequent planning applications'

17f How will the educational needs of the children from traveller communities be met in the interim in the event of any current shortfall in places?

'See above. They will be assessed for places in the same way as children from the settled community. If additional information is required, please contact the Education authority at Warwickshire County Council'

CONTRACTURAL MATTERS/ SALE OF LAND

18a What safeguards would be built into the sale agreement with the developer to ensure (a) that the developer delivers a site/ and within a reasonable timescale – to support the timely achievement of unmet need targets? (b) is unable to simply re-sell the site for profit? (c) has the

financial where-with-all to fund the significant development costs required to deliver this site? (d) that financial penalties would be incurred in the event that site delivery did not occur within (say) 5 years?

'This is an issue to be advised by our legal department when a planning application is considered'

QUESTIONS TO WDC: GT15

GT5 Land East of Europa Way. Preferred Site (4 pitches)

1a What is the owner's response (WCC) to the proposed use of the site?

'Warwickshire County Council assisted us with identifying this land as a potential Gypsy and Traveller site'

PITCHES

2a Please confirm that there are 4 pitches proposed for this 'preferred' site?

'We have suggested up to 5 pitches on this site depending on size of pitch and layout'

2b What business use would WDC envisage taking place on any proposed G&T site?

The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process. Any business use would need to be ancillary to the residential use of the site and comply with Local Plan policy

FLOODING (The land has been reduced to take into account flooding)

3a What is the extent of flooding to the proposed site?

'The area that floods at times is to the north and east of this reduced site. The remaining land is in flood zone 1 according to EA mapping'

3b Does the land have a critical drainage problem?

'We are unaware'

3c Will a full flood risk assessment (FRA) be undertaken?

‘As part of a planning application, a FRA may be required’

3d If a FRA has been undertaken please send details

‘No FRA has been carried out in respect of this site as yet’

3e Are there any photographs or other evidence of the extent of flooding?

‘None that we are aware’

3f In what way has the land been ‘reduced to take account of flooding’ given that the eastern boundary of the site still runs alongside the Tach brook?

‘The land originally included that to the immediate north of the site completing the triangle’

NOISE (‘The site area has been reduced to avoid noise from major roads’)

4a Have noise measurements been taken of the noise levels from the Warwick by pass A452? If yes please send details

‘Not as yet. The sites are being considered as part of the Preferred Options consultation and these sites may not be those which go forward into the final plan. These more detailed pieces of evidence will be collected to inform the final choice of sites’

4b If no, when are these likely to be undertaken?

‘These more detailed pieces of evidence will be collected to inform the final choice of sites’

4c What is your view on the effects of noise levels on potentially vulnerable site occupants in mobile homes (both in terms of children using the outside environment and occupants seeking rest, respite and sleep)?

‘Advice will be taken on acceptable levels of noise to mobile home dwellers when the final choice of sites is to be made’

PEDESTRIAN ACCESS

5a What measures are proposed to instigate safe walking or cycling routes to and from the site as there appears to be none at present?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5b What traffic calming measures would be proposed & how much would this cost?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5c Is there a proposed 'field' walking or cycle route?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

VEHICLE ACCESS

6a Have precise access routes been drawn?

'There is an existing gateway into the site which Warwickshire County Council has advised would be acceptable if some of the vegetation is cut back to provide the required visibility splays'

6b Is WDC confident that appropriate visibility splays will be achieved by 'removal of vegetation'?

' This is the advice of the Highway Authority'

6c If visibility splays are possible, does WDC consider that (potentially large slow moving vehicles) could execute right turns safely?

'The advice of Warwickshire County Council has been sought on this issue'

6d What traffic calming measures would be proposed to ensure access and egress by slow moving vehicles to and from the site? And what would be the cost

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated. Slow moving vehicles (i.e. caravans, towing vehicles and trailers will however, rarely leave or arrive on a permanent site'

6e Do you agree that *'the distance of the site to key facilities and employment will promote car (and other vehicle) dependence in an area already noted for high volumes of traffic'*?

'This will depend very much on the occupants of the site and their employment location. Key facilities are not far from the site, but there may be a need for use of a car if public transport does not adequately serve the site. With so few pitches on the site however, this will add a very small % to the overall use of the route'

6f What is your estimate of how many car journeys per day could be generated at this location based on a 4 pitch site (for business, personal, school) including any services that may wish to make home based visits?

'WDC has no estimates. Warwickshire County Council highway engineers may have a way of estimating these figures'

ARCHAEOLOGY

7a Is there any evidence of prehistoric assets at this site (e.g. Romano British Crop Marks)?

‘Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available’

7c Have any relevant groups/ experts been consulted on the archaeological facets of this site?

‘Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available’

LISTED ASSETS

8a Can you confirm that there are no listed buildings or scheduled ancient monuments in the vicinity of the proposed site?

‘None that we are aware’

LAND QUALITY/ PROPOSED LEVELLING AND LAND LEVEL CHANGES

9a Do you agree that this land is not previously developed land and despite brief use for use relating to road construction has reverted to woodland?

‘We have suggested that as this land has only been used to accommodate spoil from the construction of Europa Way (and we are advised, was previously agricultural land) it would be classed as ‘not previously developed’

9b Are there any known contamination issues affecting the land?

‘None that we are aware’

9c There is a significant slope from the roadway down to the land which is not currently viable for caravans & vehicles to access or be sited upon. What land levelling changes would need to be implemented to make the site viable and at what cost?

‘Advice would need to be obtained if this site progresses to the allocation stage of the Plan’

9d Do you agree that *'The effects on the SA Objective relating to air, water & soil quality and prudent use of resources are considered to be major negative in the long term. This is because the development at the site could lead to the loss of the best and most versatile agricultural land (grade 3 (provisional) although is it not certain whether this includes grade 3a) and the site is in a sand and gravel safeguarded area. ?*

'The SA report has been prepared to advise of such issues and is one part of the evidence base to be taken be taken into account when a decision on sites is taken'

9e If 'yes' (i) what will be the potential impact on the community of this loss and (ii) what mitigation strategies are proposed to deal with this?

'N/A'

TRANSPORT INFRASTRUCTURE/ ACCESS TO SERVICES

10a Do you agree that 'in terms of effects on Health, the nearest GP services (Bishops Tachbrook) is within 1.6 miles with the site having poor access to public transport leading to minor negative effects'. If 'yes' what measures will be put in place to address this?

'The availability of public transport is one of the criteria by which sites are considered for suitability. Need will depend very much on the number of pitches to be provided and will be considered at the planning application stage'

10b What bus services (and numbers) pass this site. What is the frequency of the service (daytime, evening, weekday, weekend)?

'This information will be obtained at the planning application stage'

10c Given that it would be improbable to locate a bus stop at or near this site, how would safe and convenient access to bus services be achieved?

'The availability of public transport including the location of bus stops, is one of the criteria by which sites are considered for suitability. Need will depend very much on the number of pitches to be provided and will be considered at the planning application stage'

10d Are there any proposed improvements? And at what cost?

'The availability of public transport is one of the criteria by which sites are considered for suitability. Need will depend very much on the number of pitches to be provided and will be considered at the planning application stage'

10e Do you agree that *'The site consists of a thin strip of land to the East of Europa Way and is in close proximity to three other proposed Gypsy and Traveller sites at GT05 and GT06 which could lead to cumulative effects on: sustainable transport; the need to travel; health; local services and community facilities; landscape' ?*

'It is not intended that all of these sites would be progressed to the next stage of the Plan'

10f If yes, how do you propose to mitigate these effects?

'N/A'

ECOLOGY

11a What is the ecological/ biodiversity importance of this woodland or nearby Tach Brook?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

11b Has an ecology survey been undertaken and are mitigation/ preservation strategies and their associated costs known? If yes please send details

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

11c Are there any TPO's in place?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council. Our records do not show any TPO's in place'

11d How many trees would need to be removed to effect this development?

'This is detailed work which would be carried out in connection with a planning application'

WASTE MANAGEMENT

12a Is there a proposed connection to the public foul mains sewer network?

'The advice we have is that it is unlikely that the site could be able to connect to public foul mains sewer and would therefore need a non-mains solution'

12b If no, what alternative approach is suggested – please give details? And what would be the cost of this?

'This is something that would be addressed at the time of a planning application'

12c How would services be provided – running water – electricity etc? And at what cost?

'This is something that would be addressed at the time of a planning application and the cost borne by the landowner'

RELATED CASES

13a Are there any other proposed major developments in the close vicinity to this preferred site. Please give details

'It is possible that new developments may be proposed in the Local Plan which would be in close proximity to this site. These have not yet been determined however'

13b What other alternative uses have been proposed for this land?

'Unaware of any'

AREA IMPACT

14a What would be the impact on the visual amenity and landscape character of the proposed development?

'This will depend on where the pitches are located within the site and any mitigation by way of screening and landscaping carried out. This will be considered at the time of a planning application'

SCHOOL PLACES

15a Given the distances to local schools and absences of walking, cycling and transport routes, would you agree that this site is totally car dependent?

'Unknown. We do not yet know which sites will progress into the Plan, the number of pitches or the number of families wishing to reside on each site and whether they would be car dependent or not'

15b To what extent would travel to these schools be car dependent?

'Unknown. We do not yet know which sites will progress into the Plan, the number of pitches or the number of families wishing to reside on each site and whether they would be car dependent or not'

15c Are these schools currently over subscribed? Please supply numbers

'This information is within the Site Assessment information on our website

[http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments'](http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments)

15d Is it proposed that new schools would be built which would help to accommodate demand from the settled and traveller communities?

'There are three new schools to be built to the south of Warwick, Leamington and Whitnash as part of the new development sites which are being proposed through the new Local Plan. These schools would serve the needs of all students within the relevant catchment areas'

15e When will these new schools be built and where will they be located?

'This has not yet been decided. Additional school places will be required early in the Plan period and the needs arising from G&T sites will be taken into account in the phasing of this. The Local Plan will allocate land for development. The specific location and phasing of each element of the new development will be decided as part of the subsequent planning applications'

15f How will the educational needs of the children from traveller communities be met in the interim in the event of any current shortfall in places?

'See above. They will be assessed for places in the same way as children from the settled community. If additional information is required, please contact the Education authority at Warwickshire County Council'

CONTRACTURAL MATTERS/ SALE OF LAND

16a It is our understanding that the site would be transferred to WDC by WCC on request, whereupon WDC would sell the site to a private G&T

developer and thereafter funds received by WDC would be repaid to WCC.
Is this correct?

'That is the situation as we currently understand it'

16b Will the site be sold at full market rate? If yes, what would this 'factor in' the development potential value of the land? (e.g. 'preferred' status or higher)

'This has not yet been considered since it is not yet decided which of these sites will progress to the next stage of the plan'

16c What safeguards would be built into the sale agreement with the developer to ensure (a) that the developer delivers a site/ and within a reasonable timescale – to support the timely achievement of unmet need targets? (b) is unable to simply re-sell the site for profit? (c) has the financial where-with-all to fund the significant development costs involved in (e.g.) re-levelling/ access etc. that would be required to deliver this site? (d) that financial penalties would be incurred in the event that site delivery did not occur within (say) 5 years?

'This is an issue to be advised by our legal department when a planning application is considered'

QUESTIONS TO WDC: GTaltT01

GTALT01 'Brookside Willows Caravan Park' Banbury Rd (up to 10 pitches proposed) 'Preferred Site'

1a What is the owners response to the threat of CPO/ sale of the site?

'The Council has not threatened CPO, but stated a general intention to consider this route should there be insufficient land to meet evidenced need'

1b What communications have been sent to the land owner by WDC regarding possible CPO?

'CPO is a final resort for this Council and no CPO papers have been issued at this stage'

1c If the owner opened the Caravan Park and camping facility within the next 12 months and was subsequently CPO'd, where would the existing business be relocated?

'This would not be an issue since the owner would have implemented an extant planning permission and it is not the wish of this Council to close down businesses or cause them to relocate by developing on the land where they have implemented their permission'

1d Would the terms of a CPO recognise fully the significant sums of money invested in the site by the owner to render the land safe, improve access etc and the ensuing increase in the value of the site?

'The Council has not come to any decision as yet about the use of CPO other than an intention to consider its use should the need arise where we cannot meet the need for 31 pitches over 15 years, 25 of which should be delivered within the first 5 years'

PITCHES

2a What is currently the proposed number of pitches for this 'preferred' site?

'Although the site has capacity for 15 pitches, the Council is recommending a maximum of 10 pitches

2b What business use would WDC envisage taking place on any proposed G&T site?

'The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process. Any business use would need to be ancillary to the residential use of the site and comply with Local Plan policy'

2c Would it be the Council's intention to encourage growing numbers of pitches on this site (to accommodate future family growth) or even seek expand the site further e.g. by CPO?

'The Council has recommended a maximum of 10 pitches on this site and does not envisage more being accommodated here since the site is not large enough'

FLOODING (The land lies in Flood Zone 1,2 and 3)

3a What is the extent of flooding to the land?

'The Environment Agency's flood map shows that there is potential flooding to the north and along part to the south of the site. Tach Brook runs along the northern boundary. However, the site itself is on higher land and is not in flood zones 2 or 3'

3b Does the land have a critical drainage problem?

'We are unaware'

3c Will a full flood risk assessment (FRA) be undertaken? If a FRA has been undertaken please send details.

'As part of a planning application, a FRA may be required'

3d Are there any photographs or other evidence of the extent of flooding?

'Not that we are aware'

NOISE

4a Have noise measurements been taken of the noise levels from the main road? If 'no' when will these be undertaken?

'Not as yet. The sites are being considered as part of the Preferred Options consultation and these sites may not be those which go forward into the final plan. These more detailed pieces of evidence will be collected to inform the final choice of sites'

4b If yes, please send your measurements

N/A

4c What in your view is the effects of noise levels on potentially vulnerable site occupants in mobile homes (both in terms of children using the outside environment and occupants seeking rest, respite and sleep)?

'Advice will be taken on acceptable levels of noise to mobile home dwellers when the final choice of sites is to be made'

PEDESTRIAN ACCESS

5a What measures are proposed to improve the quality of walking routes to and from the site? (e.g. beyond the recently constructed footpaths along the frontage of the site)?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of

Warwickshire County Council will be sought on this issue should the site be allocated'

5b What traffic calming measures would be proposed & how much would this cost?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5c Is there a proposed 'field' walking or cycle route?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5d What would be the cumulative effect of new traffic from this site on traffic arising from other proposed developments?

'The advice of Warwickshire County Council would be sought on this if considering a planning application'

VEHICLE ACCESS

6a Is WDC confident that appropriate visibility splays will be achieved?

'We have taken the advice of Warwickshire County Council on this issue and are therefore satisfied that the visibility splays can be achieved. Furthermore, a required access lane has been incorporated into the highway on Banbury Road by the present owners; this being a planning condition attached to the permission for use as a holiday caravan park'

6b What traffic calming measures would be proposed to ensure access and egress by slow moving vehicles to and from the site? And what would be the cost of this?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

IMPACT OF A PROPOSED G&T SITE ON THE EXISTING HISTORIC LANDSCAPE AND POTENTIAL ARCHAEOLOGY

7a Is there any evidence of prehistoric assets at this site (e.g. Romano British Crop Marks)?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

7b Is there any other known archaeological significance to this site or surrounds?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

7c Is there any archaeological significance of the site relevant to Warwick Castle Gate?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

7d Have any relevant groups/ experts been consulted on the archaeological facets of this site?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

7e What liaison with English Heritage has been undertaken to assess the impact of a proposed development on the setting of a listed building?

'English Heritage is a statutory consultee and will respond as part of this consultation if there are impacts to be taken into account'

7f What would be the impact on the visual amenity and landscape character of the proposed development?

'A full assessment would be made at the time of a planning application and possible mitigation measures considered'

LAND QUALITY – There are known contamination issues affecting this land

8a Please describe all known contamination issues affecting this land – e.g. type of contamination on the land

'Relevant documents can be found attached to the previous planning application for a holiday caravan park and can be found here'

<http://planningdocuments.warwickdc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=WARWI DCAPR 59086>

8b Please describe the potential impact of known contamination issues on the health and wellbeing of potentially vulnerable occupants

'Relevant documents can be found attached to the previous planning application for a holiday caravan park and can be found here

<http://planningdocuments.warwickdc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=WARWI DCAPR 59086>

8c Please send copies of reports identifying that all conditions relating to contamination issues have been fully discharged

'Relevant documents can be found attached to the previous planning application for a holiday caravan park and can be found here

<http://planningdocuments.warwickdc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=WARWI DCAPR 59086>

8d What outstanding measures need to be implemented regarding any outstanding contamination issues, what are the associated costs of this and who would be responsible for implementing these in the event that the site became a G&T site?

'This advice would be sought of our Environmental Health team when considering a planning application'

8e What monitoring strategies are proposed to ensure that contamination issues are kept to a safe level?

'Relevant documents can be found attached to the previous planning application for a holiday caravan park and can be found here

http://planningdocuments.warwickdc.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=WARWI_DCAPR_59086

8f How is the site currently designated by the Environment Agency?

'Authorised landfill site'

TRANSPORT INFRASTRUCTURE/ ACCESS TO SERVICES

9a How often does a bus or buses pass the site?

'This information will be obtained if the site progresses into the draft plan stage'

9b What is the frequency of this bus service or services?

'This information will be obtained if the site progresses into the draft plan stage'

9c Are there any proposed improvements?

'This information will be obtained if the site progresses into the draft plan stage'

9d Is it feasible to locate a bus stop outside this site to improve take up of public transport?

'This information will be obtained if the site progresses into the draft plan stage'

ECOLOGY – there are known grass snakes/ protected species on the land or nearby

10a What is the ecological/ biodiversity importance of the land? (e.g. pond/ grounds/mature trees/ reptiles)?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

10b Has a recent ecology survey been undertaken and are mitigation/ preservation strategies and their associated costs known? If yes please send details

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

10c Are there any TPO's in place?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

WASTE MANAGEMENT

11a Is there a proposed connection to the public foul mains sewer network?

'The advice we have is that it is unlikely that the site could be able to connect to public foul mains sewer and would therefore need a non-mains solution'

11b If no, What alternative approach is suggested – please give details? And at what cost?

'This is something that would be addressed at the time of a planning application'

SCHOOL PLACES

12a What is the nearest primary school and what is the nearest secondary school? And what is the distance to each school?

'This information is within the Site Assessment information on our website

[http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments'](http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments)

12b To what extent would travel to these schools be car dependent?

'Unknown. We do not yet know which sites will progress into the Plan, the number of pitches or the number of families wishing to reside on each site and whether they would be car dependent or not'

12c Are these schools currently over subscribed? Please supply numbers

'This information is within the Site Assessment information on our website

[http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments'](http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments)

12d Is it proposed that new schools would be built which would help to accommodate demand from the settled and traveller communities?

'There are three new schools to be built to the south of Warwick, Leamington and Whitnash as part of the new development sites which are being proposed through the new Local Plan. These schools would serve the needs of all students within the relevant catchment areas'

12e When will these new schools be built and where will they be located?

‘This has not yet been decided. Additional school places will be required early in the Plan period and the needs arising from G&T sites will be taken into account in the phasing of this. The Local Plan will allocate land for development. The specific location and phasing of each element of the new development will be decided as part of the subsequent planning applications’

12f How will the educational needs of the children from traveller communities be met in the interim in the event of any current shortfall in places?

‘See above. They will be assessed for places in the same way as children from the settled community. If additional information is required, please contact the Education authority at Warwickshire County Council’

EMERGENCY SERVICES RESPONSE

13a Given that this site has not previously been considered for the proposed use, what is the response from the emergency services for such use?

‘We have had a response from the Police and they do not object or have comments to make on any of the sites proposed in the document. We await a response should one be forthcoming, from the other emergency services through the current consultation’

CONTRACTURAL MATTERS/ SALE OF LAND

14a What safeguards would be built into the sale agreement with the developer to ensure (a) that the developer delivers a site/ and within a reasonable timescale – to support the timely achievement of unmet need targets? (b) is unable to simply re-sell the site for profit? (c) has the financial where-with-all to fund the significant development costs involved in (e.g.) monitoring contamination, instigation of internal road ways etc. that would be required to deliver this site? (d) that financial penalties would

be incurred in the event that site delivery did not occur within (say) 5 years?

'This is an issue to be advised by our legal department when a planning application is considered'

QUESTIONS TO WDC: GT06

GT06 Land at Park Farm Spinney Farm (15 pitches) 'Alternative Site'

1a What is the owners response to the threat of CPO? Sale of the site?

'The Council has not threatened CPO, but stated a general intention to consider this route should there be insufficient land to meet evidenced need'

1b What communications have been sent to the land owner by WDC regarding possible CPO?

'The Council has not threatened CPO, but stated a general intention to consider this route should there be insufficient land to meet evidenced need therefore no papers have been sent to the landowner'

PITCHES

2a What business use would WDC envisage taking place on any proposed G&T site?

'The Council has not considered this aspect in relation to any potential site at the present time since it will be the requirements of each site owner/lessee that will determine any business use required and will be considered through the planning application process. Any business use would need to be ancillary to the residential use of the site and comply with Local Plan policy'

FLOODING (The land lies in Flood Zone 1)

3a What is the extent of flooding to the land?

'The Environment Agency maps show this site as being in flood zone 1'

3b Does the land have a critical drainage problem

'We are unaware'

3c Will a full flood risk assessment (FRA) be undertaken? If a FRA has been undertaken please send details

'As part of a planning application, a FRA may be required'

3d Are there any photographs or other evidence of the extent of flooding?

'Not that we are aware'

NOISE ('May be a noise issue connected to proximity of Warwick By- Pass in part')

4a Have noise measurements been taken of the noise levels from the By-Pass?

'Not as yet. The sites are being considered as part of the Preferred Options consultation and these sites may not be those which go forward into the final plan. These more detailed pieces of evidence will be collected to inform the final choice of sites'

4b If yes, please send your measurements. If 'no', when will this be undertaken?

'N/A'

4c What is your view on the effects of noise levels on potentially vulnerable site occupants in mobile homes (both in terms of children using the outside environment and occupants seeking rest, respite and sleep)?

'Advice will be taken on acceptable levels of noise to mobile home dwellers when the final choice of sites is to be made'

PEDESTRIAN ACCESS

5a What measures are proposed to improve the quality of walking routes to and from the site?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5b What traffic calming measures would be proposed & how much would this cost?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

5c Is there a proposed 'field' walking or cycle route?

'There are none proposed at present as there is no guarantee that this site will progress to become an allocated site. The advice of Warwickshire County Council will be sought on this issue should the site be allocated'

VEHICLE ACCESS

6a Have precise access routes been drawn? ('north of Park Farm)?

'The advice of Warwickshire County Council would be sought on this if considering a planning application'

6b Is WDC confident that appropriate visibility splays will be achieved?

'We have taken the advice of Warwickshire County Council on this issue and are therefore satisfied that the visibility splays can be achieved'.

6c What traffic calming measures would be proposed to ensure access and egress by slow moving vehicles to and from the site? And what would be the cost of this?

'The advice of Warwickshire County Council would be sought on this if considering a planning application'

IMPACT OF A PROPOSED G&T SITE ON THE EXISTING BUSINESS AND OCCUPANTS?

7a What would be the impact of a G&T site on the existing meat product manufacturing business?

'No doubt you will obtain the view of the landowner on this point'

7b What would be the impact on the residential amenity of occupants?

'No doubt you will obtain the view of the landowner on this point'

ARCHAEOLOGY

8a Is there any evidence of prehistoric assets at this site (e.g. Romano British Crop Marks)?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

8b Is there any other known archaeological significance to this site or surrounds?

'Warwickshire County Council archaeology officer comments are awaited and will contribute to the evidence base when available'

8c Have any relevant groups/ experts been consulted on the archaeological facets of this site? – including Castle Gate

'English Heritage is a statutory consultee and will advise if this is an issue'

LISTED ASSET – Proximity to Grade 1 listed Park and Garden at Castle Gate

9a What liaison with English Heritage has been undertaken to assess the impact of a proposed development on the setting of a listed building?

‘English Heritage is a statutory consultee and will advise if this is an issue. Any detailed assessment would be made at the time of a planning application’

AREA IMPACT/ LAND QUALITY

10a What would be the impact on the visual amenity and landscape character of the proposed development?

‘A full assessment would be made at the time of a planning application and possible mitigation measures considered’

10b Do you agree that *‘The effects on the SA Objective relating to air, water & soil quality are considered to be major negative in the long term. This is because the development at the site could lead to the loss of the best and most versatile agricultural land (grade 3 (provisional) although it is uncertain whether this is grade 3a?’*

‘The SA report has been prepared to advise of such issues and is one part of the evidence base to be taken into account when a decision on sites is taken’

10c What would be the effects on the local community of this loss?

‘Any thoughts on this would be pure conjecture on the part of the Council and not based on evidence’

TRANSPORT INFRASTRUCTURE/ ACCESS TO SERVICES

11a How often does a bus pass the site?

‘This information will be obtained at the planning application stage’

11b What is the frequency of this bus service?

'This information will be obtained at the planning application stage'

11c Are there any proposed improvements?

'This information will be obtained at the planning application stage'

11d Do you agree that the 'site has poor access to public transport and as a result this brings a small element of uncertainty against SA Objective 13 and also against SA Objective 3?

'Additional work will be carried out on the provision of public transport at the next stage of work in preparing the draft Plan'

11e What measures is WDC proposing to deal with this 'uncertainty'?

'Additional work will be carried out on the provision of public transport at the next stage of work in preparing the draft Plan'

11f Do you agree that the site is in close proximity to other proposed Gypsy and Traveller sites (e.g) GT15 and GT05 which could lead to cumulative effects on sustainable transport; the need to travel; health; local services and community facilities; landscape'?

'It is not intended that all of these sites would be progressed to the next stage of the Plan'

11g If yes, how do you propose to mitigate these effects?

'N/A'

ECOLOGY

12a What is the ecological/ biodiversity importance of the land? (e.g. pond/ grounds/mature trees)?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

12b Has an ecology survey been undertaken and are mitigation/preservation strategies and their associated costs known? If yes please send details

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

12c Are there any TPO's in place?

'You have received detailed reports on ecology prepared for WDC by Warwickshire County Council'

WASTE MANAGEMENT

13a Is there a proposed connection to the public foul mains sewer network?

'The advice we have is that it is unlikely that the site could be able to connect to public foul mains sewer and would therefore need a non-mains solution'

13b If no, what alternative approach is suggested – please give details? And at what cost?

'This is something that would be addressed at the time of a planning application'

CONTAMINATION – There are known contamination issues affecting this land (former landfill site on western third of site reduces the developable area)

14a Please describe all known contamination issues affecting this land – e.g. type of contamination on the land

'Unknown'

14b Please describe the potential impact of known contamination issues on the health and wellbeing of potentially vulnerable occupants

'This is something that would be addressed at the time of a planning application'

14c Please send copies of reports identifying that all conditions relating to contamination issues have been fully discharged

'We have none'

14d What outstanding measures need to be implemented regarding any outstanding contamination issues, what are the associated costs of this and who would be responsible for implementing these in the event that the site became a G&T site?

'Currently unknown'

14e What monitoring strategies are proposed to ensure that contamination issues are kept to a safe level?

'Unaware'

14f How is the site currently designated by the Environment Agency?

'Registered Landfill site'

SCHOOL PLACES

15a What is the nearest primary school and what is the nearest secondary school? And what is the distance to each school?

This information is within the Site Assessment information on our website

http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments

15b To what extent would travel to these schools be car dependent?

'Unknown. We do not yet know which sites will progress into the Plan, the number of pitches or the number of families wishing to reside on each site and whether they would be car dependent or not'

15c Are these schools currently over subscribed? Please supply numbers

'This information is within the Site Assessment information on our website

http://www.warwickdc.gov.uk/downloads/file/1712/gypsy_and_traveller_site_assessments

15d Is it proposed that new schools would be built which would help to accommodate demand from the settled and traveller communities?

'There are three new schools to be built to the south of Warwick, Leamington and Whitnash as part of the new development sites which are being proposed through the new Local Plan. These schools would serve the needs of all students within the relevant catchment areas'

15e When will these new schools be built and where will they be located?

'This has not yet been decided. Additional school places will be required early in the Plan period and the needs arising from G&T sites will be taken into account in the phasing of this. The Local Plan will allocate land for development. The specific location and phasing of each element of the new development will be decided as part of the subsequent planning applications'

15f How will the educational needs of the children from traveller communities be met in the interim in the event of any current shortfall in places?

'See above. They will be assessed for places in the same way as children from the settled community. If additional information is

required, please contact the Education authority at Warwickshire County Council'

CONTRACTURAL MATTERS/ SALE OF LAND

16a What safeguards would be built into the sale agreement with the developer to ensure (a) that the developer delivers a site/ and within a reasonable timescale – to support the timely achievement of unmet need targets? (b) is unable to simply re-sell the site for profit? (c) has the financial where-with-all to fund the significant development costs required to deliver this site? (d) that financial penalties would be incurred in the event that site delivery did not occur within (say) 5 years?

'This is an issue to be advised by our legal department when a planning application is considered'

13 Warwick District Gypsy and Traveller Sites Habitat Assessment

**Habitat Biodiversity Audit Partnership for Warwickshire,
Coventry and Solihull**

Warwickshire Wildlife Trust

Ecological Services Warwickshire County Council



December 2013

INTRODUCTION

The Habitat Biodiversity Audit (HBA) Partnership for Warwickshire, Coventry and Solihull has been surveying and maintaining the Phase 1 habitat surveys for the Warwickshire sub-region since 1995. In addition to the Phase 1 surveys the HBA incorporates the Local Wildlife Sites Project (LWSP) which identifies surveys and processes the Local Wildlife Sites (formerly Sites of Importance for Nature Conservation – SINCs) inventory for Warwickshire, Coventry and Solihull.

In 2012 the HBA Phase 1 habitat survey data was scored according to a set of habitat criteria introduced by Natural England as a pilot project for biodiversity off-setting. Warwickshire is one of the first pilot areas for trailing biodiversity offsetting using the Phase 1 habitat dataset.

In addition to the biodiversity offsetting scoring the Phase 1 habitat data has also been used for modelling habitat connectivity for woodlands and hedgerows, grasslands and wetlands.

Warwick District Council Gypsy and Traveller Sites assessments

The Warwick District Gypsy and Traveller Sites Habitat Assessment follows on from the Warwick District Council Landscape Sensitivity and Ecological and Geological Study Report commissioned by Warwick District Council November 2013. The Gypsy and Traveller Sites Assessment is a rapid assessment of 15 priority sites based on the Phase 1 habitat surveys summarised by using the distinctiveness scores together with habitat descriptions taken from the Phase 1 target notes. In addition to the distinctiveness mapping the commentary has also assessed the likely impact of any development on designated areas such as existing and potential Local Wildlife Sites and the importance of maintaining connectivity between distinctive habitats.

The majority of the sites assessed have Phase 1 survey information that is within the last five years, however some of the information is outside of the 5 year time frame and has had to be assessed using the latest aerial imagery (Summer 2013) supplied by Warwickshire County Council. It is recommended that where sensitive sites have been identified and the information is not within the 5 year time frame then a site visit be undertaken at the appropriate time of the year.

HBA Phase 1 habitats

For a detailed description of the Phase 1 habitat survey methodology please refer to the JNCC Handbook for Phase 1 habitat Survey (JNCC, 2010) and the HBA Phase 1 Survey Guidance Notes (Habitat Biodiversity Audit, 2012). The distinctiveness scoring methodology (Defra, 2012) is available on Defra's website at:

<http://www.defra.gov.uk/environment/biodiversity/uk/offsetting/>. The biodiversity offsetting definitions and criteria for Warwickshire amended 10/05/2013 are available from Ecological Services Warwickshire County Council.

The recent ecological reports commissioned by Stratford District Council (WCC Ecological Services & Habitat Biodiversity Audit, July 2012) and Warwick District Council (WCC Ecological Services & Habitat Biodiversity Audit and WCC Landscape Architects, November 2013) describing the ecological habitat assessments using the distinctiveness and connectivity scoring methodology are available from both authorities.

Species Records

Species information is based on existing records within the Warwickshire Biological Record Centre (WBRC). For this report EU and UK protected species, UK Biodiversity Action Plan, local Biodiversity Action Plan species and rare and endangered species have been noted where records are

held digitally. These records have been used with local knowledge to provide spatial interpretation for each site.

This interpretation is based on data and information available at the time of preparing this report. Please note that lack of records may well indicate that no survey work has yet been undertaken, and does not indicate that species are necessarily absent. Protected species may be using the site and surrounding area and appropriate survey work may be required to establish their presence and to inform mitigation measures to ensure that they are not impacted by any proposed works.

MAP GT05 LAND AT TACHBROOK HILL FARM

Area: 6.38 ha

Overview

A single field of improved grassland, to the south-east and within the site boundary is a large pond surrounded by dense scrub. The site is surrounded by similar fields and is separated by largely intact hedgerows. The northern and western field boundaries along the Banbury and Mallory Roads have narrow sections of semi-natural woodland.

Key Features

- Ponds both inside the site boundary and nearby in adjacent fields
- Semi natural woodland along site boundary

Habitat Description

The main habitat/land-use for this site is shown as improved grassland (B4) due to the dominance and intensity of the grazing. The modification of the grassland restricts the diversity of other flowering plants and reduces its distinctiveness.

The pond (G1) on the site has potential ecological value given that is close to the field boundary and surrounded by scrub. There are three other ponds within a 500 m radius giving connectivity

The two sections of broad-leaved semi-natural woodland (A111) are important habitats as well as contributing to the network of wildlife corridors through the intensively farmed landscape.

Protected Species

There are no protected or important fauna records within the site. Great crested newt, hedgehogs and bats (indeterminate species) have been observed within 500m of the site boundary. County rare flora records within 500m include mouse-tail and green figwort.

On this basis we do not anticipate that protected or locally rare and endangered species will preclude the proposed gypsy and traveller sites from proceeding. However, should the proposal go ahead, we recommend that protected species are taken into consideration through more detailed ecological assessments. Please note that an absence of species records does not mean absence of species.

Recommendations

The ponds should be retained and surveyed for Great Crested Newts. Consider further pond restoration for the area.

The hedgerows should be retained and their connectivity to the small areas of woodland maintained and enhanced wherever possible.

MAP GT06 LAND AT PARK FARM AND SPINNEY FARM

Area: 14.59 ha.

Overview

Site GT06 bisects five fields of grazing grassland. The southern boundary of the site runs along the A462 Warwick Road by-pass. Along the north eastern boundary runs the A452. Park Farm is on the eastern edge of the site. To the east and west of the site are grazed fields. The fields are divided by hedgerows. Along the southern boundary of the A426 is a line of trees and along the A425 the linear trees merge into a hedgerow with trees.

Key Features

- Hedgerows Linear trees Road verges

Habitat Description

The fields making up site GT06 are shown as agriculturally improved grasslands (B4) with a low distinctiveness value. The road verge along the A452 southern boundary edge of the site is shown as dense continuous scrub (A21) which merges with the linear trees (A3). Along the A425 eastern boundary the road verges are shown as poor semi-improved grassland (B6) which is also shown around Park Farm.

To the west of the site is small mixed plantation woodland (A132) with a land draining running through it (G2). Alongside the drain is some linear scrub (A21).

Some of the hedgerows through the fields are intact (J21), some are now defunct (J22) and some of the field boundaries are now fenced (J24). The hedgerow and connectivity throughout the site and surrounding area

is poor, in particular the connection to Nursery Wood LWS (SP26W5) in the north.

Protected Species

There are no protected or important fauna records within the site. Barn owl, adder and badger have been observed within 500m of the site boundary.

On this basis we do not anticipate that protected or locally rare and endangered species will preclude the proposed gypsy and traveller sites from proceeding. However, should the proposal go ahead, we recommend that protected species are taken into consideration through more detailed ecological assessments. Please note that an absence of species records does not mean absence of species.

Recommendations

Consider reinstating and retaining hedgerows in order to improve connectivity throughout the site.

Maintain roadside verges as semi improved grasslands with associated tree and shrub linear features.

MAP GT15 LAND EAST OF EUROPA WAY

Area: 0.9 ha

Overview

GT15 is a small triangular section of a broad-leaved plantation totalling 2.5 hectares. The A452 Europa Way runs alongside the eastern edge of site. To the south is a large arable field. On the western edge of the site is the continuation of the woodland beyond which is Tach Brook and then a large arable field. The woodland is surrounded by linear scrub.

Key Features

- Broad-leaved plantation
- Linear scrub
- Waterway

Habitat Description

GT15 is part of a larger broad-leaved plantation (A112) consisting of a mix of tree species including white poplar (*Populus alba*), oak (*Quercus robur*), ash (*Fraxinus excelsior*), larch (*Larix sp.*), hazel (*Corylus avellana*), lime (*Tilia x europaea*) and horse chestnut (*Aesculus hippocastanum*). The plantation is relatively young and the ground flora is mostly a mix of coarse grasses, and common nettle (*Urtica dioica*) with occasional herbs including cut-leaved crane's-bill (*Geranium dissectum*), creeping buttercup (*Ranunculus repens*), meadow vetchling (*Lathyrus pratensis*), smooth tare (*Vicia tetrasperma*) and yarrow (*Achillea millefolium*), indicators of shaded grassland overplanted with trees.

The plantation has areas of wetter ground with willow (*Salix sp.*), hogweed (*Heracleum sphondylium*), great willowherb (*Epilobium hirsutum*), lesser pondweed (*Potamogeton pusillus*) and both hard (*Juncus inflexus*) and soft rush (*Juncus effuses*).

The linear scrub (A21) is mostly made up of hawthorn (*Crataegus monogyna*) and bramble (*Rubus fruticosus agg.*) forming the woodland edge which is an important wildlife habitat that also contributes to habitat connectivity.

Tach Brook (G2) flows through the plantation and is a tributary of the River Avon which is a Local Wildlife Site (LWS SP15Li8f). The Tach Brook is part of the arterial network of tributaries and wildlife corridors which are an intrinsic feature of the River Avon itself and is part of the Avon LWS designated area.

At the northern most end of the plantation lie's Turnbullus Garden; a potential Local Wildlife Site (pLWS SP26w3) and an area of semi-improved grassland (B22) with scattered ponds (G1). The southern extent of the plantation has an area of poorer semi-improved grassland (B6).

Protected Species

There are no protected or important fauna records within the site. Badgers and water voles have been observed within 500m of the site boundary.

On this basis we do not anticipate that protected or locally rare and endangered species will preclude the proposed gypsy and traveller sites from proceeding. However, should the proposal go ahead, we recommend that protected species are taken into consideration through more detailed ecological assessments. Please note that an absence of species records does not mean absence of species.

Recommendations

The proposed site is approximately a third the plantation area and would impact on the development of the broad-leaved plantation which has a variety of tree species with a developing understory and ground flora. If properly managed the woodland could mature into semi-natural woodland.

There was no information available on the current management of the plantation so this would need to be determined before making any recommendations. Given the mix of habitats in the area, including the broad-leaved woodland, mixed grassland and the watercourse makes this a site that should be maintained as part of the wider area for its wildlife interest.

MAP GTALT01 BROOKSIDE WILLOWS, BANBURY ROAD

Area: 4.48 ha

Overview

GTAL01 Brookside Willows is a linear area of former mixed plantation which has been removed since the last Phase 1 survey. The woodland remains around the perimeter of the site. The site appears to have been developed recently with areas of bare ground and short ephemeral vegetation.

To the south is a large arable field and to the north is an extensive area of plantation woodland shown on the map as Turnbulls Garden which forms part of the Warwick Castle Park woodland

The Tach Brook runs along the northern edge of the site boundary and Turnbulls Garden plantation woodland.

To the west is the entrance to the site from the Banbury Road and Nursery Wood. On the eastern side is an area of semi-improved grasslands and ponds.

Key Features

- Water courses and water bodies
- Woodlands

Habitat Description

The former mixed woodland (A132) has largely been removed and is now a mosaic of bare ground and ephemeral vegetation (J13). Ephemeral and

short perennial habitats are characterised as having short, patchy plant associations typical of urban sites, quarries and railway ballast. As such they are generally transient habitats liable to change and occupy a low distinctiveness score because of this.

Around the perimeter of the site the mixed woodland has been retained mostly with Ash and a stand of cedars at the eastern end of the site. The Tach Brook (G2) runs along the northern section of the site which separates it from Turnbolls Garden which is classified as a broad-leaved plantation (A112) consisting mainly of ash and aspen with occasional willow and sycamore. Turnbolls Garden is noted as a potential Local Wildlife Sites (pLWS SP26W3).

Tach Brook is part of the arterial network of tributaries and wildlife corridors which are an intrinsic feature of the River Avon itself and is part of the Avon LWS designated area (LWS SP15Li8f).

To the south of the site is Brookside Willows a large field of improved grassland. The field does have a pond (G1) surrounded by mature trees. To the east of the site are two small pools fringed with rushes (*Carex* sp.) and enclosed by neutral semi-improved grassland (B22) and occasional scattered scrub (A22).

Across the Banbury Road from the site are New Waters Local Wildlife Site (LWS SP26W1) and Nursery Wood Local Wildlife Site (SP26W5). New Waters LWS is a large lake within Warwick Castle Park noted for its breeding population of water rail (*Rallus aquaticus*) and Cetti's warbler (*Cettia cetti*).

Protected Species

There are records of otters, a European protected species, within the site. Adder, water vole, noctule and common pipistrelle bats have been

observed within 500m of the site boundary. It is not likely that water voles will be affected by the site unless a watercourse passes through.

On this basis we do not anticipate that protected or locally rare and endangered species will preclude the proposed gypsy and traveller sites from proceeding. However, should the proposal go ahead, we recommend that protected species are taken into consideration through more detailed ecological assessments. Please note that an absence of species records does not mean absence of species.

Recommendations

The areas around the site consist of a mosaic of highly distinctive habitats, including semi-natural woodland, semi-natural and marshy grassland, ponds and streams. Turnbolls Garden pLWS should be surveyed as a Local Wildlife Site which should incorporate the area of pools and semi-natural grassland along the Tack Brook. The site, if developed should retain a buffer and wildlife corridor along the Tach Brook.

14. 'Areas of search' Highways response to sites listed above

This information below was received from WCC on the 16th of April 2014

Potential Gypsy & Traveller sites and 'Areas of Search' – Highway Authority response

GT05 Land at Tachbrook Hill Farm, Banbury Road:

Access taken from the A452 would require visibility splays of 2.4m x 160m. Use of the existing Tachbrook Hill Farm access would not be recommended as it is sited opposite an existing junction and it would not be recommended to locate the access any closer towards the Motorway junction.

If access were to be created northwest of the existing Tachbrook Hill Farm access it should be done so in advance of the existing traffic calming features.

Access from Mallory Road would not be recommended. It should also be noted that there may be issues regarding forward visibility due the existing vertical alignment of the road. Forward visibility to match visibility from the access would be required at all sites (160m in this instance).

GT06 Land at Park Farm:

Access created from the A425 would need to have visibility of 2.4m x 215m in both directions. The existing access to Park Farm is likely to meet this standard. If a new access is to be created it is unlikely that an access could be created any closer to the existing roundabout without the

requirement for removal of hedgerow/trees. Any access created North West of the Park Farm access must adhere to the required visibility standards. The access should not be created in proximity of the existing layby on the A425.

GT15: Land to east of Europa Way:

This section of the A452 is subject to a speed limit of 50mph and accordingly, splays and forward visibility of 160m must be provided. It is considered that, with removal of vegetation, this should be achievable at some point along the boundary line shown.

GTalt 01 Brookside Willows, Banbury Road Highway Observation:

Access:

There is an existing access on Banbury Road which has recently been constructed to serve Brookside Willows; this is going to be a caravan park. The access has been constructed to Highway standard.

Carriageway:

Banbury Road is 10.7 metres with a right hand turning lane.

Footway:

There is a footway adjacent to the site.

Visibility Splays:

Banbury Road is subject to a 50mph speed limit where visibility splays of 2.4m x 160m are required in both directions this can be achieved.

Sustainability:

There are no existing street columns down Banbury Road. There are no bus stops within the recommended walking distance.

Conclusion:

Banbury Road can accommodate caravans and large vehicles that are likely to access the site.

GTalt 05 West Of Europa Way

Highway Observation:

Access: There is no existing access on Europa Way to the site.

Carriageway:

Europa Way has a high volume of traffic, and can accommodate for two way traffic flow.

Footway: There is no footway fronting or adjacent to the site.

Visibility Splays:

Europa Way is subject to a 50mph speed limit where visibility splays of 2.4m x 160m are required in both directions. In the southern direction visibility cannot be achieved due to the roundabout; however visibility can be achieved to the roundabout where vehicles will be travelling cautiously. In the northern direction visibility can be achieved.

Sustainability: There are Street columns present around the roundabout.

There are no bus stops within the recommended walking distance.

Within the last 3 years there has been a number of accidents, with 2 being fatal adjacent the site.

Conclusion:

Europa Way serves a high volume of traffic, where accident rates are high therefore; this site is not suitable to serve caravans.

15 Bishop's Tachbrook Parish Council 'Engagement day' (15th April 2014) Verbatim Comments

GT05

- Close to M40 and A452 with accompanying noise pollution and access issues.
- Already difficulty to exit village on A52
- Flooding issues on Mallory Road
- Proximity to Village Incompatible with wanting to live apart from settled community.
- Small village facilities-part time surgery, single form entry primary school
- Visual impact on area
- Can school facilitate the children and any special needs alongside the new housing development
- Field floods
- Noise generated from site
- Main road into village already dangerous
- In 1992 all BT residents were compensated for noise pollution due to siting of M40. GT05 is closer to M40 than BT village. By the precedent set for compensation this makes the site unsuitable for Caravans due to noise. A452 is a main arterial route to M40(s) and to Gaydon Site from Leamington Warwick making this an extremely busy road especially during morning and evening rush hour.
- Totally unsuitable. Good agricultural land. Will have developmental impact on the approach to the village.
- Exit onto the lane and or main road will be dangerous. Too close proximity to houses.
- Photographic evidence supplied of flooding
- Too much of a vast open space

- Compulsory purchase is unfair in order for the G&T community to operate the site as a business.
- Busy main road surrounding the site.
- No mains set up
- No footpath to school/ docs etc.
- Not suitable for business use.
- Busy junction
- School and Local GP surgery already oversubscribed
- Visual Impact
- Objection – Dangerous Junction
- Not a great entrance to the village
- Only 10 minute walk from Oakley Wood (via wide verge) and opposite guide dogs breeding centre, so not a good idea
- Accident black spot
- Water logged running across the road
- Visual impact on entering village.
- Compulsory purchase would be required
- Cost to taxpayer
- Objection – subject to flooding
- Objections – adjacent to very busy Banbury road
- Adjacent to a very bad junction – many previous accidents
- North west corner subject to flooding
- Not a level site
- Very bad impact in visual amenity when travelling south on the Banbury road
- Objection – Hill Farm – Loss of visual impact on open county landscape
- Objection – site not suitable for business use.
- Objection – very close to extremely busy road and dangerous junction
- Most unsuitable site – Busy road junction
- Unpleasant vista entering the village

- Too close to village if site used as a business use site, noise would be a problem
- Doctors surgery only part time
- Can only be obtained by compulsory purchase
- Objection – risk of flooding
- Road access onto 2 busy roads which are already and accident black spot
- Impact on environment-visual impact etc.
- A452 is a death trap. Pulling out of turning onto. There have been many fatalities at that junction and near it
- Dangerous turning into Village
- Visually damaging to our beautiful village
- Road to busy (Banbury Road)
- No footpaths, no bus route
- Reputation damage to our primary school
- As drivers drive towards the motorway on the A452 towards going onto junction 13, they increase their speed before going onto the slip road
- The access from the farmers drive there is a blind spot at the brow of the hill so very dangerous for pulling out of and turning into
- Visual impact for village would be horrendous
- Strongly object – makes an already junction more dangerous
- Adverse visual impact
- Not suitable for business use
- Prone to flooding
- Local school already over-subscribed and not footpath to village
- Compulsory purchase necessary
- Disturbance to guide dog breeding centre Oakley wood road and crematorium
- Land owner very reluctant to sell land – compulsory purchase would be a protracted process
- Strongly object because of impact on village approach

- Size out of proportion with village area
- Very dangerous road junction
- Impact on BT facilities – school surgery shop
- Flooding frequently
- Disastrous effect on rural landscape
- Need to compulsorily purchase Tachbrook (Hill Farm)
- Accidents and fatalities at this junction
- Too close to very busy roads
- accident prone junction
- site susceptible to flooding
- compulsory purchase required
- adverse visual impact on open countryside
- high negative impact on immediate area –Oakley wood is protected
- concerned about impact on Guide Dog Breeding centre chose for is safe location for breeding and quietness
- compulsory purchase would be required
- flooding from field running through gardens onto the road
- flooding field and running across the road
- objection – visual impact on entering the village
- should be left for farming
- already hazardous junction – accident waiting to happen
- eyesore for the village entrance
- liable for flooding
- accident black spot
- local school is cannot accept more children especially with special needs
- Oppose – impact on countryside
- Mallory road like a racetrack now –more would be out of order
- Business use would destroy visual amenity
- Site not suitable for business use
- Does not have any connection to services to provide sustainability (sewage/ water etc.)

GT06

- Would harm the rural buffer zone and destroy the visual amenity on the approach to Warwick
- Severely restricts access for the owner of park farm to his remaining land
- Proximity to major roads A452 and A425 with accompanying road noise pollution and access issues
- Visual impact on entrance to historic Warwick
- Already been used for construction company for road alterations
- ?compulsory purchase expensive
- Visual impact on countryside
- Compulsory purchase necessary and would be resisted (probably)
- Adverse effect on viability of the farm business
- Adverse visual impact on the countryside
- Owner not willing to sell – expense of compulsory purchase
- Objections – access to busy road
- A good alternative – better than village
- Which school would the children attend? BT would it cope alongside new housing development
- Is this site set for facilities needed by Gypsies and Travellers
- Adjacent to very busy roads
- With Bar wood application for the Asps, includes schools etc., surely this site (and Brookside) would have less impact on village and amenities.
- As an alternative, better than GT05
- Easy access to Leamington
- Road access onto A425
- Close to other proposed site GT01
- Access to schools in Warwick Leamington
- My second preference but access onto busy road

- Impact on rural landscape and approach to Warwick Castle tourist attraction
- Compulsory purchase required
- No Bus route
- No access to facilities
- Park Farm ought to be “preferred” and Europa way, ”alternative”
(x2)

GT15

- Access onto Europa Way would be dangerous
- BT would have to serve the community but capacity at school is questionable
- Doctors surgery is already under pressure
- No bus route into Bishops Tachbrook Warwick or Leamington
- GT15 is opposite busy trunk feeder
- BT school and Surgery are already under pressure.
- Minimal visual impact
- Not suitable. Floods regularly
- Access onto and off v fast road
- Heavily wooded - no facilities
- Steep sloping ground
- Road access would need improving
- Second preferred site over GTalt01
- Minimal visual impact – well screened
- Access would appear to cause problems
- No compulsory purchase required
- Busy road
- Only small site and therefore more sites needed (no doubt in Tachbrook)
- No pavements
- On motorway feeder
- Not on bus route
- On busy road accompanying road noise and pollution and access issues
- Concerns over flooding and water contamination
- Small manageable site
- Closer to urban area for employment services education and health
- Would require clearing woodland
- After Brookside Willows, the most suitable site
- Screen from road

- Close to Leamington for doctors etc.
- Land owned by Council
- Busy road access already an accident hazard site.
- Trees would have to be felled increasing flooding
- No pavements on Europa Way or access to public transport on foot hence the nearest facilities are not accessible.
- Very busy main road access
- Land floods
- No pavements/ public transport
- Obviously some trees will have to be felled therefore not so well screened
- Well screened. Minimal visual impact
- Busy road
- No site set up.
- The crazy option!! Road access and fast main Europa Way would need traffic calming measures
- Already owned by the council
- Already owned by the council
- Reasonable screening and access
- Low visual impact
- Already owned by Council

Gtalt01

- Ideal location well screened
- Site already part prepared
- Good road access
- Needs a safe pedestrian footpath into Warwick
- No immediate neighbours
- Infrastructure already in place
- Well away from main road
- Screened
- Preferred site
- Good access to site already there
- Easy access to Warwick Town by Public transport/ on foot
- Less traffic than other main roads locally
- Reused ground - no flooding
- Good site
- Planning for Caravan Site anyway: minimal difference
- Facilities already in existence
- Road access, screening etc. in place
- No compulsory purchase necessary
- Minimum development needed for occupation
- Already partially developed
- Able to be well screened to minimise visual impact
- Preferred – (least worst)
- Set back off road
- Cars have to slow because of T/ light approach – safer option
- Planning permission approved for a caravan park
- More suitable than some of the alternatives
- Well set back from the road
- Was originally well screened – trees can be replanted.
- Problem entering Warwick over bridge

- Very Close to Warwick parkland – will there be plans put in use regarding access from this site to the park?
- When this site was being used for Landfill, vehicles turning right into it presented considerable danger to other vehicles travelling towards Warwick. Road is even busier now of course. The reality is that drivers do not take care as they go around the bend in the road and being on down slope braking distances is increased.
- Concerns over proximity to water what is the direction of flow?
- Need to overcome contamination issues
- Visual impact entering historic Warwick
- Already designated as a site for caravans
- Well screened from road with trees
- Meets ½ the number of pitches required
- Preferred site: already on main road
- Set away from people already homed
- No major impact on surrounding area
- This makes sense: far away from main road not to be seen and already Planned as a caravan park.
- Preferred site as long a screening is maintained
- Basic work already completed
- Reasonable road access
- Access to Warwick Castle Park would need to be controlled
- This is the least worst options
- Access and facilities already there.
- Preferred option:-site partially developed. Has independent access.
No major impact on surroundings
- Already partly developed
- Discreet
- Will not devalue the surrounding area
- Well screen
- Has specific road access
- Already partially developed

- Preferable However!! If site on Harbury Lane is passed, then there will be 2 sites affecting/ impacting Warwick Gates
- Preferred: Facilities already in place. Road access is in place and screening
- Most suitable site
- Best access (and safest)
- Quiet location and screen from road.
- Good access and screening
- Already partly developed
- Established infrastructure screened and well shielded and safe
- No 1` preferred
- Preferred site. Infrastructure already exists
- Good road junction