

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

R - 9826
A - 9827

Your Ref:
Our Ref: JMP/DRUMM/13/1275

15 July 2013

RE: Consultation on Sites for Gypsies and Travellers document

We write further to your invitation to submit comments in relation to the above which lists some twenty possible Gypsy and Traveller site options. On behalf of our client EC Drummond (Agriculture) Ltd we wish to register our strong objection to Option Site GT03- Land at Barnwell Farm, Harbury Lane and GT04: Land at Harbury Lane, Fosse Way being identified as potential Gypsy and Traveller Sites for the reasons outlined in this correspondence.

The Government's approach to planning policy for Traveller sites is set out in the Department for Communities and Local Government document 'Planning Policy for Traveller Sites' dated March 2012.

Paragraph 4 lists the Government's aims in respect of Traveller sites which include amongst others increasing the number of Traveller sites in **appropriate locations** to enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure.

When decision taking paragraph 23 states that Local Planning Authorities should strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

Further guidance on selecting **appropriate locations** for Traveller sites is contained within the Government's good practice guide: *Designing Gypsy and Traveller Sites*.

WDC PLANNING
Ref
Officer
16 JUL 2013
SCANNED
CC CR PD MA
PRE GEN DIS

Paragraph 3.1 identifies that selecting the right location for a site is of key importance and advises that poorly located sites will have a detrimental effect on the ability of residents to:

- Seek or retain employment
- Attend school, further education or training
- Obtain access to health services and shopping facilities.

Paragraph 3.3 expands further and states:

'It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children. All prospective site locations should be carefully considered before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk.'

Furthermore paragraph 3.6 states that sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply. These circumstances would be where the location is unsuitable for housing, for practical and technical reasons which would not adversely affect the health and safety of Gypsy and Traveller residents or the sustainability of the site.

Paragraphs 3.7 to 3.12 discuss the relationship of potential sites to surrounding land use and advises that where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments. It is acknowledged that many Gypsies express a preference for a rural location which is on the edge or closely located to a large town or city. Sites adjacent to light industrial areas therefore tend not to be popular because of their isolation, distance from local facilities and because of safety fears (when walking home at night for instance).

In summary it is clear from the advice set out in Government guidance that the selection of sites in the right location is extremely important and isolated rural locations adjacent to industrial areas are considered unpopular. The following section sets out in our professional opinion, and on behalf of our client, reasons why we consider the rural area around Barnwell Farm to be unsuitable for the residential accommodation suggested to be required.

Suitability

Land around Barnwell Farm is generally green field agricultural land located in a rural landscape between the settlements of Bishops Tachbrook and Harbury. Due to its rural location and relatively undeveloped nature the land generally lacks essential and necessary infrastructure. It should be noted that Barnwell Poultry Farm for example has its own borehole as a means of water supply and the site has no mains drainage and utilises a septic tank system. Significant investment would therefore be required to provide access to connect to mains infrastructure.

Land use in the surrounding area is predominantly agricultural, however in the immediate vicinity is an industrial area containing a large reclamation and scrap vehicle breakers yard which can, by its very industrial nature, generate noise nuisance. Also on the opposite side of the lane is Leamington Football Club.

To further justify why we consider this location to be undesirable for the residential accommodation suggested we consider it necessary to expand upon the working operations and resulting environmental issues associated with Barnwell Farm which is an intensive poultry farming operation housing up to 315,000 birds.

By way of background planning permission was granted in 1996 under ref W/96/1095 for the erection of six poultry houses. Each poultry house contains approximately 50,000 chickens that are brought to the site as day old chicks and are reared as part of an 8-10 week process. Birds in each poultry house are at staggered stages of development as the farm operates in a phased cyclical manner.

The application was accompanied by a thorough and detailed environmental assessment which considered matters such as noise, air quality (odour), waste, traffic movements etc.

Noise considerations

The intensive poultry farm operates in a phased manner and the cycle for each poultry house can overlap resulting in the following traffic movements for each cycle as summarised below:

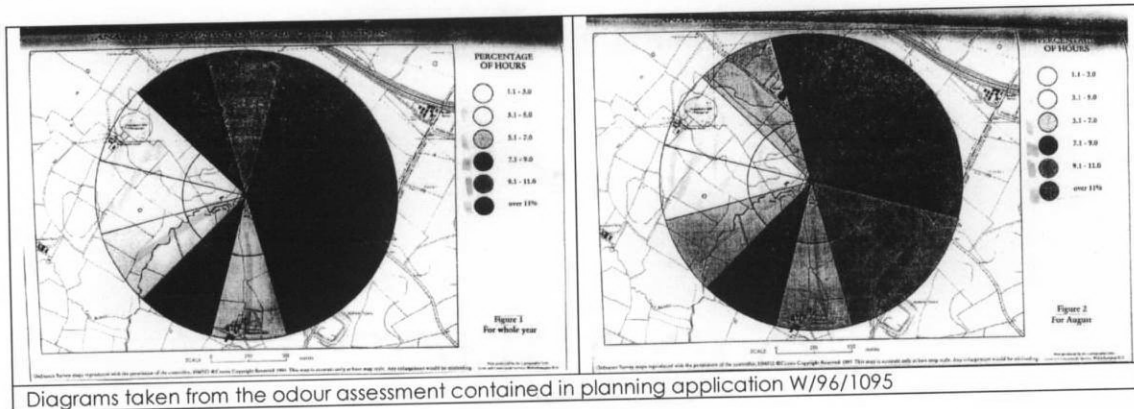
Week No	1	2	3	4	5	6	7	8	9	10	Total
Feed lorries	2	4	7	9	10	12	8	9			61
Chick Lorries	4										4
Litter lorries	3										3
Gas Lorries	1										1
Bird Depletion						22		22			44
Muck removal									48		48
Personal Vehicles	1		1			2		2			6
Vet/Fieldsmen											
Total	11	4	8	9	10	36	8	33	48		166

It should be noted that these traffic movements for each cycle (6) are unrestricted and can take place at any time of the day or night, 7 days a week. My client advises that the vast majority of movements take place during the night which may therefore give rise to residential amenity noise concerns should the accommodation sought be located in proximity to Barnwell Farm. In addition to the above automated feed, heating and ventilation systems are in operation 24 hours a day which furthermore could give rise to further possible noise disturbance.

Odour Considerations

Like many other intensive livestock operations, and given the nature of the poultry farm, the use generates a significant amount of waste which can on occasion give rise to odour emissions. The odour assessment which was submitted as part of the original application examines wind direction and odour emissions resulting from the

use of the site as an intensive poultry operation. The following diagrams (taken from the assessment) show how odours plume and disperse from the site.



As the above diagrams demonstrate, and the point we wish to draw to your attention is that odour emissions from the site generally travel in an easterly direction over and across Option sites GT03 and GT04.

Whilst, to our client's knowledge, there has been no complaints in recent years to your Council's Environmental Health Department (EHD) relating to odour nuisance from Barnwell Farm, we wish to draw your attention to the fact that the site has had a history of complaints being made to the EHD by people living in the surrounding area. This broad location is therefore considered to be an undesirable location to reside.

Bio security

Further to the above our client is also extremely concerned about the potential bio security risks associated with a greater amount of people frequenting the area. Bird flu is spread by people and given the transient nature of the Gypsy and Traveller lifestyle the potential risk of a bird flu outbreak would likely be increased and could have extremely serious consequences upon the agricultural business.

Summary

In summary for the environmental reasons outlined above this type of agricultural land use is typically located in rural areas away from where people reside. Should our client wish to erect an intensive poultry farm operation in proximity to residential areas, we would anticipate receiving strong resistance and opposition from local residents who would likely raise residential amenity and environmental concerns as discussed above. It is therefore considered in our professional opinion that this location is not appropriate or suitable for the residential accommodation sought.

Sustainability

The thrust of the NPPF is a presumption in favour of sustainable development. In our view the location of both sites (GT03 and GT04) are situated in an unsustainable rural location, distant to the services (such as health and education facilities) available in the wider hinterland. Rural locations such as these command a strong reliance on motor vehicles. The transient nature of the traveller lifestyle often involve slow moving vehicles that regularly pull trailers and caravans. Our client is aware that the slightly

staggered cross road junction at Hanbury Lane, Plough Lane and the B4455 is prone to road traffic incidents and on behalf of our client we therefore encourage your Council to examine the road traffic accident data that is available as part of your assessment process.

Summary and Conclusions

For the reasons set out in this correspondence we hold the firm view, on behalf of our client, that the rural area around Barnwell Farm is clearly not an appropriate location, given the current land use that exist, for the residential accommodation sought.

Of the twenty other option sites tabled there appears to be a number of other locations which appear to be far better placed in more appropriate and sustainable locations, without the environmental considerations as discussed above associated with either GT03 and GT04. For these reasons we encourage your Council to consider land around Barnwell Farm as a totally unsuitable and unsustainable location.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Jon Pope BSc (Hons) MSc MRTPI

Senior Planner

Gypsy and Traveller Site Options Response Form 2013

For Official Use Only
 Ref:
 Rep. Ref.

Please use this form if you wish to comment on the Gypsy and Traveller Site Options.

If you are commenting on multiple sites you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the consultation documents have been made available (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		MR
First Name	ON BEHALF OF:-	SON
Last Name		POPE
Job Title (where relevant)		SENIOR PLANNER
Organisation (where relevant)	EC DRUMMOND (AGRICULTURE) LTD.	ANTONY ASPBURY ASSOCIATES
Address Line 1		20 PARK LANE
Address Line 2		BUSINESS CENTRE
Address Line 3		BASFORD
Address Line 4		NOTTINGHAM
Postcode		NG6 0DN
Telephone number		0115 8528050
Email address		office@antonyasbury.co.uk
Would you like to be made aware of future consultations on Gypsy Traveller sites?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender	MALE	
Ethnic Origin	BRITISH.	
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input checked="" type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?	NOTIFIED BY CLIENT.	

Part B - Commenting on the Gypsy and Traveller Site Options

If you are commenting on multiple sites you will need to complete a separate sheet for each representation

Sheet of

The policy in the Draft Local Plan will list the criteria by which Gypsy and Traveller sites will be judged for suitability and sustainability. These are the criteria:

- Convenient access to a GP surgery, school and public transport;
- Avoiding areas with a high risk of flooding;
- Safe access to the road network and provision for parking, turning and servicing on site;
- Avoiding areas where there is the potential for noise and other disturbance;
- Provision of utilities (running water, toilet facilities, waste disposal, etc);
- Avoiding areas where there could be adverse impact on important features of the natural and historic environment; and,
- Sites which can be integrated into the landscape without harming the character of the area.
- Promotes peaceful and integrated co-existence between the site and the local community;
- Avoids placing undue pressure on local infrastructure and services;
- Reflects the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Please give your views about site suitability below with reference to this list of criteria.

Which site are you responding to?

(e.g. GT01 - Land adj. to the Cobalt Centre, Siskin Drive)

GT04 LAND AT HARBOUR LANE / FOSSE WAY

What is the nature of your representation?

Support

Object

Comment

Please set out full details of your objection or representation of support with reference to the criteria above.

PLEASE SEE ATTACHED LETTER

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Ref:

Rep. Ref.

Gypsy and Traveller Site Options Response Form 2013

For Official Use Only
 Ref: 9827-A
 Rep. Ref. 9826-R.

Please use this form if you wish to comment on the Gypsy and Traveller Site Options.

If you are commenting on multiple sites you will need to complete a separate copy of Part B of this form for each representation.

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Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		MR
First Name	ON BEHALF OF:-	SON
Last Name		POPE
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
Would you like to be made aware of this consultation?		
About You: Gender		
Ethnic Origin		
Age		
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?	NOTIFIED BY CLIENT.	

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GT03 LAND AT BARNWELL FARM,
HARBURY LANE

What is the nature of your representation? Support Object Comment

Please set out full details of your objection or representation of support with reference to the criteria above.

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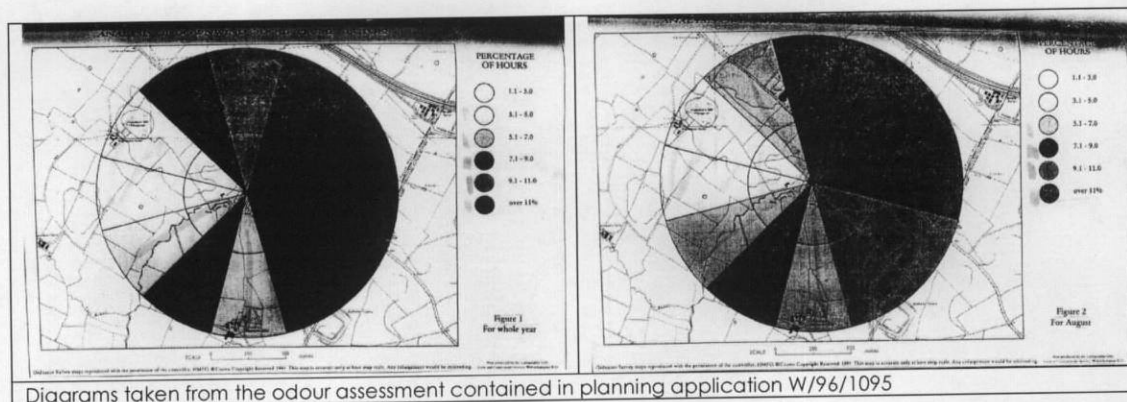
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