

For the attention of:

Development Policy Manager
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Warwick District Council
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Ref: Response to Warwick District Council – Local Plan – Preferred Options for Gypsy & Traveller Sites in Warwick District

Objection to: GT05 Land at Tachbrook Hill Farm, Banbury Road (Green Alternative Site)

I **strongly object** to the Proposed Alternative Site **GT05 Land at Tachbrook Hill Farm, Banbury Road**. In my opinion the Site is unsuitable & unsustainable as a Gypsy & Traveller Site for many reasons as discussed below.

The Proposed Gypsy & Traveller Sites are said to be judged by the Policy in the WDC Draft Local Plan based upon Suitability & Sustainability Criteria. I will base my objection comments on the Suitability & Sustainability Criteria which I believe this Site GT05 Land at Tachbrook Hill Farm, Banbury Road does not meet, therefore demonstrates that this Site is unsuitable and unsustainable for such a purpose as a Gypsy & Traveller Site. The Criteria are noted below in Red Bold Font.

– **Impact on Landscape Character** – This Site is Agricultural Land and is surrounded by fields. The Site is hilly, hence the name “Tachbrook Hill Farm”, and can be viewed from a high visual point when travelling along the Banbury Road A452 from the Warwick/Leamington/M40 Roundabout from Warwick & towards Gaydon. Locating a Gypsy & Traveller Site here would have a detrimental effect to the local landscape and would not be in keeping with the surroundings & would be an unpleasant vista entering the village.

– **Impact on designated areas of nature conservation, Flooding issues** – Despite the Consultation Documents advising that this Site Lies within Flood Zone 1 and therefore sequentially preferable. This Site has a tendency to become waterlogged at periods throughout the year. I have photographic evidence of the flooding in February 2014. Please see attached photos. Therefore, this Site would be unsuitable for Caravans and the Gypsy & Traveller Community.

– **Ability of Infrastructure requirements to be adequately met & Deliverability of Associated Infrastructure requirements** - It is unlikely that the site could be connected to the public foul mains sewer so would need a non-mains solution as per the WDC Consultation Documents. There is no existing infrastructure in place for such a purpose. Therefore, the Site is unsuitable compared to other Sites that already have such infrastructure in place.

– **Impact on heritage assets and the settings of heritage assets** - This Site poses a potential threat to Historical Bishop's Tachbrook which is listed in the Domesday Book along with possible damage to listed buildings around the village and local vicinity. This Site within Bishop's Tachbrook will harm the character of the area and the quality of life for those within the existing community.

– **Impact on ecology** – Any development would have an adverse effect on ecology & the natural environment. It is noted that the Site is not connected to the public foul mains sewer so would need a non-mains solution. If sewage removal is not dealt with effectively this will impact the environment. Furthermore, the Site is only 5 minute walk from Oakley Wood (via wide verge) and close proximity to the Guide Dogs Breeding Centre.

– **Impact of noise and other disturbance** – It is noted within the Consultation Documents that the Site area has been reduced to avoid noise from major Roads. However, I feel this will have little effect to the noise levels that could be potentially heard by Gypsy & Travellers occupying the Site. This Site is very close to the M40 and other major busy roads and with there being wide open countryside there is little to shield the noise and Caravans are not sound insulated. Therefore, this would be an unsuitable Site for the Gypsy & Traveller Community. In 1992 all Bishop's Tachbrook Residents were compensated for noise pollution due to the 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 levels.

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. Furthermore, if the site is to be used as a business use Site noise would be a problem for the Village Residents.

– **Agricultural Land Quality** – This Site is Agricultural Land Grade 3. The Farmer currently has lambs in the field. This Site is currently on good quality arable land which is in use as a means to provide food to the Population. Therefore, to remove the Farmer & his livestock to locate a Gypsy & Traveller Site here would be a waste of good quality agricultural land which we need to sustain. Furthermore, we need to support our local Farmers and the production of local produce. Especially with increasing levels of foreign imported foods which are often sold at a cheaper sales price than locally produced foods. Therefore, as a result Farmers are already experiencing increased pressures so we need to support the Farming Industry which is also beneficially to the economy as a whole.

– **Impact on visual amenity including the visibility and character of the site and surrounding area** – Locating a Gypsy & Traveller Site here would have an adverse impact on the visual amenity and character of the surrounding area & open countryside. There would be an adverse visual impact on entering Bishop's Tachbrook Village. A more tucked away Site that has the ability to be well screened and is not on high ground would be more appropriate. The Site is not in an area that can be integrated into the landscape without harming the character of the area which is stipulated as a Site Requirement within the Consultation Documents.

– **The potential for the site to be adequately screened** – Although the Site is partially screened and the breaks in the hedgerows on the Mallory Road could be dealt with by planting further hedgerows etc. However, the Site is on high ground, hence the name of the Site "Hill Farm" and can be viewed when travelling along the

Banbury Road A452 from the Warwick/Leamington/M40 Roundabout towards Gaydon.

– **Access to the road network** - Access from the Site GT05 is directly on to a busy road within 50 mph zones. There is a high traffic flow throughout the day with commuters to and from the M40, Banbury & Gaydon. To place a Site along this stretch of road poses a threat for all road users' safety. There is no safe access to the road network from these Sites which is a specified Site Requirement within the Consultation Document. This is dangerous for large caravans to be turning in and out of the sites and for all other road users. Furthermore, there are no pedestrian footpaths.

– **Safe access to and from the site for vehicles and pedestrians** – There are Road Safety Issues with this Site GT05. This is an accident blackspot and there have been many fatalities at that junction and near it. It is already difficult to exit the Village onto A452. This would be dangerous for slow-moving turning caravans exiting the Site onto Banbury Road. On the access from the Farmers drive there is a blind spot at the brow of the hill so this would be very dangerous for pulling out of and turning into. Alternatively, Mallory Road is a very narrow lane, therefore would prove difficult for turning long-wheel base caravans exiting the Site. Due to the remote locations of this Site and having no pedestrian footpaths secondary school children will have to wait for school buses on main roads or be transported to safe bus stops by car or all the way to school. This is not a sustainable solution.

– **Distance to GP surgeries, schools, dentists, hospitals, shops and community facilities** - The Croft Medical Centre which although is only open part-time, is useful for the elderly who form a large part of the Bishop's Tachbrook Village population, not having to travel into town to visit a doctor. Increasing numbers within the village will cause unavailability of appointments and longer waiting lists. Bishop's Tachbrook C of E Primary School & Nursery is currently oversubscribed. This places even more undue pressure on a small Village School and the additional support that will be required by Gypsy and Traveller children, children who are noted within Section 4 of the Consultation Document as being educationally disadvantaged; will be difficult for the school to provide without adversely impacting all pupils. It is understood that in these circumstances there is no additional funding provided by the County Council other than that received per capita of children receiving free school meals.

– **Proximity to other residential properties** – Proximity to Village is incompatible with the Gypsy & Traveller lifestyle desiring to live apart from the settled community. Too close a proximity to housing in Mallory Road & Holt Avenue, Bishops' Tachbrook.

– **Potential for the proposal to utilise previously developed land** – As noted above this is good quality arable agricultural land that is currently in use by the Farmer with his livestock of Sheep & Land. Therefore, this Site does not utilise previously developed land but to the contrary would use land which is fit for other purposes.

– **Suitable Size** – This Site is surrounded by fields and is a vast open space. Therefore, unsuitable for a Gypsy & Traveller Site as in my opinion a site of limited size but with the ability to extend the site to a maximum size of 10-15 Pitches is

sufficient. Although, I understand Warwick District Council has a legal obligation to provide the Gypsy & Traveller Community with Allocated Pitches. We must bear in mind & learn from the experience of Basildon District Council with their dealings with Dale Farm. Which was until October 2011, an illegal encampment of Travellers which had been established without planning permission from Basildon District Council. The site was owned by members of the travelling community and was located within the Green Belt. Dale Farm was a six acre plot of land on Oak Lane, near the A127 Southend Arterial road. Dale Farm has been subject to Green Belt controls since 1982. However, next to the Dale Farm site there was an authorised Travellers' site known as Oak Lane. This had Council planning permission, and provided 34 legal pitches. Locating a Site in such a vast wide area is a potential for further illegal encampments. Whilst WDC has a duty to provide the Gypsy & Traveller Community with Allocated Sites, WDC also has a duty to Local Residents to ensure that Sites do not expand to unmanageable illegal Sites. Sites not only need to consider the needs of the Gypsy & Traveller Community, but the Local Residents, Community and all other Tax Payers.

– **Deliverability & Availability of the site (including impact on the existing uses on the site)** – This Site is privately owned and the Landowner is unwilling to sell this land. Therefore, the Site would have to be obtained using Compulsory Purchase Powers. Compulsory purchase is unfair to take a Farmer's livelihood in order for the Gypsy & Traveller community to operate the site as a profitable business. This puts one Group's Human Rights above another which questionably goes against the Human Rights Act and can be considered as discrimination in itself.

Other Concerns:

- There is a concern that these sites within which the occupancies are potentially unregulated will place unfair burden on our already stretched local infrastructure.
- The availability of necessary employment for the Gypsy & Traveller Community within the Bishop's Tachbrook Village is also to be questioned.
- There is a concern that although the number of pitches upon the Sites is to be regulated, the occupancy on the pitches cannot be regulated or controlled.
- A further concern is that the Sites are likely to be operated & managed by the Gypsy & Travelling Community and not Warwick District Council. If the sites are managed in such a way who will regulate the occupancy within the Sites? There will be no way of controlling numbers. There is also a concern if sites are granted for a given number of pitches; the Gypsy & Travelling Community will breach Planning Policy as was the case with Dale Farm.

Support: GTalt01 Brookside Willows, Banbury Road (Green Preferred Site)

I **support** the Proposed Preferred Site **GTalt01 Brookside Willows, Banbury Road**. In my opinion the Site is suitable & sustainable as a Gypsy & Traveller Site for many reasons as discussed below.

The Proposed Gypsy & Traveller Sites are said to be judged by the Policy in the Draft Local Plan based upon Suitability & Sustainability Criteria. I will base my comments on the Suitability & Sustainability Criteria which I believe this Site GTalt01 Brookside Willows, Banbury Road meets, therefore demonstrates that this Site is suitable and sustainable for such a purpose as a Gypsy & Traveller Site. The Criteria are noted below in Red Bold Font.

– **Impact on the Green Belt** – Site GTalt01 Brookside Willows, Banbury Road is not in the Green Belt. Therefore, fulfils the suitability Criteria.

– **Impact on Landscape character** – The Site has already been approved Planning Permission for a Holiday Caravan Park & is already part-prepared, therefore the only difference to the Site would be the Caravans themselves. Therefore, this Site fulfils the suitability criteria and would be a viable Site.

– **Impact on designated areas of nature conservation Flooding issues** – It is noted within the WDC Consultation Documents that the Flooded watercourses drain to road rather than onsite. Therefore, fulfilling the required criteria and demonstrating suitability & sustainability.

– **Ability of Infrastructure requirements to be adequately met** – The required Infrastructure & Amenities are already part-prepared due to Planning Permission already being obtained for a Holiday Caravan Park. There is a large area for Caravans to turn into the entrance of the Site along with separate turning lanes on the Road. Minimum development needed for occupancy by the Gypsy & Traveller community.

– **Impact on Ecology** – Little effect on the local ecology as the infrastructure is already partially in place and Planning Permission already granted previously.

– **Impact of land contamination, noise and other disturbance** – It is noted within the WDC Consultation Document that Landfill details/potential risks known from previous work carried out for the original planning application. However, Planning conditions on existing permission deal with the issues of contamination from landfill. Therefore, the Site is proving to be both suitable and sustainable as an appropriate Gypsy & Traveller Site. With regards to noise, this Site is further away from the M40 than the GT05 Banbury Road Site, therefore noise levels will be lower for the Gypsy & Traveller Community. Also as the Site is screened with trees and not a wide open space this will prevent noise travelling from the Site to other Properties in the vicinity.

– **Impact on visual amenity including the visibility and character of the site and surrounding area** – This Site is set back from the Road and is located in a bend in the road from memory so is a more discreet Site than others that have been proposed. Therefore, this is well tucked away and not causing a detrimental visual impact to the existing surroundings. As noted the Site already has Planning Permission for a Holiday Caravan Site, therefore, using the Site for Gypsy & Travellers Site Allocation will have minimal difference to what the Site was originally meant for. In addition, Local Residents did not originally object to a Caravan Site

when the Planning Permission was approved by WDC. Therefore, this Site further meets the required Criteria.

– **The potential for the site to be adequately screened** – The Site was well-screened up until about 2 months ago when the Landowner has now removed some of the trees screening the Site. However, these can easily be replaced in order to minimise visual impact.

– **Access to the Road Network** – Good & safe access to road network. Pedestrian Foot paths from the Site to and from Warwick. By far the safest Site compared to that of GT05 Alternative Site. In addition, there is less traffic than other main roads locally.

– **Distance to GP Surgeries, Schools, Dentists, Hospitals, Shops And Community Facilities** – The Site is noted within the WDC Consultation Document to be close to edge of urban area. It is not far from Leamington, Warwick and Bishop's Tachbrook. Therefore, not all of the pressure needs to be placed upon Bishop's Tachbrook's limited village facilities. I believe there are also Public Transport links that pass this Site into Warwick.

– **Proximity to other residential properties** – There are only a few Residential Properties in this surrounding area and these are not in the local vicinity of the Site so there are no immediate neighbours.

– **Potential for the proposal to utilise previously developed land** – This is previously developed land and does not waste good quality arable agricultural land for such a purpose. Furthermore, this Site already has had Planning Permission approved previously by the Bishop's Tachbrook Parish Council for a Holiday Caravan Site. Therefore, this Site can be considered a suitable & fully sustainable option for a Gypsy & Traveller Site. This Site is the most viable of the Options put forward in the Bishop's Tachbrook Parish.

– **Safe access to and from the site for vehicles and pedestrians** – This Site is suitable as already has safe access to and from Site for both Vehicles and a pedestrian footpath into Warwick. It is noted within the WDC Consultation Documents that new access has been created with turning lane from Banbury Road to highway standards for the Holiday Caravan Park. Therefore, meeting the required criteria and yet again demonstrating the suitability of the Site for a Gypsy & Traveller Site.

– **Suitable Size** – The Site is well contained and has the ability to extend into 15 pitches from the originally proposed 10 if required. However, extension beyond the 15 pitches would be restricted due to the size of the Site which would prevent illegal encampment. Therefore, this would be a viable Site.

– **Availability of the site (including impact on the existing uses on the site)** – The Site already has Planning Permission for a Holiday Caravan Site – Could an agreement be met with the current Landowner? This is a more viable option than many of the other Sites requiring compulsory purchase powers.

– **Deliverability of the Site and associated Infrastructure requirements** – If the purchase of the land can be obtained. The associated infrastructure not already in place could easily be deliverable. Thereby, meeting the suitability, sustainability & deliverability criteria set by WDC.

Overall, **GTalt01 Brookside Willows, Banbury Road (Green Preferred Site)** not only meets the suitability, sustainability & deliverability criteria set by WDC, this Site would be the most ideal Site of all of the Proposed Sites within the Bishop's Tachbrook Parish.

