



Monday 28th April 2014

WARWICK DISTRICT COUNCIL LOCAL PLAN GYPSY & TRAVELLER PREFERRED OPTIONS

1. I wish to comment about the Gypsy & Traveller (GT) site proposals. I send this by e-mail as a low resolution pdf file but will also deliver it to your offices on a CD as I would like you to show those responsible for the final decisions on this matter my photographs in their original form if at all possible as I believe the landscape impact is important here.
2. First of all I would like to congratulate your team on managing to come up with a list at all. To say it must be a difficult task to find even one site that would receive universal approval must be an understatement. At the same time trying to develop a full new Local Plan under tremendous pressure from the Government and an army of objectors, I do not envy you your task.
3. With regard to the GT sites, needless to say I am not going to try to do your job for you and consider the whole District, I am going to concentrate my comments on my own, 'back yard', ie GT12. Inevitably then by definition I will look somewhat, 'NIMBY'. To try to overcome this criticism I will do my best to relate my comments to the the Statutory Guidance.
4. On page 4 of your preferred options document you have summarised the Guidance and this immediately raises a number of issues which suggests that the site may not be ideal, for example to enable access to:

Education
Health
Welfare
Employment

and having regard to:

Protection of local amenity
Protection of the environment

5. Other issues that immediately spring to mind include:

- Noise pollution
- Air pollution
- Highway safety / danger to pedestrians
- Visibility / lack of permanent screening
- Impact on Avon Valley landscape area
- Impact on heritage assets
- Impact on high quality agricultural land
- Impact on minerals

6. If I am right on even half of these points, it would seem that this must be one of the least suitable sites on the list.



7. Warwick District Council has worked tirelessly over recent decades to protect its essential cultural heritage against inappropriate development. Warwick has the enviable reputation of a well preserved County town with some of the finest historic buildings in the UK. Similarly its immediate environment includes a number of exceptional* villages in the heart of 'Shakespeare Country'. These of course include Sherbourne and Barford, lying on the primary route to important tourist destinations such as Charlecote, Stratford, Compton Verney and the Cotswolds.

8. You will be aware that Barford was recently singled out from the many hundreds of towns and villages across the whole of the Midlands (number 57 on the map) as one of the very best villages in the UK*. This has not occurred by accident, it is thanks to the hard work and careful planning by Warwick District Council planners and Barford residents over many years (both pre and post local government reorganisation) to maintain the highest levels of conservation and sensitive development.

9. In 2014 the people of Barford are continuing to work hard through industrious teams on the Parish Council and Neighbourhood Plan Group, to ensure Barford's essential heritage is not undermined by ill thought out decisions made in haste whilst under severe and unreasonable pressure.

10. To get to the point, I will try to summarise as briefly as possible why I feel this site is not appropriate for development as a Gypsy and Traveller site. I have indicated relevant paragraphs of the guidance in parenthesis [?].

ACCESS TO SERVICES

Sites should have access to education, health, welfare and employment infrastructure. [4, 11b,c,e]

11. This proposed site is quite significantly separated from the village by the busy A429. It will not have ready access to education as the school is always oversubscribed, and new housing development over the plan period (approximately 80 dwellings) will increase

demand even further. The school site is at the limit of its development and will never be able to accommodate one class per year.

12. There are no health facilities in the village, welfare facilities are minimal, and there is little employment infrastructure. That being the case, any facilities used by the occupiers of this site would not be in Barford and would have to be accessed via motor vehicle in nearby towns of Wellesbourne, Stratford, Warwick, Leamington or beyond.

THE ENVIRONMENT

The scale should not dominate nearest settled community. [12, 23]

13. It is a very long site maximising the negative influence it will have on the area. The Plan shows it to extend from Westham Lane almost to the river, about half the length of the bypass. This means the impact on a sensitive landscape and the small settled population will be totally disproportionate to the benefit gained.

Sites should be well planned to increase openness [24b]. Should not be enclosed with landscaping, high walls or fences [24d].

14. By designing the site in this way it means that the view from the properties in Westham Lane will be dominated by a long line of unsightly developments. Screening is by deciduous hedges only and as enclosure is not advised there will be nothing to minimise the visual impact across the whole site from the east.

15. From a landscape point of view this site is critical to Barford and Warwick District. The Avon meanders from Wasperton enclosing the historic Westham development and Barford in a beautiful loop of high quality agricultural land rich in wildlife and minerals.

16. As mentioned in 7 above this is a tourist route for the benefit of the whole area used by visitors worldwide, it is therefore very important that it is not be despoiled for the interests of a small minority. I hope you agree that the the photographs attached go some way in demonstrating this.

MINERALS

17. The site is defined as a *Minerals Safeguarding Area* and a *Sand & Gravel Resource Area*. The Government requires LPAs to adopt policies to ensure mineral resources are not needlessly sterilised by development.

AGRICULTURE

18. The Agricultural Land Classification system (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the system of sustainable development. It classifies land into five grades, with Grade 3 subdivided into 3a and 3b. The NPPF defines the, *Best & Most Versatile* agricultural land, as:

Land in Grades 1,2 and 3a of the Agricultural Land Classification

19. This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food such as biomass, fibres and pharmaceuticals. Current estimates suggest that approximately 60% of agricultural land falls out of the *Best & Most Versatile* class, ie it is 3b to 5.

20. The ALC map of the West Midlands Region identifies very little Grade 1 land and none in the Warwick District, the nearest being at Maxstoke near Coleshill in the north, and Evesham to the West. As a result there is a great dependency on Grade 2 and 3a land in Warwickshire.

21. **The whole of this site is Grade 2 land.** Government policy states where significant development of agricultural land is demonstrated to be necessary, poorer quality land should always be used in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper, *The Natural Choice: Securing the Value of Nature* (June 2011), including the protection of the best and most versatile agricultural land (para 2.35).



THE COMMUNITY

LPAs should respect the interests of the settled community [3 & 10] and protect local amenity. [4, 11a,e]

22. The residents of Westham Lane would be so severely impacted by this development it is difficult to imagine anyone choosing to buy property in this area again. There would also be a similar impact on residents in Barford, particularly properties to the west of the village, including the large development currently proposed on the nursery site.

23. As there is increasing competition for school places this could result in the feeling that the interests of the settled community was not being taken into consideration to the detriment of the aim of, “peaceful and integrated co-existence”.

HEALTH & SAFETY

LPAs must consider noise and air quality on the health & well-being of the travellers. [11e]

24. The A429 is a very heavily trafficked road and resulted in poor air quality and high levels of noise in Barford prior to the bypass being constructed. The impact of noise** in the area of the bypass will be greater now due to increased vehicle speed and volume, particularly HGVs. In addition, caravans have very poor sound insulation characteristics so internal noise levels would be much greater than in any houses built on the site.

25. Air quality will also be compromised for the same reasons.

26. It is completely inappropriate to infer that the children of traveller families can be exposed to higher levels of pollutants without consequence.

27. The road is flowing constantly and crossing it is always fraught with danger. To reduce this danger it would be necessary to install lights and a permanent crossing. Obviously professional advice would be required on this but in my lay opinion the negative impact on fast and heavy traffic flow would be disproportionate to the benefit gained for 8 families.

IMPACT OF A LIVE WORK SITE

Sites will be considered more sustainable if they reflect the traditional lifestyle of travellers and allow work from the site. [11h, 16]

28. I would suggest that it is almost essential for traveller families to be able to carry on their business from the chosen sites. Experience shows that this invariably involves sprawl and it is not uncommon for working sites to become untidy as working materials and temporary buildings spread far and wide resulting in a much greater visual impact than merely 8 caravans.

29. I do not think it is unreasonable to suggest that this site would not be suitable as a live / work site. I can provide photographs of live / work sites as examples if necessary.

BROWNFIELD SITES

LPAs should attach weight to brownfield, untidy or derelict land. [24a]

30. There are many brownfield sites which would benefit from this type of development and I feel greater weight should be given to previously used land over high quality agricultural land with high levels of biodiversity and landscape value.

THE NPPF

31. There is no doubt in my mind that this site does not comply with many aspects of the NPPF and therefore cannot be considered sustainable in planning terms. I appreciate, however, that how much the guidance in the NPPF is taken into consideration is not clear to policy makers. We are told:

LPAs preparing plans should also have regard to the policies in the NPPF, "so far as relevant".

32. Also, In relation to Neighbourhood Plans:

The independent examiner will consider whether having regard to national policy is appropriate.

33. I doubt anyone would consider this wording anything other than very unsatisfactory, potentially leaving the fate of communities entirely at the discretion of one individual. If it is considered appropriate to completely ignore all aspects of the NPPF in order to approve completely unsustainable development to the clear detriment of a larger settled community for the benefit of a small minority group, it maybe that it could realistically be challenged as a human rights issue.

34. I would urge your Local Authority to seek to strike a reasoned balance here taking the principles of sustainability from the NPPF into consideration.

35. To summarise, the proposal does not meet the following criteria in your preferred options document relating to:

1. Convenient access to GPs surgery, school and public transport
3. Safe access to the road network
4. Avoiding areas where there is noise
5. Provision of utilities
6. Avoiding areas where there could be adverse impact on important features of the natural and historic environment
7. Integrating into the landscape without harming the character of the area
8. Promoting peaceful and integrated coexistence between the site and the local community
9. Avoiding placing undue pressure on local services
10. Reflecting traditional lifestyle

36. In addition the site:

- a) Will be affected by poor air quality
- b) Is a minerals safeguarding area and sand and gravel resource area)
- c) Is high quality Grade 2 agricultural land (the best in the County)

37. I would therefore respectfully suggest that the evidence clearly indicates that this site should be removed from the list of preferred options.

38. Again many thanks for all your efforts, I know it's not easy.

Kind regards



Roger Braithwaite

Attached: 10 photographs of surrounding landscape

Note - I have not made any attempt to comment on other sites in the consultation document as I feel that it would make my submission too long. I would, however, be pleased to support the Council, especially in relation to planning and pollution issues, if you feel my assistance would be of value.

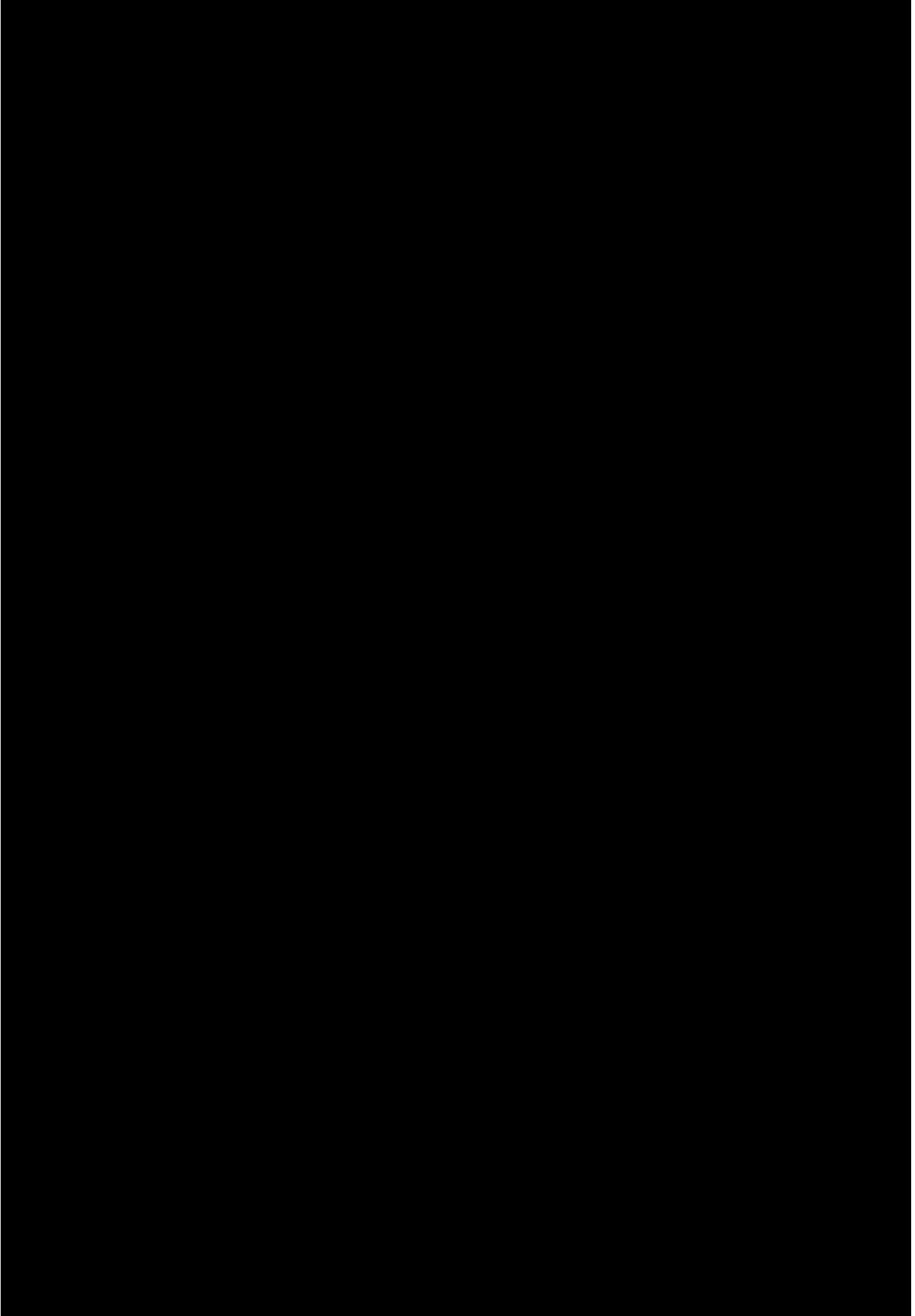
* see link below

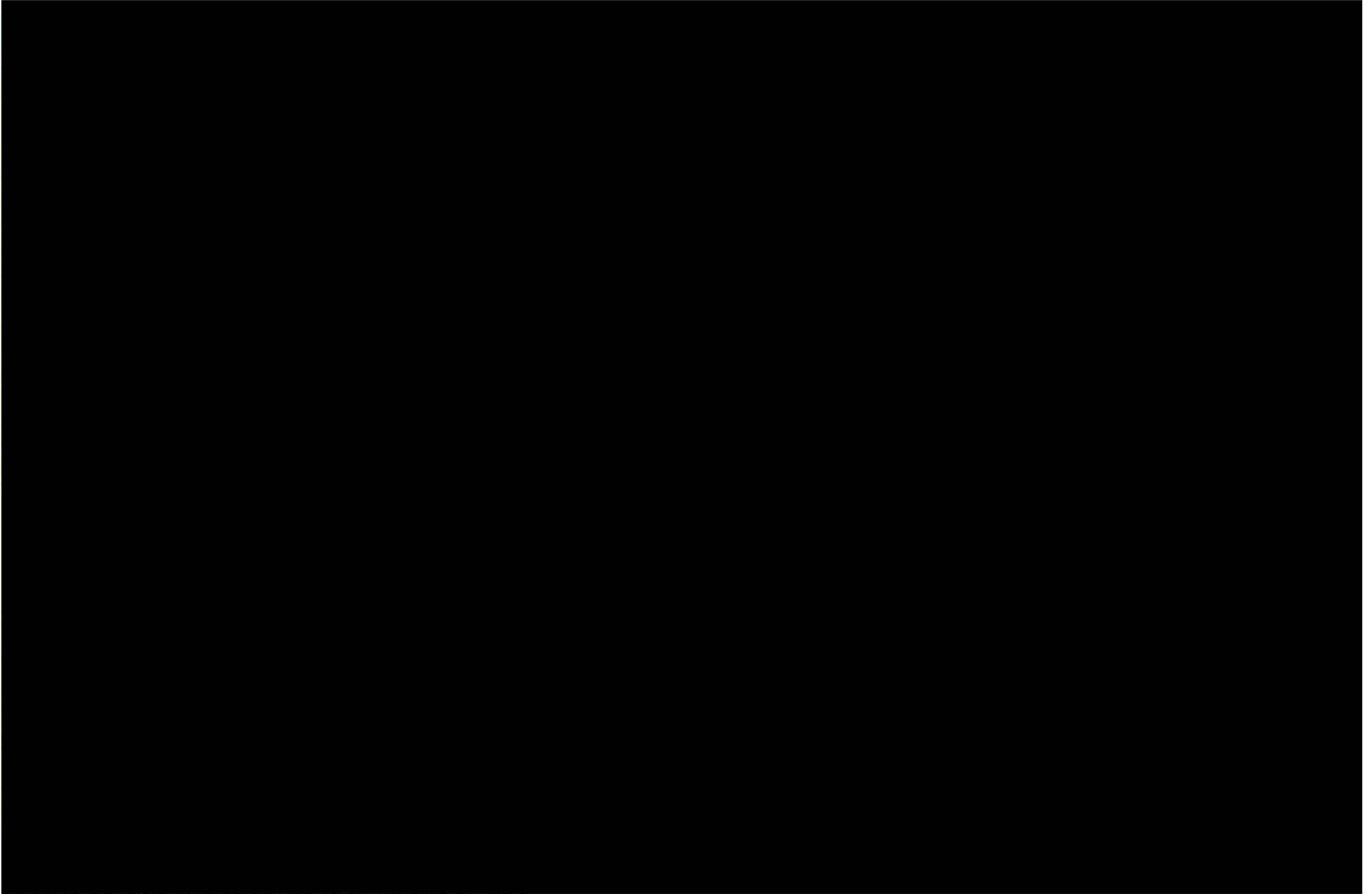
<http://www.stratford-herald.com/349-barford-in-top-10-places-to-live-in-the-midlands.html>

** I specialise in noise and environmental acoustics and if it is the case that noise is NOT considered an issue on this site I would request a details of the data and criteria used to come to this decision.

PHOTOGRAPHS

Views of Barford and landscape to the east (including fine listed stone bridge) on entering the A429 bypass.





views to the west towards Sherbourne





Views towards the site from the bypass



Westham House is a collection of historical timber framed buildings in private and commercial use currently with pastoral views over a beautiful riverside landscape. The farmland forms some of the best agricultural land in the County. The development would have a seriously detrimental impact on this landscape.

