

BISHOP'S TACHBROOK PARISH COUNCIL

Clerk to the Council: Mrs Corinne Hill

Gaydon Fields Farm, Gaydon CV35 0HF

Tel: 01926 641220 email: parishclerk@bishopstachbrook.com

9th May, 2014

To. Ms. Lorna Coldicott, Mr. D. Barber, Ms. T. Darke, Cllr., A. Mobbs
Warwick District Council.
Sent via email.

To whom it may concern

Bishop's Tachbrook Parish Council Response to Gypsy and Traveller Site Consultation 'Preferred Options'

Bishop's Tachbrook Parish Council (BTPC) has considered the proposal as set out in the consultation documents and in the proposals put before the Executive on 12 February 2014, agenda item 10 and responds as follows:

1. We wish to **OBJECT** to site **GT15** (Land East of Europa Way) and seek its removal from further consideration as a potential traveller site by Warwick District Council.
2. We wish to **COMMENT** on 'preferred site' **GTalt01** (Brookside Willows).

Whilst responding to this consultation we would also like to request that Warwick District Council **REMOVE** 'alternative' sites **GT05** (Hill Farm) and **GT06** (Park Farm/ Spinney Farm) from further consideration and our reasons for our responses are summarised below.

Our conclusions have been informed by extensive community engagement and through the commissioning of a range of independent technical reports. A full account of this is contained in the comprehensive report produced jointly by Link Support Services (UK) Ltd and Tufnell Town and Country Planning. They have provided advice and recommendations to us which we accept and have helped to inform our conclusions (along with local consultation).

Other technical reports which have informed our response are also being submitted on our behalf by our agent Link Support Services UK Ltd. These include two ecology reports relating to sites GT15 and GT05 and a transport report relating to site GT05.

Background

Planning experts in this sector of development and in other related specialist areas have been employed to ensure BTPC is able to provide an expert, planning-led response to the proposals. These companies are:

- (a) Link UK Support Services Ltd
- (b) Tufnell Town and Country Planning
- (c) Swift Ecology LTD
- (d) Systra Ltd

Link UK Ltd has been authorised to make representations on behalf of BTPC to the District Council, throughout this phase of the consultation (as agent).

This letter is supported by a detailed report (Link UK Ltd reference DM6041) which has been co-authored by Link UK Ltd and TT&CP with further evidence provided by Swift Ecology and Systra. Evidence is also provided following two engagement events held with the residents of the Parish.

BTPC has taken the opportunity in this consultation on the “preferred options” to look at the suitability and viability of the “alternative option” sites identified.

But for both categories BTPC has limited its evaluation to those sites located within the parish boundary.

Detailed Comments

Proposed Operating Model

As a general comment BTPC does not support the District Council’s proposed operating model, ownership and operation by a private landlord. It strongly believes that the gypsy and traveller sites within Warwick District must be owned and operated by either the District Council or a specialist Housing Association. We believe that either of these bodies will provide much more effective long term management and remove risk associated with ineffectual governance or public accountability. In the case of District Council management, it will be able to take direct and immediate action against any planning or environmental breaches or other concerns.

Compulsory Purchase

Also BTPC strongly opposes the use of compulsory purchase even 'as a last resort' in acquiring sites. It is considered draconian that one private landlord is forced to sell land to another private landlord, so that the site can be used for a commercial purpose. Compulsory purchase is inappropriate in these circumstances and should be reserved for only major infrastructure projects. It is also inappropriate for landowners to feel the threat of this action during a 'consultation' process.

Comments on 'Preferred Option' Site GTalt01

On this preferred option BTPC makes the following comments. We believe that this site has significant potential to be taken forward as a possible Gypsy and Traveller Site. The principle reasons for coming to this opinion are as follows.

- The site already has planning permission for use as a touring caravan site which has many similarities to use as a gypsy and traveller site
- It is close to a range of local amenities and services
- Existing highways infrastructure providing safe access and egress for large vehicles is already in place.

But we also have a range of concerns and further information and assessments would be required to firmly establish suitability. For example:

- Whether or not the site is actually 'available' and therefore deliverable (see our comments above on the use of compulsory purchase)
- There is a lack of suitable access to local amenities by 'non car modes' undermining the sustainability of the site.
- Removing concerns about the possible impact on the historic Castle Park setting.

- Addressing flood risk.
- Concerns over contamination, potential site expansion and ensuring the protection of important ecology.
- Structure of governance to oversee development and thereafter manage the site
- The analysis of this site and the areas of concern that remain are dealt with in full in the supporting Link UK report.

Comments on 'Preferred Option' Site GT15

BTPC **OBJECTS** to this preferred option, because from the evidence available from WDC and from the assessments made by BTPC's team of experts there are too many major negative factors which are already apparent at this stage which would have to be overcome. Some of the major negative factors are listed as follows:

- The site is located on a very busy major road and costly infrastructure would need to be provided to allow large articulated vehicles to access and exit the site safely.
- Negative impact on ecology, water quality and concerns relating to air quality effects and noise pollution impact on occupants.
- Remote from basic services and amenities and no access to the site by 'non car modes', leading to sustainability concerns.
- The site does not have easy access to utility connections and it has been stated by WDC that both HV and LV power network changes would be needed to make the site deliverable which may make the site financially unviable.
- The site is small and sloping and it may not be possible to construct the on-site access roads and hard-standings required for a gypsy and traveller site.
- Site infrastructure would require extensive clearance of flora and fauna. This will have an ecological impact.
- The removal of this would create visual impact through views created into the site from a historic footpath on the south side of the Tachbrook Valley and from the proposed country part on the northern side of the Tachbrook Valley.
- The potential for flooding has not been assessed.

Comments on Alternative Site GT05

Based on the evidence provided by WDC and from the further evidence provided by BTPC's team of experts, BTPC believes that this site has significant negative factors affecting its suitability as a gypsy and traveller site. A high level summary of these are as follows below:

- This section of the Banbury Road and its junction with Mallory Road are known accident black spots including a history of fatalities. Our experts' report shows that a gypsy and traveller site here would lead to regular movements/ manoeuvres of large articulated vehicles. This would worsen road safety and lead to an even greater incidence of accidents.
- Access from Mallory Road has been deemed unsuitable (County Council assessment) and access onto the Banbury Road cannot provide adequate sight lines.
- In addition, constructing infrastructure to provide access onto Banbury Road will require the removal of a number of mature oak trees and impact on some of the most ecologically valuable features of the land.
- The site is highly visible from a long stretch of the Banbury road in both directions and also from Mallory Road. This is supported by the WCC Landscape Sensitivity, Ecology & Geological Report for the New Local Plan. This assessed the landscape sensitivity to housing development as High.

- Development will impact negatively on this important rural buffer zone and undermine the visual amenity, quality and character of the land
- The owner is not willing to sell and BTPC is against compulsory purchase of this site for the reasons stated above.
- Adverse impact on an agricultural business and
- Adverse effect on the amenity of the owner and other residents

For these reasons and based on the site analysis and detailed evidence in our expert's report we conclude that this site should not be considered further as a potential site for Gypsy and Traveller housing and request that it is removed from the District Council's list of "alternative" sites.

Comments on Alternative Site GT06

Our experts, having assessed this site using any evidence provided by WDC and also in undertaking their own assessment of this site have concluded that there are a number of major negative factors affecting the viability of this site. Such as

- The site is unavailable and therefore it is uncertain that it can be delivered. It could only be purchased through compulsory purchase.
- Existing site access (which we believe is in separate ownership) is not available and the need to create a new access would give rise to Highway Safety concerns
- Visual and ecological impact would also be made worse by the creation of a new access.
- Any potential development will adversely affect a viable agricultural business
- There are also concerns about the potential impact on the setting of the historic Castle Park
- This site is very remote from key amenities and services meaning they can only be accessed by car, or by bus but only after a ½ mile walk along a major road with no footpath.
- Development will adversely affect the visual amenity, quality and character of the land. Adverse effect on the amenity of the residents at the farm

For these reasons and other factors set out in the detail of the supporting report, this site clearly has a number of substantial factors that we feel cannot be overcome and we conclude therefore this site should also be removed from the list of potential alternative sites.

Yours sincerely,

On behalf of Bishop's Tachbrook Parish Council