



ENGLISH HERITAGE
WEST MIDLANDS

Dave Barber,
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CV32 5QH

Our ref: WM 5399 RJT
Your ref: -

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Telephone
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1 May 2014

Dear Mr Barber,

Warwick District Council Local Plan – Preferred Options for Gypsy and Traveller Sites

Thank you for providing an opportunity to comment on the emerging Plan. This letter will focus on the proposal off Banbury Road adjacent to Warwick Castle Park.

My consideration and response is based on the expectation there has been a proper assessment of the significance of heritage assets affected, including their settings¹; and the proposals support the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF), with one of the core dimensions being the protection and enhancement of the historic environment².

Site GTalt01 Brookside Willows, Banbury Road (4.7 ha 10 pitches)

The Brookside Willows site is situated close to Warwick Castle Park which is included on the English Heritage Register of Historic Parks and Gardens at grade I. The Park is also a component of the Warwick Conservation Area.

The setting of the Park to the east is a rural one. The Park's perimeter drive and associated planting (the Long Thins) provides some screening from the Banbury Road, but at the same time the planting was deliberately left thin enough to allow the surrounding countryside to be appreciated and embodied as a part of its setting.

Where the drive crossed the lake known as New Waters it ran close to the road with direct views across it to an extension of New Waters, now the site of Brookside Willows. There is little doubt that it was intended to be/was an extension of the lake, and despite the subsequent land tipping and pollution is still recognisable as such. This supports the argument that Brookside Willows forms part of the setting of the park and contributes to its significance.

However the degree of harm to the significance of the affected heritage assets from the Gypsy and Traveller site proposal has yet to be clearly determined.

¹NPPF paragraphs 157, 158, 169, 170, 182

² NPPF paragraph 7

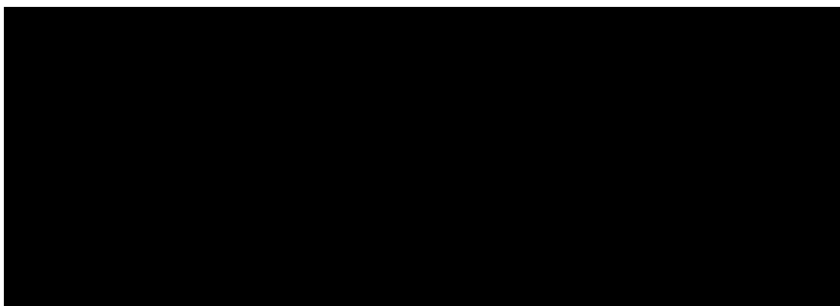
I note your policy commitment (PO3 Criteria for assessing sites) to consider proposals to develop land for use as Gypsy and Traveller Sites against the impact on heritage assets and their setting. Unfortunately there does not appear to be evidence that such a thorough, objective and appropriate assessment has been undertaken in relation to The Brookside Willows site, mindful of the national significance of the Grade 1 Castle Park and Conservation Area.

As the relative impact on the significance of the affected heritage assets has not been established, the case has not been made for the allocation in accordance with the provisions of the NPPF.

English Heritage is concerned about the suitability of the site and the potential harm to the significance of the Grade I Registered Park and Conservation Area. The national significance of the Park needs to be conserved and we would strongly encourage consideration of the numerous other potential sites as an alternative.

Without prejudice to the above matter of principle, where adverse impacts are unavoidable and justified, in accordance with the NPPF, the Plan should consider how that harm might be reduced and any residual harm mitigated³. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

Yours sincerely,



³ NPPF, Paragraph 152

