

Site Assessments and the Green Belt

Gypsy and Traveller Site Allocations DPD
Publication consultation draft



Nuneaton and Bedworth Borough Council

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1.0 Introduction

- 1.1 The purpose of this document is to support the delivery of the Gypsy and Traveller Site Allocations Development Plan Document (DPD). This DPD is required by the adopted Borough Plan to provide additional pitches for gypsies and other travellers.
- 1.2 The current Local Development Scheme (2020) sets out the timetable for the production of Gypsy and Traveller Site Allocations DPD which is as follows:
- May 2021 – consultation on an Issues and Options document;
 - January 2022 – consultation on a publication document;
 - July 2022 – submission of the document to the Secretary of State;
 - January 2023 – receipt of Inspector’s report on the examination of the document; and
 - February 2023 – adoption of the document.
- 1.3 The issues and options document was consulted upon in June to August 2021 and this document supports the publication version of the document. The publication document identifies land where additional pitches could be provided. The purpose of this document is to set out the rationale for selecting sites for allocation and explaining how the allocation fits in with the purposes of the Green Belt.

2.0 Site Assessments

Sites put forward for consideration

- 2.1 The evidence that supported the adopted Borough Plan and the need for additional gypsy and traveller pitches was a Gypsy and Traveller and Travelling Showperson Accommodation Assessment dated from 2016. The assessment concluded that the evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate. Therefore, the Council commissioned another accommodation assessment to assess the need in 2021. This newer assessment then formed the basis for the need for additional pitches in the publication version of the Gypsy and Traveller Site Allocations DPD.
- 2.2 As part of the assessment of need, through the household surveys, it was also ascertained if any existing sites could accommodate additional pitches. This was an initial stage purely to set out if any had the potential to provide such accommodation not whether they were acceptable to do so. The assessment proposed that there were three sites in the borough that could contribute to any need and in very broad terms how that could be achieved and these are as follows:
- Private Site at Fella's Acre, Mile Tree Lane, Bulkington – 2 additional pitches through site expansion;
 - Private site at Winter Oak, Watling Street, Nuneaton – 6 additional pitches through site intensification; and
 - Private site at Sunrise Cottage, Mile Tree Lane, Bulkington – 3 to 5 additional pitches through site intensification.
- 2.3 The 2021 accommodation assessment was consulted upon alongside the issues and options version of the Gypsy and Traveller Site Allocations DPD between 11th June and 6th August 2021. No additional sites were put forward to consider as part of this consultation. To ascertain if there were any other sites to be considered the Council undertook a call for sites between 17th September and 22nd October 2021. No sites were put forward for consideration that would provide pitches for travellers.
- 2.4 The three sites proposed in the 2021 accommodation assessment were independently assessed outside of the needs assessment for their potential to provide the pitch numbers. This assessment concluded that of the three sites set out above only two of them had the potential to provide new pitches, those at Winter Oak and Sunrise Cottage. The owner of Fella's Acre had no desire to expand the site. However, the owner did have another parcel of land at The Old Nursery that he wished to be considered. This was duly considered as part of the independent assessment and would be a new gypsy and traveller site which could provide up to 6 pitches. This

assessment also reported that the owner at Sunrise Cottage felt comfortable providing for a further 3 pitches (and thus not the 3-5 as previously accounted for in the accommodation assessment). The independent assessment can be viewed alongside this document as part of the consultation on the DPD.

- 2.5 Following this independent assessment the Council consulted a range of stakeholders on the three remaining sites to help undertake a more detailed assessment of the sites and also to identify the key development principles that may be required should a planning application be made. Appendix 1 of this document tabulates the organisations consulted and the responses received. These responses were used by the Council to complete assessment tables for each of the three sites; the full assessment tables are in a separate Excel spreadsheet which can also be viewed alongside this document as part of the consultation on the DPD. However, the table within Appendix 2 of this document has been based on the results presented in the Excel spreadsheet assessment. The outcome of the assessments is that of the three sites, none of them have any planning constraints that would prohibit them from being allocated (notwithstanding the issue of the Green Belt which is dealt with in the next chapter).
- 2.6 The Gypsy and Traveller Site Allocations Development Plan Document (DPD), in which sites are allocated, sets out a spatial strategy for the locating of new gypsy and traveller pitches which, if adopted, would be the starting point for assessing the suitability of a location for additional pitches. If suitable pitches cannot be found using the three locational preferences for sites of the strategy, then, the extant policy from the Borough Plan, Policy H3 – Gypsies and Travellers, would be used. This policy has a certain element of spatial strategy (bullet point 8) but is principally one that assesses the physical characteristics of a new development and its interactions with other land uses. However, even with adoption of the gypsy and traveller site allocations DPD Policy H3 will remain extant and further application for new pitches will need to accord with this policy and the policies in the allocations DPD. Therefore, it is appropriate to assess the three sites for allocation against this policy – to ensure that they accord with it. Policy H3 is repeated below.

Policy H3 – Gypsies and Travellers

The following criteria will be used to identify suitable strategic sites for at least 39 residential and 5 transit pitches to be taken forward in a Gypsy and Travellers Site Allocations document for the period 2016/2017 to 2031/2032:

- 1. The number of pitches or plots is relative to the size and scale of the site.*
 - 2. The number of pitches or plots is relative to the size and density of the surrounding settled community.*
 - 3. The site is not located in areas of high flood risk.*
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4. *The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets.*
5. *The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected.*
6. *The site has suitable access to the highway network.*
7. *The site is located where air or noise pollution will not affect the health and well-being of site residents, and neighbouring uses will not be affected by air or noise pollution as a result of the Gypsy and Traveller development.*
8. *The site is accessible to town and district centres, local services and facilities such as schools and health facilities, fresh food and employment, by walking, cycling and public transport, in line with 'Policy TC3 - Hierarchy of centres', or it can be demonstrated that the site is sustainable in other ways.*
9. *The site has suitable connection to the foul sewage system, or can demonstrate that connection is unviable and alternative arrangements can be made, in consultation with Severn Trent.*

The above criteria will also be used in determining any future planning applications for Gypsy and Traveller sites.

- 2.7 Table 1 below shows the assessment of each of the three sites against the nine bullet points of Policy H3. Generally, the three sites do well against the criteria set out in the policy. The obvious exception is Sunrise Cottage and The Old Nursery against the first part of the eighth bullet point and accessibility to services by walking, cycling, and public transport. However, there are other sustainable matters that make these sites acceptable. Also, it must be considered that accessibility, in the case of gypsy and traveller sites, has to be balanced against the desires of that community and the need to provide sufficient pitches. Traveller communities tend to favour locations slightly away from the traditional built-up areas and land in close proximity to the large urban areas is at a premium for large-scale residential estates developments and thus is not readily available for these other uses.

Table 1 – Assessment of three allocated sites against the criteria of Policy H3 – Gypsies and Travellers of the adopted Borough Plan.

Criteria of Policy H3	Site		
	Sunrise Cottage	The Old Nursery	Winter Oak
1. The number of pitches or plots is relative to the size and scale of the site.	Independent assessment of the site indicates that the site can take additional pitches.	Independent assessment of the site indicates that the site can take new pitches.	Independent assessment of the site indicates that the site can take additional pitches.
2. The number of pitches or plots is relative to the size and density of the surrounding settled community.	Additional pitches proposed would not be detrimental to the surrounding community.	New pitches proposed would not be detrimental to the surrounding community.	Additional pitches proposed would not be detrimental to the surrounding community.
3. The site is not located in areas of high flood risk.	Site is in flood risk zone 1.	Site is in flood risk zone 1.	Site is in flood risk zone 1.
4. The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets.	Site is not near to any of these designations or assets. A brownfield site so also unlikely to affect undesignated assets.	The Grade II listed Tolldish Hall and Tolldish Hall Cottage is some 70 metres to the north of the nearest point of the site. Other than this no other designated land is present. A brownfield site so also unlikely to affect undesignated assets.	Site is not near to any of these designations or assets. A brownfield site so also unlikely to affect undesignated assets.
5. The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected.	Site is in an appropriate location where neighbouring land uses should be protected. Site is not within a coalfield Development High Risk Area.	Site is in an appropriate location where neighbouring land uses should be protected. Site is not within a coalfield Development High Risk Area.	Site is in an appropriate location where neighbouring land uses should be protected. Site is not within a coalfield Development High Risk Area.
6. The site has suitable access to the highway network.	Existing access to the site is suitable for continued access with increased use. Very minor works needed to make	Existing accesses to the site need some works to make acceptable this new proposed use acceptable (not insurmountable).	Existing access to the site is suitable for continued access with increased use.

Criteria of Policy H3	Site		
	Sunrise Cottage	The Old Nursery	Winter Oak
	continued use of the access acceptable.		
7. The site is located where air or noise pollution will not affect the health and well-being of site residents, and neighbouring uses will not be affected by air or noise pollution as a result of the Gypsy and Traveller development.	No issues regarding air and/or noise.	No issues regarding air and/or noise.	No issues about air and/or noise.
8. The site is accessible to town and district centres, local services and facilities such as schools and health facilities, fresh food and employment, by walking, cycling and public transport, in line with 'Policy TC3 - Hierarchy of centres', or it can be demonstrated that the site is sustainable in other ways.	Site is not accessible by walking, cycling, or public transport to appropriate services. However, the intensification of an existing gypsy and traveller site, making use of existing infrastructure, and making use of brownfield land is sustainable in other ways. Also, by providing sufficient pitches within the borough for the needs of the borough this is more sustainable than seeking adjoining authorities to make this provision.	Site is not accessible by walking, cycling, or public transport to appropriate services – there is a public right of way adjacent to the site that would allow for access to Exhall and Hawksbury but this is over unmade ground and would be less than ideal. However, the creation of a new gypsy and traveller site within the curtilage of a residential dwelling would make use of existing infrastructure and brownfield land and, thus, be sustainable in other ways. Also, by providing sufficient pitches within the borough for the needs of the borough this is more sustainable than seeking adjoining authorities to make this provision.	Site is adjacent to cycle path/footpath and within easy walking distance of bus stop allowing for reasonable access to appropriate services.

Criteria of Policy H3	Site		
	Sunrise Cottage	The Old Nursery	Winter Oak
9. The site has suitable connection to the foul sewage system, or can demonstrate that connection is unviable and alternative arrangements can be made, in consultation with Severn Trent.	Given distance to nearest main sewer, connection unlikely to be viable.	There is an aerated sewage system to the rear that could be connected to.	Connection to main sewer may be possible but cost may be prohibitive for such a development.

3.0 Green Belt

Introduction

- 3.1 Nuneaton and Bedworth Borough sits within the wider West Midlands Green Belt which was established in 1975 and covers almost 1500 square miles. The Borough contains large amounts of Green Belt land, most of which is located to the south of Nuneaton, but also surrounds the main areas of Bedworth, Bulkington, and Ash Green. Green Belt makes up 41% of the Borough's land.
- 3.2 The Government attaches great importance to the Green Belt, which serves the main goal of preventing urban sprawl and keeping land permanently open. The five key purposes of Green Belts are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.3 Of the three sites that could provide additional pitches two are within the Green Belt, the Winter Oak site although within the countryside is not in the Green Belt and, thus, will not be considered further in this chapter.
- 3.4 The Joint Green Belt Study (2015) that was used to support the adopted Borough Plan split up the Green Belt land within the administrative areas of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council into distinct parcels for the purposes of assessment. Both the identified potential gypsy sites within the Green Belt are within the parcel identified as BE3. The parcel scores 14 out of 20 against the five purposes of the Green belt, the score reflecting that this parcel of the Green Belt does not contribute at all to preserving the setting and special character of historic towns. In terms of openness the parcel scores 1 out of 2 reflecting the impact the buildings associated with isolated dwellings compromise the openness of the Green Belt within their immediate vicinity. These buildings are scattered reasonably evenly throughout the parcel. However, large portions of the parcel are undeveloped and open agricultural fields.
- 3.5 Also to support the Borough Plan was the Nuneaton and Bedworth Landscape Character Study (2011) which split the areas outside of the main urban areas into distinct areas. Sunrise Cottage falls within the Bulkington Village Farmlands landscape character (LCA5) which has been assessed as having both landscape strength and landscape condition as moderate. The area is sensitive to any changes which may reduce separation between Bulkington, Bedworth, and Coventry.
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- 3.6 The Old Nursery is within the Nuneaton and Bedworth Urban Fringe (LCA6) character area which has been assessed as having moderate landscape strength and poor landscape condition. The land provides separation between Bulkington, Bedworth, and Coventry which is reinforced by views across farmland, although in places development is intervisible. Ribbon development along Bedworth Road and Coventry Road reduces separation between settlements when travelling along these roads. The landscape is sensitive to any development which would reduce the sense of separation between settlements, further ribbon development or diversification of farmsteads which urbanises the landscape should be avoided to prevent the perception of joining the settlements along Bedworth Road and Coventry Road.
- 3.7 Sunrise Cottage and The Old Nursery have been assessed against the five key purposes of the Green Belt set out above and these are presented in Table 2 below. It is considered that Table 2 shows that the two sites in the Green Belt would meet the first three key purposes of the Green Belt.

Table 2 – Assessment of sites in Green Belt

Key Purposes of the Green Belt	Site	
	Sunrise Cottage	The Old Nursery
To check the unrestricted sprawl of large built-up areas.	The intensification of the use of this existing, lawful development would not lead to unrestricted sprawl and its location within one of the existing clusters of development in this parcel of the Green Belt and would not affect openness.	The change of use of land within the curtilage of this detached house which is set in quite substantial grounds would not lead to unrestricted sprawl. The intensification of the use of the site would affect the openness of the Green Belt in its immediate vicinity but this would be in the context of being within an agglomeration of buildings that already forms one of the clusters distributed throughout the parcel. The effect on the openness of this parcel or the Green Belt and in its immediate vicinity is limited and less than substantial.
To prevent neighbouring towns merging into one another.	The site is located to the east of Bedworth and south east of Nuneaton and does not lie between	The site is located to the south east of Bedworth and south south east of Nuneaton and does not lie between the two

	the two towns and has no effect on towns merging.	towns and has no effect on towns merging.
To assist in safeguarding the countryside from encroachment.	This is an existing site in the countryside that would need no physical expansion into the surrounding countryside to accommodate new pitches and, therefore, there is no additional encroachment and it would not have the effect of urbanising the countryside.	This is a residential development already present in the countryside, an intensification of the residential use of the site would not lead to an encroachment into the countryside. The intensity of a new use could have the effect of urbanising the countryside in the immediate vicinity of the property. However, this is set within the context of existing urbanising developments to the north and east.
To preserve the setting and special character of historic towns.	The site is located to the east of Bedworth and south east of Nuneaton and does not lie between the two towns. The intensification of the site would not affect the setting of either Bedworth or Nuneaton but nor would it preserve their character.	The site is located to the south east of Bedworth and south south east of Nuneaton and does not lie between the two towns. The intensification of the residential use of the site would not affect the setting of either Bedworth or Nuneaton but nor would it preserve their character.
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	This site would not encourage reuse of urban land but is a brownfield site.	This site would not encourage reuse of urban land but is a brownfield site.

- 3.8 Regarding the fourth bullet point the Joint Green Belt Study (2015) identified that the parcel of land in which the two sites sit does not contribute at all to preserving the setting and special character of historic towns. However, this is not because the land is failing to achieve this, it simply does not have that function through its location and relationship to historic towns. Hence, why these sites will not affect any settings.
- 3.9 As to the final key purpose of the Green Belt, the sites do not directly assist to regeneration in urban areas but neither do they prohibit or hinder such regeneration; no sites have been put forward to the Council for new pitches in urban areas and thus, these two sites have not been selected in advance of such sites. Indeed, both sites are previously developed land (i.e., brownfield land). The Old Nursery, although not in a built-up area, would,

along with the private residential garden constitute brownfield land, so, contribute to the spirit of the purpose though not the direct intent.

3.10 Government policy on the Green Belt is set out in the National Planning Policy Framework (NPPF) and is that local planning authorities should regard the construction of new buildings as inappropriate in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. However, the policy allows for exceptions of which only (g) is appropriate to these two sites (repeated below).

(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

3.10 The NPPF defines affordable housing and although gypsy and traveller pitches are not explicitly referenced it is understood that they would meet the term affordable housing. For example, under the 2016 to 2021 Shared Ownership and Affordable Homes Programme traveller pitches are eligible. Therefore, for both sites they can constitute exceptions as meeting an identified affordable housing need on previously developed land if they do not cause substantial harm to the openness of the Green Belt.

3.11 At Sunrise Cottage it is proposed that it would provide two additional pitches within the curtilage of the existing site and within an area to the east of Mile Tree Lane, Bulkington that has already been developed for several other gypsy and traveller accommodation plots. This would not reduce separation between Bulkington, Bedworth, and Coventry nor would it effect the openness of the Green Belt.

3.12 The Old Nursery would be the creation of a new site to accommodate up to six new pitches within the boundaries of a former garden nursery. The land forms the most southerly extent of a cluster of buildings to the west of Parrotts Grove, Coventry terminating north of a set of ponds. The opposite side of the road is also a cluster of buildings with a multitude of uses that extend further south than The Old Nursery site (of which much is in the neighbouring administrative area of Rugby). The intensification of the site would affect the openness of the Green Belt in its immediate vicinity but this would be in the context of being within an agglomeration of buildings that already forms one of the clusters distributed throughout the parcel. The effect on the openness of this parcel on the Green Belt and in its immediate vicinity is limited and less than substantial. The site would not reduce separation between Bulkington, Bedworth, and Coventry.

4.0 Conclusion

4.1 This document sets out how the sites that have the potential to accommodate additional gypsy and traveller pitches have been assessed and how this has been used to decide on which sites to allocate in the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It also explains how sites that are in the Green Belt have been assessed against the five purposes of the Green Belt and national guidance and whether the sites remain acceptable to allocate. Three sites have been found acceptable to allocate, namely:

1. Sunrise Cottage, Mile Tree Lane, CV2 1NT – additional three pitches provided through intensification of existing site;
2. The Old Nursery, Parrotts Grove, CV2 1NR – additional five to six pitches provided through change of use of land; and
3. Winter Oak, Watling Street, CV11 6BQ – additional six pitches provided through intensification of existing site.

These would provide a minimum of 14 pitches which would fulfil the need for new pitches in the borough up to 2036/37.

5.0 Appendices

Appendix 1 – Consultees and responses to potential additional gypsy pitches

Consultee	Response
Cadent	No response received.
Coventry and Warwickshire Clinical Commissioning Group	<p>The CCG has a duty to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106/Community Infrastructure Levy framework and that funding of future health provision and access is not compromised through housing development and population growth. Primary Care services and the associated infrastructure is already operating at capacity in this area. Noting the population growth numbers associated with the plan of a circa 15 increase in pitches. Using the standard planning calculation of 2.4 persons per pitch this will result in a forecast population increase of 36. The CCG whilst recognising the impact of growth on healthcare funding and access, notes that this growth is below the current threshold for infrastructure funding request by the CCG.</p>
Coventry City Council	No response received.
Environment Agency	<p>We have reviewed the following three potential sites to accommodate additional pitches in line with constraints that fall within our remit:</p> <p>Sunrise Cottage, Mill Tree Lane, CV2 1NT The Old Nursery, Parrots Grove, CV2 1NR Winter Oak, Watling Street, CV11 6BQ</p> <p><u>Flood Risk</u></p> <p>The proposed sites are located within Flood Zone 1 according to our Flood Map for Planning (Rivers and Sea). Therefore, we have no comments to make from a fluvial flood risk perspective.</p>

	<p><u>Additional Information</u> A Flood Risk Assessment will be required if sites are over 1ha or under 1ha in Flood Zone 1 where they could be affected by sources of flooding other than rivers and the sea (https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications). We advise contacting the Lead Local Flood Authority at Warwickshire County Council for further advice.</p> <p><u>Foul Drainage</u> Both the PPG and the Building Regulations 2010 (Approved Document H) set out a presumption in favour of connection to the public foul sewer wherever it is reasonable to do so: https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h. Private non-mains foul drainage systems are not considered to be environmentally acceptable within publicly sewered areas. We note the distance of the nearest mains sewers for the proposed site allocations are as follows: Sunrise Cottage – approx. 435m to the northeast The Old Nursery – approx. 480m to the southwest Winter Oak – approx. 35m to the east</p> <p>Under the Environmental Permitting (England and Wales) Regulations 2016, the discharge of polluting substances (including sewage effluent) into surface waters or the ground requires the authorisation of the Environment Agency. This authorisation may be either an Environmental Permit to control the discharge or a registered exemption. The authorisation is irrespective of any Planning Permission granted and may be withheld.</p> <p>Domestic effluent discharged from a septic tank / treatment plant at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24 hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.</p>
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	<p>The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice. Additional 'Environmental Permitting Guidance' can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one.</p>
<p>Environmental Health</p>	<p>No response received.</p>
<p>Highway Authority</p>	<p>Sunrise Cottage</p> <p>This is an existing site and additional pitches would be provided, thereby intensifying the use of the access.</p> <p>The existing gates are setback roughly 13.5 metres and have a width of 3.7 metres at that point. The site appears to have been operated as a Gypsy/Traveller site for some time and there have been no reported collisions to suggest the access has been detrimental to the highway.</p> <p>Visibility to the south is ok however visibility to the North is restricted by overgrown hedgerow at around 80 metres, so as part of any planning application the visibility will need to be improved. Mile Tree Lane has a speed limit of 50mph so visibility splays of 160 metres should be provided, the splay appears to be achievable with some cutting back of the hedgerow.</p> <p>Old Nursery</p> <p>There are concerns with the accesses to the site as they are currently set out. The site has 2 accesses that could operate as an in-and-out arrangement with one access close to the dwellings to the north (wayside) and the other adjacent to the recent conversion to a dwelling to the south.</p> <p>As part of any future planning application further information will be required to detail which access is to be used and what controls would be in place to restrict the use of the other access. The recent</p>

	<p>conversion of the existing building (accessed via the southern access - application 037168) showed boundary features were to be placed within the site to restrict access to the wider site therefore only providing access to the dwelling (effectively splitting the site in half). So, it appears that the northern access will need to be used. It will need to be shown what area would be used for pitches, which accesses can be used and how the use would affect the dwelling. Comments below on both accesses;</p> <p>Northern Access (Adjacent Wayside)</p> <p>There are concerns with this access that do not appear to be able to be overcome. Parrots Grove again has a speed limit of 50mph so visibility splays of 160 metres should be provided. Whilst this is achievable to the south, to the north the splay is restricted to around 42 metres due to the neighbouring wall and plantings. As the splay would go over 3rd party land improvements to the visibility are unlikely to be achievable. Available speed data shows average speeds of 40-45mph so the 85th percentile speeds are likely close to the posted limit so it is considered that 'y' distances of 160 metres would be required.</p> <p>The access may be too narrow to allow for a vehicle towing a caravan to pass another vehicle waiting within the access. The access needs to be made wide enough to allow a vehicle to enter the site and pass another vehicle waiting at the 'give-way' line without overrunning the footway/verge. Swept path analysis would be required to show that the manoeuvres are achievable.</p> <p>The gates may also need to be setback further to allow the largest vehicle to enter the site to completely exit the highway whilst the gates are opened/closed. See further comment below in general comments.</p> <p>Southern Access</p>
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	<p>This access is considered more suitable due to the increased width and improved visibility.</p> <p>However as mentioned above it is unclear if this access would be available for use.</p> <p>The existing gates are around 5.3 metres setback from the carriageway and have a width of 6 metres, as part of the previous application these gates are to be moved into the site to be setback 6 metres.</p> <p>During the site visit it was noted that the dwelling protrudes into the access, reducing the total width, which does not appear to be in accordance with the approved plans. This could result in conflict around the access as it may reduce the manoeuvring room for any vehicles entering/exiting the site.</p> <p>Visibility splays of 160 metres should be achievable for this access however the splay to the north would need to be measured to 1 metre out from the nearside of the carriageway due to the existing telegraph pole obstructing visibility to the nearside.</p> <p>The Highway Authority would recommend that 1 point of access is maintained to provide access to the site (Southern access) and the other access closed. If the separation of the site as a result of the recent planning application would not enable this to happen the Highway Authority has concerns with the Northern access and improvements do not appear to be achievable.</p> <p>PRoW B38 runs adjacent the site to the north so WCCs PRoW team may need to comment on the proposals.</p> <p>Winter Oaks</p> <p>This site is accessed off the A5 Watling Street which is owned and maintained by National Highways (NH). Additional pitches on the</p>
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	<p>site are unlikely to have a detrimental effect on the Highway Authority's network (Higham Lane). NH should therefore be consulted to comment on the suitability of the site access and impacts on their network.</p> <p>General Comments</p> <p>Further information will be required as part of any future planning applications to indicate the number of pitches being proposed, and what would occupy these pitches. Would all the pitches be static caravans or temporary with the caravans moving regularly?</p> <p>What size caravans would be proposed? Further information would be required to detail the size of any caravan and vehicle towing a caravan (if proposed). Looking at the existing sites there appears to be a mixture of caravan types however taking the worst case of a caravan of around 7 metres in length being towed by a long wheelbase Transit van (around 6 metres) the total length of the vehicle could be around 13 metres. Any gates within the access would therefore need to be setback a sufficient distance to allow the vehicle to exit the highway completely whilst the gates are opened or closed.</p> <p>Suitable bin collection points should be provided within the site so that bins are not stored within the highway for the old nursery site. NBBC refuse team will need to agree with the location of the collection point. The other sites are all existing however if the additional pitches would result in additional bins being presented on collection days, then suitable collection points will be needed for these additional bins.</p>
Hinckley & Bosworth Borough Council	No response received.
Historic England	No response received.
Lead Local Flood Authority	We have reviewed the attachments provided. Our standard approach will apply for any planning application that comes forward on these sites. If any are considered 'major' development, then we request to be consulted with an appropriate surface water drainage

	strategy and/or Flood Risk Assessment. Guidance on the required content of these documents is available on our website https://api.warwickshire.gov.uk/documents/WCCC-1039-95
National Grid	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.
National Highways	No response received.
Natural England	No response received.
North Warwickshire Borough Council	No response received.
Nuneaton and Bedworth Borough Council (Parks)	<p>Our only comment would be to emphasise each site should in some manner be properly assessed in terms of potential ecological impacts - as with any potential land that might be allocated in a Borough Plan - but the small scale of the sites - at least without checking site by site on aerial photography - suggests ecological impacts may be relatively limited - but a formal assessment should nonetheless be undertaken.</p> <p>My recollection is that WCC were engaged for these purposes in general last time around. I'd suggest though that any WCC findings are first shared internally with Parks / myself for a quick internal review due to some slightly inconsistent findings when they last undertook that exercise in relation to previous Borough Plan allocations.</p>
Rugby District Council	No response received.
Severn Trent Water	No response received.
Warwickshire County Council (Archaeology)	No response received.
Warwickshire County Council (Ecology)	No response received.
Warwickshire County Council (Education)	No response received.
Warwickshire County Council (Infrastructure)	<p>I have recently been made aware of this consultation and wanted to check with you if you had shared the details with the flood risk team at Warwickshire County Council?</p> <p>Other than highways I imagine flood would be the main contributors to your thinking. Other service areas are only likely to respond at planning application stage once the number of pitches is known.</p>
Warwickshire County Council (Planning)	No response received.
Warwickshire County Council (Travellers)	No response received.

<p>Warwickshire Police</p>	<p>With regards to the Three addresses below I have conducted some intelligence checks that do not reveal any information that would give cause for concern with the proposals for these three sites. Both Sunrise Cottage and Winter oaks are established family sites of a small size.</p> <p>I am assuming that the intensification of these sites will be for the purpose of additional family accommodation. If this could be clarified and also the additional numbers of caravans or statics that are being suggested. It would be useful to have an idea of the overall size of the site once the new pitches have been introduced.</p> <p>With regards to the Parrott’s Grove site there are no immediate concerns but again it would be useful to have an idea of the proposed size of the site as this is a new development.</p> <p>I am very keen to encourage the development of appropriate small provisions to assist in meeting the ongoing shortfall with accommodation needs of the GRT community. In general the only time we see significant problems from these developments is if they are too large and encourage being sold off out of family circle which on occasions if not effectively managed may have adverse impact on the community.</p> <p>From what I see with the information I have on these three proposed developments this is not the case.</p>
<p>Western Power</p>	<p>I have been passed your enquiry with regards to the Winter Oak site. I have attached a map of our network to show that if the site was to be expanded on surrounding land there may be a requirement for our 11kV overhead line to be diverted/undergrounded.</p> <p>I’ve attached a network diagram for each site and mentioned anything I can see that’s obvious.</p> <p>FYI - Diversions are of course possible, but they are chargeable jobs if needed.</p> <p>Sunrise Cottage – Overhead line (OHL) on the site which potentially may require diverting (dependant on location of plots and proximity to OHL)</p>

	<p>The Old Nursery – Existing supplies on site only Winter Oak – HV on site which may potentially need a diversion (for example if any additional access is required or changes to level of the ground) None of the sites have anything that’s a “show stopper” in terms of electricity, as you would say.</p>
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Appendix 2 – Summary of the assessment of sites with potential to provide additional gypsy pitches

Assessment Criteria	Site		
	Sunrise Cottage	The Old Nursery	Winter Oak
Green Belt?	Yes.	Yes.	No.
Area of Outstanding Natural Beauty	No.	No.	No.
Conservation Areas	No.	No.	No.
European / National Wildlife Site / Protected Species	No.	No.	No.
Flood Risk	No.	No.	No.
Heritage Assets	No.	No concerns, but in proximity to Grade II building.	No.
Local Wildlife Site	No.	No.	No.
Local Geological Site	No.	No.	No.
Major Infrastructure	No.	No.	No.
Minerals and Waste	No.	No.	No.
Access to Site	Already in place and acceptable.	Works needed to make existing southern access acceptable.	Already in place and acceptable.
Accessibility to Local Facilities	Access poor by means other than private car.	Access poor by means other than private car.	From the site a primary school can be accessed by public transport within 30 minutes. Also around 1.1 kilometres from a local centre which could be accessed by walking or cycling. Other than that

			other services would have to be accessed by private car.
Public Transport	No.	No.	Yes.
Relationship to Highway Network	Acceptable.	Acceptable.	Acceptable.
Public Rights of Way	No.	Yes, public right of way B38 adjoins part of the northern boundary of the site.	No.
Coalescence	No.	No.	No.
Integration with Settlement	Not relevant, site is generally remote from existing settlement but intensification of site would fit into existing built form.		Not relevant, site is separated by the A5 from existing settlement but intensification of site would fit into existing built form.
Neighbouring Amenity	Acceptable.	Acceptable.	Acceptable.
Neighbouring Land Uses	Acceptable.	Acceptable.	Acceptable.
Non-designated Heritage Asset	No.	No.	No.
Landscape Sensitivity	Acceptable.	Acceptable.	Acceptable.
Agricultural Land Classification	Not relevant.	Not relevant.	Not relevant.
Contaminated Land	No.	No.	No.
Tree Preservation Orders (TPO)	No.	No.	No.
Natural features	No, nothing within the site.	No, nothing within the site but existing hedgerows on site boundary.	No, nothing within the site but existing hedgerows on site boundary.
Pollution	No.	No.	No.
Site Assembly	Not relevant.	Not relevant.	Not relevant.
Site Topography and Shape	No.	No.	No.
Current Use	Gypsy and traveller pitches.	Residential.	Gypsy and traveller pitches.
Intentions	Acceptable.	Acceptable.	Acceptable.

Legal	No.	No.	No.
Ownership	Yes.	Yes.	Yes.
Suitable and Available?	Yes.	Yes.	Yes.
Site History	Acceptable.	Acceptable.	Acceptable.

Significant impact = RED
Some impact = AMBER
Minor / No impact = GREEN