

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
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28th July 2013

RE: Objection to proposed Gypsy & Traveller site GT02

I would like to register my objection to the proposed Gypsy and Traveller site, referred to as GT02, proposed at the land abutting the Fosse Way (B4455) at its junction with Southam Road (A425).

I believe this is an inappropriate location for a Gypsy and Travellers Site, and would not be suitable for its intended use. I understand that the site GT02 is being considered following an area search and site appraisal by a consultant Enfusion, however, I feel the site appraisal carried out by Enfusion is inaccurate and misrepresentative.

I outline below the reasons which I believe render the site unsuitable for a Gypsy and Travellers Site.

1. Economy

The Enfusion report is unable to reach a conclusion with regard to impact of the proposed site on Economy metric. However, the proposed search area is largely made up of the private land owned and used by the Warwickshire Exhibition Centre. This is a successful and established business, contributing to the local economy in a number of ways. Directly, the local economy benefits through income from the Exhibition Centre; indirectly, the Centre contributes to increased business for local pubs, restaurants, taxi companies, petrol stations and hotels, all of which enjoy the custom of the Exhibition Centre visitors. The Exhibition Centre owners have already indicated that they do not wish to sell the land to the council for the purpose of creating the site, and should this proposal go ahead, it will lead to the cessation of their business. They would have lost the land used to carry out exhibitions and would be unable to expand.

An economic impact assessment had already been submitted to the Council in respect of the Exhibition Centre. This details the severe economic implications of the loss of the Exhibition Centre on the local economy, including loss of income from the Exhibition Centre and its 40 employees, as well as lost trade from other businesses which at the moment enjoy the custom of the Exhibition Centre visitors.

In the light of the above, the site should be considered as having a strong negative impact on the Economy.

2. Sustainable transport and reduced need to travel

The Enfusion report gives the site a positive score on the Sustainable Transport and Reduced Need to Travel metrics, stating that there is a good access from the site to public transport and there is a bus stop nearby. However, the report fails to take account of the fact that there are no pedestrian facilities leading to the bus stop (i.e. footpath or footway), neither is there a hard standing on which to wait for a bus. The very bus stop is unmarked and unlikely to be spotted, unless specifically searched for. The only way of getting from the proposed site to the bus stop would be to walk directly along the road on the carriageway, among busy traffic, which is an extremely dangerous and unpleasant experience. This is unlikely to encourage use of public transport, and it has in fact deterred myself and members of my own community from ever considering using it or allowing children using it.

With regard to alternative modes of transport, ie walking or cycling, to any destination near the site, this is equally stressful and dangerous and should be strongly discouraged, particularly with regard to children. There are no pedestrian or cyclist provisions in the area at all, the roads are abutted by grassed yet muddy and uneven verges, and therefore any potential walker or cyclist would have to resort to travelling on a carriageway.

Roads abutting the site are busy and dangerous; despite this being a rural area, volumes of traffic are very high as both roads are busy through routes for the district and the county. The Fosse Way is particularly notorious, which is clearly shown by a large number of safety warning/casualty warning signs on the section of the road located directly in the middle of the search area. I have myself attempted to use a bicycle to travel to work in the past, but gave up after just a few days as it was a most unpleasant experience.

To conclude, the only suitable and accessible mode of transport, to any destination, is a journey by car. There are no local services or community facilities reachable via walking or cycling. The site location, total lack of provisions for non-motorised users, and an unreachable bus stop will not encourage use of public or alternative modes of transport, nor will it reduce the need to travel by car, hence the site should be considered as strong negative on these metrics.

3. Highway Safety and Noise

Enfusion report does not take any account of the proposed site location abutting two extremely busy roads, and subsequent safety implications of the same.

With regard to vehicular access and egress to and from the site, this would pose further issues. Being a highway engineer myself, I am dealing with highway access issues on regular basis. I am concerned that site access location would be dangerous due to impaired access and forward visibility on all approaches. With regard to access, due to large traffic volumes a formal junction with a dedicated right turn lane would likely be required as a minimum to satisfy road safety requirements; additional private land take would be required to accommodate this. A fairly substantial access would be required to accommodate the trailers, touring caravans etc which would be used by residents; this would further exacerbate the problem. Egress would be equally difficult with a potential for collisions, particularly between long vehicles (ie touring caravans) leaving the site and public using the road. All in all, there could be far reaching safety implications for both the potential residents and general public using these busy roads.

In addition, the roads would pose danger to young children living and playing at and near the site. Children could be tempted to play around the road, which could have serious safety implications.

Regardless of safety issues, large volumes of traffic generate a lot of noise. All potential residents would be subjected to this noise.

4. Local Services and Community Facilities

The Enfusion report gives the site a neutral score on this metric, stating that the nearest surgery and school are both 1.5m away. This is not correct. The site is outside the catchment area for the Harbury school, and the school in Radford Semele is nearing capacity. A new development of 100 new houses has recently been approved for construction in Radford and any remaining school places will be required to accommodate this approved development.

With regards to the doctors' surgery, the nearest ones are approximately 3.5-5 miles away and there are already issues with capacity, as well as waiting times for appointments. There are no local services or facilities i.e. shops, schools, doctors surgery etc which can be accessed via walking, cycling etc. A car journey is required for all movements.

With regard to services and utilities, this is a rural area with limited access to services and no access to mains gas or sewerage network. There is a limited rural electricity supply and poor telecommunication connections.

In recent years, planning applications for residential developments have been refused in this area, as it was considered unsuitable for such developments due to its lack of services and community facilities. As a result, the site should be considered as strong negative on this metric.

5. Prudent Use of Land and Natural Resources, Natural Environment and Landscape

The Enfusion report gives the site only a minor negative score on the Prudent Use of Land and Natural Resources, as well as Natural Environment and Landscape metrics. This is based on the fact that the site is a Greenfield site, and located outside the main settlements in an open countryside. Enfusion recommended hedges are maintained / introduced to blend the site into the landscape.

The Enfusion report fails to take into account that the site is proposed on privately owned land including private residential properties, a successful and established business (Warwickshire Exhibition Centre), and high value agricultural land which is being used for farming. The siting of the site would affect all the above uses, cause the loss of farming land and the cessation of the business. This cannot be considered a prudent land use. Also, the entire area search is privately owned and not offered to the council, it would have to be acquired via Compulsory Purchase.

The Enfusion report also fails to take into account the topography of the site and its proposed location in a natural valley. There are elevated approaches from three sides and the site would be clearly visible whilst approaching from the North, East and South. It would not be possible to hide or screen the site from view. This would have negative effect on both natural environment and landscape, and the privacy levels of the potential residents.

The Enfusion report states that the presence of protected species and the ecological value of the site are unknown. However, in their report of January 2013, with regard to the woodland adjacent to the area of search (site survey 42856), Forestry Commission reported that there is a badger set present, along with a Honey Buzzard nest containing a breeding pair. Bats, owls, sparrow hawks, woodpeckers and a variety of deer were also found. Further, adders, grass snakes, frogs, toads and newts were also found in two ponds included in the survey, located near the search area.

To conclude, due to its visible locality, ownership details, land use type and presence of local wildlife, the site should be considered a strong negative on both metrics.

6. Historic Environment

The Enfusion report is unable to reach a conclusion with regard to impact of the proposed site on Historic Environment.

However, as the report acknowledges, the site is located adjacent to a Roman road, and therefore there is a potential for archaeological artefacts to be found on site. This would have an adverse impact on construction schedule, delaying the works for unforeseeable lengths of time whilst archaeological works are taking place.

As a result, the site location should be considered to have a negative score on this metric.

Conclusion

The proposed site is unsuitable for a Gypsy and Travellers Site for a number of reasons, including economic impact, sustainable transport issues, highway safety, environmental impact, distance to local services and schools, prudent land use and historical environment impact.

In addition, the land identified in the search area is owned privately in its entirety, by a number of owners. This includes private residential owners and businesses, including Warwickshire Exhibition Centre. None of the owners are willing to sell the land, thus the site would have to be acquired by the Council through a Compulsory Purchase, leading to hardship for residents and cessation of business by the Warwickshire Exhibition Centre. Because of this impact, particularly on a successful business, the Compulsory Purchase will be defended with full strength and the process is unlikely to be solved quickly.

It would be an inappropriate use of public money to pursue this unsuitable site, particularly that it would lead to an economical loss in the already difficult economic climate.

I therefore urge you to reject this proposal.

Yours sincerely,

Miss Malgorzata Bialecka