

Warwick Apprenticing Charities

Representations to Sites for Gypsies and Travellers Document
(Warwick District Council, June 2013)



AMEC Environment & Infrastructure UK Limited

July 2013

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1. Introduction

AMEC, on behalf of Warwick Apprenticing Charities (hereafter referred to as The Charities), welcomes the opportunity to make representations on the Sites for Gypsies and Travellers document (June 2013) that Warwick District Council (WDC) is currently consulting on. The Charities have a number of land interests in the District.

We welcome the fact that in accordance with national planning policy for traveller sites¹ (hereafter referred to as the National Traveller Policy), WDC has undertaken an assessment of need², and this assessment has taken into account the context of the previous assessment³ which was undertaken for the South Housing Market Area of the West Midlands as part of the development of the Regional Spatial Strategy (RSS) for the West Midlands. The specific accommodation needs of gypsies and travellers have not been identified by WDC prior to this study that fed into the RSS. The Adopted Warwick District Local Plan does not contain any policies specific to the needs of gypsies and travellers.

It is understood that WDC undertook the most recent assessment for its own authority as other neighbouring authorities were all at different stages in the preparation of assessments and it was therefore not appropriate to undertake a joint assessment.

The remainder of this document sets out The Charities comments on the consultation document, on the approach to selecting sites and on particular sites that WDC has identified.

¹ Planning policy for traveller sites, CLG, March 2012.

² Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment: Warwick, Final Report, Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford, November 2012.

³ Gypsy and Travellers Accommodation Assessment for the South Housing Market Area of the West Midlands, 2008 (covering Bromsgrove, Malvern Hills, Redditch, Worcester, Wyre Forest, Wychavon, Stratford-on-Avon and Warwick).

2. General Comments

2.1 Plan Period

The 2012 Assessment identifies a need for 31 permanent pitches over the 14 year period between the time of the study in 2012 and 2026. The consultation document then identifies this need as being over the 15 year Local Plan period, with 25 of these pitches to be provided in the first 5 years. The Local Plan period is however from 2014 to 2029.

The National Traveller Policy states that local authorities should plan for sites over a reasonable timescale, and the National Planning Policy Framework⁴ (NPPF) requires Local Plans to be drawn up over an appropriate timescale, preferably a 15 year time horizon (paragraph 157). Given the time delay between preparation of the 2012 assessment and adoption of the Local Plan, there may be a need to carry out a further assessment to inform pitch provision for the latter part of the development plan period.

2.2 Deliverability

Paragraph 9 of the National Traveller Policy identifies the need for local planning authorities (LPAs) to update annually a supply of specific 'deliverable sites' sufficient to provide five years worth of sites against their locally set targets. The definition of 'deliverable' in relation to gypsy and traveller sites is that sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable (the definition of 'viable' is not set out in the National Traveller Policy or the NPPF). The Charities have concerns that some of the sites identified in the consultation document are not 'deliverable'.

LPAs should also identify a supply of specific 'developable sites' for years 6 to 10 and where possible 11-15. 'Developable sites' should be in a suitable location for travellers' site development and there should be a reasonable prospect that the site is available and could be viably developed. The Charities have concerns that some of the sites identified in the consultation document are not developable.

Sites that are in a suitable location for travellers' site development include sites that are in sustainable locations, for instance where there is good access to education, healthcare, employment and public transport, in locations where there are no significant negative effects from noise and air quality and in locations that are not at risk of flooding.

2.3 Pitch Requirements

The Regional Spatial Strategy for the West Midlands (RSS) identified a need for 23 permanent pitches in the district over a 10 year period from 2007. This requirement was based on the previous 2008 assessment for the

⁴ National Planning Policy Framework, CLG, March 2012.

South Housing Market Area. The most recent assessment which was undertaken specifically for Warwick District in 2012, identified a need for 31 permanent pitches and 6-8 transit pitches over a 15 year period from 2012. The level of need is therefore not significantly different. However, as the most recent assessment has only been undertaken for Warwick District it may not fully take into account provision in surrounding districts which may influence the level of need in the District.

3. Site Selection

3.1 Criteria to Guide Site Suitability and Site Selection

A number of the Council's criteria to assess site suitability as set out in paragraphs 7.3 and 7.4 of the consultation document are based on the criteria set out in the National Traveller Policy at paragraph 11. These are therefore considered to be appropriate. The additional criteria are also considered to be appropriate, although the fourth bullet point under paragraph 7.3 should also make reference to the health and well-being of travellers in relation to noise and air quality as the National Traveller Policy does (at paragraph 11e). The sixth and seventh bullet points on important features of the historic environment and landscape character are welcomed. Good access to welfare and employment should also be included and could be included within the first bullet point.

We also welcome reference to national guidance on site design and facility provision. Whilst 'Designing Gypsy and Traveller Sites' Good Practice Guide, CLG 2008 was published prior to the National Traveller Policy on Traveller sites, elements of it are still relevant.

The presumption in favour of sustainable development and the objective of contributing to the achievement of sustainable development is applicable to planning for gypsy and traveller sites (paragraph 7 of the National Traveller Policy). This should therefore be a key consideration in selecting suitable sites.

Paragraph 4 of the National Traveller Policy encourages local authorities to reduce the number of unauthorised developments. The consultation document does not specify whether or not WDC has given consideration to regulating existing unauthorised development in the District or whether that would be appropriate. This option should be thoroughly considered prior to making a decision on gypsy site allocations, although it is recognised that such sites will still need to meet the site selection criteria set out by WDC.

Consideration should also be given to the suitability of former and surplus employment sites within the District for re-use as gypsy and traveller site development.

4. Site Options

The Charities have a number of concerns about some of the sites that have been included in the consultation document. In particular, it would appear that some of the sites selected are not consistent with national policy in relation to sustainability nor are they consistent with the Council's own site selection criteria as set out in the consultation document.

The consultation document is vague about the site option/selection process. At paragraph 2.5 it refers to working in collaboration with Warwickshire County Council to identify sites, and making enquiries to local land agents and landowners who have submitted sites to be considered for other uses. There has also been contact with public bodies and statutory undertakers to identify land. It is not clear if this was a formal 'call for sites' process or not. Reference is made in the consultation document to additional 'areas of search' that have been selected by officers due to their potential for gypsy and traveller sites, being outside the Green Belt, close to the road network and within close to facilities. The District should be much clearer about the methodology behind the site selection process, in terms of which sites were submitted, and whether or not a sieving process has already been undertaken to discount sites that are unsuitable in terms of sustainability, impact on environmental or other designations.

The District should be much clearer about the methodology behind the site selection process, in terms of which sites were submitted, and whether or not a sieving process has already been undertaken to discount sites that are unsuitable in terms of their performance against site selection criteria including: sustainability, impact on environmental or other designations. From what information has been made available by the District Council, it is our considered view that the lists of sites included in the consultation have not yet undergone a thorough appraisal/sieving process. If such a process had been followed then the current list of sites would have narrowed down to those, which, amongst other things, are in a sustainable location, and well related to local services and facilities.

The importance of a sustainable location in the site selection process is well recognised, with a number of appeal cases having been refused on sustainability grounds. For example, at Market Harborough⁵, an appeal site was located around 1.4km from the centre of a small village and around 2.5km from the centre of a small town. There were no footpaths linking the site and village and it was therefore concluded that the appeal should not be allowed due to the site not being closely related to a settlement and, as a consequence, the reliance future residents would have on the private car. The sustainability of sites and proximity to facilities and services is therefore a key factor in identifying suitable sites.

The Charities' comments on specific sites identified in the consultation document are set out next.

⁵ APP/L2820/A/11/2166322, Black Paddock Appeal Decision, Market Harborough

4.1.1 GT11: Land at Budbrooke Lodge, Racecourse and Hampton Road (12 pitches)

This site is not considered to be suitable for gypsy and traveller accommodation. It does not meet a number of criteria identified by WDC for site selection purposes. The following table sets out those WDC criteria that are not met by the GT11 site and the reasons for this.

WDC criteria for site suitability	How does G11 meet the criteria?
Avoiding areas where there is the potential for noise and other disturbance	The site is located adjacent to the A46 dual carriageway. There are noise and potential health/pollution issues associated with locating a gypsy site so close to a busy dual carriageway. In particular, regard has to be had to the nature of gypsy and traveller accommodation. Double and triple glazing mitigation measures that could be appropriate to traditional houses will not be appropriate to caravans/mobile homes. The site does not meet this particular criteria.
Avoiding areas with a high risk of flooding	The eastern part of the site is at risk of flooding. Whilst development could avoid this part of the site, a key consideration should be the nature of the development proposed. Caravans and mobile homes are more vulnerable to flooding than traditional houses and therefore consideration should be given to the suitability of the site for this type of development. Whilst it may be appropriate to implement flood mitigation measures for traditional housing, this is unlikely to be viable for development of a gypsy and traveller site. The site does not meet this particular criteria.
Sites which can be integrated into the landscape without harming the character of the area.	Whilst the site is screened to a degree, this site is important to the structure and character of Warwick, therefore depending on the nature and quality of the development proposed, there could be harm to the character of the area. The site does not meet this particular criteria.

In addition to the above WDC criteria that are not met, The Charities have a number of other concerns about the suitability of this site, as follows:

- The site is not considered to be 'developable' in the definition set out in the National Traveller Policy (paragraph 9c). The site is not available now as the site is principally in the ownership of a third party, The King Henry VIII Endowed Trust. WDC would need to use compulsory purchase powers in order for the site to be available. There would therefore be significant financial and time considerations for WDC if this site was to be taken forward.
- The site is considered to have development potential, but the quality of development is key to ensuring that development is suitable and does not harm the character of this area.
- The site is adjacent to Warwick racecourse. The racecourse is a key economic driver in the local economy and a key recreational resource for the town, and therefore the quality and nature of any development in the immediate vicinity of the site is important. Very high quality development with appropriate mitigation measures is likely to be more appropriate than development for gypsy accommodation.

Appendix IV of the Final Interim Sustainability Appraisal (SA) of the Local Plan⁶, hereafter referred to as the SA, appraises the options for gypsy and traveller sites. It identifies four minor negatives scores (defined in the SA as potential sustainability issues where mitigation and or negotiation may be possible) for the site in relation to the following objectives:

- prudent use of land and natural resources;
- natural environment and landscape;
- air, water and soil quality; and
- climate change - adaptation and flood risk.

For the reasons set out above, site GT11 should not be taken forward as a site allocation for gypsy and traveller accommodation.

4.1.2 GT17: Service Area west of A46 Old Budbrooke Way (8 pitches)

It should be noted that table 10.1 of the consultation document refers to site GT17 as being ‘Land on Southbound carriageway of A46 (former Little Chef). However the plan for GT17 on page 32 shows the ‘Service Area west of A46 Old Budbrooke Way’ which is actually on the northbound carriageway. The SA also refers to site GT17 as being to the west of the A46. There is therefore an inconsistency between the table and plan. Comments below relate to the site that is to the west of the A46 on the northbound carriageway.

This site is not considered to be suitable for gypsy and traveller accommodation. It does not meet a number of criteria identified by WDC for site selection purposes. The following table sets out those WDC criteria that are not met by the GT17 site and the reasons for this.

WDC criteria for site suitability	How does G17 meet the criteria?
Convenient access to a GP surgery, school, and public transport	<p>There is no convenient access to GP surgeries, schools or public transport. The nearest social and community facilities are located in Hampton Magna which is over 2.5km by road. Although there are public rights of way in the vicinity of the site, there is no safe pedestrian/cycle link between the site and the village; the public rights of way would require walking through agricultural fields. In addition, there is no public transport route between the site and facilities in Hampton Magna. The site is therefore very poorly related to local facilities and services.</p> <p>The site does not meet this particular criteria.</p>
Avoiding areas where there is the potential for noise and other disturbance	<p>The site is located adjacent to the A46 dual carriageway. There are noise and potential health/pollution issues associated with locating a development so close to a busy dual carriageway. In particular, regard has to be had to the nature of gypsy and traveller accommodation. Double and triple glazing mitigation measures that could be appropriate to traditional houses will not be appropriate to caravans/mobile homes.</p> <p>There are potential health/air quality issues associated with proximity to the A46. There may also be potential safety issues associated with children from the development playing close to the A46. National Design guidance on gypsy and traveller sites (at paragraph 3.3) states that sites should not be situated near hazardous places as this will have a detrimental effect on general health and well being and pose safety</p>

⁶ Warwick District Council Local Plan, Final Interim SA Report, June 2013, Enfusion.

WDC criteria for site suitability	How does G17 meet the criteria?
	risks for young children. The site does not meet this particular criteria.
Sites which can be integrated into the landscape without harming the character of the area.	Whilst the site is screened to a degree, there is no surrounding development and the site would be isolated development that would harm the character of the area. The site does not meet this particular criteria.
Promotes peaceful and integrated co-existence between the site and the local community	The site is isolated from the local community in Hampton Magna, the nearest settlement. The edge of Hampton Magna is over 650m away from the site. There are no footpath/ cycle or bus links between the site and Hampton Magna, and therefore there is no opportunity for the residents to integrate with the existing community. National design guidance on gypsy and traveller sites identifies ease of access to local services and social contact with other residents as key locational factors (paragraph 3.2), neither of which are met by this site. The site does not meet this particular criteria.

In addition to the above WDC criteria that are not met, The Charities have a number of other concerns about the suitability of this site, as follows:

- The site is located in the Green Belt well beyond existing settlement boundaries. The National Traveller Policy on traveller sites clearly states at paragraph 14 that *“Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development”*. This has recently been backed up by the Written Ministerial Statement on 01 July 2013 by CLG on Planning and Travellers which states that *“The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development in the Green Belt.”* The Secretary of State has also recently started recovering appeals relating to gypsy sites in the Green Belt to ensure that sufficient weight is given to protection of the Green Belt in this context. There are no very special circumstances that justify development of the G17 site.
- The site is not sustainable due to the distance to local facilities and the lack of sustainable links between the site and local facilities. Development of the site will not in any way reduce the need to travel given the distance and difficult access to nearby facilities and services. Due to the site’s location on a dual carriageway, journey lengths may be increased because of the need to travel in one particular direction from the site, unless access was allowed onto both carriageways from the site.
- There could be an economic impact associated with locating a gypsy site adjacent to a service station as the two land uses may not be compatible.
- The National Traveller Policy on the design of gypsy and traveller sites states at paragraph 3.6 that sites should not be identified for gypsy and traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply. This site is not considered to be appropriate for residential dwellings and therefore should not be considered for gypsy and traveller use.

The SA identifies three major negative scores (defined in the SA as being problematic and improbable because of known sustainability issues where mitigation is likely to be difficult and/or expensive) for the site in relation to the following objectives:

- sustainable transport;
- reduce need to travel; and
- local services and community facilities.

The SA states that there is currently no access to public transport or safe pedestrian walkways and local services and facilities are just under three miles away (in Warwick). It goes on to state that mitigation is made difficult because of the by-pass and there would need to be a requirement for a bridge to connect the site to the east where there are services and facilities (in Warwick). The SA recommends that there are infrastructure requirements required to ensure the right level of improvement and upgrade is achieved.

In addition, the SA identifies two minor negative scores in relation to:

- natural environment and landscape; and
- air, water and soil quality.

For the reasons set out above, site GT17 should not be taken forward as a site allocation.

4.1.3 GT18: Service Area east of A46 (6 pitches)

It should be noted that table 10.1 of the consultation document refers to site GT18 as being ‘Land on Northbound carriageway of A46 (former Little Chef). However the plan for GT17 on page 33 shows the ‘Service Area east of A46 Old Budbrooke Way’ which is actually on the southbound carriageway. The SA also refers to site GT18 as being to the east of the A46. There is therefore an inconsistency between the table and plan. Comments below relate to the site that is to the east of the A46 on the southbound carriageway.

This site is not considered to be suitable for gypsy and traveller accommodation. It does not meet a number of criteria identified by WDC for site selection purposes. The following table sets out those WDC criteria that are not met by the GT18 site and the reasons for this.

WDC criteria for site suitability	How does G18 meet the criteria?
Convenient access to a GP surgery, school, and public transport	<p>There is no convenient access to GP surgeries, schools or public transport. The nearest social and community facilities are located to the south east in Warwick, over 1km away (across fields, as the crow flies). There is no safe pedestrian/cycle link between the site and the urban area of Warwick. Whilst there are public rights of way in the area, these do not directly link the site with local facilities. Access to facilities in Warwick would require walking through private fields. In addition, there is no public transport route between the site and facilities in Warwick. The journey by car would be over 3.5km due to the site's location on a dual carriageway. The site is therefore very poorly related to local facilities and services.</p> <p>The site does not meet this particular criteria.</p>
Avoiding areas where there is the potential for noise and other disturbance	<p>The site is located adjacent to the A46 dual carriageway. There are noise and potential health/pollution issues associated with locating a development so close to a busy dual carriageway. In particular, regard has to be had to the nature of gypsy and traveller accommodation. Double and triple glazing mitigation measures that could be appropriate to traditional houses will not be appropriate to caravans/mobile homes.</p> <p>There are potential health/air quality issues associated with proximity to the A46. There may also be potential safety issues associated with children from the development playing close to the A46. National Design guidance on gypsy and traveller sites (at paragraph 3.3) states that sites should not be situated near hazardous places as this will have a detrimental effect on general health and well being and pose safety risks for young children.</p> <p>The site does not meet this particular criteria.</p>
Sites which can be integrated into the landscape without harming the character of the area.	<p>Whilst the site is screened to a degree, there is no surrounding development and the site would be an isolated pocket of development that would harm the character of the area.</p> <p>The site does not meet this particular criteria.</p>
Promotes peaceful and integrated co-existence between the site and the local community	<p>The site is isolated from the local community in Warwick, the nearest settlement which is over 1km away. There are no footpath/cycle or bus links between the site and Warwick, and therefore there is no opportunity for the residents to integrate with the existing community. National design guidance on gypsy and traveller sites identifies ease of access to local services and social contact with other residents as key locational factors (paragraph 3.2), neither of which are met by this site.</p> <p>The site does not meet this particular criteria.</p>

In addition to the above WDC criteria that the site does not meet, The Charities have a number of other concerns about the suitability of this site, as follows:

- The site is located in open countryside well beyond existing settlement boundaries.
- The site is not sustainable due to the distance to local facilities and lack of any sustainable links between the site and local facilities. Development of the site will not in any way reduce the need to travel given the distance and difficult access to nearby facilities and services.
- There could be an economic impact associated with locating a gypsy site adjacent to a service station as the two land uses may not be compatible.
- The National Traveller Policy on the design of gypsy and traveller sites states at paragraph 3.6 that sites should not be identified for gypsy and traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply. This site is not considered to be appropriate for residential dwellings and therefore should not be considered for gypsy and traveller use.

The SA of the Local Plan identifies three major negative scores (defined in the SA as being problematic and improbable because of known sustainability issues where mitigation is likely to be difficult and/or expensive) the site in relation to the following objectives:

- sustainable transport;
- reduce need to travel; and
- local services and community facilities.

In relation to the above, the SA states that there is currently no access to public transport or safe pedestrian walkways and local services and facilities are just under three miles away. It recognises that mitigation is made difficult because of the by-pass and at this stage, little detail is known about existing traffic and transport issues and how the allocation will affect them. The SA recommends that there are infrastructure requirements required to ensure the right level of improvement and upgrade is achieved and it refers to the possibility of providing a pedestrian/cycling linkage with GT11.

In addition, the SA identifies three minor negative scores in relation to:

- prudent use of land and natural resources;
- natural environment and landscape; and
- air, water and soil quality.

For the reasons set out above, site GT18 should not be taken forward as a site allocation.

5. Conclusions and Recommendations

The Warwick Apprenticing Charities supports the Council's criteria to assess site suitability as set out in paragraphs 7.3 and 7.4 of the consultation document. These criteria accord with the National Traveller Policy. Also in accordance with the National Guidance, an up to date assessment of need has been undertaken.

However, The Charities have concerns about the site selection process generally as the process has not been clearly set out in the consultation document. The site selection process does not appear to have narrowed sites down to those that are sustainable, e.g. those that are well located in relation to local community services and facilities including public transport, and those that are not located in the floodplain. Notwithstanding this, the Charities have particular concerns about the suitability of three of the sites identified in the consultation document, which do not accord with the site suitability criteria that WDC has set. The three sites in question and the key reasons why the sites are unsuitable as locations for gypsy and traveller accommodation are as follows:

- **GT11: Land at Budbrooke Lodge, Racecourse and Hampton Road.** There are flood risk issues, noise issues, concerns about the quality of development and its impact upon the race course which is a key economic driver in the local economy. These could be mitigated if the proposed development was for traditional housing, but such mitigation is unlikely to be viable associated with gypsy and traveller accommodation, particularly as the site would need to be compulsorily purchased, with associated financial and time implications.
- **GT17: Service Area west of A46.** The site is not sustainable due to the distance to local services, facilities and public transport. There are no footpaths linking the site to the nearest village and therefore most journeys would be by car. These journeys would be long due to the site's location on one side of a dual carriageway. The site is in the Green Belt and there are no very special circumstances to justify its development. There are noise and safety concerns associated with locating a site so close to the A46. The site would be an isolated area of development with no links to the existing community. The site is inappropriate for traditional residential development, and therefore is not suitable as a gypsy and traveller site.
- **GT18: Service Area east of A46.** The site is not suitable due to the distance to local services, facilities and public transport. There are no footpaths linking the site to the nearest settlement and therefore most journeys would be by car. These journeys would be long due to the site's location on one side of a dual carriageway. There are noise and safety concerns associated with locating a site so close to the A46. The site would be an isolated area of development with no links to the existing community. The site is inappropriate for traditional residential development, and therefore is not suitable as a gypsy and traveller site.

The Sustainability Appraisal of the Local Plan identifies negative effects associated with development of the above sites for gypsy and traveller accommodation. There are a number of potential gypsy sites that score more highly in the Sustainability Appraisal and would be more suitable for use as gypsy and traveller sites. Together these sites provide more than enough pitches to meet the District's identified need.

The Charities object strongly to sites GT11, GT17 and GT18 being considered as potential gypsy and traveller accommodation, and calls for the sites to be withdrawn from further consideration. Instead the Charities

recommend that alternative sites which are more sustainable and suitable for this proposed use are taken forward and allocated.