

Development Policy Manager  
Development Services  
Warwick District Council  
Milverton Hill  
Leamington Spa, CV32 5QH

**RE: WARWICK DISTRICT COUNCIL'S CONSULTATION ON PROPOSED TRAVELLER SITES FOR GYPSIES AND TRAVELLERS PREFERRED OPTIONS FOR SITES**

**RESPONSE TO PROPOSED SITE GTalt03: Land at Henley Road/Hampton Road, Hampton on the Hill, Warwick.**

**Criterion: Impact on the green belt**

Site GTalt03 is in the Green Belt. The Government has consistently stated that Green Belt Land should only be used in very exceptional circumstances.

On 1 July 2013, in his written statement to Parliament, Brandon Lewis MP, Local Government Minister stated:

*"Our policy document planning policy for traveller sites was issued in March 2012. It makes clear that both temporary and permanent traveller sites are inappropriate development in the green belt and that planning decisions should protect green belt land from such inappropriate development ... .*

*... it has become apparent that, in some cases, the green belt is not always being given sufficient protection that was the explicit policy intent of ministers.*

*The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on the 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."*

This was reiterated by Brandon Lewis in his 17 January 2014 statement:

*"The Secretary of State remains concerned about the extent to which planning appeal decisions are meeting the government's clear policy intentions, particularly as to whether sufficient weight is being given to the importance of green belt protection. Therefore, he intends to continue to consider for recovery appeals involving traveller sites in the green belt."*

Planning Policy for Traveller Sites (PPTS) states:

*"Policy E: Traveller Sites in Green Belt*

*14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very exceptional circumstances. Traveller sites (temporary or permanent) in the green belt are inappropriate development”*

WDC has not shown very exceptional circumstances exist for including GTalt03 in the list of preferred sites. This contravenes government policy.

The Consultation Document should state that planning permission has also been refused due to its impact on the Green Belt.

In addition, the Green Belt argument was used against Kite’s Nest site being a gypsy and traveller site. It is less than a mile away and the sites are in several aspects similar, therefore this argument applies equally if not more so to Site GTalt03. To oppose the Kites Nest site on the grounds of impact on Green Belt and propose GTalt03 site when on Green Belt land would also show a lack of consistency in WDC’s appraising of sites with similar issues.

The Inspector’s report from Kites Nest refusal stated:

*“For development to be allowed in the Green Belt, very special circumstances need to be identified. What constitutes very special circumstances are not identified by local planning authorities. The term is consequently a moving target as appear to be the weights and measures used to arrive at a weighted decision. The appellants (at Kites Nest) provided a list of 15 issues that could be considered as very special circumstances as to why the development should be allowed. These did not include such common issues as health, education or children. The issues are complicated and fraught.”*

Impact on the Green Belt should alone be a sufficient ground for refusal.

**Criterion: Proximity to other residential properties**

The Kites Nest inspector found and the Secretary of State agreed that the Kites Nest site was situated within the local community of about 10 households, and that community would be dominated by a 13 or 8 pitch scheme. The same argument applies for site GTalt03, which is close to other properties

The use of the term “community” is deliberate; it is not the same as settlement or that term would have been used. There is a close-knit and neighbourly sense of community amongst the occupiers of the 10 or so dwellings in the immediate vicinity of the proposed GTalt03 site.

The Kites Nest inspector accepted that the scattered houses do form an identifiable community. The houses on that side of Hampton on the Hill community similarly form a community and therefore it could be argued that

approval of site GTalt03 would be going against the inspector's comments, which have helped WDC in the past.

PPTS Policy B, paragraph 11(a) states that policies should "*promote peaceful and integrated co-existence between the site and the local community*". PPTS - Policy C states that authorities should "*ensure that the scale of such sites does not dominate the nearest settled community*".

For the above reasons, selection of Site GTalt03 would appear to contravene these policies.

**Criterion: Safe Access from the Site for vehicles and pedestrians.**

Approval of the GTalt03 site would locate the pitches between the fast and busy Henley Road and an access road into Hampton on the Hill community at this section of the proposed site the road bends hence partially blind spots. Traffic on this road is already dangerous and if proposed site developments occur it would be set to increase.

Movement of caravans and large vehicles in and out of the site on such a fast and busy road would not only be potentially dangerous to the proposed occupiers of the GTalt03 site it could increase the likelihood of more accidents to other traffic.

**Criterion: Impact on visual amenity including the visibility of the site and surrounding area.**

The previous inspector involved with Kites Nest found that the development was very prominent through "gappy hedges" and from public footpaths, and that the existing caravans were an "extremely jarring element". The secretary of State agreed with this assessment.

Site GTalt03 would be similarly visible as it is directly on the main road. The road is higher than the proposed site so that it would be overlooked. There will be a habitat buffer could be argued that similar screening would be required on the road side to give the residents privacy from passing traffic and to screen off the caravans from the neighbouring houses. Screening issues for Site GTalt03 are even more extensive than Kites Nest.

Two previous planning applications for development have been turned down it is now contradictory to approve for travel site

**Criterion: Distance to nearby Schools ... etc.**

Education would have to be provided for gypsy children and it has been suggested that children could attend Budbrooke School. Budbrooke School is already struggling with numbers due to rising population. Ferncombe School in Hatton is also full.

**Criterion: Impact of land contamination, noise and other disturbance**

The pitches present potential land contamination if dumping of rubbish takes place on the site (i.e. the entrance to Aylesford school only last week).

**Compliance with PPTS - health and wellbeing**

**It is noted that no criterion is listed to address this policy and it should be.**

PPTS Policy B - Paragraph 11(e) states that local planning authorities should, ensure that their policies:

*“ provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development .”*

The GTalt03 site is adjacent to nearby dangerous main roads A46 and Henley road. There could be detrimental effects to the health and well being of young children living near these roads does not appear to comply with this Policy.

I wish this document to be regarded as my personal representations against the GTalt03 site.

