

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

4<sup>th</sup> May 2014

**Objection to GT19 in response to the consultation document “Warwick District Council March 2014, Sites for Gypsies and Travellers, Preferred Options for Sites”**

Dear Sir / Madam,

I am writing to you to submit my objection to the proposed Gypsy and Traveller site on the land adjacent to the Shell Petrol Station, Birmingham Road, Budbrooke, Warwick – site reference GT19.

My main concerns are as follows;

- Safety at GT19
- Inappropriate use of the Green Belt
- GT19 is not previously developed land.
- Why GT19 is being considered given the many similarities to Kites Nest

**Safety at GT19**

As a mother of an 8 year old, my over-riding concern is the safety of children living on this proposed site. GT19 is a confined site which has roads on two sides, the canal on another side and then private property on the last. The A4177 is a busy road being the main route into Warwick from Solihull and Knowle. It is restricted to 40mph but this is not always observed and has been the site of 2 fatal accidents within the last 5 years. Ugly Bridge Road is also a busy road used by many driving to and from Hampton Magna and Chase Meadow. This route has become increasingly popular due to the high volume of traffic on the A4177.

There are a number of houses along the A4177 owned by families. Children from these houses do not play in their front gardens because of the dangers associated with this road. Their back gardens are made safe with fences and gates to prevent children wandering on to the canal.

The Communities and Local Government Planning Policy for traveller sites (taken from [www.gov.uk](http://www.gov.uk)) states that

*“24. When considering applications, local planning authorities should attach weight to the following matters:*

*(.....)*

*d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community”*

It is difficult to see how you can balance the safety needs of the children on site without enclosing the site and making the occupants feel deliberately isolated from the rest of the community.

### **Inappropriate use of the Greenbelt**

On 4<sup>th</sup> February this year, The Minister responsible for Travellers, Brandon Lewis MP, said:

*“Our policy strengthens protection of the Green Belt and the open countryside by making clear that Traveller sites are inappropriate for greenbelt development and that local authorities should strictly limit the development of new Traveller sites in the open countryside. Unmet demand — whether for traveller sites or for conventional housing — is unlikely to outweigh harm to the greenbelt to constitute the exceptional circumstances that justify inappropriate development in the greenbelt.”*

Government policy has been supplemented by a Ministerial statement in July 2013 which, although focussing on development management decisions and the interpretation of the G&TPP, sets the general approach expected by the Government with regard to providing sites in the Green Belt:

*“... the single issue of unmet demand, whether for travellers’ sites or conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the very special circumstances to justify inappropriate development.”*

At no point in this process has Warwick District Council highlighted what the “very special circumstances” are. This is the only “preferred site” that is located within the Green Belt and there are other alternative sites available that are not. We should be doing everything we can to protect the Green Belt and the countryside for future generations.

### **GT19 is not previously developed land**

Having read through the previous planning submissions made for Oaklands Farm, Warwick District Council have refused a number of plans submitted by the existing landowner, based on the fact that

1. the site is situated within the Green Belt
2. the site is situated within the Special Landscape Area known as Arden Parklands
3. there are implications for highway safety on the A4177.

It seems very strange that now that Warwick District Council would like to use GT19 as a Gypsy and Traveller site the plot is described as *“previously developed land ..... (and) has an urban feel.”*

The specific plot of land identified as GT19 is currently an open field with some hedgerows and trees. It has not been previously developed and the area does not *have* an urban feel to it.

This field is currently being used as a certificated site. This is very different to a standard camp site. The Camping and Caravanning Club have been granted an exemption by Natural England enabling them to assist landowners in setting up and operating small campsites without the need for planning permission. This is to allow landowners to make a living whilst not adversely affecting the countryside.

A certificated site is a small, privately run campsite that can accommodate up to a maximum of five caravans or mobile homes, generally up to a maximum of a 28 day stay. If the site plans to offer all weather pitches, shower or toilet blocks this is not covered by the planning exemption and planning permission would need to be sought.

A Certificated Site that is limited to five caravans / motorhomes and provides only a tap for drinking water, a toilet and a waste disposal point is very different to a permanent traveller site with five static caravans, five traveller caravans, motor vehicles, utility block, shower block and a play area for the children. This is a far greater density of development and will create a dramatically different look to what is there today.

## **Why GT19 is being considered given the many similarities to Kites Nest**

Below I have detailed some of the key points taken from the planning decision regarding the Kites Nest Site. This decision was taken back in October 2013 (only 7 months ago). How much has planning changed since then? There are so many similarities between the two sites.

Department for Local Communities and Local Government – Decision from Stuart Caruthers regarding Kites Nest.

*The Secretary of State agrees with the Inspector that .....*

- *substantial weight should be given to the harm caused to the green belt as a result of the proposed inappropriate development*
- *the proposals would result in a very dense and prominent form of development that would not integrate into the landscape*
- *the appeal proposals would cause significant harm to the openness of the Green Belt.*

Information submitted by the Planning Inspectorate to the Secretary of State regarding the appeal at Kites Nest

- *The proposal constitutes inappropriate development within the West Midlands Green Belt as set out in the National Planning Policy Framework and so is harmful by definition.*
- *there is a likelihood that need could be met on sites outside the Green Belt.*
- *the site lies within the Arden Parklands landscape type as defined in the Warwickshire Landscape Guidelines. This document has been adopted as Supplementary Planning Guidance (SPG) and is based upon a detailed analysis of the landscape.*
- *the appeal if allowed ..... even with substantial landscaping would still be materially harmful in terms of visual impact ....*
- *the Inspector found that the development caused substantial harm due to the deduction in openness and encroachment into the countryside. .... Described the development as being very prominent with the caravans being extremely jarring in the attractive landscape ..... Accentuated by its location at a road junction and is surrounded by footpaths. This increases the prominence of the site and increases the harm to visual amenity.*
- *the present development on the site is clearly visible from all directions. .... Mobile homes are taller than touring caravans .... Increasing visibility and harm caused to the surrounding countryside.*

Given that the site at Kites Nest was refused planning permission only seven months ago why is the development of GT19 even being considered?

I look forward to seeing a revised proposal for the development of Gypsy and Traveller sites with GT19 being removed from the list of options as a result of this consultation process.

Yours faithfully,

Lisa Price