

H8 NEW GYPSY AND TRAVELLER SITES

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Whilst we support the criteria of policy H8, in so far as they are written, we are concerned that the policy would not allow Council planning officers to take into account the following material considerations when making decisions.

Firstly, the policy and supporting explanation appear to proceed from the premise that it is the size of the site that causes the most problems. In our experience, problems arise most often where transit pitches are located alongside or near permanent ones and available on a 'first come first serve basis'. This is a potential problem because the gypsy and traveller community is not a homogenous one and this can lead to unintended consequences. By way of an example, we are aware of disputes that could be exacerbated if sites had transit and permanent pitches in close proximity.

Secondly, once permission has been granted for a new site, it is quite possible that over the plan period further planning applications will be made to extend it. The policy therefore needs to give this possibility consideration and provide safeguards as to how to stop conflicting groups locating on the same site.

Both of the above are critical issues, not just to the families and communities concerned, but also from the perspective of the wider local community as well as the police. If the new Plan addresses them, it will achieve sustainable development from a social perspective, as required by paragraph 7 of the National Planning Policy Framework (NPPF) and paragraph 11 of the '*Planning Policy for Traveller Sites*' (DCLG, March 2012).

Thirdly, easy access to the emergency services is just as important to gypsy and traveller communities as it is to the settled community. This needs to be recognised in Policy H8.

Fourthly, Policy H8 as drafted contains no mention of the partnership work that is required when sites for gypsy and traveller pitches are proposed, given the often contentious nature of such proposals. The policy should cover discussions at the pre-application stage right through to when a decision on a planning application is made.

In this regard, there is an active part for the police to play in highlighting and advising on potential social, design and infrastructure issues around such applications. It is considered that the inclusion of a specific planning policy recognising this would be in accordance with paragraph 6 of the '*Planning Policy for Traveller Sites*' (Department for Communities and Local Government (DCLG), March 2012).

To elaborate further on how this would work in practice, upon receipt of an enquiry the allocated lead for community cohesion within Warwickshire Police (WP) would be notified. These leads are responsible for improving engagement with and service delivery to gypsy and traveller communities. The intention is to build effective long-term relationships, to increase trust and confidence and help address issues of concern. In addition, they also play an active role to

educate and train WP personnel to identify and eliminate discriminatory practices. They also ensure procedures and police use of enforcement powers is carried out in a targeted and intelligence-led manner when dealing with crime and anti-social behaviour.

The allocated leads work with individual Safer Neighbourhood Teams (SNTs) to ensure that there is an appointed neighbourhood officer and PCSOs to deliver policing services to gypsy and traveller sites. They will work with the communities and respond according to the needs of all those concerned.

This means that local WP officers and staff have a significant amount of knowledge and experience to draw on in this area, which we advocate that the Council makes use of in a structured and coordinated way, as part of on-going positive partnership work between the respective organisations.

Finally, policy H8 makes no reference as to how new sites would contribute to the achievement of the Government's objectives for the planning system set out in paragraphs 58 and 69 of the National Planning Policy Framework (NPPF). In this regard, including policy support for Secured by Design would help to ensure new pitches complied with a nationally recognised standard.

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To resolve all of our concerns and significantly improve the effectiveness of policy H8, we request that the following amendments are made: -

*H8 New **or Extended** Gypsy and Traveller Sites*

*Applications for new **or extended** Gypsy and Traveller sites will be approved provided that:*

- a) proposals have been subject to pre-application consultation with the Council, Police, local stakeholders and the community;***
- b) the site is within reasonable distance of schools, GP surgeries, dentists, hospitals, emergency services, shops and community facilities;***
- c) the site would not result in permanent and transitory pitches being co-located;***
- d) the site has good access to the major road network;***
- e) the site is of a suitable size to accommodate between 5 and 10 pitches for permanent sites or 12 pitches for temporary sites;***

- f) it can be demonstrated that infrastructure requirements can be adequately met; **and***
- g) high quality design, layout, landscaping and screening is proposed incorporating Secured by Design standards***

H6 HOUSES IN MULTIPLE OCCUPATION AND STUDENT ACCOMMODATION

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Overall, we welcome and support the proposed policy approach by the Council to control the location of new Houses in Multiple Occupation (HMO's).

Alongside the problems associated with such properties identified in paragraphs 4.60-4.66, we would add that HMOs are also frequently recorded for breaches of fire safety regulations. They are also amongst the most common type of domestic dwelling for where crimes against the occupants take place. Other typical problems associated with such properties include increased levels of burglary and a proliferation of on-street parking, which prevents ease of access by emergency vehicles. Such problems are multiplied exponentially where HMOs are concentrated in particular areas.

Despite these common and well documented problems, policy H6 to our concern makes no reference to them at all in the proposed criteria for assessing whether planning permission should be granted for HMOs. We therefore ask that the amendments proposed below are made to policy H6.

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We propose the following amendment to policy H6 to resolve all of our concerns and ensure the policy's effectiveness: -

'Planning permission will only be granted for Houses in Multiple Occupation, including student accommodation, where...

f) Secured by Design measures are incorporated throughout;

g) Highway safety and ease of access for emergency vehicles is not detrimentally affected; and

h) Appropriate fire precaution facilities and equipment are provided of such type, number and location as is necessary to ensure fire safety.'

There would be three major benefits of accepting the proposed amendments: -

1. People living in HMOs will enjoy much greater protection from crime and the fear of crime than is currently the case in such properties.

2. Emergency services response times will be protected in those areas where HMOs are located.
3. The number of deaths, injuries and properties damaged from fire will be reduced in Warwick District.

Publication Draft Representation Form 2014

For Official Only	
Person ID	
Rep ID	

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This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 27 June 2014**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or **email:** newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa
Leamington Town Hall, Parade, Royal Leamington Spa
Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
Brunswick Healthy Living Centre, 98-100 Shrubland Street, Royal Leamington Spa
Finham Community Library, Finham Green Rd, Finham, Coventry

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title	Mr		
First Name	Andrew		
Last Name	Morgan		
Job Title (where relevant)	Estate Strategic Planner		
Organisation (where relevant)	Warwickshire Police and West Mercia Police		
Address Line 1	Estate Services HQ		
Address Line 2	Hindlip Hall		
Address Line 3	PO Box 55		
Address Line 4	Worcester		
Postcode	WR3 8SP		
Telephone number	01905 332885		
Email address	andrew.morgan.60139@westmercia.pnn.police.uk		

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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Person ID:

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:	<input type="text" value="Local Plan"/>
Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="H6 Houses in Multiple Occupation and Student Accommodation"/>
Policies Map Number:	<input type="text"/>

5. Do you consider the Local Plan is :

5.1 Legally Compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.2 Complies with the Duty to Co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5.3 Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:	<input type="checkbox"/>
Justified:	<input type="checkbox"/>
Effective:	<input checked="" type="checkbox"/>
Consistent with National Policy:	<input type="checkbox"/>

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9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Andrew Morgan

Date :

26 June 2014

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Paragraph Number:	<input type="text"/>
Policy Number:	<input type="text" value="H8 New Gypsy and Traveller Sites"/>
Policies Map Number:	<input type="text"/>

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