

WDC PLANNING
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 25 JUL 2013
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Gypsy and Traveller Site Options Response Form 2013

For Official Use Only
 Ref: 574
 Rep. Ref.

Please use this form if you wish to comment on the Gypsy and Traveller Site Options.

If you are commenting on multiple sites you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the consultation documents have been made available (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

| | 1. Personal Details | 2. Agent's Details (if applicable) |
|--|---------------------|------------------------------------|
| Title | MR | |
| First Name | RICHARD | |
| Last Name | WOOD | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| Address Line 1 | | |
| Address Line 2 | | |
| Address Line 3 | | |
| Address Line 4 | | |
| Postcode | | |
| Telephone number | | |
| Email address | | |
| Would you like to be made aware of future | | |
| About You: Gender | | |
| Ethnic Origin | | |
| Age | | |
| Where did you hear about this consultation | | |

LOCAL PLAN

Gypsy and Traveller Site Options Response Form 2013

WDC PLANNING
 25 JUL 2013
 SCANNED
 00:00:00 AM
 GEN. DISTRICT OFFICE ONLY

214

Please use this form if you wish to comment on the Gypsy and Traveller Site Options. If you are commenting on multiple sites you will need to complete a separate copy of Part B of this form for each representation. This form may be photocopied or alternatively emailed to the Council's offices or places where the consultation documents have been made available to the public. You can also respond online using the LDP Consultation system visit www.warwick.gov.uk/development

Part A - Personal Details

Personal Details (if applicable)

First Name: RICHARD
 Last Name: WOOD
 Job Title (if applicable):
 Organisation (if applicable):
 Address Line 1: KINGS HOLE FARM
 Address Line 2: BOMBYL
 Address Line 3: WOODS
 Address Line 4:
 Postcode: CV32 2PB
 Telephone Number:
 Email address:

Would you like to be made aware of future consultations on Gypsy/Traveller sites? Yes No

Spot Your Gender

Home Origin

Age: 45-54 21-34 15-24 05-14 00-04

Where did you first hear about the consultation? (You can select more than one)

Part B - Commenting on the Gypsy and Traveller Site Options

If you are commenting on multiple sites you will need to complete a separate sheet for each representation

Sheet of

The policy in the Draft Local Plan will list the criteria by which Gypsy and Traveller sites will be judged for suitability and sustainability. These are the criteria:

- Convenient access to a GP surgery, school and public transport;
- Avoiding areas with a high risk of flooding;
- Safe access to the road network and provision for parking, turning and servicing on site;
- Avoiding areas where there is the potential for noise and other disturbance;
- Provision of utilities (running water, toilet facilities, waste disposal, etc);
- Avoiding areas where there could be adverse impact on important features of the natural and historic environment; and,
- Sites which can be integrated into the landscape without harming the character of the area.
- Promotes peaceful and integrated co-existence between the site and the local community;
- Avoids placing undue pressure on local infrastructure and services;
- Reflects the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Please give your views about site suitability below with reference to this list of criteria.

Which site are you responding to?
(e.g. GT01 - Land adj. to the Cobalt Centre, Siskin Drive)

GT13 KITES NEST LANG

What is the nature of your representation? Support Object Comment

Please set out full details of your objection or representation of support with reference to the criteria above.

SEE ATTACHED SHEETS.

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Ref:

Rep. Ref.

Part B - Commenting on the Gypsy and Traveller Site Options

If you are commenting on multiple sites you will need to complete a separate sheet for each representation

The policy in this Part of the Plan will list the criteria by which Gypsy and Traveller sites will be judged for suitability and sustainability. There are the criteria:

- Convenient access to a GP surgery, school and public transport
- Avoiding areas with a high risk of flooding
- Full access to the road network and provision for parking, turning and servicing on site
- Avoiding areas where there is the potential for noise and other disturbance
- Provision of utilities (running water, toilet, electricity, waste disposal, etc)
- Avoiding areas where there could be adverse impact on important features of the natural and historic environment and
- Sites which can be integrated into the landscape without harming the character of the area
- Promote peaceful and integrated co-existence between the site and the local community
- Avoid placing undue pressure on local services and facilities
- Reflect the extent to which traditional lifestyles whereby some travellers live and work from the same location thereby limiting many travel to work, thereby contributing to sustainability

Please give your views about site suitability below with reference to this list of criteria

ATTA KATE WISE LANE

What site are you responding to?
(e.g. G101) and are you the Contact Centre Staff?

Contact

Contact

Contact

What is the name of your representation?

Please set out the details of your objection or representation of support with reference to the criteria above.

SEE ATTACHED SHEETS.

Warwick District Local Plan

Gypsies and Travellers Sites

Options for Consultation

This objection is to the inclusion of site GT13 Kites Nest Lane, Beausale in the table of Options for Sites and Areas of Search in the consultation document, for the following reasons:-

1. Paragraph 8.4 of the consultation document says that only two sites were submitted for consideration in response to the call for sites launched in January 2013 and that they are included in the document for public consultation. One of them is site GT13. It is referred to in paragraph 8.4 within a section of the document headed 'Identification of Potential Sites'. However, the District Council has made it very clear that it is not a potential site and has spent considerable amounts of public money successfully defending appeals against an Enforcement Notice and refusal of planning permission, both of which were dismissed in September 2011, seeking compliance with the Enforcement Notice through the Courts and, most recently, defending an appeal against refusal of planning permission, the Secretary of State's decision on which is due later this year. Against this background, the inclusion of the site as a potential site is a gross error of judgement and it should be withdrawn from any further consideration.
2. In dismissing the appeals in September 2011 the Secretary of State agreed with his Inspector with regard to the main issues and also agreed with his conclusions. So far as this consultation exercise is concerned the salient points are:-
 - all parties agreed that there is substantial harm to the Green Belt's openness, and also that there is encroachment into the countryside (decision letter, paragraph 13);
 - the development would not protect either the character or the appearance of the attractive countryside and would also harm the visual amenity of the Green Belt. Landscaping could not overcome the resulting harm because of the constraints of the proposed layout and that the impact would be contrary to the principles of (the then extant) PPG2 and to the relevant SPG, and would be in clear breach of the relevant Local Plan and RSS policies and of the objectives of (the then extant) PPG7. In addition, the harm caused at the time of the public

Warrick Local Plan

Options for Sites

Options for Consultation

This objection is to the inclusion of the G.T. Sites West Lane, Beausite in the table of Options for Sites and Areas of Search in the consultation document for the following reasons:

1. Paragraph 8.4 of the consultation document says that only two sites were submitted for consideration in response to the call for sites launched in January 2013 and that they are included in the document for public consultation. One of these is site G.T.12. It is referred to in paragraph 8.4 within a section of the document headed 'Identification of Potential Sites'. However, the District Council has made a decision that it is not a potential site and has spent considerable amounts of public money successfully defending appeals against an Enforcement Notice and refusal of planning permission, both of which were dismissed in November 2011, seeking compliance with the Enforcement Notice through the Courts and, most recently, defending an appeal against refusal of planning permission, the Secretary of State's decision on which is due later this year. Against this background, the inclusion of the site as a potential site is a gross error of judgment and it should be withdrawn from any further consideration.

2. In dismissing the appeal in September 2011 the Secretary of State agreed with his Inspector with regard to the main issues and also agreed with his conclusions. So far as this consultation exercise is concerned the salient points are:

- all parties agreed that there is substantial harm to the Green Belt's openness and also that the development would be an inappropriate use of the land (decision letter, paragraph 14.1);
- the development would not protect either the character or the appearance of the wider countryside and would also harm the visual amenity of the Green Belt; landscaping could not overcome the resulting harm because of the constraints of the proposed layout and that the impact would be contrary to the principles of (the then extant) PPG2 and to the relevant NPPF and would be in clear breach of the relevant Local Plan and R22 policies and of the objectives of (the then extant) PPG2. In addition, the harm caused at the time of the public

inquiry was at a significant level and would be greater if the site were fully developed (paragraph 14);

- the harm identified was too substantial to be acceptable even for a limited period of time and this harm was not clearly outweighed by other considerations, and very special circumstances to justify the development, even on a temporary basis, did not exist (paragraph 31);
 - the site would dominate the local community (paragraph 16);
 - there is a strong likelihood that any transit or permanent sites found to be required will not be located in the Green Belt (paragraph 22).
3. The Inspector's report and the Secretary of State's decision letter could hardly have been more damning with regard to the suitability of the site as a gypsy and travellers site.
 4. More recently, on 1 July 2013, in a Written Ministerial Statement by the Local Government Minister, the Government made it clear that both temporary and permanent travellers sites are inappropriate development in the Green Belt, that planning decisions should protect Green Belt land from such inappropriate development and that the planning system for travellers sites aligned with that for settled housing. As is evident from the range of non-Green Belt options in the consultation document, there can be no justification for considering site GT13 to be a potential option, even had the District Council not needed to protect it over the past three and a quarter years.
 5. Aligning the planning system for travellers sites with that for settled housing indicates that both should be subject to same locational criteria. Both are residential development requiring the same access to schools, medical and community services, shopping and public transport services. RDS3 in the Revised Development Strategy sets out the criteria for the Council's Preferred Option for the broad location of development. The three relevant criteria are:-
 - concentrate growth within and on the edge of existing urban areas
 - protect the Green Belt from development where alternative non-Green Belt sites are suitable and available
 - avoid development in locations which could potentially lead to the coalescence of settlements.
 6. There is no good planning reason why one or more of the sites proposed in the RDS for housing or employment development cannot include provision for travellers within the range of uses to be provided. Such an approach would accord with the policy on promoting healthy communities at paragraph 69 of the NPPF. Paragraph 69 emphasises the important role the planning system

industry was at a significant level and would be greater if the site were fully developed (paragraph 17).

- * the harm identified was not essential to be acceptable even for a limited period of time and the harm was not clearly outweighed by other considerations, such as special circumstances to justify the development, even on a temporary basis, did not exist (paragraph 21).
- * the site would dominate the local community (paragraph 16).
- * there is a strong likelihood that any transit or permanent sites found to be required will not be located in the Green Belt (paragraph 22).

3. The Inspector's report and the Secretary of State's decision letter could hardly have been more damning with regard to the suitability of the site as a gypsy and traveller site.

4. After recently, on 1 July 2015, in a Written Ministerial Statement by the Local Government Minister, the Government made it clear that both temporary and permanent traveller sites are inappropriate development in the Green Belt. The planning decision should favour Green Belt land from such inappropriate development and that the planning system for traveller sites aligned with that for settled housing. As is evident from the range of non-Green Belt options in the consultation document, there can be no justification for considering site 1713 to be a potential option, even had the District Council not needed to consult it over the past three and a quarter years.

5. Aligning the planning system for traveller sites with that for settled housing indicates that both should be subject to same locational criteria. Both are residential development requiring the same access to schools, medical and community services, shopping and public transport services. RDS3 in the Revised Development Strategy sets out the criteria for the Council's Preferred Option for the broad location of development. The three relevant criteria are:

- * concentrate growth within and on the edge of existing urban areas
- * protect the Green Belt from development where alternative non-Green Belt sites are suitable and available
- * avoid development in locations which could potentially lead to the coalescence of settlements

6. There is no good planning reason why one or more of the sites proposed in the RDS for housing or employment development cannot include provision for travellers within the range of uses to be provided. Such an approach would accord with the policy on promoting healthy communities at paragraph 69 of the NPPF. Paragraph 69 emphasises the important role the planning system

can play in facilitating social interaction and creating healthy, inclusive communities.

7. The Revised Development Strategy also expresses, at paragraph 4.3.9, the District Council's intention to actively promote the regeneration of a number of employment sites in order to make the best use of the land for housing and employment uses. They are identified at paragraph 4.5.19 of the RDS. There is no evidence in the Gypsies and Travellers Options for Consultation document that these sites have been considered, nor reasons given for not including them as potential sites, nor why inclusion of provision within proposed settled housing sites has not been considered. Until and unless these potential sources of sites are considered the Options for Consultation document is flawed for lack of completeness.
8. In any event, site GT13 should be excluded from consideration for the reasons given in this objection.