



## Gypsy and Traveller Site Options Response Form 2013

For Official Use Only
Ref: 9847
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](http://www.warwickdc.gov.uk/newlocalplan)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		
First Name	W	
Last Name	WHITFIELD	
Job Title (where relevant)		
[Redacted Content]		
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?		
[Redacted Content]		

# 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)

GT08

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 LETTER

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## Part B - Commenting on the Gypsy and Traveller Site Options

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Do you have any other suggestions for land within this district that you think would be suitable for use as a Gypsy and Traveller site, bearing in mind the criteria for site identification? If so, please give the location and the land owner's details below:

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## Guidance on Making Representations

- Please use this response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)
- If you wish to make comments on more than one site, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing
- All forms should be received by **5.15pm on Monday 29 July 2013**
- 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 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 plan for Gypsy and Traveller sites and with consideration of planning applications in accordance with the Data Protection Act 1998
- To return this form, please drop off at one of the locations below, 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](mailto:newlocalplan@warwickdc.gov.uk)

## Where to see copies of the Gypsy and Traveller Site Options

Copies are available for inspection on the Council's web site at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan) and at the following locations:

Location	Opening Times
<b>Warwick District Council Offices</b> Riverside House, Milverton Hill, Royal Leamington Spa	Mon - Thurs 8.45am - 5.15pm Fri 8.45am - 4.45pm
<b>Leamington Town Hall</b> Parade, Royal Leamington Spa	Mon - Thurs 8.45am - 5.15pm Fri 8.45am - 4.45pm
<b>Warwickshire Direct Whitnash</b> Whitnash Library, Franklin Road, Whitnash	Mon - Tues 10.30am - 5.00pm Wed 1.30pm - 5.00pm Thurs Closed Fri 10.30am - 4.00pm Sat 10.30am - 1.30pm
<b>Leamington Spa Library</b> The Pump Rooms, Parade, Royal Leamington Spa	Mon - Weds 9.30am - 6.00pm Thurs 10.00am - 7.00pm Fri 9.30am - 6.00pm Sat 9.30am - 4.30pm Sun 12.00pm - 4.00pm
<b>Warwickshire Direct Warwick</b> Shire Hall, Market Square, Warwick	Mon - Thurs 8.00am - 5.30pm Fri 8.00am - 5.00pm Sat 9.00am - 4.00pm
<b>Warwickshire Direct Kenilworth</b> Kenilworth Library, Smalley Place, Kenilworth	Mon - Tues 9.00am - 5.30pm Wed 10.30am - 5.30pm Thurs - Fri 9.00am - 5.30pm Sat 9.00am - 1.00pm
<b>Warwickshire Direct Lillington</b> Lillington Library, Valley Road, Royal Leamington Spa	Mon 9.30am - 12.30pm & 1.30pm - 6.00pm Tues and Fri 9.30am - 12.30pm & 1.30pm - 5.30pm Weds Closed Thurs 9.30am - 12.30pm & 1.30pm - 7.00pm Sat 9.30am - 12.30pm
<b>Brunswick Healthy Living Centre</b> 98-100 Shrubland Street, Royal Leamington Spa	Mon - Fri 9.00am - 5.00pm
<b>Finham Community Library</b> Finham Green Rd, Finham, Coventry, CV3 6EP	Mon 1.00pm - 7.00pm Tues, Thurs and Fri 9.00am - 7.00pm Sat 9.00am - 4.00pm

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.

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

Dear Sirs,

**Gypsy and Traveller Site Options Response Form 2013  
Site GT08 Depot to West of Cubbington Hill Farm:**

We write to object to the proposal to locate a traveller's site on land described as to the west of Cubbington Hill Farm being proposal GT08 within the consultation document. The land is incorrectly named as it is to the west of Cubbington Heath Farm. We consider this to be misleading and the consultation should be started again on this site with the correct site name to ensure there is no confusion.

Notwithstanding this fact we make the following observations. The sites have been chosen without consultation of adjacent land owners. We have concerns of the impact of the site on what is open countryside and Green Belt land.

We note that the site will be considered along with others based on the list of criteria within the consultation document. We would make the following comments:

1. The site is remotely located on the busy A445 Leicester Lane. There is no footpath giving pedestrian access to Leamington or Cubbington. Pedestrian access to the site will therefore be dangerous. This will affect the ability of any travellers to obtain access to local services especially for children walking to and from school. There is no doctors surgery within Cubbington and no school spaces within the local schools. Any occupants of the site would have to travel some distance to utilise such facilities. The site is therefore not considered sustainable.
2. Access to the site is off a busy road with fast moving vehicles. The access to the site is near the brow of the hill and slow moving vehicles from the site may cause a hazard to other road users. The road is also proposed as a haul route for HS2 which will significantly increase the quantity of heavy goods vehicles using it for the duration of construction of HS2, some 10 years, especially as vehicles for the soil treatment / transfer

area will use it. This will make it dangerous for vehicles to access and egress the proposed traveller's site onto a busy road.

3. Utilities connected to the site are limited if none existent. Connecting utilities will be expensive. There is no foul drainage to site. Connecting to main sewers will be prohibitively expensive.
4. There is limited screening for the site and it will be extremely visible. There are currently no buildings on site. Any development will be clearly visible and inappropriate in the green belt / open countryside.
5. We understand that the site has also been infilled as well as used as an industrial depot. It was formerly a stone quarry site and the ground level has since been made up. It is highly likely that the site will be contaminated. Soil samples would be needed to confirm this. Assuming the site is contaminated, remediation costs will be high further making the site prohibitively expensive.
6. The site and also the adjacent land have a large badger population. Badgers are a protected species under the Wildlife and Countryside Act. Should the site be taken forward it will have an adverse effect on the wildlife on and surrounding the site. For this reason the site is not considered fit for the proposed use.

A number of the above points have been identified within your Warwick Local Plan Final Interim SA Report however the report does not cover all of the issues.

There are also additional criteria we feel should be taken into consideration in addition to your criteria contained within the National Guidance Planning Policy for Traveller sites March 2012 and National Planning Policy Framework when considering the suitability of sites as these would have to be considered if a formal planning application were submitted.

The National Guidance Planning Policy for Traveller sites March 2012 gives the following guidance to Local Authorities:

1. Local planning authorities should ensure that sites do not dominate the nearest settled community. This proposed location is rural countryside some distance from the boundary of Cubbington. The proposed site will be alien in the environment to the surrounding features. For this reason it should not be taken forwards
2. Green Belt: The National Guidance Planning Policy for Traveller sites March 2012 acknowledges travellers sites are inappropriate development in the Green Belt. This site s Green Belt. It further states that they should not be approved except in very special circumstances. No case has been made that there are exceptional circumstances therefore it should not be taken forwards.
3. Mixed residential and business sites: The National Guidance Planning Policy for Traveller sites March 2012 states regard should be had to sites suitable for mixed residential and business uses to allow residential accommodation and space for storage of equipment, however these should not be on a rural exception site. This would be a rural

exception site and therefore inappropriate for a mixed use. It further states that local planning authorities should not permit mixed use on rural exception sites. Your consultation document suggests all sites will be mixed used and again for this reason this is an inappropriate site for a traveller site.

4. Development in open countryside: The National Guidance Planning Policy for Traveller sites March 2012 states that local planning authorities should strictly limit new travellers site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. This site is in open countryside and therefore in contravention of this guidance. Again this shows this site is appropriate.

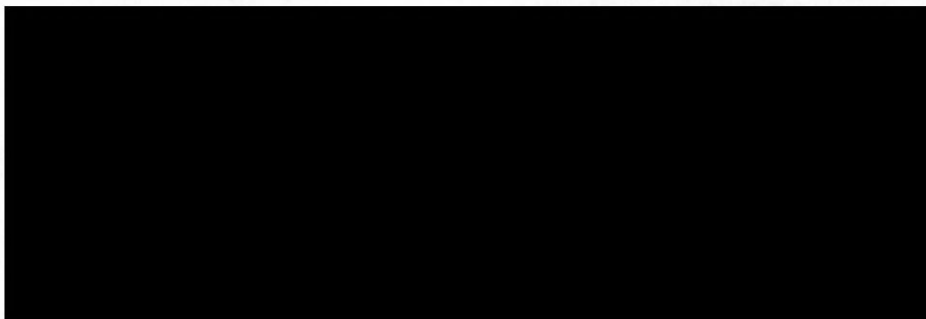
In addition National Planning Policy Framework offers guidance on development in the Green Belt. This proposed site is within the green belt and has been allocated as such by Warwick District Council. As such it is classed as important to prevent inappropriate development and urban sprawl. Inappropriate development should only be approved if there are exceptional circumstances. None have been outlined. No site should be approved within the green belt without justification that there are exceptional circumstances. It is hard to believe that there are no suitable brown field sites available within town boundaries as opposed to on green belt land. Unless it can be shown that there are no suitable brown field sites no sites should be taken forward within the green belt or open countryside. Again the site should not be put forward for this reason.

Whilst this site could be classed as brown field it remains within the green belt and green belt policies therefore apply. There are no permanent buildings on site. The conversion of the site would necessitate new buildings within the green belt which again is inappropriate development. Again this site should not be put forward

We would suggest that alternative sites are considered for traveller's sites where significant development is proposed. This type of development is much more suited to these areas. Planning permission is in process of being granted for the Coventry and Warwick Gateway Project the majority of which is within the boundary of Warwick District Council. Perhaps this is a location which could be looked at and compulsory powers used if necessary

For the above reasons we do not consider site GT008 is an appropriate site for a traveller and gypsy site and it should not be considered by the District Council as an appropriate site to take forward.

Yours faithfully



J. Whitfield

