

Dear Sirs,

Response to Warwick District Council's consultation on its Preferred Options for permanent sites for the accommodation of Gypsies and Travellers - GTalt03: Land at Henley Road/Hampton Road, Hampton on the Hill (Amber).

We formally lodge our objections to the classification of GTalt03 for the following reasons:

1. GREEN BELT and PREVIOUSLY UNDEVELOPED SITE

The site referenced as GTalt03 is identified as Green Belt in the Draft Local Plan. As such it has not been allocated for housing allocation nor is it within the boundaries of the village growth envelope for Hampton-on-the-Hill. Classification as Green Belt that has previously been undeveloped ought to be deemed as 'inappropriate development' for the purposes of accommodation of Gypsies and Travellers and the site classified as 'red'.

DCLG March 2012 'Planning policy for traveller sites' Policy E: Traveller sites in Green Belt states:

"Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development."

For the purposes of the planning process, the fact that the site is owned by persons identified as Gypsy/Traveller does not detract from the legal assumption that the classification of the site is 'inappropriate development'.

We note that WDC has stated that "(t)he Council does not intend to own or manage Gypsy & Traveller sites itself. Experience of other Local Authorities shows that the best way for sites to be provided and run are by Gypsies and Travellers purchasing and setting them up for themselves." Again, WDC's intention not to own or manage sites and its preference for sites to be provided and run by Gypsies and Travellers does not override the site's classification as Green Belt; such preferences/unofficial criteria are not contained in the Government's 'Planning policy for traveller sites' or the National Planning Policy Framework.

In addition, we note that:

a) the Gypsy and Traveller Accommodation Assessment (GTAA) for Warwick District, undertaken by Salford University in 2012, identified a need for 31 permanent pitches to be provided over a 15 year period, 25 within the first five years and in addition 6-8 transit pitches over the full 15 years; and

b) WDC has already identified sufficient 'green' sites to meet this identified need:

Site Reference	Capacity (potential no. pitches)	Recommended Maximum
GT04	15	10
GT12	15	8
GT15	5	5
GT19	5	5
GTalt01	15	10
GT02	15	10
GT05	15	10
GT12	8	8
TOTAL	93	66

2. Co-Existence with the Local Community

It has been suggested that GTalt03 has the capacity of 15 pitches and a recommended maximum of 15 pitches.

Bearing in mind that a pitch provides: *'accommodation for an individual family and consists of an area of hard-standing on which a park type home or permanent caravan, a touring caravan and associated vehicles can be located, together with a utility room for sole use of that household'*; and, assuming that a 'family' consists of 3/4 individuals (traditionally gypsy/traveller families are larger than average households - there is much reported evidence of this fact), WDC proposes that between 45- 60 individuals (this excludes visitors and/or transient gypsy/travellers on the site) can be accommodated by a village of approximately 200 individuals, predominantly retired and substantial numbers of elderly women (including 30 elderly women living alone).

Such a change to the local community, representing an increase in population of 25-30%, would be disproportionate and the site would dominate the local community.

The development of the 1.66ha site will substantially change the character of the area. Given the physical and aesthetic nature of the proposal and the fact that the site is highly and clearly visible from both the Henley Road and the Hampton Road - such a development will permanently and substantially change the characteristics of the village. The impact of the site would be exasperated by ground level being 1-2m higher than the Hampton Road; making the site eye level to people entering and leaving the village.

The site does not lend itself to the integration and inclusion of the gypsy/traveller into community.

3. Children

It is noted that WDC accepts that Budbrooke Primary School is full/close to capacity. The assumption that additional funding for a school extension/expansion will be obtainable is not substantiated and certainly not guaranteed. Furthermore, given the housing allocation in the draft Local Plan for housing development in Hampton Magna of 100 - 150 properties, it would be reasonable to assume that the new housing development will require anywhere between 100 - 300 additional school places (approximately 10 classrooms). Substantial investment will be required to accommodate educational requirements in the area.

In addition, we have concerns for the safety of children on the site as the site is surrounded on two sides by busy roads with a speed limit of 50mph on Henley Road and Hampton Road being derestricted (60mph). There is no play area close to the site and the DCLG (May 2008) Designing Gypsy and Traveller Sites Good Practice Guide positively discourages the placement of sites close to electricity pylons for H&S reasons.

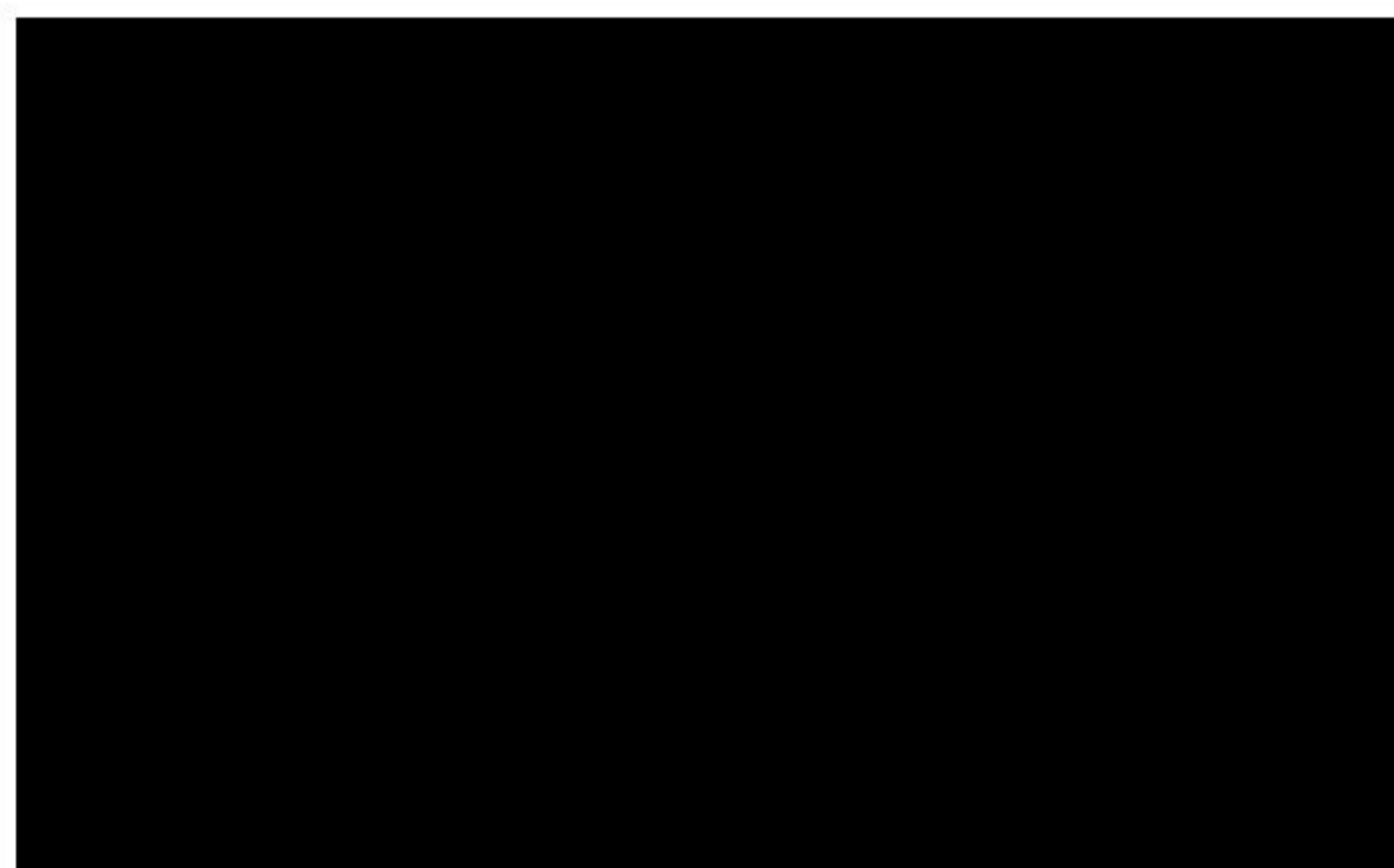
4. Access

Highways Safety has been recorded on two separate occasions as reasons for refusing planning on the site: once on appeal on 27 November 2009 by the Planning Inspectorate (APP/T3725/A/09/2107108) and on a separate application for planning on 17 December 2010 (W10/1221).

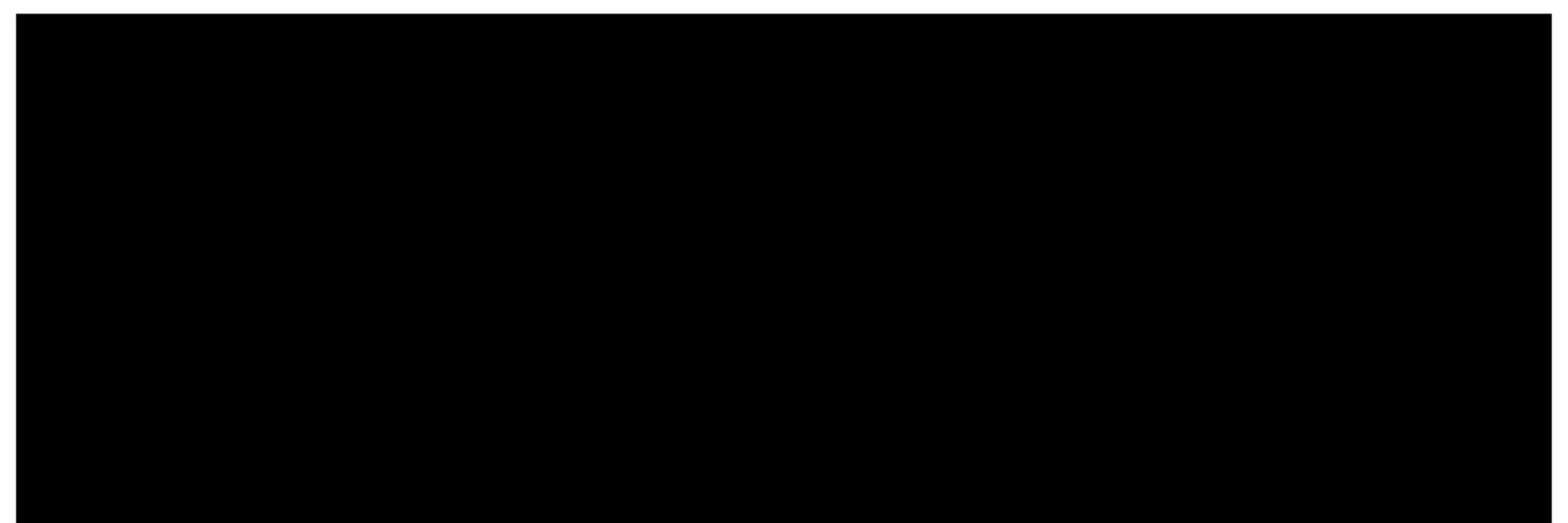
In both circumstances the refusal related to a single dwelling, not the current proposal for 15 pitches which could conceivably house a minimum of 30 adults (plus visitors and/or transient gypsy/travellers) owning anywhere between 15- 30 vehicles which it would be reasonable to assume would create an additional 30- 60 vehicle movements through any access road on a daily basis. This clearly poses a serious risk to both the occupants of the site and other road users.

We note that WDC has suggested that *“(a)ccess is achievable along the Hampton Road with the required visibility splays”*. Given the narrowness of the road, the ditch, the steep incline onto the site, the 60mph speed limit and the possible numbers of vehicle movements we would suggest that this is not a viable option and that WDC is not sufficiently considering Highways Safety in its proposal.

Yours faithfully,



Esther Kiddle



Julie Thomlinson