



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).**

I wish to formally lodge my objections to the inclusion of site GTalt03 in this consultation document as a possible site for Gypsies and Travellers for the following reasons:-

**1. General/ Context ... Comment on Warwick District Councils consultation on its Preferred Options for permanent sites for the accommodation of gypsies and Travellers.**

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Local authorities are duty bound to find traveller sites. However the process adopted by WDC to date seems to readily dismiss sites because they are previously/ currently allocated for other uses (residential or employment). Whilst these circumstances may bring practical implications/ conflicting expectations they should not be ruled out so quickly as the exercise should not be limited only to currently unallocated sites it should be integral to planning the area as a whole. This particular exercise seems to be 'bolted on' and seems to be looking for easy win unallocated sites.

**2. The site is in the GREEN BELT and previously UNDEVELOPED SITE**

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This site reference GTalt03 is identified as Green Belt. Hampton-on-the-Hill is not identified within either the adopted WDC Local Plan (2006) or within the draft 'Village Housing Options' consultation as a sustainable location for any new residential development. 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'.

Sites in the Green Belt should only be considered at all in policy terms if no other viable options are available and this does not appear to be the case.

The Governments own guidance issued in March 2012 re Traveller and Gypsy sites (accompanies the National Planning Policy Framework) confirms that in plan making and decision taking (re Traveller and Gypsy sites) **Local Authorities should specifically avoid inappropriate development in the Green Belt.**

**3. Impact on the Green Belt – The site referenced Gtalt03 resides in Green Belt on top on the Hill overlooking Warwick and Warwick Race Course**

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I would also like to reinforce this with the argument that the development would in actual fact as well as in policy terms be inappropriate as it would 'harm' the Green Belt by reducing the degree of 'openness'.

**Development of this site would be very prominent and visually intrusive.** The site is highly visible from all around the local countryside, standing on top of the hill with views of Warwick and the A46 Warwick by-pass main trunk road. The site which is not level but much undulated with steep slopes in parts, is highly visible from all aspects flanked on 2 of the 3 sides of the site by roads that are busy commuter and tourists routes used to access the historic town of Warwick, Warwick Castle and the Race Course. The visible impact of the site is further exasperated by the ground level being 1 – 2m higher than the Hampton Road; making the site eye level to people (walkers)/ vehicles entering and leaving the village.

Bearing in mind that the WDC is required to provide pitches that meet the government guidelines for the specific cultural and accommodation needs of the gypsy traveller community, this would mean that each pitch provides accommodation for an individual family (a family being at 3 / 4 individuals - traditional gypsy/traveller families have larger than average households –

there is much reported evidence of this fact) consisting of an area of hard-standing on which a park type home or permanent caravan, a touring caravan and associated vehicles, possibly livestock and machinery related to their work, together with a utility room for the sole use of that household and external lighting to ensure safe access at night as well as site lighting to ensure safe access and movement through the site for both pedestrians and vehicles.

All this would have characteristics which would be highly unsympathetic to the local rural environment and as such it would have a negative visual impact on the Green Belt and the approach to historic Warwick. The Gypsy and Traveller community with their very specific housing requirements would not harmonise with the Green Belt it would reside in, on top of a hill and it would be incongruous sited in alongside a small, rural (under 100 houses) old established Warwickshire village with some residents in Hampton-on-the-Hill being in such close proximity to the site that they would overlook the development from their homes.

#### **4. Access and Health and Safety - Hazards to families living alongside main roads**

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I would also like to reinforce this point, that there would be health and safety hazards to families living alongside 2 main roads (the Henley Road – 50mph and the Hampton Road – 60mph), together with issues of both traffic and noise transference through the walls of trailers and caravans as well as health and safety issues to other road users.

*The DCLG March 2012 'Planning policy for traveller sites' states:- 'When considering sites adjacent to main roads the government guidance is that careful regard must be given to "The health and safety of children and others who live on the site."*

One side of the site is directly next to the Henley Road - A4189 - 50Mph road used by commuters and tourists visiting Warwick. There are no street lighting columns. The second side of the site is directly next to the Hampton Road being derestricted (60mph) used by both the local community and others to access Warwick Parkway, Budbrooke School and the Birmingham Road. Both these roads are flanked by green belt and equally unsuitable for caravans due to access, visibility and speed at which cars travel on both these roads. There is also has no public footpath on the side of the site that butts up to the Hampton Road.

*The DCLG (2012) states there is greater noise transference through the walls of trailers and caravans than through conventional housing and the need to design measures for instance noise barriers to abate the impact on quality of life and health.*

In addition to noise from the main road (Henley and Hampton Road), noise from the M40 and the A46 Warwick Bypass is easily heard from the Village and it would therefore be unsuitable for caravans which are less well insulated than conventional housing. (Road noise levels are currently being investigated/ actioned by Budbrooke Local Council/ WDC due to ongoing complaints of excessive road noise from local villages in both Hampton Magna and Hampton on the Hill).

The main access to this site is off the Henley Road - 50 mph. There is currently no access to the site from the Hampton Road. The access to this site on the Henley Road - A4189 – 50mph is a busy main road. If the council decided to allow the access to be moved this would be just as treacherous for caravans to pull out onto a busy 50 mph+ road and when considers the increased numbers of people and their vehicle movements on and off the Henley Road it will greatly increase the highways safety issues for Gypsy and Traveller families as well as the wider community.

#### **5. Access and Health and Safety - Hazards of long vehicle combination lengths entering and exiting main roads**

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The main access to this site is off the Henley Road - 50 mph. There is currently no access to the site from the Hampton Road. The access to this site on the Henley Road - A4189 – 50mph is a busy main road. If the council decided to allow the access to be moved this would be just as treacherous for caravan and van combinations to pull out onto a busy 50 mph+ road and when considers the increased numbers of people and their vehicle movements on and off the Henley Road it will greatly increase the highways safety issues for Gypsy and Traveller families as well as the wider community

##### **Vehicle Combination Lengths**

It should be noted that and the average length of a Gypsy/ Traveller van and caravan combination is 15.24meters length and 2.5meters wide (Ford Transit with Hobby Caravan) this is almost the same maximum length as a HGV Truck and Trailer at 16.4meters length and 2.55Meters wide. As Gypsies generally travel in groups and it is not uncommon to see travellers waiting at the side of a road for their companions to enter exit a site. It would be a health and safety hazard if this were allowed to occur along either the Henley Road or Hampton Road due to the speed of traffic, width of roads and general undulating and poor visibility along these roads.

The Hampton Road is a narrow dangerous road. The site which stands high above the Hampton Road which is not level but very undulated with steep slopes in parts making it unsuitable for moving caravans or accessing from the Hampton Road being derestricted (60mph). The Hampton Road is used for buses which means that vehicles have to slow down to an almost stop to allow bus to pass. This road has also become a rat run with commuters using it to access Warwick Parkway Train Station Budbrooke School and the Birmingham Road in order to avoid the Bypass. The traffic calming measures have recently been removed from the Hampton Road making further hazards as vehicles speed up off the main Henley and maintain their speed up into the village. There is surface flooding along Hampton Road and along the edge of the site. In the winter the Hampton Road is subject to extensive flood water coming off the allotments and the local drains. This creates black ice making access treacherous to all vehicles. If the council decided to allow the access to be moved to the Hampton Road this would be even more treacherous than the Henley Road and greatly increase the highways safety issues for Gypsy and Traveller families as well as the wider community with caravans and vehicle movements on and off the site. Given the narrowness of Hampton Road, the ditch, the steep incline onto the site, the 60 mph speed the site does not lend itself to the integration and inclusion of the Gypsy/traveller into the Community.

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 was related to a single dwelling, not the current 15 pitches which could conceivably house a minimum of 30 adults (plus visitors and /or transient gypsy/travellers) owning anywhere between 15 – 30 cars, plus work vehicles and caravans, which it would reasonable to assume would create 30-60 vehicle movements through any access road on a daily basis. This very clearly poses a serious risk to both occupants of the site and the health and safety other road users.

The site does not lend itself to the integration and inclusion of the gypsy/traveller into the community and the interests of the settled community and that of the wider community must have their health and safety respected.

## **6. Size of Site and Co-Existence with the Local Community**

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It has been suggested that GTalt03 has the capacity for 15 pitches and a recommended maximum of 15 pitches and this does not take into account unauthorised use of the site by other Gypsy and Traveller families (there is much reported evidence and it is known that Gypsy and Travellers are in favour of controlled access to sites, for example using a lockable gate because it is their experience other Travellers may seek to access and stay on a site un-authorized).

Bearing in mind that the WDC is required to provide pitches that meet the government guidelines for the specific cultural and accommodation needs of the gypsy traveller community, this would mean that each pitch provides accommodation for an individual family (a family being at 3 / 4 individuals - traditional gypsy/traveller families have larger than average households – there is much reported evidence of this fact) consisting of an area of hard-standing on which a park type home or permanent caravan, a touring caravan and associated vehicles, possibly livestock and machinery related to their work, together with a utility room for the sole use of that household and external lighting to ensure safe access at night as well as site lighting to ensure safe access and movement through the site for both pedestrians and vehicles.

The prospect of fifteen pitches would mean that the WDC proposes that between 45 – 60 individuals (this excludes visitors and /or transient gypsy/travellers on the site) be accommodated in a village of approximately 200 individuals, many of whom are retired including 30 single people living alone. Such a change to the local community, representing an increase in the population of 25 – 30%, would be disproportionate, cause much unrest within the village of Hampton-on-the-Hill and the site would dominate the local community which would give an imbalance to the settled community in the Village.

The site does not lend itself to the integration and inclusion of the gypsy/traveller into the community and the interests of the settled community and that of the wider community must have their human rights respected.

As the WDC has already identified sufficient 'green sites' to meet the identified need, and the Governments own guidance issued in March 2012 re Traveller and Gypsy sites confirms that in plan making and decision taking (re Traveller and Gypsy sites) Local Authorities should specifically avoid inappropriate development in the Green Belt the site referenced as GTalt03 ought to be deemed as 'inappropriate development' for the purposes of accommodation of Gypsies and Travellers and the site classified as 'red'.

Yours faithfully

