

## Gypsy and Traveller Stratford Road Preferred Options Site Response

For Official Use Only

Ref:

Rep. Ref.

2014

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

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) or by letter (address on back page)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	Miss	
First Name	Alison	
Last Name	Potter	
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 consultations on Gypsy Traveller sites?

Yes

No

About You: Gender	
Ethnic Origin	
Age	

Where did you hear about this consultation e.g. radio, newspaper, word of mouth, drop-in sessions.

Residents Association Newsletter

## Part B - Commenting on the Stratford Road Gypsy and Traveller Preferred Site

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:

- a) the site is within reasonable distance of schools, GP surgeries, dentists, hospitals, shops and community facilities;
- b) the site has good access to the major road network;
- c) the site is of a suitable size to accommodate between 5 and 15 pitches for permanent sites or 12 pitches for transit sites;
- d) it can be demonstrated that infrastructure requirements can be adequately met;  
and
- e) there is potential for the site to be adequately screened.

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.

We are local residents of Chase Meadow and we **strongly oppose** the site on Stratford Road; the site fails to conform to the suitability criteria provided by Warwick District Council (WDC) and in line with Government Guidance for Gypsy & Traveller sites. Therefore the Planning Officer must refuse the application accordingly.

WDC have issued 19 suitability criteria by which to determine the proposed Stratford Road site. Our objections to the site suitability in relation to the relevant criteria are as follows...

### 18. Availability

In relation to this criterion the consultation pack issued by WDC simply states 'available'. We assume this relates to whether or not the land at Stratford Road is currently available for sale to or use by an appropriate developer. WDC say that the land is available but they provide no detail as to how this land has become available.

We understand that the land between Severn Trent and the M40 is owned by various people including Severn Trent, private land owners and private dwellings. As far as we are aware Severn Trent and some of the private land owners are opposed to the scheme and therefore the land is not currently available, despite what WDC would have us believe. Until WDC can prove that this land is available to site a permanent Gypsy & Traveller site, then the planning application should not be granted.

It is possible that WDC may be considering a Compulsory Purchase Order (CPO) of the site if the land owners are not supportive of the proposal. However, as the planning office will be aware CPOs take many years to go through, especially if they are appealed at the High Court, and so we would question whether or not the Stratford Road site is suitable to deliver WDC's requirement for Gypsy and Traveller Sites within the 5 year timescale.

### 15. Access Issues

The consultation pack states 'Advice expected from WCC soon'. As we have no sight of any advice from WCC we will consider what the access impact will be from our own point of view.

During a drop-in session with WDC they outlined two access routes to the proposed Gypsy & Traveller site. The first was via a lane owned by Severn Trent; we have since been informed by Severn Trent that they will not allow access to this lane. Consequently access to the site will be through Longbridge Village.

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Access through Longbridge Village is currently completely unsuitable for Gypsy & Travellers. The lane that comes off the A429 into Longbridge is located on a sharp bend with very poor visibility. I recently drove along the A429 towards the M40 at approx. 9pm on a foggy Saturday evening and visibility was so poor I could barely see in front of my own headlights. This bend is also prone to flooding in heavy rain and becomes a skid risk in ice or snow. The fact that this bend is also home to a traffic junction makes it an accident black-spot. At present the number of residents living in Longbridge Village is low, however with 15 Gypsy & Traveller families using this junction for access, the volume of traffic turning off the A429 will increase significantly creating a further risk for traffic accidents.

In addition the guidance on Gypsy & Travellers published by the Government suggests that they need access for long, slow moving vehicles as they will be towing caravans and static homes along this access route. Currently the lane through Longbridge Village is a narrow farm track not wide enough to accommodate these vehicles. Furthermore, slow-moving long vehicles turning off the A429 will significantly increase the risk of traffic accidents in normal driving conditions, and will be extremely hazardous, potentially fatal, in poor driving conditions.

We understand that if the chosen access route is via Longbridge Village WDC will have to spend money on improving access to ensure the route is suitable for the needs of the Gypsy & Traveller communities. A significant financial investment will be needed from WDC to make this traffic junction fit for purpose and safe for all road users. Bearing in mind that this resource will come from tax payer's money we would question whether this is the best use of tax payer's money, or whether a more suitable site can be found within the district which already has appropriate access routes for the population in question?

#### **11. Is the site close to other residential properties?**

There are residential properties located very close to the proposed site, with the closest just 37 meters away. Government Guidance on Gypsy and Traveller sites advises that the maximum pitch capacity is 15 and that the Gypsy and Traveller site should not overpower or dominate any existing residential area.

The proposed site on Stratford Road comprises 15 pitches so is at the highest recommend capacity. Each pitch will comprise a static home as well as a space for a mobile caravan and it is recommended that they have expansion space so that as families reproduce and grow, they can continue to reside together on the same site. It is reasonable to assume that each pitch will have between 5-10 residents and therefore the population located at this site will be between 75-150 people. Furthermore they may have visitors to their site at any given time.

Longbridge Village is a small hamlet with a modest population. Clearly the addition of up to 150 Gypsies & Travellers in close proximity to Longbridge Village will dominate the existing community there and alter the residential conditions the village currently enjoys. We would ask the planning officer to be mindful of the existing residents when making their decision as we believe the site is unsuitable due to its proximity to Longbridge Village.

WDC have a responsibility to provide 31 pitches over 15 years. Despite identifying 3 preferred sites across the district, the Stratford Road proposal is set to accommodate 48% of the whole requirement. Furthermore there are areas within the District Council, such as Kenilworth, which are not being proposed to house any Gypsy & Traveller sites. In order not to dominate existing communities we would question why the council do not spread their pitch allocation more evenly across their area, resulting in a larger number of small pitch sites, thereby reducing any extra demand on local resources.

#### **1. Landscape Character**

WDC have a duty to meet the accommodation needs of the population within their area, including Gypsy and Travellers. We believe that the chosen site at Stratford Road is unsuitable for the Gypsy and Traveller population as it does not provide a reasonable standard of living.

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The site is bordered by a sewage works, the River Avon and the M40 motorway, each of which provide health or safety risks to the Gypsy & Traveller population. There is currently a 'cordon sanitaire' in place which will need to be reduced according to WDC's plans. Whilst they may legally be able to build pitches close to the sewage works the council also have an ethical/moral responsibility to their resident populations. We currently live in Chase Meadow (much further from the sewage works) and it is not uncommon for us to smell sewerage, particularly during the summer months. We can only imagine how strong this smell (and potentially taste) will be in close proximity to the site; therefore we don't believe that it is a suitable site to create residential accommodation.

To the north is the M40 motorway. The council have confirmed that a noise report has been carried out which concluded that the noise is within the acceptable limits, however they don't consider the impact of the M40 on air quality. A report published by MPs highlighted in today's national news (8<sup>th</sup> December 2014) states that air pollution now causes 29,000 deaths annually in the UK, which is nearly as many as caused by smoking. The report highlighted that amenities should be built far away from major roads and that action must be taken to stop a new generation of children being exposed to poor air quality. If the site at Stratford Road goes ahead there will be a number of children living at these permanent pitches that will be exposed on a daily basis to poor air quality. Again we would reiterate that WDC have a moral responsibility to provide a good standard of living for Gypsies & Travellers and that the health risks of the chosen site prevent this site from being suitable.

Finally the location of River Avon, just 20 metres from the site, provides a safety risk to the children that will live at these permanent pitches and also a flood risk to the site in general. WDC do commit to providing a flood alleviation scheme as well as landscaping which will buffer residents from the sewage works, M40 and the River Avon but this will be at significant cost, again at tax payers expense. Even with these buffers in place we still believe that the site on Stratford Road will not provide an acceptable standard of living for residents, for health and safety reasons, and therefore the site is completely unsuitable.

### **13. Distance to GP Surgeries, Schools etc**

The closest amenities to the proposed site on Stratford Road are at Chase Meadow and Aylesford. There is already intense pressure on local schools due to the large housing developments in Warwick over the last 20 years. Gypsy/Travellers place extra demands on school places, and the Council must consider the capacity of existing school premises and resources to cope with this. We were told by a council representative at a drop-in session that there is talk of building a new Primary School close to Aylesford School. As far as we know this proposal is in the very early stages, and will take years to plan and build, so should not be relied upon for the purpose of this planning decision. The council must be sure that existing services have the capacity to meet the needs of this proposed Gypsy & Traveller population before approving this planning application. There will also be additional demands placed on the NHS by the creation of a permanent Gypsy/Traveller site on Stratford Road, and again capacity of local services must be considered.

### **19. Deliverability**

A key consideration for the deliverability of this scheme is viability. Throughout this letter we have highlighted that the current state of the proposed site is completely unsuitable for the purpose for which it is intended. This means that WDC will have to spend a significant amount of money on creating appropriate access, landscaping, flood alleviation, safety measures and noise reduction. This is all in addition to the money needed to develop the site itself.

WDC state in their consultation pack that they are committed to allocating sustainable and affordable sites for the permanent residential needs of its Gypsy and Traveller Community. This planning application must fall at the first hurdle because this site is in no way affordable, and therefore does not meet the council's own criteria. WDC has a duty to use tax-payers money in a fair and proper way and the construction of this site using tax-payers money is clearly contrary to that duty. There must be other sites within the district that are more suitable, and require less investment from the council, so why are the council intent on using this site?

Continued...

The fact that WDC have not confirmed exactly how the land in question is 'available' raises serious concerns for deliverability within the proposed timescales. Severn Trent have confirmed, as have certain private land owners, that they will not be selling their land to the council. If the site goes to CPO this could take years to get a decision through the courts. Even once the land is secured the alterations and works mentioned above to improve access, safety and suitability could take months or even years. From the information given to us in the consultation pack we can only assume that this site will not be deliverable within 5 years, as per the councils Local Plan, therefore it is a completely unsuitable choice of site, and planning approval should be refused.

### **Council Obligations**

We understand that the council is required, by nation planning policy and the Housing Act 2014 to meet the needs of the populations within their area, including Gypsy/Travellers, however within their powers WDC also have the discretion to listen to their local communities and act in their best interests.

The Localism Act (2011) basically allows local authorities the final say on local development decisions through a 'general power of competence', regardless of pre-set national targets. The Localism Act also gives new rights and powers for communities to affect decisions within their local area. There are a numerous cases in recent years where local community groups have successfully managed to oppose permanent Gypsy/Traveller sites close to their homes, including in Meriden (RAID) and Solihull. This sets a precedent, and along with the Localism Act gives WDC the freedom to respect the wishes of the Chase Meadow Community.

We would therefore urge Warwick District Council to take note of the opposition to their plans (a detailed response is currently being organised by Chase Meadow Residents Association).

### **Employment/Commercial Land**

This consultation also covers land for employment space on the A429 Stratford. As there are already empty commercial units at Tournament Fields, as well significant amounts of undeveloped land assigned for commercial development, surely it makes more sense to use this area to capacity before assigning more land for employment purposes. Furthermore, the M40 roundabout is already very congested, especially when there are events or traffic issues in the surrounding area, and cannot cope with additional commuter traffic.

### **Summary**

To summarise, the proposed site at Stratford is currently completely unsuitable for a permanent Gypsy & Traveller population. It is unsuitable because the land is unavailable, the access routes are poor and the surrounding roads/rivers/sewage make the site inappropriate for residential accommodation. A **significant** investment over a number of years will be required from WDC to make this site suitable and therefore the site is not an affordable or viable option, nor is it deliverable within the councils required timetable. Even if these issues were not present then the planning application should still be refused as the site is too overpowering for the existing residents of Longbridge Village and will place a drain on local community resources which are already overstretched. The Stratford Road site does not meet the 19 Suitability Criteria issued by WDC, and will not in the immediate future and therefore planning approval **must be refused**.

We trust our comments will be taken into consideration and we urge the Planning Officer to refuse planning permission for this scheme on the basis that it is an unsuitable site which does not meet the relevant criteria set out for choosing a permanent Gypsy & Traveller site.

## 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, alternatively complete online at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)
- 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 **4.45pm on Friday 12 December 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 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 Stratford Road Gypsy and Traveller Preferred Options Site

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 – 8.45am – 5.15pm Thurs Fri 8.45am – 4.45pm
<b>Leamington Town Hall</b> Parade, Royal Leamington Spa	Mon – 8.45am – 5.15pm Thurs 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 – 9.00am – 5.30pm Tues Wed 10.30am – 5.30pm Thurs – 9.00am – 5.30pm Fri 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 9.30am – 12.30pm & 1.30pm – 5.30pm Fri 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

**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.**