

Gypsy and Traveller Stratford Road Preferred Options Site Response Form 2014

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Ref:

Rep. Ref.

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 or by letter (address on back page)

Part A - Personal Details

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

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.

Objection to the proposed Gypsy / Travellers site - 'Site B' – Stratford Road, Warwick – Part 1

The recent proposal for 'Gypsies & Travellers - Preferred Options for Sites' dated 13th August 2014 came as a complete shock to me and many of my fellow residents. I assumed our council had spent a considerable amount of time, effort and money preparing a plan identifying suitable sites for these minority groups and after publishing their preferred options those plans were now ready for submission to government, but apparently not.

How can it be that the document 'Gypsies and Travellers Sites - Options for Consultation - APPENDIX 2' and APPENDIX 1 the 'Report on the outcomes of Public Consultation Options 2013', which proposed twenty sites (GT01 – GT20) and twenty three alternatives (GTalt01 – Gtalt23) respectively, make absolutely no reference to a site on the Stratford Road Warwick which now appears in the proposed submission to government reference Appendix 2 'Warwick District Local Plan - Sites for Gypsies and Travellers - 2011-2029 - Publication Draft'? What happened to the initial list of five preferred sites also listed in this document ie. GT04, GT12, GT15, GT19 and GTalt01 plus the alternative sites considered ie. GT02, GT05, GTalt12, GT06, GT08, GT11, GTalt02 and GTalt03?

The three proposed sites now contain one, Site A, which is dependent on Leamington Football Club finding an alternative home and two, Site B, which fails to meet much of the criteria set out in 'Gypsy & Traveller's Sites: - Appendix 2. - 7. Local Plan Requirements: - 7.3 Preferred Options & 7.4 national guidance' – see below.

- **Access to GP surgery, school and public transport:** The surgery on Chase Meadow is already over stretched, try getting an appointment, as I sometimes have to, and you'll soon see how difficult that is. The local schools are also running near to capacity and the continued development on Chase & Beaumont Meadows can only make matters worse for

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- both organisations. Public transport isn't an issue though as buses do use the Stratford road on a regular basis, but public transport is far from cheap these days.
- **Avoiding areas with a high risk of flooding:** The vast majority of 'Site B' highlighted on your map is in a flood Zone 3 (environment agency map reference X:427,050;Y:262,481) and the areas highlighted as Zone 2 are, as you are aware, considered to be Zone 3 for planning and development purposes (England only). Also, I understand the creation of 'hard standing' on property can have a direct link to the risk of flooding and since October 2008 planning permission may be required before it can be installed. Surely the 'hard standing' required for Gypsy & Travellers homes would add to the flood risk.
- **Safe access to road network:** The A429 Stratford Road is the main artery from the M40 to Warwick Castle and Warwick Town centre. The on-going housing and employment developments on Chase Meadow, Beaumont Meadow and Tournament Fields make this road one of the busiest in the local area already. The proposed location for the Gypsy & Travellers site is in an extremely dangerous position being adjacent to a sharp bend and existing or proposed entrances to residential sites (Earls Meadow, Longbridge Manor) and Tournament Fields. The Severn Trent and WDC sites also add to the problem. In addition a national cycle route (No.41) is accommodated on the cycle way running along this part of the Stratford Road.
- **Avoiding areas where there is the potential for noise and other disturbance:** The proposed site is very close to the busy M40, Stratford Road and WDC site. I often meet refuse trucks leaving the depot at 6.40am so noise has to be an issue on 'Site B'. Surely, the M40 alone is reason enough for this criteria not being met?
- **Provision of utilities:** I would assume that the provision of the necessary utilities isn't an issue.
- **Avoiding areas where there could be adverse impact on important features of the natural and historic environment:** see point below.
- **Sites which can be integrated into the landscape without harming the character of the area:**
Tens of thousands of visitors come to Warwick every year to visit not just the amazing Castle but to enjoy the historic beauty of much of the town centre and the parkland adjacent to the river. The first impression those people will get of our beautiful town will be a gypsy encampment, especially the many thousands that travel by coach and have an elevated seating position - how awful.

Site development will accord with national guidance on site design and facility provision."

To fully accord with the provisions of 'Planning Policy for Traveller Sites', additional criteria need to be incorporated so that the policy:'

- **Promotes peaceful and integrated co-existence between the site and the local community:**

The reality is that this won't happen. The local population on Chase & Beaumont Meadows have very recent experience (two weeks at Easter) of Gypsies overrunning Tapping Way causing misery and leaving a quite disgusting amount of mess.

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The council workers who cleaned up after them deserve a huge 'pat on the back' as clearing up human excrement isn't very pleasant. My wife and I were prevented from going about our daily exercise routine as we were chased by the Gypsy's dogs and no attempt was made to prevent this. What evidence is there that suggests that the Gypsies have any intention of integrating in the community?

- **Avoids placing undue pressure on local infrastructure and services:**

There is absolutely no way the proposal can avoid placing undue pressure on the local infrastructure and services which I have demonstrated above.

The objections raised in 'GT11 in 'APPENDIX 1 - Item 10 / Pages 14 & 15 - Report on the outcomes of Public Consultation Options 2013' apply equally, if not more so, to the proposed 'Site B' and are included in my objection.

Objection to the proposed Gypsy / Travellers site - 'Site B' – Stratford Road, Warwick – Part 2

Following the publication of the document 'Warwick District Council October 2014 Sites for Gypsies and Travellers Preferred Options Consultation Land at Stratford Road, Warwick', which identifies the exact location of the proposed Gypsy & Travellers site, I'm amazed that this site can be considered suitable, for a number of reasons.

Your document makes reference to the 'National Planning Policy Framework (NPPF) 2012'. NPPF states that the framework "should be read in conjunction with the Government's Planning Policy for Traveller Sites" (GPPTS). This policy document was published in March 2012 to accompany the NPPF. This sets out the government's aims in respect of Traveller sites. The Stratford Road site fails to meet the criteria set out in the GPPTS in a number of ways.

Firstly, the document states that Gypsy/Travellers sites should not be located on sites in areas of high flooding risk:-

'Where there is a risk from flooding the degree of risk must be determined prior to considering allocation or development of a site by reference to Planning Policy Statement 25: Development and Flood Risk (PPS25), the Environment Agency's Flood Map and the local planning authority's Strategic Flood Risk Assessment. Annex D of PPS25 sets out a risk based sequential approach to be applied at all stages of the planning process. A Sequential Test is to steer new development to areas at the lowest probability of flooding. Table D.1 of that annex specifies three flood zones of low, medium and high probability. PPS25 table D.2 makes it clear that caravan sites for permanent residence are considered "highly vulnerable" and should not be permitted in areas where there is a high probability that flooding will occur (Zone 3 areas).'

Also, 'A key consideration is that residents can safely evacuate the site in response to flood warnings and that emergency services would be able to reach the site to ensure residents' safety.

The statement in the October 2014 document that 'the threat is from the brook which does not flood' is highly contradictory. If the threat is from a brook that does not flood then there is no threat.

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Yet, the proposed site being only 20m from the river Avon, not just a small brook, on land designated as Zone 3 (reference the Environmental Agencies website 17th November 2014) their highest risk level, must have a huge potential to flood. Your claim that the threat can be eradicated I believe is misleading and surely can only apply to the brook and not the much bigger threat from the river Avon. So how can this site ever be considered suitable?

Secondly, GPPTS also states that 'It is essential to ensure that the location of a site will provide a safe environment for the residents' especially children. This site is adjacent to a river, close to a motorway and near one of the busiest roads leading to and from Warwick. Then there's the sewage work and the elusive cordon sanitaire. How is all that considered safe?

Thirdly, 'sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings'. If Taylor Wimpey, Bovis or Bellway, who are all building in the vicinity, applied to build ordinary residential dwellings on the proposed Gypsy/Traveller site would the local planning office grant permission? Also, could any potential purchaser get house insurance in that location?

Fourthly, GPPTS also states that 'Caution should be used when seeking locations for sites to ensure that they are based on need in a particular area and not the availability of inappropriate land for alternative uses. Traditionally, Gypsy sites have been located on land which is inappropriate for alternative uses and this, in itself, has caused problems both for the Gypsy community and for Site Managers.' Surely the proposed Stratford Road site falls under the inappropriate land category.

Finally, the document 'Gypsies & Travellers - Preferred Options for Sites' dated 13th August 2014 seems to me very underhand and contrary to the interest of Warwick and its residents. How can you justify the two years of work which lead to numerous public meeting, which many of us made time and effort to attend, where we had the opportunity to express our views and then make a recommendation which isn't based on your findings. Are we now going to be given a chance to speak at a public meeting where you can explain the benefits to our community of your proposal? Or is it a done deal?

We're fortunate to live and work in one of the best areas in the country. Warwick is a beautiful town enjoyed by thousands of visitors every year, bringing a huge amount of revenue to local businesses and to the council. The residents pay considerable amounts in house prices and council tax for that privilege too. We're proud of our town and will do everything in our power to protect it despite the government efforts to the contrary. Surely, there is a less invasive, less intrusive option to the government mandate of Gypsy & Travellers sites. I would hope that the local elected councillors are doing their utmost to prevent the option at 'Site B' – Stratford Road, because if not they obviously don't understand the threat to the 'jewel in the crown' which is Warwick.

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
- 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 and at the following locations:

Location	Opening Times
Warwick District Council Offices Riverside House, Milverton Hill, Royal Leamington Spa	Mon – 8.45am – 5.15pm Thurs Fri 8.45am – 4.45pm
Leamington Town Hall Parade, Royal Leamington Spa	Mon – 8.45am – 5.15pm Thurs Fri 8.45am – 4.45pm
Warwickshire Direct Whitnash 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
Leamington Spa Library 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
Warwickshire Direct Warwick Shire Hall, Market Square, Warwick	Mon – Thurs 8.00am – 5.30pm Fri 8.00am – 5.00pm Sat 9.00am – 4.00pm
Warwickshire Direct Kenilworth 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
Warwickshire Direct Lillington 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
Brunswick Healthy Living Centre 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.