



TOWN AND  
COUNTRY  
PLANNING  
DEVELOPMENT  
CONSULTANTS

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Our Ref: CJD.LPC.2364

Mr. P. Conroy  
Spatial Planning Team  
South Gloucestershire Council  
The Council Offices  
Castle Street  
Thronbury  
South Gloucestershire  
BS35 1HF

Dear Mr. Conroy

**Consultation Response – Gypsy and Traveller Sites  
Draft Development Plan Document for Consultation  
“Towards Preferred Options”**

**Site: Homefield, Hall End, Wickwar, South Gloucestershire, GL12 8PD  
Proposal: Allocation of Site for 5 Residential Pitches**

LPC Ltd have been engaged by the Hall End Residents Association to submit a representation on their behalf in respect of the above Gypsy and Traveller Sites Draft Development Plan Document for Consultation “Towards Preferred Options”. This representation specifically relates to the site at Homefield, Hall End, Wickwar which it is suggested can accommodate 5 residential pitches.

This representation makes a strong **OBJECTION** to the suggested allocation of this site on the following grounds.

- This site has an extensive planning history whereby the Council has since 2003 pursued rigorous enforcement action to secure the removal of unauthorised residential development. Two Planning Appeals have recently been determined in respect of proposed residential development (stationing of a caravan) with the Inspector agreeing with the Council in each case that such a form of development would be totally unacceptable in this isolated rural location. In particular the Appeal decisions highlighted the harm that would occur to the landscape quality of the locality as a result of the stationing of caravans. The enforcement action cumulated in a High Court Order granted in the summer of this year to remove the unauthorised caravans (and associated works) and return the land to agricultural use. Given this rigorous action by the Council in the past to prevent inappropriate unauthorised development it is very difficult to understand the rationale for proposing this site as a Gypsy and Traveller Site for the scale indicated (5 residential pitches). Any alleged

LPC (Trull) Ltd  
Trull = Tetbury  
Gloucestershire  
GL8 8SQ  
Tel: 01285 841433  
Fax: 01285 841489

benefits of providing such facilities are far outweighed by the site specific problems that would arise.

- You will no doubt be aware that this site is the subject of a current planning application which seeks permission for 5 gypsy and caravan pitches. (Application Ref: PK08/2703/F). We have recently made a detailed Objection to this planning application. A copy is enclosed for your attention since the contents set out in detail the planning harm that will result from the use of this site for 5 residential pitches. The concerns set out equally apply to the DPD Consultation. Essentially the concerns are:
  - *The unsustainable nature of the site for the scale of development proposed.* I would add that the inappropriate nature of the site on Sustainability Grounds is highlighted in the Consultation Draft – Sustainability Appraisal Report. This clearly identifies that the site is totally car dependent and not within walking / cycling distance of employment, shops and services. This is contrary to the contents of the recently published “*Designing Gypsy and Traveller Sites*” Good Practice Guide which offers relevant guidance on the selection of permanent sites in Chapter 3. Relevant extracts state as follows:
    - 3.1 *Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any other form of housing poorly located sites, with no easy access to major road or public transport services, will have a detrimental effect on the ability of residents to:*
      - *Seek of retain employment*
      - *Attend school, further education or training*
      - *Obtain access to health services and shopping facilities.*
    - 3.2 *Easy access to local services, and to social contact with other residents in the community, should help deal with the myths and stereotypes which can cause community tension and instead encourage a greater sense of community with shared interests.*
    - 3.4 *Circular 01/2006 “Planning for Gypsy and Traveller Caravan Sites provides advice on site location and selection. It identifies factors which are important for the sustainability of a site, for instance:*
      - *Means of access, availability of transport modes and distances from services*

- *Promotion of integrated co-existence between the site and local community*
- *Easy access to General Practitioner and other health services*
- *Near to bus route, shops and schools*

3.6 *Sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings.*

- *The harmful effect on highway safety.* As set out in the planning application representation a suitable access will be required to serve the scale of development proposed. This new access will have to be created onto Hall End. There is insufficient land within the landowners control to provide this access to an appropriate standard.
- *The harmful effect on the landscape character of the locality.* This is an issue that was given high regard by an Inspector on a recent Appeal relating to the site (for a scheme that was more modest in scale than the 5 residential pitches now proposed). The scale of development proposed will result in a significant visual intrusion to the quiet, tranquil landscape characteristics of the present locality.
- Given the isolated nature of the site no mains drainage will be available to serve the scheme. It is therefore essential that before any decision is made to allocate this site that a detailed analysis of the drainage implications are undertaken to ensure that such facilities will be available to serve the development in a satisfactory manner. (This is an important technical matter which has been quite rightly raised by the Council during the assessment of the planning application. Despite a reasonable request from the Council for the submission of this information by 4<sup>th</sup> November the applicant has failed to submit any information to address this important matter.)
- The site is in an archaeologically sensitive area (again as recognised in the Consultation Draft – Sustainability Appraisal Report). The Scheduled Ancient Monument of Wickwar Small Roman Town is located to the north and a known Roman road runs along the eastern site boundary. Therefore, before any decision is made on the appropriateness of the site a full Archaeological Evaluation should be undertaken with the findings fully assessed.
- The site is in close proximity to a mainline railway which is located approximately 80 metres to the east of the site. Given the close proximity and potential for noise disturbance it is appropriate to consider whether the future occupiers of the site will suffer noise disturbance from the railway. PPG24 "Planning and Noise" sets out

the various Noise Exposure Categories for Dwellings. Without the submission of a Noise Assessment evaluating the noise implications of the railway track the Council are unable to consider whether the site falls within Noise Category A (where noise should not prevent the grant of planning permission) or it falls within Noise Categories B – D where mitigation measures are required or permission should be refused. Such a Noise Assessment must be submitted and evaluated prior to a decision being made on whether to allocate this site.

In conclusion the above factors are robust reasons why this site should not be carried forward as part of the DPD process, with any alleged benefit about the Need for Gypsy and Traveller Sites being far outweighed by the site specific constraints of this site.

Yours sincerely



Chris Dance  
Associate

cc Hall End Residents Action Group