

18 August 2020

Dear Sirs

REF: Planning Application 20/01747/F: Land South Side Of Widnell Lane Piddington: Change of Use of land to a 6no pitch Gypsy and Traveller site to include 6no mobiles, 6no tourers and associated operational development including hardstanding and fencing.

I have carefully read the above application which should be considered in conjunction with (i) a current application 20/01122/F, and two **refused** applications (ii) 17/001145/F and (iii) 17/01962/F.

Please note that **TWO** similar applications have been **REFUSED** by Cherwell (17/001145/F, and 17/01962/F) and the smaller development of 6 pitches only scraped through on appeal **if certain strict conditions were met by the applicant** (see APP/C3105/W/18/3209349) none of which appears to have been implemented.

With all these different applications on the same field, it seems as though Cherwell DC is being taken advantage of, in that there appears to be no coherent plan for Travellers in the District - Travellers have not been catered for in the Bicester Local Development Plan in properly managed **Public Sites** in Bicester Town, so we now have private individuals buying up agricultural fields, with no mains power, water or foul drainage to create totally unsuitable sites as a commercial project. This is no solution and CDC should not treat these applications in such a piecemeal way.

I object to this new application 20/01747/F on the following grounds:-

A) There is no NO NEED for any additional G/T pitches:

- see Mr Colemans comprehensive analysis in his letter to you in responses to this application and application 20/01122/F.

- there have now been an additional 13 pitches across Cherwell in the last 18 months which already meet all G/T requirements, see 2017 GTTA.

NOTE: a previous application in a different area of the same field for 6 pitches (12 caravans) 17/01962/F was only granted at appeal due to the 'perceived need' and it is important to note that the Officer fully acknowledged the unsuitability of the field site. There is now NO NEED for any more G/T pitches and thus this application should be refused.

B) Unsuitable Location:

- Piddington is a Category C village with no amenities (only a church) of only around 160 properties. The proposed site would be the largest in the district and overwhelm and dominate the area.

- Application 17/01962/F which only scraped through on appeal already has 6 pitches for 12 caravans. With a conservative estimate of 4 in each caravan, Travellers will total at least 48. This represents nearly a 15% increase in population of Piddington. If both active applications go through then total caravans will be 36 across 18 pitches. So the resulting new 144 residents would represent an astonishing nearly 50% increase in Piddington population which contravenes planning guidelines to “not overwhelm surrounding populations size and density”.

- the remote field location of the site (8.74km from Bicester services & 3.54km from a small MOD shop in Arncott, both on-the-ground measurements) contravenes both Cherwell District Council (CDC) own Policy and also the Planning Policy from Department Of Communities & Local Government (DCLG) with regards to Travellers Sites because it is well outside the 3km stipulated by Cherwell (*see details below*)

C) Inadequate Facilities and Services:

- no provision for any mains electricity power
- no provision for any mains water supply
- no provision for main sewage connection for foul drainage even though this is stipulated as the site is prone to flooding and thus unsuitable for any septic tanks.

D) Unsatisfactory Amenities on Site:

- no provision for adequate parking spaces
- no turning space
- no provision for recycling storage and collection from site
- no attempt to minimise noise and light pollution from the site
- no details are supplied as to the “*lamppost style light per pitch*”. Any lights will be dominant in the rural area and will adversely affect the enjoyment of many properties as Piddington is a linear village and the lights will be just a few fields away.

E) it is located in a wildlife sensitive area with several Red Listed species of birds, butterflies and amphibians (*see appendix attached to response to active application 20/01122/F*).

Inaccuracies in Application Documents

I am dismayed to see that again there are several inaccuracies in the submitted Form, as there were in the applications 17/001145/F, 17/01962/F, and the active application 20/01122/F.

In particular, the site **is** prone to flooding, there **is** a brook along the northern boundary, there are **no** mains water and **no** electricity on site, there **are** protected and priority species nearby, there is **poor** visibility at the entrance, and the proposed site **can** be seen from the public road Widnell Lane and is **not** within 3 Km of any amenities.

The Block Plan submitted identifies an 'Existing Entrance' for application 20/01747/F. Please note that there is NO EXISTING ENTRANCE onto Widnell Lane from this parcel of land. The only entrance is on the land associated with the active application 20/01122/F.

Please note the errors and omissions above as I would not like CDC to be misled in their considerations.

I) Site Contravenes CDC (para B139* and BSC6*) and DCLG (2015 para 25*) Policies

** relevant policy sections quoted below in italics*

- *“...authorities should very strictly limit new traveller site development in open countryside”*
 - Proposed site is a green-field pasture site in a rural agricultural situation
- *“...Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community” and “which will not be out of scale with or dominate nearby settled communities”*
 - As CDC has already approved on appeal the application 17/01962/F , Travellers will represent a nearly a 15% increase in population of Piddington. As detailed earlier, if both active applications go through, and using a conservative estimate of 4 people per caravan, then the resulting 144 residents would represent an astonishing nearly 50% increase in Piddington population!
- *“...sites will be within 3km road distance of the built-up limits of Banbury, Bicester or a Category A village.”*
 - Accurate road level measurements show site is 8.37 km from Bicester which is the nearest place for amenities such as Schools, Shops, Doctor and Dentist, Entertainment etc. A small MOD shop at Arncott is 3.54 km from site entrance and another small MOD shop and MOD primary school at Ambrosden is 4.18 km.
 - All these measurements are well in excess of the 3km limit set by CDC which must have had careful assessment before inclusion in the Policy given it is a specific measure. CDC should adhere to this strict measurement of 3km – it is neither a stipulated range nor an approximation.
- *“assessing the suitability of sites: a) access to GP and other health services b) access to schools”*
 - The site location is too far from GPs and dentists and schools (8.37 km) – see above
- *“...c) avoiding areas at risk of flooding”*
 - The site is a green-field pasture land, low lying and prone to standing water & flooding [see Drainage Report from previous applications in this field]

- *“...e) the potential for noise and other disturbance”*
 - As there is no mains electricity on site, power will be from generators which will adversely impact the linear village of Piddington which lies less than a mile across fields in a quiet rural environment.

- *“...f) the potential for harm to the historic and natural environment”*
 - The proposed site is in a wildlife sensitive area with Red List species of birds and butterflies – including recorded Curlew, Lapwing, Brown Hairstreak Butterfly, Black Hairstreak Butterfly. The extremely rare Stone Curlew has been sighted locally (see village website).
 - Crested newts are also known around the western edge of the village close to sites of old ponds. The two ponds close to the proposed site need to be assessed again for rare species.
 - Anyone with local wildlife knowledge will also know of the badger set within the scrub land to the east of the proposed Travellers Site.
 - Curlew use the field for the proposed Travellers Site and fields around as feeding stations in the soft wet pasture land. (see BBOWT reserve at Meadow Farm)
 - Given the loss of rural land when the MOD established nearby, it would be a real pity that yet more green-field sites are turned over to hard standing resulting in further loss of habitat and foraging opportunities for Red List species. Any further reduction such as the proposed site will impact these species’ habitats.

- *“...g) the ability to provide a satisfactory living environment”*
 - Unfortunately the proposed site is too far from any services (8.37 Km) such as Doctors, Dentists, Schools as well as shops and entertainment facilities. The arc4 report stated *“GP services were accessed by 90.8% of respondents in Cherwell”* and *“over 90% felt it was important to be close to shops and doctors”* which shows there is a Travellers need for easy access to the medical services. The proposed site will not meet these needs.

Proposed application contravenes the Government Planning Policy for Travellers Sites:- (see House Of Commons Briefing Paper number 07005 19 December 2019 “Gypsies and Travellers:Planning Provisions” by Gabrielle Garton Grimwood)

- The Planning Policy for Travellers clearly states that sites *“must relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density”*.

- Piddington is a small village with no amenities. It is not suitable for any travellers site.

- The Planning Policy for Travellers states that sites should NOT be used by anyone who *“does not meet the definition of Traveller”* and *“EXCLUDES those who have permanently ceased travelling”*.

- Why does the application refer to permanent static caravans when all residents should be Travellers?
- What steps will CDC take to ensure that the owners of ALL the Traveller applications across this field area do not sell on the pitches to non Travellers?

- The Planning Policy for Travellers states that *“Local Planning Policy must consider needs for Travellers when preparing Local Plans”*

- So, IF there is a need for Traveller Sites, why hasn't Cherwell set aside sites in the town development area to provide for Travellers?

- The Planning Policy for Travellers states that Public Sites for Travellers now represent only 29% of sites, and Private Sites now account for 59% of sites (vs 41% in 2008).

- **It seems that because Cherwell has NOT provided Public Sites for Travellers, this has encouraged private sites that are not in suitable areas, well away from amenities that are so important for Travellers.**

Finally, I understand that the applicant for 17/01962/F (which scraped through at appeal), is planning to sell the individual pitches to the onsite residents as a commercial enterprise. Given that the Planning Policy clearly states that Travellers should travel, what conditions or covenants will CDC enforce to ensure that ALL the Traveller residents are indeed travelling and are thus part-time residents on the plots? It is odd that every pitch on the plan has a static caravan if the site is for Travellers solely...

In conclusion, all the above demonstrates clearly that **the location of the proposed Travellers site contravenes CDC's own policy** and that set out by the DCLG. It will not contribute positively to the surrounding environment or communities. The loss of green-field pasture land is highly likely to be detrimental to Red List species of wildlife. But most importantly the proposed site will in no way address the concerns of the Travelling Community and fails to meet their needs as reported in CDC's own independent research.

Moreover, with the 13 G/T pitches newly approved in other applications in Cherwell, there is **NO CURRENT NEED** for any more G/T sites in Cherwell.

I urge CDC to reject the planning application and seek more appropriate alternatives within the 3 Km (by road) of Bicester or Banbury which would better suit the Travellers themselves.

Yours faithfully

I Dodson

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