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Dear Sirs,

Consultation on Gypsy and Traveller Sites Allocations

On behalf of our client, Marstons Plc, we write in response to the public consultation on the above document and to set out our concerns regarding the current selection of preferred sites. In particular, our response focuses on suggested sites GT11 - Land at Budbrooke Lodge, Racecourse and Hampton Road and GT18 - Service Area east of A46, Old Budbrooke Way.

The Council have defined at paragraph 7.3 the criteria by which all sites are to be assessed for suitability. However, site GT11 is in clear conflict with a number of the relevant criteria. Firstly, the criteria specifies that sites must avoid areas at risk of flooding although the defined flood map for the area identifies that part of the site is at risk. In this regard, the site should be discounted.

The criteria also requires sites to avoid areas where there could be adverse impact upon important features of the natural and historic environment. As the Council will be aware, the whole of the subject site is presently designated as an Area of Restraint under policy DAP2 of the Adopted Development Plan and Proposals Map. This defines that development will not be permitted within such designated areas where it would harm or threaten the open nature of the site. Therefore, the suggested site would not only conflict with adopted policy but would also significantly harm what is an important natural asset, confirmed by its designation. The development of the site would also significantly harm the open character of the area and would thus further conflict with the defined criteria.

The above matters in relation policy DAP2 and the impact upon the important features of the site and character of the area also apply in full to suggested site GT18 and thus both sites should be discounted for not meeting the relevant criteria.

In addition to the above, it is noted that the Council have suggested that they may consider using compulsory purchase powers if the required pitch numbers cannot be met. However, it is considered that this would not be an appropriate use of public money without first fully exploring all Council or Warwickshire County Council land first. It is noted in the document that the one of the sites suggested is County Council land although it is not made clear in the document which site this is. If the County Council land is either of the above sites then the conflict set out above would override this consideration and a full audit of all other Council land would first need to be undertaken, with the relevant assessment / findings published.

I trust the above will be taken into consideration as the Council progress the Site Allocations Document further and we would request that we are kept fully informed on all relevant progress in due course. Should the Council have any queries regarding the above, then please do not hesitate to contact us.

Yours faithfully,



Steven P. Hearn

Concept Town Planning Ltd.

cc. Henry Plant - Marstons Plc.