

Mr David Barber
Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

26 July 2013

Dear Mr Barber,

Local Plan – Sites for Gypsies and Travellers

We are writing on behalf of our client, The Guide Dogs for the Blind Association [Guide Dogs] in response to Warwick District Council's publication of its Sites for Gypsies and Travellers document which forms part of the consultation on the Preferred Options for the new Local Plan. It is understood that this consultation period expires on 29 July 2013. The publication of this document follows the recent Landowners Forum held at Leamington Spa Town Hall on 14 May 2013. We attended this forum meeting with Guide Dogs senior staff and subsequently wrote a letter to officers dated 20 May 2013. **We enclose a copy of that letter and request that its content is considered as part of these representations.**

To summarise, Guide Dogs' National Breeding Centre [NBC] is located adjacent to Bishops Tachbrook on the Banbury Road. It was constructed in 2009 and supplies dogs to all of Guide Dogs' regional Training Centres throughout the UK. It produces 1,350 puppies per annum and is the largest single breeding centre of dogs in the UK and possibly the world. There can be up to 180 animals on site at any one time comprising 100 adult dogs and 70-80 puppies. The scale of this operation has necessitated a state-of-the-art centre which was a huge investment for Guide Dogs to undertake, costing in the region of £20 million. Of great significance at the planning stage was the identification of a suitable site. This had to be separate from existing built-up areas and especially other dog populations. This is because the breeding of dogs has to be strictly controlled to avoid the risks of infection of pregnant female dogs and new born puppies, whose immunity and resistance to disease is at its lowest.

The introduction of a Gypsy and Traveller site, with the potential for a new population of dogs adjacent to, or in the vicinity of, the NBC, would give Guide Dogs considerable concern. This is because of the likelihood that these dogs will be of lower vaccination and health status than Guide Dogs, and are at risk of carrying diseases not seen in the

Guide Dogs population. There would be no guarantee of the health management of those dogs, nor any control over the movement of dogs onto the designated site which are not normally resident there. Cross infection into the NBC means the risk of losing brood bitches and puppies to disease. This would be very costly to the breeding programme and detrimental to Guide Dogs' Nationwide distribution network. In addition, the NBC accommodates female dogs that are in oestrus ("season"). These females produce pheromones specifically to attract male dogs. A local and potentially free roaming population of male dogs would be constantly trying to enter the Breeding Centre to seek out the females; the nuisance aspect would be considerable and will also increase the disease risk because such male dogs will have a positive desire to enter the Centre rather than simply living nearby. Accordingly, we do not consider that it would be acceptable for a proposed Gypsy and Travellers site to be located adjacent to, or in the vicinity of, Guide Dogs' NBC.

Sites for Gypsies and Travellers Document – General Comments

The document advises at paragraph 2.5 that enquiries have been made of landowners to identify potentially available land. We confirm that the Council has contacted Guide Dogs and we attended the Landowners Forum meeting on 14 May 2013. At that meeting, and in our follow up letter dated 20 May 2013, we made it clear that Guide Dogs' land and the surrounding area would be unsuitable to locate a gypsy and travellers site.

Paragraph 7.3 of the document states that the Council will bring forward sites using a list of policy criteria that includes avoiding areas where there is the potential for noise and other disturbance. It is considered that officers must not have been fully appreciative either of the scale of operations at Guide Dogs' NBC site or of the implications of introducing a new population of dogs into the vicinity in terms of the health risks to NBC puppies, brood bitches and female dogs in season. We believe we can clearly prove that a gypsy and traveller site in the area of the NBC would cause significant disturbance to Guide Dogs as a national charity.

Paragraph 10 of national guidance 'Planning Policy for Traveller Sites' document published alongside the NPPF states at paragraph 10 that criterion-based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community. In this regard the NBC has been established in this part of the District for many years and Guide Dogs interests as an important organisation in the local community should be respected.

Paragraph 11 of Planning Policy for Traveller Sites says that local planning authorities should ensure that traveller sites are socially sustainable, as well as economically and

environmentally, therefore policies should, amongst other criteria, promote peaceful and integrated coexistence between the site and the local community. For the scientific and practical reasons we have described, the location of a gypsy and traveller site adjacent to the NBC would not result in compatible and integrated land uses.

The Council's document advises at paragraph 8.5 that it is willing to consider using its powers of compulsory purchase if pitch numbers cannot be met and landowners remain reticent in the promotion of suitable and sustainable sites. Notwithstanding that we have already explained why Guide Dogs' land is not suitable, we wish to make it clear that an attempt by the Council at compulsory purchase would be met with strong resistance.

Areas of Search - GT10 Land at Tollgate House and Guide Dogs National Breeding Centre

This area represents the greatest danger to Guide Dogs as an organisation in terms of the adverse effect on its ability to supply its Nationwide Training Schools with guide dogs. The whole of this area will be within $\frac{3}{4}$ of a mile of NBC, which is well within range for a new population of roaming dogs to access NBC. On that basis this area of search is completely unacceptable and we strongly object to it being included in later stages of this document.

Such is the concern regarding this area that Guide Dogs has consulted Professor Gary England, who is the Foundation Dean of the School of Veterinary Medicine and Science at the University of Nottingham and is Professor of Comparative Veterinary Reproduction. Professor England comments that there would be no guarantee of the health management or movement of a population of dogs introduced adjacent to the NBC site. These dogs may carry diseases which are not seen in the Guide Dogs' population because of the vaccination regimes that Guide Dogs follows. Male dogs would also have a positive desire to enter the NBC site to seek out female dogs in season. **A full version of Professor England's letter, which was written after having been provided with a copy of the Council's Gypsy and Traveller document, is enclosed with this letter.**

Guide Dogs also objects to this area of search because it includes the Tollgate House site and NBC itself. Both sites are currently in operational use by Guide Dogs and form an essential part of the functioning of the organisation. It is considered to be illogical on the part of the Council to include Guide Dogs' land and buildings in this area of search as the NBC site was specifically selected and granted planning consent for its secluded location. Please note that Guide Dogs would strongly resist any attempts at compulsory purchase by the Council, through the courts if necessary. It is understood from Guide



Dogs' solicitors (Eversheds) that the costs to the Council to successfully purchase the NBC site would in any event be prohibitive – running into tens of millions of pounds.

We trust that the Council will take the seriousness of these comments into appropriate consideration. Thank you for your co-operation and we look forward to confirmation that these representations have been received.

Yours sincerely,

DNS Planning and Design

Enc

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