Formal objection to Warwick District Council's proposal for a Gypsy and Traveller site on land at Stratford Road, Warwick

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1. Introduction

On Monday November 3rd Warwick District Council (hereafter referred to as 'WDC') instigated a 6-week Public Consultation process asking local residents to consider its proposal for a permanent 15 site Gypsy and Traveller site on land off Stratford Road in Warwick. The specific site identified is shown in the map below a copy of which was included in the WDC's 'Consultation Document'.



The purpose of this objection is to highlight specific issues and problems with the proposed Stratford Road site which I believe render it completely unsuitable for its proposed use.

In identifying these issues I have made extensive use of the following documents:

- WDC's Consultation Document titled 'Gypsies and Travellers Preferred Options Consultation -Land at Stratford Road, Warwick.
- WDC's Sustainability Assessment of the Stratford Road site titled 'Revised SA of the Stratford Road Gypsy and Traveller Site Allocation'.
- 3. WDC's 'Land at Longbridge Fluvial Flood Risk Note September 2014'.
- 4. WDC's 'Environmental Noise Assessment for Planning Purposes at Five Sites'.
- The Department for Communities and Local Government document 'Designing Gypsy and Traveller Sites Good Practice Guide'.

Having read through the consultation documentation referred to above and all the other supporting documentation provided by WDC, I would like to make a general observation about the lack of detailed information provided by the Council.

In a number of fundamental areas the consultation document has simply provided no information what so ever that local residents could use in determining the suitability of the proposed site, and in other areas the WDC has alluded to further updates and reports that have not subsequently been published during the term of the 6-week consultation. Specific examples of these are included under each relevant issue upon which I wish to object.

This I believe is symptomatic of what appears to be WDC's main motive in recommending the Stratford Road site, which appears to have been a desire to quickly eliminate the 15 permanent site shortfall which their previous Public Consultation (which had considered over 20 separate sites) had left them with. This has led to the current consultation being launched into far too quickly and without the proper level of detailed information being available to make an evidence-based assessment of the site in terms of either its viability or suitability.

In my opinion the rushed nature of this consultation and the lack of detail in a number of key areas calls into question whether the 6 week consultation period has been an adequate or worthwhile exercise.

2. Specific reasons for objecting to the Stratford Road site

I wish to state my objection to the proposed Stratford Road site on the basis of 7 specific criteria. These criteria have been chosen as they were used by WDC themselves as criteria for assessing the suitability of the site in either:

- a) The published Consultation Document (which used 19 specific criteria) or
- b) The published Sustainability Assessment (which used 16 specific criteria referred to in the document as 'objectives')

I have drawn criteria from both of the above documents as I have been greatly concerned by the fact that certain key criteria from the Sustainability Assessment have simply not been mentioned in the subsequent Consultation Document. This includes a number of criteria in the Sustainability Assessment that had indicated potential problems or issues with the proposed site that called into question its overall suitability. Furthermore I have been even more shocked by the fact that in the official Representation Form that WDC have published for local residents to use if they wished to register an objection against (or indeed support for) the proposed site, the number of criteria had been reduced to just 5 and the form itself stated the following:

'Please set out full details of your objection or representation of support with reference to the criteria above'. i.e. only the 5 criteria detailed on the form.

In only providing these 5 specific criteria WDC have conveniently omitted any of the other criteria they have previously used that have flagged-up potential problems or issues with the site.

I believe that the Representation Form has been deliberately worded in this manner to make local residents think that they could not raise objections based on other criteria and therefore try and reduce the number of valid objections that local residents would submit.

I feel this represents a significant manipulation of the entire 6-week Public Consultation process which calls into question its whole validity as an exercise.

Consequently in framing my objection I have ignored what appears to be WDC's deliberate attempt to restrict the basis on which valid objections can be made and have, as stated previously, based them on criteria that WDC have themselves used.

My specific points of objection are therefore as follows:

2.1 Access

The Council's Consultation Document completely fails to address the issue of Access to the proposed site simply stating under criteria 15. Access issues:

'Advice expected from WCC soon'.

However at no point during the consultation process has WDC provided any further information about Access issues. This underlines the rushed and incomplete nature of the whole consultation process.

I believe that Access to the proposed site is a major problem for the following reasons:

- a) Unless Sevem Trent Water are willing to provide access to the site across their land (which they have indicated they would not) then the current narrow farm track leading to the site from Longbridge village would have to be used. This narrow farm track would be totally inadequate.
- 'b) The Government's own guidelines on planning Gypsy and Traveller sites (taken from the 'Designing Gypsy and Traveller Sites Good Practice Guide') set some very strict guidelines around access, particularly for Emergency Vehides stating that:

'In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles'

and

'To increase potential access points for emergency vehicles, more than one access route into the site is recommended. Where possible, site roads should be designed to allow two vehicles to pass each other (minimum 5.5m). Specific guidance should be sought from the local fire authority for each site'.

The current farm track would therefore appear to be totally unsuitable for access by emergency vehicles.

c) The access road to Longbrige itself, which is the only way of reaching the narrow farm track, is on a dangerous bend in the A429 with poor visibility for motorists approaching it. The Government's own guidelines on planning Gypsy and Traveller sites (taken from the 'Designing Gypsy and Traveller Sites Good Practice Guide') state:

'In designing the layout of a site enough space must be provided to permit the easy manoeuvrability of resident's own living accommodation both to the site and subsequently on to a pitch. Account needs to be taken of a more recent tendency for members of the Gypsy and Traveller communities to favourthe use of a mobile home in place of the traditional caravan, and some mobile homes could be up to around 25 metres in length'.

and

'In order to overcome this, the site design should strike a balance between enabling a variety of accommodation to be catered for, and making best use of available space. Access roads and the site design itself should be capable of providing sufficient space for the manoeuvrability of average size trailers of up to 15 metres in length, with capacity for larger mobile homes on a limited number of pitches where accessibility can be properly addressed in the light of the land available'.

Such access requirements appear to be totally at odds with the proposed location of the site and the prospect of very large slow moving motor homes or trailers attempting to enter or exit the site via the Longbridge turning off the A429 would appear at face value to be extremely dangerous.

d) In addition, accessing the site from Longbridge would place the main entrance to the site next to a Grade 2 listed building (Longbridge Manor). However WDC's consultation document makes no reference to the possibility of the site being accessed via a route next to a listed building simply stating against criteria 3. Historical Designation

'None'.

Surely if the main entrance to the site is going to be opposite a Grade 2 listed building then WDC should have flagged this up for the benefit of local residents in the Consultation Document?

Overall therefore it appears therefore that WDC have completely failed to make any meaningful assessment of likely problems in terms of access to the site and furthermore have not published any further guidance on this very important issue during the 6-week consultation process.

Conclusion: the proposed site is completely unsuitable due to major problems with access and therefore fails to comply with Government guidelines.

2.2 Air, Water and Soil Quality

The Council's own Sustainability Assessment identified this as a specific area of concern (detailed as criteria 9 in the Assessment) highlighting it in red and stating the following in the supporting commentary:

'The potential air quality issue identified above, the presence of a surface water Nitrate Vulnerable Zone 3 as well as loss of Grade 3a agricultural land means that there is the potential for a major negative effect against SA Objective 9'.

However having read through both the Consultation Document and other reports published by WDC as part of the 'Evidence Base' to support the consultation I cannot find any further information that details how WDC intend to mitigate the 'potential for a major negative effect' that its own assessment has highlighted.

I note that WDC did commission an 'Environmental Noise Assessment' in order to assess whether potential risks that had been highlighted in relation to objective 14. Health and Wellbeing could be mitigated, which makes it all the more troubling that WDC has not provided any further information about the largest area of concern that its own Sustainability Assessment had identified.

The Consultation Document acknowledges the issue of the site being on a Nitrate Vulnerable Zone 3 under criteria 7. Contamination and other constraints, but has provided no further guidance on what the realistic contamination risk is. Furthermore, having acknowledged that there will be a loss of Grade 3a agricultural land under the criteria 8. Agricultural land quality, the document provides no further information on how this will be mitigated either.

Consequently I would contend that on the basis of the available documentation the proposed site is not suitable because issues relating to 'Air, Water and Soil Quality' have been identified as a serious potential issue by WDC with no plans for mitigation in place.

Furthermore I remain very surprised that none of the above was mentioned in the official Representation Form as a criteria for objecting.

Conclusion: the proposed site is unsuitable due to the issues with Air, Water and Soil quality highlighted by WDC and for which they have offered no specific mitigation.

2.3 Health & Wellbeing / Health & Safety

WDC's Sustainability Assessment did make an assessment of the site under the criteria (objective) of Health & Wellbeing (objective 14) but only graded this as a partial yellow with the commentary 'Potential for a residual minor negative effect against SA Objective 14'.

However in my opinion this criteria is far too specific and narrow and WDC have failed to take into the account the wider Health & Safety risks posed by the site. Once these are taken into account I believe that they render the site totally unsuitable.

The government's own guidelines on planning Gypsy and Traveller sites state that:

'It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children. All prospective site locations should be considered carefully before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk'.

At face value therefore the proposed site would be appear to be totally unsuitable based on the criteria above due to its location:

- a) Having a sewage works a few hundred yards to the North
- b) Having a river on its eastem edge
- c) Having a busy motorway a few hundred yards to the South

All 3 of these would make the site potentially very dangerous for children.

The Government's own guidelines on planning Gypsy and Traveller sites (taken from the 'Designing Gypsy and Traveller Sites Good Practice Guide') state:

'When designing the layout of a site, careful consideration must be given to the health and safety of residents, and in particular children, given the likelihood of a high density of children on the site...'

Of particular concern to me is the proximity of the site to the river. In the objection submitted by residents of Barford to the proposed site designated GT12, they had highlighted the health and safety risk posed by the river stating that:

'In 2012 a Barford man and his child were drowned in the river'

The risk posed by the river to children is arguably considerably greater at the proposed site on Stratford Road. However, with major health and safety risks on 3 sides of the site, the security measures required to make the site completely safe and secure for children are likely, through necessity, to give the site the feel of a 'secure compound'. This would be appear to be completely at odds with the government's own guidelines on planning Gypsy and Traveller sites which state that:

'More open boundaries may be used in residential areas so as to promote integration and inclusion with the surrounding community, although the degree of integration which can be achieved will be in part governed by the degree of community cohesion already experienced in that location. A balance needs to be struck between providing privacy and security for the site residents and avoiding a sense of enclosure through for example, the use of high metal railings.

It is difficult to see how this balance can be struck given the significant major health and safety risks located all around the proposed site.

Conclusion – The proposed site completely unsuitable as it is located close to 3 major sources of

Health & Safety risk, particularly for children and therefore fails to comply with Government guidelines.

2.4 Flood Risk

Again the Council's own 'Sustainability Agreement' identified this as an area of concern (flagged as yellow) indicating a 'minor negative effect'. Nevertheless they have confirmed that the site is on a designated flood plain within flood zones 2 and 3.

The government's own guidelines on planning Gypsy and Traveller sites state 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)'.

The Consultation Document states that the Council has a technical report endorsed by the Environment Agency saying that the risk of flooding can (once again) be 'mitigated' and this will 'eradicate the threat completely'.

I have reviewed this document (titled 'Land at Longbridge Fluvial Flood Risk Note September 2014') which is a report prepared by 'Brookbanks Consulting Limited' on behalf of 'Severn Trent Property Ltd'. In my opinion this report is highly speculative and does not actually contain any specific evidence that proves that the flood risk status of the proposed site can be alleviated.

I base the above assertion on the fact that the report identifies 'Old House Brook' as the source of the current flood risk to the site but then notes the following in its summary:

'That said, whilst the one of the 2D elements of the modelling covers the proposed site, the Old House Brook has not been included in the modelling exercise and thus, the subsequent floodplains associated with this watercourse, shown within the 2010 modelling report, is based on less accurate, historic modelling techniques'.

i.e. in preparing the report Brookbanks Consulting have not actually had any data available to them specifically relating to Old House Brook. They go onto say:

'To ensure the most accurate and efficient outcome is achieved, it is recommended that a Stage 2 assessment is undertaken whereby both the Old House and Horse Brooks and surrounding areas undergo detailed modelling assessments to define the extend of flooding in more detail.

On the basis that the Stage 2 report provides positive results, Stage 3 alleviation assessments are considered viable to remove the site and some surrounding areas from the floodplain, thus reducing the risk of flooding and making the site a more preferable location for development.

i.e. further assessments are required to actually provide proper data that could be used to decide the true flood risk posed by Old House Brook.

Furthermore, the consultants have gone onto to suggest that the most viable solution to the risk of flooding by Old House Brook is the construction of an 'Alleviation Storage Scheme'. An overview of this is shown on the following page (which has been taken from the report itself).



Figure 4a: Option 1 - Water storage within the site

'Option 1 - Alleviation Storage

Similarly to the principles of a level for level compensation scheme, it may be possible to lower an area of land towards the south east of the proposed development to provide additional flood plain storage within the site, creating a flood storage berm.

At the downstream end of the site, near to the culvert beneath the M40 on the Old House Brook, a control structure could be put in place to limit the volume of water flowing downstream and retain peak discharges of water within the storage berm, thereby attenuating peak flows to a rate may be safely conveyed along the downstream channel.

During critical storm events the control structure will be designed to permit the maximum volume of water into the Old House Brook without causing out of bank flows. All additional flows will be redirected and into the storage area. Once the critical event has decreased the structure will release the retained water back into the Old House Brook at a controlled rate so as not to overlaod the watercourse. The control of peak flows through the Old House Brook provides valuable flood alleviation benefits as this will also provide alleviation for areas surrounding watercourses'.

This suggests that the only the only way to mitigate current flood risk designation of the proposed site is an expensive flood alleviation scheme covering the route of the Old House Brook from the M40 to a storage berm located the south of Home Farm.

However no outline/estimated costs have been provided for this scheme which means that there is no certainty that it could actually be implemented without making the site completely commercially unviable. i.e. the fact that such an alleviation storage system could technically be put in place does mean that the flood risk to the current site could be alleviated.

Furthermore a scheme of this nature would involve the section of Old House Brook that flows behind 'The Peacocks' residential development on one side and the 'Tournament Fields' development on the other bank. Consequently the brook and its banks at this point are on private land belonging to the 2 parties above. Given that the proposed scheme states that:

'During critical storm events the control structure will be designed to permit the maximum volume of water into the Old House Brook without causing out of bankflows'.

Then residents of the Peacocks whose properties back directly onto Old House Brook may refuse to give permission for the necessary work to be carried out on their land. In recent years water levels in the brook at this point have become very high during storm events partly a result of capacity issues in the culvert that subsequently carries the water under the A429. WDC could potentially overcome this issue by placing a Compulsory Purchase Order on the land along this section of the brook but this would further increase the costs of the overall flood risk mitigation scheme.

Conclusion: the proposed site is unsuitable as it is on a designated flood plain within flood zones 2 and 3 and therefore does not comply with Government guidelines. The report by Brookbanks Consulting does not provide any specific evidence that the flood risk can definitely be eliminated but does imply that an expensive 'Alleviation Storage scheme' would be the most likely solution. This also renders the site totally unsuitable on grounds of commercial viability.

2.5 Negative effect on the local Economy

In the Council's own Sustainability Assessment this section is graded as '?' and the supporting commentary states that 'the effect on the economy is uncertain at this stage'. Furthermore the Consultation Documentation makes no mention of the potential effect of the site on the local economy in its criteria at all! Unsurprisingly this criteria is not mentioned at all on the official Representation Form.

I am genuinely shocked that WDC appears to have shown such little interest in the potential effect of this proposed site on the local Warwick economy.

The site would be broadly opposite the 'Tournament Fields' business park development. When this was first opened almost 10 years ago it was to be promoted as 'Warwickshire's Premier Business Park' with grand claims of what it would do for the long-term economic growth of the local Warwick economy.

Currently Tournament Fields is still advertising '700,000 sq. ft available' and the majority of the site remains undeveloped.

Siting a permanent Gypsy and Traveller site opposite this prestigious development is already generating a huge amount of local controversy and opposition and this sort of publicity will make it even more difficult to effectively market Tournament Fields to new businesses. Given that attracting new businesses has already proven extremely difficult the new site could suppress potential demand still further.

Furthermore, even if WDC do recommend proceeding with the site, the process of getting final planning approval via the Secretary of State could drag on for several months (if not longer)

particularly given that appeals will inevitably be made by local residents to the Secretary of State to reject WDC's proposal.

All of this controversy, negative publicity and uncertainty will greatly harm the Tournament Fields development and reduce the likelihood of it attracting new businesses to the Warwick area.

Conclusion: the proposed site is unsuitable as it will have a severely detrimental effect on one of Warwick's most important sites of local economic development. This is an important criteria for assessment (notwithstanding WDC's complete failure to make that assessment as part of the Consultation process).

2.6 Availability

One of the key criteria that should be used in any assessment of the site is that of availability. This is listed as criteria 18 in WDC's Consultation Document under which it has simply stated 'Available'.

However I would contend that it is by no means certain that the site is actually available and, at the very least, the question of availability is extremely confused.

The Consultation Document does not state who the owners of all the pieces of land required for the site would be apart from WDC themselves. However it is my understanding that overall 3 parties involved are:

- a) Sevem Trent Water- who own the land to the north of the proposed site, which has been earmarked for employment/commercial use.
- b) WDC
- c) Mr and Mrs Webb of Home Farm, Longbridge

Throughout the consultation process WDC has maintained that all of the parties were supportive of the project and willing to make their land available. However it is my understanding that Sevem Trent Water were never made aware of the WDC's intention to include a permanent Gypsy and Traveller site at the bottom of their proposed development of land for economic/commercial use.

I have seen a copy of a letter from Sevem Trent Water formally stating their opposition to the proposed site. For your reference this letter has been included in the formal objection submitted to WDC by the Chase Meadow Residents' Association and I have had the opportunity to read it in full. The relevant excerpts from the letter are as follows:

'However to our complete surprise WDC have subsequently informed us that they wish to see part of the future employment development set aside to accommodate a Traveller site.

I can confirm that STW has not agreed with the Council to provide any land to facilitate such a use and furthermore we have not committed to realign the Cordon Sanitaire to enable the Council to use their own land for such a use.

We will in fact be making formal representations to the Council at the appropriate time stating that we believe this to be a wholly inappropriate site to have alongside a high quality employment

development and that only uses consistent with a high quality office environment should be considered'

On this basis the land to be provided by Sevem Trent Water is clearly not available. Furthermore the letter states that 'we have not committed to realign the Cordon Sanitaire to enable the Council to use their own land for such a use'.

However in the introduction to the Consultation Document WDC states that:

...the Council has been made aware of a hitherto unidentified area of land off Stratford Road at Warwick, which currently lies within a 'cordon sanitaire' around the Sewage Treatment Works. It is possible that if some additional investment is made in the Sewage Treatment Works, the 'cordon sanitaire' may be reduced which would release a large area of land around the works; particularly to the south, for potential development. Warwick District Council also owns an area of land here which could be included within the overall development to make up a total of some 26ha. It is suggested that the land could be used for employment/commercial uses and the Council also considers that a permanent site for Gypsies and Travellers could be accommodated here'.

This statement is very vague (possibly deliberately so) because the development of the Gypsy and Traveller site and the site for employment/commercial uses are supposed to be mutually exclusive, but it does imply that additional investment in the cordon sanitaire is required to make both sites vaiable. However Sevem Trent Water make it clear that they have 'not committed to realign the Cordon Sanitaire' which at face value would appear to raise a major question-mark about whether the site is actually viable.

Clearly therefore, whilst Sevem Trent Water is not the owner of the land that the site is actually on, if the land owned by Sevem Trent Water is not available then the viability of the Gypsy and Traveller site must be called into question.

Conclusion: the proposed site is unsuitable as the land earmarked for this development is not definitely available as at least one of the land owners involved is opposed to the site and has stated this in writing. WDC have issued confusing and contradictory information as part of the consultation process, much of which has since been refuted by Sever Trent Water.

2.7 Viability

I also believe that the Stratford Road site is unsuitable because ultimately it is commercially not viable.

Para 9 of the PPPTS 2012 states, in relation to the need for Gypsy and Traveller sites:

'To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable'.

This lack of viability, is I believe, due to the significant costs that will clearly be associated with making the site suitable for its proposed purpose. By referring to the various documents issued by the WDC it is clear that the following works would be required:

- a) Investment in the 'cordon sanitaire' around the sewage works.
- b) Investment in an 'Alleviation Storage Scheme' to mitigate the risk of building the site on a designated flood plain.
- c) Investment in upgrading the single lane farm track from Longbridge in order to make it sufficiently wide to meet government guidelines on access to the site (including for emergency vehicles).
- d) Investment in landscaping and screening to mitigate noise from the M40 motorway.
- e) Investment in safety/security measures to ensure that the site is safe for children and prevents access to the river, M40 motorway or the sewage works.

WDC have assured local Council Tax payers that the cost of all of the above would have to be borne by the future prospective private developer i.e. someone who is willing to purchase the site, carryout all the required works that have been identified to make the site suitable in order to obtain detailed planning permission, fund the completion of those works and then sell or rent the 15 permanent sites to Gypsy and Traveller families at a price that makes their initial investment worthwhile. However, as WDC have not provided estimates for any of the costs associated with items a) to e) it is obvious that they do not know whether the site is commercially viable or not. Such a judgement cannot possibly be made at this stage given that costs could be very substantial indeed once full technical reports have been obtained.

I therefore feel that it is entirely inappropriate for WDC to have indicated in the Consultation Document that the site is 'Deliverable with the first 5 years of the Plan' under criteria 19. Deliverability.

An assertion of this nature cannot and should not have been made when the costs involved in making the site suitable for its intended use are simply not known.

Conclusion: the proposed site is unsuitable as the list of works required in order to make the site suitable (using WDC's criteria) imply very substantial levels of investment would have to be made by any potential developer and as such these would make the site commercially not viable and therefore ultimately not deliverable.

Summary

In conclusion, therefore, I object to the proposed Stratford Road site on the basis that the site is completely unsuitable when judged against the 7 following criteria:

- 1. Access issues
- 2. Air, Soil and Water quality issues
- 3. Health & Wellbeing/Health & Safety issues
- 4. Flood risk issues
- 5. Negative effect on the local economy
- 6. Availability issues
- 7. Viability issues

Furthermore I wish to state that I am very unhappy with the way the 6 week public consultation process has been carried-out with regard to the following 3 specific points:

- 1. The official Representation Form that local residents have been encouraged to use only lists 5 specific criteria on which the suitability of the site is to be assessed. This is completely at odds with the fact that the Consultation Document details 19 specific criteria that were used in assessing the suitability of the site and 16 criteria (objectives) when assessing its Sustainability. This appears at face value to have been a deliberate attempt to imply that criteria outside of the 5 listed were not valid reasons for objecting.
- 2. The process appears to have been started without many reports and pieces of evidence being available and where it was indicated that such reports/evidence would be shortly available, nothing has actually been produced during the 6-week period allocated. This has rendered much of the consultation process completely meaningless as across a number of criteria local residents have not been provided with sufficient information on which to form a clear opinion of the sites suitability or otherwise.
- 3. The process appears to have been launched into far too soon and far too quickly with significant areas that should have received careful consideration by WDC appearing to have had none at all. I would highlight the complete lack of any meaningful assessment of the impact of the proposed site on the local economy in either the Sustainability Assessment or the Consultation Document as a specific example of this. Furthermore where reports have been made available as part of the 'Evidence Basis' they have often been high level initial studies, very lacking in detail, and crucially where they have recommended that work was required on the site to make it suitable for its intended use, absolutely no estimates of costs have been provided.

On the basis of the above 3 points I feel that the credibility of the Public Consultation has been seriously undermined and has not been of sufficient quality or rigour to meet the statutory requirements for such an exercise.

In summary, therefore, I would ask that WDC acknowledges that the proposed site at Stratford Road is totally unsuitable for its intended use as permanent Gypsy and Traveller site and does not progress any further with this specific proposal.

Whilst acknowledging that WDC does have a statutory obligation to provide sufficient permanent and temporary pitches to meet the accommodation needs of the Gypsy and Traveller population within their area, this is no way justifies the selection of a site that is clearly completely unsuitable across a wide range of specific criteria. WDC need to think again and come back to the people they serve with a better solution more appropriate for, and sympathetic to, the beautiful and historic town of Warwick.

Simon Armer

