

25 November 2022

Our Ref: MPB/466354

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, set against a yellow rectangular background.

The Secretary of State for Transport
Tyneside House
Skinnerburn Road
Newcastle Business Park
Newcastle Upon Tyne
NE4 7AR

Matt Brown MRICS FAAV
E: matt.brown@savills.com
DL: +44 (0) 1392 294898

Sterling Court
17 Dix's Field
Exeter EX1 1QA
T: +44 (0) 1392 455 700
savills.com

By email only: nationalcasework@dft.gov.uk

Dear Sir/Madam

SUMMER LANE CARAVAN PARK COMPANY LIMITED OF THE OFFICE, SUMMER LANE CARAVAN PARK, BANWELL, SOMERSET, BS29 6LS

NORTH SOMERSET COUNCIL (BANWELL BYPASS AND SOUTHERN LINK CLASSIFIED ROAD) (SIDE ROADS) ORDER 2022

NORTH SOMERSET COUNCIL (BANWELL BYPASS AND SOUTHERN LINK) COMPULSORY PURCHASE ORDER 2022

We refer to the letter dated 10 October 2022 from Burges Salmon LLP, and the enclosed CPO Notice, Copy SRO Plans, SRO Notice and Statement of Reasons. On behalf of SUMMERLANE CARAVAN PARK COMPANY LIMITED, we write to object to the Compulsory Purchase Order as stated above.

SUMMER LANE CARAVAN PARK COMPANY LIMITED is the owner of Summer Lane Caravan Park, a residential park home with further agricultural and amenity land. There are 140 park homes occupied 365 days per year by residential occupants across the majority of the property and the remainder is used as agricultural, amenity land and in conjunction with the park home.

The Compulsory Purchase Order and Side Roads Order proposes to permanently take land from the southeast corner of the property along with creating the main site compound for the entirety of the scheme, in the area immediately adjacent to the park home.

We object to the use of the property as the main site compound on the following grounds:

1. Business Disruption

The siting of the proposed main site compound is very close to the caravan park where many of the residents are elderly.

The business operated on the property relies upon the demand for the park homes for residential use and their ongoing transfer and sale. The park home is currently successful due to its location being accessible but undisturbed and unspoilt.

We expect the compound, with constant vehicle movements and machinery use, will create significant disturbance such as noise, lights, dust, fumes and will create an eye-sore. This will occur over many years and will therefore severely restrict the benefits the park currently enjoys. This in turn will result in a detriment to the business.

We have been provided with a letter from ARUP in response to planning objections stating that an earth bund and herras fence will mitigate such issues but we consider these measures will unlikely be sufficient and the explanation significantly lacking in detail and as such have no comfort in the brief information provided.

We have requested a detailed proposal for an agreement to occupy the compound area, but this was not provided.

We need to be provided with a proposal for barriers to noise and how visual barriers will be used to shield the park from the compound. Without any such barriers or insufficient barriers the compound represents a risk to the wellbeing of the residents of the park and my clients business.

Further related to the compound, we need to know the intention of use, the hours of operation and what plant and machinery will be sited there and when.

In summary the proposals indicate that a successful local business will be severely impacted and insufficient is available or has not been provided to demonstrate how the effects will be mitigated.

It should be noted that Summer Lane Caravan Park Limited have no objection to the location of the actual road and the taking of their land for this purpose. As set out above, they do not have evidence that as of yet, North Somerset District Council have properly considered the impact the siting of the main site compound adjacent to its property, will have.

We are willing to discuss the above matters with North Somerset District Council with a view to seeking a satisfactory conclusion for both parties involved but, until such time as a satisfactory conclusion is reached, this objection remains extant.

Yours sincerely

A large black rectangular redaction box covering the signature of Matt Brown.

Matt Brown MRICS FAAV
Director