

Local Development Framework

**Gypsies and Travellers Site Allocations
Development Plan Document**

**Sustainability Appraisal Scoping Report:
Addendum**

July 2010

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1. Introduction

1.1 Bath & North East Somerset Local Development Framework

1.1.1 Bath & North East Somerset Council is currently preparing a Gypsies and Travellers Site Allocations Development Plan Document (DPD) to form part of the Local Development Framework (LDF) that will eventually replace the existing Local Plan (2007). The LDF is comprised of various documents - called Local Development Documents (LDDs) - that will set out policies and proposals to guide future development in the District.

1.2 Gypsies and Travellers Site Allocations Development Plan Document

1.2.1 The Gypsies and Travellers Site Allocations DPD will be a statutory plan to provide specific planning policy and guidance as part of the LDF. This will help to determine planning applications for the provision of Gypsy and Traveller accommodation and identify suitable areas where appropriate sites can be developed.

1.2.2 The timetable for the production of this document, as set out in the Local Development Scheme (2009), can be seen in Table 1.

Table 1: Timetable for the production of the Gypsies and Travellers Site Allocations DPD

Stage of Production Process	Date
Commencement and early stakeholder and community engagement in document preparation	July 2009
Publication of issues and alternative options for consultation	Sept - Nov 2010
Publication of proposed Submission DPD and draft Sustainability Appraisal report	Sept - Nov 2011
Submission to Secretary of State with final Sustainability Appraisal report	March 2012
Pre-examination meeting	May 2012
Commencement of examination	July 2012
Receipt of Inspector's binding report	January 2013
Adoption and publication	April 2013

1.2.3 The DPD will only address the need for permanent pitches. Transit pitches will be addressed at a later date as it is considered "premature to estimate transit needs until adequate long-stay accommodation is available"¹. However, in order to set a broad context of the District for this DPD and any subsequent work, this Scoping Report Addendum will include information on both permanent and transit pitches.

1.2.4 As the needs of Travelling Showpeople differ significantly from those of Gypsies and Travellers², their accommodation requirements will also be

¹ West of England Gypsy and Traveller Accommodation Needs Assessment (Oct 2007)

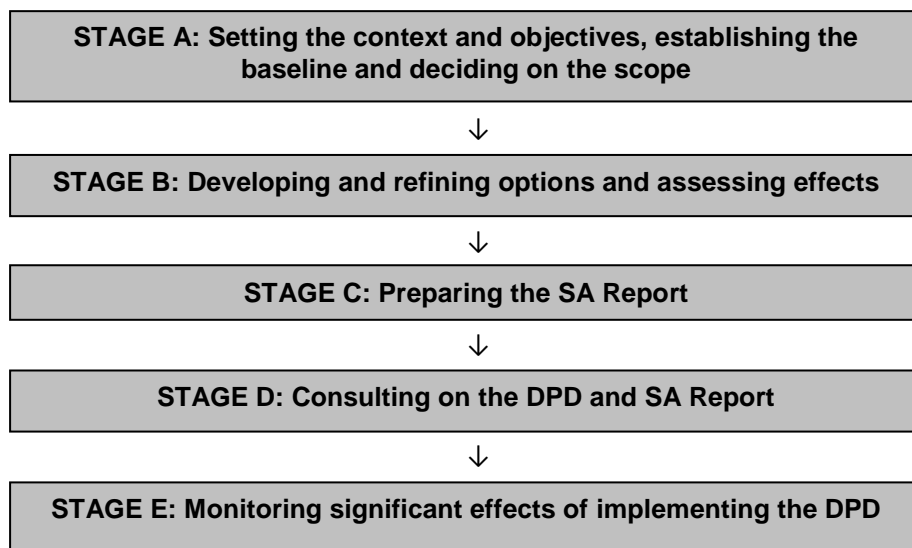
² West of England Gypsy and Traveller Accommodation Needs Assessment (Oct 2007)

addressed at a later date. A separate Scoping Report Addendum will therefore be produced accordingly.

1.3 Sustainability Appraisal Methodology

1.3.1 Sustainability Appraisal (SA) is a systematic process undertaken during the preparation of a plan or strategy, as required by the Planning and Compulsory Purchase Act 2004. The appraisal will assess the extent to which the emerging policies and proposals will reflect relevant environmental, social and economic sustainability objectives. It will identify any adverse effects needing to be addressed and promote areas for achieving sustainability performance.

1.3.2 Government guidance³ on undertaking SA of LDDs presents a five-stage process, each of which contains criteria to fulfil that requirement. These stages are described in the following manner:



1.3.3 The first stage of SA - Stage A - requires the production of a Scoping Report. This comprises five specific tasks:

- Task A1: Identifying other relevant policies, plans, programmes and sustainability objectives
- Task A2: Collecting baseline information
- Task A3: Identifying sustainability issues and problems
- Task A4: Developing the SA framework
- Task A5: Consulting on the scope of the SA

1.3.4 These tasks will form the basis of this report.

1.4 Requirements of the Strategic Environmental Assessment Directive

1.4.1 Preparing a Scoping Report provides the opportunity to incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive⁴. Annex 1 of the SEA Directive lists the information that should be included

³ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

⁴ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

through the SA process, certain elements of which can be provided through the Scoping Report. These requirements are detailed in Table 2.

Table 2: SEA requirements that can be incorporated into the SA Scoping Report

SEA Directive Requirement	Relevant Task within SA Scoping Report
Annex 1(a): An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.	Task A1: Policy Review
Annex 1(b): The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.	Task A2: Collecting Baseline Information
Annex 1(c): The environmental characteristics of areas likely to be significantly affected.	Task A2: Collecting Baseline Information Task A3: Identifying Sustainability Issues
Annex 1(d): Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the 'Birds Directive' (79/409/EEC) and the 'Habitats Directive' (92/43/EEC).	Task A3: Identifying Sustainability Issues
Annex 1(e): The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.	Task A1: Policy Review

1.4.2 These SEA requirements will be incorporated into the relevant sections of this report accordingly.

1.5 This Report

1.5.1 Government guidance⁵ states that one Scoping Report can be produced for several LDDs provided it gives sufficient information for each of the LDDs concerned. This can be achieved by preparing the Scoping Report in two parts: the first part setting out general elements common to all the LDDs in question, and the second part providing more detail specific to individual LDDs.

1.5.2 Bath & North East Somerset Council produced an SA Scoping Report for the Core Strategy and Site Allocations DPDs in June 2007. As this provides general information common to both DPDs, it represents the first stage of scoping outlined above.

1.5.3 This document acts as an Addendum to the Scoping Report for the Core Strategy and Site Allocations DPDs, thereby reflecting the second stage of

⁵ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

scoping outlined above. It contains more detailed information specific to the Gypsies and Travellers Site Allocations DPD.

- 1.5.4 As a result, this Addendum should be read in conjunction with the part one report – the Scoping Report for the Core Strategy and Site Allocations DPDs⁶.

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<http://www.bathnes.gov.uk/BathNES/environmentandplanning/planning/localdevelopmentscheme/Sustainability+Appraisal.htm>

2. Task A1: Policy Review

2.1 Identifying other relevant Policies, Plans and Programmes

2.1.1 The starting point for preparing LDDs is an appraisal of the policy context within which they are being prepared. An initial review of policies, plans and programmes (PPPs) was carried out as part of the Scoping Report for the Core Strategy and Site Allocations DPDs.

2.1.2 This section provides the results of a further review of PPPs relevant to the Gypsies and Travellers Site Allocations DPD. It includes both new PPPs and PPPs which have been updated since the publication of the Scoping Report.

2.1.3 These PPPs are listed below:

National

- Housing Act 2004
- Human Rights Act 1998
- Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000
- Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991
- PPS12: Local Spatial Planning
- PPS5: Planning for the Historic Environment
- PPS4: Planning for Sustainable Economic Growth
- Designing Gypsy and Traveller Sites: Good Practice Guide
- Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers

Regional

- South West Regional Housing Strategy 2005 - 2016

Sub-Regional

- West of England Gypsy and Traveller Accommodation Assessment 2006 - 2016

Local

- Bath & North East Somerset Local Plan including Minerals and Waste Policies (adopted October 2007)
- Bath & North East Somerset Core Strategy Spatial Options Report
- Bath & North East Somerset Corporate Plan 2008 – 2011
- Bath & North East Somerset Draft Housing and Wellbeing Strategy 2010 – 2015
- Bath & North East Somerset Race Equality Scheme 2008 – 2011
- Bath & North East Somerset Strategic Flood Risk Assessment – Level 1 and Level 2
- Bath & North East Somerset Sustainable Community Strategy 2009 - 2026

2.1.4 Details of these PPPs are contained in Appendix A.

2.2 Consultation Question

Question 1	Are there any other policies, plans or programmes relevant to
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	the Gypsies and Travellers Site Allocations DPD that should be reviewed?
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3. Task A2: Collecting Baseline Information

3.1 Methodology

- 3.1.1 The Scoping Report for the Core Strategy and Site Allocations DPDs sets out baseline data for a series of key indicators covering a broad range of topics.
- 3.1.2 Whilst this baseline data is sufficient for the wide scope of the Core Strategy and Site Allocations DPDs, more specific information is needed to assess documents with a much narrower focus such as the Gypsies and Travellers Site Allocations DPD.
- 3.1.3 Specific data relating to Gypsies and Travellers is difficult to determine due to the transient nature of the population. This document will therefore have to rely on the most recent data and trend analysis available. Information from the following sources will therefore be used to supplement the existing baseline:
- The West of England Gypsy and Traveller Accommodation Needs Assessment (GTAA). This was produced in October 2007 and covers the four partner authorities of Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire; and
 - The bi-annual count of Gypsy and Traveller caravans in Bath & North East Somerset. This covers the period July 2007 - July 2009.

3.2 Additional Baseline Information

- 3.2.1 The GTAA estimated that, across the study area, the Gypsy and Traveller population consisted of 1933 individuals in 2007. This equated to approximately 500 Gypsy and Traveller households of which 22 (approximately 90-100 people) were estimated to reside in Bath & North East Somerset. This figure has since fluctuated.
- 3.2.2 In July 2007 there were no authorised sites in the district to accommodate this need. This was still the case in July 2009 (see Appendix B) and indeed remains the case in July 2010. Without the Gypsies and Travellers Site Allocations DPD, this trend would almost certainly continue.
- 3.2.3 As a result of this, a number of unauthorised sites have been established in the district. In July 2009 there were 23 caravans on unauthorised sites, all of which were on Gypsy owned land. In January 2008 and January 2009, however, Gypsies and Travellers also established themselves on land not in their ownership. This information can be seen in Appendix B.
- 3.2.4 The GTAA therefore calculates that, within Bath & North East Somerset, there is a need for:
- 19 permanent pitches between 2006 and 2011 (arising from net movement from housing to sites, unauthorised developments and unauthorised encampments), with a further 3 pitches being needed between 2011 and 2016 (due to household growth); and
 - 20 transit pitches between 2006 and 2011 (with no further pitches being needed by 2016).
- 3.2.5 A summary of this information is provided in Appendix C.

3.3 Consultation Questions

Question 2	Is the baseline data appropriate to the Gypsies and Travellers Site Allocations DPD?
Question 3	Is there any other relevant baseline data that should be included?

4 Task A3: Identifying Sustainability Issues

4.1 Methodology

- 4.1.1 The sustainability issues highlighted in this section are of particular relevance to the Gypsies and Travellers Site Allocations DPD. They have been identified from the review of relevant policies, plans and programmes (see Chapter 2), as well as the additional baseline data (see Chapter 3). They therefore supplement the sustainability issues identified in Chapter 3 of the Scoping Report for the Core Strategy and Site Allocations DPDs.

4.2 Additional Sustainability Issues

- 4.2.1 Table 3 below provides a summary of the additional sustainability issues that have been identified through the review process for this Addendum.

4.3 Consultation Question

Question 4	Have the key sustainability issues been identified?
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Table 3: Summary of the additional sustainability issues identified for the Gypsies and Travellers Site Allocations DPD

Topic Area	Sustainability Issues and Key Considerations	Source of Information
Environmental		
Areas of nature and conservation importance	<ul style="list-style-type: none"> • Sites in areas with nationally recognised designations should only be permitted where the objectives of the designation will not be compromised by the development. These include: <ul style="list-style-type: none"> ➤ Sites of Special Scientific Interest ➤ National Nature Reserves ➤ National Parks ➤ Areas of Outstanding Natural Beauty ➤ Scheduled Monuments ➤ Conservation Areas ➤ Registered Parks and Gardens In the context of Bath & North East Somerset, the World Heritage Site designation should also be added to this list. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
General environmental considerations	<ul style="list-style-type: none"> • Consideration should be given to the provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampments. • Sites should not be located in areas at high risk of flooding, including the functional floodplain, given the particular vulnerability of caravans. • Sites should not be located on significantly contaminated land. • Sites on brownfield, untidy or derelict land can provide an improvement to the environment and increase openness. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)

	<ul style="list-style-type: none"> • Consideration should be given to the potential for noise to and from a site. • Sites must benefit from mains sewerage or appropriate disposal, water provision, waste collection and other utilities that help residents and prevent possible environmental damage from local pollution instances. • Sites in the Green Belt are generally considered inappropriate development. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Designing Gypsy and Traveller Sites – Good Practice Guide (DCLG, 2008) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Social		
Accommodation	<ul style="list-style-type: none"> • Many areas of England have failed to deliver adequate sites for Gypsies and Travellers over the last 10 years. • Around three quarters of the 16,000 Gypsy and Traveller caravans in England are on unauthorised sites. • Bath & North East Somerset has never provided an authorised site for Gypsies and Travellers. • In October 2004, many existing local authority sites were of a poor standard. • The facilities on many older sites are increasingly out of keeping with accepted standards for family living. • There is a very low proportion of council/social site provision in the West of England. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (DCLG, 2007) • West of England Gypsy and Traveller Accommodation Assessment (2007) • Designing Gypsy and Traveller Sites – Good Practice Guide (DCLG, 2008) • Designing Gypsy and Traveller Sites – Good Practice Guide (DCLG, 2008) • West of England Gypsy and Traveller Accommodation Assessment (2007)
Access to services and facilities	<ul style="list-style-type: none"> • Gypsies and Travellers are believed to experience the worst health and education status of any disadvantaged group in England. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)

	<ul style="list-style-type: none"> • Consideration should first be given to the location of sites in or near existing settlements with access to local services (e.g. shops, doctors and schools). • Consideration should be given to the wider benefits of easier access to GP and other health services. • Consideration should be given to children attending school on a regular basis. • Consideration must be given to vehicular access from the public highway, as well as provision for parking, turning and servicing on site, and road safety for occupants and visitors. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Health	<ul style="list-style-type: none"> • Gypsies and Travellers are believed to experience the worst health status of any disadvantaged group in England. • The average life expectancy is lower for Gypsies and Travellers than the settled population (12 years less for women and 10 years less for men). • Of Gypsy and Traveller mothers, 17.6% have experienced the death of a child compared to 0.9% in the settled population. • Chest pain, respiratory problems and arthritis are more prevalent than in the settled community. • Travellers exhibit high child accident rates associated with instability of sites and lack of access to healthcare. • The existence of disability is significantly higher than 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (DCLG, 2007) • Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (DCLG, 2007) • West of England Gypsy and Traveller Accommodation Assessment (2007) • West of England Gypsy and Traveller Accommodation Assessment (2007) • West of England Gypsy and Traveller

	<p>in the 'mainstream' population.</p> <ul style="list-style-type: none"> • The impact of increased evictions, restricted access to healthcare and education, an increase in unsafe conditions on roadside sites, and a breakdown of social and community support networks all have a significant effect on health. • Consideration should be given to the wider benefits of easier access to GP and other health services. 	<p>Accommodation Assessment (2007)</p> <ul style="list-style-type: none"> • West of England Gypsy and Traveller Accommodation Assessment (2007) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Education	<ul style="list-style-type: none"> • Gypsies and Travellers are believed to experience the worst education status of any disadvantaged group in England. • At GCSE level in 2005, 22.5% of Irish Traveller pupils and 14.7% of Gypsy/Roma pupils achieved 5+ A*-C grades in contrast to a national average for all pupils of 54.9%. • As many as 12,000 Gypsy and Traveller children are not registered with a school. • Consideration should be given to children attending school on a regular basis. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • West of England Gypsy and Traveller Accommodation Assessment (2007) • West of England Gypsy and Traveller Accommodation Assessment (2007) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Proximity to family	<ul style="list-style-type: none"> • Some communities of Gypsies and Travellers live in extended family groups and often travel as such. This is a key feature of their traditional way of life that has an impact on planning for their accommodation needs. 	<ul style="list-style-type: none"> • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Relations with settled communities	<ul style="list-style-type: none"> • Gypsies and Travellers are often isolated both geographically and socially. • The increasing number of unauthorised developments 	<ul style="list-style-type: none"> • Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (DCLG, 2007) • Designing Gypsy and Traveller Sites –

	<p>/ encampments has sometimes created tensions between Gypsies and Travellers and the settled community.</p> <ul style="list-style-type: none"> • Incidents of racism and a feeling of isolation can make it difficult for Gypsies and Travellers to integrate into the wider community. • Sites should respect the scale of, and not dominate the nearest settled community. • Consideration should be given to the promotion of peaceful and integrated co-existence between the site and the local community. • Efforts should be made to ensure that noise, vehicular movements and other activities on site cause minimal disturbance to the settled community. • Enclosing a site with too much hard landscaping, high walls or fences can give the impression of deliberately isolating the site and its occupants from the rest of the community, and should be avoided. • Conflict, distress and anti-social behaviour are often associated with unauthorised sites. 	<p>Good Practice Guide (DCLG, 2008)</p> <ul style="list-style-type: none"> • West of England Gypsy and Traveller Accommodation Assessment (2007) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)
Economic		
Access to the workplace	<ul style="list-style-type: none"> • Types of work have changed over the years, with a decline in traditional work contributing to severe economic disadvantage and social exclusion. • There is a need to provide sites in locations that meet the current working patterns of Gypsies and Travellers. 	<ul style="list-style-type: none"> • West of England Gypsy and Traveller Accommodation Assessment (2007) • Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites (ODPM, 2006)

5 Task A4: Developing the Sustainability Appraisal Framework

5.1 Establishing the Sustainability Appraisal Objectives

- 5.1.1 The SA Framework provides a way in which sustainability effects can be described, analysed and compared. The process of undertaking SA involves the identification of sustainability objectives which are used to measure and monitor the success of policies and proposals.
- 5.1.2 The Scoping Report for the Core Strategy and Site Allocations DPDs identified 21 sustainability objectives. These objectives were, however, revised in response to comments received from the statutory consultees. The 20 updated sustainability objectives can therefore be seen in Table 4 below.
- 5.1.3 It is considered that these objectives, which have undergone previous consultation, adequately cover the scope of the Gypsies and Travellers Site Allocations DPD. As such, it is not proposed to change or add to them.
- 5.1.4 These objectives will therefore be used to assess the relative performance of each option put forward in the DPD. Possible mitigation measures will be proposed in Stage B of the Sustainability Appraisal process.

5.2 Consultation Question

Question 5	Do you have any comments on the Sustainability Appraisal objectives?
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Table 4: Sustainability Objectives

SA/SEA Objectives	Detailed questions: Does the policy / proposal...	Topic Area to be Addressed (from Table 3)
Objective 1: Improve accessibility to community facilities and local services	<ul style="list-style-type: none"> • Improve accessibility to community facilities and local services? 	<ul style="list-style-type: none"> • Access to services and facilities
Objective 2: Improve the health and wellbeing of all communities	<ul style="list-style-type: none"> • Reduce health inequalities? • Reduce mortality rates? 	<ul style="list-style-type: none"> • Health
Objective 3: Meet identified needs for sufficient, high quality and affordable housing	<ul style="list-style-type: none"> • Help meet the accommodation needs of all sectors of the community? • Help make housing affordable for all sectors of the community? 	<ul style="list-style-type: none"> • Accommodation • Proximity to family
Objective 4: Promote stronger more <i>vibrant and</i> cohesive communities	<ul style="list-style-type: none"> • Promote stronger more cohesive communities? • Reduce social exclusion? 	<ul style="list-style-type: none"> • Relations with settled communities • Proximity to family
Objective 5: Reduce anti-social behaviour, crime and the fear of crime	<ul style="list-style-type: none"> • Reduce crime and fear of crime? 	<ul style="list-style-type: none"> • Relations with settled communities
Objective 6: Improve the availability and provision of training	<ul style="list-style-type: none"> • Give everyone access to learning, training, skills and knowledge? 	<ul style="list-style-type: none"> • Education
Objective 7: Ensure communities have access to a wide range of employment opportunities, paid or unpaid	<ul style="list-style-type: none"> • Give all sectors of the community access to satisfying work opportunities, paid or unpaid? • Reduce poverty and income inequality? 	<ul style="list-style-type: none"> • Access to the workplace
Objective 8: Enable local businesses to prosper	<ul style="list-style-type: none"> • Increase the circulation of wealth within the local authority area? 	<ul style="list-style-type: none"> • Education • Access to the workplace
Objective 9: Increase availability of local produce and materials	<ul style="list-style-type: none"> • Meet local needs locally? 	<ul style="list-style-type: none"> • Access to services and facilities
Objective 10: Ensure everyone has access to high quality and affordable public transport and promote cycling and walking	<ul style="list-style-type: none"> • Make public transport, cycling and walking easier and more attractive? 	<ul style="list-style-type: none"> • Access to services and facilities • Health
Objective 11: Reduce the need and desire to travel by car	<ul style="list-style-type: none"> • Reduce the need/desire to travel by car? 	<ul style="list-style-type: none"> • Access to services and facilities
Objective 12: Protect and enhance local distinctiveness	<ul style="list-style-type: none"> • Protect and enhance landscape and townscape? • Value and protect diversity and local distinctiveness including rural ways of life? 	<ul style="list-style-type: none"> • Relations with settled communities • General environmental considerations

Objective 13: Protect and enhance the district's historic, environmental and cultural assets	<ul style="list-style-type: none"> • Maintain and enhance cultural and historical assets? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 14: Encourage and protect habitats and biodiversity (taking account of climate change)	<ul style="list-style-type: none"> • Protect and enhance habitats and species (taking account of climate change)? 	<ul style="list-style-type: none"> • Areas of nature and conservation importance
Objective 15: Reduce land, water, air, light and noise pollution	<ul style="list-style-type: none"> • Minimise land, water, air, light and noise pollution? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 16: Encourage sustainable construction	<ul style="list-style-type: none"> • Provide development that demonstrates sustainable design and construction? • Reduce waste not put to any use? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 17: Ensure the development of sustainable and/or local energy sources and energy infrastructure	<ul style="list-style-type: none"> • Reduce non-renewable energy consumption and 'greenhouse' emissions? • Promote sustainable energy generation and distribution? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 18: Reduce vulnerability to, and manage flood risk (taking account of climate change)	<ul style="list-style-type: none"> • Reduce vulnerability to, and manage flood risk (taking account of climate change)? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 19: Encourage careful and efficient use of natural resources	<ul style="list-style-type: none"> • Promote the conservation and wise use of land? • Keep water consumption within local carrying capacity limits (taking account of climate change)? 	<ul style="list-style-type: none"> • General environmental considerations
Objective 20: Promote waste management in accordance with the waste hierarchy (reduce, reuse and recycle)	<ul style="list-style-type: none"> • Reduce waste not put to any use? 	<ul style="list-style-type: none"> • General environmental considerations

6 Task A5: Consulting on the Scope of the Sustainability Appraisal

- 6.1 This report acts as an Addendum to the Scoping Report for the Core Strategy and Site Allocations DPDs. It therefore contains additional information to that previously consulted upon.
- 6.2 Consultation on this Addendum will therefore be undertaken with the following statutory bodies⁷:
- Environment Agency
 - English Heritage
 - Natural England (formerly the Countryside Agency and English Nature)
- 6.3 Consultation will also be undertaken with the following bodies, all of which are considered to have an interest in the document:
- Bristol City Council
 - Mendip District Council
 - North Somerset Council
 - Somerset County Council
 - South Gloucestershire Council
 - Wiltshire County Council
 - Government Office for the South West

 - Advisory Council for the Education of Romany and Other Travellers
 - Equality and Human Rights Commission
 - Friends, Families and Travellers
 - Irish Travellers Movement in Britain
 - National Association of Teachers of Travellers and Other Professionals
 - National Travellers Action Group
 - The Gypsy and Traveller Law Reform Coalition
 - The Gypsy Council for Education, Culture, Welfare and Civil Rights
 - The Gypsy Council
- 6.4 Wider consultation with stakeholders will take place when the draft Sustainability Appraisal Report is published alongside the draft Gypsies and Travellers Site Allocations DPD.
- 6.5 Comments can be made on this document between **Monday 19th July 2010 and Friday 27th August 2010.**
- 6.6 All comments should be sent to:
- Planning Policy
Bath & North East Somerset Council
Trimbridge House
Trim Street
Bath
BA1 2DP
- or emailed to: planning_policy@bathnes.gov.uk

⁷ As listed in the Sustainability Appraisal of Regional Spatial Strategies & Local Development Documents (ODPM, 2005)

6.7 Comments made should be in response to the following consultation questions:

Question 1	Are there any other policies, plans or programmes relevant to the Gypsies and Travellers Site Allocations DPD that should be reviewed?
Question 2	Is the baseline data appropriate to the Gypsies and Travellers Site Allocations DPD?
Question 3	Is there any other relevant baseline data that should be included?
Question 4	Have the key sustainability issues been identified?
Question 5	Do you have any comments on the Sustainability Appraisal objectives?

6.8 The Council will document and take into account any comments made within the consultation period.

6.9 Following this, the Scoping Report and Addendum will be used as a basis for undertaking the Sustainability Appraisal of the Gypsies and Travellers Site Allocations DPD.

APPENDIX A: REVIEW OF RELEVANT POLICIES, PLANS AND PROGRAMMES

Title of Document	Overall Aim / Purpose of Document	Key Objectives, Targets and Indicators relevant to the Plan and SA
National		
Housing Act 2004	Imposes a duty on local housing authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers in their district when undertaking a review of housing need.	s.225(1) Duty of local authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers. s.225(2) Duty of local authorities to prepare of strategy in respect of meeting the accommodation needs.
Human Rights Act 1998	Sets out the fundamental human rights which government and public authorities are legally obliged to respect.	Several Articles within the Act are relevant to Gypsies and Travellers including: <ul style="list-style-type: none"> • Article 1 - Every person is entitled to the peaceful enjoyment of their possessions and shall not be deprived of these; and • Article 8 - Everyone has the right to respect for their private life, family and home.
Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000	Places a duty on public authorities to eliminate unlawful discrimination and promote equal opportunities and good race relations. Case law established Gypsies as a recognised ethnic group in England in 1989 and Irish Travellers in 2000.	s.19B(1) Makes it unlawful for a public authority to discriminate against a person on race grounds in carrying out any of its functions. s.71(1) Imposes a general duty on public authorities to have due regard to the need to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups.
Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991	Gives local planning authorities a number of powers including the issuing of enforcement notices to remedy a specified breach of rules.	s.172 Local authorities may issue a notice where it appears to them there has been a breach of planning control.
PPS12: Local Spatial Planning (DCLG, 2008)	Explains what local spatial planning is and sets out the Government's policy on the preparation of Local Development Frameworks.	Spatial planning aims to: <ul style="list-style-type: none"> • produce a vision for the future of places that responds to the local challenges and opportunities, and is based on evidence, a sense of local distinctiveness and community derived objectives, within the overall framework of national policy and regional strategies;

		<ul style="list-style-type: none"> • translate this vision into a set of priorities, programmes, policies and land allocations together with the public sector resources to deliver them; • create a framework for private investment and regeneration that promotes economic, environmental and social well being for the area; • coordinate and deliver the public sector components of this vision with other agencies and processes; • create a positive framework for action on climate change; and • contribute to the achievement of Sustainable Development.
PPS5: Planning for the Historic Environment (DCLG, 2010)	Sets out the Government's planning policies on the conservation of the historic environment.	<p>Objectives are:</p> <ul style="list-style-type: none"> • to deliver sustainable development by ensuring that policies and decisions concerning the historic environment: <ul style="list-style-type: none"> ➢ recognise that heritage assets are a non-renewable resource; ➢ take account of the wider social, cultural, economic and environmental benefits of heritage conservation; and ➢ recognise that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. • to conserve England's heritage assets in a manner appropriate to their significance by ensuring that: <ul style="list-style-type: none"> ➢ decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset; ➢ wherever possible, heritage assets are put to an appropriate and viable use that is consistent with their conservation; ➢ the positive contribution of such heritage assets to local character and sense of place is recognised and valued; and ➢ consideration of the historic environment is integrated into planning policies, promoting place-shaping. • to contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available, particularly where a heritage asset is to be lost.
PPS4: Planning for Sustainable Economic	Sets out the Government's comprehensive policy framework for planning for sustainable economic	<p>Objectives are to:</p> <ul style="list-style-type: none"> • build prosperous communities by improving the economic performance of

Growth (DCLG, 2009)	development in urban and rural areas.	<p>cities, towns, regions, sub-regions and local areas, both urban and rural;</p> <ul style="list-style-type: none"> • reduce the gap in economic growth rates between regions, promoting regeneration and tackling deprivation; • deliver more sustainable patterns of development, reduce the need to travel, especially by car and respond to climate change; • promote the vitality and viability of town and other centres as important places for communities; and • raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural communities whilst continuing to protect the open countryside for the benefit of all.
Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008)	Aims to provide guidance on the key elements necessary to design a successful Gypsy and Traveller site.	<p>It should be ensured that sites are:</p> <ul style="list-style-type: none"> • sustainable, safe and easy to manage and maintain; • of a decent standard, equitable to that which would be expected for social housing in the settled community; and • able to support harmonious relations between Gypsies and Travellers and the settled community.
Local Authorities and Gypsies and Travellers: A Guide to Responsibilities and Powers (DCLG, 2007)	Sets out what needs to be done to ensure more effective enforcement alongside the provision of more authorised sites.	<p>States that decent homes are a key element of any thriving, sustainable community. This means:</p> <ul style="list-style-type: none"> • adequate provision must be made for authorised sites: at the moment there are no authorised pitches available for a quarter of caravans; • the planning system and property rights must be respected and effective enforcement action must be taken promptly against problem Gypsy and Traveller sites; and • the small minority of people, whether Gypsies and Travellers or members of the local settled community, who indulge in anti-social behaviour must be dealt with promptly and effectively before they cause further harm to relationships between the two communities.
Regional		
South West Regional Housing Strategy 2005 - 2016	Identifies ways to tackle the under-provision of housing (against evidence of increasing housing demand and need for affordable housing), and supports the delivery of "The Way Ahead" - the	<p>Aims to:</p> <ul style="list-style-type: none"> • Improve the balance of housing markets: <ul style="list-style-type: none"> ➢ To develop housing markets with a range of tenures, which improve the balance between supply and demand, and offer everyone the

	region's proposals for delivering planned growth and new housing in the most strategically important places on an accelerated time-scale.	<p>opportunity to access a home at a price they can afford.</p> <ul style="list-style-type: none"> • Achieve good quality homes: <ul style="list-style-type: none"> ➤ To ensure that existing and new homes improve over minimum standards of quality, management and design. • Support sustainable communities: <ul style="list-style-type: none"> ➤ To ensure that housing makes a full contribution to the achievement of sustainable and inclusive communities.
Sub-Regional		
West of England Gypsy and Traveller Accommodation Assessment (GTAA) 2006 – 2016	Assesses the accommodation needs of Gypsies and Travellers in the four West of England authorities of Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire (in accordance with the Housing Act 2004).	<p>Calculates that the district should make provision for the following:</p> <ul style="list-style-type: none"> • 19 residential pitches between 2006 and 2011 (with a further 3 pitches needed between 2011 and 2016); and • 20 transit pitches between 2006 and 2011 (with no further pitches needed between 2011 and 2016).
Local		
Bath & North East Somerset Local Plan including Minerals and Waste Policies (adopted Oct 2007)	Sets out policies which guide how and where development should take place in the district up to 2011.	<p>Policy HG.16 sets out the current policy on Gypsies and Travellers. Key considerations for the assessment of sites include:</p> <ul style="list-style-type: none"> • Good access to local services, facilities and public transport; • Safe and convenient access to the road network; • Capable of being landscaped to ensure it blends in with its surroundings; • Adequate services including foul and surface water drainage and waste disposal; and • No harmful impact on the amenities of local residents.
Bath & North East Somerset Core Strategy Spatial Options Report (Oct 2009)	Sets out a suggested Spatial Vision, Strategic Objectives, Spatial Strategy and Core Policies for Bath & North East Somerset. All subsequent DPDs must be in conformity with the Core Strategy.	<p>The proposed policy framework for Gypsies and Travellers sets out that the identification of suitable sites should:</p> <ul style="list-style-type: none"> • Consider the appropriateness of developing in the Green Belt and the affect on areas that have nationally recognised designations; • Minimise the impact on local areas as well as improving relationships with permanent local communities; • Consider the proximity to shops, schools and health facilities by public transport, on foot or by cycle; • Make sure there is space for parking, turning and servicing of vehicles and also enough space for storing and maintaining equipment;

		<ul style="list-style-type: none"> • Make sure that vehicles are able to access the public highway without causing traffic congestion or issues with safety; • Look at the issues of nuisance, safety and amenities and also the potential impact on climate change; • Consider the availability of essential services, such as water, sewerage and drainage and waste disposal facilities; • Make sure that the landscape design offers privacy and also minimises the impact on the surrounding area; • Consider the impact on the local environment and the character of the area; and • Avoid areas at high risk from flooding.
Bath & North East Somerset Corporate Plan 2008-2011	Sets out the improvement priorities for the Council and priority actions to address them to 2011. It represents the Council's high level strategic plan and encapsulates the activity that will contribute to the achievement of the Sustainable Community Strategy and the Local Area Agreement.	<p>The Council's improvement priorities for the next three years are:</p> <ul style="list-style-type: none"> • Improving transport and the public realm • Building communities where people feel safe and secure • Addressing the causes and effects of climate change • Improving the availability of affordable housing • Promoting the independence of older people • Improving the life chances of disadvantaged children and young people • Improving school buildings • Sustainable growth
Bath & North East Somerset Draft Housing and Wellbeing Strategy 2010 - 2015	Sets out the local authority's strategic housing ambition and presents a five year plan of how housing needs can be met.	<p>Identifies six priorities:</p> <ul style="list-style-type: none"> • To be well informed about the strategic housing needs of a growing and changing population and to prioritise services; • To tackle fuel poverty and climate change by making homes warmer and more energy efficient; • To improve access to existing affordable housing by matching people to homes; • To increase the supply of new affordable housing; • To make homes safer and healthier; and • To reduce inequalities by meeting housing needs. <p>The latter includes developing the recommendations of the Gypsies &</p>

		Travellers Accommodation Assessment and enabling the provision of recommended pitches and infrastructure when their locations have been identified.
Bath & North East Somerset Race Equality Scheme 2008-2011	Sets out what steps the Council will take to: <ul style="list-style-type: none"> • eliminate unlawful discrimination; • promote equality of opportunity between different racial groups; and • promote good relations between persons of different racial groups. 	Bath and North East Somerset Council is committed to equality of opportunity for the whole community and believes that the diversity of the community is a major strength which contributes to the social and economic prosperity of the area. The Council commits to ensure that no resident of, or visitor to the area, job applicant, employee or other person associated with the Council is treated inequitably or in an unlawful or unjustifiably discriminatory manner. The Council therefore believes: <ul style="list-style-type: none"> • in a fair society that offers everyone an equal chance to learn, work and live free from discrimination, harassment and prejudice; • that the diversity of the community is an asset to Bath & North East Somerset; • in fighting against discrimination
Bath & North East Somerset Strategic Flood Risk Assessment: <ul style="list-style-type: none"> • Level 1 (April 2008) • Level 2 (July 2009) 	Provides essential information for the allocation of land for development and the control of development in order to limit flood risk to people and property where possible and manage it elsewhere. It provides the information needed to apply the sequential risk-based approach required in PPS25.	Main objectives are to provide information: <ul style="list-style-type: none"> • so that an evidence based and risk based sequential approach can be adopted when making planning decisions (in line with PPS25) • that is strategic and covers a wide spatial area • that looks at flood risk today and in the future • that supports sustainability appraisals of LDFs • that identifies what further investigations may be required in flood risk assessments for specific development proposals
Bath & North East Somerset Sustainable Community Strategy 2009-2026	Outlines a long term vision for the area, until 2026, including an overview of the issues that will need to be overcome in order to achieve the aspirations.	The vision ensures that the following are created: <ul style="list-style-type: none"> • A distinctive place that: <ul style="list-style-type: none"> ➢ Maintains and enhances its outstanding built and natural environment ➢ Has a dynamic, low carbon economy ➢ Achieves connectivity ➢ Has world class arts and culture • Vibrant sustainable communities:

		<ul style="list-style-type: none">➤ That are lively and inclusive➤ Places where people feel safe, take responsibility and make a contribution➤ That are carbon neutral➤ Where the disadvantaged are supported➤ Where the vulnerable are protected➤ Where people feel proud to live• Communities where everyone fulfils their potential by having an equal opportunity to:<ul style="list-style-type: none">➤ Learn and develop skills➤ Enjoy a healthy, low carbon lifestyle➤ Influence the future of their area➤ Contribute to the economy and society
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APPENDIX B: COUNT OF GYPSY AND TRAVELLER CARAVANS IN BATH & NORTH EAST SOMERSET (JULY 07 – JULY 09)

	Authorised Sites		Unauthorised Sites				Total All Caravans
	No of Caravans		No of Caravans on Sites on Gypsies own land (unauthorised development)		No of Caravans on Sites on land not owned by Gypsies (unauthorised encampment)		
	Socially Rented	Private	Tolerated	Not Tolerated	Tolerated	Not Tolerated	
Jul 2009	0	0	17	6	0	0	23
Jan 2009	0	0	17	1	21	0	39
Jul 2008	0	0	0	17	0	0	17
Jan 2008	0	0	0	6	78	0	84
Jul 2007	0	0	39	5	0	0	44

(Source: DCLG Count of Gypsy and Traveller Caravans)

We note that these figures do not distinguish between Gypsies and Travellers.

APPENDIX C: BASELINE INFORMATION

Baseline Data	Quantified Information	Comparators or Targets	Trend and Notes	Reference
Gypsy and Traveller Sites	<p>July 2009 Caravan Count</p> <p><u>Authorised Sites (with planning permission)</u> No of caravans:</p> <ul style="list-style-type: none"> socially rented: 0 private: 0 <p><u>Unauthorised Sites (without planning permission)</u> No of caravans on sites on Gypsies own land:</p> <ul style="list-style-type: none"> tolerated: 17 not tolerated: 6 <p>No of caravans on sites on land not owned by Gypsies:</p> <ul style="list-style-type: none"> tolerated: 0 not tolerated: 0 <p>Total All Caravans: 23</p>	<p>Total All Caravans in other West of England UAs at July 2009</p> <p>Bristol</p> <ul style="list-style-type: none"> authorised: 10 unauthorised: 1 <p>North Somerset</p> <ul style="list-style-type: none"> authorised: 62 unauthorised: 28 <p>South Gloucestershire</p> <ul style="list-style-type: none"> authorised: 206 unauthorised: 54 	<p>Historically there has been a statistically low level of demand for Gypsy and Traveller sites with some unauthorised occupation of land by Gypsies and Travellers within the district.</p>	<p>DCLG Count of Gypsy and Traveller Caravans: July 2007 – July 2009</p>
	<p>West of England Gypsy and Traveller Accommodation Assessment (Oct 2007)</p> <p><u>No of Permanent Pitches Required</u></p> <ul style="list-style-type: none"> 2006-2011: 19 2011-2016: 3 <p><u>No of Transit Pitches Required</u></p> <ul style="list-style-type: none"> 2006-2011: 20 2011-2016: 0 	<p>No of pitches required in other West of England UAs</p> <p>Bristol</p> <ul style="list-style-type: none"> Permanent 2006-11: 24 Permanent 2011-16: 6 Transit 2006-11: 20 Transit 2011-16: 0 <p>North Somerset</p> <ul style="list-style-type: none"> Permanent 2006-11: 36 Permanent 2011-16: 13 Transit 2006-11: 10 Transit 2011-16: 0 <p>South Gloucestershire</p> <ul style="list-style-type: none"> Permanent 2006-11: 47 	<p>As above.</p>	<p>West of England Gypsy and Traveller Accommodation Assessment (Oct 2007)</p>

		<ul style="list-style-type: none">• Permanent 2011-16: 22• Transit 2006-11: 25• Transit 2011-16: 0		
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