

**Gypsies, Travellers and Travelling Showpeople  
Site Allocations Development Plan Document (DPD)  
Issues and Options Consultation and Call for Sites**

**Statement of Consultation**

February 2012

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## **1.0 Introduction**

- 1.1 This report sets out the activities that took place in the lead up to and during public consultation over the period July – November 2011 (pre-consultation) and 21 November 2011 – 16 January 2012 (formal public consultation) for the Bath and North East Somerset Council Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD).
- 1.2 The consultation document was entitled Issues and Options Paper and included a Call for Sites, seeking feedback on land with potential for allocation as a Gypsy, Traveller or Travelling Showpeople site.
- 1.3 The Issues and Options Paper made no statement of intent and no decisions had been made against or in favour of any possible sites at this stage of progressing the DPD. Once the criteria for site selection have been finalised following the results of this first consultation a second public consultation will take place specifically to look at preferred site options for Gypsy, Traveller and Travelling Showpeople sites that meet those identified criteria.
- 1.4 The purpose of the public consultation was to:
  - a. discuss the issues around providing new sites for Gypsies, Travellers and Travelling Showpeople;
  - b. finalise a method for assessing what makes a viable location for new sites;
  - c. invite land to be put forward to be considered as possible new sites.
- 1.5 Bath and North East Somerset Council's Statement of Community Involvement was adopted in 2007 and was amended and updated in 2010. This identifies the broad opportunities for community involvement in the preparation of development plan documents (SCI, p. 14):
  - Pre-production consultation to establish issues and options
  - Preferred Options consultation
  - Draft DPD submitted to the Secretary of State with 6 week statutory consultation
  - Examination by Planning Inspector
- 1.6 The formal consultation carried out between 21 November 2011 and 16 January 2012 presented the evidence gathered to that point in relation to the Gypsy, Traveller and Travelling Showpeople community in Bath and North East Somerset. It gave an opportunity for early community involvement in identifying the main areas that need to be addressed in the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD and forms part of the informal consultation required when developing a DPD. The issues raised through the first stage of consultation will be used to develop the preferred options for site allocations to be consulted on at the next stage of the DPD, the Options consultation.

## 2.0 Consultation Methodology

2.1 The Bath and North East Somerset Statement of Community Involvement (SCI) identifies three categories of consultation that should be considered in the progression of DPDs:

- Information
- Consultation
- Participation

2.2 For the Issues and Options public consultation the following methods of community engagement were used:

### *Existing networks*

- Parish and town councils – Parish Liaison Group
- Informal Cabinet, Cabinet and Full Council

### *Awareness raising*

- Press and media
- Dedicated webpages
- Written material (posters, leaflets)
- Display panels
- Direct mail / email
- Officer training
- Direct contact

### *Direct Involvement*

- Drop-in events
- Response forms
- Consultation
- Face-to-Face discussion with Gypsy and Traveller community

2.3 The main focus of the consultation was the main consultation document which was accompanied by an informational leaflet and poster. These were made available at all deposit stations and are available to view on the dedicated Planning Policy Local Development Framework webpages: [www.bathnes.gov.uk/planningfortravellers](http://www.bathnes.gov.uk/planningfortravellers)

2.4 Also accompanying the main consultation document were two response forms. The first reproduced the questions set out within the main document which sought views on the issues raised (see Appendix A); the second is a site response form to be used to set out information on land with potential for allocation as a Gypsy, Traveller or Travelling Showpeople site (see Appendix B). Full details of the consultation methods used at the first stage of consultation are set out in Section 3.

### 3.0 Stakeholder Engagement Details

What	Purpose and availability to public	Copy available at
Awareness Raising (pre- and during formal consultation period)		
Email correspondence	<p>Email contact was made with a number of local companies known to work with travelling communities and community representative groups to make them aware of the forthcoming consultation. This included, for example, the Bath and North East Somerset Racial Equality Council. Each person / group was asked to notify any persons who may be interested in the consultation.</p> <p>Further email correspondence was made with the other West of England local authorities (Bristol City Council, South Gloucestershire Council and North Somerset Council) as well as Wiltshire Council to notify them of the forthcoming consultation. They were asked to notify their communities of this to ensure maximum dissemination of information beyond the Bath and North East Somerset (B&amp;NES) District boundary. This in particular was thought to assist in reaching members of the travelling communities not present in B&amp;NES over the formal period of consultation.</p>	
Parish Liaison Group	Officers attended a Parish Liaison Group meeting on 19 October 2011 at which the draft consultation document was introduced. This meeting is attended by representatives of all Parish Councils from across the District. The Divisional Director answered a number of questions concerning the number of pitches that were to be provided by the DPD and how that provision would impact on the level of unauthorised encampments and developments across the District in the future.	A copy of the Briefing Note made available to all Councillors at that meeting is included at Appendix C.
Site visits & direct contact	<p>To familiarise Officers with existing known unauthorised sites across the District site visits were undertaken on 29 September 2011. Further site visits were undertaken on 29 November 2011 at which Officers met with members of the travelling communities and discussed the consultation.</p> <p>Officers also met with a local Traveller who contacted the Council about the DPD (telephone conversation, September 2011). Consultation materials were passed on at a face to face meeting at which the detail of the consultation was discussed (November 2011).</p>	
Training	The lead planning policy Officer attended a training day and the oral hearing of <i>Planning for Traveller Sites</i> at which information about the forthcoming consultation was shared with other local authority officers and members of the South West travelling communities (September 2011).	

Summary leaflet	Made available at all public consultation events and to individuals during direct contact with the local travelling communit(ies).	Included at Appendix D.
Consultation Issues and Options document	<p>An early draft of the main consultation document was made available for internal consultation to select Officers across the Council for comment. Drafts were also made available to Councillors at various committees at which comments were invited:</p> <p>LDF Steering Group, 6 October 2011  Informal Cabinet, 7 October 2011  Strategic Directors Group, 10 October 2011  Parish Liaison Group (as above, 19 October 2011)  PT&amp;E, 8 November 2011  Cabinet, 9 November 2011  Council, 10 November 2011</p> <p>The Gypsy and Traveller Corporate Group were also given a verbal update on the progress of the DPD on 15 September 2011. Changes were made to the consultation document where in accordance with national planning guidance.</p>	Cabinet and Council papers available on Council's website: <a href="http://www.bathnes.gov.uk">www.bathnes.gov.uk</a>
Press coverage	<p>A press release was issued on 23 November 2011.</p> <p>A number of press articles were identified over the consultation period:</p> <p>The Bath Chronicle, Thursday 17 November 2011  Somerset Guardian, Thursday 17 November 2011</p> <p>Including those posted online:</p> <p>Bath and North East Somerset Conservative Group, 11 November 2011  NOW Bath, 24 November 2011  This is Bath, 28 November 2011</p>	Included at Appendix E.

Radio coverage	<p>The consultation was covered on the following radio stations during the consultation period:</p> <p>BBC Somerset Breakfast (radio interview with Cabinet Member Tim Ball on 24 November 2011)  BBC Radio Bristol  Breeze FM</p>	
Website	<p>Dedicated webpages with a shortlink url <a href="http://www.bathnes.gov.uk/planningfortravellers">www.bathnes.gov.uk/planningfortravellers</a> were created setting out the background evidence to the DPD, the planning policy and legal context and all information relating to the public consultation. This listed all methods of reaching the Planning Policy Team, including the main email address and telephone number. This information was published on 18 November 2011.</p> <p>Information on the public consultation was also advertised on the main Council website homepage <a href="http://www.bathnes.gov.uk">www.bathnes.gov.uk</a> and via Twitter on 28 November 2011.</p>	<p>As at <a href="http://www.bathnes.gov.uk/planningfortravellers">www.bathnes.gov.uk/planningfortravellers</a></p>
Letters and emails	<p>These were sent out to those individuals and companies already on the Council's Local Development Framework database. Letters and emails asked that those persons wishing to be notified of future consultations on this issue to contact the Planning Policy Team.</p> <p>All statutory consultees were notified by letter, including a copy of the consultation document. Local Parish Councils also received a poster each to be displayed in community noticeboards.</p>	<p>Included at Appendix F.</p>
LDF Newsletter	<p>This newsletter was published on the Council's Local Development Framework webpages in December 2011. This sought to keep the public updated with ongoing and forthcoming Planning Policy work and activities.</p>	<p>Extract included at Appendix G.</p>



Existing Networks (pre- and during formal consultation period)																
Deposit Stations	<p>The following deposit stations:</p> <table border="0"> <tr> <td>The Guildhall, Bath</td> <td>The Hollies, Midsomer Norton</td> </tr> <tr> <td>Riverside, Keynsham</td> <td>Mobile Library 1</td> </tr> <tr> <td>Mobile Library 2</td> <td>Saltford Library</td> </tr> <tr> <td>Paulton Library</td> <td>Bath Central Library</td> </tr> <tr> <td>Radstock Library</td> <td>Moorland Road Library</td> </tr> <tr> <td>Weston Library</td> <td>Midsomer Norton Library</td> </tr> <tr> <td>Keynsham Library</td> <td></td> </tr> </table> <p>each received:</p> <ul style="list-style-type: none"> <li>• 1x consultation document</li> <li>• 2x response form</li> <li>• 2x call for sites response form</li> <li>• 1x poster</li> </ul> <p>Midsomer Norton Library also received an additional poster advertising the drop-in event taking place there on 6 December 2011.</p>	The Guildhall, Bath	The Hollies, Midsomer Norton	Riverside, Keynsham	Mobile Library 1	Mobile Library 2	Saltford Library	Paulton Library	Bath Central Library	Radstock Library	Moorland Road Library	Weston Library	Midsomer Norton Library	Keynsham Library		<p>All information available at:  <a href="http://www.bathnes.gov.uk/planningfortravellers">www.bathnes.gov.uk/planningfortravellers</a></p>
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Town and Parish Councils	Town and parish councils were contacted directly by letter and asked to display a poster about the consultation. A copy of the main consultation document was also enclosed with that letter.	Included at Appendix F.														
Officer training	Internal officer training was run to provide all Planning Policy Team members with the background knowledge and understanding of a brief history of the travelling communities, the planning policy and legal framework to site provision, the local Bath and North East Somerset context and the contents of the consultation document.															
Member engagement	The lead Officer held several informal discussions with Councillors wanting to learn more about the background to travelling communities and the DPD.															

Direct Involvement (during formal consultation period)		
Site visits	<p>As the key target group and stakeholder of the Site Allocations DPD engagement with the local travelling communit(ies) was a focus of the consultation strategy.</p> <p>As a stakeholder that is typically difficult to engage with a major concern of the consultation process was to engage directly with the travelling communit(ies). It was likely that members of those communities would not attend the planned drop-in events, and less likely to self-identify at those events to engage with Officers.</p> <p>To ensure those communities were included and their views sought at an early stage of the development of the document all known existing unauthorised sites were visited by Officers. The purpose of those visits was to both raise awareness of the consultation within the communit(ies) and to seek views directly about the issues the consultation document raises.</p> <p>At each site visited a folder containing the following was delivered and explained:</p> <ul style="list-style-type: none"> <li>• 1x consultation letter</li> <li>• 2x consultation document</li> <li>• 2x response form</li> <li>• 2x call for sites response form</li> <li>• 1x consultation leaflet</li> </ul> <p>Where residents were not present, the folder was delivered alongside a letter explaining the purpose of the visit and asking interested parties to contact the Planning Policy team to discuss the consultation.</p>	<p>Views given at those site visits were compiled by Officers and set out on response forms. They form part of the overall number of consultation responses and are available at the website:</p> <p><a href="http://www.bathnes.gov.uk/planningfortravellers">www.bathnes.gov.uk/planningfortravellers</a></p>
Face to face discussion at Council offices	<p>During a face to face discussion with a local Traveller copies of the main consultation document, response forms and leaflets were passed on. The member of the public was asked to spread the word of the consultation to anyone else that may be interested in making comments. (November 2011)</p>	

<p>Drop-in events</p>	<p>Events open to the public to discuss issues and proposed site selection methodology. Also used as awareness raising point of contact, to enable open discussion.</p> <p>Drop-in events held at:</p> <p><i>1 December 2011</i> Unit 9, The Centre, High Street, Keynsham</p> <p><i>6 December 2011</i> Midsomer Norton Library, High Street, Midsomer Norton</p> <p><del><i>8 December 2011 cancelled and held instead on 5 January 2012.</i></del> Green Park Station Foyer, Green Park Road, Bath</p> <p><i>Cancellation posters were erected at the venue on 8 December, and a notice was posted on the website. All those who contacted the Council about this event were informed of the new consultation arrangement.</i></p>	<p>Copies of the display material shown at these events are included at Appendix H.</p>
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## **4.0 Results of Stakeholder Consultation**

### **Drop-in Events**

- 4.1 As noted at 3.0, three drop-in events were held in Keynsham, Midsomer Norton and Bath. Each provided the opportunity for more in-depth discussion with officers and was scheduled so as not to conflict with the main holiday period in December. Attendance by the general public at the first two events was relatively small but was more successful at the third event in Bath at which a larger number of people viewed the display boards and discussed the consultation with officers and the Planning Aid volunteer also present on the day.
- 4.2 Comments and discussion at each of these events was largely positive, with the majority of respondents emphasising their support of the Council's work on the matter. Attendees at these events included Parish Councillors and members of the general public; a number of members of the local travelling community also self-identified. Those people who self-identified as Gypsies and Travellers were helpful in stating their needs and desires for site development. Those comments directly reflected the content of the evidence shown in the West of England GTAA (2007).
- 4.3 Comments were focused on the following points:
- Why the Council was progressing the document at this time;
  - The current numbers of Gypsies and Travellers in Bath and North East Somerset;
  - The history of travelling communities in Bath and North East Somerset, including the changing requirements of Travelling Showpeople;
  - The overarching requirements for pitch provision nationwide;
  - Methods of pitch provision and how these can vary according to the needs of the intended occupants;
  - The differences in permanent and transit pitch provision and the requirements for each;
  - The differing needs and desires for on-site development by each cultural group;
  - The site selection criteria and methodology;
  - The different forms of site ownership and rent arrangements.
- 4.4 At the event in Bath a small number of instances of racial prejudice occurred. On each occasion officers directed the members of the public to available information and indicated that racist representations would not be accepted by the Council.
- 4.5 Hard copies of the main consultation document and response forms were available free of charge for members of the public to take away from the drop-in events. As noted at section 3.0 all documents were also made available in libraries across the district and for download from the Council's website.

## Site Visits

- 4.6 Direct contact was made with several members of the local community at the visits made to each of the known Gypsy and Traveller sites across the district. At each of these visits the purpose of the consultation was explained and information on how to respond to the consultation or to contact relevant officers was given.

## Formal Comments Received

- 4.7 A total of 41 responses were received on behalf of 7 individuals, 24 parish and town councils (including the Valley Parishes Alliance, representing 6 B&NES parish councils) and 15 organisations, including adjoining local authorities. Of these, 9 formal comments were made by post and 30 were made by email over the 8 week period of public consultation. 4 of the responses were received late. A formal consultation response was also received from the B&NES Waste Services team.

- 4.8 The rest of this section briefly summarises the general responses to the specific consultation questions. Full responses are set out in Appendix I.

**Question 1:** *Should the evidence base be updated to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople in Bath and North East Somerset beyond 2016? If so, in what ways does it need updating?*

- 4.9 Responses to this question generally indicated the need to update the evidence base beyond the planned target figures to 2016. Responses in favour of updating the evidence base noted:

- that the evidence base may be updated, using the existing approach of projecting a growth figure of 3% forward;
- any projections should be refined as more up to date information becomes available and additional allocations made where the evidence indicates a shortfall in provision;
- the use of forward projections would reduce the potential for underdelivery of accommodation as against actual need;
- the Gypsy and Traveller Accommodation Assessment (GTAA) should be updated at 5 year intervals, and earlier if significant trends arise from the annual caravan count;
- the timeline for the Site Allocations DPD should match that of the B&NES Core Strategy, to 2026;
- emerging national policy indicates the need for a five year housing land supply which the DPD does not currently provide for.

- 4.10 Just 2 respondents indicated that no update of the evidence base was required, stating that the existing projection to 2016 was advanced enough to accommodate existing need and that the process should not be delayed further. A further respondent noted that numbers of Travellers tends to rise with increasing financial difficulties, and that it is difficult for those families living on the road to park legally.

- 4.11 The Council will carefully consider the need to update the evidence base to ensure the DPD is robust. Currently projections have been calculated from 2011 evidence of need to 2016, resulting in need for 22 permanent and 20 transit pitches and 1 plot for Travelling Showpeople.
- 4.12 If the annual household growth rate of 3% used in the GTAA were applied to the existing target pitch provision there would be a need for an additional 4 permanent pitches over the 5 years following 2016 to 2021. This would bring the total permanent pitch provision in Bath and North East Somerset to 26 pitches over the period 2011-2021.
- 4.13 Any additional need arising after the provision of sites to meet the current need would have to be met either through a review of the DPD or through ad hoc planning applications, which would be determined against adopted planning policy.

**Question 2:** *Is the proposed additional indicator sufficient to assess the effectiveness of the DPD in meeting its objective of reducing the number of unauthorised sites across Bath and North East Somerset?*

- 4.14 Of the 13 responses to this question, just 2 respondents indicated that it was insufficient. The remainder were positive, either simply stating that it was sufficient, or recommended additional details. Those details include:
- relating the net pitch provision to the wider target for pitch provision in B&NES and the remaining shortfall;
  - similarly, the numbers of evictions in the District to indicate remaining levels of unmet need;
  - monitoring the location and date on which unauthorised sites were established.
- 4.15 One respondent stated that insufficient permanent sites have been proposed by the DPD. A further respondent noted that communication between B&NES Council and the travelling communities needs to be maintained to facilitate understanding and ease of movement.
- 4.16 The use of the proposed indicator is supported by respondents to the public consultation, but may benefit from the addition of detail referencing the original / reviewed targets for pitch provision.

**Question 3:** *Are there any further monitoring indicators that may be suitable for inclusion in the DPD?*

- 4.17 A number of additional indicators were put forward by respondents to this question:
- explicit reference to pitch requirements and the numbers of (a) permanent, (b) transit, (c) Travelling Showpeople yards and (d) total pitch provision;
  - the number of Travelling Showpeople plots.
- 4.18 A number of respondents put forward recommendations for indicators that are not suitable for inclusion within the Site Allocations DPD as they do not relate to matters within the remit of the document or are not planning matters.

- 4.19 The number of Travelling Showpeople plots should be included as an additional indicator. As with question 2, measuring the pitch provision against the target figures set in the Draft Core Strategy would be beneficial.

**Question 4:** *Should the preferred approach be to allocate sufficient land to allow groups to live separately from each other?*

- 4.20 Two respondents simply stated 'no' to this question whilst another respondent stated that smaller sites were preferred to larger sites. The remaining 9 respondents indicated that the preferred approach should be to enable the provision of sites for groups to live separately of one another.

- 4.21 Public support for this, the evidence base contained in the GTAA and government guidance indicates that provision of 'large' sites or a single site to meet the total level of accommodation need would be inappropriate. The preferred approach, as supported by the public consultation, will be to allocate sufficient land to allow groups to live separately from each other.

**Question 5:** *Should sites make allowance for future family growth to prevent overcrowding?*

- 4.22 Three of the 12 respondents stated no to this question, with just 1 respondent providing a reason (clear definition of family groups). The remainder supported making allowance for future family growth on sites, indicating that this would avoid future overcrowding. Other responses included the recommendation that:

- any allowance should be limited to a maximum of 5 additional pitches;
- site sizes should be proportionate to the specific requirements of individuals or families;
- any allowance for expansion should be limited to 'close' family only.

- 4.23 One response also noted that allowance for future family growth would be difficult to balance with finding sites for land.

- 4.24 The consultation responses are in accordance with Government guidance. The preferred approach will be to make allowance wherever possible for future family growth on-site to prevent future overcrowding. Wherever this provision is made, this would have to be strictly controlled by condition or site management.

**Question 6:** *What form of tenure do you consider would best suit the needs of the Gypsy and Traveller community in Bath and North East Somerset? Please give reasons.*

- 4.25 Results to this question were mixed, with specific recognition from several respondents that all three forms of tenure set out in the consultation document would meet different needs in the District. This was noted as being of importance in matching the financial circumstances of proposed site occupants.

- 4.26 Responses from the Parish Councils and individuals together broadly indicated a preference for publicly owned sites leased or rented either by Bath

and North East Somerset Council or by a Registered Provider. Comments accompanying this preference include:

- rental gives the community and the authority more flexibility of tenure and management;
- publicly owned and managed sites would help manage individual site pitch and resident numbers, and commercial activity could be monitored;
- publicly owned sites would emphasise the Council's ongoing responsibility as well as generate revenue.

4.27 One respondent noted that privately owned sites would provide self-motivation for effective site management. A further response indicated the importance of communication with the local travelling community to ascertain local needs and preferences.

4.28 The Council will carefully consider the support for public site provision and management when consulting on individual sites. Public support for Council or Registered Provider managed sites will be balanced against the needs and desires of the local travelling communities.

**Question 7:** *In order to cater for a range of needs, do you consider a rural exception site policy is required?*

4.29 Four responses to this question supported the use of a rural exception site policy where this was deemed necessary and supported delivery of sites to meet local need. Six respondents indicated that they do not support the use of such a policy, with additional comments noting:

- the use of a rural exception site policy may cause resentment and conflict;
- the Council should establish that there is a shortage of affordable land prior to putting a rural exception site policy in place;
- concern as to how rural exception sites may be managed.

4.30 The provision of sites under a rural exception site policy will be carefully considered when consulting on individual sites. The need for the use of such a policy will be balanced against the needs of the local travelling communities and land availability.

**Question 8:** *Do you agree that mixed residential and business uses should only be permitted where appropriate to the location and where the safety and amenity of residents and neighbours will not be compromised?*

4.31 Ten of the thirteen responses to this question supported the provision of mixed residential and business uses on sites in appropriate locations. One respondent noted that mixed use sites should only be permitted on brownfield land and not in the Green Belt, whilst two others noted that the form of on-site business activities should be controlled by appropriate planning conditions. Another respondent highlighted the importance of child safety on sites with mixed-uses.

4.32 One of the respondents stating a preference against any form of business activity on sites noted that this objection would be particularly strong on any sites allocated within the setting of the Bath World Heritage Site.



- 4.33 Public support for the provision of mixed residential and business uses will be taken into account when consulting on individual sites. This will be carefully considered against site suitability and the need for such mixed use sites.

**Question 9:** *Are there any additional criteria that should be considered in selecting the best locations for Gypsy, Traveller and Travelling Showpeople?*

- 4.34 In noting the criteria set out within the consultation document, two additional criteria were recommended:

- a general presumption against development in the World Heritage Site;
- sites should not be located within 1.5km of a conservation area.

- 4.35 One respondent raised concerns with the existing criteria, indicating that previously developed land can provide valuable habitats to wildlife which should be considered when assessing potential sites.

- 4.36 A further respondent also noted that local public consultation should be a criteria. This is not considered appropriate for inclusion as the matrix assesses the planning merits of individual sites. Public consultation will be conducted as an important part of the development of the Site Allocations DPD.

- 4.37 As a result of consultation responses specific criteria relating to the impact on the World Heritage Site and conservation areas have been introduced to the scoring matrix. The impact on each designation will be carefully considered in site selection.

**Question 10:** *Does the proposed site selection methodology and the range of factors to be considered provide a reasonable and robust means of assessing potential site suitability?*

- 4.38 Nine respondents supported the methodology and criteria as being a reasonable and robust means of assessing site suitability. However, a number of criticisms of the site selection methodology and criteria were raised by this question. These included:

- sites covered by national or local wildlife designations should not be considered for development;
- criteria relating to distances from services and facilities are too tightly drawn and will exclude potential sites;
- scores can potentially remove the impact of other scores, so there should be additional weighting;
- potential for conflict with other uses by encouraging development on previously developed land;
- impact on the setting of heritage assets has not been included.

- 4.39 As the site selection methodology received broad public support it is considered appropriate to use this to conduct the first stage site assessment. It is considered to be robust in the context of Circulars 01/2006 and 04/2007 relating to the development of Gypsy, Traveller and Travelling Showpeople sites.

4.40 The use of the scoring system does not preclude individual sites being brought forward as preferred options, but is a useful way of interpreting criteria relating to site sustainability and suitability for development. The impact on heritage assets will be considered as part of individual site assessments. Detailed comments on the content of the scoring matrix will be considered below.

**Question 11:** *Are there any other criteria that should be considered in site assessment?*

4.41 Three additional criteria were recommended by respondents to this question:

- proximity to a secondary school via a safe walking route;
- impact on the setting of the Bath World Heritage Site;
- impact on AONB and Conservation Areas.

4.42 Taking account of priority habitats and species, as recommended by one respondent, is already included within the site selection criteria.

4.43 Further recommendations that are not matters for inclusion within the site selection scoring matrix include:

- taking account of the capacity of local services and facilities;
- the ability to impose appropriate planning conditions on business use on mixed-use sites;
- the number of unauthorised encampments;
- locating sites within urban areas to assist social cohesion, particularly for school-age children.

4.44 These matters are either considered elsewhere within the Site Allocations DPD or are matters that are dealt with by the development management process.

4.45 Impact on the World Heritage Site and conservation areas will be incorporated into the detailed site assessment. The proximity to a primary school is considered sufficient at present to assess site suitability but reference to secondary schools will be included where this is considered appropriate.

**Question 12:** *Are the scores and weighting set out in the scoring matrix appropriate? Should any of the criteria be scored differently?*

4.46 The scoring system is intended as a comparative system by which to determine how well sites perform against a number of criteria. The end score is not determinative as to whether sites will be the preferred options for allocation, as a second stage of assessment will be undertaken. This second stage of analysis will include subjecting individual sites to Habitats Regulation Assessment. A number of respondents to this question do not take the full implications of this into account.

4.47 The responses to this question include:

- the importance of wildlife could be hidden by the impact of other scores;
  - weighting should take account of the Bath World Heritage Site;
  - weighting for Green Belt is excessive compared to other criteria;
  - weighting for Green Belt is not high enough compared to other criteria;
  - weighting for Green Belt should be Yes -20 and No 0;
  - weighting for Green Belt should be Yes -10 and No +10 (two respondents);
  - score of 0 for sites within the Green Belt indicates a neutral impact which is considered erroneous;
  - scoring should explicitly state that the criteria on landscape designations include AONB, SSSI, SNCI and Regionally Important Geological Sites;
  - weightings for impact on the Green Belt and AONB should be increased;
  - allocation of brownfield sites may prejudice development of sites for alternative uses;
  - weighting for brownfield sites is not high enough;
  - scoring should take account of Conservation Areas and that should be Yes -10 and No 0;
  - criterion relating to hazardous places should include wind turbine sites and scoring for this should be Yes -10 and No 0;
  - the scoring for access to a public highway should be Yes +5 and No -10;
  - the scoring for on-site parking and turning should be Yes +5 and No -10;
  - the weighting for on-site parking and turning and ability of road network to accommodate additional traffic should be greater;
  - the scoring for noise issues should be Yes -10 and No 0;
  - scoring for access to services and facilities should be more flexible;
  - access to employment opportunities should be included.
- 4.48 One response relating to flood risk was discussed with the respondent who indicated that those comments are no longer relevant.
- 4.49 Support for the proposed site selection methodology and scoring matrix has already been expressed in response to questions 10 and 11. The scoring system attempts both to score different criteria proportionally, and also for individual criteria scores to be proportionate to one another.
- 4.50 The Green Belt scores of Yes 0 and No +10 attempt to take account of the large proportion of land within Bath and North East Somerset that is covered by Green Belt, acknowledging that it is both unlikely and difficult to bring forward sites outside the Green Belt. Thus, the score for sites outside the Green Belt is positively weighted to reflect this difficulty. The No score is not intended to imply neutral impact, but to compare sites scoring positively on the Yes score against those less well performing within the Green Belt.
- 4.51 The weightings applied to the criteria attempt to convey their relative importance, as informed by government guidance, and are not the sole determinant in preferred site selection. No changes to the weightings

attributed to the various criteria are being altered, as more detailed assessment of individual sites will be conducted after the application of the scoring matrix.

**Question 13:** *Are there any other issues that the Council should take into account when preparing this DPD?*

4.52 This question sought information on any outstanding issues not already considered by the Site Allocations DPD. The wide-ranging responses to this question included:

- consideration of wildlife issues is not clear and inconsistent with the B&NES Core Strategy;
- consideration should be made of the need to allocate land for boat dwellers' moorings;
- the need for the DPD to consider space requirements for the keeping of horses;
- monitoring site usage, including overcrowding and commercial use (as dealt with by questions 1 and 2);
- indicating the location of unauthorised Gypsy and Traveller sites in B&NES;
- individual site deliverability;
- the need to include the local travelling communities in decision-making;
- the need to consider supporting children and families in entering education and social cohesion.

4.53 One response asked for reference to be made to commercial charges on mixed-use sites. This is not a planning policy matter; such issues are dealt with separately by a licensing system.

4.54 Another respondent suggested that the DPD had failed to take account of the potential for site allocation on land being vacated by the Ministry of Defence in the District.

4.55 A number of respondents recommended that authorised sites be assessed periodically with reference to antisocial behaviour and criminal activity. Those matters are outside the planning policy system.

4.56 The consideration of wildlife and landscape designations will be clarified and detailed in individual site assessments and be widely consulted on as part of the next DPD stage Options consultation.

4.57 Consideration of boat dwellers' moorings is not the subject of the Site Allocations DPD. An assessment of boat dwellers' needs is currently being considered by the Council and further information on this will be made publicly available as soon as practicable.

4.58 The need to accommodate horses on sites is a matter for individual site consideration, and will be considered as part of the wider assessment of preferred sites at the Options consultation.

- 4.59 Site occupancy and on-site activity is a matter for monitoring by the planning enforcement and housing teams and as such is not considered by the DPD.
- 4.60 It is not helpful to identify the location of existing known unauthorised encampments or developments for the purposes of the DPD.
- 4.61 Site deliverability will be analysed as part of the detailed site assessment of individual sites.
- 4.62 Consultation on the DPD will be conducted in line with the Local Development Scheme and will specifically seek to include and engage with members of the travelling communities as a priority.

**Question 14:** *Do you have any other general comments on the Issues and Options Report? Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.*

- 4.63 The 30 responses to this question were wide-ranging. Responses included:
- sites should be self-sufficient in terms of facilities and financial upkeep;
  - the Council should appoint a person to manage authorised sites;
  - specific consideration should be made of the setting of the Bath World Heritage Site in assessing sites;
  - concern that allocation of sites on land that may otherwise be used for the development of railways or railway stations would preclude such development;
  - reference to a recent Secretary of State appeal decision regarding a Gypsy site in Hertfordshire;
  - support for the approach to a site selection methodology consultation to be followed by a preferred site options consultation;
  - support for the site selection criteria as derived from the B&NES Draft Core Strategy and Local Plan;
  - concern that the Site Allocations DPD makes no provision for boat dwellers;
  - specific recognition of AONB and the protection of land covered by this designation;
  - enforcement action against unauthorised sites in B&NES once authorised sites are provided;
  - indication that length of site occupancy should be limited;
  - need to take account of household waste collection and storage;
  - noting the importance of public consultation on this document.
- 4.64 One respondent also put forward comments relating to the B&NES Draft Core Strategy. It is not possible for amendments to policy set out within that document to be made through the Site Allocations DPD.

- 4.65 It was indicated that Table 3.2 contains an incorrect notation referring to the requirement for Travelling Showpeople plots for Bristol; this figure should read 8 and not 11, as stated. Further reference to these figures will be corrected.
- 4.66 A request that criminal activity and the impact on highways be monitored was raised in responses to this question. Whilst the impact of development on highways will make up part of the assessment of sites for allocation, criminal activity is not assessed by the DPD. The aim to reduce crime and fear of crime is assessed on an ongoing basis throughout the production of the DPD in the Sustainability Appraisal.
- 4.67 A number of responses stated general support of the aims of the Council and the Site Allocations DPD in working towards provision of 22 permanent and 20 transit sites for the travelling communities in Bath and North East Somerset.

***Question 15:*** *Do you know of any land in the District that, based on the criteria set out above, may be suitable, available and deliverable to provide Gypsy and Traveller pitches or a Travelling Showpeople yard? If so, please complete the accompanying form as fully as possible.*

- 4.68 The final question in the Issues and Options consultation paper requested feedback on land with potential for allocation within the Site Allocations DPD. One respondent noted that outreach work should be undertaken with the local travelling communities, including those in neighbouring authorities.
- 4.69 The remainder of responses to this question indicated the lack of land in those respondents' areas suitable for development as a Gypsy or Traveller pitch, or a Travelling Showpeople yard.

## **5.0 Conclusions**

- 5.1 The consultation for the Site Allocations DPD Issues and Options document took place over an 8 week period and included three public drop-in events and news coverage.
- 5.2 While the level of response to the consultation was limited, the content of those responses was wide-ranging, with comments from parish councils, individuals, interest groups and an adjoining local authority. Whilst just 1 formal written response was received from individuals self-identifying as being from the travelling communities, officers were able to discuss the consultation with those on existing unauthorised sites through site visits and at the formal drop-in sessions. Those discussions were useful in building contacts and in
- 5.3 Two responses to the Call for Sites were also sent from those self-identifying as from the travelling communities. A further general consultation response was received by a person self-identifying as a boat dweller.
- 5.4 General feedback indicates broad support for the DPD, with a large number of respondents supporting the allocation of land for the provision of accommodation for Gypsies, Travellers and Travelling Showpeople. Any negative comments were focused on specific aspects of that provision and concern as to where sites will be provided.
- 5.5 The Council is satisfied that the consultations undertaken on the Issues and Options for the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD, referred to in this Consultation Statement, comply with the requirements pursuant to Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.