

Respondent: 263 / 3 Name: Ms Gillian Sanders Organisation: Wessex Water

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Bristol Water for water supply.

Subject to application there is a public foul sewer available for connection in the vicinity of the site

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 266 / 1 Name: Mr Brian Cassidy Organisation: The Bath Society

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1. As a resident of Radstock I welcome the news that Gypsies and Travellers may officially become a part of our community because their cultures and traditions will add variety and richness.
2. I support the council's moves to identify sites but ask them to choose ones which give due value to Gypsy and Traveller Communities and their entitlements and needs.
3. I am opposed to the site in Bath Old Road since I believe it sends out negative messages about these groups - that they deserve nothing better than a disused, asbestos ridden building with little space. In addition, manoeuvring in and out of that site is going to be difficult for whoever eventually lives there, given the amount of congestion caused by parked cars and rat runs in the rush hour.
4. I would prefer to see Gypsies and Travellers offered more spacious sites such as Upper Whitelands where the bases of previous prefabs are a blot on the countryside, or on land close to the edge of Tynning. In any event, any site chosen must be near schools and health facilities and I have no particular brief for these two but cite them as examples which might work and which I know because they are very close to where I live.
5. The Church of England is a very considerable landowner in the area and has shown itself to have a sense of social responsibility. It should be approached to see if they can make some land available.
6. I do not adhere to the view that Gypsies and Travellers inevitably leave rubbish or behave in anti-social ways any more or less than any other groups in the community. Appropriate measures must be taken to ensure that they benefit from all usual council services. Of course, Gypsies and Travellers may, for example, leave rubbish from time to time, but so do lots of other members of the community - as a regular walker in the area, I often see signs of rubbish dumping and fly tipping and am in no doubt that this cannot be laid at the feet of one particular section of the community.
7. I believe that B&NES could have been more supportive of Gypsy and Traveller culture so that other groups in the community would have a more positive image of them. Why not ensure that these groups are asked to contribute to arts and cultural events as a matter of routine?
8. The proposed site in Radstock was poorly thought out and inevitably led to a sense of confrontation developing.

9. Gypsies and Travellers have long been subject to racism and it is a legal imperative that the Council takes action against this whenever it appears.

Respondent: 279 / 2 Name: Mr Rohan Torkildsen Organisation: English Heritage

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Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We hope the following comments will help shape a plan which provides a more robust case for appropriate sites in accordance with the National Planning Policy Framework (NPPF).

At present English Heritage is concerned by the assessment process employed to determine site suitability. The approach fails to apply an even handed consideration of the key planning issues particularly the affect of proposed site allocations on the historic environment.

The Plan fails to demonstrate that evidence about the historic environment has been used to assess the significance of all heritage assets affected and how they contribute to the local area.

Site assessments process

An initial sift of 23 sites discarded certain options that were contrary to "national planning policy" including sites located within an Area of Outstanding Natural Beauty (AONB).

"Those sites identified as being within and thus impacting adversely on the national landscape designation, the Cotswolds Area of Outstanding Natural Beauty were rejected"

There is no reason or explanation why sites in the AONB were rejected as a matter of course whilst those in the Green Belt, World Heritage Site (WHS) or adversely affecting a designated heritage asset were not.

You have allowed the consideration of sites in the Green Belt due to 'exceptional circumstances' but have not considered sites in the AONB for the same reason.

I refer to Policy E pg 5, National Policy for Traveller Sites March 2012. "Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

There is no justification for the AONB being given greater weight in the plan making process than Greenbelt, the World Heritage Site, Conservation Areas or indeed in the curtilage of a Grade II listed Building. You should note that Paragraph 14 of the NPPF attaches the same weight to designated heritage assets as Green Belt and AONB.

As such if you choose to reject sites in the AONB as a matter of course you should also reject sites within the WHS, Conservation Areas or within the grounds of a listed building. We are not suggesting you do this as a matter of course but we are anxious to ensure a thorough consideration of the historic environment and all heritage assets, as defined in the NPPF, is undertaken and that greater weight is not applied as a matter of principle to the AONB or that those sites within the AONB are omitted for that reason.

A 2 stage sift process was used to exclude certain sites. The scoring matrix was used to assess the relative sustainability of

each site based on whether they were in the Green Belt, landscape, wildlife designation, flood risk or land contamination. This fails to give an appropriate weight to the consideration of heritage assets. You should note that heritage conservation is at the heart of the definition of sustainable development in the NPPF. Inadequate weight has been applied to heritage conservation in the assessment process.

Likewise the assessment process appears to have given greater weight to matters such as noise and overlooking.

Page 14 of the Site Assessment Report refers to the emerging Core Strategy Policy CP11 and the need to ensure sites should have no adverse impact on nationally recognised designations (criteria g) and do not harm the character and appearance of the surroundings (criteria d).

For a variety of reasons various sites have been rejected. But none appear to have been abandoned due to the adverse impact on heritage assets e.g. school building, Radstock; Ellsbridge House, Keynsham.

Unequal weight appears to have been applied to various relevant significant criteria without proper regard to the strategic NPPF principles for the conservation of heritage assets.

The Site Scoring Matrix at Appendix B of the Assessment Report makes no reference to the impact on heritage assets other than the World Heritage Site or Conservation Areas. There is no consideration, for example of the impact on listed buildings such as Ellsbridge House, Keynsham.

Unless there is clear evidence to demonstrate otherwise your site search sift should clearly have resulted in the omission of the Ellsbridge House as development in the curtilage of a listed building would presumably harm its historic significance and would therefore be contrary to NPPF and emerging Core Strategy policy?

I refer to Appendix E of the Site assessment report

"Development at this location would likely not assist the promotion of peaceful and integrated co-existence between the site and the locality due to the level of visual exposure".

Has this same assessment been undertaken for all other sites?

Radstock Primary School (GT.4)

The assessment fails to apply NPPF policy for the Historic Environment or local planning policy and guidance in the consideration of this site for development. It therefore fails to give an accurate indication of the sites suitability. The report fails to assess the significance of the building to be demolished as a heritage asset in a conservation area. It also fails to set out an understanding of the sites contribution to the character and appearance of the conservation area or how any development in its place would preserve and enhance the character and appearance of it.

Specific preferred options.

Without prejudice to the above I have the following specific comments on the preferred options.

Planning across boundaries

If BANES Council are struggling to find suitable sites might there be alternative opportunities in adjoining local authority areas? Local planning authorities are required to work collaboratively with other bodies to ensure that strategic priorities such as adequate provision for Gypsies, Travellers and Showpeople across local boundaries are properly co-ordinated and clearly reflected in local plans

Conclusion

We strongly recommend a more consistent and objective process of evaluation to ensure this Plan accords with the NPPF and its principles for sustainable development in relation to protecting and enhancing the historic environment, and national policy for the provision of suitable traveller sites.

As it stands the Plan fails to demonstrate that adequate evidence and subsequent informed assessment has been

undertaken contrary to the NPPF. As such English Heritage considers the plan is unsound.

Respondent: 296 / 3 Name: Ms Gill Stirling Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I am writing regarding the preferred sites for travellers and showmen. I can only comment on your list although I believe some of these were not even thought suitable by your own consultants. It seems to me that both the travellers and local residents should be considered when making a decision. I do not live near any sites and believe that those who do should have the greater influence.

GT4: Former Radstock Infant School canteen,

This site would appear to be totally unsuitable for both travellers, who have chosen a life style of freedom and open spaces, and also for those living close by. Trying to mix entirely different lifestyles in close proximity leads to unhappiness on both sides.

Respondent: 821 / 1 Name: Mrs Deborah Porter Organisation: Cam Valley Wildlife Group

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

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1.0 Supply of pitches in the short, medium and long term

1.1 A very small number of pitches are to be delivered when compared with the overall housing figures for B&NES. Given this small number of pitches, and the pressing need for official sites in B&NES, I consider that it is important that considerations that would normally be taken into account at planning permission stage are considered when allocating. Not to do so risks elimination of sites at the planning application stage or elimination/delay through legal challenge by residents. Either could result in failure to deliver sufficient sites to meet the need or failure to maintain an identified 5-year supply or developable sites for the 10 year or 11-15 year periods. Any impact on the application of the Duty to Cooperate with neighbouring authorities also needs to be considered.

2.0 Criteria for consideration of sites

2.1 Government policy is that Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. There is a real need for provision of a sufficiently high number of good pitches, not only to give travelling communities somewhere to live temporarily, or permanently for a period of their lives, but also to prevent unauthorised pitches springing up all over the place.

2.2 It is my view that B&NES must look into the viability of the sites in much more detail now if delivery is not to be put at risk. My view is that it would be useful for B&NES to consider prospective sites at this stage in the light of considerations below (1.4 - 1.6) and also using the criteria they would use in considering planning applications, but in accordance with the most recent Government policy and guidance and in a way that does not conflict with B&NES emerging policy. The small number of sites involved should not produce too onerous a task, I would have thought.

2.3 Access to appropriate jobs is vital (Communities and Local Government document, Planning for Traveller Sites, para 2.4); this is especially important in the context of the high illiteracy rate within the travelling community and for families who have ceased to travel in connection with providing for their children's needs, including continuity of schooling and good educational achievement. These are known reasons why travelling people cease to travel for a period of their lives and travellers are no different from other people in their desire to provide for themselves and their families through income from jobs. The high illiteracy rate, however, makes it more difficult on average to secure a permanent job and so good access to appropriate jobs should be a primary consideration in site evaluation in my view. The existing jobs to dwellings ratio, out commuting rates, the job profile of the area and surrounding area, access to seasonal jobs, and any impact of forthcoming strategies should be considered.

2.4 Chronic or long-term health problems are high in travelling communities. Looking after elderly people and people with illnesses and disabilities is another known common reason for temporary or permanent cessation of travelling. A significantly higher proportion of travellers seeking a permanent pitch will have health problems than is the case for the general population and people with these problems may well not be able to travel or drive. It is important that good access to health care is ensured for travellers on permanent pitches as a priority when evaluating sites.

2.5 Government publications (e.g. Communities and Local Government document, Planning for Traveller Sites, para 2.15) and training documents sent to councillors (e.g. Gypsies and Travellers, published by Friends Families and Travellers) stress the need to address the particular problems of the travelling community in order to address inequalities and promote equality of opportunity, which is relevant to the Equality Act 2010. I cannot see how this will be achieved unless the matters in 1.4 and 1.5, above, are considered during site selection.

2.6 Wood burning stoves can be linked to/part of the cultural identity of travelling people; outdoor fires and 'wooding' (collecting wood for fires) are particularly strongly associated with New Travellers (originally a lifestyle choice in the 1960s, but now an established way of life). Although nationally the majority of travellers are Gypsies and Irish Travellers, this is not the case in B&NES, where New Travellers make up the bulk of travelling people. Whilst travellers travelling through the landscape taking some wood as they come and go may not have a significant impact on any one area, a permanent site or a transit site does have a significant impact. Invertebrate species that live on dead wood and the health of woodland or partial woodland SNCIs (including through the role of fungi in the woodland ecosystem) is an element that may be overlooked when considering location of sites. Travellers may lack the means, or the will (for cultural reasons), to purchase farmed wood, which is expensive. There is a real risk that locating travellers sites, even small sites, in B&NES close to woodland SNCIs, especially where a significant deciduous element is present, will risk their quality, risk important species, and act against B&NES objectives and policies regarding protection and enhancement of the natural environment and biodiversity.

3.0 Proposed site, Former Canteen, Radstock Infants School, 0.05 hectares (= 500 sq m) - 2 permanent pitches identified

3.1 The larger school site has been the subject of several applications for development. There is a recognised (by B&NES Highways Dept.) existing traffic management/speed issue on Bath Old Road (south of its junction with Woodborough Road) and the Highways Officer at the application for housing development on the whole school site (11x 4-bed & 3x 3-bed dwellings) said that even a marginal increase in movements could exacerbate this issue, and that contributions from the development towards remedial works was appropriate. There were considerable other problems connected with housing development, including overlooking, the proximity of a tree with a TPO, shading from adjacent property, and impact on the conservation area from parking and design. A lower than normal housing density would be required to overcome these problems, it was stated. The use of natural stone was recommended. It was noted that there is a deficit of formal green space in the Radstock area. Overlooking of any traveller pitches could become an issue if the adjacent former school site is subsequently considered for housing development.

3.2 Conservation area and access considerations in Bath Old Road should be considered, which may rule out access by the size of vehicles that would be moved into and out of the site, given the requirements for pitches to accommodate caravans/trailers; it may require a higher white lias frontage or additional planting to screen from view any structures not in keeping with the historic grain, but this would be difficult to achieve in practice because of the narrowness of the site and the width of access needed to accommodate caravans and trailers. The impact on the grain and Conservation Area acted against development when the 14-house development was refused permission. It is important that this is addressed, to avoid prospective developers being able to argue for developments that do not respect the historic grain in the future due to the presence of a development that already does not do this.

3.3 There is some concern from local residents that use of the site for two pitches may result in illegal occupation of the adjacent former school site. Can B&NES ensure that illegal occupation of the adjacent site would be prevented?

3.4 The pitch size dictates use as either two small permanent pitches or one family pitch, yet capacity for two is specified on the assessment, which suggests that two single pitches are proposed rather than one family plot. For an allocation of two single pitches rather than one family pitch, the contribution to the scoring from proximity to schools is likely not to apply and so should be discounted if two pitches is the official capacity for this site. The 500 square metres per pitch figure for permanent pitches includes all considerations, including play space, for mixed tenure . 200 sq m is the recommended size for a small pitch and 500 sq m for family pitch.

3.5 I am informed by Cllr Jackson that a survey of traveller families conducted by travellers in 2006-7 revealed a significant demand for a family plot. This suggests that there is some evidence of demand for the use of the plot as a single permanent family pitch, but locating one travelling family in the whole of Radstock may subject that family to some degree of cultural isolation. The desirability of this should be investigated through talking to travellers and travellers' representatives. Also, the likelihood that travellers on two single plots might feel the effects of cultural isolation (Planning for Traveller Sites, para 2.4) more acutely should be investigated before considering this site suitable for pitch allocation. This should be investigated through talking to travellers and travellers' representatives. It is not clear that there is evidence for traveller demand for paired single pitches.

3.6 I have argued for the particular importance of considering access to appropriate jobs in paragraphs 2.3 and 2.5 and good access to health care in paragraphs 2.4 and 2.5. There is a poor jobs to dwellings ratio in Radstock and I understand that health provision for the area in which it is proposed to place the permanent pitch/pitches is not good, or even poor. Government figures show that there is a significantly higher incidence of long term and chronic illnesses in the traveller population. Given the nature of the most common reasons for travellers wishing to settle, it follows that there will be a higher incidence still in travellers moving onto permanent pitches, such as the two proposed for the canteen site. Therefore, the matter of access to health care needs to be carefully considered.

Respondent: 1327 / 1 Name: Dr Eleanor Jackson Organisation: Meadow View Residents Association

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes. The Radstock site is wholly inappropriate for a number of reasons:
 The site is within the designated Radstock Conservation Area.
 The site has major constraints with regards parking, access and highway visibility.
 The site would have a negative impact on the residential amenity of local residents.
 Alternative uses of the site including affordable housing and the potential for an overall sustainable development with the adjacent Infant School site have not been explored or taken into consideration.
 The process undertaken in terms of site selection is seriously flawed. Whilst the site may be available for development, it is certainly not suitable for the proposed use, nor do we believe it has been satisfactorily demonstrated by the BANES that it is an achievable site to meet the proposed end use. We provide evidence for this in the remainder of this consultation response, referring where appropriate to adopted and emerging policies.
 In providing our response we have taken account the Development Plan Documents (DPD) as well as the following

documents: NPPF (2012) Planning for Traveller Sites (2012) Designing Gypsy and Traveller Sites (2008) B&NES Local Plan (2007) B&NES Draft Core Strategy

B&NES Gypsy and Traveller Sites – Outline Landscape Assessment – March 2012 Rev. B

West of England Gypsy and Traveller Accommodation Assessment – GTAA (2007)

B&NES Gypsy & Traveller Site Selection Exercise (2012)

B&NES Strategic Land Availability Assessment (SHLAA) – Report of Findings (2011)

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The opportunities identified for this site could be applied in ANY urban location i.e.: access to healthcare, education, shops and buses. If this assessment alone or by significant weight is used as the criteria for site selection then The Royal Crescent in Bath also scores very highly!

The constraints that B&NES have identified for this site far outweigh opportunities. It is very doubtful if the site would actually be granted planning permission, particularly having regard to adopted policies in the BANES Local Plan, National Guidance and Policy CP11 in the emerging Core Strategy.

It is considered unlikely that B&NES could successfully defend a legal challenge on either the process of site selection or the selection of this site.

It is considered unlikely that the selection of this site would pass examination by the Secretary of State if put forward to formal allocation.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. The site is unsuitable, not sustainable and would be very unlikely to receive planning permission. The use of the site as proposed would not be deliverable as it would not be possible to provide financial viability when seeking to overcome the constraints of access, highway visibility, parking and loss of public amenity. It is not possible to develop a Gypsy and Traveller site on this particular site whilst fulfilling the requirements of preserving and enhancing the character and appearance of the Conservation Area.

The sites at Lower Bristol Road, Twerton and Newbridge would both appear to be suitable and could be taken forward to formal allocation. In the case of the former it should follow formal consultation on removal from Greenbelt rather than be on the basis of 'very special circumstances' which would not be supported by evidence or the process undertaken.

It is understood that other sites may have also been identified and could help meet the potential pitch provision; however, we have some doubts as to the needs assessment in the West of England GTAA 2007 are either sufficiently current or robust enough to meet the criteria set out in the NPPF.

It is not entirely clear whether the pitch provision actually addresses the issues of the demographic identified in the GTAA as residing in the B&NES district.

Due to this, we are not entirely clear that the figures for pitch provision are correct. Perhaps none of the sites should be taken forward to formal allocation until a new 'needs assessment' update has taken place in conjunction with neighbouring authorities?

We have some concerns as to the extent of consultation with both the settled and Traveller communities, noting that the recent National guidance specifically refers to a need for early and effective community engagement. As an example, no assessment has been undertaken of Boat Travellers who live on the Kennet & Avon and could also be seen to have a housing need. Perhaps this group could be allocated berths within a marina therefore giving them access to healthcare, education and a safe and secure place to live?

Do you have any other general comments on the Preferred Options paper?

The Bath Old Road exists as part of the wider Radstock Conservation Area which was designated in 1999.

The School site itself has been disused since 2005 and the buildings left derelict by B&NES.

It is acknowledged that the current buildings on the site, constructed sometime around the Second World War, have little architectural significance; however, it is widely felt that the development of a traveller site in this location would not be either sympathetic or enhance this important historical streetscape.

Why is Radstock so important?

The discovery of coal in 1763 led to the development of Radstock as the centre of coal mining activity in north Somerset until the 1950's. [2.3.2] (Conservation Area Assessment for Radstock)

The terraces of homes erected by the colliery owners to house miners and their families are exceptional in terms of design

and their historical and architectural significance. Although 'none of the terraces are listed, their contribution to the town is unparalleled in their exceptional quality and character. They are not typical of the cramped industrial town, but built on the edge of established agricultural settlements, each with their own privies and extensive allotment gardens.' [3.3.1] (Conservation Area Assessment for Radstock)

Indeed, the Conservation Area Assessment carried out by B&NES Council in March 1999 recognises this importance and states:

'Radstock is one of the best preserved coal mining towns in England and unlike its midland and northern counterparts it still retains many important colliery features. It is a rare example of an early industrial landscape where small-scale mining existed in a rural community and has left an important local legacy.' [3.1.1] (Conservation Area Assessment for Radstock)

However, the Conservation Area Designation didn't just assess the town centre but also recognises the historic significance of those terraced miners homes and states,

'The boundary includes these unlisted terraces and others on each side of Bath Old Road with their associated gardens, all of which are fundamental to the mining legacy of the Somerset Coalfield.' [4.6.2] (Conservation Area Assessment for Radstock)

Bath Old Road is specifically mentioned in the Conservation Area Designation 1999.

What does Conservation Area Designation mean for Bath Old Road, Radstock?

The primary legislation in place to preserve and enhance the historic environment is the Planning (Listed Buildings and Conservation Areas) Act 1990. Under section 69 of the Act, a duty is imposed on local planning authorities to designate as conservation areas any 'areas of special architectural or historic interest, 'the character or appearance of which it is desirable to preserve or enhance'. [1.1.2] (Conservation Area Assessment for Radstock)

The emphasis within conservation areas is on ensuring that local character is strengthened, not diminished by change. The local community is not opposed to change and recognises that the existing buildings on the whole of the former Radstock Infants School site do little to enhance the area. However, replacing them with a traveller site would neither enhance nor be appropriate within the landscape / setting and certainly wouldn't strengthen the local character of the built environment.

In the Conservation Area Assessment 1999 for Radstock it clearly states that;

Planning decisions should take account of the character and appearance of the conservation area. [1.1.3] (Conservation Area Assessment for Radstock)

It also goes on to say that;

Enhancement and management in this area should seek to respect the historical linear form of development and the relationships between the open areas of landscape and the developed areas. (4.6.5) (Conservation Area Assessment for Radstock)

The significance of conservation area status is evidently recognised and this is set out as a recommendation when assessing traveller sites that:

Sites should not be located within 1.5km of a Conservation Area. {Q.9 4.34 } (Statement of Consultation)

It is also noted that when making the site assessment for Bath Old Road B&NES states that;

'In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable.' (Appendix E: Detailed Site Assessment Tables)

I would draw attention to Draft Core Strategy CP11 that traveller sites should;

..'not harm the character and appearance of the surrounding area.'

How does the new National Planning Policy Framework relate to Conservation Areas?

Firstly, Conservation Areas are designated heritage assets, so great weight should be given to their conservation also [para. 132] (National Planning Policy Framework)

There is a positive obligation to look for opportunities to enhance or better reveal the significance of a conservation area [para. 137] (National Planning Policy Framework – Mar 2012)

and that

'account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, their potential to contribute to sustainable communities and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.' [para 126 & 131] (National Planning Policy Framework)

It is very difficult to see how placing a traveller site within Bath Old Road and the Radstock Conservation Area would meet

the criteria set out above.

Secondly, it is noted that:

‘Local planning authorities should identify and assess the particular significance to any heritage asset that may be affected by a proposal.’ And that, ‘They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.’ [para. 129] (National Planning Policy Framework)

There is no evidence to suggest any such assessment has taken place.

It is believed that the Sustainability Appraisal Report (SA) of Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocation Development Plan Document was an attempt to undertake such an assessment. Indeed, in Table 3.2 Summary of the sustainability issue identified for the Gypsy & Traveller Site Allocations DPD (p.15) recognises Conservation Area status.

However, in Table 4.1: Summary of the Significant and Secondary, Cumulative and Synergistic Effects of the Issues identified within the SA - NO mention is made of the sites conservation area status (p.28/29).

Instead, it states:

GT.4 Former Radstock Infant School canteen, Radstock

This site is one of the best performing of all sites assessed.

Significant positive benefits are identified as against social, environmental and economic objectives due to the sites location within the urban area of Radstock, close to local services and facilities, its reuse of previously developed land, and the provision of a small scale site within an existing residential area.

The ability of site residents to access education and healthcare services is a particularly significant benefit of the site which would enable continued access into the long term.

The only negative impacts arising from the use of this site for allocation are against access to work opportunities (Objective 5) due to the low availability of work opportunities in the area, and Objective 10, reducing pollution, due to the introduction of additional sources of pollution at this location.

Mitigation and enhancement measures have been identified that would offset the impact of a number of these impacts. Due to the significant number of positive impacts against the SA objectives, this site is recommended for allocation. . (Sustainability Assessment)

What is of some concern is that NO mention is made of Objective 8 - Protect and enhance the district’s distinct historic, environmental and cultural assets. (Sustainability Assessment)

Further, NO mention is made of the conservation area status in Appendix D – Full Assessment Matrices.

In fact, the only assessment and reference made of Objective 8 is made in the overall commentary.

All that could be said was that:

‘the removal of the existing derelict building is likely to improve the townscape.’ (Sustainability Assessment)

Firstly, it is doubtful that simply demolishing the canteen, replacing it with a traveller site whilst still leaving the other derelict buildings in place would do anything to ‘improve the townscape’.

Secondly, It is difficult to see how a single sentence provides any assessment as required in Para.129 (National Planning Policy Framework) or Para. 132 where it states that

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to that asset’s conservation.’ (National Planning Policy Framework)

This leads us to believe that the Sustainability Assessment has ignored the significance of the Conservation Area status and is therefore flawed.

Indeed, in the initial scoring matrix used to identify potential sites, whilst recognising that the site was in a Conservation Area, there was no score given for such status which again ignores the importance of this important heritage asset.

Furthermore, there is some concern that the demolition of the existing wall fronting the canteen site and used to form the boundary to the former gardens on the site would be a significant loss to the streetscape.

It would appear that this wall would need to be demolished to provide access and egress to the site.

Again we would draw attention to statement 6.3 of the B&NES Gypsy and Traveller Sites – Outline Landscape Assessment – March 2012 Rev. B which was acquired under a Freedom of Information Act request and was not part of the DPD. It clearly advises that:

6.3 The importance of the stone wall to the frontage should not be underestimated and there is a need to respect and reflect the existing building line.

This advice has been ignored, however the same document also goes on to state that:

6.4 If this site were to be developed on its own, then the need for vehicle access would remove most of the frontage wall which would generally be unacceptable.

Bath Old Road Action Group is somewhat bemused that all recommendations and advice from its own Planning Department has been ignored.

HIGHWAYS, ACCESS AND SITE CONSTRAINTS:

To date it appears that no Highways Assessment has taken place for the site. We would draw attention to Draft Core Strategy CP11 which states that when assessing suitability for traveller sites that there is a requirement that:

'satisfactory means of access can be provided and the existing highway network is adequate to service the site.'

There are significant constraints in terms of access onto the site due to existing resident parking on both sides of the street allowing for a single car to pass along this stretch of road.

It is doubtful that a large trailer would be able to pass along the road let alone turn into the proposed site.

Current resident parking would have a negative impact on visibility up and down the road for anyone attempting to leave the proposed site.

Whilst this appears to have a major safety implication our advice would suggest that remedial work to make egress safe would potentially require a 1.4m x 43m visibility splay. This would remove existing resident parking and add further pressure onto an already congested street. Indeed, this is recognised in B&NES Detailed Site Assessment which states that. 'Access on the site may require works to make safe to take account of the need for visibility.'

The road is used as a 'rat run' between the A367 and Radstock town centre and attracts significant volumes of additional traffic during peak hours. Many of the vehicles using this short cut exceed the 30mph speed limit due to the gradient and it is envisaged that further traffic calming measures may be required to make this road safe for residents accessing and egressing the proposed site, again putting further pressure on this residential street.

We would also draw your attention to a 'confidential' email between Meghan Rossiiter (Senior Planning Officer) and David Holmes (Team Leader – Highway Development Control) dated 20th March 2012 via a Freedom of Information Act request that clearly states:

19 Bath Old Road – Access to the site is poor. There is residential development to the south, with parked cars on either side of the highway in part, and single track road to the north. This affords poor passing opportunity which would be exacerbated by the need for larger vehicles or vehicles towing to use his route.

We also believe that the width of the site also constrains the development as a Gypsy/Traveller site.

In reviewing the Designing Gypsy and Traveller Sites – A Good Practice Guide published by the DCLG in May 2008 we noted the following criteria:

4.27 Access roads on site should be 3.17m wide.

4.30 Roads should be constructed to an adoptable standard.

4.13 A 3m boundary around the perimeter to act as a fire break.

4.47 Density no less than 6m from another caravan/trailer

We are also aware that a pitch should have 2 parking spaces each and that each individual car parking space should measure 2.4m x 4.8m. 4.44

4.43 Recommends the use of Soft Landscaping on the site and finally 4.17 recommends that enough space should be provided to permit easy manoeuvrability of residents own living accommodation both on to the site and subsequently onto the pitch. With the use of mobile home type accommodation up to 25m in length it is difficult to see how this would be achieved. Even with average size trailers of 15m this may prove difficult.

When viewing the plan outlined in the Preferred Options document, this thin strip of land, would need to accommodate all of the above PLUS:

Amenity Building,

A touring Caravan (per pitch)

Drying space for clothes

Lockable shed

Small Garden

As well as providing adequate screening. Screening is an important consideration for this site and should be noted. (We address this issue when assessing impact on resident's amenity value on the following page.)

However, despite the inability to actually fit all these requirements onto the land we are also concerned that the recommendation for 2 pitches on the site would lead to overcrowding.

B&NES own figures of 500m² as a single pitch size presents problems when the whole site is only 0.05 Hectares (500m²) – So the site can actually only accommodate 1 pitch, not 2.

We draw the council's attention to Core Strategy Policy CP11 which states the criteria that:

'The site is large enough to allow for adequate space for on-site facilities and amenity, parking and manoeuvring as well as any commercial activity if required.'

Given all of the information available and our rudimentary assessment it is clear that this criterion cannot be met and that an inadequate assessment of this site's potential use has been carried out.

How will the proposed site affect residential amenity?

No robust assessment has taken place as to the impact on residential amenity of either the existing residents or proposed occupiers of the Gypsy and Traveller site.

We draw attention to Core Strategy Policy CP11 which states:

Use of the site must have no harmful impact on the amenities of neighbouring occupiers

6.5 of the Outline Landscape Assessment – March 2012 Rev.B states:

'If the scheme were to proceed then a robust and substantial scheme of planting to each side of the longer side boundaries would be required together with a management scheme and retention of the rear boundary vegetation.

This planting would undoubtedly impact the residents of No. 19 Bath Old Road and would have to be extremely high to inhibit views into the proposed site. The vegetation (Laurel hedge) to the rear of the site is owned by the residents of properties in Bristol Road and would therefore not be able to be effectively managed. No mention is made of the views into the site by residents on Bath Old Road who front the site.

Further, it is not possible to assess the impact on residential amenity to any potential development on the rest of the school site. Presumably any design will not be able to have second storey windows on the south side of any building sited adjacent the boundary.

Even if we ignore existing resident's amenity, Travellers themselves will be overlooked by the existing settled community. Due to the physical constraints of the site there will be no opportunity to ensure appropriate levels of privacy for residents on the proposed site are provided.

Alternative Use of Site

We draw the councils attention to the comments made by B&NES Property Services in the document Gypsy & Traveller Site Selection Exercise 2012 prepared by Property Services in advance of the Planning Department's district wide 'Call for Sites' for consideration of potential Gypsy & Traveller sites to be included in the subsequent consultation.

It recommends that the canteen site would be:

Prudent to hold/dispose with the wider school site

However this advice has been ignored.

We refer to 6.6 of the Outline Landscape Assessment – March 2012 Rev.B which states that:

We consider that a well designed residential terrace would be more appropriate

And 6.4 that states:

We think it important that the notion of developing both sites as a whole is considered.

Again, this was ignored.

As has been the Strategic Land Availability Assessment (SHLAA) – Report of Findings-May 2011- Appendix 1 dii that identifies the whole school site as having potential for 14 dwellings.

It is widely felt that this would be a more appropriate development in a residential area when viewed alongside the designated conservation area status.

To conclude, it is our position that the development of the site as proposed would fail to be in accordance with criteria b, c and e of Policy HG16 and criteria b, c, d and f of emerging Policy CP11.

Given all the arguments presented above, Bath Old Road Action Group feel that the proposals contained in the Gypsies, Travellers and Travelling Showpeople DPD for site GT.4 is deeply flawed. The evidence base is out of date and the process of allocation is unfounded, in particular the many constraints and limitations of sites have not been fully explored.

We firmly believe the development of the site as proposed is inappropriate, it remains to be established whether development is actually achievable, but not withstanding this the site is fundamentally unsuitable and as such should be removed from the Preferred Options document forthwith.

Respondent: 1449 / 1 Name: Mrs Dominique Russell SILCM Organisation: Radstock Town Council

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

The council welcomes BANES Council making progress on the consultation, there are a number of concerns we wish you too consider:

1. The site is in a Conservation Area - the Council has concerns about how a site would impact on the street scene and principles of the conservation area. It is understood an application for the planning permission to build houses on the adjacent site was refused on the grounds of design.
2. The site has the potential to be used for a variety of other uses including affordable housing which is needed in Radstock.
3. The site is small (two pitches) and does not support the culture of Gypsies, Travellers or Travelling Showpeople who live with extended families. From you papers it was not clear that adequate consultation with the travelling community on the suitability of this site had take place. The council believes this is paramount in accurately addressing the needs of this community and avoiding isolation.
4. There are other potential sites in Radstock, however as the Council does not own them, they cannot put them forward for consideration.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3033 / 1 Name: Mr Chris York Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site selected at Bath Old Road is neither suitable nor achievable and should not have been shortlisted. Very clearly the guidance of the new policy 'Planning Policy for Traveller Sites' and the guidance contained in the Policy Impact Assessment Paper have not been followed. Circulars 2006 and 2007 have been cancelled. Outdated GTAA information should not be used, proper local needs assessment are called for. Early local consultation is mandated. Proper weighting of the impact on the settled community is required. Not evident in the criteria and site selection matrix used.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree:-

The road access is not used suitable to service safely a permanent site of two pitches with all the vehicles suggested in the guidance document and the likely business comings and goings of cars and large vehicles. Taken together with the daily 'rat run' traffic and parking needs of the settled resident community this would lead to traffic chaos and an unsafe situation for residents and children going to school etc. This is not a 'safe road' planning proposal.

The concept of effective screening to satisfy current residents and possible users of the remainder of the site is not possible. This screening concept and planning assumption is not valid. The development as a traveller site would have a very negative effect on the local environment and the amenity of the adjacent land and the value of residents houses and property.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree.

The site is within a Conservation area. We should follow our local planning rules

The site cannot be made a 'safe ' from a traffic and access perspective.

A developed site with have major negative impact on the amenity value and financial value of residents property; it will

cause planning blight for the remainder of the site and likely lead to a creeping use of the site by more travellers. Screening is not a viable plan.

Site selection and the allocation process have not followed the new Planning Policy guidelines, the NPPF, nor the new Planning Policy for Traveller Sites

This site in Bath Old Road should be for the local community...such as Allotments and a site for a nursery school..... in line with its original purpose and use

Do you have any other general comments on the Preferred Options paper?

The Preferred Options Paper and the process followed draws from the guidance of the now defunct Circulars 2006 and 2007 and old planning documents.

The consultation methods followed did not comply with the guidance and the spirit of the new policy guidance of early local community involvement and proper needs assessment.

The site selection matrix requires rebalancing to include impact on the settled community and the impact of the amenity value of adjacent land plus the likely relationships with the settled community. These criteria are clear in the new planning policy document, they need to be in the matrix.

Respondent: 3035 / 1 Name: Mike Renton Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The evidence that I have is that the site at Bath Old Road is not suitable as it has poor access, is totally overlooked, no parking, very busy road, in a conservation area. Travellers would also have their mobile caravans which would be impossible to manoeuvre in and out of the proposed site and there would certainly be no room to park them on the road.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I don't agree, they have totally under estimated the position and effect the site would have on a already saturated area for traffic and parking. The site is very close to neighbouring properties and is overlooked from all sides. A travellers site will not be in keeping with our conservation area.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I don't as the pitch is totally unsuitable for the travellers and the local community.

Do you have any other general comments on the Preferred Options paper?

Not enough information was made public knowledge. The first most people know about this was when it was published in the Somerset Guardian. Simon Allen was asked to attend out first meeting to what we thought was to support us. We unanimously agreed that we didn't want the proposal to go to consultation. He went against our wishes and voted yes to this even though he too agreed that the site was totally unpractical and would be a disaster to the local community.

Respondent: 3035 / 2 Name: Mike Renton Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Our family have owned our house in Bath Old Road for the last 52 years. In this time we have seen a huge increase in the traffic using the road as a short cut, sometimes at high speed. The road has been known to be at a standstill at rush hour,

school time or if the main road has been blocked.

The parking as it stands now is ridiculous with cars parked nose to tail up both side of the road.

Today for example a ambulance had to block the road whilst it dealt with a casualty as there was no were for it to park.

The site entrance would take up valuable parking places and cause more congestion.

How will large caravans be able to manoeuvre in such a tight space to get in to the site the first place?

What plans are to be put in place to stop these travellers taking over the whole school yard next door?

With a site here nobody will even consider doing anything with the old school yard as any housing would not sale due to the site.

The site would spoil the area in sight and feel which should not be allowed to go ahead as the Radstock is a conservation area.

A huge concern would be the loss of value to our properties in this area if they will sale at all.

If the site goes ahead who will be responsible for the up keep ,presentation hygiene etc?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3038 / 1 Name: Maria Foxwell Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes, unsuitable access, overlooking or within the measurements set out by the government - for example too close to other residential buildings and in a conservation area.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3038 / 2 Name: Maria Foxwell Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I would like to express my concerns over the proposal for a traveler site at Bath Old Road, Radstock. I have recently attended a meeting at Whisty Hall where Simon Allen was present aswell as many local residents from this area. All the residents feel the same over the proposal and truly believe this is an inappropriate site for travelers. My own concerns are as follows

1. Access to the site
2. Value of our houses going down
3. Traffic on Bath Old Road
4. Number of pitches

5. Schools

Firstly, the access to the site is so tight as the road is completely jam packed with cars parked either side from the residents that currently live on the Road. There is not enough parking for them so to take away on road parking from local residents to make way for a entrance to fit caravans in freely is not at all right.

Secondly, already I have spoken with 2 local residents (Woodborough road) they have both had offers put in on their houses and then have had them taken away due to the possibility of travelers moving right in the centre of the community and this already has had an effect let alone what it will do to the rest of the house values if you did agree to let them move to the site. Surely you cannot expect the residents to be happy with this decision and live in harmony with the travelers knowing that our houses will be worth nothing!

Thirdly, the Traffic on Bath Old Road is totally crazy now as many cars use this route as an escape route to bypass the Main Route from Bath to Radstock. To put a site in the middle of this kaos is even more crazy as this will only hold up traffic on single road that is currently there.

Number of Pitches, already I am on the understanding that 1 pitch= 3 caravans

Lastly, if travelers move in and they have children I suspect they will need to go to a school? Well Academy of Trinity and Radstock Primary are both already full for September and do you honestly think that it would sit well that if other local children did not get in but children from this site did after only just moving here then this again would cause a lot of upset for local residents.

The site is far too close to housing that people work hard to keep going and pay for with honest working. It isn't easy on any of us at present and this is a complete insult to us to even think that we are just going to sit back and let you even consider this site as a traveler site.

We will be fighting this all the way. Please do not under estimate the People in Tynning area as we will not allow you to use our area as a dumping ground. We are all working hard to make this area better and prosper but how can we when our own council are even considering Bath Old road as a traveler site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3040 / 1 Name: Elizabeth Button Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The Bath Old Road site is inappropriate.
 The Stanton Wick site is in the Green Belt
 The Keynsham site requires trees to be cut down.

None of these sites are suitable.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO for the opportunities- It is in a conservation area- if houses were turned down as being inappropriate then caravans are not suitable.

- Access and visibility are not good and any improvement to this make the parking for residents even more difficult.
 -Use of this small parcel of land would make it more difficult to develop adjacent site in a sympathetic manner to fulfil the needs of the community.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No- this site is not suitable as allocation for travellers.

Do you have any other general comments on the Preferred Options paper?

In general it appears that common sense has not always been applied and BOR site goes against governments NPPF

Respondent: 3040 / 2 Name: Elizabeth Button Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. There is not room for 2 caravans on this site. Screening would be needed on more sides.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

- It is a conservation area.

- Access is a problem on Old Bath Road.

Previous housing was turned down as not appropriate in a conservation area so why are caravans appropriate?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3040 / 3 Name: Elizabeth Button Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I just want to add my voice to the many who are pointing out that bath old road is completely unsuitable as a travellers site. It is in a conservation area, very close to houses and the road has major parking problems. There are far more suitable sites even in the Radstock area. I understand that a consultation process now has to take place. It is a complete waste of public money for this site to have been left on the list.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3042 / 1 Name: Jack Marriott Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Any relevant evidence or information is presented throughout my responses in support of my many concerns over the suitability of the proposed Bath Old Road site.

The main areas of concern, which lead me to believe that the Bath Old Road site is wholly inappropriate are:

*Bath Old Road is designated as a conservation area , therefore the development of a gypsy and traveller site in this area would be contradictory to the B&NES description of the purpose of such a designation which is set out in the document 'Living in a Conservation Area'.

*The congested nature of Bath Old Road is such that it will not be possible to provide suitable and safe access to the proposed site, with acceptable levels of visibility, without significantly worsening the existing congestion and parking issue on the road.

*There is a need for additional affordable housing in Radstock and the proposed site, and the wider neighbouring school site, would be far more suitable for the development of housing (in keeping with the surrounding area) than for the development of a gypsy and traveller site. In the B&NES Housing Land Availability Assessment (SLHAA - Report of Findings - May 2011 - Appendix 1 dii) the whole school site is recognised as having potential for 14 dwellings.

Given that Bath Old Road is not a suitable option, the council should look to alternative plots including the three Ministry of Defence sites at Foxhill, Ensleigh and Warminster Road, which will soon become available (and are currently earmarked for housing development). These sites would make far more suitable gypsy and traveller sites. If there is a need for additional housing within the council, then some of the sites within the Preferred Options paper should be re-considered for this purpose, including Bath Old Road.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the councils assessment of opportunities and constraints on the Bath Old Road site.

The Preferred Options paper states that "Development of this site within the Radstock Conservation Area, and surrounded by residential properties would require sensitive pitch design to maximise residential amenity and privacy. Existing screening at the site would assist with this aim." The only existing feature of the site which effectively screens the site from view at road level is the old stone wall running parallel to the pavement at the front of the site. In appendix E of the detailed site assessment carried out by B&NES it is stated that "Works would be required to make the site suitable for residential use, including the demolition of the existing building and the boundary wall to the front of the site." Not only would the demolition on the old stone wall fronting the site be damaging to the character of the conservation area, but it would also effectively remove the only existing feature of the site which screens it from the road and from the neighbouring houses. Given the narrow width of the site and the poor access from the road, it is likely that the majority of the front of the site will be open for access thus leaving little scope for sympathetic screening. In addition, given that the majority of the neighbouring houses have views of the site from a high level, including loft conversions, no amount of "sensitive pitch design" of screening would give the gypsy and traveller residence the level of privacy required. Neither will the screening be able to obscure the view of caravans/trailers, which will be alien within the surrounding setting and thus damaging to the character of the area.

The Preferred Options paper also states that "Access to the site may require works to improve visibility." Given the congested nature of the road and the existing on street parking, it is likely that in order to provide the necessary levels of visibility in order that the site can be entered and exited safely, it may be necessary to restrict the level of existing residential parking at the front of the site. This will have a significant effect of the amount of on street parking available for local residents and will exasperate the existing parking issue on Bath Old Road.

Finally, it is stated in the Preferred Options paper that "[The sites] reuse as a permanent Gypsy site would make efficient use of previously developed land." and that "The development of this site would meet a need for a small residential (permanent) site." Given the narrow width of the proposed site and the larger than average size of the vehicles which may require regular access, I would presume that it will be necessary to allot a significant proportion of the site, along the majority of its length, for access and turning. As such, I do not feel that such a development would be an efficient use of the land. Development of affordable housing on the site in conjunction with the wider neighbouring school land would potentially be a much more efficient use of the land. This would meet the need for affordable housing and could also be developed in a way much more in keeping with the surrounding houses and therefore maintain or even enhance the character of the road. In the B&NES Housing Land Availability Assessment (SLHAA - Report of Findings - May 2011 - Appendix 1 dii) the whole school site is recognised as having potential for 14 dwellings.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, for the reasons given above and below I believe that the proposed Bath Old Road site is wholly inappropriate and I am therefore strongly opposed to the pitch being taken forward as a formal allocation.

Do you have any other general comments on the Preferred Options paper?

I have included below some additional and expanded comments.

Firstly, and most importantly, Radstock is a conservation area with a rich heritage and Bath Old Road is currently a street which very much reflects this, with period houses lining both sides of the street. B&NES Planning Department outlines purpose of the conservation area designation in the document 'Living in a Conservation Area', it is clearly stated that "Conservation Area designation (provides)... the basis for policies designed to preserve or enhance all aspects of the character or appearance of an area that define its special architectural or historic interest." It is my opinion that the proposed gypsy and traveller site would be a direct contradiction of this and that no amount of sympathetic landscaping could mitigate the negative impact that the presence of caravans and trailers would have on the character of the road. This will be particularly evident for myself, living at Number 72, as the proposed site is in full view of all of my frontward facing windows. B&NES Policy CP11 of the Draft Core Strategy, which includes a number of requirements for assessing traveller site suitability states that a site must "not harm the character and appearance of the surrounding area", and in Appendix E of the Detailed Site Assessment for Bath Old Road, B&NES state that "In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable." I, therefore, feel that the proposed development is completely inappropriate on these grounds alone.

Another important issue that should be considered when reviewing the proposed development is that of road access and safety. Bath Old Road is already a congested street with cars parked on both sides of the road on a 24-hour basis, leaving only a narrow carriageway for traffic to pass. The road is also used as a 'rat-run' in the mornings and evenings as motorists attempt to avoid traffic on New Bath Road. Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that "satisfactory means of access can be provided and the existing highway network is adequate to service the site." It is my opinion that this criteria is in no way met by the proposed Bath Old Road site. Currently it would be very difficult to drive a car towing a trailer from one end of the road to the other and would be practically impossible to manoeuvre the same vehicle onto the site based on the current site access and on-street parking. Visibility is also very limited when pulling onto the road and this is a serious safety concern. In order to allow realistic access and room to manoeuvre larger vehicles in and out of the proposed site, with acceptable levels of visibility, significant parking restrictions would be required in the vicinity of the site and this would have a significant impact on all of the existing local residents on a road that is already over congested with parked cars. It should be considered that a proposed housing development on the land neighbouring the site was rejected on planning grounds in part due to parking issues.

In addition to the above issues, the site is overlooked by all of the immediately surrounding houses, many of which (including mine) have loft conversions offering views of the site from a height. Therefore, not only will the site detract from the character of the area visible to all neighbouring properties, but the site will also not provide the level of privacy that the settling gypsy/traveller community would be entitled to.

I would also like to add that I believe the format of this response form and the questions asked within are not fit for purpose. There seems to have been little consideration of how the form will be interpreted and completed by local residents such as myself and seems to meet only the councils requirements. There is no supporting information as to how the form should be completed the questions asked within are ambiguous to varying degrees. Many of the comments I have included within my response could equally have been included within different sections of the form and still have been relevant to the heading of that section.

Respondent: 3042 / 1 Name: Jack Marriott Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I, Jack Marriott (25), and my partner, Holly Prichard (26), secured a mortgage for our first house, on Old Bath Road, in June 2011. We have both worked very hard to get ourselves onto the first rung of the property ladder and are extremely concerned over the proposed plans to develop and Gypsy and Traveller site on the old school land opposite our house, and the impact that we feel this development would have on the local community and amenities.

There are a number of reasons that we feel make the proposed development wholly inappropriate.

Firstly, and most importantly, Radstock is a conservation area with a rich heritage and Bath Old Road is currently a street which very much reflects this, with period houses lining both sides of the street. B&NES Planning Department outlines purpose of the conservation area designation in the document 'Living in a Conservation Area'. It is clearly stated that "Conservation Area designation (provides)... the basis for policies designed to preserve or enhance all aspects of the character or appearance of an area that define its special architectural or historic interest." It is our opinion that the proposed gypsy and traveler site would be a direct contradiction of this and that no amount of sympathetic landscaping could mitigate the negative impact that the presence of caravans and trailers would have on the character of the road. This will be particularly evident for us, living at Number 72, as the proposed site is in full view of all of our frontward facing windows.

B&NES Policy CP11 of the Draft Core Strategy which includes a number of requirements for assessing traveller site suitability states that a site must "not harm the character and appearance of the surrounding area", and in Appendix E of the Detailed Site Assessment for Bath Old Road, B&NES state that "In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable." We therefore feel that the proposed development is completely inappropriate on these grounds alone.

Another important issue that should be considered when reviewing the proposed development is that of road access and safety. Bath Old Road is already a congested street with cars parked on both sides of the road on a 24-hour basis, leaving only a narrow carriageway for traffic to pass. The road is also used as a 'rat-run' in the mornings and evenings as motorists attempt to avoid traffic on New Bath Road. Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that "satisfactory means of access can be provided and the existing highway network is adequate to service the site." It is our opinion that this criteria is in no way met by the proposed Bath Old Road site. Currently it would be very difficult to drive a car towing a trailer from one end of the road to the other and would be practically impossible to maneuver the same vehicle onto the site based on the current site access and on-street parking. Visibility is also very limited when pulling onto the road and this is a serious safety concern. In order to allow realistic access and room to maneuver larger vehicles in and out of the proposed site, with acceptable levels of visibility, significant parking restrictions would be required in the vicinity of the site and this would have a significant impact on all of the existing local residents on a road that is already over congested with parked cars. It should be considered that a proposed housing development on the land neighboring the site was rejected on planning grounds in part due to the limited on-street parking.

In addition to the above issues, the site is overlooked by all of the immediately surrounding houses, many of which (including ours) have loft conversions offering views of the site from a height. Therefore, not only will the site detract from the character of the area visible to all neighboring properties, but the site will also not provide the level of privacy that the setting gypsy/traveller community would be entitled to.

Thank you for taking the time to read our objections. Having lived on Old Bath for one year now, we are very settled in our home and in this peaceful community and hope that you will share our view that the proposed Gypsy and Traveller development is inappropriate for Bath Old Road.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3054 / 1 Name: Mr Peter Kirkland Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

No.

Respondent: 3059 / 1 Name: Elizabeth Derl-Davis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site in Radstock Centre Ward
There is a possibility that the proposed land is owned by St. Nicholas Church and therefore unavailable. I've also heard that there is a developer who has submitted a counter-proposal to develop the site for permanent housing.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

The proposed site is within the town centre. Most travellers, etc. seem to prefer their sites with more open space. I recognize this group should be entitled to permanent pitches but I think a less built up area of Radstock would be a better location.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3061 / 1 Name: Mrs Susan York Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site is in Bath Old Rd. Ownership of the Land There is some query as to who actually owns this land as it was gifted by Lord Waldegrave in 1903 for the education of the poor in the area under the School Sites A in 1841. There is possibly "rights of reversion" where the land should have been returned to him when it ceased to be the site of Radstock Infants School in 2007.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No! I strongly disagree with the council's assessment of opportunities. The site is very restricted in size and would impinge on the local houses. There is no way that the site could be adequately screened either to the side or to the front without losing access or light and privacy for those living close to the site. Its' situation is far too close to other residences which is not beneficial to either party. A proposal for a number of houses on that site was refused planning permission on the grounds that they would be overlooked and overlook the properties in the road and also that they didn't meet

conservation standards of building. Surely a number of caravans/trailers will not meet the necessary visual impact for a conservation area such as Bath Old Road.

The access to this site is appalling. The road is badly congested most of the time with parking on both sides of the road. Traffic uses Bath Old Rd as a "Rat Run" during rush hours to avoid the congestion on the main road.

The access to the canteen site would be impossible. The wall would have to be knocked down (is it protected by conservation or by the original provisos from Lord Waldegrave stating a wall to be built to protect the site?)

The rest of the site would be under scrutiny as well. If the planned proposal for a traveller/gypsy site goes ahead, what will happen to the rest of the land? There will be an unwillingness for any development of that land for residential purposes. So could this be the thin edge of the wedge? Does BANES have its' eye on the rest of the site for future proposals up to 2016. I wonder!

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No! The potential pitch provision states that it would provide 2 permanent pitches for that site in Bath Old Road. What is misleading to most peoples is that a pitch does not just constitute 1 static home or caravan, but can provide room for 1 static plus 1 travelling caravan plus a shed plus an amenities building plus bike parking plus car parking. That means at the least 2 mobile homes, 2 caravans, 2 sheds 2 amenity buildings, parking for 4 cars and bikes. The definition of a pitch is vague to say the least! One description states a pitch is where a single household lives. Define household! It also states that people sharing at least 1 meal once a day would be entitled. How long is a piece of string?

This site is far too small for all of this.

Do you have any other general comments on the Preferred Options paper?

Preferred Options document

2.3 Has the council recently assessed the need of travellers (the last assessment done in 2007?)

Is the council applying the 2012 Government guidelines or is it trying to pass this through on old ruling?

1.6 States that early community involvement should happen. The first we knew about this site was being considered was from the local free paper. The Radstock Council denied any knowledge of consultation at the council meeting and by manipulation of the consultation dates; the council were unable to include discussion in the latest council meeting. The next opportunity being in June. All this appears to be against the recommendation and the spirit of the new guidelines that early involvement should occur.

Respondent: 3061 / 1 Name: Mrs Susan York Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

My main objection being that this is a totally unacceptable site, both for the local residents and for the travellers themselves. The area is small and the complete screening from other houses would be impossible. There would be a lack of privacy on both sides.

The BANES detailed site assessment tables have ruled out other sites, including the County Bridge site in Radstock which states 'the Sensitivity due to the location with significant overlooking from neighbouring residential and commercial properties makes this site unsuitable.' There are other examples in this document which also state this as a cancelling factor. Why proceed with the Bath Old Road site?

The access to this site is impossible. There are a large number of cars parked already in the road changing the road into a one way system for parts of the day. This is already a difficult and sometimes dangerous situation for the current residents,

to add to this with large vans and mobile homes would be a nightmare.

Radstock, including Bath Old Road is in a Conservation area and has been since the 1990's. We are trying to conserve the nature of this area and so we believed were the council, when planning for housing on that site was not allowed, due to the fact that some of the proposed building was not up to conservation standards. Would 2 traveller sites with 2 static vans, 2 mobile homes and all the other vehicles which go with travellers be more acceptable? I think not!

This I believe has not be thought through by the BANES council but the proposal has been somewhat rushed through to gain brownie points or as a panic measure to meet government targets.

It has affected a number of lives here in the road. People unable to sell their homes. People loosing income as they have been unable to move with house sales falling through. People unable to think about moving on because of the falling amenity value of their home making that impossible. The proposal (which we heard about from the local free paper, not from any notification from BANES) is flawed as it follows the old guidelines, not the latest guidelines from central government.

Respondent: 3061 / 2 Name: Mrs Susan York Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

My main objection being that this is a totally unacceptable site, both for the local residents and for the travellers themselves. The area is small and the complete screening from other houses would be impossible. There would be a lack of privacy on both sides.

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Radstock, including Bath Old Road is in a Conservation area and has been since the 1990's. We are trying to conserve the nature of this area and so we believed were the council, when planning for housing on that site was not allowed, due to the fact that some of the proposed building was not up to conservation standards. Would 2 traveller sites with 2 static vans, 2 mobile homes and all the other vehicles which go with travellers be more acceptable? I think not!

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It has affected a number of lives here in the road. People unable to sell their homes. People loosing income as they have been unable to move with house sales falling through. People unable to think about moving on because of the falling amenity value of their home making that impossible.

The proposal (which we heard about from the local free paper, not from any notification from BANES) is flawed as it follows the old guidelines, not the latest guidelines from central government.

Respondent: 3095 / 3 Name: Mr Joe Evans Organisation: Avonside CPRE

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

This site is located within a Conservation Area; the issues around the placement of a Gypsy and Traveller Site within a Conservation Area are probably best expressed within the B&NES Gypsy and Traveller Site Detailed Sites Assessment Document:

'In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable.' [Appendix E of the Detailed Site Assessment for Bath Old Road site]

We are also concerned about highways access for this site. Bath Old Road is a narrow, congested street with severe shortages of on-street parking spaces. A Highways Assessment is essential to clarify whether the access and parking problems involved with the site can be resolved in a satisfactory manner.

It should also be noted that access to the site will only be possible if the stone boundary wall at the front of the site is demolished to allow access, both for caravans and for off-street parking. Within a Conservation Area, the removal of old boundary walls in local stone to provide off-street parking is not normally permitted.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

1. Evidence base

We question the validity of the current evidence base for the needs of Gypsies and Travellers and its compliance with current government policy. The 2007 Gypsy and Traveller Accommodation (and other needs) Assessment has been used as the basis for this process. However, at five years old, it cannot be taken as an authoritative guide to the needs of a population that is by definition transient and fluid. Paragraph 4 of the DCLG's 'Planning Policy for Traveller Sites' of March 2012 states:

"...that local planning authorities should make their own assessment of need for the purposes of planning"

B&NES Council has clearly not made its own assessment of need as required; it has relied on five year old regional research. B&NES Council's own Site Assessment Report states:

"The precise need for sites to meet the new national policy will require a review of the GTAA study, preferable [sic] at the West of England level." [para. 1.4]

This has also not yet been carried out.

The March 2012 Planning Policy also states:

"In assembling the evidence base necessary to support their planning approach, local planning authorities should:

1. pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)
2. co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities
3. use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions."

Because B&NES has not carried out its own research, it does not comply with this policy, having had no new formal consultation with travellers on their accommodation needs.

Because older research is being used, B&NES Council will not have a 'up-to-date understanding' of travellers' needs as required.

In failing to comply with the first two requirements, B&NES Council has not created a 'robust evidence base' and thus does not comply with the third requirement.

We are calling for a fresh process of evidence-gathering to inform a revised list of possible preferred sites based on up-to-date evidence.

2. Requirements of different travelling communities

The DPD recognises that the needs of travelling showpeople are different from those of gypsies and travellers [2.7].

However, it does not recognise the different and sometimes incompatible needs of New Travellers, Romany Gypsies and Irish Travellers. These groups do not always have harmonious relations with one another and B&NES Council's previous consultations suggested that enough land should be allocated to allow groups to live separately from one another [3.3].

The current proposed preferred options list places 15 of 25 permanent places on one site, the Old Colliery at Stanton Wick. This would not allow different groups to live separately from one another and would thus not meet the aims set out at 3.3. We would argue that a larger number of small sites would better meet travellers' needs than the current list. It would also minimise the impact on settled communities.

This is back by Paragraph 4.6 of the B&NES Council Issues and Options Report on this subject, which states:

"The need for smaller sites in Bath & North East Somerset district is supported by the West of England GTAA which found that most surveyed respondents expressed a preference to live in smaller family-sized sites of no more than five pitches."

We would like to see an analysis of the different needs of the different sectors of the travelling community as part of the new evidence-gathering process mentioned above.

3. Green Belt

Policy E (para. 14) of the March 2012 policy states:

"Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. "

This is backed by the National Planning Policy Framework. Government policy thus prevents the development of Gypsy and Traveller Sites in Green Belt except in very special circumstances. We do not feel that this requirement has been met by the current process. Of the six proposed Preferred Sites, GT1 (Woolard Lane), GT 2 (Old Colliery, Stanton Wick) and GT8 (Lower Bristol Road) lie within Green Belt. The only justification given for the 'very special circumstances' required to approve development in Green Belt is that no other sites are available. The Sites Assessment Report states:

"The absence of appropriate land outside the Green Belt to meet the identified level of need is considered to contribute to very special circumstances."

In this case, the absence of other available sites does not simply 'contribute' to the 'very special circumstances; it is the sole justification for Green Belt development.

We feel that this is plainly not sufficient to prove that 'very special circumstances' exist, especially taken alongside the out-of-date evidence base being used. If the justification for Green Belt development is that there is a need that cannot be met in any other way, then plainly the need must be derived from the most robust evidence. Equally, although the Call for Sites did not yield any other sites outside of Green Belt, such sites may well exist, especially if the principle set out above of using smaller sites rather than larger is followed.

We feel that a fresh needs assessment should be carried out to provide a robust evidence base; further work should then be done to identify additional potential sites that are not in Green Belt. The current list of preferred options should be revised, to include only those Green Belt sites for which there is robust, up-to-date evidence of need and for which it can be demonstrated that there are genuinely exceptional circumstances to justify their inclusion.

4. Flaws in policy-making processes

Although the DPD has been prepared with a process that gives the appearance of being based on assessment of evidence, it is in fact deeply flawed. The matrix used to assess the suitability of sites in the Site Assessment Report appears to have been scored in an arbitrary manner in places; furthermore, the results of the scoring matrix bear little relationship to the shortlist of sites taken through to the Preferred Options DPD consultation document. A decision was taken at the Council's Cabinet meeting on 9 May 2012 to eliminate rejected sites so as to prepare the Preferred Options DPD consultation document. At that stage, no meaningful consultation had been carried out on either the process of site selection, the needs

of the Gypsy and Traveller community in the area or the specific sites included in the process. The decision to create a shortlist before consultation had been carried out was contrary to both the 2008 Regulations on the preparation of Development Plan Documents and the 2012 NPPF, which states:

“155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

Respondent: 3097 / 1 Name: Mr Nigel Evans Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes. I am a home owner living (25+years) in the area of one of the proposed sites for "Gypsy, Traveller or Travelling Showpeople" namely "GT4 former Radstock infant school canteen Radstock".

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO.

1/ Both ends of the narrow "old Bath road" which is the only road access to the proposed site have very tight blind bends not suitable for large caravans to negotiate.

2/ Access to the site itself is extremely restricted due to the width of "old Bath road" and residents parking, please note residents have nowhere else to park and removal of any parking spaces to gain access to the site would only make the present situation much worse.

3/ Due to access problems outlined above any inhabitants of the proposed site would be at risk "HEALTH AND SAFETY" should they require an URGENT visit from either a fire engine or ambulance and therefore there safety would be put at risk by placing them on that site.

4/ The proposed site is in the middle of a B.A.N.E.S. designated conservation area which is not compatible with B.A.N.E.S. own policy for placing of travellers sites in conservation areas and against there own ruling on this matter.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO. In my opinion the proposed site "GT4" is wholly inappropriate in this area for the above reasons and should be rejected by the council immediately.

Do you have any other general comments on the Preferred Options paper?

YES. In my opinion there are proposed sites in B.A.N.E.S. own document "Gypsies, Travellers and Travelling Showpeople site allocations development plan document" better suited for this purpose, for example.

GT1 parcel 7100 Woollard lane Whitchurch, already in use as a site as outlined in BANES own document.

GT8 lower Bristol road Twerton, again already in use as a site as outlined in BANES own document.

Respondent: 3097 / 1 Name: Mr Nigel Evans Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

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Do you agree that the potential pitch provision be taken forward as a formal allocation?

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GT1 parcel 7100 Woollard lane Whitchurch, already in use as a site as outlined in BANES own document.

GT8 lower Bristol road Twerton, again already in use as a site as outlined in BANES own document.

Respondent: 3106 / 1 Name: J.M. and L.C. Tudor Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Please find below a statement of our objection to a proposed gypsy site in Bath Old Road Radstock. We would strongly urge you to reject this proposal on the basis of the points raised.

We would welcome your thoughts.

Objection to Proposed Gypsy I Travellers Site at Bath Old Road, Radstock

Background and Purpose

We acknowledge that Bath and North East Somerset Council ('B&NES') is considering the former Radstock Infant School Canteen site in Bath Old Road as a possible location for 2 permanent pitches for static caravans for use by gypsies and travellers.

We fundamentally object to this proposal on the basis of the following arguments which are many and varied:

Arguments

1. Ownership

- B&NES has not provided proof that it owns the land of the former School Canteen and is therefore not in a position to propose it as a potential site for gypsies and travellers.

- We understand the land does not actually belong to B&NES but is in fact part of the Waldegrave Estate. It appears the land was 'gifted' to the county by the Earl Waldegrave in 1903 for the education of the poor under the School Sites Act 1841.

- The Waldegrave Estate most likely has 'rights of reversion' as has been proved in other instances (i.e. B&NES should have

given it back to the Estate) when it stopped being a school.

- It is essential that the true ownership of the land is established before development of any kind is considered. Has B&NES firm and conclusive evidence that it owns the land and if so in what form?

2. Conservation

- B&NES Council itself states that gypsy/traveller sites should not be located within 1.5 km of a Conservation Area. Never mind being within 1.5 km, Radstock is a designated conservation area.

- According to B&NES document "Living in a Conservation Area", Bath and NE Somerset Council states "It is important that local people become involved in the care of conservation areas through residents' associations amenity groups and local history groups to ensure standards are maintained."

With the above "partnership" in mind, as local residents and supporters of the local residents' group BORAG we would like all the following points regarding our conservation area to be noted ensuring, that "standards are maintained".

- Static caravans (plus potentially any screening around them) will not meet any of the criteria contained in the "Living in a Conservation Area" document.. .. and as such the entire document could be quoted with regard to why the siting of static caravans in Bath Old Road would not be acceptable.

Perhaps the most pertinent references from our perspective being:

- "Conservation areas give broader protection other than listing individual buildings, all the features within a conservation area, listed or otherwise, are recognised as part of its character, as are the range of uses to which land and buildings are put" The use of land as a site for static caravans will not be in character with the surrounding limestone miner's cottages built in the 19th Century, which lie adjacent to the site on both sides and opposite.

- "There are many instances when a seemingly small alteration can damage the historic character and appearance of an area"

Examples include:

"replacing original timber doors with "off the shelf" plastic or tropical hardwood doors"

Once again, static caravans are usually constructed of metal or plastic and will therefore be grossly out of place in the conservation area -and will be an If enormous alteration" as oppose to a "seemingly small alteration" which would indeed "damage the historic character and appearance" of the area.

The document also states:

- "Replacing boundary walls, railings and hedges with materials not traditional in character"

"Consent is sometimes required for the demolition of garden walls, especially those facing a highway ... "

The above quotes seem appropriate for the boundary wall which would need to be demolished altogether to gain access to the Canteen site. This would be taking away a very old stone wall that used to enclose the 'Board School' garden which was on this site before the canteen was built.

The said boundary wall could not be replaced (even with materials in character with the conservation area) due to the need for access should the site progress.

- We are also concerned about the requirement for any instant screening of the site due to the fact that it is overlooked and privacy needs to be preserved for existing residents. The screening would have to be very high fencing, as neither a natural stone wall nor hedging (which would be considered more traditional in character) would be possible as far as we can see. We feel that high fencing or screening would not be appropriate in a conservation area as it would be out of character.

3. Privacy and Amenity for Residents

- The site will have a detrimental impact on the amenity value of ourselves and our neighbours/residents regardless of how well the site is landscaped or screened

- Since the Canteen site is so narrow and there is the requirement to provide access to the site, it is difficult to see how adequate screening or 'sympathetic landscaping' could be provided at the front of the site. It would be impossible to screen the site from the south side adjacent No19 Bath Old Road without having a serious impact on residents view or being so high as to block light from their property.
- Further screening will need to be provided on the north side of the proposed site should that become available for residential development in the future. A previous planning application (2007) to build 14 homes on the site was indeed refused, partially due to the site overlooking adjacent properties.

In Policy CPII of the Draft Core Strategy which sets out the requirements for assessing site suitability, B&NES states:

"Use of the site must have no harmful impact on the amenities of neighbouring occupiers."

It is our opinion that the site will have a detrimental impact on residents' amenity value regardless of how well the site is landscaped or screened.

4. Access

- Bath Old Road does not support access to the old Canteen site for gypsies/travellers
- Bath Old Road already has a serious parking problem with cars parking on both sides of the road resulting in a single track road for long stretches (particularly evident at weekends). This often means several cars trying to pull into any free parking space to allow other cars to pass or cars reversing up or down the road. It is also heavily congested especially during the morning and evening rush hours due to the road being used as a "rat run" for traffic not wishing to queue on the main road into Radstock. Residents pulling out from existing driveways between parked cars, such as ourselves, often have no visibility and have to nudge forward and take a "pot luck" approach to get out onto Bath Old Road. We have had and continue to have many near misses especially as traffic speeds significantly over the 30 mile per hour limit, with the authorities being very reluctant to address the problem.
- Since the school closed, times have moved on with more residents owning more vehicles and therefore needing more space for parking. There would undoubtedly be restricted visibility for anyone attempting to pull out from the proposed site onto the main road.
- It is perhaps doubtful that a caravan or trailer would be able to manoeuvre into any entrance made for the site as normal sized cars pulling in out of the driveways are often millimetres away from parked vehicles when pulling in and onto the road.
- Remedial work to make the access into the site safe would undoubtedly put extra pressure on the existing residents' parking, and exacerbate the current problems.
- Policy CPII of The Draft Core Strategy requires when assessing the suitability of travellers sites that:
"satisfactory means of access can be provided and the existing highway network is adequate to service the site."

There is no satisfactory access for the site on Bath Old Road, and any remedial activity will have a detrimental impact on the rest of Bath Old Road.

- Indeed Appendix E of the B&NES Detailed Site Assessment Report for Bath Old Road states:

" Off street parking would be an important part of site design as parking is constrained in this area."

and that

"Access on the site may require works to make safe to take account of the need for visibility."

B&NES evidently already recognises that there are significant issues regarding site access and highways, and this alone, notwithstanding all of the other factors, should result in this site being taken off the list of considered sites.

5. Cost to Tax Payers and value for money

- The cost to the tax payer to transition the site in Bath Old Road to accommodate two traveller pitches is completely disproportionate. What are the costs of putting in place the proposed site for two pitches, and who is expected to pay for it?

- B&NES have not explained the estimated cost of the site, and who will be paying for the work required to make the site habitable. Such costs will include (but not limited to) road amendments, demolition of current site, landscaping, purchasing and transportation and positioning the caravans, connecting services: water, sewerage, electricity. How will the caravans be cleaned, and items such as mattresses and soft furnishings replaced or cleaned every 6 months between one set of travellers leaving and the next arriving.
- There has been no explanation as to the cost is for the removal of the current buildings, safety work, roadwork costs or the costs to enable children to be accommodated in local schools.
- The cost would likely be extremely disproportionate to the size of the site and the objectives of B&NES

Summary

In summary, it appears that even if it is established that B&NES owns the land at Bath Old Road, there are many and varied reasons why static caravans for a gypsy I travellers site on the Canteen site are not appropriate in accord with B&NES own planning documents.

The costs required to transition the site to accommodate travellers/gypsies is massively disproportionate to the issue that B&NES are seeking to resolve.

It is our belief that this site should be deemed unsuitable for the above purpose and should be immediately withdrawn as a proposed site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3106 / 1 Name: J.M. and L.C. Tudor Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We acknowledge that Bath and North East Somerset Council ('B&NES') is considering the former Radstock Infant School Canteen site in Bath Old Road as a possible location for 2 permanent pitches for static caravans for use by gypsies and travellers.

We fundamentally object to this proposal on the basis of the following arguments which are many and varied:

1. Ownership

- B&NES has not provided proof that it owns the land of the former School Canteen and is therefore not in a position to propose it as a potential site for gypsies and travellers.
 - o We understand the land does not actually belong to B&NES but is in fact part of the Waldegrave Estate. It appears the land was 'gifted' to the county by the Earl Waldegrave in 1903 for the education of the poor under the School Sites Act 1841. The Waldegrave Estate most likely has 'rights of reversion' as has been proved in other instances (i.e. B&NES should have given it back to the Estate) when it stopped being a school.
 - o It is essential that the true ownership of the land is established before development of any kind is considered. Has B&NES

firm and conclusive evidence that it owns the land and if so in what form?

2. Conservation

- B&NES Council itself states that gypsy/traveller sites should not be located within 1.5km of a Conservation Area. Never mind being within 1.5km, Radstock is a designated conservation area.
- According to B&NES document "Living in a Conservation Area", Bath and NE Somerset Council states "It is important that local people become involved in the care of conservation areas through residents' associations amenity groups and local history groups to ensure standards are maintained." With the above "partnership" in mind, as local residents and supporters of the local residents' group BORAG we would like all the following points regarding our conservation area to be noted ensuring, that "Standards are maintained".

- Static caravans (plus potentially any screening around them) will not meet any of the criteria contained in the "Living in a Conservation Area" document.. .. and as such the entire document could be quoted with regard to why the siting of static caravans in Bath Old Road would not be acceptable. Perhaps the most pertinent references from our perspective being:

- "Conservation areas give broader protection other than listing individual buildings, all the features within a conservation area, listed or otherwise, are recognised as part of its character, as are the range of uses to which land and buildings are put" The use of land as a site for static caravans will not be in character with the surrounding limestone miner's cottages built in the 19th Century, which lie adjacent to the site on both sides and opposite.

- "There are many instances when a seemingly small alteration can damage the historic character and appearance of an area" Examples include:

"replacing original timber doors with "off the shelf" plastic or tropical hardwood doors"

Once again, static caravans are usually constructed of metal or plastic and will therefore be grossly out of place in the conservation area -and will be an "enormous alteration" as oppose to a "seemingly small alteration" which would indeed "damage the historic character and appearance" of the area. The document also states:

- "Replacing boundary walls, railings and hedges with materials not traditional in character" "Consent is sometimes required for the demolition of garden walls, especially those facing a highway ... "

The above quotes seem appropriate for the boundary wall which would need to be demolished altogether to gain access to the Canteen site. This would be taking away a very old stone wall that used to enclose the 'Board School' garden which was on this site before the canteen was built. The said boundary wall could not be replaced (even with materials in character with the conservation area) due to the need for access should the site progress. • We are also concerned about the requirement for any instant screening of the site due to the fact that it is overlooked and privacy needs to be preserved for existing residents. The screening would have to be very high fencing, as neither a natural stone wall nor hedging (which would be considered more traditional in character) would be possible as far as we can see. We feel that high fencing or screening would not be appropriate in a conservation area as it would be out of character.

3. Privacy and Amenity for Residents

- The site will have a detrimental impact on the amenity value of ourselves and our neighbours/residents regardless of how well the site is landscaped or screened

- Since the Canteen site is so narrow and there is the requirement to provide access to the site, it is difficult to see how adequate screening or 'sympathetic landscaping' could be provided at the front of the site. It would be impossible to screen the site from the south side adjacent No19 Bath Old Road without having a serious impact on residents view or being so high as to block light from their property.

- Further screening will need to be provided on the north side of the proposed site should that become available for residential development in the future. A previous planning application (2007) to build 14 homes on the site was indeed refused, partially due to the site overlooking adjacent properties. In Policy CP11 of the Draft Core Strategy which sets out the requirements for

assessing site suitability, B&NES states:

"Use of the site must have no harmful impact on the amenities of neighbouring occupiers."

It is our opinion that the site will have a detrimental impact on residents' amenity value regardless of how well the site is landscaped or screened.

4. Access

- Bath Old Road does not support access to the old Canteen site for gypsies/travellers

- Bath Old Road already has a serious parking problem with cars parking on both sides of the road resulting in a single track

road for long stretches (particularly evident at weekends). This often means several cars trying to pull into any free parking space to allow other cars to pass or cars reversing up or down the road. It is also heavily congested especially during the morning and evening rush hours due to the road being used as a "rat run" for traffic not wishing to queue on the main road into Radstock. Residents pulling out from existing driveways between parked cars, such as ourselves, often have no visibility and have to nudge forward and take a "pot luck" approach to get out onto Bath Old Road. We have had and continue to have many near misses especially as traffic speeds significantly over the 30 mile per hour limit, with the authorities being very reluctant to address the problem.

- Since the school closed, times have moved on with more residents owning more vehicles and therefore needing more space for parking. There would undoubtedly be restricted visibility for anyone attempting to pull out from the proposed site onto the main road.
- It is perhaps doubtful that a caravan or trailer would be able to manoeuvre into any entrance made for the site as normal sized cars pulling in out of the driveways are often millimetres away from parked vehicles when pulling in and onto the road.
- Remedial work to make the access into the site safe would undoubtedly put extra pressure on the existing residents' parking, and exacerbate the current problems.
- Policy CPII of The Draft Core Strategy requires when assessing the suitability of travellers sites that: "satisfactory means of access can be provided and the existing highway network is adequate to service the site." There is no satisfactory access for the site on Bath Old Road, and any remedial activity will have a detrimental impact on the rest of Bath Old Road.
- Indeed Appendix E of the B&NES Detailed Site Assessment Report for Bath Old Road states: "Off street parking would be an important part of site design as parking is constrained in this area." and that "Access on the site may require works to make safe to take account of the need for visibility." B&NES evidently already recognises that there are significant issues regarding site access and highways, and this alone, notwithstanding all of the other factors, should result in this site being taken off the list of considered sites.

5. Cost to Tax Payers and value for money

- The cost to the tax payer to transition the site in Bath Old Road to accommodate two traveller pitches is completely disproportionate. What are the costs of putting in place the proposed site for two pitches, and who is expected to pay for it?
- B&NES have not explained the estimated cost of the site, and who will be paying for the work required to make the site habitable. Such costs will include (but not limited to) road amendments, demolition of current site, landscaping, purchasing and transportation and positioning the caravans, connecting services: water, sewerage, electricity. How will the caravans be cleaned, and items such as mattresses and soft furnishings replaced or cleaned every 6 months between one set of travellers leaving and the next arriving.
- There has been no explanation as to the cost is for the removal of the current buildings, safety work, roadwork costs or the costs to enable children to be accommodated in local schools.
- The cost would likely be extremely disproportionate to the size of the site and the objectives of B&NES

Summary

In summary, it appears that even if it is established that B&NES owns the land at Bath Old Road, there are many and varied reasons why static caravans for a gypsy I travellers site on the Canteen site are not appropriate in accord with B&NES own planning documents. The costs required to transition the site to accommodate travellers/gypsies is massively disproportionate to the issue that B&NES are seeking to resolve. It is our belief that this site should be deemed unsuitable for the above purpose and should be immediately withdrawn as a proposed site.

Respondent: 3106 / 1 Name: J.M. and L.C. Tudor Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Objection to Proposed Gypsy / Travellers Site at Bath Old Road, Radstock Background and Purpose We acknowledge that Bath and North East Somerset Council ('B&NES') is considering the former Radstock Infant School Canteen site in Bath Old Road as a possible location for 2 permanent pitches for static caravans for use by gypsies and travellers.

We fundamentally object to this proposal on the basis of the following arguments which are many and varied:

Arguments

1. Ownership

* B&NES has not provided proof that it owns the land of the former School Canteen and is therefore not in a position to propose it as a potential site for gypsies and travellers.

o We understand the land does not actually belong to B&NES but is in fact part of the Waldegrave Estate. It appears the land was 'gifted' to the county by the Earl Waldegrave in 1903 for the education of the poor under the School Sites Act 1841. The Waldegrave Estate most likely has 'rights of reversion' as has been proved in other instances (i.e. B&NES should have given it back to the Estate) when it stopped being a school.

o It is essential that the true ownership of the land is established before development of any kind is considered. Has B&NES firm and conclusive evidence that it owns the land and if so in what form?

2. Conservation

* B&NES Council itself states that gypsy/traveller sites should not be located within 1.5km of a Conservation Area.

Never mind being within 1.5km, Radstock is a designated conservation area.

* According to B&NES document "Living in a Conservation Area", Bath and NE Somerset Council states "It is important that local people become involved in the care of conservation areas through residents' associations amenity groups and local history groups to ensure standards are maintained."

With the above "partnership" in mind, as local residents and supporters of the local residents' group BORAG we would like all the following points regarding our conservation area to be noted ensuring, that "standards are maintained".

* Static caravans (plus potentially any screening around them) will not meet any of the criteria contained in the "Living in a Conservation Area" document....and as such the entire document could be quoted with regard to why the siting of static caravans in Bath Old Road would not be acceptable.

Perhaps the most pertinent references from our perspective being:

* "Conservation areas give broader protection other than listing individual buildings, all the features within a conservation area, listed or otherwise, are recognised as part of its character, as are the range of uses to which land and buildings are put"

The use of land as a site for static caravans will not be in character with the surrounding limestone miner's cottages built in the 19th Century, which lie adjacent to the site on both sides and opposite.

* "There are many instances when a seemingly small alteration can damage the historic character and appearance of an area"

Examples include:

"replacing original timber doors with "off the shelf" plastic or tropical hardwood doors"

Once again, static caravans are usually constructed of metal or plastic and will therefore be grossly out of place in the conservation area -and will be an "enormous alteration" as oppose to a "seemingly small alteration" which would indeed "damage the historic character and appearance" of the area.

The document also states:

* "Replacing boundary walls, railings and hedges with materials not traditional in character"

"Consent is sometimes required for the demolition of garden walls, especially those facing a highway..."

The above quotes seem appropriate for the boundary wall which would need to be demolished altogether to gain access to the Canteen site. This would be taking away a very old stone wall that used to enclose the 'Board School' garden which was on this site before the canteen was built.

The said boundary wall could not be replaced (even with materials in character with the conservation area) due to the need for access should the site progress.

* We are also concerned about the requirement for any instant screening of the site due to the fact that it is overlooked and privacy needs to be preserved for existing residents. The screening would have to be very high fencing, as neither a natural stone wall nor hedging (which would be considered more traditional in character) would be possible as far as we can see. We feel that high fencing or screening would not be appropriate in a conservation area as it would be out of character.

3. Privacy and Amenity for Residents

- * The site will have a detrimental impact on the amenity value of ourselves and our neighbours/residents regardless of how well the site is landscaped or screened
- * Since the Canteen site is so narrow and there is the requirement to provide access to the site, it is difficult to see how adequate screening or 'sympathetic landscaping' could be provided at the front of the site. It would be impossible to screen the site from the south side adjacent No19 Bath Old Road without having a serious impact on residents view or being so high as to block light from their property.
- * Further screening will need to be provided on the north side of the proposed site should that become available for residential development in the future. A previous planning application (2007) to build 14 homes on the site was indeed refused, partially due to the site overlooking adjacent properties.

In Policy CP11 of the Draft Core Strategy which sets out the requirements for assessing site suitability, B&NES states: "Use of the site must have no harmful impact on the amenities of neighbouring occupiers."

It is our opinion that the site will have a detrimental impact on residents' amenity value regardless of how well the site is landscaped or screened.

4. Access

- * Bath Old Road does not support access to the old Canteen site for gypsies/travellers
- * Bath Old Road already has a serious parking problem with cars parking on both sides of the road resulting in a single track road for long stretches (particularly evident at weekends). This often means several cars trying to pull into any free parking space to allow other cars to pass or cars reversing up or down the road. It is also heavily congested especially during the morning and evening rush hours due to the road being used as a "rat run" for traffic not wishing to queue on the main road into Radstock. Residents pulling out from existing driveways between parked cars, such as ourselves, often have no visibility and have to nudge forward and take a "pot luck" approach to get out onto Bath Old Road. We have had and continue to have many near misses especially as traffic speeds significantly over the 30 mile per hour limit, with the authorities being very reluctant to address the problem.
- * Since the school closed, times have moved on with more residents owning more vehicles and therefore needing more space for parking. There would undoubtedly be restricted visibility for anyone attempting to pull out from the proposed site onto the main road.
- * It is perhaps doubtful that a caravan or trailer would be able to manoeuvre into any entrance made for the site as normal sized cars pulling in out of the driveways are often millimetres away from parked vehicles when pulling in and onto the road.
- * Remedial work to make the access into the site safe would undoubtedly put extra pressure on the existing residents' parking, and exacerbate the current problems.
- * Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that: "satisfactory means of access can be provided and the existing highway network is adequate to service the site." There is no satisfactory access for the site on Bath Old Road, and any remedial activity will have a detrimental impact on the rest of Bath Old Road.
- * Indeed Appendix E of the B&NES Detailed Site Assessment Report for Bath Old Road states: "Off street parking would be an important part of site design as parking is constrained in this area." and that "Access on the site may require works to make safe to take account of the need for visibility."

B&NES evidently already recognises that there are significant issues regarding site access and highways, and this alone, notwithstanding all of the other factors, should result in this site being taken off the list of considered sites.

5. Cost to Tax Payers and value for money

- * The cost to the tax payer to transition the site in Bath Old Road to accommodate two traveller pitches is completely disproportionate. What are the costs of putting in place the proposed site for two pitches, and who is expected to pay for it?
- * B&NES have not explained the estimated cost of the site, and who will be paying for the work required to make the site habitable. Such costs will include (but not limited to) road amendments, demolition of current site, landscaping, purchasing and transportation and positioning the caravans, connecting services: water, sewerage, electricity. How will the caravans be cleaned, and items such as mattresses and soft furnishings replaced or cleaned every 6 months between

one set of travellers leaving and the next arriving.

* There has been no explanation as to the cost is for the removal of the current buildings, safety work, roadwork costs or the costs to enable children to be accommodated in local schools.

* The cost would likely be extremely disproportionate to the size of the site and the objectives of B&NES

Summary

In summary, it appears that even if it is established that B&NES owns the land at Bath Old Road, there are many and varied reasons why static caravans for a gypsy / travellers site on the Canteen site are not appropriate in accord with B&NES own planning documents.

The costs required to transition the site to accommodate travellers/gypsies is massively disproportionate to the issue that B&NES are seeking to resolve.

It is our belief that this site should be deemed unsuitable for the above purpose and should be immediately withdrawn as a proposed site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3106 / 2 Name: J.M. and L.C. Tudor Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The Bath Old Road site is not suitable for a gypsy site, and there are three specific pieces of information which should be considered;

- The proper consultation process has not been followed by B&NES

The Preferred Options Paper and process utilised by B&NES draws on guidance from the out-dated Circulars 2006 and 2007 and dated planning documents. As a result the consultation methods do not comply with the new policy guidance which requires early local community engagement and a full and proper needs assessment

The site selection matrix utilised is embarrassingly imbalanced and amateur. Any reasonable person would expect a matrix of this nature to include an evaluation of the impact on the amenity value of residents, amount of disruption to the settled residents, its compliance with local planning rules, cost/benefit analysis, and road safety analysis.

In addition the analysis should further have considered alternate uses for the sites for the benefit of the wider community more aligned to the original purpose of the site.

- There is current gypsy site at Twerton that could easily be expanded and is an ideal location

The suitability of the Twerton site is ideal, selected by the gypsy representatives themselves, having plenty of space to be screened from the road, and it does not dominate the local community nor negatively impact residential properties or the prospects of the community

- Ownership of Location

B&NES has not provided proof that it owns the land of the former School Canteen and is therefore not in a position to propose it as a potential site for gypsies and travellers.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the Council's assessment.

The Bath Old Road location is not suitable for a gypsy/travellers site. The proper consultation process has not been followed by B&NES, the proposed site is contra to B&NES own planning recommendations, the site cannot be delivered from a road safety perspective, the proposal is not cost effective, and in addition it would materially impact both the amenity and financial value of my property.

- B&NES have not followed current guidance found in the Policy Impact Assessment Paper (see previous section).
- The proposed site lies within a conservation area, in direct conflict with B&NES own planning guidelines. B&NES Council itself states that gypsy/traveller sites should not be located within 1.5km of a Conservation Area. The proposed site lies directly within a Conservation area, surely B&NES should follow its own planning regulations?
- The proposed site lies in a built up residential area where traffic volumes already lead to significant parking and access problems. Access to the site would be a major issue. Bath Old Road already has a serious parking problem with cars parking on both sides of the road resulting in a single track road for long stretches (particularly evident evenings and weekends). This often means several cars trying to pull into any free parking space to allow other cars to pass or cars reversing up or down the road. It is also heavily congested especially during the morning and evening rush hours due to the road being used as a "rat run" for traffic not wishing to queue on the main road into Radstock. Residents pulling out from existing driveways between parked cars, such as ourselves, often have no visibility and have to nudge forward and take a "pot luck" approach to get out onto Bath Old Road. We have had and continue to have many near misses especially as traffic speeds significantly over the 30 mile per hour limit, with the authorities being very reluctant to address the problem. Remedial work to make the access into the site safe would undoubtedly put extra pressure on the existing residents' parking, and exacerbate the current problems.
- Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that: "satisfactory means of access can be provided and the existing highway network is adequate to service the site." There is no satisfactory access for the site on Bath Old Road, and any remedial activity will have a detrimental impact on the rest of Bath Old Road.
- The cost to the tax payer to transition the site in Bath Old Road to accommodate two traveller pitches is completely disproportionate to the issue that B&NES are seeking to resolve.
- The site will have a detrimental impact on the amenity value of my family, and myself, and our neighbours/residents regardless of how well the site is landscaped or screened. Policy CP11 of the Draft Core Strategy, which sets out the requirements for assessing site suitability, B&NES states: "Use of the site must have no harmful impact on the amenities of neighbouring occupiers."

B&NES evidently already recognises that there are significant issues regarding site access and highways, and this alone, notwithstanding all of the other factors, should result in this site being taken off the list of considered sites.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I absolutely disagree for all of the reasons outlined in this response document.

The Bath Old Road site lies firmly within a Conservation Area, it is in a built up area of settled residential properties, which would (even with 'sympathetic' screening) not be suitable for a gypsy site.

The proposed site if developed would prove to be significantly detrimental to the financial value of the current residents properties and significantly reduce the amenity value of our property.

Site selection has not been undertaken in line with current Planning Policy guidelines and the Preferred Options have not been identified on a logical or reasonable basis.

The site is not suitable from a planning perspective given the road infrastructure and built up access.

Do you have any other general comments on the Preferred Options paper?

The Preferred Options Paper and process utilised by B&NES draws on guidance from the out-dated Circulars 2006 and 2007 and dated planning documents. As a result the consultation methods did not comply with the new policy guidance which requires early local community engagement and a full and proper needs assessment

The site selection matrix utilised is embarrassingly imbalanced and amateur. Any reasonable person would expect a matrix of this nature to include an evaluation of the impact on the amenity value of residents, amount of disruption to the settled residents, its compliance with local planning rules, cost/benefit analysis, and road safety analysis.

The analysis should further have considered alternate uses for the sites for the benefit of the wider community more aligned to the original purpose of the site

Respondent: 3224 / 1 Name: S Reynolds Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Definitely not

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely not

Do you have any other general comments on the Preferred Options paper?

The area is a 'conservation area'. There are major constraints in the area on parking for residents. Access to the site is unsustainable. The value of property will decline considerably. There are pockets of deprivation all over the Norton-Radstock area. To create another 'indicator' of poverty is ludicrous especially in a village that is supposed to be regenerated. Current proposals are not in line with governments NPP framework. Why would gypsies/travellers want to be plonked in the middle of suburbia?

Respondent: 3230 / 1 Name: Mr Williams Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with the constraint on parking.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

There is no room to manoeuvre the caravans. The road is too narrow. Screening would be needed for travellers and residents.

Respondent: 3231 / 1 Name: Mr Hill Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. As this would go against council's own planning policies.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely not! Visibility would be a major problem. Dangerous for children and residents. Manoeuvring a caravan onto site would be extremely difficult blocking road.

Do you have any other general comments on the Preferred Options paper?

Site is in a conservation area and therefore should not be within 1.5 km. Access and traffic would become difficult and increased. Traffic is very difficult at present.

Respondent: 3232 / 1 Name: Mark Farmer Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes GT4 in Radstock

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Yes

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Yes

Do you have any other general comments on the Preferred Options paper?

Respondent: 3234 / 1 Name: Mrs E M Davis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

1. The site is very narrow and visibility on and off the site is nil, traffic coming up and down the road have a single track, as the parking of vehicles both sides restricts view from both ends.

2. As I understand from one of your colleagues during the consultation Process, a proper detailed visit and report from the Highways dept has not been done. It has been decided to wait until the consultation process is finished and then to ask for a further more in depth decision. This seems to be prosperous, to waste time and money, when it is patently obvious that this should have not been suggested as a possible site in the first place.. I ask' have all the cabinet been to the site and checked it out before they make their decision'.

3. Bath Old Road is a residential road, its residents having to park both sides of The road as they are terraced properties and do not have garages and parking Spaces. In some cases there are three or more cars to a property, some residents use work vehicles and must park outside their houses. 99% of the time morning and evening there are 80+ cars and vehicles parked in this road from top to the bottom. There have been numerous accidents involving walls being knocked down, car

mirrors knocked off, dents and cars being written off .. At some stage there will be a fatality, I have been squashed against my car as I have tried to get out of it. This road is a rat run for cars trying to beat the traffic in the New Bath Road, Banes have been notified of the problem, the Police have been advised and no one takes any notice. If this site goes ahead the place will be a death trap for both motorists and pedestrians alike.

4. Radstock is a conversation area and this proposal contravenes planning issues in the area.

These issues are the most important areas and should be acted upon, the travellers site should be rejected totally upon the grounds above for health and safety reasons. I would ask that you reject this proposal for the Old School Canteen at Bath Old Road Radstock

Respondent: 3234 / 1 Name: Mrs E M Davis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

This area is a conservation area. The Radstock canteen, Bath Old Road is within yards of quiet residential homes. Access to the site is difficult.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. I do not.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I strongly oppose the provision of 2 sites on this ground. I have already signed the e-petition against this. It is not an appropriate site because access off a busy road already cluttered with parking. Visibility is nil and homes within yards of the site.

Do you have any other general comments on the Preferred Options paper?

Radstock is a conservation area, the area around the site is full of cars (parking for residents who have no garages) Access to the site is blind, and most of the day this road is used as a rat run to beat traffic on the new Bath Road. Several quite serious accidents have occurred and more traffic will only make matters worse. This site is definitely not right for the proposed gypsy/traveller site and I strongly oppose this on planning grounds and the above reasons.

Respondent: 3234 / 1 Name: Mrs E M Davis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I would like to register my strong opposition to the above site on the following grounds:-
 1.The site is very narrow and visibility on and off the site is nil, traffic coming up and down the road have a single track, as the parking of vehicles both sides restricts view from both ends.
 2. As I understand from one of your colleagues during the consultation Process, a proper detailed visit and report from the Highways dept has not been done. It has been decided to wait until the consultation process is finished and then to ask for a further more in depth decision. This seems to be prosperous, to waste time and money, when it is patently obvious that this should have not been suggested as a possible site in the first place.. I ask' have all the cabinet been to the site and

checked it out before they make their decision'.

3. Bath Old Road is a residential road, its residents having to park both sides of The road as they are terraced properties and do not have garages and parking Spaces. In some cases there are three or more cars to a property, some residents use work vehicles and must park outside their houses. 99% of the time morning and evening there are 80+ cars and vehicles parked in this road from top to the bottom. There have been numerous accidents involving walls being knocked down, car mirrors knocked off, dents and cars being written off.. At some stage there will be a fatality, I have been squashed against my car as I have tried to get out of it. This road is a rat run for cars trying to beat the traffic in the New Bath Road, Banes have been notified of the problem, the Police have been advised and no one takes any notice. If this site goes ahead the place will be a death trap for both motorists and pedestrians alike.

4. Radstock is a conversation area and this proposal contravenes planning issues in the area.

These issues are the most important areas and should be acted upon, the travellers site should be rejected totally upon the grounds above for health and safety reasons. I would ask that you reject this proposal for the Old School Canteen at Bath Old Road Radstock

Respondent: 3235 / 1 Name: Mr Graham Woodland Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. More traffic movement of trailers and lorries associated with travellers. This site is wholly inappropriate in that it is already in a very congested road. The road is used as a rat run for traffic coming from Bath, and the whole road is virtually single lane because of parking.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Absolutely not!

Do you have any other general comments on the Preferred Options paper?

Respondent: 3237 / 1 Name: Joan Harding Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site at Bath Old Road is not suitable as a travellers site - it is far too small and too near other housing and the road far too congested with parked cars etc.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. I don't agree. The road is far too busy already with traffic using it as a 'rat run' to and from Bath. Any houses built should have provision for parking and any dwelling should be in keeping with the other properties.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree. It does not follow planning guidelines and is quite unsuitable.

Do you have any other general comments on the Preferred Options paper?

The land should be used for housing of local residents. To put a travellers site on a small part of this land would jeopardise this and would no doubt be taken over by the travellers which would surely be illegal.

Respondent: 3238 / 1 Name: Mr R F Gullick Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site selected at Bath old road is not suitable or achievable to be short listed. It is too small for the amount of vans you wish to put there.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I disagree there will not be enough screening around it to meet the need of local residents and the gypsies themselves. The access is not good. Too many cars parked there.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, not enough room for the amount of caravans.

Do you have any other general comments on the Preferred Options paper?

Could be a nursery or something else for the community.

Respondent: 3258 / 1 Name: A T Abery Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

According to the local M.P., Mr. Jacob Rees-Mogg, the instructions to the local council from central government on proposed Gypsy | Traveller sites are two fold:

- 1) To avoid the use of greenbelt or conservation areas.
- 2) Informed local consent needs to be secured. This being emphasized in the guide lines that the welfare of the local residence be given equal importance in balance with the need to find a travellers site.

What research was carried out with the local residence in Bath Old Rd and Radstock prior to it being decided that the site at the old infant school was suitable?

What were the results of this research work?

As the proposed site at the old infant school was gifted in 1903 for the "education of the poor in the area of Radstock"; what proof does the council have that it can depose of the site other than for educational purposes? It should be used as a help to Trinity Infant School as they are using temporary buildings as classrooms due to the over subscription of children.

Bath Old Rd., over the years has been the scene of many car accidents. The residence of this road has asked the council for traffic calming systems and lower speed restrictions.

These have been declined for reasons of access by the emergency services. What consultations have taken place with the emergency services to the proposed Gypsy | Traveller site? What were their responses?

I would be grateful to hear your replies to these enquires as soon as possible.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3258 / 1 Name: A T Aberly Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

According to the local M.P., Mr. Jacob Rees-Mogg, the instructions to the local council from central government on proposed Gypsy I Traveler sites are two fold:

- 1) To avoid the use of greenbelt or conservation areas.
- 2) Informed local consent needs to be secured. This being emphasized in the guidelines that the welfare of the local residence be given equal importance in balance with the need to find a travelers site.

What research was carried out with the local residence in Bath Old Rd and Radstock prior to it being decided that the site at the old infant school was suitable? What were the results of this research work?

As the proposed site at the old infant school was gifted in 1903 for the "education of the poor in the area of Radstock"; what proof does the council have that it can depose of the site other than for educational purposes? It should be used as a help to Trinity Infant School as they are using temporary buildings as classrooms due to the over subscription of children.

Bath Old Rd., over the years has been the scene of many car accidents. The residence of this road has asked the council for traffic calming systems and lower speed restrictions. These have been declined for reasons of access by the emergency services. What consultations have taken place with the emergency services to the proposed Gypsy Traveler site? What were their responses?

Respondent: 3260 / 1 Name: Mr Anthony Young Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I am concerned as to how BANES has even considered this site as a suitable venue for this purpose for the following reasons. Access can be only described as diabolical as there is not enough off street parking for residents now having to park nose to tail both sides of the road which leaves just a single track road to accommodate though traffic, yes through traffic as BATH OLD ROAD IS A MAJOR RAT RUN FOR TRAFFIC TRYING TO ESCAPE THE RADSTOCK CONGESTION TRAVELLING TO AND FROM BATH USING THE A367. Added to this the proposed site is situated slap bang in the middle of a

residential area, The nearest residents boundary being just two meters away from the proposed site! The width of the site is also questionable bearing in mind caravan/vehicle movements and the erection of service buildings, equipment and vehicle storage, to add to this the area has been deemed by BANES own policy to be a CONSERVATION AREA, Do you really think this proposal will enhance a Conservation Area as any new development is supposed to do, I can imagine what the planners would say if I put a planning application in for two park homes on this site! An earlier planning application to build houses on the whole school site was turned down by the planning department due to not conforming fully to conservation regulations! There is also some doubt as to the legal ownership of the whole site as a Deed of Exchange was made for the whole site between Earl Waldegrave and John Canvin Gregory Chairman of Radstock Urban District Council solely for the education of children in 1903; this included the Canteen area (the proposed site) which was originally the Board School Garden. The Earl has recently successfully claimed back the old St Nicholas School site which also had the same covenant on it.

Respondent: 3260 / 1 Name: Mr Anthony Young Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

With reference to the proposed traveller's site on the old School Canteen site at Bath Old Road Radstock, I am concerned as to how BANES has even considered this site as a suitable venue for this purpose for the following reasons. Access can be only described as diabolical as there is not enough off street parking for residents now having to park nose to tail both sides of the road which leaves just a single track road to accommodate though traffic, yes through traffic as BATH OLD ROAD IS A MAJOR RAT RUN FOR TRAFFIC TRYING TO ESCAPE THE RADSTOCK CONGESTION TRAVELLING TO AND FROM BATH USING THE A367. Added to this the proposed site is situated slap bang in the middle of a residential area, The nearest residents boundary being just two meters away from the proposed site! The width of the site is also questionable bearing in mind caravan/vehicle movements and the erection of service buildings, equipment and vehicle storage, to add to this the area has been deemed by BANES own policy to be a CONSERVATION AREA, Do you really think this proposal will enhance a Conservation Area as any new development is supposed to do, I can imagine what the planners would say if I put a planning application in for two park homes on this site! An earlier planning application to build houses on the whole school site was turned down by the planning department due to not conforming fully to conservation regulations! There is also some doubt as to the legal ownership of the whole site as a Deed of Exchange was made for the whole site between Earl Waldegrave and John Canvin Gregory Chairman of Radstock Urban District Council solely for the education of children in 1903; this included the Canteen area (the proposed site) which was originally the Board School Garden. The Earl has recently successfully claimed back the old St Nicholas School site which also had the same covenant on it.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3260 / 1 Name: Mr Anthony Young Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

I disagree with the council's assessment on this site for the following reasons:

The site is situated in a conservation area. BANES own consultation doc on Gypsies, Travellers and Travelling Showpeople Site Allocations Dev Plan Statement of Consultation (Feb 2012) Q.9 4.34 clearly sets out that sites should not be allocated within 1.5km of a conservation area!

The site is also not wide enough to accommodate caravans being manoeuvred by vehicles it would have to accommodate a toilet/washing facility block and area's for parking vehicles/equipment etc. The site is in a residential area with houses. Situated on three sides of the site, the nearest residents boundary is only two meters away from the site. Access is very restricted due to residents having to park both sides of the road (24 hour) leaving just a narrow single lane in the middle of the road which also has to accommodate vast amounts of traffic from the A367 using Bath Old Road as a major rat run.

The suggestion to develop the old school canteen in Bath Old Road ignores the traffic and road safety situation in the area.

Bath Old Road is primarily a residential road containing a number of properties built before the age of the motor car without garages or parking facilities on their property. Consequently, the owners are obliged to park on the carriageway.

The road continues after its junction with Men dip Way as a country lane until it meets the A367. On this stretch it has no footpaths and is not restricted with regards to speed.

Thus, its link with the A367 and Radstock Town Centre is attractive as a 'rat run' to avoid queues in Bath New Road. (This activity is being discouraged albeit unsuccessfully).

The road therefore consists of a fastish country lane inked by a steep slope and a blind bend to an area almost completely full of parked cars on both sides of the road. (This on a 24 –hr basis)

It would appear to me that the best approach from a road safety point of view would be to minimise the number of vehicle movements in the road.

The proposal to introduce a traveller's site would be a direct contradiction of this.

It is likely that travellers would possess at least on vehicle per pitch and that these would be likely to enter and leave frequently during the day- a difficult manoeuvre with the existing parked vehicles.

I maintain that the canteen area of the school as a traveller's site would be disastrous from a road safety aspect.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3260 / 2 Name: Mr Anthony Young Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

With reference to the proposed traveller's site on the old School Canteen site at Bath Old Road Radstock, I am concerned as to how BANES has even considered this site as a suitable venue for this purpose for the following reasons. Access can be

only described as diabolical as there is not enough off street parking for residents now having to park nose to tail both sides of the road which leaves just a single track road to accommodate though traffic, yes through traffic as BATH OLD ROAD IS A MAJOR RAT RUN FOR TRAFFIC TRYING TO ESCAPE THE RADSTOCK CONGESTION TRAVELLING TO AND FROM BATH USING THE A367. Added to this the proposed site is situated slap bang in the middle of a residential area, The nearest residents boundary being just two meters away from the proposed site! The width of the site is also questionable bearing in mind caravan/vehicle movements and the erection of service buildings, equipment and vehicle storage, to add to this the area has been deemed by BANES own policy to be a CONSERVATION AREA, Do you really think this proposal will enhance a Conservation Area as any new development is supposed to do, I can imagine what the planners would say if I put a planning application in for two park homes on this site! An earlier planning application to build houses on the whole school site was turned down by the planning department due to not conforming fully to conservation regulations!

There is also some doubt as to the legal ownership of the whole site as a Deed of Exchange was made for the whole site between Earl Waldegrave and John Canvin Gregory Chairman of Radstock Urban District Council solely for the education of children in 1903; this included the Canteen area (the proposed site) which was originally the Board School Garden. The Earl has recently successfully claimed back the old St Nicholas School site which also had the same covenant on it.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3262 / 1 Name: Mr A Obern Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with the councils detailed site assessment which states " In terms of landscape and character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable".

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

The site is simply too small to provide space for - static caravan/trailer, mobile caravan, car amenity building, parking and manoeuvring (X2). Safe access cannot be provided without loss of parking for residents in an already overcrowded road. It is not in keeping with allowed development in a conservation area.

Respondent: 3262 / 1 Name: Mr A Obern Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

We are writing to you to express our opposition to the proposed Gypsy and Traveller site at Old Bath Road in Radstock. Having attended the BaNES roadshow & researched the information available on BaNES website we find it hard to understand how this site has made the Council's shortlist.

The Core Strategy Policy CP11 includes a number of requirements for assessing site suitability:

b: "satisfactory means of access can be provided & the existing highway network is adequate to service the site". A satisfactory access can only be provided by significantly reducing on street parking for residents in an already heavily congested street. How would vehicles towing caravans & the static trailers get on & off the site? At one end of Old Bath Road there is traffic calming & at the other is a narrow lane- surely not suitable. Has a highways assessment been carried out?

c: "the site is large enough to allow for adequate space for on-site facilities & amenity, parking & manoeuvring, as well as any commercial activity" How can all this be achieved with two pitches on such a small & narrow site?

d: "the site does not harm the character & appearance of the surrounding area" The site is within a Conservation Area, how can this site be sympathetic & enhance the area ? as this is a BaNES requirement for any development in a Conservation Area. Also BaNES recommends there should be no Gypsy, Traveller sites within 1.5 Km of a Conservation area.

f: "use of the site must have no harmful impact on the amenities of neighbouring occupiers" Number 19 Bath Old Road is within two metres of this site, how could this be adequately screened to protect privacy without loss of amenity? The loss of on street parking to create an access is another obvious loss of amenity.

How can the Council set out a criteria for the identification of suitable sites & then seemingly not apply said criteria to the sites? Or if they do apply the criteria, carry on regardless when this site clearly fails on four out of seven requirements ?

On the Detailed site assessment plan GT.4 Former Radstock Infant School it states in terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable". What does UNACCEPTABLE mean to you ?

There is also a question as to who actually owns the land, should it have reverted to Earl Waldegrave's ownership when it ceased being a school ? Is it responsible or sensible for the Council to carry forward this site when such an important issue is unresolved ?

Why did BaNES Cabinet ignore the recommendations of the Planning Scrutiny Panel?

This site would not be welcomed by the local community and would nothing to encourage a harmonious society.

We hope that we can rely on your support in backing your local electorate & look forward to hearing your views & response to the points & questions raised in this letter.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3262 / 1 Name: Mr A Obern Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We find it hard to understand how this site has made the Council's shortlist.

The Core Strategy Policy CP11 includes a number of requirements for assessing site suitability:

b: "satisfactory means of access can be provided & the existing highway network is adequate to service the site".

A satisfactory access can only be provided by significantly reducing on street parking for residents in an already heavily congested street. How would vehicles towing caravans & the static trailers get on & off the site? At one end of Old Bath Road there is traffic calming & at the other is a narrow lane- surely not suitable. Has a highways assessment been carried out?

C: "the site is large enough to allow for adequate space for on-site facilities & amenity, parking & manoeuvring, as well as any commercial activity"

How can all this be achieved with two pitches on such a small & narrow site ?

D: "the site does not harm the character & appearance of the surrounding area"

The site is within a Conservation Area, how can this site be sympathetic & enhance the area? as this is a BaNES requirement for any development in a Conservation Area. Also BaNES recommends there should be no Gypsy, Traveller sites within 1.5 Km of a Conservation area.

F: "use of the site must have no harmful impact on the amenities of neighbouring occupiers"

Number 19 Bath Old Road is within two metres of this site, how could this be adequately screened to protect privacy without loss of amenity? The loss of on street parking to create an access is another obvious loss of amenity.

How can the Council set out a criteria for the identification of suitable sites & then seemingly not apply said criteria to the sites? Or if they do apply the criteria, carry on regardless when this site clearly fails on four out of seven requirements?

On the Detailed site assessment plan GT.4 Former Radstock Infant School it states "In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable". What does UNACCEPTABLE mean to you ?

There is also a question as to who actually owns the land, should it have reverted to Earl Waldegrave's ownership when it ceased being a school ? Is it responsible or sensible for the Council to carry forward this site when such an important issue is unresolved ?

Why did BaNES Cabinet ignore the recommendations of the Planning Scrutiny panel?

This site would not be welcomed by the local community and would nothing to encourage a harmonious society.

Respondent: 3263 / 1 Name: Mr Anthony K Davis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I am writing to you to express my concern over the proposed Gypsy/Travellers site at Bath Old Road, Radstock.

My concern relates to the access of the site. There is not enough room to get caravans onto the site without knocking down historic walls and even if these walls were to be knocked down residents vehicles would have to be removed from the road adjacent to the site entrance and from at least ten yards either side of the entrance to allow for the 'swing' from the rear of the caravans. This would have to be a permanent removal of resident's vehicles as caravans would be arriving or leaving at different times of the day.

The congestion at the moment is bad enough and the consequences of resident's vehicles being pushed further onto and near bends at either end of the road because of the proposed changes would make the road far more dangerous than it is now.

Bath Old Road is a rat run at all times of the day and night. Putting more pressure on a minor road will increase the possibility of traffic incidents and will make it a death trap.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3268 / 1 Name: Theresa Peters Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

As you are a BANES cabinet member I thought I would write to you directly with my views on the proposed site which I live across the road from. My points are as follows • The proposal and Consultation period has been happening for months yet we have not been informed of this except through the local press and on your web site which I do not look at normally. The proposed change of use of the Victoria Hall warranted a letter delivered to every house. Why did this not happen with this proposal?

- The site is in a designated conservation area. It is a narrow strip of land in a community that has been established for 100 + years. This decision will cause disruption and unhappiness as the council has not been honest from the start with the process and identification of sites happening without any discussion with the local communities. You have 'granted' us a consultation period for 8 weeks yet your process and identification of sites have gone on for far longer. Do you understand the impact this is having? BANES need to wake up and realize that the reason there are so few options for sites is that our area is so wealthy in green belt and conservation areas. Why are you planning to go against your own recommendations and place a site in the middle of one of these areas? Stand up and say you can't meet the government targets!

- The access and parking make the site unsuitable. If you view it in the day the road is quiet and clear. Have you bothered to come and look at 'peak times' when it is a rat run, or at weekends when there is inadequate parking for the current community. Your colleagues in transport turn a blind eye to the problems as it relieves the pressure slightly on the lower Bristol Road. When will you take more interest in the infrastructure of Radstock?

- Your Consultation response form is the worst document I have seen for a long time. I work in the NHS. I am use to filling out forms. Your form starts with asking who you are. Does 'home owner' or 'member of the local community' not figure or am I an ' other'. Your questions are numbered as 1, then a and b then question 8. I have searched high and low thinking I must be missing pages, but others assure me I am not. This form does not make sense. It is poorly written, numbered and quite frankly is a poor document to ask the community to complete.

- Since 2005 there has been one planning application on the whole site that was looked at. From my understanding this was turned down as although the properties that would run roadside were in keeping, the additional properties placed by a greedy developer behind these houses were not in keeping and would cause access problems. These sites are certainly not in keeping. In your proposals you say there would be 'sensitive pitch design'. You mention 'existing screening at this site would assist with this'. What screening? This does not make sense. Are you going to surround the site with a 10ft wall to cause isolation and segregation? Talk sense to us!!

I look forward to hearing back from you with answers to my questions. As a resident, home owner, voter, tax payer and member of the community who lives opposite this site I think it is not much to expect a response to my letter. I will complete the consultation document but nearer to the closing date when it may have been adapted to make it more user friendly.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3268 / 1 Name: Theresa Peters Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

The proposal and Consultation period has been happening for months yet we have not been informed of this except through the local press and on your web site which I do not look at normally. The proposed change of use of the Victoria Hall warranted a letter delivered to every house. Why did this not happen with this proposal?

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Respondent: 3278 / 1 Name: Ms Sheila Broun Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Twerton - Lower Bristol Road. The Gypsies chose this site themselves. It is large enough to be screened. There are no residential properties to be impacted. It is an ideal site.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. This is a conservation area and within Bath councils own guidelines you cannot put travellers, gypsies or show people here, or destroy the wall. There are considerable problems of access, visibility and parking. There is a question of who owns the land, the site is surrounded by residential properties and needs substantial screening for privacy of both communities. The site is very narrow for this to be effective.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, the site is too small for the amount of caravans, which I believe will be one static and one travelling, one shed plus amenities building plus parking per pitch. So this will be 2 mobile homes, 2 caravans, 2 sheds, 2 amenity buildings, parking for 4 cars and bikes. All this plus suitable screening and access.

Do you have any other general comments on the Preferred Options paper?

The land should be used for the local community, for a nursery or allotments - there is already a waiting list for allotments at Hayden. Also the siting of Gypsies and Travellers should benefit BOTH communities.

Respondent: 3278 / 1 Name: Ms Sheila Broun Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Safety : traffic & parking problems

There are substantial issues about road safety. It is only the canteen site that is proposed, and this is enclosed by walls which predate the building of the canteen. The front wall is protected, and yet Bath Council plans to over ride its own policy and legislation in order to demolish it for the entrance to the site.

Parking is already an issue, and to turn into the site there would need to be double yellow lines. Visibility would also be an issue, as Bath Old Road is a rat run, and there is only one lane for traffic with cars parked on both sides of the road.

Conservation Area

Radstock became a designated Conservation Area in 1999 to protect the unique heritage of the area, and the North East Somerset Coalfields. B&NES' Planning Department document, 'Living in a Conservation Area' states, 'Conservation Area designation (provides)...the basis for policies designed to preserve or enhance all aspects of the character or appearance of an area that defines its special architectural or historic interest' (emphasis mine).

In Appendix E of the Detailed Site Assessment for Bath Old Road, B&NES states, 'In terms of landscape character mobile homes or caravans in this location would be viewed as alien in this residential location, and that the impact on character would therefore be unacceptable.'

Also in B&NES own consultation document, 'Gypsies, Travellers & Travelling Showpeople Site Allocations Development Plan Document (DPD) Statement of Consultation (Feb. 2012) Q9 4.34, a recommendation it is clearly stated that, 'sites should not be located within 1.5km of a Conservation Area'.

Thus by proposing the Bath Old Road site as a Gypsy and Traveller site, B&NES Council are clearly flouting their own policy and legislation.

Amenity Value

Yet, despite this policy and legislation, in Appendix E of B&NES Council's Detailed Site Assessment Report for Bath Old Road it is stated that, 'the site location within the Radstock Conservation Area and in a residential area makes the need for site screening important in minimising visual intrusion and preserving resident amenity and privacy.'

To date B&NES Council have not carried out any assessment of the impact to amenity value. In Policy CP11 of the Draft Core Strategy which sets out the requirements for assessing site suitability, B&NES Council states, 'use of the site must have no harmful impact on the amenities of neighbouring occupiers'.

Already the publication of B&NES Council's proposal for the Bath Old Road Canteen Site to be developed as a Gypsy & Traveller site has had a harmful impact on lives of neighbouring occupiers. Mr Saxton had got a new job in Kent so that he could support his daughter, who has learning disabilities, in beginning to live in the community. His house sale was weeks away from completion when his buyers pulled out because of news in Bath Chronicle about the proposed Gypsy & Traveller Site on Bath Old Road. Not only was he unable to fully support his daughter at this crucial stage of her life, but he was also plunged into unemployment and subsequent financial difficulties, as he had handed in his notice when he got his new job.

Councillor Eleanor Jackson has reported that yet another family has suddenly found themselves in similar circumstances.

A couple of houses have 'sold' signs on them. However, the buyers of these two houses have not yet received the results of their searches, and I am informed by their estate agent that it was when Mr Saxton's buyers got the result of the searches that they pulled out of the sale. I have asked the same estate agent to value my house as I live directly opposite the proposed site, and was told that the value would drop substantially should the proposed site go ahead.

Clearly the Gypsies and Travellers need permanent sites that suit their needs. The Lower Bristol Road site in Bath, although illegal, is an example of an excellent site, and I hope it will be made legal. Not only have the Gypsies and Travellers chosen this site themselves, but it is in an area of light industry with daytime employment, and with no residential properties close by. This gives privacy, although the site could be better landscaped from the road.

The Lower Bristol Road site is also near a scrapyards. This brings up another harmful impact which may affect residents on Bath Old Road. The mother of one of my adult students is currently living in a cul-de-sac next to a Gypsy family, where the constant delivery of scrap metal and the sorting of it makes a huge noise. This would not be so much of an issue in a site similar to Lower Bristol Road, but in a small, residential area it would have a great impact.

Bath Old Road is mainly made up of first time buyer houses, and whilst some residents stay for many years, many others come and go, as they follow up work prospects, or as children grow and families need more space. It is unreasonable for Bath Council to harmfully impact the prospects and finances of its residents, as well as being against its own policy and legislation.

B&NES residents reasonably expect their Council to consider their welfare as well as the welfare of the Gypsy & Travelling community. Councillor Eleanor Jackson has proposed some alternative sites which would be more suitable, and I hope that B&NES Council will assess these new sites for Gypsy & Traveller needs, and decide against the sale of the School Canteen on Bath Old Road for a permanent Gypsy & Traveller site.

Respondent: 3278 / 2 Name: Ms Sheila Broun Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Safety : traffic & parking problems

There are substantial issues about road safety. It is only the canteen site that is proposed, and this is enclosed by walls which predate the building of the canteen. The front wall is protected, and yet Bath Council plans to over ride its own policy and legislation in order to demolish it for the entrance to the site.

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The Lower Bristol Road site is also near a scrapyard. This brings up another harmful impact which may affect residents on Bath Old Road. The mother of one of my adult students is currently living in a cul-de-sac next to a Gypsy family, where the constant delivery of scrap metal and the sorting of it makes a huge noise. This would not be so much of an issue in a site similar to Lower Bristol Road, but in a small, residential area it would have a great impact.

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B&NES residents reasonably expect their Council to consider their welfare as well as the welfare of the Gypsy & Travelling community. Councillor Eleanor Jackson has proposed some alternative sites which would be more suitable, and I hope that B&NES Council will assess these new sites for Gypsy & Traveller needs, and decide against the sale of the School Canteen on Bath Old Road for a permanent Gypsy & Traveller site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3298 / 1 Name: Ms Claire Metham Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

In 2007 we purchased an area of land known as 'Land between 13 - 15 Bath Old Rd'. We then developed this land by sympathetic restoration reuse of original materials and new materials sourced to sympathetically match the lias stone buildings that are so characteristic of the area. The council were SO concerned by our development that we had to produce physical examples of the materials we were going to use to build and renovate. Most of our build was constructed from an old and unsafe lias stone wall that we sorted by hand to rebuild our home known as THE COACH HOUSE. We have lived in this house for nearly 3 years now and have enjoyed being part of a strong community.

The proposed site you have earmarked as potential for a permanent travellers site is only 3 houses away from our development we can see it clearly from our lounge and bedroom windows (see photos attached)

Why is this even being considered in a conservation area especially with the legislation the council has in place. It seems as though completely different rules apply with regard to conservation areas. If you are resident you stick by the rules you provide materials samples you build sympathetically with respect for the history and character of the community. If you are the council you just ignore the rules and put something like the proposed traveller site right in the conservation area.

Your document says

4.4.4 Enhancement objectives should seek to to conserve built structures and renovate for appropriate uses and should seek to maintain the historical integrity of the area.

1.1.3 The emphasis within conservation areas is on ensuring local character is strengthened, not diminished by change

So why are you even considering putting a travellers site here. Even with the most sympathetic use of materials you would just be screening off development inappropriate to a conservation area. Needless to say that with a very specific range of materials required to meet the demands of the conservation area they are not always easily sourced or cheap. Radstock is an outstanding example of mining heritage and should be treated this way.

My second issue is the traffic situation. Bath Old Road is already used as a short cut / rat run and access to the site would not be easy. I have trouble getting out of my drive most days because of visibility due to parked cars and the speed that cars come down the Bath Old Road. Currently we own a series of old garages and land that has full planning permission to be developed. Because we cannot develop these currently due to rights of way issues we let neighbours park 4 cars. Once we develop this will be 4 more cars needing to park on The Old Bath Rd.

The other issue is that this development will severely affect the price value of our homes. As we are currently in development that affects more than one property for us. This is not speculation as one resident has already lost a sale due to this proposed permanent traveller site.

Finally please take a look at the photographs I have attached. Our house is a coach house style development therefore the accommodation is all on the top floor with garages below. This means we are on a level with the proposed site. This impacts on our property greatly as well as the gardens of those residents between us and the proposed site

We are opposed to this development and during this consultation period strongly wish to state my opposition and the reasons why I oppose this proposal.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3311 / 1 Name: Mrs Catherine Dewar Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site I am referring to is the Bath Old Road proposed site for 2 families. As far as I can work out from the BANES website this area is in the middle of a conservation area. To put travellers on there would involve screening and access issues which would impinge on the nature of the conservation area. BANES guidelines state that no travellers sites should be within 1.5km of a conservation area, this would place it right in the middle of one.

A proposal for a number of houses on this land was turned down on the grounds that it would impinge on the conservation area – a number of trailers and caravans on this site would enhance it?

There was a distinct lack of pre-consultation with local homeowners before this site was elevated to a high place on the list of proposed sites. When the issue over the use of the Victoria Hall in Radstock was raised the council was able to produce a letter to every household. No such thing has been done over the change of use of the school site. Why not?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. This site is right in the middle of a very busy road where parking is already at a premium for the homeowners. Cars are parked on both sides of the road leaving only access for one car at time to pass and on a hill, around a sharp corner, which makes it very difficult to see at the best of times. To gain access for caravans and trailers the road would have to have double yellow lines in certain places and major access work undertaken to allow vehicles in to the site. This would cause traffic chaos and would be a threat to highway safety when residence fight over parking spots
The canteen site itself is very small and it would be difficult for any travellers to use it effectively without spreading out on to the rest of the old school site. Before you realise it they will have taken over the entire area and the majority of the land is not even owned by BANES, its owned by Lord Waldegrave.
The site is too close to other residences and would impinge on the local houses. There is no way it can be screened off adequately or to a standard that would not affect the view or light into local houses.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, its simply not suitable, sensible or workable. The cost of work that would need to be carried out before the site was suitable would be prohibitable.

Do you have any other general comments on the Preferred Options paper?

I understand that issues at stake are that the travellers are entitled to education and healthcare. The nearest school to the site, the Academy of Trinity, is already over subscribed as is the St Nicholas, the other primary school. The local GPs surgery is already swamped and ithe nearest NHS dentist is in Midsomer Norton. How can adding to the amount of people in the area help this at all?

If you feel the land is going to waste then why not put the school site back into use as the local Nursery, currently in temporary buildings at Trinity, or convert it to allotments where the whole community could benefit.

I cannot imagine how any planning committee would grant that this site should go ahead when they would not allow regular houses to built there. At least with houses they could specify the number, type and style. With travellers you would not be able to do this.

Respondent: 3311 / 1 Name: Mrs Catherine Dewar Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

As a resident in the Bath Old Road neighbourhood I would like to put forward my views on the aforementioned proposal.

We were very concerned to hear of a sudden meeting called in the Whisty Community Centre to discuss the proposal to put a Gypsy and Traveller site on the Old Canteen site in Bath Old Road. This was the first we had heard of any proposal and were surprised that such a thing could be proposed without the local residents knowledge. When there were questions over the use of the Victoria Hall in Radstock we all received a letter detailing the proposals - why did we not have the same for the Gypsy sites? Was it because the council were too scared of the public response? Did they think they could just do it quietly and we would all accept it? Why have you not followed the usual democratic process that would be expected in these circumstances?

We know the Bath Old Road area very well and use it daily. It is always extremely busy with cars parked both sides of the road. Allowing access to the old school site will make this worse as the residents and visitors will have to park further up and down the road. With all the parking issues I cannot see how a traveller would be able to pull his caravan or trailer into

the site without causing a lot damage either to his vehicles or the neighbouring ones. How do you propose to overcome this issue?

Why are you not following the government guidelines that lay out Good Practice for Designing Gypsy and Travellers Sites? During my research I found the following government paper <http://www.comunities.gov.uk/documents/housing/pdf/designinggypsiesites.pdf> 'Designing Gypsy Sites which raises a number of issues:

Access for Emergency Vehicles:

Para 4.25 states 'In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles' How do you propose to overcome this problem when there is parking down both sides of the road? It also states 'more than one access route into the site is recommended.' With houses to the side and rear of the site how do you suggest this happens?

Visual and Acoustic Privacy: Para 4.1 'Sites should be developed in accordance with existing planning policies and designations, with particular regard made to: Convenience for residents; Safety for residents; Visual and acoustic privacy - both for people living on the site and those living nearby; Aesthetic compatibility with the local environment; Scope for social integration with the local community.' I understand this means that any proposed site would have to be adequately screened and sectioned off from the surrounding houses. How do you intend to do this?

Privacy for Residents: Para 4.14 'As with housing for the settled community, site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other's living quarters), but without inhibiting the important sense of community'. How do you propose to do that without changing the whole look of the area, or impinging on the existing light and view for the residents who currently live there?

Site Perimeter and Boundaries: Para 4.10 'The site boundary must provide clear demarcation of the perimeter of the site, so as to prevent nuisance for existing residents created by others seeking to move on to the site without permission. Boundaries should take into account adjoining land uses, and be designed with the safety and protection of children in mind' The canteen site itself is very small and it would be difficult for any travellers to use it effectively without spreading out on to the rest of the old school site. How do you propose to prevent this?

Safe environment for residents: Para 3.3 'It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children'. Are disused school buildings, which may contain asbestos in the roof not construed as hazardous? It would be extremely tempting for children to explore. Especially if they have easy access to it. What would be done to prevent this?

Space, Density and Spacing for Caravans: Para 7.12 'It is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc), parking space for two vehicles and a small garden area. Para 4.17 In designing the layout of a site enough space must be provided to permit the easy maneuverability of resident's own living accommodation both to the site and subsequently on to a pitch. Account needs to be taken of a more recent tendency for members of the Gypsy and Traveller communities to favour the use of a mobile home in place of the traditional caravan, and some mobile homes could be up to around 25 metres in length. Para 4.13 Measures to protect the safety of site residents from fire are of paramount importance, and it is essential that a clear gap of 3 metres is provided within the inside of all site perimeter boundaries as a fire prevention measure. Para 7.8 small pitches may become quickly overcrowded. Larger than average family sizes, alongside the need for vehicles for towing trailers and for employment also creates particular requirements for parking.

The above 5 paragraphs make it clear from the description that the old Canteen Site on Bath Old Road is just not a suitable size or location. Please can you tell me what you intend to do about these points.

As I understand it from BANES website, the majority of Radstock is a conservation area, including the Bath Old Road.

Planning permission for a number of houses on the canteen site was turned down on the grounds that it would impinge on the conservation area - a number of trailers and caravans on this site would enhance it? BANES guidelines also state that no travellers sites should be within 1.5km of a conservation area, this would place it right in the middle of one. To put travellers on this site would involve screening and access issues which would impinge on the nature of the conservation area. How do you plan to overcome your own guidelines?

Although we don't actually live on the Bath Old Road the effect of this proposal is already being felt in house prices. Our house has been on the market for 2 months and we have not had a single viewing. The agents have advised this is mostly due to the ongoing consultation process over the uncertainty of the site on Bath Old Road. People do not want to move into an area where there may be upheaval in the future. As for the poor residents who actually live opposite the site their house prices will halve if you continue with this proposal, ensuring that a lot of them will be stuck there and not be able to afford to move on.

Respondent: 3311 / 1 Name: Mrs Catherine Dewar Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

As a resident in the Bath Old Road neighbourhood I would like to put forward my views on the aforementioned proposal.

We were very concerned to hear of a sudden meeting called in the Whisty Community Centre to discuss the proposal to put a Gypsy and Traveller site on the Old Canteen site in Bath Old Road. This was the first we had heard of any proposal and were surprised that such a thing could be proposed without the local residents knowledge. When there were questions over the use of the Victoria Hall in Radstock we all received a letter detailing the proposals - why did we not have the same for the Gypsy sites? Was it because the council were too scared of the public response? Did they think they could just do it quietly and we would all accept it? Why have you not followed the usual democratic process that would be expected in these circumstances?

We know the Bath Old Road area very well and use it daily. It is always extremely busy with cars parked both sides of the road. Allowing access to the old school site will make this worse as the residents and visitors will have to park further up and down the road. With all the parking issues I cannot see how a traveller would be able to pull his caravan or trailer into the site without causing a lot damage either to his vehicles or the neighbouring ones. How do you propose to overcome this issue?

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Site Perimeter and Boundaries:

Para 4.10 The site boundary must provide clear demarcation of the perimeter of the site, so as to prevent nuisance for existing residents created by others seeking to move on to the site without permission. Boundaries should take into account adjoining land uses, and be designed with the safety and protection of children in mind' The canteen site itself is very small and it would be difficult for any travellers to use it effectively without spreading out on to the rest of the old school site. How do you propose to prevent this?

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The above 5 paragraphs make it clear from the description that the old Canteen Site on Bath Old Road is just not a suitable size or location. Please can you tell me what you intend to do about these points.

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Respondent: 3311 / 1 Name: Mrs Catherine Dewar Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We were very concerned to hear of a sudden meeting called in the Whisty Community Centre to discuss the proposal to put a Gypsy and Traveller site on the Old Canteen site in Bath Old Road. This was the first we had heard of any proposal and were surprised that such a thing could be proposed without the local residents knowledge. When there were questions over the use of the Victoria Hall in Radstock we all received a letter detailing the proposals - why did we not have the same for the Gypsy sites? Was it because the council were too scared of the public response? Did they think they could just do it quietly and we would all accept it? Why have you not followed the usual democratic process that would be expected in these circumstances?

We know the Bath Old Road area very well and use it daily. It is always extremely busy with cars parked both sides of the road. Allowing access to the old school site will make this worse as the residents and visitors will have to park further up and down the road. With all the parking issues I cannot see how a traveller would be able to pull his caravan or trailer into the site without causing a lot damage either to his vehicles or the neighbouring ones. How do you propose to overcome this issue?

Why are you not following the government guidelines that lay out Good Practice for Designing Gypsy and Travellers Sites? During my research I found the following government paper <http://www.communjtes.gov.uk/documents/housing/pdf/designinggypsiesites.pdf> 'Designing Gypsy Sites which raises a number of issues:

Access for Emergency Vehicles•

Para 4.25 states 'In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles' How do you propose to overcome this problem when there is parking down both sides of the road? It also states 'more than one access route into the site is recommended.' With houses to the side and rear of the site how do you suggest this happens?

Visual and Acoustic Privacy:

Para 4.1 'Sites should be developed in accordance with existing planning policies and designations, with particular regard made to: Convenience for residents; Safety for residents; Visual and acoustic privacy- both for people living on the site and those living nearby; Aesthetic compatibility with the local environment; Scope for social integration with the local community. ' I understand this means that any proposed site would have to be adequately screened and sectioned off from the surrounding houses. How do you intend to do this?

Privacy for Residents•

Para 4.14 'As with housing for the settled community, site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other's living quarters), but without inhibiting the important sense of community'. How do you propose to do that without changing the whole look of the area, or impinging on the existing light and view for the residents who currently live there?

Site Perimeter and Boundaries•

Para 4.10 'The site boundary must provide clear demarcation of the perimeter of the site, so as to prevent nuisance for existing residents created by others seeking to move on to the site without permission. Boundaries should take into account adjoining land uses, and be designed with the safety and protection of children in mind' The canteen site itself is very small and it would be difficult for any travellers to use it effectively without spreading out on to the rest of the old school site. How do you propose to prevent this?

Safe environment for residents:

Para 3.3 'It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children'. Are disused school buildings, which may contain asbestos in the roof not construed as hazardous? It would be extremely tempting for children to explore, especially if they have easy access to it. What would be done to prevent this?

Space. Density and Spacing fro Caravans:

Para 7.12 'It is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc), parking space for two vehicles and a small garden area. Para 4.17 In designing the layout of a site enough space must be provided to permit the easy maneuverability of resident's own living accommodation both to the site and subsequently on to a pitch. Account needs to be taken of a more recent tendency for members of the Gypsy and Traveller communities to favour the use of a mobile home in place of the traditional caravan, and some mobile homes could be up to around 25 metres in length. para 4.13 Measures to protect the safety of site residents from fire are of paramount importance, and it is essential that a clear gap of 3 metres is provided within the inside of all site perimeter boundaries as a fire prevention measure. para 7.8 small pitches may become quickly overcrowded. Larger than average family sizes, alongside the need for vehicles for towing trailers and for employment also creates particular requirements for parking.

The above 5 paragraphs make it clear from the description that the old Canteen Site on Bath Old Road is just not a suitable size or location. Please can you tell me what you intend to do about these points.

As I understand it from BANES website, the majority of Radstock is a conservation area, including the Bath Old Road. Planning permission for a number of houses on the canteen site was turned down on the grounds that it would impinge on the conservation area - a number of trailers and caravans on this site would enhance it? BANES guidelines also state that no travellers sites should be within 1.5km of a conservation area, this would place it right in the middle of one. To put travellers on this site would involve screening and access issues which would impinge on the nature of the conservation area. How do you plan to overcome your own guidelines?

Although we don't actually live on the Bath Old Road the effect of this proposal is already being felt in house prices. Our house has been on the market for 2 months and we have not had a single viewing. The agents have advised this is mostly due to the ongoing consultation process over the uncertainty of the site on Bath Old Road. People do not want to move into an area where there may be upheaval in the future. As for the poor residents who actually live opposite the site their house prices will halve if you continue with this proposal, ensuring that a lot of them will be stuck there and not be able to afford to move on.

Respondent: 3325 / 1 Name: Mrs Barbara Quintanilha Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The proposed site in Bath Old Rd. There is some query as to who actually owns the whole site as it was a gift from lord Waldegrave in 1903 for the "education of the poor in the area" under school sites A in 1841. There is possibly "Rights of

Reversion" where the land should have been returned to him when ceased to be the site of Radstock Infants School in 2007. Has the council recently assessed the need of the travellers? (The last assessment was done in 2007) Is the council applying the 2012 Government guidelines or is it trying to pass this through on old ruling?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO! NO! NO! I strongly disagree. The site is very restricted in size and could impinge on not only the local houses but it will go against Travellers. (It is accepted fact that Travellers like open sites)This site is far too close to other residence which is not beneficial to either party. A proposal for a number of houses on that site was refused and overlooked the properties in the round and also that they didn't meet conservation standard of building. The access to the site is appalling. The road is badly congested most of the time with parking on both sides of the road. Bath Old Road is used during rush hours as a "Rat Run". The access to the canteen site would be impossible.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO! The potential pitch provision states that it would provide two permanent pitches for that site in Bath Old Road. But it doesn't say in pitch is static home or caravan. No, it may provide for at least 2 mobile home, 2 caravans, 2 sheds, 2 amenity buildings, parking for 4 cars and bikes. The definition of pitch is vague to say the least. The site is far too small for all this.

Do you have any other general comments on the Preferred Options paper?

I cannot see any traveller wishing to live in close proximity to other static people, with the site being screened. It would be impossible to screen the site from the south side adjacent No 19 without having serious impact on residents view being so high and blocking the light. The travellers whole culture is based on outdoor life and travelling. To be stuck behind some screen in a wedge of land on top of each other is not a pleasant prospect. Might as well pass the travellers into commercial housing. The land could be used to benefit the local community. A brilliant site for small children, or used as an allotment area for the local residents. (There is a waiting list for the site as Hayden is the only site in the area)

Respondent: 3325 / 1 Name: Mrs Barbara Quintanilha Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

According to the local M.P Mr. J.Rees-Mogg, the instructions to the local council from CENTRAL GOVERNMENT are:

1) To avoid the use of greenbelt or conservation areas. Radstock became a designated conservation area in 1999 to protect the unique heritage of the area and the north east Somerset coalfields. In the Bath Old Road area this conservation applies to the buildings and built environment(such as walls) The buildings have historic and cultural significance as part of Radstock, which has been described as the best preserved mining town in England. Thus the walls in Bath Old Rd.(among the wall in front of the canteen which is in proposed site and front garden walls are PROTECTED).B@NES consultation document "Gypsies,Travellers& Travelling show people site allocation development plan document(DPD) statement of consultation(Feb.2012) states: Q9.4.34. SITES SHOULD NOT BE LOCATED WITHIN 1. 5KM OF A CONSERVATION AREA. Forget 1.5km within RADSTOCK IS A DESIGNATED CONSERVATION AREA!

2) Informed local consent needs to be secured. This being emphasized in the guide lines that the welfare of the local residence be given equal importance in balance with the need to find a traveller side. Why the settled community of Bath Old Road was NOT consulted about the proposals to put a Travellers site in the old infant school prior to the site being shown to the travellers? I find it very peculiar that proper consultations have not taken place prior to an article in a local

newspaper. This looks like the council is trying very hard to push it through on the quiet before the elections. How come the proposals of developing of Victoria Hall in the town which is also the subject to consultation has been accompanied by a door-to-door leaflet drop informing local residents of the options. Why nothing like that has been done with the proposal of Gypsy/Travellers site?

3) According to B&NES planning regulations, any alternations or additions to properties in conservation area, which Bath Old Road is, have to enhance the historic visual aspect. How does a proposed Travellers site in Bath Old Rd qualify for this? As the proposed site at the old infant was gifted in 1903 for the "education of the poor in the area" it should be given back to education and used as a nursery which is in temporary buildings at the moment.

Respondent: 3326 / 1 Name: Ms Stephanie Broadhurst Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Bath Old Road Site- With all the resident parking this would be a wholly unsuitable site for Travellers. Even without the increase in traffic, movement there is very scarce on vehicular movement on Bath Old Road, with delays and blockages caused by single track width.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I have no idea- it's a completely unfeasible site

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I think

Do you have any other general comments on the Preferred Options paper?

No

Respondent: 3327 / 1 Name: Mr Tomas Quintanilha Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

According to the local M.P Mr. J. Rees-Mogg, the instructions to the local council from central government are:

- 1) To avoid the use of greenbelt or conservation areas.
- 2) Informed local consent needs to be secured. This being emphasized in the guide lines that the welfare of the local residence be given equal importance in balance with the need to find a travelers site.
- 3) According to B&NES planning regulations, any alterations or additions to properties in a conservation area, which Bath Old Rd is, have to enhance the historic visual aspect. How does a proposed Travelers site in Bath Old Rd qualify for this? Why was the settled community of Bath Old Rd not consulted about the proposals to put a travellers site in the old infant school prior to the site being shown to the travelers? I find it very peculiar that proper consultations have not taken place prior to an announcement in the local paper. This looks as though the council is trying to push this through planning on the quiet. Your comments on this point would be appreciated with supporting documentation from the council meetings As the proposed site at the old infant school was gifted in 1903 for the "education of the poor in the area"; It should be given back to education and used as a nursery which is in temporary buildings next to the Academy of Trinity. I would be grateful

to hear your response to these enquires as soon as possible.

Respondent: 3327 / 1 Name: Mr Tomas Quintanilha Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The proposed site is Bath Old Road is the old site of Trinity Primary School using land donated for that purpose by Lord Waldegrave in 1903. The council have not given any clear legal view that the Lord should not have been returned to the successors of the original owners of the land once its use for educational purpose ceased. The land has remained derelict since the school was relocated in 2007. Casual view of the site shows that considerable renovation/remedial works will be required to bring it to the standards for a traveller site. This is without any investigation for hazardous materials e.g. asbestos. Would the costs of all the world be economic for a site which only accommodates 2 pitches?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No! It is an accepted fact that Travellers like open sites with extensive storage opportunities etc. This site is extremely constrained: Old Bath Road is a narrow thoroughfare with extensive domestic parking throughout the built up area. Sadly it is also used as a rat run for access to Radstock. It is neither appropriate for long term, use for mobile home access or for the disruption and access during development of the site. It is a conservation area. Planning proposals have been rejected for housing both on conservations standards and because of overlooking neighbours. These will apply equally if not more for traveller sites.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No! The potential pitch provision is recognised as only being for 2 permanent pitches. As explained above it is a restricted access site already in an extensively developed part of a conservation area. These would appear to be in contradiction to several of the councils own stated guidelines.

Do you have any other general comments on the Preferred Options paper?

It is accepted that travellers still practice "extended families" all on the same site. Indeed in other contexts that is seen as a strength. That being the case this site is restricted to two pitches could seem inappropriate. The council would be better served in meeting their obligations in seeking a large site in a less built up area with good access from the surrounding area.

Respondent: 3328 / 1 Name: Mr Simon Peters Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site I wish to comment on is in Radstock- former school canteen. It is neither suitable or achievable as a site.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I don't. The councils assessment has ignored the obvious with its desire to allocate enough sites to meet government targets. Efficient use of land could be a whole number of things. Permanent housing in keeping with environment? The site may not be green belt but is a conservation area. The council recommended no sites should be ain a conservation area. Access to site is a huge issue- the road is busy and overcrowded. Inadequate parking and poor visibility from other roads onto main road. The council need to assess the road after 4.30 not during the day. I cannot understand how sensitive pitch design is possible. Existing screening, what is that? The pitch is so narrow and close to houses a fence or wall would alienate both the gypsies and the local community. The site is available for development but previous application was turned down as not in keeping with area.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO! From my points about no for the main reasons-
-traffic issues and access

- planning- poor pitch design with locality of neighbours
 -Conservation area since 1999 to protect unique heritage of area.

Do you have any other general comments on the Preferred Options paper?

The preferred options paper is not a helpful document. You refer to a previous consultation yet as a local resident the first I heard of it was through the local press. I understand why the sites are needed but the site I am focusing on is completely inappropriate.

Respondent: 3331 / 1 Name: Mr Patrick Smith Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes, Re the Bath Old Road site;
 Patrick Smith was born at 21 Bath Old Road and now in his 70's still lives in the house next to the school field. I was brought up at number 23.

Traffic: In the last decade traffic and parking in this road has become very hazardous. The road is used as a rat run and there are frequent near misses on the corner below the proposed site. Far from easing when the school closed the problem has become worse. As one of the very few properties with a drive we find entering and leaving the drive is a real challenge. Cars park close to and opposite on what is a narrow road, and which in fact is single track with cars parked solidly both sides. The terraced houses have no off street parking. When my aunt was ill last year the ambulance was called several times and always had to just stop in the road, blocking it. Unless the site has adequately wide turning space moving vehicles in and out will be problematic and there is no space for extra vehicles to park on the street. Congestion at the steep bend will also be a risk.

The school buildings contain asbestos, which will be expensive to remove. We have been concerned since the school closed about the deterioration of the fabric of the school and grounds and Mr Smith has to regularly clear bushes and brambles growing in the school field over the old stone boundary wall. Left unchecked he would be unable to access his side path and dust bins.

This task becomes harder each year, This growth is seriously weakening the wall, which belongs to the council and which is becoming unstable and may well collapse on any children playing nearby.

No maintenance work has been done to the wall by the council, for many years, although I understand there was correspondence about this in the past. It would probably need extensive rebuilding to make it safe.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

While we accept that the site meets the criteria in some of the areas identified we believe that others have been over scored.

Access to the highway is not safe it's a rat run on a hill especially at peak times when children would be going to school and need to cross.

Unless the proposal is to demolish both asbestos ridden buildings it is a hazardous site. Any child living next to a derelict school will find an inviting and dangerous playhouse.

The boundary wall with no.21 is probably unsafe and in any case not high enough to give screening and privacy.

Transport is needed for family shopping due to steep hill and rare public transport.

Radstock is a conservation area and the whole site would be far better served as a housing development in keeping with the area, possibly providing extra parking spaces for residents under a voucher scheme as is found in cities, which would provide income to the council.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Absolutely not.

While we understand and sympathise with the need for the travelling community to have safe pitches. From my experience of working with and providing medical care to Show Folk I really cannot see that this is a suitable area to place them to be put.

As stated this form completed by me on behalf of Mr Smith who lives alone and is finding this unexpected development, next door to his lifetime home extremely distressing at his time of life. I am seriously concerned for his welfare.

Do you have any other general comments on the Preferred Options paper?

Not at this time

Respondent: 3372 / 1 Name: Mrs J Field Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

As a resident, my house is directly opposite the proposed site, and I find it ludicrous to put it in the middle of a residential area.

The road is already heavily congested, with minimal parking for residents, and I feel that any further traffic will make this road unsafe. I feel it highly ridiculous and somewhat laughable to try and manoeuvre several static caravans around Bath Old Road, when there is passing traffic on both sides, and parking on both sides. Not only is there passing traffic from residents, but a lot of people use the road as a 'short cut' from Bath and Peasedown St John. The extra traffic would have a knock on effect to local residents which I believe is most unsuitable.

I find it unfair how the site which is known as a "conservation area" has been refused planning permission for housing, because they did not fit in with the area, yet the current proposals are being pushed through? How come housing was refused and a Travellers site seems appropriate, this goes against conservation rules.

There would be a huge impact on the character of the current buildings if this proposed site was to be placed on this "conservation area". A travellers' site would look extremely out of place at Bath Old Road, and I find it hard to comprehend how the council have deemed it suitable. New developments should blend in and compliment local surroundings, and I feel this does neither. I'm very cross that BANES have known about this since 2010, and we as council tax payers and residents have only just found out by reading it in the paper.

Thank you for taking the time to read my letter.

Respondent: 3372 / 1 Name: Mrs J Field Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

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Respondent: 3373 / 1 Name: Mrs C A Williams Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I feel I must write to you about your plan to put a Traveller site in Old Bath Road I cannot believe anyone would think this a suitable site- I would like to see someone try to get a a small caravan onto the site let alone the caravans that some of the travellers use the road is small with parking on both sides for residents

The site is too near other houses and both their and the travellers privacy would be compromised.

The area is a conservation area and has many rules which you as council enforce with great gusto when any one wishes to build or alter a building so if travellers are to be treated the same as the already in situ residents the rules must be followed within council and government guidelines.

These plans have been rushed through it seems in the hope that no one would notice the travellers until it was a fate a' compli

Please think again a traveller site in the middle of a residential area if this site is suitable why not on the land in front of Tim Ball House it's about the same size.

Respondent: 3373 / 1 Name: Mrs C A Williams Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

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Please think again a traveller site .in the middle of a residential area I r this site is suitable why not on the land in front of Tim Ball House it s about the same size.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3376 / 1 Name: Sir or Madam Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

We are disgusted to even think you would be attempting to put Travelers/Gypsies on the site at Old Bath Road, former Radstock Infant School canteen. Once they are there what is going to happen to the rest of the land will they invite all their friends to come and stay.

There are good sites around Bath i.e.; between the Park & Ride- Bath Reclamation Site (Old Fuller Earth) this is no mans land, also how about pulling down Old Kingmead Flats and put them there but town sites would not look good for town people. You just want to put the rubbish out here between houses built in local quarry stone, so it would devalue all the houses in this area but not the town houses.

One person has already lost the sale of his house through this just being put in the paper so will all the houses in this area drop in price once this is passed.

Would you buy one next to this site?

So find an area out in the country for them NOT in residential areas.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3451 / 1 Name: L.G Merrifield Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

On the grounds of traffic flow, access to properties and road safety I consider this to be an ill-thought and impracticable suggestion and ask if you could oppose it. My reasons for objecting to this plan are set out below.

Bath Old Road runs in a loop from the A367 south of Peasedown St John until it re-joins it in Radstock Town Centre. It may conveniently be divided into three parts and it is the centre section from the junction with Mendip Way to that of Woodborough Road that is my main concern.

This stretch of a few hundred yards is bounded at each end by a steeply sloping blind bend and is subject to a thirty mile per hour speed limit. The pedestrian pathway is not continuous. Currently it serves the resident homes for access, deliveries, farm traffic and is also used as a short cut (rat run) for traffic to avoid queues on the Bath New Road (A367). Bath Old Road is lined on both sides with rows of terrace housing which do not have parking spaces, neither garages, side entrances, nor forecourts. Consequently, residents are obliged to park on the carriageway.

At any time this results in a continuous line of parked vehicles with a one vehicle wide strip in the centre of the road.

The proposal would increase the number of vehicle movements and access would need to be enlarged to the site in order for towing vehicles and caravans or mobile homes with their considerable turning circles to be able to enter/exit the area.

This could only be achieved by reducing the already packed parking area available to present day residents. Much is made on behalf of the proposers that it only involves 'two pitches', although the definition of 'a pitch' depends on whom you ask.

What must be obvious is that the area for caravans will increase as time passes due to expansion from within and the fact that the remainder of the area will not be attractive to anyone else.

A situation would ensue where a large number of vehicles would be introduced into a residential road which is already overcrowded. This, I contend would cause road blockages disrupting legitimate journeys and quite probably an increase in road accidents.

Respondent: 3451 / 1 Name: L.G Merrifield Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

My objections relate to the effect the site would have on congestion, lack of parking facilities and a possible increase in road accidents. These reservations are set out in detail in my letter to Councillor Tim Ball of 14/6/12 which he acknowledged on 28/6/12

Respondent: 3464 / 1 Name: Mr Gavin Miles Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Bath Old Road

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I feel quite upset that the council has wasted its time and resources on such an unsuitable site. The site is located within a busy residential area, with limited parking and a road, that is already used as a rat run. I am worried I will not be able to sell my home. And if I did it probably would decrease in value because of this potential site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I strongly disagree

Do you have any other general comments on the Preferred Options paper?

I am highly concerned with the other buildings adjacent to the school. I am aware of the amount of asbestos within the buildings. I am contacting the H.S.C because I believe if anybody close by tampered with this buildings through vandalism etc there is a massive potential to contaminate the whole area. I believe the council will have to demolish all buildings on this site for the rest of the communities health and safety.

Respondent: 3469 / 1 Name: Mr+ B Gabbedey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Letter dated 10 July 2012

Dear Mr Trigwell

Reference: Gypsy and Traveller site, Radstock

Further to attendance at your exhibitions and subsequent meetings concerning Bath Old Road, Radstock Infant School site we consider the proposal as impracticable and additional to road safety concern in an already busy vehicle movement road. Bath Old Road is a feeder road for the many residential properties in the immediate vicinity, it is also used as a short cut, rat run, by non residents, delivery vehicles, farm vehicles, coaches and the occasional 44 ton lorry that has lost its way or due to traffic congestion on the A367 between Peasedown St John and Radstock and all traffic has been diverted. With blind bends top and bottom of the road and parked vehicles both sides from just below Mendip Way the road becomes a single carriageway down the middle. Has a risk assessment been undertaken?

This proposal, we contend only adds to an existing situation for the residents. It is difficult enough for the residents now with the level of traffic movement and lack of parking facility within the road without additional vehicles required for towing let alone the extra turning circle required.

Having worked within the construction industry dealing amongst others, vehicle movement, plus having been a trustee in the caring community with responsibilities for health and safety matters. The proposal is high risk on a H&S matrix.

Yours sincerely ..

Preferred Options Response From comments:

Having read doc DPD it is a totally inappropriate development proposal that contradicts Planning.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO. With the site in a conservation area its access both to the site and the not so excellent access to local services and facilities the proposal is flawed with inaccurate information. Bath Old Road is a steep hill to climb and is a busy feeder road. Towing vehicles need a large turning access and will take both sides of the road, parking is already at a premium as most properties were built well before the thoughts of todays transport.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO. The site offers a greater potential than is proposed as it could well provide an amenity value to local residents. Also on the grounds of Access (DPD, Vehicular considerations) and the possibility your thinking this to be mixed use (DPD 4.10) site.

Do you have any other general comments on the Preferred Options paper?

Concerns for all regarding Traffic Safety issues in this Conservation and overcrowded (traffic wise) vicinity of Bath Old Road.

Respondent: 3470 / 1 Name: Ms Debra Turvey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The preferred site in Bath Old Road is not suitable for a variety of reasons.

- 1) It is in a designated conservation area
- 2) Having read the NPPF guidelines, this site is highly unsuitable
- 3) Bath Old Rd already has traffic problems including major congestion as people use it as a cut through. Access would be difficult if not dangerous
- 4) The negative effect on value of neighbouring properties

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Not at all, this preferred site does not even fall in with the councils own guidelines on National Planning Policy Framework. Not sure how the site made it to the list.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not

Do you have any other general comments on the Preferred Options paper?

I feel concerned that when guidelines have been set out for NPPF that sites are even considered when they do not fall in line with these guidelines. I also have a concern at the cost to even make this site suitable. I would hope that this site is take off the list.

Respondent: 3471 / 1 Name: Mr Martin Turvey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The proposed site in Bath Old Road, Radstock is not at all suitable for a number of reasons:

- It is located in a designated conservation area and the siting of travellers here will have a significant negative effect on the environment
- The road already suffers major congestion and access would be extremely dangerous
- The National Planning Policy Framework guidelines render this site completely unsuitable
- The site will have a negative impact on current value of neighbouring properties

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, the location of this site contravenes the councils own guidelines on planning and DPD. It should not even have reached the short list.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3478 / 1 Name: Mr Jack Marriott Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Any relevant evidence or information is presented throughout my responses in support of my many concerns over the suitability of the proposed Bath Old Road site.

The main areas of concern, which lead me to believe that the Bath Old Road site is wholly inappropriate are:

- Bath Old Road is designated as a conservation area, therefore the development of a gypsy and traveller site in this area would be contradictory to the B&NES description of the purpose of such a designation which is set out in the document 'Living in a Conservation Area'.
- The congested nature of Bath Old Road is such that it will not be possible to provide suitable and safe access to the proposed site, with acceptable levels of visibility, without significantly worsening the existing congestion and parking issue on the road.
- There is a need for additional affordable housing in Radstock and the proposed site, and the wider neighbouring school site, would be far more suitable for the development of housing (in keeping with the surrounding area) than for the development of a gypsy and traveller site. In the B&NES Housing Land Availability Assessment (SLHAA - Report of Findings - May 2011 - Appendix 1 dii) the whole school site is recognised as having potential for 14 dwellings.

Given that Bath Old Road is not a suitable option, the council should look to alternative plots including the three Ministry of Defence sites at Foxhill, Enleigh and Warminster Road, which will soon become available (and are currently earmarked for housing development). These sites would make far more suitable gypsy and traveller sites. If there is a need for additional housing within the council, then some of the sites within the Preferred Options paper should be re-considered for this purpose, including Old Bath Road.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the councils assessment of opportunities and constraints on the Bath Old Road site.

The Preferred Options paper states that "Development of this site within the Radstock Conservation Area, and surrounded by residential properties would require sensitive pitch design to maximise residential amenity and privacy. Existing screening at the site would assist with this aim." The only existing feature of the site which effectively screens the site from view at road level is the old stone wall running parallel to the pavement at the front of the site. In appendix E of the detailed site assessment carried out by B&NES it is stated that "Works would be required to make the site suitable for residential use, including the demolition of the existing building and the boundary wall to the front of the site." Not only would the demolition on the old stone wall fronting the site be damaging to the character of the conservation area, but it would also effectively remove the only existing feature of the site which screens it from the road and from the neighbouring houses. Given the narrow width of the site and the poor access from the road, it is likely that the majority of the front of the site will be open for access thus leaving little scope for sympathetic screening. In addition, given that the majority of the neighbouring houses have views of the site from a high level, including loft conversions, no amount of "sensitive pitch design" of screening would give the gypsy and traveller residence the level of privacy required. Neither will the screening be able to obscure the view of caravans/trailers, which will be alien within the surrounding setting and thus damaging to the character of the area.

The Preferred Options paper also states that "Access to the site may require works to improve visibility." Given the congested nature of the road and the existing on street parking, it is likely that in order to provide the necessary levels of visibility in order that the site can be entered and exited safely, it may be necessary to restrict the level of existing residential parking at the front of the site. This will have a significant effect of the amount of on street parking available for local residents and will exasperate the existing parking issue on Bath Old Road.

Finally, it is stated in the Preferred Options paper that "[The sites] reuse as a permanent Gypsy site would make efficient use of previously developed land." and that "The development of this site would meet a need for a small residential (permanent) site." Given the narrow width of the proposed site and the larger than average size of the vehicles which may require regular access, I would presume that it will be necessary to allot a significant proportion of the site, along the majority of its length, for access and turning. As such, I do not feel that such a development would be an efficient use of the land.

Another important issue that should be considered when reviewing the proposed development is that of road access and safety. Bath Old Road is already a congested street with cars parked on both sides of the road on a 24-hour basis, leaving only a narrow carriageway for traffic to pass. The road is also used as a 'rat-run' in the mornings and evenings as motorists attempt to avoid traffic on New Bath Road. Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that "satisfactory means of access can be provided and the existing highway network is adequate to service the site." It is my opinion that this criteria is in no way met by the proposed Bath Old Road site. Currently it would be very difficult to drive a car towing a trailer from one end of the road to the other and would be practically impossible to manoeuvre the same vehicle onto the site based on the current site access and on-street parking. Visibility is also very limited when pulling onto the road and this is a serious safety concern. In order to allow realistic access and room to manoeuvre larger vehicles in and out of the proposed site, with acceptable levels of visibility, significant parking restrictions would be required in the vicinity of the site and this would have a significant impact on all of the existing local residents on a road that is already over congested with parked cars. It should be considered that a proposed housing development on the land neighbouring the site was rejected on planning grounds in part due to parking issues.

In addition to the above issues, the site is overlooked by all of the immediately surrounding houses, many of which (including mine) have loft conversions offering views of the site from a height. Therefore, not only will the site detract from

the character of the area visible to all neighbouring properties, but the site will also not provide the level of privacy that the settling gypsy/traveller community would be entitled to.

I would also like to add that I believe the format of this response form and the questions asked within are not fit for purpose. There seems to have been little consideration of how the form will be interpreted and completed by local residents such as myself and seems to meet only the councils requirements. There is no supporting information as to how the form should be completed the questions asked within are ambiguous to varying degrees. Many of the comments I have included within my response could equally have been included within different sections of the form and still have been relevant to the heading of that section.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3479 / 1 Name: Ms Holly Prichard Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Any relevant evidence or information is presented throughout my responses in support of my many concerns over the suitability of the proposed Bath Old Road site.

The main areas of concern, which lead me to believe that the Bath Old Road site is wholly inappropriate are:

- Bath Old Road is designated as a conservation area , therefore the development of a gypsy and traveller site in this area would be contradictory to the B&NES description of the purpose of such a designation which is set out in the document 'Living in a Conservation Area'.
- The congested nature of Bath Old Road is such that it will not be possible to provide suitable and safe access to the proposed site, with acceptable levels of visibility, without significantly worsening the existing congestion and parking issue on the road.
- There is a need for additional affordable housing in Radstock and the proposed site, and the wider neighbouring school site, would be far more suitable for the development of housing (in keeping with the surrounding area) than for the development of a gypsy and traveller site. In the B&NES Housing Land Availability Assessment (SLHAA- Report of Findings-May 2011 -Appendix 1 dii) the whole school site is recognised as having potential for 14 dwellings.

Given that Bath Old Road is not a suitable option, the council should look to alternative plots including the three Ministry of Defence sites at Foxhill, Enleigh and Warminster Road, which will soon become available (and are currently earmarked for housing development). These sites would make far more suitable gypsy and traveller sites. If there is a need for additional housing within the Council then some of the sites within the Preferred Options paper, should be re-considered for this purpose, including the Old Bath Road.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the councils assessment of opportunities and constraints on the Bath Old Road site.

The Preferred Options paper states that "Development of this site within the Radstock Conservation Area, and surrounded by residential properties would require sensitive pitch design to maximise residential amenity and privacy. Existing screening at the site would assist with this aim." The only existing feature of the site which effectively screens the site from view at road level is the old stone wall running parallel to the pavement at the front of the site. In appendix E of the detailed site assessment carried out by B&NES it is stated that "Works would be required to make the site suitable for residential use, including the demolition of the existing building and the boundary wall to the front of the site." Not only would the demolition on the old stone wall fronting the site be damaging to the character of the conservation area, but it would also effectively remove the only existing feature of the site which screens it from the road and from the

neighbouring houses. Given the narrow width of the site and the poor access from the road, it is likely that the majority of the front of the site will be open for access thus leaving little scope for sympathetic screening. In addition, given that the majority of the neighbouring houses have views of the site from a high level, including loft conversions, no amount of "sensitive pitch design" of screening would give the gypsy and traveller residence the level of privacy required. Neither will the screening be able to obscure the view of caravans/trailers, which will be alien within the surrounding setting and thus damaging to the character of the area.

The Preferred Options paper also states that "Access to the site may require works to improve visibility." Given the congested nature of the road and the existing on street parking, it is likely that in order to provide the necessary levels of visibility in order that the site can be entered and exited safely, it may be necessary to restrict the level of existing residential parking at the front of the site. This will have a significant effect of the amount of on street parking available for local residents and will exasperate the existing parking issue on Bath Old Road.

Finally, it is stated in the Preferred Options paper that "[The sites] reuse as a permanent Gypsy site would make efficient use of previously developed land." and that "The development of this site would meet a need for a small residential (permanent) site." Given the narrow width of the proposed site and the larger than average size of the vehicles which may require regular access, I would presume that it will be necessary to allot a significant proportion of the site, along the majority of its length, for access and turning. As such, I do not feel that such a development would be an efficient use of the land.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3479 / 1 Name: Ms Holly Prichard Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

We are writing to make clear that, as local residents, we strongly oppose the proposed Gypsy and Travellers site on Old Bath Road.

I, Jack Marriott (25), and my partner, Holly Prichard (26), secured a mortgage for our first house, on Old Bath Road, in June 2011. We have both worked very hard to get ourselves onto the first rung of the property ladder and are extremely concerned over the proposed plans to develop and Gypsy and Traveller site on the old school land opposite our house, and the impact that we feel this development would have on the local community and amenities.

There are a number of reasons that we feel make the proposed development wholly inappropriate.

Firstly, and most importantly, Radstock is a conservation area with a rich heritage and Bath Old Road is currently a street which very much reflects this, with period houses lining both sides of the street. B&NES Planning Department outlines purpose of the conservation area designation in the document 'Living in a Conservation Area'. It is clearly stated that "Conservation Area designation (provides)... the basis for policies designed to preserve or enhance all aspects of the character or appearance of an area that define its special architectural or historic interest." It is our opinion that the proposed gypsy and traveler site would be a direct contradiction of this and that no amount of sympathetic landscaping could mitigate the negative impact that the presence of caravans and trailers would have on the character of the road. This will be particularly evident for us, living at Number 72, as the proposed site is in full view of all of our frontward facing windows.

B&NES Policy CP11 of the Draft Core Strategy which includes a number of requirements for assessing traveller site suitability states that a site must "not harm the character and appearance of the surrounding area", and in Appendix E of the Detailed Site Assessment for Bath Old Road, B&NES state that "In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable." We therefore feel that the proposed development is completely inappropriate on these grounds alone.

Another important issue that should be considered when reviewing the proposed development is that of road access and safety. Bath Old Road is already a congested street with cars parked on both sides of the road on a 24-hour basis, leaving only a narrow carriageway for traffic to pass. The road is also used as a 'rat-run' in the mornings and evenings as motorists attempt to avoid traffic on New Bath Road. Policy CP11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that "satisfactory means of access can be provided and the existing highway network is adequate to service the site." It is our opinion that this criteria is in no way met by the proposed Bath Old Road site. Currently it would be very difficult to drive a car towing a trailer from one end of the road to the other and would be practically impossible to maneuver the same vehicle onto the site based on the current site access and on-street parking. Visibility is also very limited when pulling onto the road and this is a serious safety concern. In order to allow realistic access and room to maneuver larger vehicles in and out of the proposed site, with acceptable levels of visibility, significant parking restrictions would be required in the vicinity of the site and this would have a significant impact on all of the existing local residents on a road that is already over congested with parked cars. It should be considered that a proposed housing development on the land neighboring the site was rejected on planning grounds in part due to the limited on-street parking.

In addition to the above issues, the site is overlooked by all of the immediately surrounding houses, many of which (including ours) have loft conversions offering views of the site from a height. Therefore, not only will the site detract from the character of the area visible to all neighboring properties, but the site will also not provide the level of privacy that the setting gypsy/traveller community would be entitled to.

Thank you for taking the time to read our objections. Having lived on Old Bath for one year now, we are very settled in our home and in this peaceful community and hope that you will share our view that the proposed Gypsy and Traveller development is inappropriate for Bath Old Road.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3479 / 2 Name: Ms Holly Prichard Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Any relevant evidence or information is presented throughout my responses in support of my many concerns over the suitability of the proposed Bath Old Road site.

The main areas of concern, which lead me to believe that the Bath Old Road site is wholly inappropriate are:

- Bath Old Road is designated as a conservation area, therefore the development of a gypsy and traveller site in this area would be contradictory to the B&NES description of the purpose of such a designation which is set out in the document 'Living in a Conservation Area'.
- The congested nature of Bath Old Road is such that it will not be possible to provide suitable and safe access to the proposed site, with acceptable levels of visibility, without significantly worsening the existing congestion and parking issue on the road.
- There is a need for additional affordable housing in Radstock and the proposed site, and the wider neighbouring school site, would be far more suitable for the development of housing (in keeping with the surrounding area) than for the development of a gypsy and traveller site. In the B&NES Housing Land Availability Assessment (SLHAA- Report of Findings-

May 2011 -Appendix 1 dii) the whole school site is recognised as having potential for 14 dwellings.

Given that Bath Old Road is not a suitable option, the council should look to alternative plots including the three Ministry of Defence sites at Foxhill, Enleigh and Warminster Road, which will soon become available (and are currently earmarked for housing development). These sites would make far more suitable gypsy and traveller sites. If there is a need for additional housing within the council then of the sites within the Preferred Options paper should be re-considered for this purpose including Bath Old Road.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the councils assessment of opportunities and constraints on the Bath Old Road site.

The Preferred Options paper states that "Development of this site within the Radstock Conservation Area, and surrounded by residential properties would require sensitive pitch design to maximise residential amenity and privacy. Existing screening at the site would assist with this aim." The only existing feature of the site which effectively screens the site from view at road level is the old stone wall running parallel to the pavement at the front of the site. In appendix E of the detailed site assessment carried out by B&NES it is stated that "Works would be required to make the site suitable for residential use, including the demolition of the existing building and the boundary wall to the front of the site." Not only would the demolition on the old stone wall fronting the site be damaging to the character of the conservation area, but it would also effectively remove the only existing feature of the site which screens it from the road and from the neighbouring houses. Given the narrow width of the site and the poor access from the road, it is likely that the majority of the front of the site will be open for access thus leaving little scope for sympathetic screening. In addition, given that the majority of the neighbouring houses have views of the site from a high level, including loft conversions, no amount of "sensitive pitch design" of screening would give the gypsy and traveller residence the level of privacy required. Neither will the screening be able to obscure the view of caravans/trailers, which will be alien within the surrounding setting and thus damaging to the character of the area.

The Preferred Options paper also states that "Access to the site may require works to improve visibility." Given the congested nature of the road and the existing on street parking, it is likely that in order to provide the necessary levels of visibility in order that the site can be entered and exited safely, it may be necessary to restrict the level of existing residential parking at the front of the site. This will have a significant effect of the amount of on street parking available for local residents and will exasperate the existing parking issue on Bath Old Road.

Finally, it is stated in the Preferred Options paper that "[The sites] reuse as a permanent Gypsy site would make efficient use of previously developed land." and that "The development of this site would meet a need for a small residential (permanent) site." Given the narrow width of the proposed site and the larger than average size of the vehicles which may require regular access, I would presume that it will be necessary to allot a significant proportion of the site, along the majority of its length, for access and turning. As such, I do not feel that such a development would be an efficient use of the land.

Another important issue that should be considered when reviewing the proposed development is that of road access and safety. Bath Old Road is already a congested street with cars parked on both sides of the road on a 24-hour basis, leaving only a narrow carriageway for traffic to pass. The road is also used as a 'rat-run' in the mornings and evenings as motorist attempt to avoid traffic on New Bath Road. Policy CP 11 of The Draft Core Strategy requires when assessing the suitability of travellers sites that "satisfactory means of access can be provided and the existing highway network is adequate to service the site." It is my opinion that this criteria is in no way met by the proposed Bath Old Road site. Currently it would be very difficult to drive a car towing a trailer from one end of the road to the other and would be practically impossible to manoeuvre the same vehicle onto the site based on the current site access and on-street parking. Visibility is also very limited when pulling onto the road and this is a serious safety concern. In order to allow realistic access and room to manoeuvre larger vehicles in and out of the proposed site, with acceptable levels of visibility, significant parking restrictions would be required in the vicinity of the site and this would have a significant impact on all of the existing local residents on a road that is already over congested with parked cars. It should be considered that a proposed housing development on the land neighbouring the site was rejected on planning grounds in part due to parking issues.

In addition to the above issues, the site is overlooked by all of the immediately surrounding houses, many of which (including mine) have loft conversions offering views of the site from a height. Therefore, not only will the site detract from the character of the area visible to all neighbouring properties, but the site will also not provide the level of privacy that the settling gypsy/traveller community would be entitled to.

I would also like to add that I believe the format of this response form and the questions asked within are not fit for purpose. There seems to have been little consideration of how the form will be interpreted and completed by local residents such as myself and seems to meet only the councils requirements. There is no supporting information as to how the form should be completed the questions asked within are ambiguous to varying degrees. Many of the comments I have included within my response could equally have been included within different sections of the form and still have been relevant to the heading of that section.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3484 / 1 Name: Ms Mary Evans Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

My issues are parking access and also school intake.

Respondent: 3485 / 1 Name: Mr Robert Pawley Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.
The site assessment report is biased in favour of Gypsies and Travellers with no mention of objectives/criteria for local residents.
Also the scoring is wrong of some of the objectives.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO.

Do you have any other general comments on the Preferred Options paper?

Sort out the traffic/speed of Old Bath Road before considering this site for any future development.

Respondent: 3486 / 1 Name: Ms Audrey Holland Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I think the site at the Infants School is wholly unsuitable and on a busy road, that is difficult at the best of times. The site is too small and from evidence of travellers parked on the disused railway track, the area will become overcrowded.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I do not agree, it should be removed from the list and stop wasting our hard earned money on a site that is not appropriate.

Do you have any other general comments on the Preferred Options paper?

Please consider sites that are more open and appropriate. Radstock suffers terribly from traffic congestion and overcrowding in certain areas and this would add to the congestion. If this is the only site available, I am concerned about the criteria used for the selection.

Respondent: 3512 / 1 Name: Ms Thelma Doughty Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There is a big traffic problem in Bath Old Road and Mendip view as this road is being used as a rat run to beat the traffic in New Bath Road, numerous people have contacted BANES and the police to no avail. Access is extremely difficult, to even get out of your car is taking your life into your own hands at times To put a traveller site in a residential area with no access on to a busy road is just indefensible, visibility is nil and accidents between cars is already a common occurrence, one day a person will be killed.

Radstock is a conservation area and should be preserved, not decimated.

There is some controversy as to who owns this land and may still be owned by Earl Waldergrave,

It is yards from homes and gardens.

The value of peoples' homes will be depreciated.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3523 / 1 Name: Mr Ken Sutton Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Our informed understanding of the possible sites is in respect of that being considered on the former Radstock Infant School Canteen on Old Bath Road, Radstock.

We consider that use of that site is inappropriate for the following reasons, which for simplicity at this point will be related to the Detailed Site Assessment Table (DSAT) for the site as shown in Appendix 5 of the Preferred Options within the Site Allocations Development Plan Document (SADPD).

SITE AND SURROUNDING AREAS INFORMATION:

1)The site is described as being 0.05 hectares. What is not described is the shape of the site, it is a long narrow strip of land and, because of that, will not allow for the stated BANES requirement given in paragraph 6.2 c) of the on the Policy and Delivery Options (P&DO) of the Detailed Site Assessment Report (DSAR). That requirement is set down as the site being "large enough to allow for adequate space for on-site facilities and amenity, parking and manoeuvring, as well as any commercial activity if required". In addition to those space requirements there is the further need for adequate roadway access, fire boundary needs and open-air play and relaxation areas.

2)Paragraph 4.4 of the DSAR states that a figure of 500 square metres has been used as a rough guide to a single pitch size including the above plus landscaping. This measurement equates to the 0.05 hectares which is shown as the size of the Bath Old Road site and is quite inconsistent with the recommendation that it is suitable for 2 pitches, indeed the shape of the plot makes it very difficult to imagine that it suitable for even one.

3)The DSAT correctly states that that the site is within the housing development area of Radstock. A 2 pitch Travellers Site is generally accepted as requiring the same amount of land as 5 new houses. Those houses are needed in Radstock which is short of affordable housing, satisfying that need is a much preferred option for the site. The Travellers should be sited outside this housing development area.

4)The DSAT states that the site benefits from good access to local services and local facilities and is not within the Green Belt. Whilst the local Primary School is within walking distance it is already oversubscribed and in the very next sentence in the DSAT BANES own Childrens Services are shown as saying " the ability to obtain a local primary school place is more likely to be difficult than in other locations". Because of the very hilly nature of the surrounding area, and the absence of public transport, other local services and facilities including secondary schools are difficult to access by foot, cycle and public transport which is the criteria for access within the Council's Draft Core Strategy (paragraph 6.2 a0 of the DSAR).

5)The site is described as not being within a Green Belt although later in the DSAT it is correctly described as being with a Conservation Area. There is advice that Travellers Sites should not be within a conservation area, indeed not within 1.5 miles of such an area. This restriction is supported by a following statement in the DSAT that "In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on the character would therefore be unacceptable". That is supported by the restriction in the deeds to our property, we are householders adjacent to the site. The deeds include that the owner shall "not use or permit to be used any parking space or driveway for any purpose other than the parking of a private vehicle not exceeding 8cwt carrying capacity" and "Not to keep or park on the Property any caravan trailer or sailing or motor vessel"

6)The DSAT then goes on to state that because the site is in a "Conservation Area and in a residential area makes the need for site screening important in minimising visual intrusion and preserving resident amenity and privacy." Current screening is on one side only and is provided by hedging, whilst that presently provides visual protection it is not necessarily permanent and does not provide against loss of amenity by noise, more permanent and effective screening would be

required along that side as well as the others. Screening of/from houses opposite the site will be impossible in practical terms because those houses are raised above the road and look down into the site.

HIGHWAYS:

1)The DSAT correctly says that “Off-street parking would be an important part of site design as parking is constrained in this location” and “Access on to the site may require works to make safe to account of the need for visibility.” Both statements are true but massively understated. Currently on-street parking adjacent to the site causes great problems to traffic flows particularly at peak times requiring patience from drivers which is not always apparent. The parking is by residents who have nowhere else to put their cars and it is likely to increase. Access to the site would reduce the spaces currently available particularly since room would need to be cleared on both sides of the road to allow for the turning circles of the larger trailers and vehicles which would require access to the site. Resident amenity would undoubtedly suffer and road safety would be compromised.

POTENTIAL FOR DEVELOPMENT AND SUITABILITY:

1)The DSAT states that “the site is in a highly accessible location and is adjacent to existing residential properties.” The statement that the site is “highly accessible” is surprising given the problems of congestion on the road, difficult access on foot or by cycle and the absence of public transport, all of which is requirements of a good site within the Council’s own strategy and dealt with above.

2)The concluding paragraph “The development of this site would meet an identified need for a small residential site. This would be suitable for an individual family not wishing to live within a larger area. The screening already in place provides the site with privacy while allowing for integration into the surrounding community.” contradicts many of the points and arguments made within BANES own report. It can only reflect a biased or uninformed rather than a seriously considered assessment.

AVAILABILTY AND ACHIEVABILITY:

1)The DSAT states that “Works would be required to make the site acceptable for residential use, including demolition of ... The boundary wall to the front of the site..” These works will have to be carried within the constraints of the site being within a conservation area. The demolition of the well established stone wall would require wide approval.

SITE CAPACITY:

1)The assessment of capacity is made without considering the shape of the site or in the context of difficult access and manoeuvrability, the need for screening and the requirement of the amenity use by the residents. The conclusion is obviously on a simplistic arithmetical basis ignoring the practicalities of the situation. Traveller families sharing the 2 pitches would find themselves cramped for space and with a resultantly difficult lifestyle.

RECOMMENDATION:

1)The recommendation that the site be allocated for a maximum of 2 permanent residential pitches seems to be based on acreage criteria alone, it flies in the face of many other assessments of BANES officers within the report and against the additional evidence presented above. Bearing in mind amenity, road access, site configuration, screening, local problems with parking and school access, plus being in a conservation area, the site is quite obviously inappropriate and unsuitable for use as a Travellers Site.

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

THE PREFERRED SITES

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Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

ANY OTHER COMMENTS

It is difficult to avoid straying away from the suggested focus of comment but we have attempted to do so, where we have strayed we have felt it to be necessary in the interests of completeness and ask for your indulgence.

1) The report does not give weight to the new national guidance for this area which was released in March 2012. Recognition of that guidance would have significantly altered the BANES approach e.g. in regard to local community involvement, including but not exclusively, local planning authorities.

2) Paragraph 8 of that March 2012 National Policy on Planning for Travellers Sites states that planners should work collaboratively with local planning authorities. It is understood that some local planning authorities did not respond when approached and that BANES then went ahead with proposals in those local authority areas anyway. It would be surprising if the collaboration requirement of the guidance did not anticipate a more robust attempt to work with local agencies than this attitude implies. If the required involvement of the relevant local planning authorities had been pursued then mistaken judgements and conclusions resulting from the report could have been avoided.

3) It is remiss that BANES Cabinet and Council did not seek the advice of its Planning, Transport and Environment Departments in this exercise. If it had then the report would have been more informed and at least some of the shortlisted sites would have been discarded. 4) Confusion of approach is also identified when so many sites within Green Belt and Conservation Areas are considered and recommended. Had guidance been

Respondent: 3543 / 1 Name:

Organisation: Bath Old Road Action Group

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes. The Radstock site is wholly inappropriate for a number of reasons:

The site is within the designated Radstock Conservation Area.

The site has major constraints with regards parking, access and highway visibility.

The site would have a negative impact on the residential amenity of local residents.

Alternative uses of the site including affordable housing and the potential for an overall sustainable development with the adjacent Infant School site have not been explored or taken into consideration. The process undertaken in terms of site selection is seriously flawed. Whilst the site may be available for development, it is certainly not suitable for the-proposed use. Nor do we believe it has been satisfactorily demonstrated by the BANES that it is an achievable site to meet the proposed end use. We provide evidence for this in the remainder of this consultation response, referring where appropriate to adopted and emerging policies.

In providing our response we have taken account the Development Plan Documents (DPD) as well as the following documents:

NPPF (2012) Planning for Traveller Sites (2012)

Designing Gypsy and Traveller Sites (2008)

B&NES Local Plan (2007)

B&NES Draft Core Strategy

B&NES Gypsy and Traveller Sites- Outline Landscape Assessment- March 2012 Rev. B

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B&NES Gypsy & Traveller Site Selection Exercise (2012)

B&NES Strategic Land Availability Assessment (SHLAA) - Report of Findings (2011)

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The opportunities identified for this site could be applied in ANY urban location i.e.: access to healthcare, education, shops and buses. If this assessment alone or by significant weight is used as the criteria for site selection then The Royal Crescent in Bath also scores very highly/

The constraints that B&NES have identified for this site far outweigh opportunities. It is very doubtful if the site would actually be granted planning permission, particularly having regard to adopted policies in the BANES Local Plan, National Guidance and Policy CP11 in the emerging Core Strategy.

It is considered unlikely that B&NES could successfully defend a legal challenge on either the process of site selection or the selection of this site.

It is considered unlikely that the selection of this site would pass examination by the Secretary of State if put forward to formal allocation.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. The site is unsuitable, not sustainable and would be very unlikely to receive planning permission. The use of the site as proposed would not be deliverable as it would not be possible to provide financial viability when seeking to overcome the constraints of access, highway visibility, parking and loss of public amenity. It is not possible to develop a Gypsy and Traveller site on this particular site whilst fulfilling the requirements of preserving and enhancing the character and appearance of the Conservation Area.

The sites at Lower Bristol Road, Twerton and Newbridge would both appear to be suitable and could be taken forward to formal allocation. In the case of the former it should follow formal consultation on removal from Greenbelt rather than be on the basis of 'very special circumstances' which would not be supported by evidence or the process undertaken.

It is understood that other sites may have also been identified and could help meet the potential pitch provision; however, we have some doubts as to the needs assessment in the West of England GTAA 2007 are either sufficiently current or robust enough to meet the criteria set out in the NPPF.

It is not entirely clear whether the pitch provision actually addresses the issues of the demographic identified in the GTAA as residing in the B&NES district.

Due to this, we are not entirely clear that the figures for pitch provision are correct. Perhaps none of the sites should be taken forward to formal allocation until a new 'needs assessment' update has taken place in conjunction with neighbouring authorities?

We have some concerns as to the extent of consultation with both the settled and Traveller communities, noting that the recent National guidance specifically refers to a need for early and effective community engagement.....As an example, no assessment has been undertaken of Boat Travellers who live on the Kennet & Avon and could also be seen to have a housing need. Perhaps this group could be allocated berths within a marina therefore giving them access to healthcare, education and a safe and secure place to live?

Do you have any other general comments on the Preferred Options paper?

The Bath Old Road exists as part of the wider Radstock Conservation Area which was designated in 1999.

The School site itself has been disused since 2005 and the buildings left derelict by B&NES.

It is acknowledged that the current buildings on the site, constructed sometime around the Second World War, have little architectural significance; however, it is widely felt that the development of a traveller site in this location would not be either sympathetic or enhance this important historical streetscape.

Why is Radstock so important?

The discovery of coal in 1763 led to the development of Radstock as the centre of coal mining activity in north Somerset until the 1950's. [2.3.2] (Conservation Area Assessment for Radstock)

The terraces of homes erected by the colliery owners to house miners and their families are exceptional in terms of design and their historical and architectural significance. Although 'none of the terraces are listed, their contribution to the town is unparalleled in their exceptional quality and character. They are not typical of the cramped industrial town, but built on the edge of established agricultural settlements, each with their own privies and extensive allotment gardens.' [3.3.1] (Conservation Area Assessment for Radstock)

Indeed, the Conservation Area Assessment carried out by B&NES Council in March 1999 recognises this importance and states:

'Radstock is one of the best preserved coal mining towns in England and unlike its midland and northern counterparts it still retains many important colliery features. It is a rare example of an early industrial/landscape where small-scale mining existed in a rural community and has left an important local legacy.' [3.1.1] (Conservation Area Assessment for Radstock)

However, the Conservation Area Designation didn't just assess the town centre but also recognises the historic significance of those terraced miners homes and states,

'The boundary includes these unlisted terraces and others on each side of Bath Old Road with their associated gardens, all of which are fundamental to the mining legacy of the Somerset Coalfield. '[4.6.2] (Conservation Area Assessment for Radstock

Bath Old Road is specifically mentioned in the Conservation Area Designation 1999

What does Conservation Area Designation mean for Bath Old Road, Radstock?

The primary legislation in place to preserve and enhance the historic environment is the Planning (Listed Buildings and Conservation Areas) Act 1990. Under section 69 of the Act, a duty is imposed on local planning authorities to designate as conservation areas any 'areas of special architectural or historic interest, 'the character or appearance of which it is desirable to preserve or enhance'. [1 .1.2] (Conservation Area Assessment for Radstock)

The emphasis within conservation areas is on ensuring that local character is strengthened, not diminished by change. The local community is not opposed to change and recognises that the existing buildings on the whole of the former Radstock Infants School site do little to enhance the area. However, replacing them with a traveller site would neither enhance nor be appropriate within the landscape I setting and certainly wouldn't strengthen the local character of the built environment.

In the Conservation Area Assessment 1999 for Radstock it clearly states that; Planning decisions should take account of the character and appearance of the conservation area. [1. 1.3] (Conservation Area Assessment for Radstock)

It also goes on to say that;

Enhancement and management in this area should seek to respect the historical linear form of development and the relationships between the open areas of landscape and the developed areas. (4.6.5) (Conservation Area Assessment for Radstock)

The significance of conservation area status is evidently recognised and this is set out as a recommendation when assessing traveller sites that: Sites should not be located within 1.5km of a Conservation Area. {0.9 4.34} (Statement of Consultation)

It is also noted that when making the site assessment for Bath Old Road B&NES states that; 'In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable.' (Appendix E: Detailed Site Assessment Tables) I would draw attention to Draft Core Strategy CP11 that traveller sites should;.. 'not harm the character and appearance of the surrounding area.'

How does the new National Planning Policy Framework relate to Conservation Areas?

Firstly, Conservation Areas are designated heritage assets, so great weight should be given to their conservation also [para. 132] (National Planning Policy Framework) There is a positive obligation to look for opportunities to enhance or better reveal the significance of a conservation area [para. 137] (National Planning Policy Framework Mar 2012) and that 'account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, their potential to contribute to sustainable communities and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.' [para 126 & 131] (National Planning Policy Framework) It is very difficult to see how placing a traveller site within Bath Old Road and the Radstock Conservation Area would meet the criteria set out above.

Secondly, it is noted that:

'Local planning authorities should identify and assess the particular significance to any heritage asset that may be affected by a proposal.' And that, 'They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.' [para. 129] (National Planning Policy Framework) There is no evidence to suggest any such assessment has taken place. It is believed that the Sustainability Appraisal Report (SA) of Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocation Development Plan Document was an attempt to undertake such an assessment. Indeed, in

Table 3.2 Summary of the sustainability issue identified for the Gypsy & Traveller Site Allocations DPD (p. 15) recognises Conservation Area status. However, in Table 4.1: Summary of the Significant and Secondary, Cumulative and Synergistic Effects of the Issues identified within the SA - NO mention is made of the sites conservation area status (p.28129). Instead, it states:

GT.4 Former Radstock Infant School canteen, Radstock

This site is one of the best performing of all sites assessed. Significant positive benefits are identified as against social, environmental and economic objectives due to the sites location within the urban area of Radstock, close to local services and facilities, its reuse of previously developed land, and the provision of a small scale site within an existing residential area.

The ability of site residents to access education and healthcare services is a particularly significant benefit of the site which would enable continued access into the long term. The only negative impacts arising from the use of this site for allocation are against access to work opportunities (Objective 5) due to the low availability of work opportunities in the area, and Objective 10, reducing pollution, due to the introduction of additional sources of pollution at this location. Mitigation and enhancement measures have been identified that would offset the impact of a number of these impacts.

Due to the significant number of positive impacts against the SA objectives, this site is recommended for allocation . . . (Sustainability Assessment) What is of some concern is that NO mention is made of Objective 8 - Protect and enhance the district's distinct historic, environmental and cultural assets. (Sustainability Assessment) Further, NO mention is made of the conservation area status in Appendix D- Full Assessment Matrices.

In fact, the only assessment and reference made of Objective 8 is made in the overall commentary.

All that could be said was that:

'the removal of the existing derelict building is likely to improve h (Sustainability Assessment)

Firstly, it is doubtful that simply demolishing the canteen, replacing it with a traveller site whilst still leaving the other derelict buildings in place would do anything to 'improve the townscape'. Secondly, It is difficult to see how a single sentence provides any assessment as required in Para.129 (National Planning Policy Framework) or Para. 132 where it states that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to that asset's conservation.'

(National Planning Policy Framework)

This leads us to believe that the Sustainability Assessment has ignored the significance of the Conservation Area status and is therefore flawed. Indeed, in the initial scoring matrix used to identify potential sites, whilst recognising that the site was in a Conservation Area, there was no score given for such status which again ignores the importance of this important heritage asset.

Furthermore, there is some concern that the demolition of the existing wall fronting the canteen site and used to form the boundary to the former gardens on the site would be a significant loss to the streetscape. It would appear that this wall would need to be demolished to provide access and egress to the site

Again we would draw attention to statement 6.3 of the B&NES Gypsy and Traveller Sites Outline Landscape Assessment-March 2012 Rev. B which was acquired under a Freedom of Information Act request and was not part of the DPD. It clearly advises that: We would also draw your attention to a 'confidential' email between Meghan Rossiiter (Senior Planning Officer) and David Holmes (Team Leader- Highway Development Control) dated 20th March 2012 via a Freedom of Information Act request that clearly states: 19 Bath Old Road- Access to the site is poor. There is residential development to the south, with parked cars on either side of the highway in part, and single track road to the north. This affords poor passing opportunity which would be exacerbated by the need for larger vehicles or vehicles towing to use his route. We also believe that the width of the site also constrains the development as a Gypsy/traveller site.

In reviewing the Designing Gypsy and Traveller Sites- A Good Practice Guide published by the DCLG in May 2008 we noted the following criteria:

- 4.27 Access roads on site should be 3.17m wide.
- 4.30 Roads should be constructed to an adoptable standard.
- 4.13 A 3m boundary around the perimeter to act as a fire break.
- 4.47 Density no less than 6m from another caravan/trailer

We are also aware that a pitch should have 2 parking spaces each and that each individual car parking space should measure 2.4m x 4.8m. 4.44

4.43 Recommends the use of Soft Landscaping on the site and finally 4.17 recommends that enough space should be provided to permit easy manoeuvrability of residents own living accommodation both on to the site and subsequently onto the pitch. With the use of mobile home type accommodation up to 25m in length it is difficult to see how this would be achieved. Even with average size trailers of 15m this may prove difficult.

When viewing the plan outlined in the Preferred Options document, this thin strip of land, would need to accommodate all of the above PLUS:

- Amenity Building
- A touring Caravan (per pitch)
- Drying space for clothes
- Lockable shed
- Small Garden

As well as providing adequate screening. Screening is an important consideration for this site and should be noted. (We address this issue when assessing impact on resident's amenity value on the following page.)

However, despite the inability to actually fit all these requirements onto the land we are also concerned that the recommendation for 2 pitches on the site would lead to overcrowding. B&NES own figures of 500m² as a single pitch size presents problems when the whole site is only 0.05 Hectares (500m²)- So the site can actually only accommodate 1 pitch, not 2.

Respondent: 3543 / 1 Name:

Organisation: Bath Old Road Action Group

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The site has major constraints with regards parking, access and highway visibility.

The site would have a negative impact on the residential amenity of local residents.

Alternative uses of the site including affordable housing and the potential for an overall sustainable development with the adjacent Infant School site have not been explored or taken into consideration.

The process undertaken in terms of site selection is seriously flawed. Whilst the site may be available for development, it is certainly not suitable for the proposed use, nor do we believe it has been satisfactorily demonstrated by the BANES that it is an achievable site to meet the proposed end use. We provide evidence for this in the remainder of this consultation response, referring where appropriate to adopted and emerging policies.

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Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The opportunities identified for this site could be applied in ANY urban location i.e.: access to healthcare, education, shops and buses. If this assessment alone or by significant weight is used as the criteria for site selection then The Royal Crescent in Bath also scores very highly!

The constraints that B&NES have identified for this site far outweigh opportunities. It is very doubtful if the site would actually be granted planning permission, particularly having regard to adopted policies in the BANES Local Plan, National Guidance and Policy CP11 in the emerging Core Strategy.

It is considered unlikely that B&NES could successfully defend a legal challenge on either the process of site selection or the selection of this site.

It is considered unlikely that the selection of this site would pass examination by the Secretary of State if put forward to formal allocation.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. The site is unsuitable, not sustainable and would be very unlikely to receive planning permission. The use of the site as proposed would not be deliverable as it would not be possible to provide financial viability when seeking to overcome the constraints of access, highway visibility, parking and loss of public amenity. It is not possible to develop a Gypsy and Traveller site on this particular site whilst fulfilling the requirements of preserving and enhancing the character and appearance of the Conservation Area.

The sites at Lower Bristol Road, Twerton and Newbridge would both appear to be suitable and could be taken forward to formal allocation. In the case of the former it should follow formal consultation on removal from Greenbelt rather than be on the basis of 'very special circumstances' which would not be supported by evidence or the process undertaken.

It is understood that other sites may have also been identified and could help meet the potential pitch provision; however, we have some doubts as to the needs assessment in the West of England GTAA 2007 are either sufficiently current or robust enough to meet the criteria set out in the NPPF.

It is not entirely clear whether the pitch provision actually addresses the issues of the demographic identified in the GTAA as residing in the B&NES district.

Due to this, we are not entirely clear that the figures for pitch provision are correct. Perhaps none of the sites should be taken forward to formal allocation until a new 'needs assessment' update has taken place in conjunction with neighbouring authorities?

We have some concerns as to the extent of consultation with both the settled and Traveller communities, noting that the recent National guidance specifically refers to a need for early and effective community engagement. As an example, no assessment has been undertaken of Boat Travellers who live on the Kennet & Avon and could also be seen to have a housing need. Perhaps this group could be allocated berths within a marina therefore giving them access to healthcare, education and a safe and secure place to live?

Do you have any other general comments on the Preferred Options paper?

The Bath Old Road exists as part of the wider Radstock Conservation Area which was designated in 1999.

The School site itself has been disused since 2005 and the buildings left derelict by B&NES.

It is acknowledged that the current buildings on the site, constructed sometime around the Second World War, have little architectural significance; however, it is widely felt that the development of a traveller site in this location would not be either sympathetic or enhance this important historical streetscape.

Why is Radstock so important?

The discovery of coal in 1763 led to the development of Radstock as the centre of coal mining activity in north Somerset until the 1950's. [2.3.2] (Conservation Area Assessment for Radstock)

The terraces of homes erected by the colliery owners to house miners and their families are exceptional in terms of design and their historical and architectural significance. Although 'none of the terraces are listed, their contribution to the town is unparalleled in their exceptional quality and character. They are not typical of the cramped industrial town, but built on the edge of established agricultural settlements, each with their own privies and extensive allotment gardens.' [3.3.1] (Conservation Area Assessment for Radstock)

Indeed, the Conservation Area Assessment carried out by B&NES Council in March 1999 recognises this importance and states:

'Radstock is one of the best preserved coal mining towns in England and unlike its midland and northern counterparts it still retains many important colliery features. It is a rare example of an early industrial landscape where small-scale mining existed in a rural community and has left an important local legacy.' [3.1.1] (Conservation Area Assessment for Radstock)

However, the Conservation Area Designation didn't just assess the town centre but also recognises the historic significance of those terraced miners homes and states,

'The boundary includes these unlisted terraces and others on each side of Bath Old Road with their associated gardens, all of which are fundamental to the mining legacy of the Somerset Coalfield.' [4.6.2] (Conservation Area Assessment for Radstock)

Bath Old Road is specifically mentioned in the Conservation Area Designation 1999.

What does Conservation Area Designation mean for Bath Old Road, Radstock?

The primary legislation in place to preserve and enhance the historic environment is the Planning (Listed Buildings and Conservation Areas) Act 1990. Under section 69 of the Act, a duty is imposed on local planning authorities to designate as conservation areas any 'areas of special architectural or historic interest, 'the character or appearance of which it is desirable to preserve or enhance'. [1.1.2] (Conservation Area Assessment for Radstock)

The emphasis within conservation areas is on ensuring that local character is strengthened, not diminished by change.

The local community is not opposed to change and recognises that the existing buildings on the whole of the former Radstock Infants School site do little to enhance the area. However, replacing them with a traveller site would neither enhance nor be appropriate within the landscape / setting and certainly wouldn't strengthen the local character of the built environment.

In the Conservation Area Assessment 1999 for Radstock it clearly states that;

Planning decisions should take account of the character and appearance of the conservation area. [1.1.3] (Conservation Area Assessment for Radstock)

It also goes on to say that;

Enhancement and management in this area should seek to respect the historical linear form of development and the relationships between the open areas of landscape and the developed areas. (4.6.5) (Conservation Area Assessment for Radstock)

The significance of conservation area status is evidently recognised and this is set out as a recommendation when assessing traveller sites that:

Sites should not be located within 1.5km of a Conservation Area. {Q.9 4.34 } (Statement of Consultation)

It is also noted that when making the site assessment for Bath Old Road B&NES states that;

'In terms of landscape character, mobile homes or caravans in this location would be viewed as alien in this residential location and that the impact on character would therefore be unacceptable.' (Appendix E: Detailed Site Assessment Tables)

I would draw attention to Draft Core Strategy CP11 that traveller sites should;

..'not harm the character and appearance of the surrounding area.'

How does the new National Planning Policy Framework relate to Conservation Areas?

Firstly, Conservation Areas are designated heritage assets, so great weight should be given to their conservation also [para. 132] (National Planning Policy Framework)

There is a positive obligation to look for opportunities to enhance or better reveal the significance of a conservation area [para. 137] (National Planning Policy Framework – Mar 2012)

and that

'account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, their potential to contribute to sustainable communities and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.' [para 126 & 131] (National Planning Policy Framework)

It is very difficult to see how placing a traveller site within Bath Old Road and the Radstock Conservation Area would meet the criteria set out above.

Secondly, it is noted that:

'Local planning authorities should identify and assess the particular significance to any heritage asset that may be affected by a proposal.' And that, 'They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'

[para. 129] (National Planning Policy Framework)

There is no evidence to suggest any such assessment has taken place.

It is believed that the Sustainability Appraisal Report (SA) of Bath and North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocation Development Plan Document was an attempt to undertake such an assessment. Indeed, in Table 3.2 Summary of the sustainability issue identified for the Gypsy & Traveller Site Allocations DPD (p.15) recognises Conservation Area status.

However, in Table 4.1: Summary of the Significant and Secondary, Cumulative and Synergistic Effects of the Issues identified within the SA - NO mention is made of the sites conservation area status (p.28/29).

Instead, it states:

GT.4 Former Radstock Infant School canteen, Radstock

This site is one of the best performing of all sites assessed.

Significant positive benefits are identified as against social, environmental and economic objectives due to the sites location within the urban area of Radstock, close to local services and facilities, its reuse of previously developed land, and the provision of a small scale site within an existing residential area.

The ability of site residents to access education and healthcare services is a particularly significant benefit of the site which would enable continued access into the long term.

The only negative impacts arising from the use of this site for allocation are against access to work opportunities (Objective 5) due to the low availability of work opportunities in the area, and Objective 10, reducing pollution, due to the introduction of additional sources of pollution at this location.

Mitigation and enhancement measures have been identified that would offset the impact of a number of these impacts.

Due to the significant number of positive impacts against the SA objectives, this site is recommended for allocation. . (Sustainability Assessment)

What is of some concern is that NO mention is made of Objective 8 - Protect and enhance the district's distinct historic, environmental and cultural assets. (Sustainability Assessment)

Further, NO mention is made of the conservation area status in Appendix D – Full Assessment Matrices.

In fact, the only assessment and reference made of Objective 8 is made in the overall commentary.

All that could be said was that:

'the removal of the existing derelict building is likely to improve the townscape.' (Sustainability Assessment)

Firstly, it is doubtful that simply demolishing the canteen, replacing it with a traveller site whilst still leaving the other derelict buildings in place would do anything to 'improve the townscape'.

Secondly, It is difficult to see how a single sentence provides any assessment as required in Para.129 (National Planning Policy Framework) or Para. 132 where it states that

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to that asset's conservation.' (National Planning Policy Framework)

This leads us to believe that the Sustainability Assessment has ignored the significance of the Conservation Area status and is therefore flawed.

Indeed, in the initial scoring matrix used to identify potential sites, whilst recognising that the site was in a Conservation Area, there was no score given for such status which again ignores the importance of this important heritage asset.

Furthermore, there is some concern that the demolition of the existing wall fronting the canteen site and used to form the boundary to the former gardens on the site would be a significant loss to the streetscape.

It would appear that this wall would need to be demolished to provide access and egress to the site.

Again we would draw attention to statement 6.3 of the B&NES Gypsy and Traveller Sites – Outline Landscape Assessment – March 2012 Rev. B which was acquired under a Freedom of Information Act request and was not part of the DPD. It clearly advises that:

6.3 The importance of the stone wall to the frontage should not be underestimated and there is a need to respect and reflect the existing building line.

This advice has been ignored, however the same document also goes on to state that:

6.4 If this site were to be developed on its own, then the need for vehicle access would remove most of the frontage wall which would generally be unacceptable.

Bath Old Road Action Group is somewhat bemused that all recommendations and advice from its own Planning Department has been ignored.

HIGHWAYS, ACCESS AND SITE CONSTRAINTS:

To date it appears that no Highways Assessment has taken place for the site. We would draw attention to Draft Core Strategy CP11 which states that when assessing suitability for traveller sites that there is a requirement that:

'satisfactory means of access can be provided and the existing highway network is adequate to service the site.'

There are significant constraints in terms of access onto the site due to existing resident parking on both sides of the street allowing for a single car to pass along this stretch of road.

It is doubtful that a large trailer would be able to pass along the road let alone turn into the proposed site.

Current resident parking would have a negative impact on visibility up and down the road for anyone attempting to leave the proposed site.

Whilst this appears to have a major safety implication our advice would suggest that remedial work to make egress safe would potentially require a 1.4m x 43m visibility splay. This would remove existing resident parking and add further pressure onto an already congested street. Indeed, this is recognised in B&NES Detailed Site Assessment which states that. 'Access on the site may require works to make safe to take account of the need for visibility.'

The road is used as a 'rat run' between the A367 and Radstock town centre and attracts significant volumes of additional traffic during peak hours. Many of the vehicles using this short cut exceed the 30mph speed limit due to the gradient and it is envisaged that further traffic calming measures may be required to make this road safe for residents accessing and egressing the proposed site, again putting further pressure on this residential street.

We would also draw your attention to a 'confidential' email between Meghan Rossiiter (Senior Planning Officer) and David Holmes (Team Leader – Highway Development Control) dated 20th March 2012 via a Freedom of Information Act request that clearly states:

19 Bath Old Road – Access to the site is poor. There is residential development to the south, with parked cars on either side of the highway in part, and single track road to the north. This affords poor passing opportunity which would be exacerbated by the need for larger vehicles or vehicles towing to use his route.

We also believe that the width of the site also constrains the development as a Gypsy/Traveller site.

In reviewing the Designing Gypsy and Traveller Sites – A Good Practice Guide published by the DCLG in May 2008 we noted the following criteria:

- 4.27 Access roads on site should be 3.17m wide.
- 4.30 Roads should be constructed to an adoptable standard.
- 4.13 A 3m boundary around the perimeter to act as a fire break.
- 4.47 Density no less than 6m from another caravan/trailer

We are also aware that a pitch should have 2 parking spaces each and that each individual car parking space should measure 2.4m x 4.8m. 4.44

4.43 Recommends the use of Soft Landscaping on the site and finally 4.17 recommends that enough space should be provided to permit easy manoeuvrability of residents own living accommodation both on to the site and subsequently onto the pitch. With the use of mobile home type accommodation up to 25m in length it is difficult to see how this would be achieved. Even with average size trailers of 15m this may prove difficult.

When viewing the plan outlined in the Preferred Options document, this thin strip of land, would need to accommodate all of the above PLUS:

- Amenity Building,
- A touring Caravan (per pitch)
- Drying space for clothes
- Lockable shed
- Small Garden

As well as providing adequate screening. Screening is an important consideration for this site and should be noted. (We address this issue when assessing impact on resident's amenity value on the following page.)

However, despite the inability to actually fit all these requirements onto the land we are also concerned that the recommendation for 2 pitches on the site would lead to overcrowding.

B&NES own figures of 500m² as a single pitch size presents problems when the whole site is only 0.05 Hectares (500m²) – So the site can actually only accommodate 1 pitch, not 2.

We draw the council's attention to Core Strategy Policy CP11 which states the criteria that:

'The site is large enough to allow for adequate space for on-site facilities and amenity, parking and manoeuvring as well as any commercial activity if required.'

Given all of the information available and our rudimentary assessment it is clear that this criterion cannot be met and that an inadequate assessment of this site's potential use has been carried out.

How will the proposed site affect residential amenity?

No robust assessment has taken place as to the impact on residential amenity of either the existing residents or proposed occupiers of the Gypsy and Traveller site.

We draw attention to Core Strategy Policy CP11 which states:

Use of the site must have no harmful impact on the amenities of neighbouring occupiers

6.5 of the Outline Landscape Assessment – March 2012 Rev.B states:

'If the scheme were to proceed then a robust and substantial scheme of planting to each side of the longer side boundaries would be required together with a management scheme and retention of the rear boundary vegetation.

This planting would undoubtedly impact the residents of No. 19 Bath Old Road and would have to be extremely high to inhibit views into the proposed site. The vegetation (Laurel hedge) to the rear of the site is owned by the residents of properties in Bristol Road and would therefore not be able to be effectively managed. No mention is made of the views into the site by residents on Bath Old Road who front the site.

Further, it is not possible to assess the impact on residential amenity to any potential development on the rest of the school site. Presumably any design will not be able to have second storey windows on the south side of any building sited

adjacent the boundary.

Even if we ignore existing resident's amenity, Travellers themselves will be overlooked by the existing settled community. Due to the physical constraints of the site there will be no opportunity to ensure appropriate levels of privacy for residents on the proposed site are provided.

Alternative Use of Site

We draw the councils attention to the comments made by B&NES Property Services in the document Gypsy & Traveller Site Selection Exercise 2012 prepared by Property Services in advance of the Planning Department's district wide 'Call for Sites' for consideration of potential Gypsy & Traveller sites to be included in the subsequent consultation.

It recommends that the canteen site would be:

Prudent to hold/dispose with the wider school site

However this advice has been ignored.

We refer to 6.6 of the Outline Landscape Assessment – March 2012 Rev.B which states that:

We consider that a well designed residential terrace would be more appropriate

And 6.4 that states:

We think it important that the notion of developing both sites as a whole is considered.

Again, this was ignored.

As has been the Strategic Land Availability Assessment (SHLAA) – Report of Findings-May 2011- Appendix 1 dii that identifies the whole school site as having potential for 14 dwellings.

It is widely felt that this would be a more appropriate development in a residential area when viewed alongside the designated conservation area status.

To conclude, it is our position that the development of the site as proposed would fail to be in accordance with criteria b, c and e of Policy HG16 and criteria b, c, d and f of emerging Policy CP11.

Given all the arguments presented above, Bath Old Road Action Group feel that the proposals contained in the Gypsies, Travellers and Travelling Showpeople DPD for site GT.4 is deeply flawed. The evidence base is out of date and the process of allocation is unfounded, in particular the many constraints and limitations of sites have not been fully explored.

We firmly believe the development of the site as proposed is inappropriate, it remains to be established whether development is actually achievable, but not withstanding this the site is fundamentally unsuitable and as such should be removed from the Preferred Options document forthwith.

Respondent: 3558 / 1 Name: Mr Les Robson Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes I have information that I believe would make the Radstock site totally unsuitable:

The information given in the preferred options document is incorrect. You say the site may require work to improve visibility. In fact the stone wall facing the road will definitely need to be demolished to achieve the visibility needed to access the site. Screening has to be provided on the site. You cant use a neighbours property as screening.

The intended site for caravans has never been developed, it has always been a garden. The developed part is the canteen which would be demolished for access to the undeveloped part.

My investigations tell me the local schools are over subscribed and recently a pupil was refused a place in Writhlington School because of this reason. Your own assessment tells you the siting of caravans would be alien and unacceptable.

Previous developments have had planning refused on this basis. The statement that the site is in a highly accessible location is incorrect. An email from highways to your consultant confirms this. Major works to the entrance of the site would be required, taking much needed parking spaces from residents. As many as 8-10 parking spaces would be lost because of double yellow lines needed to make the entrance to the site safe. You do realise the residents of bath old road have no off road parking.

There are many constraints against the development of a travellers site in a conservation area, none of which are

mentioned in any of your reports. These are mentioned in the official letter to you from the Bath Old Road Action Group. Therefore I will not duplicate them in this letter.

It seems that a lot of information given by BANES is misleading at best and some information has been withheld, only being given under the duress of the Freedom of Information Act 2000.

Travellers and Gypsies deserve a more professional approach to something that seriously effects their lives. The existing document looks to have been put together in a hurried manner, using a matrix which is seriously flawed, taking travellers to look at sites that have little chance of materialising does BANES no credit at all, and unduly raises the hopes of those people we are trying to help. I sincerely hope that some of the alternative site put forward will come to fruition and provide accomidation acceptable to the travelling community.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. I find the assessment very contradictory and the conclusion does not reflect the content of the assessment.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

The information in the paper is biased and some of it incorrect.

Respondent: 3563 / 1 Name: Mr David Marchant Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I do not agree because I think BaNES desire to pursue Stanton Wick Old Colliery Site is misguided as it does not satisfy legislated planning criteria.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree.

Do you have any other general comments on the Preferred Options paper?

The Stanton Wick site is in the Green Belt and the proposed site is an inappropriate development in the Green Belt.

The proposed Old Colliery development is very large and would overwhelm the existing community.

The site is immediately adjacent to, and overlooked by, one residence and is very close to another.

There is a long history of planning application refusals, both at the Old Colliery and the adjacent site (Filer's Coaches). The only permission granted in recent years is for a single dwelling. Inappropriate development in the Green Belt has been cited as reason for refusal.

Wick Lane, Stanton Wick Lane and the junctions cannot support any real increase in traffic volume without substantial road widening and junction alteration. BaNES have cited traffic volume in previous refusals.

There is no safe walking route along the roads either to Pensford or Stanton Drew schools. The public footpath from the side of the Winding House to the A37 is not safe, even in summer.

There is no public transport within safe walking distance.

There is only one local shop in Pensford which is very small and only stocks essentials which are insufficient for a family's food shopping requirements. In addition there is no safe walking route to the shop from the proposed site.

The nearest doctor's surgery is approximately 5 miles away and there is no public transport.

The water supply to Stanton Wick is very unreliable and is at capacity for the infrastructure. There is no mains sewerage in Stanton Wick and septic tanks are not suitable for a development of the proposed size.

The land at the Old Colliery Site is contaminated and would be very expensive to remedy causing huge disruption including heavy vehicles driving along Wick Lane.

The site is dangerous due to several old mineshafts which could collapse at any time.

There is limited employment in the area.

The Old Colliery is a Site of Nature Conservation Interest providing habitat for many important species and is very close to the Pensford Conservation Area.

Respondent: 3590 / 1 Name: Mrs Corrina Fowler Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No - There are already parking difficulties for local residents of Bath Old Raod given that many don't have vehicular access to the rear of their homes. This means they have no option but to park on the highway. Kerb sides are often full to capacity.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not. This site should never have been proposed given that it is located in a designated 'conservation area'!

Do you have any other general comments on the Preferred Options paper?

The council's proposal are not in line with the governments NPPF.

This site has already been proposed as a potential site for affordable house, allowing young people and single parents the opportunity to get on the property ladder and remain in the area.

The proposals will also, undoubtedly, have a negative impact on the amenity value of local residents property, something of particular concern to myself and my own circumstances.

Respondent: 3590 / 2 Name: Mrs Corrina Fowler Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I wish to oppose the proposal of a Travellers' Site on the above-mentioned former school land.

Not only is it in a designated Conservation Area but I have concerns over the parking and access issues should the site go ahead. Bath Old Road is frequently full to capacity with vehicles, large and small, parked on both sides of the highway. This is due partly to lack of access for many residents to the rear of their homes and also to many households having more than one vehicle.

I also believe access to the proposed site as a base for Travellers' and their vehicles is inadequate. T

his site has also been proposed as a potential site for affordable housing; thus enabling local young people and single parents on a limited income the opportunity to purchase a home within the locality.

The Travellers' Site proposal will also undoubtedly have a negative impact on the amenity value of local residents' property; it is this very subject that especially concerns me due to my personal circumstances.

Following my divorce some years ago, I have now reached the point where I have to sale my property to enable my ex-husband to have his monetary share. Following the shock revelation of the proposed sites in the local newspapers which had a knock on effect with the sale of other properties within the area, I believe I will be unable to sale my property whilst this proposal is still being decided upon. The outcome of this will be once the cutoff date for my ex-husband to receive his share kicks in, a percentage will eat into my share as interest for every year I owe him the money. Given that my property will likely not sale due to the proposal of a Travellers' Site, will the Council reimburse me for this loss of money due to circumstance of their making? Also, will the Council compensate me for the loss of value in my property?

I need to receive maximum value for my property to enable me to re-house myself without, hopefully, turning to Social housing or rented accommodation. Having lived in the area for over 26 years and supporting the local community through using the local schools and businesses, it is distressing that my local Council has made a decision that was clearly unsuitable which will affect my financial stability and cause me a huge amount of stress!

I hope the Council makes the right decision and removes this site from their proposed list at the earliest opportunity to stop the unseen negative effect it is having on the residents within the locality.

Respondent: 3601 / 1 Name: Ms Carolyn Slater Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I am a resident of Radstock living in close proximity to the proposed site. I am aware of the circumstances and have read the proposals.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. the site is on a road where there are already traffic congestion and parking issues. Access in and out of the site is problematic and possibly unsafe.

This is a conservation area and, following the councils own criteria, should not have been considered.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. Further to the above points, there is still a query over who owns this land.

Current proposals are not in line with the governments NPPF,

Do you have any other general comments on the Preferred Options paper?

In terms of what is required for the benefit of Gypsy and Traveller sites this site seems to be totally unsuitable and not in their best interests, as it does not have good access. The site is not appropriate under BANES own guidelines. Other sites have been proposed as more suitable and should be considered. The traffic and parking problems are a major factor.

Respondent: 3607 / 1 Name: B Withers Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. Bath Old Road being a conservation area should not be under any consideration. The site is also unsuitable as used as a car park. The Bath Old Road site is also not suitable to more traffic as there is a blind bend at the top where the road also narrows.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. Proposed site is too close to existing properties, not good for people living theatre, Bath Old Road is used as a short cut if there are any delays in Radstock.

Do you have any other general comments on the Preferred Options paper?

Both sides of the road is used for parking (why not used the proposed site as a car park and get all the traffic off the road).

Respondent: 3609 / 1 Name: Ms Hazel Dunne Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

YES

Whilst the Preferred Options document does mention that "parking is constrained in this location", I don't think that this problem has been truly appreciated.

In the daytime, Bath Old Road is relatively deserted, but during the evening and overnight, both sides of the road are chocker-block with vehicles (domestic & commercial) and the idea of trying to incorporate a site entrance, plus parking and accessibility for travellers traffic may prove very difficult & dangerous.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with some of the Council's assessment, but feel that they have glossed over & minimised the constraints.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

I feel that the paper has been hastily put together & contains some inaccuracies & several misleading statements.

Respondent: 3615 / 1 Name: Mr P Cowles Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I do not agree with the council's assessment of a gypsy/traveller site at the infants school in Bath Old Road
My reasons are:

1) The site is inside a designated Conservation Area
 2) The site would not be able to be adequately screened from other residents
 3) The site is also not suitable for any commercial activities that would be operated by gypsy/travellers due to the close proximity of other residents, and the very poor access to the site i.e. traffic issues.
 4) The council had a planning application for the site (07/03795/FUL) to build 14 homes on it. This would be a far more appropriate use for this land and it would be in keeping with the conservation area.
 This land should also be developed for needed people in the Radstock area, not for gypsy/travellers

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree

Do you have any other general comments on the Preferred Options paper?

I would like to suggest that the Council look at siting a gypsy/traveller site at the end of the Park and Ride site at Odd Down. There is a considerable amount of land there. I accept that this land may not be owned by the council, but is a more appropriate site than the infants school in Bath Old Road. I would also say it met the council criteria. So if the council sold some of the proposed sites they could acquire this land.

Respondent: 3616 / 1 Name: WC Chivers Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No
 The car parking in this area is bad enough without making it worse.
 The access for the would take parking away.
 The old school should be used for primary children as it was before for parents which can't afford child minders (of which is too expensive for lots of parents). The play area used for parking cars

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

The place for Gypsy and Travellers next to the park and ride Odd Down of which they could gain access to the site from Combe Hay and not interfere with any one.

Respondent: 3617 / 1 Name: Mrs PR Ruddock Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No
 It should be used for Education like a nursery for parents who have to go to work to make ends meet but cannot afford these private child minders.
 Or children who are slow at learning and could do with extra help after all it was put there to help the poor.
 There are no way a caravan can turn to go into that property it is bad enough to try and park a car already if you live there.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO!

Do you have any other general comments on the Preferred Options paper?

There are plenty of spaces out in the country they can go. I always thought that was where they went if that's their way of life. Twerton seem to enjoy having them so perhaps that site could be made bigger.

Respondent: 3642 / 1 Name: Mr Brian Perrett Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The BANES Development Plan Document (DPD) includes the former Radstock School Canteen. In my view it is NOT a suitable site. The access is very difficult during the evenings and at week-ends. The inevitable overspill of Travellers onto the adjacent former Infants School land will be very difficult to control.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

The site is within a totally built-up residential area. It is overlooked on all sides and this could lead to contention and disputes between the permanent residents and the Travellers.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, I do not agree that use of this site should become a formal allocation. I have no vested financial interest in the site but many close-by residents are my friends and their lives will be made difficult.

Do you have any other general comments on the Preferred Options paper?

I am surprised that the site conforms to best practice for Travellers sites. Most often the Travelling community are self-employed. A location that permits close scrutiny of their chosen life-style is not something I would expect them to favour.

Respondent: 3646 / 1 Name: Mr Craig Smith Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes - Bath Old Road site

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. There are significant concerns around access to the site, concerns around the increased demand on the local infrastructure, and environmental concerns.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. The proposed site is unsuitable.

Access is already strained on Bath Old Road with vehicles parked in a continuous line on both sides, reducing visibility and safety. The road is already too small for the volume of traffic. Local school provision is already stretched, as is local health care, with one G.P. practice for the whole of Radstock.

Do you have any other general comments on the Preferred Options paper?

My understanding is that ...
 Radstock is a conservation area and Travellers' sites are not to be positioned in conservation areas.
 In addition (as an immediate neighbour of the site) I am aware of the likelihood of a bat colony - bats are seen regularly in my garden, as are badgers. A more rural, open site which has greater visibility and access to a quieter road network, and which is clearly not a potential habitat for wildlife, would be much preferable.

Respondent: 3648 / 1 Name: Mr W Parfitt Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

I do not agree with the Council's assessment of opportunities and constraints on the site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I do not agree that the potential pitch provision be taken forward as a formal allocation .

Do you have any other general comments on the Preferred Options paper?

The reason that I do not agree with sections (a)&(b) are; (1) As the site is proposed, it is in a conservation area and within the 1.5km exclusion boundary set out by B.A.N.E.S. (2) The proposed site is approximately 2.5 metres from an existing occupied residential dwelling. (3) the proposed site would be accessed from a busy, dangerous and congested road and would add further danger to motorists and pedestrians. (4) Static and mobile homes would contravene the strict planning requirements of B.A.N.E.S. (5) Although screening of the site has been suggested, this in my opinion would tend to alienate any resident of the proposed site. (6) It seems to any sensible person that to further add to the congestion and dangers already being encountered by residents of Bath Old Road, it would be very ill considered to put this site forward for a Gypsy, Traveller and Travelling Showpeople Site.

Respondent: 3675 / 1 Name: Mr Carlo matthews Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

We feel Old Bath Road is already a very busy road. There is only room for single traffic to travel through, peak travel times its used as a rat run for commuters a site here will only add to the chaos:-
 - Radstock (including Old Bath Road) is in a designated Conservation Area
 - Have an impact on the value of our property

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No we do not agree

Do you have any other general comments on the Preferred Options paper?

Respondent: 3677 / 1 Name: Ms Kim-Marie Edgell Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site selected at BATH OLD ROAD is neither suitable nor achievable and should not have been shortlisted. Very clearly the guidance of the new policy "Planning Policy for Travellers sites" and the guidance contained in the Policy Impact Assessment Paper have not been followed. Circulars 2006 and 2007 have been cancelled. Out dated GTAA information should not be used, proper local needs assessment are called for. Early local consultation is mandated, proper weighting of the impact on the settled community is required, not evident in the criteria and site selection matrix used.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I do not agree: The road access is not used suitable to service safely a permanent site of two pitches with all of the vehicles suggested in the guidance document and the likely business coming and goings of cars and large vehicles. Taken together with the daily 'rat run' traffic and the parking needs of settled resident community this would lead to traffic chaos and an unsafe situation for residents and children going to school. This is not a 'safe road' planning proposal. The concept of effective screening to satisfy current residents and possible users of the remainder of the site is not possible. This screening concept and planning assumption is not valid.

This development as a traveller site would have a very negative effect on the local environment and the amenity of the adjacent land and the value of residents houses and property.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree:

The site is within a Conservation area. We should follow our local planning rules. The site cannot be made safe from a traffic and access perspective. A developed site will have major negative impact on the amenity value and financial value of residents property. It will cause planning blight for the remainder of the site and likely lead to a creeping use of the site by more travellers, screening is not a viable plan.

Site selection and allocation process have not followed the new planning policy guidelines the NPF nor the new planning policy for traveller sites.

Do you have any other general comments on the Preferred Options paper?

The preferred options paper and the process followed draws from the guidance of the now defunct circulars 2006 and 2007 and old planning documents. The consultation methods followed did not comply with the guidance and the spirit of the new policy guidance of early local community involvement and proper needs assessment.

The site selection matrix requires rebalancing to include impact on the settled community and the impact of the amenity value of adjacent land plus the likely relationships with the settled community.

These criteria are clear in the new planning policy document they need to be in the matrix. This site in BATH OLD ROAD should be for the local community for allotments and a site for a nursery school in line with original purpose and use.

Respondent: 3678 / 1 Name: Mr Gerald Marchant Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes

I believe the Radstock site to be unsuitable for reasons overleaf and on the attached sheet

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with some but not all of the Council's assessment. (Detailed Site Assessment Tables Pages 93-94).

SITE AND SURROUNDING AREAS INFORMATION

There are already insufficient school places for local children, and the introduction of more families will further stretch these resources.

It is not necessary for travellers sites to be close to schools. Children already come by bus from outlying areas to Radstocks schools.

The local views into the site referred to will adversely affect the privacy of the travellers as well as spoiling the amenity of residents overlooking the site.

The evergreen hedge referred to provides only partial screening in only one direction and does not prevent noise and smoke.

I agree with the Council's assessment where it says "In terms of landscape character, mobile homes Would therefore

be unacceptable"

The Council's guidelines for Travellers Sites state that such sites should not be less than 1.5 km from a Conservation Area. The Assessment observes that the proposed site is actually WITHIN the Radstock Conservation Area.

HIGHWAYS

This is a major issue

At evenings and weekends, parking is already solid on both sides of the road, including in front of the Canteen site with no room for cars to pass each other. Creating an opening to a Travellers site would result in the loss of severable valuable parking spaces for existing residents.

Furthermore, to allow for visibility for vehicles exiting the site, it would probably be necessary to prohibit parking for some distance either side of the entrance. This would further restrict the already limited and over-stretched parking facilities mentioned above.

POTENTIAL FOR DEVELOPMENT AND SUITABILITY

The Assessment states that "The site is in a highly accessible location".

This is not really true. As mentioned above, the road already suffers severe congestion, and more vehicles will make this worse.

Pedestrian access is poor, with the site being located near the top of a steep hill. Walking up the hill is a real struggle for mothers with children/shopping/pushchairs.

AVAILABILITY AND ACHIEVABILITY

The proposals are in early stages, but already the area is suffering a property blight with residents unable to sell their homes because of the possibility of there being a travellers site nearby.

It is totally unacceptable for existing residents to be kept in this state of limbo for possibly another 5 years as stated in the Assessment.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, for reasons stated elsewhere on these pages

Do you have any other general comments on the Preferred Options paper?

The preferred Options Document states that the site is not within the Green Belt, but it is within the Radstock Conservation Area and I draw your attention to my comments in a) above

In conclusion, I feel that the provision of just two pitches can not justify the reduction of pleasurable living amenity to scores of local residents, when combined with the property blight that would inevitably ensue.

Respondent: 3679 / 1 Name: Mrs S Sinkins Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

If the guidance in the planning policy for travellers sites had been followed this site would not have been proposed. BANES Feb 2012 consultation document says that travellers sites should not be located within 1.5 km of a cConservation Area. Radstock became a designated Conservation Area in 1999. BANES own detailed site assessment states: mobile homes or caravans in this location would be viewed as alien and unacceptable.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Residents have to park on Bath Old Road as there are few private parking spaces available. There is nowhere else to park locally. Access to the site would be very difficult and dangerous on an already crowded and busy road.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, I do not agree. It seems unfair to cause such disruption to local residents in order to provide an unsuitable site for two families.

Do you have any other general comments on the Preferred Options paper?

I think it would be preferable for travelling and gypsy communities to be together in close proximity to local amenities.

Respondent: 3684 / 1 Name: S Duffin Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Bath Old Road site is not suitable for Gypsy, traveller or travelling showpeople as per reasons given below (Any other general comments)

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

This site is located on a very busy, congested section of road and access/egress will be very dangerous for every motorist using this road. The site is also situated on conservation area and should be protected from any development.

Respondent: 3685 / 1 Name: Mr Andy Field Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The site selected at BATH OLD ROAD is neither suitable nor achievable and should not have been shortlisted. Very clearly the guidance of the new policy "Planning Policy for Travellers sites" and the guidance contained in the Policy Impact Assessment Paper have not been followed. Circulars 2006 and 2007 have been cancelled. Out dated GTAA information should not be used, proper local needs assessment are called for. Early local consultation is mandated, proper weighting of the impact on the settled community is required, not evident in the criteria and site selection matrix used.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No I do not agree: The road access is not used suitable to service safely a permanent site of two pitches with all of the vehicles suggested in the guidance document and the likely business coming and goings of cars and large vehicles. Taken together with the daily 'rat run' traffic and the parking needs of settled resident community this would lead to traffic chaos and an unsafe situation for residents and children going to school. This is not a 'safe road' planning proposal. The concept of effective screening to satisfy current residents and possible users of the remainder of the site is not possible. This screening concept and planning assumption is not valid.

This development as a traveller site would have a very negative effect on the local environment and the amenity of the adjacent land and the value of residents houses and property.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree:

The site is within a Conservation area. We should follow our local planning rules. The site cannot be made safe from a traffic and access perspective. A developed site will have major negative impact on the amenity value and financial value

of residents property. It will cause planning blight for the remainder of the site and likely lead to a creeping use of the site by more travellers, screening is not a viable plan.

Site selection and allocation process have not followed the new planning policy guidelines the NPFF nor the new planning policy for traveller sites.

Do you have any other general comments on the Preferred Options paper?

The preferred options paper and the process followed draws from the guidance of the now defunct circulars 2006 and 2007 and old planning documents. The consultation methods followed did not comply with the guidance and the spirit of the new policy guidance of early local community involvement and proper needs assessment.

The site selection matrix requires rebalancing to include impact on the settled community and the impact of the amenity value of adjacent land plus the likely relationships with the settled community.

These criteria are clear in the new planning policy document they need to be in the matrix. This site in BATH OLD ROAD should be for the local community for allotments and a site for a nursery school in line with original purpose and use.

Respondent: 3691 / 1 Name: Mr D Thomas Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Twerton already being used.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No,
-In the middle of residential area
-Affecting residents amenities
-No parking available, already a huge problem
-Road used as a "rat run/ shortcut" vehicles already at speed
-Conservation area

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely not, two pitches proposed but residents realize this will not be the case if land is used.

Do you have any other general comments on the Preferred Options paper?

The site would mean travellers would have no privacy

Respondent: 3691 / 2 Name: Mr D Thomas Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

As residents of Bath Old Road we are very concerned about the proposals to develop the land where the old school canteen is situated. Initial information was not disseminated to us, and we found out through a chance reference in a local paper.

We would like you to clarify the ownership of the land, which has up until now been reported ambiguously. There still

seems to be conflicting evidence from archive materials. Freedom of information allows us to ask for such clarity which we understand has not been forthcoming.

We would like to point out that the proposed area is within a unique conservation area which has government protection. Also such development is in law not allowed within 1.5.kilometres. (Refer to dev. Plan document- statement of consultation Feb 2012- 09.4.34) The walls and the buildings are protected from development. We understand that previous planning applications have been refused because they did not comply with the strict regulations covering the visual façade.

In terms of amenity value we are concerned for both neighbours and travellers that their views and privacy will be compromised due to necessary screening and will significantly impact on the quality of our environment.

Every day, due to our off road parking we have to drive out onto Bath Old Road almost blind as a result of the heavy congestion of parked cars. This seriously impedes our eye line of traffic. In the mornings and evenings the speed at which cars use our road as a short cut from the Peasedown bypass is terrifying. Most mornings we take it in turns to see ourselves out of the turning for fear of an accident. This was no more apparent than when the initial 4 way traffic light system was installed in the town centre. We were not able to get in or out of our garages due the congestion combined with the narrowness of the road. Parking is a huge issue for family and friends when they visit, and this will be exacerbated even more by the possibility of an entrance onto the proposed sight. However, our prime objection is the danger in the road for adults and children. More turnings will undoubtedly increase the likelihood of a serious accident. Furthermore there will be even less parking for residents.

We therefore respectfully ask you to respond to our questions and concerns, and hopefully not through a round robin letter which does not address our particular enquiries and circumstances.

Respondent: 3693 / 1 Name: Mr Giles Foster Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Re proposed site at Radstock
Planning permission for building development of this site has been declined in the past
Very poor access to an already overcrowded road
Site is in a conservation area

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3698 / 1 Name: F.M and S.M James Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes
This road is not suitable for caravans, lorries etc. Parking is at a premium.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

This proposed site is roughly 6 ft from our front door. It is a conservation area. Parking at night and weekends is impossible. The ambulance usually has to stop in the middle of the road. We have a drive but often can't get out without asking somebody to move. There is a site at Fuller Earth that would tick all the boxes for Travellers, much better than Bath Old Road.

Respondent: 3699 / 1 Name: Mr Richard Sinkins Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The Bath Old Road site is not suitable and should not have been shortlisted. The guidance contained in the planning policy for traveller sites has not been followed.

Radstock became a designated conservation area in 1999. BANES own consultation document (FEB 2012) clearly states that traveller sites should not be located within 1.5km of a conservation area.

In appendix E of the detailed site agreement it states that mobile homes or caravans in this location would be viewed as alien and unacceptable.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Due to very limited private parking most residents have no option but to park on Bath Old Road. To gain access to the site many of these spaces would be lost, leaving local residents with nowhere locally to park. The road is already used as a short cut come race track to beat the traffic on the main road at busy times. Even with the lost spaces access will still be very restricted and quite dangerous.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

This site should not be taken forward as a formal allocation. It is too small, with difficult access and is in a designated conservation area.

Do you have any other general comments on the Preferred Options paper?

It cannot be best practice to offer the Gypsy and Travelling Community a site with poor access and provision for two pitches. As the word suggests, communities wish to live together not out on a limb in a "group" of two.

Respondent: 3733 / 1 Name: Mr+ G.C Stock Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I am aware that this area is within a Conservation area, which I understand to mean that the character of the area should

be protected and any planning proposals will not harm the character or appearance of the area. As a Council you are more than ready to enforce these rules for the local residents, will the Travellers site be subjected to the same enforcement.

Locally, Bath Old Road is a residential road with residents parking on both sides of the road and is used as a short-cut by commuters at certain times of the day. I think to have some-one trying to get onto the site with a Caravan or other vehicles are a problem waiting to happen.

Please consider again if this site is suitable for a Travellers site, and not just plans put forward in the hope no-one would complain and the Council would solve its dilemma quietly and unnoticed .

Respondent: 4096 / 1 Name: Mrs Janet Thomas Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Twerton already being used.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No,
 - In the middle of residential area
 - Affecting residents amenities
 - No parking available, already a huge problem
 - Road used as a "rat run/ shortcut" vehicles already at speed
 - Conservation area

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely not, two pitches proposed but residents realize this will not be the case if land is used.

Do you have any other general comments on the Preferred Options paper?

The site would mean travellers would have no privacy

Respondent: 4096 / 2 Name: Mrs Janet Thomas Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

As residents of Bath Old Road we are very concerned about the proposals to develop the land where the old school canteen is situated. Initial information was not disseminated to us, and we found out through a chance reference in a local paper.

We would like you to clarify the ownership of the land, which has up until now been reported ambiguously. There still seems to be conflicting evidence from archive materials. Freedom of information allows us to ask for such clarity which we understand has not been forthcoming.

We would like to point out that the proposed area is within a unique conservation area which has government protection.

Also such development is in law not allowed within 1.5.kilometres. (Refer to dev. Plan document- statement of consultation Feb 2012- 09.4.34) The walls and the buildings are protected from development. We understand that previous planning applications have been refused because they did not comply with the strict regulations covering the visual facade.

In terms of amenity value we are concerned for both neighbours and travellers that their views and privacy will be compromised due to necessary screening and will significantly impact on the quality of our environment.

Every day, due to our off road parking we have to drive out onto Bath Old Road almost blind as a result of the heavy congestion of parked cars. This seriously impedes our eye line of traffic. In the mornings and evenings the speed at which cars use our road as a short cut from the Peasedown bypass is terrifying. Most mornings we take it in turns to see ourselves out of the turning for fear of an accident. This was no more apparent than when the initial 4 way traffic light system was installed in the town centre. We were not able to get in or out of our garages due the congestion combined with the narrowness of the road. Parking is a huge issue for family and friends when they visit, and this will be exacerbated even more by the possibility of an entrance onto the proposed sight. However, our prime objection is the danger in the road for adults and children. More turnings will undoubtedly increase the likelihood of a serious accident. Furthermore there will be even less parking for residents.

We therefore respectfully ask you to respond to our questions and concerns, and hopefully not through a round robin letter which does not address our particular enquiries and circumstances.

Respondent: 4097 / 1 Name: Ms Jude King Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Radstock Infants School Canteen

- The site is heavily overlooked by number 19 Bath Old Road with no screening.
- The site would harm the character and appearance of the surrounding area – It would sit uncomfortably in the middle of a run of terrace miners' cottages integral to the heritage of the Conservation area.
- The site would preclude development of the adjacent land and prevent it being used to provide permanent housing for the indigenous population.
- The site does not have a satisfactory means of access for the number of vehicles/temporary homes proposed, nor does it have sufficient on road parking to cope. Off road parking visible from the road would be totally alien and harm the character and appearance of the surrounding area.
- The site is in a conservation area, a criteria it was suggested should count towards the make-up of the matrix. Inexplicably no value was afforded this category.
- There is insufficient room for turning vehicles/caravans in Bath Old Road especially given the current pressure on the infrastructure.
- Isolating 1 or 2 families on the site would do little to preserve Travelling culture and would invariably lead to calls to expand the site.
- The site would not be able to contain 2 pitches due to its' size/shape.
- To have one 'family' on this site would surely not be a desirable situation for a Traveller family. This would cause isolation and considerable difficulties for any children attending school.
- Notwithstanding recommendations that Conservation areas should be applied a separate status in the same manner as Areas Of National Beauty (AONB) and Green Belt land this has clearly not been adopted. Many sites have been ruled out on the basis of being in AONB but being in a Conservation area appears to have had no bearing in your assessment of this site.
- Additionally the plans risk safety on the road, it currently being used as a 'rat run' - the reduction in car park spaces would result in cars being forced to park further up the road causing considerable viewing restrictions and risk for both drivers and residents.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. Please see above

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Whilst the Travelling Community were consulting prior to the drawing up of the Preferred Options Paper, the resident community were not given this opportunity and became aware after publication solely through the local press.

It has been suggested by B&NES Council that such a consultation prior to the drawing up to the Preferred Options Paper would have been too costly and time consuming, an argument belied by the subsequent universal mail drop undertaken in respect of the future of Victoria Hall in Radstock.

We would like to make note of how poorly and non user friendly this form is. If B&NES were truly looking for an inclusive consultation process they have failed and have undoubtedly excluded large sections of the local community due to this poor design

Respondent: 4098 / 1 Name: Mr Shaun Steer Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Radstock Infants School Canteen

- The site is heavily overlooked by number 19 Bath Old Road with no screening.
- The site would harm the character and appearance of the surrounding area – It would sit uncomfortably in the middle of a run of terrace miners' cottages integral to the heritage of the Conservation area.
- The site would preclude development of the adjacent land and prevent it being used to provide permanent housing for the indigenous population.
- The site does not have a satisfactory means of access for the number of vehicles/temporary homes proposed, nor does it have sufficient on road parking to cope. Off road parking visible from the road would be totally alien and harm the character and appearance of the surrounding area.
- The site is in a conservation area, a criteria it was suggested should count towards the make-up of the matrix. Inexplicably no value was afforded this category.
- There is insufficient room for turning vehicles/caravans in Bath Old Road especially given the current pressure on the infrastructure.
- Isolating 1 or 2 families on the site would do little to preserve Travelling culture and would invariably lead to calls to expand the site.
- The site would not be able to contain 2 pitches due to its' size/shape.
- To have one 'family' on this site would surely not be a desirable situation for a Traveller family. This would cause isolation and considerable difficulties for any children attending school.
- Notwithstanding recommendations that Conservation areas should be applied a separate status in the same manner as Areas Of National Beauty (AONB) and Green Belt land this has clearly not been adopted. Many sites have been ruled out on the basis of being in AONB but being in a Conservation area appears to have had no bearing in your assessment of this site.
- Additionally the plans risk safety on the road, it currently being used as a 'rat run' - the reduction in car park spaces would result in cars being forced to park further up the road causing considerable viewing restrictions and risk for both drivers and residents.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. Please see above

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Whilst the Travelling Community were consulting prior to the drawing up of the Preferred Options Paper, the resident community were not given this opportunity and became aware after publication solely through the local press.

It has been suggested by B&NES Council that such a consultation prior to the drawing up to the Preferred Options Paper would have been too costly and time consuming, an argument belied by the subsequent universal mail drop undertaken in respect of the future of Victoria Hall in Radstock.

We would like to make note of how poorly and non user friendly this form is. If B&NES were truly looking for an inclusive consultation process they have failed and have undoubtedly excluded large sections of the local community due to this poor design

Respondent: 4173 / 1 Name: Mr David Biggs Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes. The land proposed for siting caravans etc. has always been used as a garden and has never been developed. The local schools ie Trinity and Writhlington are over subscribed. The evidence of too much traffic with its inherent problems is for all to see and be involved with on a daily basis.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The recommendation does not reflect content. I find the assessment contradictory.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

I believe some of the information on the preferred options paper does seem to be incorrect.

Respondent: 4174 / 1 Name: Mrs C Biggs Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes. The site is within a conservation area. There are no school places available. Recently an appeal to get a local child into Writhlington School was rejected because the school is over subscribed. The land that you propose to site the caravans has never been developed and has always been used as a garden.

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. I find the assessment contradictory and the recommendation does not reflect the content.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

I believe some of the information on the paper is incorrect.

Respondent: 4179 / 1 Name: Ms Rosie Laws Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes:
Many of the sites are unachievable, not sustainable, inappropriate and based on flawed data.

The process undertaken is fundamentally unsound. I draw the councils' attention to the Bath Old Road Action Group submission for details.

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

The Council:

Has failed to correctly assess the impact on the Radstock Conservation area.

Has not taken into account the constraints with regard to access, parking and highways.

Has not assessed the impact on residents' amenity.

Has not understood the constraints of the site itself in terms of its shape, square meterage or financial viability.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

It is believed that there are no places in the local schools; they are currently oversubscribed. Further, Writhlington and Trinity are both now academies, which could potentially mean that the children of traveller families would have to attend at a greater distance than the 1500m used in the scoring matrix.

The current proposals are not in line with the National Planning Policy Framework, published in March 2012, and that early consultation has not taken place.

The figures contained in the Gypsy and Traveller Accommodation Assessment (GTAA) are now five years out of date and do not provide a robust assessment for current need.

Respondent: 4230 / 1 Name: Mr James Hanks Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on:

Do you agree with the Council's assessment of opportunities and constraints on this site?

I believe that the access to the site to be very restrictive and that any works to rectify this would be at best a token effort. Also given the size of the site and the pitch provision parking will be a real issue. It already is on Old Bath Road and can only be made worse by this site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, comparatively this is a small site but I believe that having 6 families on this site is faintly ludicrous. There would be little or no room for the gypsies and their vehicles/trailers and this amount of people would put extra strain on the local area.

Do you have any other general comments on the Preferred Options paper?

I believe that this site is unsuitable because;
 -It is too small for the pitch allocation
 -Parking would be even more compromised.
 -Access to the site is very limited.
 -The site is in a designated Conservation Area.
 -It would have a negative effect on the value of residents property.
 -Given the proximity to local residents there is bound to be more opportunity for friction between gypsies/travellers and the local community.

-Proposals are not in line with the governments National Planning Policy Framework and hence should be scrapped.

Respondent: 4251 / 1 Name: Mr M A Moon Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

As Residents of Bath Old Road Radstock we feel the proposed Gypsy / Travellers site at the old Infants School is totally unsuitable . This is a designated `Conservation` area, also residents in the road Have problems parking at the best of times as most houses donot have a garage or off street parking so Bringing extra traffic into the road will only add to the existing problem. As residents for many many years we are very worried as to how this may affect the value of our Property as I`m sure many others are of the same mind that property will devalue. This site could be developed with good houses that will blend in with existing properties which would have their own parking facilities . I hope these views will be considered carefully and the right decision made for the residents of Bath Old Road Radstock

Site commenting on: GT.4 Former Radstock Infant School Canteen

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?