



Respondent:

4 / 1 Name: Mr Francis

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?		
Site commenting on: GT.6 Station Road, Newbridge		
Do you agree with the Council's assessment of opportunities and constraints on this site?		
Not entirely. The consultation document does not indicate that tracking of typical vehicle types has been done – the junction between Lock brook Rd and Station Rd is not very large. Are wide or abnormal loads likely? Given that the site is situated close to residential properties, what is the nature of the maintenance and storage – will it involve noise at an unsociable hour? As it is a business park, the idea of permanent residential pitches doesn't really work for me.		
Do you agree that the potential pitch provision be taken forward as a formal allocation?		
In the case of sites GT6 and GT8, yes, subject to my comments and comments from other people being satisfactorily resolved.		
Do you have any other general comments on the Preferred Options paper?		
Respondent: 84 / 2 Name: Mr Roger Chapman 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 is my brief response to the current consultation.		
Firstly, I very much support the council's intention to identify authorised pitches.		
Secondly I believe the site at Lower Bristol Road, Twerton is a suitable site. I have walked past there on numerous occasions and it seems harmless and does not create a nuisance to others.		
Thirdly I believe the site at Station Road, Newbridge is not a suitable site. It is in a residential area, immediately behind the gardens of a number of houses and would be located on a green area which is currently a local amenity.		
Site commenting on: GT.6 Station Road, Newbridge		
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: 224 / 1 Name: Ms Joanna Robinson Organisation: Bath Preservation Trust		
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,		

The consideration of other sites is not within the Trust's remit.

Traveller or Travelling Showpeople provision? The Trust supports the allocation of sites GT8: Lower Bristol Road, Twerton, Bath and

GT6: Station Road, Newbridge, Bath.



Bath & North East Somerset Council

Site commenting on: GT.6 Station Road, Newbridge

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

1. YES

2. It should be acknowledged that the site is located with the World Heritage Site.

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

1. YES. The use of this pitch should be regularised.

2. YES

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

Respondent:

245 / 2 Name: Mr Andy

Reading

Organisation: Environment Agency

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.6 Station Road, Newbridge

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 are pleased to see that the majority of the sites put forward in the Preferred Options Consultation are located in Flood Zone 1 (low risk). This is consistent with the Technical Guidance to the National Planning Policy Framework (NPPF) which is clear that caravans, mobile homes and park homes intended for permanent residential use should not be allowed in principle in Flood Zone 3 (high risk). This approach is also supported by Policy CP11 of the draft Core Strategy.

GT.6 – Station Road, Newbridge

Previous uses at this site may have resulted in contamination. Development of this site could therefore pose a risk to controlled waters and human health. This will need to be properly investigated and where necessarily remediated. Further guidance on dealing with land contamination is available from the following section of our website: http://www.environment-agency.gov.uk/research/planning/33706.aspx

Respondent:

263 / 4 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.6 Station Road, Newbridge

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

Subject to application there is a public foul sewer and water supply main 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?



Bath & North East Somerset Council

Respondent: 281 / 3 Name: Ms Alison Howell Organisation: Natural England

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.6 Station Road, Newbridge

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?

Preferred Options

The Council has selected six preferred sites for development. The site selection process identified four main constraints: Green Belt, landscape and/or wildlife designations, flood risk and contaminated land. Natural England is satisfied the assessment criteria and scoring matrix applied to the site selection appears robust and consistent with government policy for the planning of traveller sites.

We consider the approach taken also broadly accords with the National Planning Policy Framework (NPPF), including with respect to paragraph 110 which states "In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework".

Site Constraints

Notwithstanding the above, the Sustainability Appraisal has identified a number of issues with the development of the preferred sites, including likely impacts on landscape, ecology and public access.

- The assessment of Site GT.6 at Newbridge suggests development of or on the site would not significantly impact on the World Heritage Site, but would have some localised impact on the adjacent residential properties with little scope for onsite mitigation. We are pleased therefore that management of the adjacent woodland/planting is recognised as being of primary importance.

Natural England considers the constraints and suggested mitigation and enhancement measures outlined in the Sustainability Appraisal appear reasonable, however we would like to make the following comments:-

Sustainable Development - the Natural Environment and Biodiversity

Natural England would welcome a commitment in the Plan to moving from a net loss of biodiversity to achieving net gains for nature, as required in the NPPF paragraph 9.

Use of Brownfield land of low environmental value

The preferred options reflect the NPPF paragraph 111 in terms of the need for planning policies and decisions to encourage the effective use of land by re-using land that has been previously developed, however the Plan should also recognise that some brownfield land can be of high environmental value and ensure suitable avoidance or mitigation measures are in place.

Enhancing landscape and biodiversity in Green Belts

Natural England would welcome a greater emphasis on enhancement of the Green Belt in line with the NPPF Paragraph 81 in terms of seeking opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land".

Light Pollution – Landscape and Wildlife

Natural England would welcome a requirement to minimise light pollution in accord with NPPF paragraph 125 "By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".



Bath & North East Somerset Council

Ecological networks and Green Infrastructure

Making Space for Nature (A review of England's Wildlife Sites and Ecological Network) highlighted action to support ecological networks as an effective response to conserve wildlife in environments that have become fragmented by human activities. It stated: "An ecological network comprises a suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them..." with this in mind, Natural England would welcome a commitment in the Plan to ensuring the development of all preferred sites incorporate multifunctional green infrastructure in accordance with the emerging Bath & North East Somerset Core Strategy policy, draft Green Infrastructure Strategy and local biodiversity action plan.

Respondent: 296 / 4 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.6 Station Road, Newbridge

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.

GT6: Station Road, Newbridge, Bath

This would appear to be a good site for a Showmen's Yard. However I would not have thought the access to the site would be good for large vehicles. The roads are very narrow with on-street parking. Local residents' views should be carefully considered.

Respondent: 3095 / 4 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?

We don't have any objections to this site which appears to be suitable for use as a Travelling Showman's Yard.

Site commenting on: GT.6 Station Road, Newbridge

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"



Bath & North East Somerset Council

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: 3102 / 1 Name: Mr Anthony Lugger 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?

None

Site commenting on: GT.6 Station Road, Newbridge

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

No. The general disruption in the Chelsea road area is due to the lack of adequate parking facilities by the RUH a major employer, causing their staff to look for parking as far away as Chelsea and Station roads. Added to this will be the problems caused by site residents accessing and leaving the site plus residents on the site having more that one car and parking for random visitors. Additionally a requirement may arise where equipment is temporarily parked i.e. not containable on site, will only add to the misery of parking or access in and around Chelsea, Station and Locksbrook roads.

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

No. I feel that there are better uses for this site, which benefit the local community and Bath city council.

- 1. With a cheap tariff for all day parking, the provision of a car park for use during the day of those working in the Chelsea/Station / Locksbrook road area would be more beneficial to the community in reducing traffic problems. The additional income would also be of benefit to the council's already overtaxed resources
- 2. Additional housing, e.g. a block of flats with parking
- 3. Small business use

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

No.



Bath & North East Somerset Council

Respondent: 3213 / 1 Name: Mr D Hall 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?

After attending a consultation at the Guildhall on Wed 13th June we now have information that the Old Coal Yard, Station Rd, Newbridge has been put forward as a proposed site for a Travelling Showpeople site for storage and maintainance of their equipment plus 3 pitiches for caravans/mobile homes.

Site commenting on: GT.6 Station Road, Newbridge

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

Yes we agree that the site is suitable as storage and possible workshop for maintenance work but worry that with 3 pitches it could become very overcrowded.

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

No. Due to concerns over traffic and noise directly opposite our house and the impact this site would have on the whole of Station Road.

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

As a general comment I (Mrs Hall) would like to point out that there are slow-worms living in this area and their habitat has been much disturbed over the past years. I have seen three this year.

Respondent: 3513 / 1 Name: Mr Hayden Giles 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?

Safety:

The access from Station Road is inadequate for large vehicles as the road is increasingly busier with the use of commercial and non-commercial vehicles. Any long trailer or lorry or show ground equipment attempting to turn in or out of the site would find it extremely difficult because of the turning circle required and would lead to traffic congestion, delays and a potential danger to other road users and pedestrians alike. This would also be compounded by the danger that arises when any vehicle arriving or departing from the top end of Station Road, being hindered by drivers who park on the double-yellow lines there. This always causes potential accidents when motorists attempt to drive around them when entering or exiting Station Road and any large vehicle attempting to negotiate such obstructions will inevitably cause a danger to other motorists and pedestrians.

The implications of the assessment state that the site is nicely located in a largely commercial area that will not have a negative impact on local residents. This is wrong in that the areas of Station Road and Ashely Avenue are heavily populated with residential properties. The following concerns from myself and other residents have genuine value and will require addressing.

Quality of the Area: What impact will such a site have on the re-sell value of our homes? Is this measurable?

Noise, light and traffic pollution: Any repair or maintenance carried out on vehicles or associated show-ground equipment provide a major concern to the quality of life for local residents. The proposed Acoustic Report should go further than to simply assess the levels or disturbance caused during development of the site with ongoing monitoring of activities when the site is up and running. If compliance of BS8233 guidelines are breached then, will the site be closed down? The site would require security lighting which would inevitably impact on residents located in direct line with the entrance to the site, especially if halogen lighting were used.

Litter and Crime: Local residents have genuine concerns regarding criminal activity the site may attract from thieves and the overall tidiness of the site and surrounding area. Security measures would need to be robust. What are the proposals for this? We currently enjoy low levels of crime and are concerned about the site attracting criminal activity. Please





remember this is a residential area.

Remediation works would cause huge disruption to locals, in the form of breaks in supply of utility services, additional traffic and roadworks. This would be compounded by the major constraint already addressed by the report that stated the site would need to be decontaminated. What would this involve and who would fit the bill?

Also what are the associated facilities required for the site as stated in the Introduction 2.6? What disruption will this cause?

As far as schooling is concerned for any children who may reside at the site, the local schools are already vastly oversubscribed . What provision would be made for the education of children from the site, with the constraint that no preferential treatment can be offered in such an instance.

It has been stated that the Council consulted on an Issues and Options paper between November and January last. Although the Council's DPP Into 2.2 states, "The consultation invited site suggestion from the public," local residents to Station Road and Ashley Avenue have been inadequately informed. No direct mailing or leaflets or posters have ever been received. We only found out from a friend who told us to buy the Chronicle 4 weeks ago.

Site commenting on: GT.6 Station Road, Newbridge

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

No. For the reasons stated above

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

No. For the reasons stated above.

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

None.

Respondent:

3519 / 1 Name: Mr David

Hollingworth

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.6 Station Road, Newbridge

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

No. There are many constraints on the site as a result of the location within an established residential area. The site appears to be recommended as being part of the Locksbrook estate when in reality it is very much on the peripherary with neighbouring commercial properties currently used a gym and veterinary practice rather than heavier industrial use. Neighbouring residential properties risk suffering increased noise and traffic as a result.

The local primary school struggles to meet demand as it is - our son was unable to be placed at Newbridge despite living about a third of a mile away. To increase demand for places by developing this site seems to add further burden on already stretched service to the settled community.

It seems that there would undoubtedly be increased noise and traffic with visual impact on the landscape minimised only by existing trees and vegetation. In addition, parking for local residences is already often at a premium and development of the site is bound to stretch this further, squeezing the parking availability further for existing residents.

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

No. Apart from developing a site within a World Heritage Site it seems that it also potentially carries cost due to contamination of land.

The impact on the local existing residential community would be significant in terms of increased traffic, noise from mixed use site, additional demand on stretched parking and likely visual impact too. It also offers difficult access for what presumably could be substantial vehicles in what is a tight but busy road.



Bath & North East Somerset Council

Even more it will place even greater demand on local schools, such as Newbridge and Oldfield primary schools, that already struggle to meet demand from the current community.

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

It remains difficult to see how a clear need for a yard has been established other than to tick a box.

Respondent: 3525 / 1 Name: Mrs Meg Gore Langton 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.6 Station Road, Newbridge

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

I would suggest that the Council check out the access to this site more carefully. Station Road is always full of parked cars and large vehicles entering and leaving the current gates could be hazardous for residents' vehicles. Also, the fencing may need to be reinforced both to reassure residents who have concerns for the security of their property and to ensure the safety of the equipment to be kept in the yard.

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

I think this site would be suitable for a travelling showmen's yard rather than permanent pitches for travellers as there is considerable local disquiet about the proximity of the venue to residential areas.

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

Respondent: 3538 / 1 Name: Mr R Agar Ward 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?

- 1. The consultation document describes the area rather misleadingly; although Station Road has a gym, a veterinary surgery and a dog grooming parlour it is predominantly residential.
- 2. Station Road is a conservation area within the World Heritage site of Bath; this has not been mentioned in the document although it has been mentioned in relation to other proposed sites.
- 3. Access along Station Road would be difficult for large vehicles such as those used by showpersons, which range from large to huge. The road is not very wide especially when cars are parked: every day cars are parked down one side of much of the road and in the evenings and Sundays this extends to the whole of one side and both sides in part of its length. This would make movement of large vehicles up and down the road hazardous and difficult. Parking should not be reduced as there is already not enough for current residents' vehicles; parking is a major issue in this neighbourhood.
- 4. Ingress and egress of large vehicles would be very difficult, if not impossible, as the entrance to the site is narrow and is sharper than indicated on the plan in the consultation document which is misleading. In addition large vehicles would find it difficult to manoeuvre owing to the narrowness of the road at that point especially, but not solely, because cars can be parked misleading. In addition large vehicles would find it difficult to manoeuvre owing to the narrowness of the road at that point especially, but not solely, because cars can be parked opposite the entrance at certain times. If large vehicles could actually get in and out it would be a very slow and potentially dangerous activity causing disturbance, inconvenience and danger to residents and other road users.
- 5. The plan in the consultation document is misleading. Approximately half the area of the plot (all down one side) is





heavily wooded and uneven ground. This would presumably need to be cleared and levelled which would enormously reduce the screening referred to and would incur a significant cost. Also there are doubts as to whether the non-wooded side is stable and suitable to bear any significant load – it is much higher than the adjacent plot (gym) and would probably need significant expenditure to make it safe for use.

- 6. The proposed use would significantly impair the residential amenity. This area has been unused for well over a decade, except that the wooded area is used by local children for playing and is a haven for local wildlife. Currently residents enjoy a wooded outlook with open aspect behind. Having very large vehicles coming and going and their storage and repairs and maintenance would be noisy and visually intrusive.
- 7. The existing screening consists of deciduous trees so for much of the year would not provide effective screening. Besides which many trees would have to be removed in order to use the site and there would be no screening at the entrance which is directly opposite residential properties.
- 8. The site has no existing utilities water, electricity, gas, sewerage. This would present significant cost implications.
- 9. A development of this order would dominate the neighbourhood which is quiet, peaceful and largely residential.

Site commenting on: GT.6 Station Road, Newbridge

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

We consider this assessment presents an unduly favourable view of the site's potential for use (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?

Policy CP11 in the emerging Core Strategy document states that a site will not harm the character and appearance of the surrounding area and that the use of the site should have no harmful impact on the amenities of neighbouring occupiers. Clearly the proposed use would have a harmful impact – noise, disturbance, visual impact and road safety (see above).

The Travelling Showman's Guild document about suitable sites indicates there should be a 3 metre wide clear area around the boundary and sufficient space for turning large vehicles – this site would not provide sufficient space for either of these.

The local primary school (Newbridge) is already oversubscribed. New children would most likely have to go to school elsewhere which would not promote neighbourhood integration.

The site would require extensive and costly redevelopment and even then would be inadequate for the proposed use. And redevelopment would place undue pressure on the local infrastructure – drains, roads, schools, parking, traffic etc. This is already under pressure owing to conversion of houses into flats so increasing the population and number of households.

Extensive traffic calming measures would need to be introduced for safety of residents and other users of the road. This would be an additional cost that appears not to have been considered.

We are unaware of previous informal consultation referred to – we have neither seen nor received any posters, leaflets or other information about these proposals at any time, despite living very close to the proposed site.

Respondent: 4003 / 1 Name: Mr James Cotton 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 & North East Somerset Counci

Site commenting on: GT.6 Station Road, Newbridge

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

I think the council has underplayed the impact the site would have on adjacent properties and local residents. Compared to most other sites under consideration, this site is very close to a busy residential area with a lot of adjacent houses. It simply being a redundant area of land is not sufficient reason for its inclusion.

The council is also underestimating the impact the site would have on traffic and parking in the area, particularly on Station Road. There are no parking restrictions on Station Road and one side of the street is single yellow lines so spaces are already difficult to find for existing residents. This situation would only be made worse. Station Road is also used as a regular shortcut or bypass for traffic coming along Locksbrook Road. We regularly have commercial vans and lorries driving at speed down Station Road which is dangerous for young children.

The detailed site assessment report states that, "Childrens Services have indicated that the ability to obtain a local primary school place is more likely to be easier than in other

locations." Based on the experience of local residents, this is not the case. School places are at a real premium in the Newbridge area and it is already difficult for children around Ashley Avenue and Station Road to gain access to even their closest Primary School.

The assessment from Childrens Services is either incorrect, or it assumes that priority will be given to children on this site over existing residents.

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

No, I do not agree that it should be taken forward. It may be designated as being on or near an existing industrial estate, but if you visit the site it is clearly within a highly populated residential area. On one side, there is a gym and a vets, on the other there are the houses on Ashley Avenue and opposite it are the houses on Station Road. This means that it would have too detrimental impact on local residents – especially in terms of parking, traffic and noise.

Further to the reasons given above, the site is also inappropriate as it is one of the few suggested that lies within both a conversation area and a World Heritage Site.

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

Respondent:

4222 / 1 Name: Ms Patricia

Spencer-Barclay

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.6 Station Road, Newbridge

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 you know, (and may feel a little vexed about – sorry!) we have only just averted the major disaster of the disgustingly ruinous- on- all- fronts BRT which would have been unspeakably detrimental to us in Station Road. Now I don't think anyone here has any prejudicial view against travellers per se. Very obviously the site is not suitable for habitation, and we realise that is not on the agenda.

However, any maintenance which may be carried out on vehicles/trailers stored in the yard, should it be approved, would have to be very strictly managed by the council, and I wonder if the expenditure of that has been taken into consideration. The very last thing we want is security lights, barbed wire or any other trappings redolent of prison camps, but with all the



Bath & North East Somerset Council

thefts of metal around one feels it is inviting interference and noise and detritus.

Also this is a very busy road, with large commercial vehicles as well as private cars constantly using it. We do feel that perhaps this narrow stretch of road and restricted access may be a problem directly opposite and to the side of (in some cases) multi occupied dwellings.

Thank you for reading this. We merely wish to ensure that all aspects of this delicate and always controversial subject have been fully explored before any decision is reached. We also realise that since you own this site you must be seen to do something useful with it. Several Of us feel that as parking in the area becomes more problematic (and Permits are absolutely not the answer since we will not pay for a place we still will not get) perhaps this area could be a car park with reduced payment cards for residents and full price for visitors? Just a thought, but perhaps worth considering.