Appendix A

Response Form



Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document: Issues and Options Paper Response Form

Your responses can be made either online at <u>www.bathnes.gov.uk/planningfortravellers</u> or by completing this questionnaire and returning it by post to Gypsy and Traveller DPD, Planning Services, PO Box 5006, Bath, BA1 1JG or by email to <u>planning_policy@bathnes.gov.uk</u>

Please respond by **5pm** on **16 January 2012**.

Please be aware that copies of representations will be made available for public inspection, and cannot be treated as confidential. This information will include your name, organisation and your comment. Representations will also be available on the Council's website.

1. Your Details							
Name				Agent			
Address							
Telephone							
Email							
I am: (please tick all that apply)	The landowner				A land agent		
that apply)	A planning consultant				A developer		
	A RSL			Other			
Preferred method of communication	Telephone		Email		Post		

Background and Context

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

Monitoring

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

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

Issues

Issue 1: Site Size

4. Should the preferred approach be to allocate sufficient land to allow groups to live separately of each other?

5. Should sites make allowance for future family growth to prevent overcrowding?

Issue 2: Site Tenure

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

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

Issue 4: Mixed Use Sites

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

Issue 5: Location of Sites

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

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

11. Are there any other criteria that should be considered in site assessment?

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

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

Additional Comments

14. Do you have any other general comments on the Issues and Options Report?

Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.

Appendix B

Site Response Form



Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD)

Call for Sites Site	Assessment Response Form
	Assessment Response Form

1. Your Details	;							
Name				Agent				
Address								
Telephone								
Email								
I am:	The landov	vner		A land agent				
(please tick	A planning	consultant		A developer				
all that apply)	A RSL			Othe	r			
2. Site Charac	teristics							
Site address								
Site plan inclue	ded	Yes			No			
Site area (hect	tares)							
Current use(s)								
Surrounding la	ind use(s)							
Character of area								
Physical Cons	traints	e.g. access, s	teep slop	es, p	otential for flooding,	natural		
		features of significance, pylons						
3. Site suitabili	ty							
Is the site bein	g proposed	for a Gypsy / Ti	aveller s	ite or	Travelling Showpeo	ple		
plot?								
3. Estimating t	he pitch pot	ential						
What is the estimated number of pitches or plots that could be provided on the site, taking into account:The type of development likely to be suitable (purely residential or mixed use)								
Appropriate density, tenure (private / social rented) and mix (no. caravans)								
Estimated Potential (please state any assumptions)								
Outline sketch	included	Yes			No			

questions will provide	info	whether the site is likely to be c rmation on which a planning judge considered deliverable or not cur	ment can be	made as		
Known policy restriction	ons	Such as designations, protected areas, existing planning policy				
Physical constraints		Such as access, infrastructure requirements (water, drainage, sewerage, electricity, transport) ground conditions, flood risk, hazardous risks, pollution or contamination				
Legal / ownership problems		Landowner with expressed intention to sell or developer with expressed intention to develop. Multiple ownerships, ransom strips, tenancies or operational requirements of landowners.				
Estimated delivery rat	е	Within 5 years from now (to				
		2017)				
		Between 2017 and 2022				
		Between 2022 and 2027				
5. Any other constrain	its					
Is there any other info site or location?	ormat	ion you would like us to be aware o	f in consideri	ng this		
6. Conclusions: Delive	erabil	ity and Developability				
The site is deliverable?	e site is It is available now, offers a suitable location for Y / N					
The site is developable?	e site is Is the site in a suitable location for Gypsy / Y / N					

Please return this form with a plan / map clearly identifying the boundary of the site to:

Gypsy and Traveller DPD

PO Box 5006

Bath

BA1 1JG

And / or via email to <u>planning_policy@bathnes.gov.uk</u> by **5pm** on **16 January 2012**. The Planning Policy Team can be contacted on 01225 477548.

Appendix C

Parish Liaison Group Briefing Note

Parish Liaison Meeting Wednesday 19th October 2011

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

The Planning Policy Team is currently in the process of preparing a Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document. This will seek to allocate **22 permanent pitches** and **20 transit pitches** for Gypsies and Travellers and **1 yard** for Travelling Showpeople in Bath and North East Somerset. These are the figures that the West of England Gypsy & Traveller Accommodation Assessment (2007) recommends that the Council provides over the period to 2016.

The Issues and Options consultation document asks for site information to be put forward for assessment. <u>No areas or sites for development are recommended at this stage</u>.

The timetable for the production of this document, as set out in the most recent Local Development Scheme, is set out below:

Date	Milestone
July 2009	Project commencement
	Evidence gathering and scoping. Work did not fully start on the document until March 2010 when a dedicated officer was appointed.
November	Publication of Issues & Options document and Call for Sites
2011	Comments can be made on the issues that the document will address and the possible options for responding to them. Land considered suitable for allocation can also be put forward.
June 2012	Consultation on the Options document
	Further options including preferred site allocations.
November	Consultation on the Pre-Submission document
2012	Identify all suitable sites and ask for views on draft Site Allocations document.
March 2013	Submission of the document to the Secretary of State
June 2013	Examination
December	Adoption
2013	The final version of the document will be adopted by the Council.

The first consultation will last for a minimum of 8 weeks to maximise response time. Direct meetings with the local Gypsies, Travellers and Travelling Showpeople, and drop-in events aimed at contacting all other relevant stakeholders, including the settled community, Parish and Town Councils will be held, to accord with the Council's Statement of Community Involvement. Early contact is being made with various stakeholders and community representatives to maximise opportunities for community engagement.

Please Note:

The Council's Corporate Policy on the Provision of Sites for Gypsies and Other Campers is currently being reviewed by a group led by the Strategic Director for Children's Services. This does not form part of the Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document, although the planning team are contributing towards its development. It is anticipated that the Corporate Policy will be adopted in December 2011.

Appendix D

Consultation Summary Leaflet

Introduction

All local authorities are required to plan for sufficient land for authorised development not living in traditional of sites for residential and transitional (transit) pitches.

A national shortage of sites has lead to an urgent need to provide sites in sustainable locations. The local

Gypsy and Traveller population of Bath and North East Somerset housing currently have no authorised sites in the district.

This is your chance to shape how sites are selected and to tell us what kind and size of sites you want.







Why are sites needed?

Having enough authorised Authorised sites also accommodation benefits lessens the need for the whole community. Access to education, employment and health services improves health sites. Transit sites enable and wellbeing of Gypsy and Traveller families.

the Council to take enforcement action against unauthorised Gypsy and Traveller families to continue to travel without use of illegal stopping places.



Evidence of need

Evidence was collected in the 2007 Gypsy and Traveller Accommodation Assessment (GTAA) This showed the need to to view online on our provide 22 permanent residential pitches, 20 transit pitches and **1** Travelling Showpeople vard in the district.

The GTAA, alongside information on the consultation document and useful contact details are available. dedicated webpages. www.bathnes.gov.uk/ planningfortravellers







What Happens Next?

The questions

What happens next?

www.bathnes.gov.uk/planningfortravellers

Ways To Respond

To find out more about the Site Allocations DPD and consultation events you can visit our webpage at www.bathnes.gov.uk/ planningfortravellers or call us on 01225 477548.

Consultation forms are available across Bath and North East Somerset. Copies of the consultation document are available to view at Council offices or online at the above webpage.

The closing date for consultation is 16 January 2012.

Please return your comments on the response forms to planning_policy@ bathnes.gov.uk or

Planning Services PO Box 5006 Bath BA11JG

Gypsy and Traveller DPD

Gypsies, Travellers and Travelling **Showpeople Site** Allocations **Development Plan Document (DPD)**

Making Bath & North East Somerset an even better place to live, work

and visit

Issues and **Options consultation** and Call for Sites







Appendix E

Press Articles

Concerns raised over Council's Gypsy and Traveller Site plan

11/11/2011

Conservative Councillors in Bath and North east Somerset have raised a number of concerns over the authority's plan to find 42 Gypsy and Traveller pitches in the district.

As part of its Core Strategy development blueprint, B&NES Council has agreed to find sites for twentytwo permanent pitches and twenty transit pitches for Gypsies and Travellers, as well as one yard for travelling Showpeople.

The Council's Liberal Democrat Cabinet has launched a consultation, running until the 16th January, on the plans and has started a search for potential Gypsy and Traveller site locations.

The consultation plans were debated by councillors at a Full Council meeting last Thursday. At the meeting, Conservative councillors voiced concerns about the feasibility of finding that number of locations, as well as the proposed size and requirements for each Gypsy and Traveller pitch.

The current consultation states that to meet Government guidelines, published in 2008, each pitch must be capable of accommodating one Gypsy or Traveller family, and that the pitch should be large enough to have room for a large touring caravan and trailer, a small garden, space for two cars, a shed, and an amenity/day building. The amenity/day building would consist of a kitchen, toilet room, and living/dining area.

Conservatives have warned that if all this were to be accommodated, the amount of land required for each pitch could house two or even three new affordable homes.

Cllr Les Kew, the Conservative Shadow Cabinet Member for Homes and Planning, commented:

"The council is obliged by Government to look for locations which could be used to house Gypsy and Traveller families. However, Conservative councillors have several concerns about the council's current plans.

"We know from previous searches for Gypsy and Traveller sites that it is going to be very difficult to find suitable locations. It is therefore vital that if any potential sites do come forward from this consultation then the nearby community must fully consulted and engaged before any final decisions are taken. In rural areas, Parish Councils should be engaged at an early stage.

"I also think that residents would be very concerned by what is currently proposed to be accommodated at each Gypsy or Traveller pitch. If each pitch is to accommodate a day building with kitchen, dining space and bathroom, as well as room for two cars, a caravan and trailer, then this could be enough land to build two or three new affordable homes, which is of great importance when we have thousands of people on our housing waiting list. This would surely be too much for one pitch when the council is trying to prioritise more affordable housing. Furthermore, the future management of the sites and the environmental impact of any sites would need to be carefully considered and monitored."



Where should travellers site be?

visit our website:www.thisisbath.co.uk

Lottery bid to improve gardens

Bath and North East Somerset Council is to bid for lottery funding to help revamp Sydney Gardens.

The authority has been given the opportunity to apply for a Heritage Lottery Fund (HLF) grant as part of the Parks for People programme.

This money could then be used to build on the success of the recent extension work at the Holburne Museum and make the surrounding area more attractive for residents and visitors.

A report submitted to the council's cabinet last week said the bid, which will cost around £30,000, will come from an existing fund for the restoration of the park.

It said: "The proposed restoration of Sydney Gardens presents a great opportunity to take forward a project that has been identified for a number of years and one that, if successful in obtaining funding from HLF, will restore one of the oldest and finest pleasure gardens within the country for the benefit of residents and visitors and reconnect with and provide a complementary setting to the recently refurbished and extended Holburne Museum."

It added that to abandon the bid would go back on the council's promise to invest in the park, and politicians voted in favour of applying. A consultation exercise will be launched later this month to investigate potential sites in Bath and north east Somerset to house travellers and gypsies.

BCH-E01-S2

The controversial issue is one which the local authority has known it has needed to address for a number of years.

Government legislation means the council will have to provide 22 permanent and 20 transit pitches, as well as one yard for travelling showpeople, by 2016.

The public consultation, which will enable people to suggest possible sites, is scheduled to start next Monday and run until January 16.

At the moment a group of travellers are living on a makeshift site next to the Stothert and Pitt sports ground on Lower Bristol Road and some people have complained that it is increasing in size and numbers.

However, two people who have been staying there over the summer said most of the caravans were empty and they were actually going to start scrapping vehicles.

A 28-year-old man, who did not want to be named, said there were around 15 people staying there at the moment.

He said: "A lot of the caravans are going to be scrapped because people had been living there over the summer but have moved on now.

Siobhan Prideaux s.prideaux@bathchron.co.uk

"So we are in the process of pulling them apart."

A 26-year-old woman, who also did not want to give her name, said they had been impressed by the way the council had been dealing with them.

She said: "They have been really helpful with us. They have brought some cardboard down so the vehicles don't get stuck in the mud and we are looking at putting some fencing up so the dogs don't run up the hill.

"We have also had some people from the environmental health team here to see what we are doing, where we are getting our water from and what we were doing about toilets."

The issue of traveller and gypsy sites was discussed at a B&NES Council cabinet meeting last week.

Peter Duppa-Miller, from the B&NES Local Councils' Association, urged the authority to consult widely with parish and town councils and make sure all the necessary information was easily available for the public.

People will be able to give their views by either going online to *www.bathnes.gov.uk* or by picking up forms in their local libraries, at the Guildhall or at the Riverside offices in Keynsham.



MAKESHIFT SITE: The travellers' camp on Lower Bristol Road

PICTURE: Lloyd Ellington

'We don't want another Dale Farm'

The ruling Liberal Democrat administration at the Guildhall said it was grasping the nettle over travellers' sites.

Councillor Katie Hall (Lib Dem, Lyncombe) said it was important that the issue was addressed and firm guidelines set down, so the authority did not end up with a situation such as the one at Dale Farm in Essex.

She said: "Finding and agreeing on sites for gypsies and travellers will mean far fewer problems of unauthorised encampments. We don't want to end up like Basildon.

"It has taken the Lib Dems

to face up to this tricky issue, for so long ignored by the Conservatives.

"Gypsies and travellers get a bad name in the tabloid press, but most merely wish to go about their lives in a quiet and lawful manner.

"Providing them with proper sites, and giving them access to services and support, means that all communities have the best chance to live harmoniously side by side."

However, the Conservatives have raised concerns about the proposed size of the pitches, arguing that they could each accommodate two or three new houses.

Councillor Les Kew (Con, High Littleton) said: "I think that residents would be very concerned by what is currently proposed to be accommodated at each gypsy or traveller pitch.

"If each pitch is to accommodate a day building with kitchen, dining space and bathroom, as well as room for two cars, a caravan and trailer, then this could be enough land to build two or three new affordable homes, which is of great importance when we have thousands of people on our housing waiting list."



Win a £150 Bath Christmas Market hamper

Festive competition entry form on page 18

Town to pilot new scheme tackling its drink issues

Midsomer Norton is to be- By Suzanne Norbury

councillor Michael Evans



Fallen heroes

of conflicts

remembered

Remembrance round-up - page 25

Police appeal for help after man injured in assault

Police investigating a serious assault in Midsomer Norton which left a man unconscious in the street are hoping people will come forward to help identify a group of attackers.

The random attack by a group of four men in their late teens or early twenties left a 30-year-old local man with a broken nose, cuts, bruises and back and neck injuries.

He was assaulted while walking home from a night out in the town on Thicket Mead, close to the Phillis Hill roundabout, at about 11pm on Saturday, November 5. SSG www.thisissomerset.co.uk

School forms a partnership with closest international neighbours

Shoscombe Primary School has By Angela Brennan launched a new link with schools in France and Ireland.

The link is a part of a EU scheme to create partnerships across Europe and improve education standards.

Pupils and teachers from school community. Shoscombe will be visiting their new partners and working on joint projects over the next two years through the Comenius programme, which is funded by the EU and managed in the UK by the British Council.

The programme will provide funding and professional development to enable pupils and teachers across Europe to work together and learn about each other's culture and education methods.

Shoscombe will be working with Ecole Lafon Feline in Bordeaux and Gurraneasig National School, County Cork.

Children and teachers from all three schools will be working together on an international project called Tomorrow's Garden.

It will focus on local history, organic gardening, health, litbuild an understanding of the and children at our school. partners' languages and cultures and to gain skills for the to further develop their prochildren's future lives and ca- fessional practice whilst our reers.

Through these projects, and the wider world will grow."

angela.brennan@westnews.co.uk

by involving parents and carers in the partnership, pupils from Shoscombe will also learn more about the diversity of their own

Pupils will use email and other online technology to communicate with their partners through a project website where they can share information.

While in the Shoscombe area the visitors stayed with host families and sampled traditional English food.

The host pupils performed songs from the area and linked to their topic research into the history of coal mining.

The visitors have spent time in the classroom joining in with sports and activities and enoying a sightseeing bus tour of Wells.

Shoscombe headteacher Wes Poirot said the school was delighted to have been selected for a Comenius grant.

Mr Poirot added: "Our links with schools in France and Ireerature and environmental art to land will benefit both the staff

> "Staff will get the opportunity children's cultural awareness of



IN TUNE: Shoscombe pupils sing mining songs for their visitors

BAWN20111111H-006 C

BSG-E01-S2



WORKOUT: The French children demonstrate their morning exercise plan to the Shoscombe pupils Pictures Will Nicol BAWN20111111H-003 C

Thursday, November 17, 2011 21 **Traveller** site consultation

A consultation will be launched later this month to investigate potential sites in Bath and North East Somerset to house travellers and gypsies.

The controversial issue is something which the local authority has known it needs to address for a number of years.

Government legislation means the council will have to provide 22 permanent and 20 transit pitches, as well as one vard for travelling showpeople, by 2016.

The public consultation, which aims to engage with residents as well as parish and town councils, is scheduled to start on Monday, November 21, and run until Monday, January 16, 2012.

No information about which sites in the area are being considered has yet been published.

The issue of traveller and gypsy sites was discussed at a cabinet meeting last week and Peter Duppa-Miller, from the B&NES Local Councils' Association, urged the authority to consult widely with parish and town councils and make sure all the necessary information was easily available for the public.

People will be able to give their views by either visiting www.bathnes.gov.uk or by picking up forms in their local libraries or council offices.



N	WC	0	Bath				w Year, Ne online now	w You	ço	8	John Lewis
HOME	NEWS	MUSIC	FOOD & DRINK	FILM &	THEATRE	EVENTS	SUBSCRIBE	CONTRIBUTE	CONTACT	rus	
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Thursday 24 November, 2011 - Last updated at 21:32

VIEWS SOUGHT ON TRAVELLER SITES

Local people's views are being sought on how Bath & North East Somerset Council should plan for the accommodation needs of the local Gypsy and Traveller population.

An Issues and Options paper has been published for public consultation setting out the main issues relating to how sites should be provided and asking for people to come forward with information on possible sites.

The Council is planning to provide 22 permanent residential pitches, 20 transit pitches and 1



Travelling Showpeople yard across the District, as required by the evidence collected in the 2007 Gypsy and Traveller Accommodation Assessment (GTAA). That evidence, alongside information on the consultation document and contact details are available to view on the dedicated webpages: http://www.bathnes.gov.uk/planningfortravellers.

This is your chance to shape how sites are selected and to tell us what kind and size of sites should be provided. Any comments on the document or information on sites that may potentially be suitable for allocation can be sent in using the Response Forms that are available to download from the dedicated webpages. The closing date for consultation is 16 January 2012.

FIND US HERE:





BATH WEATHER:



2 Thursday, December 1, 2011

Workers in strike action

FROM PAGE 1

lections continued as usual. Where there was disruption to domestic waste collections householders were asked to take their waste back in until the next scheduled collection.

All youth hubs in the area were closed for the day as was the mobile project.

Passengers using the Mid-somer Norton Dial-a-Ride service were advised to call the service for information.

Norton Hill and Somervale schools were open for Year 11 pupils to take their mock exams and lessons for sixth form students continued unless their teacher was on strike.

Both Writhlington and Chew Valley Schools were closed for the day although non-striking staff reported for work as usual.

Primary schools were also affected with Bishop Sutton, Cameley, Camerton, Clutton, Farmborough, Farrington Gurney, Fosse Way, Pensford, Shoscombe, St Nicholas, Ubley, Welton and Westfield closed.

Chew Magna School was closed for a scheduled inset day while Longvernal, Midsomer Norton and St Mary's at both Timsbury and Writhlington were partially open.

Post cards with Scouts

Post early for Christmas is the message from 1st Midsomer Norton Scout Group, who are selling stamps for their scout post at 15p.

The last collection takes place at noon on Saturday, December 10. Stamps are available from businesses in the area which have also agreed to host post boxes.

Deliveries will take place in Midsomer Norton, Radstock, Westfield, Writhlington, Clandown and Paulton. The group apologises that they are unable to cover other villages.

People should address the envelope correctly to enable speedy delivery.



www.thisissomerset.co.uk SSG

SAFE HAVEN: Left, Hannah and Gabriella emerge from the shelter; right, Olivia and Bobby in the shelter Pictures Will Nicol



Pupils step back in time to build air-raid shelter

Pupils at Welton School took a step back in time without leaving the classroom by creating an Anderson shelter to help them with their Second World War studies.

Caretaker Chris Day built the walls with children from Years 4 and 5 helping to paint the shelter inside and out.

The pupils also added the finishing touch of

vegetables on the roof to

make it look like a garden to the Luftwaffe passing overhead.

Hannah, Harry, Shannon and Andrew said they had thought it would be "cool" to build the life-size replica complete with an authentic smell inside.

An old tea crate served as a table and the pupils used torches so they would be able to see what they were doing inside when the air-raid siren was sounded.

Donkeys to lead Nativity parade at town's Christmas celebrations

Two donkeys from HorseWorld By Suzanne Norbury will provide extra authenticity to the Nativity procession that will form part of Midsomer Norton's Christmas Fair.

The event, which takes place tomorrow, will feature Benjamin and Barnaby, from the Whit-

church charity's visitor centre. The two donkeys will begin this year's festivities, organised by the Chamber of Commerce and Welton Baptist Church, when they escort "Mary and Joseph" down the High Street accompanied by children carrying handmade lanterns.

HorseWorld visitor centre yard manager Karen Hardwick said the charity wanted to add a little Christmas sparkle for people who support their work. She said: "We know that many people living in Radstock, Midsomer Norton and surrounding villages have taken admembership scheme this year.

s.norbury@westnews.co.uk

"We're delighted to have been invited to take part in this year's fair and to take the opportunity further strengthen our links with the communities we serve.'

Visitors to the Christmas Fair can join a bid to beat the Guinness Book of Records entry for the most living figures in a Nativity scene. The record stands at 567, set in Italy last ecember.

Welton Baptist Church is asking people to support the event by dressing as a shepherd by wearing a tea towel and dressing gown.

Festivities will begin at 3.30pm when children are invited to create their own lanterns between 3.30pm and 5.30pm in Midsomer Norton Library.

The main evening entertainvantage of our free repeat visit ment takes place between 6pm tures displayed in each of the and 9pm, with the High Street listed shops.

shops opening late for Christmas shoppers.

The illuminated procession will begin at 6.45pm before the attempt to break the record and light switch on begins at 7pm. People taking part will also be encouraged to sing carols.

Mayor of Midsomer Norton Paul Myers said: "The only way we can break the record is for everyone, old and young to join in the community effort to put Midsomer Norton on the map and enjoy a great evening for all the family. We're asking as many people as possible to dress as shepherds and come on down and be counted.

Shoppers also have the chance to win £150. Anyone wanting to be in with a chance has to fill in the middle pages of the programme, which also includes the words to carols, with the names of the nativities pic-

RECYCLI



FESTIVE ROLE: Donkeys Benjamin and Barnaby

Somerset Guardian on the web at www.thisissomerset.co.uk Editorial policy CONTACTS **Opinion**10 This paper aims to provide news and

Letters 11-12

information that is fair accurate and balanced,

78b High Street, Midsomer Norton BA3 2DE Tel: 01761 417778 Fax: 01761 419128 Editor: Sam Holliday

Consultation on traveller sites

Where should Bath and North East pitches, 20 transit pitches and one Somerset council create traveller sites within the district?

That is one of the questions the council is asking residents as part of commodation Assessment. a consultation on how it should plan

travelling show people yard as required by the evidence collected in the 2007 Gypsy and Traveller Ac-

That evidence, alongside inform-

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ASSESSMENT AND ADDRESS OF ADDRESS	

Property guide

See centre pullout

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Recycled paper made up 75.5% of the raw material for UK newspapers in 2004

for the accommodation needs of the gypsy and traveller population.

An Issues and Options paper has been published setting out the main issues relating to how sites should be provided and asking for people to come forward with information on possible sites.

The council is planning to provide 22 permanent residential consultation is January 16.

ation on the consultation document and contact details is available to view at www.bathnes.gov.uk/planningfortravellers.

Comments on the document or information on sites that may be suitable for allocation can be sent using the response forms on the website. The closing date for the

30ft tree to be sold for charity

As much as Holcombe resident Mandie Ravetta likes Christmas, she could do without a 30ft festive tree outside her kitchen window. So she is selling the tree to raise funds for a disability charity.

Mrs Ravetta said the tree had been planted by the home's previous owner but had grown too close for comfort.

She said: "It has got to come down so I thought it would be a good idea to try to sell it, with the money going to support the cerebral palsy charity Scope.

"It stands at 30 feet tall so it would need to be a business that is looking for a Christmas tree."

To buy the tree call Mrs Ravetta on 01761 417778.

Appendix F

Consultation Covering Letters and Email

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File Message								
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Cc: 🖉 Simon De Beer; 🖷 Richard Daone; 🗷 Meghan Rossiter								
Bath & North East Somerset Council Telephone: 01225 477525 E-mail: <u>sarah_johnston@bathnes.gov.uk</u> <u>www.bathnes.gov.uk</u>								
Making Bath & North East Somerset an even better pl	ace to live, work and vis	SIL						

Bath & North East Somerset Council

Date: 29 November 2011 Our ref: Your ref: Direct line:(01225) 477548 Fax: (01225) 394199 Minicom: (01225) 477535 E Mail: planning_policy@bathnes.gov.uk

Dear Sir / Madam

Bath & North East Somerset Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD) – Issues and Options consultation paper and Call for Sites

I am writing to inform you that Bath & North East Somerset Council is undertaking a consultation on the issues and options relating to the development of sites to provide accommodation for Gypsies, Travellers and Travelling Showpeople between **21 November 2011** and **16 January 2012**.

The District Council is required to include within its Local Development Framework (LDF) sites to provide accommodation for Gypsies, Travellers and Travelling Showpeople. As you may be aware, the DPD is intended to allocate both permanent and transit sites for Gypsies, Travellers and Travelling Showpeople to meet local need.

The Council is at an early stage of preparation of the DPD and would like to engage with all parties likely to be affected by or with an interest in Gypsy and Traveller sites. As a potentially interested party you are invited to comment on the document using the response form referred to below.

The consultation offers a number of opportunities to get involved:

- A consultation document and a response form are available on our web-page at <u>www.bathnes.gov.uk/planningfortravellers</u>.
- Hard copies of the consultation document can be viewed in all local libraries and at The Guildhall, Bath, The Hollies, Midsomer Norton, and Riverside, Keynsham.
- Drop-in events are scheduled to take place across the District during the consultation period. These will take place at the following locations:
 - Unit 9, The Centre, High Street, Keynsham, **1 December 2011**, 2-5pm
 - Midsomer Norton Library, 6 December 2011, 1.30 4.30pm
 - Green Park Station, Bath, **8 December 2011**, 1 5pm
- Written comments using the response form can be sent by email to: planning_policy@bathnes.gov.uk or posted to the address below:

Making Bath & North East Somerset an **even** better place to live, work and visit

Gypsy and Traveller DPD Bath and North East Somerset Planning Services PO Box 5006 Bath BA1 1JG

It should be noted that any comments made cannot be treated as confidential and will be made public. The deadline for responses is **5pm** on **Monday 16 January 2012**. If you have any queries, please do not hesitate to contact me.

If you would like to continue to be kept informed of this document please notify us. If we do not hear from you by the end of the consultation period on 16th January 2012 we will assume that you do not want to receive any further correspondence in relation to the DPD.

Yours sincerely,

Meghan Rossiter Senior Planning Officer Appendix G

LDF Newsletter

Local Development Framework

Update

What's in this issue?

- Core Strategy update
- LDF Consultation
- Neighbourhood Planning
- Placemaking Plan
- Retrofitting and Sustainable
 Construction
- Planning for Gypsy & Traveller sites
- Infrastructure Planning
- Retrofitting and Sustainable
 Construction SPD
- World Heritage Site Setting SPD
- Houses in Multiple Occupation

Planning policies are important as they shape and guide how Bath & North East Somerset will change and develop over the next 20 years and beyond. Planning policies are set out in a suite of documents which together form the Local Development Framework (LDF). The LDF is broadly made up of two types of documents:

- Development Plan Documents (DPDs) which set out the policies against which planning applications are determined; and
- Supplementary Planning Document (SPDs) which explain in more detail how some of the key policies will work

This issue of the Newsletter updates you on these planning policy documents. The Council has been listening to the issues raised by you, the community and the documents being prepared respond to these issues as well as to legislative changes proposed by the coalition government and other pressures on the District.

Bath & North East Somerset Council

Retrofitting and Sustainable Construction

Pursuing a low carbon and sustainable future in a changing climate is one of the specific issues that the Core Strategy seeks to address. A Retrofitting and Sustainable Construction Supplementary Planning Document (SPD) supports the Core Strategy with more detailed information on how to improve both existing and new building's energy efficiency and adaptability to climate change.

The SPD will provide residents and developers in the district with a user friendly guide to reducing energy consumption and generating renewable energy.

Public consultation on the draft will start in April 2012. Email us at green_building@bathnes. gov.uk for more information.

A related project, Bath Homes Fit for the Future is one way that the council, together with Transition Bath, Bath Preservation Trust and Bath aims inspire and inform the community about:

- Making homes warmer and cheaper to heat
- Retrofit of traditional and listed homes
- Renewable energy generation
- Low energy and sustainable design

Go to www.bathhomesfitforthefuture.co.uk for more information and to find out about the Open Homes weekend on 17th & 18th March

Planning for Gypsy & Traveller Sites

A new Site Allocations Development Plan Document is being drafted to consider where land should be allocated for use as Gypsy, Traveller and Travelling Showpeople sites to meet local need. We have recently begun an 'Issues and Options' consultation which runs until 16th January 2011 identifying the issues and the opportunities for dealing with those issues. We will also be conducting a 'Call for Sites' during this period.

The consultation asks how sites should be identified and assessed before identifying preferred sites. An Options paper is then due to be consulted on in Summer 2012.

For more information on this topic and to get involved keep an eye on our webpages at www.bathnes.gov.uk/planningfortravellers.

Events will be held where there will be the opportunity to speak with members of the Planning Policy Team

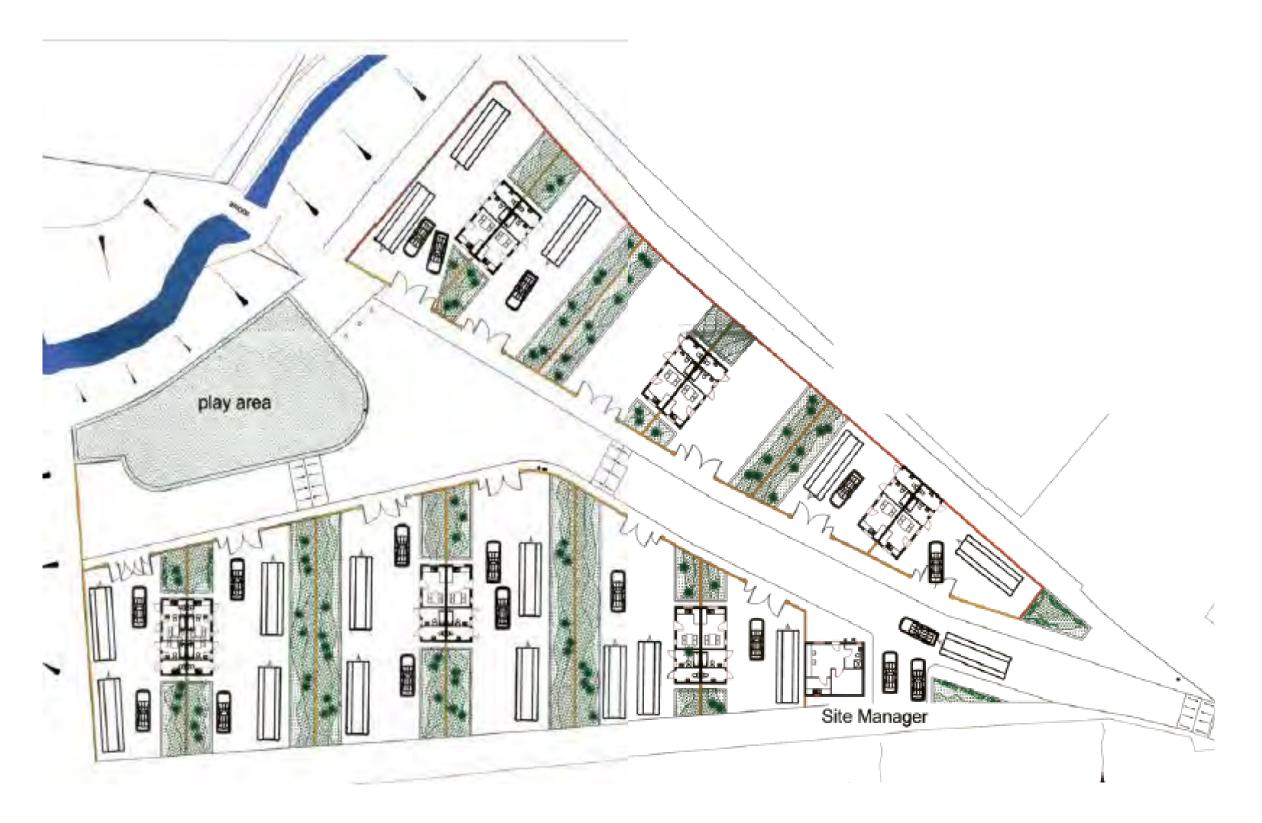
Appendix H

Display Posters

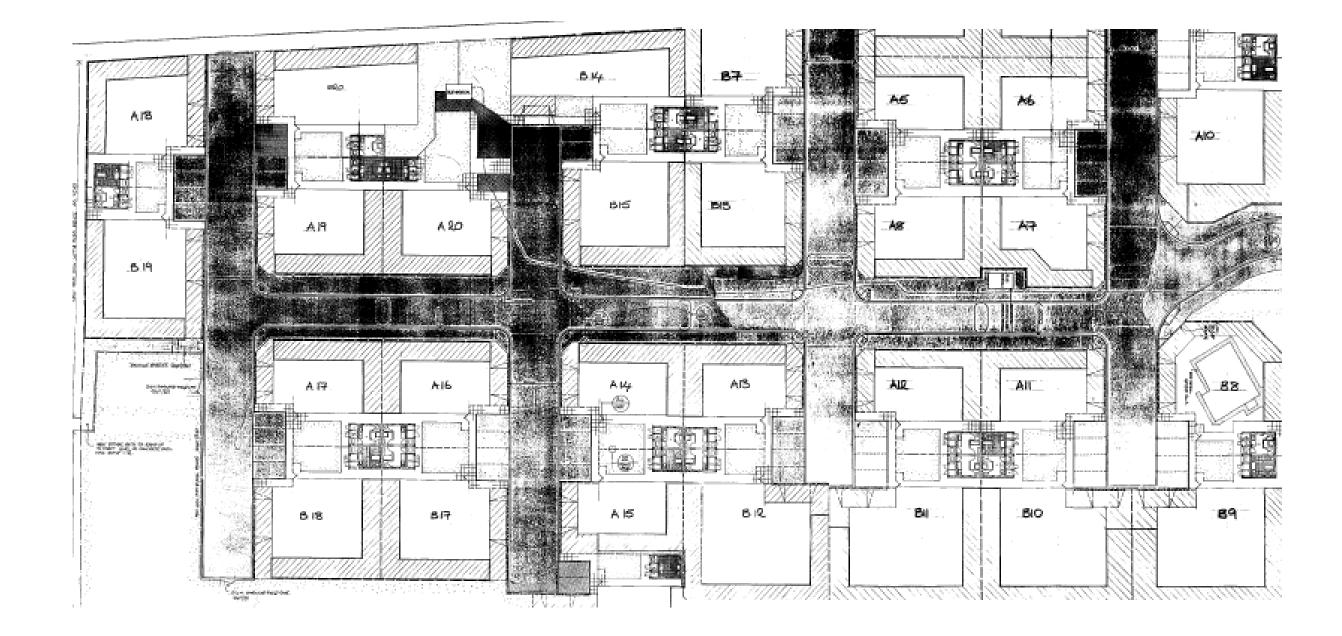
SMALL SCALE SITE – URBAN LOCATION



TRADITIONAL SITE DESIGN



LARGE SITE WITH SMALL INDIVIDUAL "CLOSES"



PERMANENT SITE



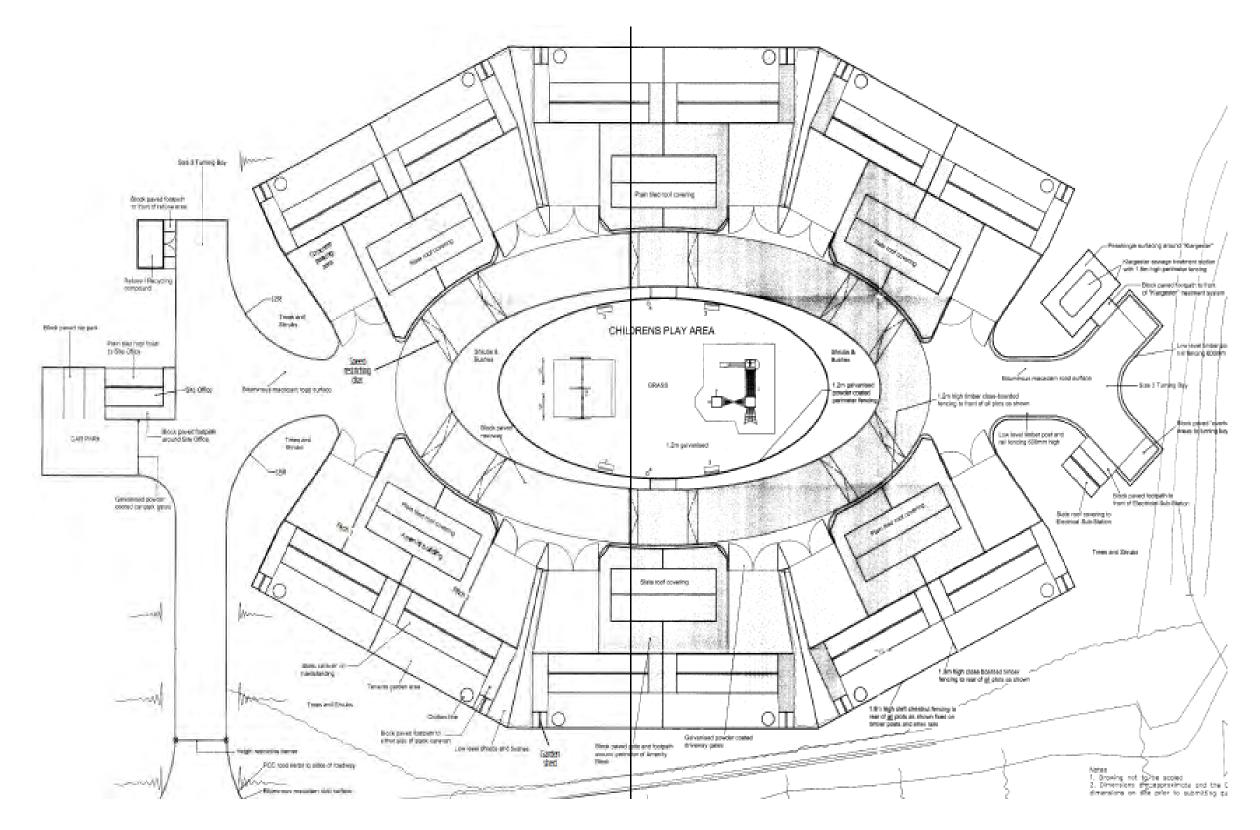
WHAT CAN GYPSY AND TRAVELLER SITES LOOK LIKE?

DESIGNS FROM GOOD PRACTICE GUIDANCE

PERMANENT SITE



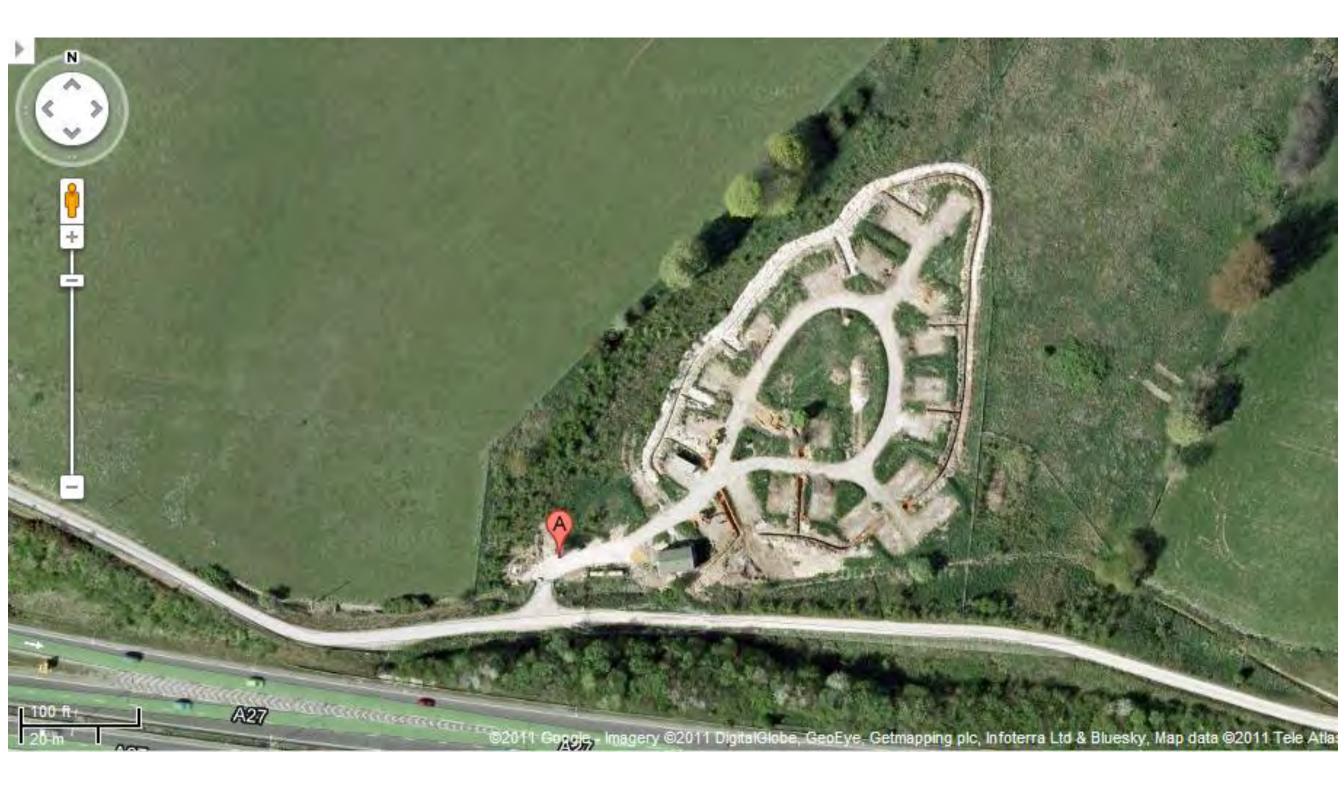
CIRCULAR SITE DESIGN



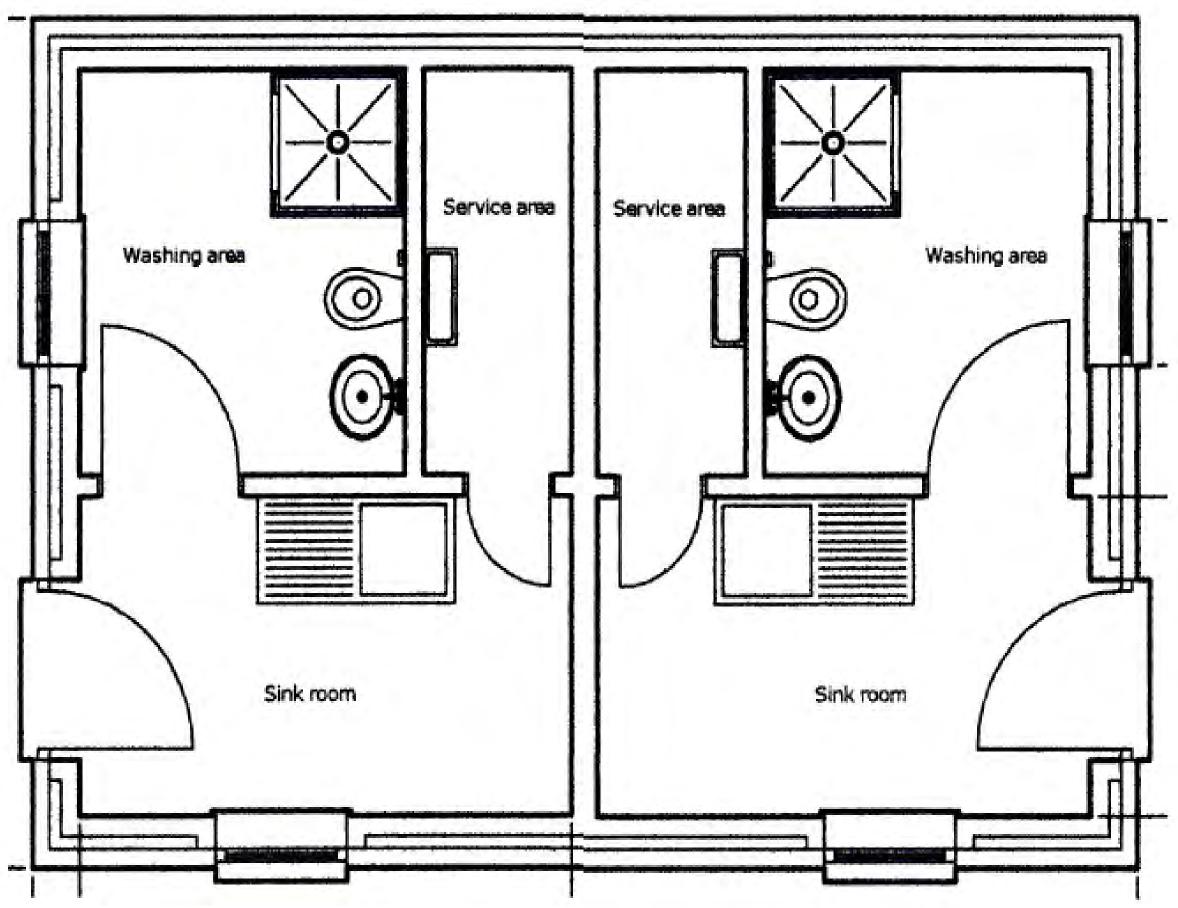


EXISTING SITES FROM ACROSS THE COUNTRY

TRANSIT SITE, BRIGHTON

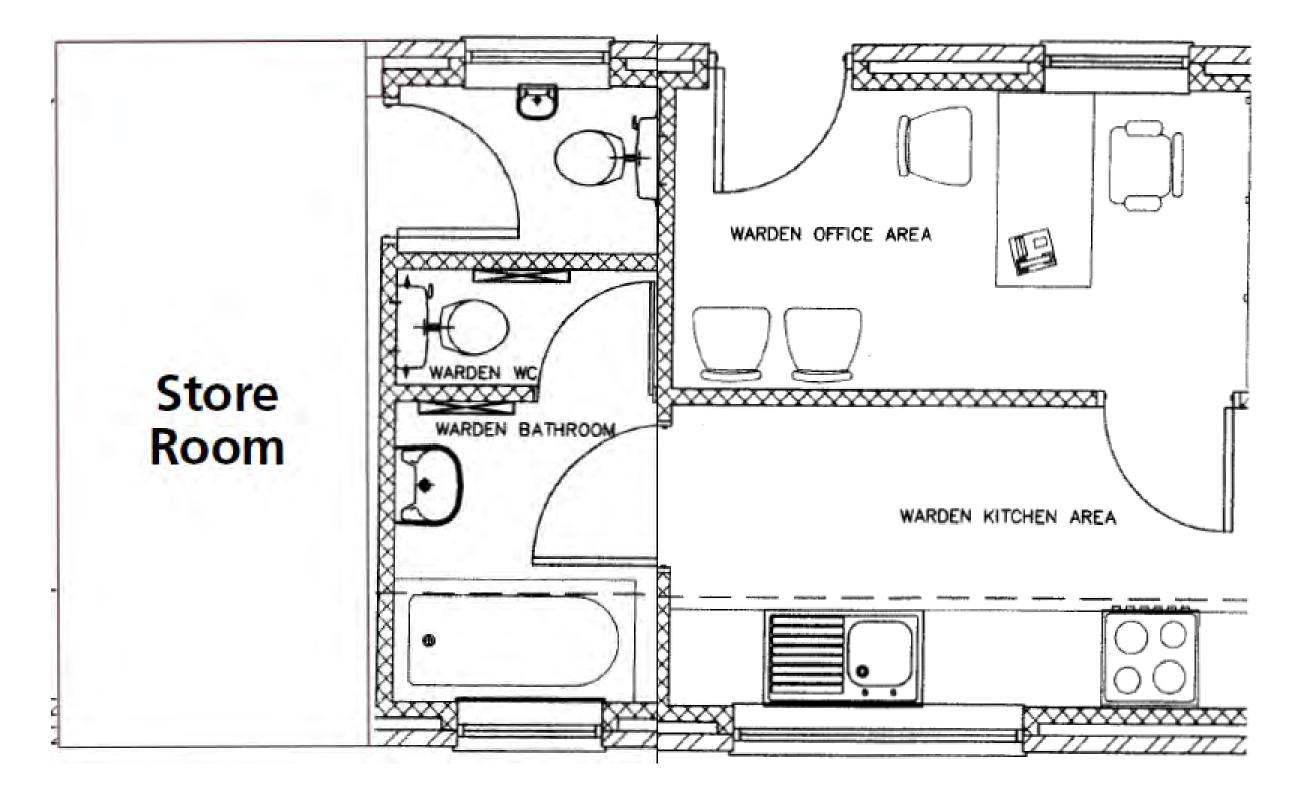


PAIR OF AMENITY BUILDINGS





RESIDENT WARDEN'S OFFICE AND ACCOMMODATION: TRANSIT SITE



Appendix I

 Table of Consultation Responses

Question 1	Question 5	Question 9	Question 13
Question 2	Question 6	Question 10	Question 14
Question 3	Question 7	Question 11	Question 15
Question 4	Question 8	Question 12	

Ques	Question 1: Should the evidence base be updated to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople in Bath and North East Somerset beyond 2016? If so, in what ways does it need updating?		
#	Respondent	Consultation Response	
13	96 Keynsham Town Council	Yes, the evidence is not in line with the timeline for the Bath and North East Somerset Core Strategy, which is 2026.	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	The GTAA provides a secure base for current planning but will need to be updated on a regular basis. The Guidance for GTAAs still stands (as does C 1/2006 at the time of writing) and this should continue to be used as a basis of estimating needs (which includes those inappropriately housed). Any needs assessment should in our view focus on needs for accommodation for Gypsies and Travellers based on the Housing Act definition both quantitatively and also to give a good view of the variety of sites needed (in terms of size and tenure). However to wait until after 2016 to start making provision for post 2016 needs will inevitably mean that needed provision will be delayed and a return to the situation of the past with a build up of need and increase in both unauthroised camping and inappropriate accommodation with all the ills that both produce. In our view the council should make provision now for post 2016 needs estimated on the basis of a 3% compound growth rate. We would point out that the DPD will only be adopted at the end of 2013 and that 2016 is only tow years away from that date. Developing national policy indicates that councils should have a five year supply of land identified. The plans for the DPD fail to do this. As the above mentioned Inspector said in relation to needs in the future in Rugby: 130. Although the Council's suggested change includes the GTAA's figures beyond 2012, these are based on household formation rates which do not take account of the many factors which need to be considered when making a robust assessment. So to be effective the CS should indicate that the allocation of further sites may be necessary if a later up-to-date assessment of needs indicates that there is a shortfall (or vice versa).	
		Hence a similar approach could be taken by BANES making provision beyond 2016 in the DPD with the provisio that as more up to date information comes on stream allocations can be altered.	

20	188 Freshford Parish Council	Yes, but only if it doesn't delay the start of finding and providing sites as defined following the 2007 review
27	246 Combe Hay Parish Council	YES – it is suggested that the GTAA should be updated at 5 yearly intervals (earlier if triggered by a significant trend in the annual January "caravan counts").
32	257 Valley Parishes Alliance	Context and Monitoring 3.11 We are concerned that no site provisions, with underlying estimates of numbers of people, are projected for post- 2016. We, therefore, recommend that B&NES take the longer view until at least 2026, which is the timeframe for the Core Strategy. This longer projection is required to ensure that site requirements are not underestimated and have to be re- visited very soon after the DPD is adopted in December 2013.
28	264 Englishcombe Parish Council	EPC is of the opinion that the process of bringing forward proposals has been delayed too long already; we therefore support proceeding on the basis of data currently available.
26	315 Charlcombe Parish Council	It would seem sensible to include a target for accommodation needs post 2016, accepting that available information may only be approximate, but this can be refined as time progresses
15	1415 Peasedown St. John Parish Council	Yes. With statistical information.
8	1555 Stowey Sutton Parish Council	We believe that 2016 is planning far enough ahead in respect of communities which by their very nature are nomadic.
41	2587 Children's Society	From our experience working with Travellers, the numbers may rise if more people are subject to poverty. It is increasing difficult for families living on the road with few places for them to park up.
17	2589 Bristol City Council	It is appropriate to address the accommodation needs for the period to 2016 as set out in the GTAA.
25	2593 Ms Judi Grant (Individual)	Yes, in principle.
42	2598 Keynsham Civic Society	Yes. We do not know the current situation

		bss Bath and North East Somerset?
#	Respondent	Consultation Response
13	96	Yes
	Keynsham Town Council	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	We agree with the contents of the indicator but it should also include a sound assessment of unauthorised camping. The current caravan counts would be ineffective for this purpose and a more robust monitoring system would need to be put in place which not only draws in records held by Police and other agencies. It should include an eviction report. This will help monitor the true level of need.
20	188 Freshford Parish Council	No. It would be more honest if the indicator demonstrated that the removal from an unauthorised site was to an authorised one – within or outside the Local Authority's area.
27	246 Combe Hay Parish Council	YES – see also the response to Question 3.
28	264 Englishcombe Parish Council	EPC is satisfied that the proposed additional indicator is suitable for purpose.
26	315 Charlcombe Parish Council	The net additional sites provided annually should be related to the overall pitch requirement within B&NES and the shortfall.
30	1111 Compton Dando Parish Council	Yes
15	1415 Peasedown St. John Parish Council	Yes
8	1555 Stowey Sutton Parish Council	We believe there are insufficient permanent sites proposed under this plan.
41	2587 Children's Society	At present there are no sites in BANES that we are aware of that are authorised.
17	2589	The additional indicator is welcomed. However, it is considered that it would benefit from further detail (e.g.

	Bristol City Council	inclusion of the location and date of unauthorised sites) to enable trends to be assessed.
25	2593 Ms Judi Grant (Individual)	Will this achieve the stated objective of reducing the level of unauthorised development? Can anyone legally monitor any trend in gypsy population growth cf. with the rest of the population who seem to be limiting family size? Surely there will always be a problem of illegal sites if not enough pitches are provided to accommodate the demand at any point in time. Perhaps more transit pitches are the answer rather than less flexible permanent sites.
		Surely whatever measures are put in place, they rely on excellent communication between the L.A. and the Gypsy & Travelling Community. The relevant groups need to know exactly what facilities are available, where and when in order to plan their movements. They also must be made aware of what is expected of them whilst living within the L.A. boundaries so that ignorance of local planning law, environmental issues, areas of green belt and all relevant issues cannot be a viable excuse. Of course monitoring is important, but constant & up-to-date communication should help to prevent major problems.
42	2598	No
	Keynsham Civic Society	

Que	Question 3: Are there any further monitoring indicators that may be suitable for inclusion in the DPD?		
#	Respondent # and ID	Consultation Response	
13	96 Keynsham Town Council	The Town Council are not aware of any.	
20	188 Freshford Parish Council	No. The question is too hypothetical	
27	246 Combe Hay Parish Council	YES – a.Number of Police records of crime and/or disorder local to the site.	
		B.Number of Council records of complaints of excessive noise arising from the site.	
28	264 Englishcombe Parish Council	EPC does not feel competent to give an opinion on this point.	
26	315	No	
	Charlcombe Parish Council		
30	1111 Compton Dando Parish Council	It would be useful to measure "churn" of traveller sites, in other words, how many unauthorised sites pop up because travellers are moved off of other unauthorised sites and do not have an authorised site to go to.	
15	1415 Peasedown St. John Parish Council	The amenities and facilities in a community to accommodate gypsies & travellers. e.g. school places, GP surgeries, adequate public transport. The length of time travellers stay on one site.	
17	2589 Bristol City Council	Neither the monitoring indicator for draft Core Strategy Policy CP11, the policy itself or the accompanying explanatory text appear to specifically set out any figures for pitch provision. It is considered that inclusion of a monitoring target with a reference to either the GTAA or the specific pitch requirements for 2011 would be more effective. It would be helpful if the indicator was broken down to reflect the former core output indicator H4 (e.g. a) permanent, b) transit, c) showpeople and d) total).	
25	2593	Family growth. The effect of education on the lifestyle of future generations.	
	Ms Judi Grant (Individual)		

42	2598	Is there regular usage of all current capacity? How many travelling children attend local schools? Indicating
	Keynsham Civic Society	commitment to site

Que	Question 4: Should the preferred approach be to allocate sufficient land to allow groups to live separately from each other?		
#	Respondent	Consultation Response	
13	96 Keynsham Town Council	No	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	Yes any approach based on one size fits all or forcing different groups to live together on one site is probably doomed to failure.	
27	246 Combe Hay Parish Council	YES – it is recommended that separate sites for Gypsies, Irish Travellers, New Age Travellers and Travelling Show People should be provided.	
32	257 Valley Parishes Alliance	We consider that, ideally, sufficient land should be allocated to allow groups to live separately from each other and that allowance should be made for future family growth, to avoid overcrowding.	
28	264 Englishcombe Parish Council	The cultures of these groups are fundamentally different; EPC would recommend sufficient land be allocated for these groups to live separately.	
26	315 Charlcombe Parish Council	Yes	
15	1415 Peasedown St. John Parish Council	No	
8	1555 Stowey Sutton Parish Council	We believe smaller sites are preferable to larger sites.	
41	2587 Children's Society	In our experience Gypsies and New Travellers would need separate sites as would not want to live together.	
17	2589 Bristol City Council	The identification of a range of site sizes to enable choice in terms of site provision is supported.	
25	2593 Ms Judi Grant (Individual)	Yes	

42	2598	Yes
	Keynsham Civic Society	

#	Respondent	Consultation Response
13	96 Keynsham Town Council	No
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	yes, in an ideal world this is a sensible approach allowing for expansion. However clearly there needs to a balance between the extremely difficult task of finding land for sites and providing for future expansion.
27	246 Combe Hay Parish Council	YES – within limits – perhaps limited to "close" family only – see also the response to Question 1.
32	257 Valley Parishes Alliance	We consider that, ideally, sufficient land should be allocated to allow groups to live separately from each other and that allowance should be made for future family growth, to avoid overcrowding.
28	264 Englishcombe Parish Council	Whilst EPC does not wish to see large sites being created, we do believe it would be prudent to make allowance for future family growth.
26	315 Charlcombe Parish Council	Yes – it makes sense to look ahead and anticipate family growth.
30	1111 Compton Dando Parish Council	Yes. The size of sites should be proportionate to the specific requirements of individuals or families.
15	1415 Peasedown St. John Parish Council	No
8	1555 Stowey Sutton Parish Council	Yes – up to a maximum of 5 extra pitches.
41	2587 Children's Society	In our experience Gypsies and New Travellers would need separate sites as would not want to live together.
25	2593	What is the authority's definition of 'a family'?

	Ms Judi Grant (Individual)	
		Smaller sites to accommodate family groups would seem less likely to cause difficulties than ones designed for multi-family occupation.
42	2598	No. Clear definition of family groups essential
	Keynsham Civic Society	

Question 6: What form of tenure do you consider would best suit the needs of the Gypsy and Traveller community in Bath and North East Somerset? Please give reasons.		
#	Respondent	Consultation Response
1	4 Mr Francis King (Individual)	The land must be publicly owned, particularly if the site is sensitive. Many people would like to live in the countryside, and if the general public think that the Gypsy and Traveller community is making something out of their tenure then there will be bad feelings.
13	96 Keynsham Town Council	Publicly owned and managed by a Registered Social Landlord or local authority. This will allow for better control of pitch allocation.
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	All three forms of tenure would meet needs of the different sections of the population. It is difficult for us to answer this in relation to BANES in particular as we lack the local connections necessary to draw a sound conclusion. We suggest that the council reaches out to the local travelling community in a positive and active way to help ascertain their views about their own needs. Failure to do this will inevitably result in problems with the wrong sorts of sites being provided for. C 1/2006 endorses this approach under the section Community Involvement and failure by councils to follow this course of action will inevitably render the consultation process unsound.
38	130 South Stoke Parish Council	The only Tenure which would appropriate for such sites would be some form of leasehold, with the Freehold to be held by the Council in all cases. This would facilitate ongoing control of such sites and remove the serious risk of exploitation of Site Tenants, which would otherwise exist.
20	188 Freshford Parish Council	As a preference the sites should be publicly owned so as to facilitate more open management and to emphasise the ongoing responsibility of the Local Authority.
27	246 Combe Hay Parish Council	First preference – Publicly owned and managed by a Registered Social Landlord or the Local Authority – because this form of tenure, being the most effectively managed, would ensure the most benefit to both the local settled community and to the Gypsies, Travellers or Travelling Show People concerned. Second preference – Owned by the Gypsies, Travellers or Travelling Show People themselves – because this form of tenure would provide considerable self-motivation for effective management.
		Third preference – Privately owned and managed and rented to Gypsies, Travellers or Travelling Show People – because this form of tenure might well be abused, to the detriment of the local settled community and/or to the Gypsies, Travellers or Travelling Show People themselves
28	264	EPC feels very strongly that the site(s) should be Publicly Owned. Managed and Maintained to the highest

	Englishcombe Parish Council	standards.
		We are in favour of site(s) when established being properly managed with on-site managers to ensure that this is achieved. In keeping with above a high standard of accommodation facilities needs to be established and maintained.
		There should be clear and enforceable (in law and via active police monitoring) terms and conditions of tenure, whether long or short term.
		As the community is obliged to provide these facilities, the Travelling Fraternity has to accept that it does have a duty of care and consideration to that community
26	315 Charlcombe Parish Council	It would seem likely that all 3 forms of tenure may be needed to meet the requirements of different groups, depending on their financial circumstances. The order of preference should be (1) Public ownership (best option), (2) Ownership by Gypsies/Travellers, (3) Private ownership (least attractive option).
30	1111 Compton Dando Parish Council	Authorised sites should preferably be owned and maintained by the local authority, BANES. This gives the local authority better visibility on the number of pitches, number of residents and any commercial activity.
15	1415 Peasedown St. John Parish Council	All three points on page 10 are valid and acceptable, as long as gypsies & travellers abide by the rules set by the local authority.
8	1555 Stowey Sutton Parish Council	We believe tenure should be with the local authority to ensure adequate controls are adhered to.
41	2587 Children's Society	A mix of all three. The needs of Gypsies and New Travellers are different. e.g. in Somerset New Travellers tend to live on privately owned sites. Gypsies tend to live in family groups.
25	2593 Ms Judi Grant (Individual)	Rental gives the community and the authority more flexibility of tenure and management. It would be difficult to restrict numbers, activities etc. if sites were owned.
42	2598 Keynsham Civic Society	Rental: purchas loses a) revenue b) control of capacity

Que	Question 7: In order to cater for a range of needs, do you consider a rural exception site policy is required?		
#	Respondent	Consultation Response	
13	96 Keynsham Town Council	No	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	Yes we think that rural exceptions policies are required in areas such as BANES. Circular 1/2006 recognises the difficulties which the Travelling community has in meeting its land requirements. We do have concerns about formal rural exceptions policies excluding persons with no local connection - given that BANES never made provision it could be argued that no local connection could exist in these circumstances. A preferred approach might well be the clear statement that sites are possible in the countryside given a shortage of suitable land elsewhere. In other council areas an approach consisting of a hierarchy of search which includes all land in ascending order of restriction.	
20	188 Freshford Parish Council	A rural exception site policy may be appropriate in certain limited circumstances but priority should always be given to brown-field sites or within existing settlement boundaries.	
27	246 Combe Hay Parish Council	NO – because of the potential for local resentment and conflict if land were to be allocated under a Traveller Rural Exception Site Policy in those instances where no land was allocated under an Affordable Homes Rural Exception Site Policy for those with close ties to the local settled community.	
32	257 Valley Parishes Alliance	Issue 3: Rural Exception Site We do not consider a rural exception site policy is required because B&NES must first establish that there is a lack of affordable land	
28	264 Englishcombe Parish Council	EPC is opposed to Rural Exception sites. We have significant concerns regarding how small sites of this description could and would be managed together with the potential for increased crime and disorder.	
26	315 Charlcombe Parish Council	Don't know.	
15	1415 Peasedown St. John Parish Council	No	
8	1555 Stowey Sutton Parish Council	We do not believe this to be necessary.	

41	2587 Children's Society	Yes. Currently there are no enough places for Travellers to stop and getting increasingly more difficult.
17	2589 Bristol City Council	Should there be a lack of affordable land to meet local Gypsy and Traveller needs, it may be necessary for a rural exception site policy to be established.
25	2593 Ms Judi Grant (Individual)	I am worried by this idea. Gypsies and travellers need to conform to the same legislation, bye-laws & planning constraints as the rest of the community.
42	2598 Keynsham Civic Society	Separate to keep legal and planning consent in line with rest of community

#	Respondent	ts and neighbours will not be compromised? Consultation Response
13	96 Keynsham Town Council	Yes
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	One would have thought that given the general opposition to sites which any location is likely to involve this would be an issue best dealt with at the planning application stage via a condition. To highlight it at an early stage in the selrction process could well be self-defeating.
38	130 South Stoke Parish Council	The Parish Council feels that it would be entirely inappropriate to allow any form of "Business Use" on any such site; particularly any that might be allowed within the "Setting of the WHC".
20	188 Freshford Parish Council	Yes
27	246 Combe Hay Parish Council	YES – see also the responses to Questions 3 and 11.
28	264 Englishcombe Parish Council	In theory such provision of mixed residential and business use makes a great deal of sense and EPC would support such provision. At the risk of being over sentimental, tradition country businesses would be welcomed, whereas activities such as scrap metal dealing and vehicle breaking must be totally barred together with any other antisocial activity.
26	315 Charlcombe Parish Council	Yes
30	1111 Compton Dando Parish Council	Yes, definitely. Mixed use sites should not be permitted in the green belt, only on brownfield sites.
15	1415 Peasedown St. John Parish Council	Yes, as long as travelling businessmen and women are given a timescale for staying.
41	2587 Children's Society	Yes. Important to consider safety for children on sites.

17	2589	Yes. This appears to be an appropriate approach.
	Bristol City Council	
25	2593	Yes.
	Ms Judi Grant (Individual)	
42	2598	No
	Keynsham Civic Society	

Que	Question 9: Are there any additional criteria that should be considered in selecting the best locations for Gypsy, Traveller and Travelling Showpeople?		
#	Respondent	Consultation Response	
11	23 Avon Wildlife Trust	In relation to Previously Developed (Brownfield) Land, the Trust welcomes this criterion but would wish to highlight that brownfield land can offer extremely valuable habitats for wildlife and this needs to be taken into consideration when assessing potential sites. The wording of this paragraph may need revising as it is not clear what 'untidy or derelict' land mean in this context.	
13	96 Keynsham Town Council	No additional criteria.	
6	102 Federation of Bath Residents' Associations	The document states "There is a general presumption against development that would be harmful to the Green Belt. As with housing provision for the settled community, in accordance with national planning policy, 5 Gypsy and Traveller sites are normally considered inappropriate development on Green Belt land". Does this apply also to World Heritage Sites?	
4	138 Mr Christopher Isaac (Individual)	 To be located away from residential areas, but nevertheless within the urban fringe, on sites that are: - not too large, easily serviced for mains water, drainage, etc, - easily accessible to main road structure - essentially secured, discretely fenced, with individual hard standings for caravans and, as required, communal toilet washing / drying facilities - and, being within the urban fringe, reasonably accessible to urban services, most particularly education and welfare 	
16	151 Dunkerton Parish Council	See our response to Q13 – there are specific local opportunities in B&NES that should be thoroughly articulated and analysed	
20	188 Freshford Parish Council	None come to mind	
27	246 Combe Hay Parish Council	NO.	
28	264 Englishcombe Parish Council	EPC has no further criteria to recommend. We strongly support the presumption against such sites in the Green Belt/AONB, including Brownfield Land within these areas.	
26	315 Charlcombe Parish Council	No	

30	1111 Compton Dando Parish Council	Sites should not be located within 1.5km of a conservation area.
15	1415 Peasedown St. John Parish Council	Page 11 covers all the necessities.
8	1555 Stowey Sutton Parish Council	Local public consultation should be an important criteria.
41	2587 Children's Society	Near health and education establishments.
17	2589 Bristol City Council	The criteria appear to be very comprehensive.
25	2593 Ms Judi Grant (Individual)	The same criteria as for others with a preference for brownfield sites. Difficulties of access for large vehicles and multi vehicle parking are major considerations i.e. hard surfaces and safety issues for the travelling community and locals (access etc)
42	2598 Keynsham Civic Society	Brownfield with sufficient vehicular access to suit all

Que	Question 10: Does the proposed site selection methodology and the range of factors to be considered provide a reasonable and robust means of assessing potential site suitability?		
#	Respondent	Consultation Response	
11	23 Avon Wildlife Trust	The Trust proposes that land covered by a national or local wildlife designation should not be considered at all for possible sites for the reasons outlined in Core Strategy Policy PC6 (as amended as at September 2011) referred to in our response to Q13 below.	
13	96 Keynsham Town Council	Yes	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	We have pointed out some of the problems associated with the proposed policy. We must stress very strongly that as it stands this sort of approach, especially in relation to accessibility to services and potential effects on amenity exclude otherwise suitable sites. A similar approach was taken by S Norfolk Council in their DPD and it was severely criticised by the Inspector and the DPD declared unsound and it was withdrawn. This sort of mechanistic approach simply does not work with too may sites excluded at an early stage of the selection process. Case law and C 1/2006 recognises that there are circumstances in which Green belt land may be suitable for use. The DPD seems to rule this out completely. We suggest that a fresh look is taken at the issue of how best to carry out site selection which takes account of the difficulty of finding sites which are available, affordable and appropriate. It is always a balancing exercise.	
20	188 Freshford Parish Council	No. Proximity to facilities is only one part of the process.	
27	246 Combe Hay Parish Council	YES – see also the response to Question 12.	
28	264 Englishcombe Parish Council	Subject to EPC comments in Q12, the proposed selection methodology and the range of factors to be considered do provide a reasonable and robust means of assessing potential site suitability. Providing the criteria for such site incorporates EPC Proposals in Q 6.	
33	279 English Heritage	English Heritage suggests that to enable the appropriate assessment of any potential significant impact on the historic environment, greater clarification needs to provided within the next version of the Plan than in the current draft, particularly in relation to the criteria in the scoring matrix. Often non designated heritage assets, and the impact on the setting of assets, in particular, can be overlooked when assessment methodologies are fairly broad, as your version currently is. It may therefore be useful for you to refer to PPS5 Planning for the Historic Environment to define the historic environment and how one might determine its relative significance.	
		Would development have an impact on any heritage asset, including its setting (note - important for DPD to	

		define HE)?
		What is the significance of the heritage asset affected?
		How significant is the impact?
		Could impacts be mitigated? If so what mitigation is required?
26	315	Yes
	Charlcombe Parish Council	
30	1111	Its a good approach, but there may need to be overriding factors, as in a numbers only approach, certain factors
	Compton Dando Parish Council	may cancel each other out. For example, in the matrix you show in the appendix, if a potential site were within 1.5 km of doctor, school, bus stop and food shop, and could be screened, these scores would wipe out the score against green belt location.
15	1415	Yes
	Peasedown St. John Parish Council	
8	1555	Yes.
	Stowey Sutton Parish Council	
41	2587	Yes
	Children's Society	
17	2589	Yes.
	Bristol City Council	
25	2593	Yes if the same rules are applied meticulously in all cases so that everyone concerned can understand that there
	Ms Judi Grant (Individual)	are no exceptions or 'favours'.
42	2598	Yes, it must be applied rigorously - even when officers change
	Keynsham Civic Society	

#	Respondent	Consultation Response
11	23 Avon Wildlife Trust	The criteria do not take into account priority habitats and species which are explicitly mentioned in the Core Strategy but not on page 12 of the DPD. This inconsistency needs to be resolved and taken into account in the DPD wording as in our response to Q13 below.
13	96 Keynsham Town Council	Yes, proximity of site to secondary school via a safe walking route.
16	151 Dunkerton Parish Council	See our response to Q13 – there are specific local opportunities in B&NES that should be thoroughly articulated and analysed
20	188 Freshford Parish Council	Account must also be taken of the capacity of – and physical access to - the school, surgery, shop etc
34	224 Bath Preservation Trust	In identifying sites in relation to Bath and its immediate environs, B&NES must be mindful of the Outstanding Universal Value of the World Heritage Site and its landscape setting, as well as the AONB, Conservation Areas, which should also be fully protected elsewhere. Sites should be chosen so as not to affect these adversely and should be effectively screened and landscaped in order to minimise the landscape impact.
27	246 Combe Hay Parish Council	 YES – the ability to impose Conditions of Planning Permission to include: a. The permitted hours of business activities. b. The permitted noise levels caused by business activities.
28	264 Englishcombe Parish Council	EPC has no further recommendations.
26	315 Charlcombe Parish Council	No
30	1111 Compton Dando Parish Council	Conservation areas
15	1415 Peasedown St. John Parish Council	See answer to question 9.

8	1555 Stowey Sutton Parish Council	The number of illegal encampments that are found.
41	2587 Children's Society	Put Travellers into the local community where they are able to be involved with local activities & become an integral part of settled community. Important for children to feel integrated
25	2593 Ms Judi Grant (Individual)	 Near public transport if travellers can be persuaded to use it (same applies to the rest of the population) Near doctors, dentists and health centres to promote regular healthcare and preventative medicine (long-term cost saving) As near to schools as possible to encourage regular attendance and less demand for L.A. tutors, also an understanding of environmental issues, the law, health and how the settled community functions.
42	2598 Keynsham Civic Society	Avoiding sites of statutory designations

Que	Question 12: Are the scores and weighting set out in the scoring matrix appropriate? Should any of the criteria be scored differently?		
#	Respondent	Consultation Response	
11	23 Avon Wildlife Trust	The Trust is very concerned that if this scoring approach is used, scores for local sites which are valuable for wildlife are equal in value to, for example noise issues which are not insurmountable and can be easily overcome. In addition, a site with important wildlife value may have an overall positive score from other factors which may mean that the wildlife value is downgraded compared with these factors.	
13	96 Keynsham Town Council	The scoring and weighting is fine.	
38	130 South Stoke Parish Council	Whilst the legislation appears to make it clear that Green Belt Areas & AONBs are to be avoided, the proposed "Weighting" for a balanced assessment, as a test against actual harm that might occur is far too lenient. Bath is a World Heritage City and the weighting targets should be considerably increased to take account of that.	
20	188 Freshford Parish Council	Green Belt weighting doesn't sufficiently reflect the statement that sites are normally considered inappropriate development on Green Belt land. We propose that development in the Green Belt should be weighted as follows: Yes: -20 No: 0	
34	224 Bath Preservation Trust	In relation to this, we wish to comment upon the scoring in Appendix B, which suggests comparative weighting of sites. Although sites outside of the green belt are scored positively, the scoring of allocation sites within the green belt with a zero suggests and implication that this would have a neutral impact. We consider that this is erroneous and should better reflect that sites within the green belt would have a detrimental impact upon the character and openness of the green belt. Additionally, though we understand that the AONB and SSSIs would fall under the "Jand covered by a national or local landscape or wildlife designation", we feel that this could be expressed more explicitly for clarity during the identification of potential sites. Policy HG16 of the B&NES Local Plan supports this position, and indicates that while rural sites are acceptable, they should not be located within an AONB or SSSI.	
		We also note that there is potential that brownfield sites could be submitted for consideration as allocated sites. The Trust welcomes development which makes efficient use of land and avoids development within the green belt; however, such allocations should not be made at the expense of prejudicing more permanent urban development of the site in future. This is a key concern within the Bath World Heritage Site, where the loss of brownfield development sites may undermine the capacity to meet housing targets within the existing boundaries of the city.	
35	245	We are pleased to see that both the DPD and Sustainability Appraisal highlight that Caravans and mobile homes	

	Environment Agency	intended for permanent residential use as classified as "highly vulnerable' in PPS25, and that therefore they should not be located in areas of high flood risk (Flood Zone 3).
		Given the above we note that the Site Selection Scoring Matrix does not currently include a criteria for flood risk. Rather than considering flood risk issues after the scoring system, we would strongly encourage that sites are reviewed in relation to the Flood Zone map at an early stage before the Scoring Matrix is applied. This will ensure that time and resource is not wasted in applying the Site Selection Scoring Matrix to sites which would be opposed in principle on flood risk grounds (i.e. because they fall within Flood Zone 3).
27	246	YES –
	Combe Hay Parish Council	
		a. The scoring for the criterion relating to the Green Belt should be amended to be -
		(1)Yes – Minus 10.
		(2)No – Plus 10.
		b.The criterion relating to designations should specify -
		(1)The Bristol/Bath Green Belt.
		(2)The City of Bath World Heritage Site.
		(3)The Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty.
		(4)Conservation Areas.
		(5)Sites of Special Scientific Interest.
		(6)Sites of Nature Conservation Importance.
		(7)Regionally Important Geological Sites.
		C.The criterion relating to hazardous places should also include wind turbine sites.
		D.The scoring for the criterion relating to hazardous places should be amended to be -
		(1)Yes (within 1000m) – Minus 10.
		(2)No (more than 1000m away) – Zero.
		E.The scoring for the criterion relating to access from the public highway should be amended to be - (1)Yes – Plus 5.
		(2)No – Minus 10.
		f. The scoring for the criterion relating to space on the site for parking and turning should be amended to be -

		(1)Yes – Plus 5. (2)No – Minus 10.
		 g.The scoring for the criterion relating to potential noise issues should be amended to be - (1) Yes – Minus 10. (2) No – Zero
32	257	Issue 5: Location of Sites
	Valley Parishes Alliance	We fully support the selection methodology and criteria, set out in sections 4.12 and 4.13. We have the following comments about specific criteria and associated matrix scores (Appendix B) -
		Green Belt
		We are concerned that the door has been left open for consideration of sites in the Green Belt. We support the score of +10 for sites which are not within Green Belt but recommend that sites within in Green Belt are scored at -10.
		Such an approach would be more in tune with B&NES' determination (refer B&NES September Council Meeting and subsequent correspondence with Core Strategy Planning Inspector) not to identify housing development in the Green Belt.
		National and Local Land Designations
		We assume that this criterion will include a consideration of whether a potential site lies within or not within the Mendips or Cotswolds Areas of Outstanding Natural Beauty. However, it is not clear whether Conservation Areas will be considered. We recommend that Conservation Area status should be a specific criterion, with scores of -10 and 0 for sites within and not within Conservation Areas respectively.
		Previously Developed (Brownfield) Land
		We envisage a potential conflict between "brownfield' land for Gypsy and Traveller Sites and similar needs for settled housing requirements identified in the Core Strategy. Has B&NES given any consideration as to how this potential conflict would be resolved?
28	264 Englishcombe Parish Council	In respect of the scoring and weighting in Appendix B, EPC would strongly recommend and support an increase in the weighting against such sites in respect of Green Belt, greater still AONB (which appears to have been overlooked) and in effective site screening; which EPC considers essential.
26	315 Charlcombe Parish Council	The matrix seems a practical way of assessing and comparing potential sites, and it is reassuring to see that both Green Belt and AONB considerations are given significant weight. However, as noted in our General Comments (14, below), existing Policy HG.16 implies that sites within AONBs and SSIs are not acceptable and

		therefore sites within such nationally designated areas should not be considered at all (ie there should be an explicit statement to this effect). Moreover, to properly reflect local and national planning policy, greater negative weighting should be given to Green Belt sites. It is also suggested that vehicular considerations probably need greater emphasis, given that travellers' sites usually seem to have large numbers of vehicles. Thus the provision of adequate space on-site for parking should attract a higher positive score or the lack of such space a higher negative score. The same applies to the adequacy of the existing road network to accommodate additional traffic movements.
29	372 Timsbury Parish Council	It is the opinion of Timsbury Parish Council that the weighting attached to non - Green Belt sites (+10 points) is excessive compared to the weighting given to other criteria.
30	1111 Compton Dando Parish Council	The weighting against green belt location is not strong enough. For example, in the matrix you show in the appendix, if a potential site were within 1.5 km of doctor, school, bus stop and food shop, and could be screened, these scores would wipe out the score against green belt location. There should be a strong assumption against green belt development, and more impetus for brownfield use
15	1415 Peasedown St. John Parish Council	Yes and no. Additional box accessing location of employment opportunities needed.
8	1555 Stowey Sutton Parish Council	We believe this to be adequate.
41	2587 Children's Society	Fine
17	2589 Bristol City Council	Although sites need to be near amenities, they do not necessarily have to be within 500m. Therefore, it may be beneficial to consider a more flexible approach to the consideration of the accessibility criteria.
42	2598 Keynsham Civic Society	Access to schools must be highest priority and weighting

Que	Question 13: Are there any other issues that the Council should take into account when preparing this DPD?				
#	Respondent	Consultation Response			
11	23 Avon Wildlife Trust	Core Strategy Policy CP11 referred to in the draft DPD section g states that 'the site should avoid areas at high risk of flooding and have no adverse impact on protected habitats and species, nationally recognised designations and natural resources'.			
		However, the proposed significant changes to the Core Strategy as at September 2011 (Policy CP6 (4) p117 of draft Core Strategy, change ref no PC88) states that 'new development will protect and enhance international, national and local sites and existing networks of valued habitats'			
		In addition, the DPD refers to 'national and local designations within B&NES will be summarised and the potential impact of any site allocations considered in the SA. Developments should have no adverse impact on protected habitats and species, and natural resources' p12.			
		The Trust considers that the DPD wording is therefore not clear whether it will take local wildlife sites into consideration and appears to be inconsistent with the relevant Core Strategy Policy proposed in the significant changes as at September 2011. We support the revised wording to the Core Strategy, which although due to undergo examination is clear and explicitly states the need for protection of local sites as well as national and international ones, and refers to the connectivity which is essential for wildlife to flourish.			
13	96 Keynsham Town Council	Details of reasonable commercial charges for pitches should be included.			
16	151 Dunkerton Parish Council	The DPD reads very well. But it reads very well as a paper that could have been written for any authority in the UK. B&NES has a particular opportunity that is conspicuous by its absence in the document: though section/para 5.2 refers in the general to "unused and surplus" public sector land, there is no reference to the MOD's imminent vacation of 3 large areas of B&NES real estate and the opportunity or intent to assess and/or earmark some of that now – as part of the extant MOD planning activity - to meet this urgent and legitimate need. There is a good opportunity here to demonstrate some joined-up government.			
20	188	Yes			
	Freshford Parish Council	(i) Areas such as AONBs, SSSIs etc should be spelt out and a suitable weighting allocated similarly to treatment of Green Belt in Question 12 above.			
		(ii) This whole consultation should be looked at in parallel with current consideration of the problems posed both by and for canal users without home moorings (including New Travellers) who rely on local facilities such as schools, surgeries, shops etc.			

34	224 Bath Preservation Trust	We also are mindful of the differences that may be required in allocating sites for Travelling Showpeople. We make no comment upon any cultural differences between groups, though we suggest that Travelling Showpeople necessarily have a different pattern of occupation and activity which should be borne in mind when allocating sites. We also note that this document does not address requirements or site allocations of appropriate sites for travelling boat people. We suggest that it would be wise to consider allocations or strategies to address their needs without having an adverse impact upon the landscape or appearance of the river Avon or the Kennet and Avon Canal.
27	246	YES – review each authorised site every 5 years, taking into account -
	Combe Hay Parish Council	
		a.Number of Police records of crime and/or disorder local to the site.
		b.Number of Council records of complaints of excessive noise arising from the site.
		c.Number of Council records of complaints of excessive lack of cleanliness (as specified in the Environmental Protection Act 1990).
		d.Number of Police and Council records of Road Traffic Accidents or Collisions in the vicinity.
28	264	EPC has no further recommendations.
	Englishcombe Parish Council	
21	286 Horseworld	Historical evidence reveals the cultural significance of the traditional keeping of horses amongst the traveller community. Animals are bought and sold within the community both in the UK and Ireland, many changing hands at fairs and sales and transiting through the Ports. Animals are imported from Belgium and Holland as "trotters" and these are routinely raced to support gambling on an extensive scale.
		A traveller family may own as many as 150 horses at any time and lack of consideration of these numbers when considering site allocations often gives rise to issues, both in terms of welfare and the wider legal implications which may arise.
		Many traveller horses, of necessity, are left to illegally graze development sites, factory sites, school playing fields, inadequately secured farm land or road-side areas where they represent a danger to the public as well as to themselves. They also give rise to numerous complaints to the Police from members of the public concerned for their safety and welfare. Roaming horses demand a high level of Police time and rounding-up and securing is a high maintenance, technical and costly exercise for both the public purse and welfare charities.
		When considering land for the grazing of horses, the Equine Industry Welfare Guidelines Compendium for Horses, Ponies and Donkeys (Third Edition) recommends that "Horses generally require a minimum of one acre (o.4 hectares) per animalAn allowance of 2 acres per horse can provide reasonable space for the animal's full requirements".

		In addition, every horse must have "free access to a supply of fresh clean drinking water" and "pasture should be properly fenced to confine horses".
		Ground breaking work is being undertaken at the present time with South Gloucestershire Council on methods of improving traveller equine welfare. Assistance with negotiations as to long term rental of grazing land adjacent to approved sites is being provided to both Local Authority and Traveller community. With a view to containing animals near to their owners in properly fenced and managed land this represents a determined attempt by the equine welfare organisations to work hand in hand with public authorities and traveller communities to satisfy the needs of all groups together with those of the public.
		World Horse Welfare, RSPCA and HorseWorld have formed a joint initiative to support and advise the traveller community on improvements to equine welfare. Designed to assist and also reduce the instances of equine welfare issues, this initiative consists not only of providing facilities for legalising animals (through micro-chipping and passports) but also welfare improvements (worming and condition-checking) and the education of traveller young people in enhanced welfare issues in keeping with acceptable modern practice.
		As the professional bodies most closely concerned with traveller equine welfare we would strongly advise that when preparing the DPD, B&NES should take into account the long-term effects of the traveller community tradition of the keeping of extensive herds of horses and make substantial and long-term provision for this when determining designated traveller sites. In our view this accords with best practice and can contribute to the on-going general good of both traveller and non-traveller groups and assist in the promotion of good community relations.
		The expert advice of our three charities is offered to the Council in the undertaking of the DPC and we would welcome the opportunity of contributing to the long-term strategic planning as part of our on-going commitment to the promotion of good equine welfare and in keeping with our obligations to the wider community.
26	315 Charlcombe Parish Council	No
30	1111 Compton Dando Parish Council	How to monitor ongoing development, or "site creep", where sites become overcrowded or used for commercial purposes after the initial site is authorised. Its not clear how this could be achieved.
15	1415 Peasedown St. John Parish Council	Location of gypsy and traveller sites previously used in B&NES.
41	2587 Children's Society	We think they need to consider how children & families can be supported in entering education and becoming part of the local community. Maybe council could consider raising awareness of Traveller lifestyle which we are

		able to offer. We would be happy to promote awareness raising of Traveller lifestyle to any organisation appropriate
17	2589 Bristol City Council	The issue of deliverability of individual sites should also be addressed through the site assessment process.
25	2593 Ms Judi Grant (Individual)	Try to include the Gypsy & Traveller community in some decision-making wherever possible.

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Question 14: Do you have any other general comments on the Issues and Options Report? Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.		
Respondent	Consultation Response	
4 Mr Francis King (Individual)	Gypsy and Traveller sites need to have an address so that members of the community can receive help towards the rent of the site, if they do not have an independent income. The sites should pay for themselves. A full provision of facilities should be provided and maintained, and a council official should be made responsible for the upkeep of the sites.	
86 Whitchurch Parish Council	The members of Whitchurch Parish Council feel they are unable to give an authoritative reply to the above document due to the lack of specific information provided.	
95 The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	
96 Keynsham Town Council	No	
111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	 As well as responding to the posed questions we think it worthwhile to respond to draft policy CP11 (which we may have responded to at an earlier stage). We have some concerns about a number of the criteria listed. In particular: 1. The accessibility criteria (a) are far too tightly and unreasonably and unrealistically drawn. They will exclude many potential sites and neglect to balance land availability and suitability against access to services. A recent Inspectors report on the Rugby Core Strategy addressed this issue and made comments which support our contention. We quote: 	
	132. Sustainability is a cornerstone of the strategic Vision and Objectives of this CS. So locations in or near the most sustainable settlements in policy CS1 should be considered first. But this should not exclude the possibility of sites being found in the countryside. Nationally, many existing gypsy and traveller sites are in these locations for practical and affordability reasons, and it is unrealistic to seek to thwart provision in this way. Therefore, to be effective the policy should include this last possibility as part of a series of sequential locational criteria which match the hierarchy in policy CS1 in descending order of preference. This also means that the criterion that sites should be located within a defined distance of local services would be too restrictive, as it would make allocations and permissions to meet need unlikely in the countryside and so could result in an ineffective policy. 2. Criteria (e) and (f) relate to impact on character, appearance and amenity. The requirement that no harm or	
	and local policies, go Respondent 4 Mr Francis King (Individual) 86 Whitchurch Parish Council 95 The Coal Authority 96 Keynsham Town Council 111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform	

		bermful impact is upreclictic and an energinvitation to NIMDV chiestions. These two pritoric are wrecelletic and
		harmful impact is unrealistic and an open invitation to NIMBY objections. These two criteria are unrealistic and will undoubtedly mean that otherwise suitable sites could be rejected because of local opposition which could well be based in prejudice. The Council should be mindful that the main barrier to the construction of Traveller sites is public and official prejudice.
38	130 South Stoke Parish Council	The Parish Council is clear that it is necessary and imperative under current Government legislation to make correct and adequate provision within each Local Council area for Gypsies and Travelling People.
		In addition the Parish Council notes that the provisions of the Act make it clear that there is an inbuilt presumption against locating site allocation inside Green Belt Areas or AONBs. Because Bath is a World Heritage City this prohibition should be deemed to exist in any area within the "Setting" of the WHS which is not already covered by these designations.
		It should be quite clear in the Development Plan Document that provision for such sites within these areas could only be justified if "very special circumstances" could be proved to exist which would outweigh any potential harm that might be caused.
14	142 Mrs Diana Francis and Mr Nicolas Francis (Individuals)	Your consultation document and response form include too many technicalities for us! All we would like to say is that we hope Bath & North East Somerset Council takes its responsibility in this matter seriously on behalf of its citizens, and we warmly support moves to provide permanent and transit sites for Gypsies and Travellers.
9	152 Corston Parish Council	Please note that the Corston Parish Council debated the subject at their meeting on 7th December and were unable to identify any suitable permanent or transit sites for Gypsies, Travellers or Travelling Showpeople within the Parish of Corston.
37	162 Batheaston Parish Council	Policy Background The draft DPD refers to the national policy background and advice on gypsy and travelling showpeoples' development in DCLG Circulars 01/2005 Planning for Gypsy and Traveller Caravan Sites and 04/2007 Planning for Travelling Showpeople respectively, as well as the DCLG current draft Planning Policy Statement Planning for Traveller Sites.
		In terms of the requirements for acceptable sites we find the draft DPD consistent with the national principles of site location and also with Policy CPU of the draft Core Strategy of the Bath and North East Somerset Local Development Framework.
		To that extent we support the draft DPD and our representation is confined to observations on the search for specific sites.
		Relevance to Batheaston Parish
		At this stage it is not clear whether the Unitary Council's statutory responsibility for the planning control of sites or

	462	any part of that duty would pass to Parish Councils under the forthcoming Localism arrangements. Were that the case, Parish Councils would be likely to need recourse to professional and legal advice on a scale and at an expense not previously required of them. Our representation is therefore restricted to observations on defining specific sites. Statutory Site Allocations The failure of B&NES to provide sites appears to be an operational policy inherited from the former Avon County Council which resolved 'not to harass' gypsies even when there was a statutory duty of provision.
22	163 The Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on further planning policy documents.
19	197 Railfuture Severnside	Rail future has no objection in principle to sensibly located permanent and temporary sites for Gypsies, Travellers and Travelling Showpeople within Bath & North East Somerset.
		Our main concern is that land for potential railway stations might possibly be lost if future transport needs were not adequately considered during the selection of sites. My organisation supports local aspirations for station reopenings at Bathampton, Radstock and Saltford, as well as the comments by Councillor Symonds that the future for transport in Bath & North East Somerset lies in greater use of the rail network I also understand that the West of England Partnership's Joint Transport Executive has identified a number of locations for additional stations on the Great Western main line and has asked Network Rail to safeguard land so that these could be opened during or after electrification.
		We welcome the statement made in Appendix B (Draft Site Selection Scoring Matrix) of the Consultation document which says that reducing reliance on car travel is an important objective of local and national policy. We are pleased that this Appendix includes railway stations within the definition of Public Transport Nodes. Where we see possible cause for concern are the comments in para. 4.12 that national planning policy also favours the use of previously developed or derelict land. There is a danger that potential station sites might be lost through short term expediency (the need to establish Gypsy & Traveller sites fairly urgently) taking precedence over longer term requirements for transport infrastructure.
		Railfuture's response to your Council's Core Strategy Consultation in February 2011 asked for safeguarding of disused railway formations which have potential for reinstatement in the long term, given the need for transport systems to become less dependent on imported oil. We also said that because Bath attracts visitors from all over the world, it needs to expand long distance public transport (ie rail services) rather than rely almost totally on buses as was implied in the Core Strategy. We therefore welcome the Council's decision to remove the proposed busway on the former Midland Railway route from the Bath Transportation Package. We have argued for reinstatement of the railway between Radstock and Frome in order to boost Radstock's economy and

	particularly to attract visitors to its industrial heritage. It would be a great loss to Bath & North East Somerset if the possibility of a larger railway system were to be compromised by the erection of permanent Gypsy & Traveller facilities (or indeed any other buildings) on these linear sites.
224 Bath Preservation Trust	With regard to the above draft policy consultation, the Trust would like to provide a general response. Bath Preservation Trust recognises the requirement for policy addressing the needs of gypsies and travellers. We further believe it is essential that suitable sites for gypsies, travellers and travelling showpeople are identified and established, in order to avoid the setting up of unauthorised sites which are then difficult and expensive to remove and restore.
246 Combe Hay Parish Council	YES – a.Policy HG.16 in the B&NES Local Plan (adopted October 2007) is recognised and supported.
	 b.Policy CP.11 in the B&NES Core Strategy (currently under Examination) is recognised and supported. c.The production of a Gypsies, Travellers and Travelling Show People Site Allocations Development Plan Document is most strongly supported.
	d.The requirement to provide, in the first instance, 22 permanent and 20 transit pitches is recognised and supported.
	e.Attention is drawn to the Secretary of State, Communities and Local Government's decision (reference APP/B1930/A/11/2153741/NWF dated 15 December 2011) relating to the permanent site in the Green Belt near Redbourn, Hertfordshire, particularly regarding the weight given to Circular 1/2006, the draft PPS "Planning for Traveller Sites" and the draft National Planning Policy Framework. This decision is identified in the Planning Portal News dated 6 January 2012.
250 Somerset County Council	thank you for consulting Somerset County Council on the above document. Please note that we have no comments to make from a strategic planning perspective.
257	Introduction 1.2
Valley Parishes Alliance	We welcome the two stage approach of an initial consultation on criteria for site selection and second consultation to look at preferred site options which meet those criteria.
	Planning Policy Framework 2.7 & 2.8
	We welcome the application of Policy HG.16, particularly provisions i to v, as the main policy against which applications for development will be assessed, prior to adoption of the Core Strategy and the application of Policy CP11 as the main policy against which planning applications will be considered once the Core Strategy has been adopted. In particular, we commend the criteria (a-g) set out on page 6.
258 Ms Pamela Smith (Individual)	I am a travelling boat dweller living on the Kennet and Avon Canal without a permanent mooring. In April 2009 the DCLG confirmed to the National Bargee Travellers Association that bargee travellers, that is, boat dwellers without a permanent mooring, could be classed as Travellers for the purposes of Section 225 of the 2004 Housing Act.
	Bath Preservation Trust 246 Combe Hay Parish Council 250 Somerset County Council 257 Valley Parishes Alliance 258 Ms Pamela Smith

		As such, the accommodation needs of travelling boat dwellers without a permanent mooring in Bath and NE Somerset on the Kennet and Avon Canal and the River Avon ought to be considered within the Site Allocations Development Plan. Please could you inform me what plans Bath and NE Somerset Council has to assess and meet the accommodation needs of travelling boat dwellers either within this consultation or seperately.
28	264 Englishcombe Parish Council	EPC has no further comment to make in respect of the issues listed, but is concerned that a close watch be kept on possible crime and disorder implications.
26	315 Charlcombe Parish Council	The document is clearly set out, well-structured and easy to read. Our one overriding concern is that the paper does not fully reflect Policy HG.16 of the Local Plan in relation to nationally designated areas (AONB and SSI). HG.16 makes clear that sites are not acceptable in AONBs and SSIs:
		"Green Belt policy as set out in PPG2 is restrictive and sites would therefore normally be inappropriate in such locations. Rural sites may be acceptable if they do not lie within AONBs nor SSIs"
		As a Parish lying entirely within the Cotswold AONB, Charlcombe Parish Council would wish to see HG.16 properly reflected in the paper and in the resulting policy, making it clear that sites will not be considered within nationally designated areas (AONB, SSI). It is also suggested that the negative weighting given to Green Belt sites should be increased better to reflect PPG.2 and HG.16.
		Finally, it is suggested that all sites should be subject to periodic review for issues such as levels of crime/disorder, noise, adequacy of on-site parking and impact on existing road networks, for example every 5 years, and that the results are used to refine the policy as necessary.
29	372 Timsbury Parish Council	Timsbury Parish Council supports the the introduction of strong criteria to identify potential sites.
30	1111 Compton Dando Parish Council	Compton Dando Parish Council broadly support the report, and certainly support the drive to provide authorised sites.
		We agree that sites should be within 1.5km of essential facilities, but also that sites should not be in green belt locations. We agree that brownfield sites should be used wherever possible, especially for mixed use sites.
		Once authorised sites are provided, we would like to see enforcement against unauthorised sites become faster and more rigorous.

		We support the local authority in seeking to provide appropriate, stable, and safe sites for Gypsies and Travellers to settle in, while not disadvantaging local residents, and avoiding tensions with existing settled communities.
12	1347 Monkton Farleigh Parish Council	From time to time we are troubled by such visitors and we wish to make it very clear that we have no interest whatsoever in potential sites and would actively discourage their presence in this Parish.
23	1366 Network Rail	Upon the review of this document, Network Rail has no comments to make on the above and also to confirm we have no sites to promote within the Bath & North East Somerset area.
15	1415 Peasedown St. John Parish Council	All approved sites should meet planning regulations.
8	1555 Stowey Sutton Parish Council	We would like to stress the importance of consultation with parish councils and local residents.
5	2584 Mr Peter Strawbridge (Individual)	Surely providing "permanent" sites for "travellers" is a contradiction in terms! Any permanant sites for the "travelling" community should be exactly that - short stay (say 4 weeks maximum), and should be policed as such. Costs of clean-up, repair and vandalism re-instatement should also be levied, so that these sites are not a burden on the tax-paying residents of Bath.
41	2587 Children's Services	We have links with the current Traveller site at Newbridge. We are able to offer consultation with the children around views of Traveller sites, potential sites, we have over 20 years experience of working with Gypsy and Traveller families.
17	2589 Bristol City Council	Table 3.2: Please note the requirement for Travelling Showpeople plots for Bristol for the period to 2011 shown in Table 3.2 is incorrect. The figure should read 8 plots (not 11 as stated).
25	2593 Ms Judi Grant (Individual)	I feel strongly that Gypsy & Traveller communities have the right to follow their way of life but not a right to ignore the law and restrictions which the rest of the population have passed and support for the welfare and wellbeing of the whole community.
		After completing this form, I have read the leaflet and now see how the figures of 22 permanent and 20 +1 transit pitches are arrived at. It is extremely difficult for a lay person to make sense of parts of the main document.
40	B&NES Waste Services (Internal)	We would suggest a change to this Core Strategy Policy CP11 on page 6 (being brought forward from the Local Plan):
		e adequate services including utilities, foul and surface water and waste disposal can be provided as well as any necessary pollution control measures
		I

		I take this to be aimed at household (domestic) waste and think it should say something along the lines of – suitable for access to and participation in the Council's household waste and recycling collection services and the household waste recycling centres.
		That may not fit in the bullet as written so the words could be changed or made into a separate sentence perhaps? I haven't gone into detail about things like placing waste and recycling at the edge of property (next to public highway), containers to use etc – the most up-to-date information will always be on the website.
		I've also noticed though the reference to "any commercial activity if required" in bullet point c. Any waste produced as a result of that would not be classed as household waste and there's various waste legislation around the producer's duty of care on collection/disposal, and businesses have to pay for those services.
		That's not really related to site selection as such and I don't know what commercial activity might be envisaged but bullet point c would probably cover enough in terms of physical access for the right sorts of vehicles and trade waste storage space. Unless you wanted to be more specific and add " and any related non-household waste collection and storage" after commercial activity.
42	2598 Keynsham Civic Society	Keynsham Civic Society always fights to protect our green belt

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Que	Question 15: Do you know of any land in the District that, based on the criteria set out above, may be suitable, available and deliverable to provide Gypsy and Traveller pitches or a Travelling Showpeople yard? If so, please complete the accompanying form as fully as possible.		
#	Respondent	Consultation Response	
18	50 Saltford Parish Council	Saltford is a small parish with the village surrounded by the Bristol/Bath Green Belt. The DPD states that Gypsy and Traveller sites are considered inappropriate development on Green Belt land.	
		B&NES' Core Strategy does not include Saltford as a village suitable for any development due to the lack of available land within the village.	
		There are no existing unofficial Gypsy and Traveller sites.	
		In the context of the above, there are no sites within Saltford Parish that fulfil the site selection criteria proposed within the DPD.	
31	111 FFT Planning (Friends, Families and Travellers and Traveller Law Reform Project)	We are not in a position to suggest any sites lacking the needed local knowledge. We suggest that outreach is undertaken to the local Travelling community and that also Gypsies and Travellers in adjoining districts are alerted to the call for sites given that many may have local connections with the Travelling community in BANES.	
37	162 Batheaston Parish Council	There are no sites occupied by travelling showpeople in Batheaston and we are unaware of any demand for them. Save for the former unauthorised incursion on land at Charmy Down there is no recent nor current evidence of gypsies resident in the parish.	
		Having reviewed the area of this parish in response to this current consultation and mindful of the stringent planning constraints on development around the village we consider there are no sites within or around it where the requirements set out in the draft DPD for acceptable gypsy sites could be met.	
20	188 Freshford Parish Council	Freshford's Parish Plan (2008) and parish-wide surveys have identified the need for affordable housing. The so far unsatisfied search for suitable land to meet these needs must remain our continuing priority	
27	246 Combe Hay Parish Council	NO – every parcel of land in Combe Hay Parish which might be a potential, sustainable, Gypsies, Travellers or Travelling Show People site has been "scored" using the (amended) matrix – it is concluded that every such parcel of land is not suitable for such allocation.	
32	257 Valley Parishes Alliance	We are not aware of any privately owned land within the six B&NES parishes in the VPA that may be available and deliverable to provide Gypsy and Traveller sites or a Travelling Showpeople yard.	

28	264 Englishcombe Parish Council	EPC has no suggestions for possible sites.
23	1366 Network Rail	Upon the review of this document, Network Rail has no comments to make on the above and also to confirm we have no sites to promote within the Bath & North East Somerset area.
7	2241 Dr A E Neill and Mrs S Neill (Individuals)	I am reliably informed that a site to the west of Twerton is not unfavourably viewed by the Twerton community. Such a site has a great deal to commend it in terms of access to and facilities of, an urban centre in my view and should be pursued.
36	232 Compton Martin Parish Council	Whilst we cannot comment on available land in the District we have looked at the Parish of Compton Martin and can confirm we cannot identify any land which would be appropriate for this use.