

## Bath & North East Somerset Council

MEETING:	Planning, Transport & Environment Policy Development and Scrutiny Panel
MEETING DATE:	23 <sup>rd</sup> August 2012
TITLE:	Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD): Responses to Consultation and Issues Arising
WARD:	ALL
<b>AN OPEN PUBLIC ITEM</b>	
<b>List of attachments to this report:</b>	
Appendix 1: Summary of key issues arising from public consultation	

### **1 THE ISSUE**

- 1.1 The Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (DPD) is a formal planning document being prepared by the Council which will allocate land for the development of authorised Gypsy and Traveller pitches and a Travelling Showmen's yard across the District. Bath and North East Somerset Council does not have any permanent sites for Gypsies, Traveller or Travelling Showpeople.
- 1.2 This report highlights the key issues arising from the recent consultation and outlines the work being carried out as part of the next stage in the preparation of the Plan.

### **2 RECOMMENDATION**

The Planning, Transport & Environment Policy Development and Scrutiny Panel is asked to comment on;

#### 2.1 the scope of the stock take / review which entails:

- responding to the issues arising from the Preferred Options consultation;
- the ongoing review of the 6 sites previously consulted on;
- assessment of new sites suggested through the Call for Sites;
- an update to the assessment of need for pitches;
- liaison with Neighbouring Unitary Authorities on a sub-regional approach for identification of Gypsy & Traveller sites;
- a review of the site selection process.

- 2.2 The revised programme for the Gypsy & Travellers DPD (see para 4.7 below) including the intention to consult on the results of 2.1 above before preparing a Draft Plan.

### **3 FINANCIAL IMPLICATIONS**

- 3.1 The review of the existing 6 sites, the assessment of additional sites and the update of the Gypsy, Traveller and Travelling Showpeople Accommodation (And Other Needs) Assessment (GTAA) will utilise resources and budgets allocated for the LDF preparation. The costs are substantially covered by the existing budget although there are some additional costs arising from the 'stock take', primarily for the Needs Assessment update. This will necessitate a review of the LDF work programme and the Local Development Scheme.
- 3.2 The progression and eventual adoption of the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD will demonstrate the Council's commitment to the provision of sites to meet local need. The allocation and development of sufficient permanent and transit pitches will also enable the Council to redirect households travelling through the District to legal transit site(s).
- 3.3 It is recognised that there will always be Gypsies and Travellers who cannot provide their own sites and as such it is considered that socially rented pitches should be provided as part of the overall pitch requirement for the District. As a number of the preferred sites are publicly owned the Council has the option to ultimately offer that land for sale to private individuals or Registered Providers who may wish to develop and manage those sites. The Council also has the potential to develop and run sites itself which would have ongoing resource and financial implications.
- 3.4 The Council does not at this stage need to determine which, if any, sites it would wish to make a commitment to developing itself. In the event that Local Authority land is taken forward for allocation, there will be financial implications. Quantifying the cost of developing and maintaining sites will be more appropriate at the Draft Plan stage, at which point final site allocations will be determined. The Council will then be able to commence the process of making formal decisions as to whether it will take responsibility for individual site development, to sell or lease sites within its ownership to third parties for development and/or maintenance, including through the set up of Community Land Trust(s), or to seek to purchase land for development.
- 3.5 The Council agreed at its 14 February 2012 meeting to make a £1.8m capital budget provision to provide a site for Gypsies and Travellers, subject to detailed project plans being submitted once appropriate sites are identified through the planning process. It should be noted that grants, including the DCLG Traveller Pitch Funding, are available to fund the provision of pitches and that additional pitch provision is eligible for New Homes Bonus.

- 3.6 The update of the GTAA is underway and the results are anticipated to be available in late 2012. Further work on the Site Allocations DPD is in part dependent on the results of the GTAA, insofar as the need for pitches may rise or fall and require a commensurate number of pitches to be identified, assessed and allocated.

#### 4 THE REPORT

- 4.1 In response to the obligation on the Council in the National Planning Policy Framework (NPPF) and its accompanying document Planning for Traveller Sites (March 2012) to identify land for the development of residential accommodation for Gypsies, Travellers and Travelling Showpeople, and also transit pitches, to meet the need identified in Bath and North East Somerset the Council undertook consultation on an Issues and Options document between 21 November 2011 – 16 January 2012. A Preferred Options document was consulted on between 23 May – 20 July 2012.

##### *Stock take*

- 4.2 The Plan is still in its preparatory stages (Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012/767). As a result of the issues raised during the public consultation and also because of the further work required on the Core Strategy (see elsewhere on this agenda), the Council is undertaking a review or stock take of the work so far. This entails;
- a) Ongoing Review of the identified sites;
  - b) Assessment of new sites suggested through Call for Sites, including a review of existing unauthorised Gypsy and Traveller sites;
  - c) Review of the site selection process;
  - d) review of major development sites to assess as part of the Core Strategy review to assess opportunities for gypsies and traveller sites
  - e) Review of capacity outside the Green Belt, including in neighbouring local authority areas;
  - f) Update of the needs assessment to establish a 5 and 10 year supply of sites in accordance with Planning for Traveller Sites; and
  - g) ongoing liaison with adjoining authorities on opportunities for site provision in accordance with the duty to cooperate.
- 4.3 Part of the stock take will be a review of the site selection process in light of the concerns expressed over the previous methodology through the public consultation.

##### *General Issues arising from the consultation*

- 4.4 Over 1000 responses were received to that consultation, including a number of petitions. **Appendix 1** sets out the key issues arising from the public consultation. Of the non site-specific issues identified by

the consultation responses, there was general consensus that whilst sites should be identified for the Gypsy and Traveller community, those sites should be found in the most sustainable locations, preferably on brownfield land, near services, facilities and other amenities, including public transport.

- 4.5 Many respondents drew attention to the apparent inconsistency in the application of the site selection methodology leading, in their view, to the erroneous selection of preferred sites, and their view that the matrix scoring system was flawed with incorrect weightings used. A significant proportion of respondents considered that insufficient regard had been given to national guidance in the National Planning Policy Framework (NPPF), 'Planning for Traveller Sites', nor the criteria in Local Plan Policy HG.16 and emerging Core Strategy Policy CP11 in the selection of sites. There was also an overarching concern that sites had been identified in Green Belt locations given that Gypsy and Traveller sites would constitute inappropriate development in the Green Belt (as set out in Planning for Traveller Sites) but exceptional circumstances had not been properly demonstrated.
- 4.6 Some respondents felt it important that the Accommodation Needs Assessment is reviewed to provide an up to date evidence of need, in accordance with Planning for Traveller Sites policy. Many respondents also raised concerns with the consultation process, noting that they felt that communities affected by the proposals should have been consulted on the proposed sites much earlier and that the consultation had not been sufficiently advertised.

*Site-Specific Issues arising from the consultation*

- 4.7 The main issues arising from each site have been summarised and are also set out at **Appendix 1**. In brief, those main issues include site-specific highway concerns, impact on ecology, site size overwhelming the local community, site not on a recognised traveller route, access to local services and facilities, impact on tourism, and heritage issues.

*Review of the existing sites options*

- 4.8 Ongoing review is underway of the 6 identified sites and this includes undertaking the further work highlighted in the published Detailed Site Assessment Report and also in response to consultation responses. This includes assessments on highways, ecology, contaminated land and heritage. This work will inform decisions on which sites are deliverable and developable and should be taken forward to the Draft Plan.
- 4.9 The council has acknowledged and corrected two material errors in the consultation document, namely the incorrect boundary line around sites GT.14 land near Ellsbridge House, Keynsham and the

reference to Parcel 7100 Woollard lane, Whitchurch as brownfield when the entire site is a greenfield site.

*Additional sites arising from Call for Sites*

- 4.10 A number of new sites have been suggested to the Council for investigation in response to the Call for Sites held during the Options consultation. In some cases the exact site location of the site needs to be verified and the site owners are also being contacted. These sites will be listed in the report to Cabinet on 12/9/12 but might also be available in time for the Panel meeting if the necessary information is finalised in time. for the

*GTAA Update*

- 4.11 Planning for Traveller Sites states that local authorities should maintain an up-to-date understanding of the likely permanent and transit accommodation needs over the lifespan of the development plan. In order for the Council's Site Allocations DPD to be in compliance with this policy, the Council is commissioning an update of the Gypsy and Traveller Accommodation (And Other Needs) Assessment (GTAA). This will provide an up-to-date understanding of the current level of need for pitches and assist in planning for a supply of sites by calculating future need over the lifetime of the plan.

*Duty to Cooperate*

- 4.12 A further concern raised in representations to the recent consultation is the extent to which the legal 'duty to cooperate' has been satisfied. The duty requires local planning authorities and other public bodies to engage constructively, actively and on an ongoing basis when planning for strategic cross-boundary matters in the preparation of Local Plans (such as the Site Allocations DPD). The Council has had ongoing engagement with neighbouring local authorities on the preparation of the Needs Assessment as well as on meeting the accommodation need of the travelling communities. This will continue through the preparation of the DPD.
- 4.13 The Council has discussed with its neighbouring Unitary Authorities the possibility of joint working to update the evidence base in accordance with the Duty to Co operate, however those authorities are not in a position to update their evidence base as part of a joint study. Bath and North East Somerset; the Council will continue to share information about sites and needs with neighbouring authorities. In addition, B&NES will continue to co-operate with adjoining authorities on the strategy for site provision.
- 4.14 As a result of the further work now required on the Core Strategy, the stock take will include the assessment of options outside the Green

Belt to ensure suitable alternatives are explored. This includes discussions with adjoining authorities.

### *Timetable*

- 4.15 In light of the Core Strategy suspension, the Local Development Scheme is currently being reviewed which will align the programmes of Core Strategy and the Placemaking Plan with that on the G&T Site Allocations Plan. The proposed revised timetable is set out below:

<b>STAGE</b>	<b>DATE</b>
'Stock take' & New needs assessment	Now to December 2012
Consultation on results of stock take including new sites	February / March 2013
Consultation on Draft Plan	June / July 2013
Revise & submit Plan for examination	September–October 2013
Hearings	January 2014
Inspector's Report	March 2014
Adopt	May 2014

## **5 RISK MANAGEMENT**

- 5.4 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.
- 5.5 There is a risk that if the Council does not identify the necessary sites through the Development Plan process that there will be pressure for sites to be granted planning permission on an ad hoc basis or by appeal. Unauthorised encampment which has associated enforcement action costs is also likely to continue. Each of these outcomes are likely to have a detrimental effect on relationships between the settled community and travelling communities. A lack of authorised accommodation can also have negative effects on the welfare and social integration of Gypsy and Traveller families with the mainstream community which puts the Council at risk of failing to meet its Single Equality Duty.

## **6 EQUALITIES**

- 6.4 The statutory duties of the Council include the Single Equality Duty to eliminate discrimination, advance equality of opportunity and foster good relations between different groups in the course of developing

policies and delivering services. Gypsies and Travellers are recognised as distinct ethnic groups and are protected from discrimination by the Equality Act 2010.

- 6.5 An Equalities Impact Act has been completed. The key issue raised in that assessment is the need to engage with Gypsies, Travellers and Travelling Showpeople in the continuing development of the Site Allocations DPD.

## **7 CONSULTATION**

- 7.4 *Cabinet members; Overview & Scrutiny Panel; Section 151 Finance Officer; Chief Executive; Monitoring Officer*

## **8 ISSUES TO CONSIDER IN REACHING THE DECISION**

- 8.4 *Social Inclusion; Customer Focus; Sustainability; Property; Young People; Human Rights; Corporate; Health & Safety; Other Legal Considerations*

## **9 ADVICE SOUGHT**

- 9.4 The Council's Monitoring Officer (Divisional Director – Legal and Democratic Services) and Section 151 Officer (Divisional Director - Finance) have had the opportunity to input to this report and have cleared it for publication.

<b>Contact person</b>	David Trigwell: Divisional Director - Planning and Transport Development 01225 394125
<b>Background papers</b>	<i>Cabinet papers of 9 November 2011 and 9 May 2012 Issues &amp; Options paper Preferred Options paper</i>
<b>Please contact the report author if you need to access this report in an alternative format</b>	

## ANNEX 1: Summary of key issues arising through the consultation

### **A: SITE COMMENTS**

#### **GT.1 Parcel 7100, Woollard Lane, Whitchurch**

- Inappropriate development in the Green Belt, outside the Housing Development Boundary, not in keeping with rural location as previously confirmed through planning refusals
- object to doubling the size of a site which only has temporary planning permission which was refused on two previous occasions
- query why this site has been classified as a brownfield site as it is not previously developed
- increased traffic generated would add to road congestion and concern about the proposed use of the site for a travellers site on highway safety grounds
- concern that it is within 1000 metres of a high pressure gas pipe therefore in a hazardous location nor has land contamination been taken into account
- placing a site here would set a precedent leaving the way open to further expansion of the site

#### **GT.2 Old Colliery Buildings, Stanton Wick**

- concerned that the potentially affected communities were not made aware of the proposal much earlier in the process
- concern about inappropriate development in the Green Belt therefore contrary to Government policy and previous applications on the site have been refused on Green Belt grounds
- occupation of the site would dominate nearest local community at Stanton Wick and contrary to Government policy in 'Planning for Travellers Sites' which states that local planning authorities 'should ensure that the scale of such sites does not dominate the nearest community'
- concerned site does not meet the criteria set out in the DPD nor Policy CP11 yet was selected despite scoring low using the Site Selection Scoring Matrix.
- proposed site is not on a recognised traveller route and suggest this type of site is not one preferred by travellers as shown in the GTAA i.e. in close proximity to amenities and small family sites of up to 5 pitches
- ground stability, safety and contamination issues (arsenic and asbestos cited) associated with former mining operations on site not resolved, also reference to Sanctus Report (2010) which recommended costly remedial action to make the site safe, danger of further mine shafts collapsing (one capped recently)
- whether the site benefits from existing B2 use needs clarifying and which parts of the sites are considered 'previously developed' land
- Stanton Lane is very narrow with few passing places for vehicles therefore inadequate access to and into the site for travellers' caravans and trailers (reference to the planning refusal for expansion of Filers Coaches on adjoining site on traffic grounds)
- no suitable footpath along the lane and therefore dangerous especially for children
- site is remote from public services and community facilities and access to public transport which would increase the need to travel by car
- impact on availability of school places, resources and quality of education in local schools raised
- no mains sewerage at Stanton Wick and further development would place

- additional pressure on existing mains water with increased demand
- cost of providing necessary utilities infrastructure to service the site
- proposal would have a detrimental effect of the proposal on wildlife present on site (bats and other rare species)
- impact on tourism as proposal would have a detrimental effect on landscapes, countryside walks and local tourist related businesses
- mining heritage and industrial legacy of the Old Colliery Buildings, as highlighted in the Pensford Conservation Area Character Appraisal, has not been considered in the site selection process nor has impact on the Conservation Area been properly appraised.

#### **GT.4 Former Radstock Infant School Canteen**

- query raised the over the ownership of this land as there is an understanding the site was gifted by Lord Waldegrave in 1903 for the education of the poor in the area under the School Sites Act in 1841 and there is possibly “rights of reversion” where the land should have been returned to him when it ceased to be the site of Radstock Infants School in 2007
- site not suitable and far too small for two pitches - static caravan/trailers, mobile caravans, car amenity building, parking and manoeuvring
- traffic movements associated with the use of the site would further exacerbate existing traffic issues including narrowness of Bath Old Road and very tight blind bends for large caravans to negotiate
- safe access cannot be provided without loss of parking for residents in an already overcrowded road
- Bath Old Road used as a rat run and concerned proposal would exacerbate current traffic problems
- likely to have a negative impact on the local environment and the amenity of the adjacent land which could not be mitigated by screening
- proposed use of site not considered compatible with Conservation Area status
- concerns about the demolition of the historic boundary wall necessary to create an appropriate access to the site
- some community based development would be a better use for the site
- there is a need for more affordable housing in Radstock and it is noted this is part of a site identified in the Strategic Housing Land Availability Assessment as having the potential for 14 dwellings

#### **GT.6 Station Road, Newbridge**

- site is suitable as storage and possible workshop for maintenance work but with 3 pitches it could become very overcrowded
- query capacity of junction between Locksbrook Rd and Station Rd to accommodate typical vehicle types (wide/abnormal loads)
- concerns over increase in traffic and noise and the impact noise and nuisance from proposed business uses would have on the whole of Station Road
- concern over creating permanent residential site in a business park
- concern that site is in a residential area, immediately behind the gardens of a number of houses and would be located on a green area which is currently a local amenity
- proposal would exacerbate existing parking problems in the area arising from workers and residents competing for spaces
- suggest site is better used for additional housing with parking or small business use

- attention drawn to slow-worms living in this area

#### **GT.8 Lower Bristol Road, Twerton**

- as an existing tolerated encampment this site is the best place for the traveller community and should be taken forward
- with additional facilities would be ideal as it is close enough to a road for access although concerns expressed about children finding a safe route to local schools due to the busy road with no pedestrian crossing
- site has better transport links and access to nearby local families, services and other amenities than the more remote sites

#### **GT.14 Land near Ellsbridge House, Keynsham**

- proposed shared access onto this site and associated security issues
- relocation of the bus stop if a new access from the highway were to be created and the fact there is no existing boundary between Ellsbridge House and the site
- access to the site - reference to a previous planning application by Wansdyke Council (1980) on this site to store caravans that was withdrawn on the grounds access to the site was too dangerous
- potential loss of the wooded area if developed as is part of a green and wildlife corridor connecting Keynsham with agricultural land behind Pixash Lane and Worlds End Lane and it is understood there could be bats on the site - believe the woodland could be put to better use such as for outdoor learning and provides a visual screen to the industrial area to the north
- impact the proposal would have on Ellsbridge House a listed building and on the nursery as a business
- impact of the site if developed for proposed use on the open fresh water stream at the narrow western end of the site and possible contamination of the River Avon
- the boundary is inaccurately drawn in the Options document which would affect the area available for development

## B: RESPONSES FROM STATUTORY CONSULTTEES

Bristol City Council	<ul style="list-style-type: none"> <li>– no observations to make at this stage</li> </ul>
Coal Authority	<ul style="list-style-type: none"> <li>– for eventual site allocations include a criterion which assessed coal mining data to accord with NPPF guidance to ensure there are no mine entries or other coal related hazards which would require remediation or stabilisation prior to development</li> <li>– former mining activities and related hazards are not a strict constraint on development and potential sites should not be excluded from the assessment on the grounds of former mining legacy issues</li> <li>– also assess likely impact on mineral resources, including coal to ensure that any potential sterilisation effects are properly considered</li> <li>– these comments apply particularly to the Stanton Wick site, which is located in an area where past mining activity may present a risk to new development proposals and where surface coal resources are also present.</li> </ul>
English Heritage	<ul style="list-style-type: none"> <li>– it is not clear how assessment process has consistently applied the key planning issues across all sites particularly the effect of proposed site allocations on the historic environment.</li> <li>– Need further assessment of all heritage assets affected and how they contribute to the local area</li> <li>– clarify why sites in the AONB were rejected as a matter of course whilst those in the Green Belt, World Heritage Site (WHS) or adversely affecting a designated heritage asset were not</li> <li>– scoring matrix fails to give an appropriate weight to the consideration of heritage assets but process appears to have given greater weight to matters such as noise and overlooking and makes no reference to the impact on heritage assets other than the World Heritage Site or Conservation Areas</li> </ul> <p><u>Old Colliery Buildings, Stanton Wick</u></p> <ul style="list-style-type: none"> <li>– need to carefully consider historic and social significance of the colliery to ensure any future use of the site is sensitive to its cultural heritage value (reference to conservation of non-designated heritage assets Core Strategy Policy CP6 and NPPF).</li> </ul> <p><u>Former Radstock Infant School Canteen</u></p> <ul style="list-style-type: none"> <li>– report does not assess the significance of the building to be demolished as a heritage asset in a conservation area and how it contributes to the character and appearance of the conservation area or how any development in its place would preserve and enhance its character and appearance.</li> </ul> <p><u>Lower Bristol Road, Twerton</u></p> <ul style="list-style-type: none"> <li>– assessment exercise subject to an extensive evaluation of the impact on the natural environment but not the equivalent for the historic environment</li> <li>– unclear whether the local authority considers the proposal would cause harm to any heritage asset, if so why and to what degree.</li> </ul> <p><u>Land near Ellsbridge House, Keynsham</u></p>

	<ul style="list-style-type: none"> <li>document acknowledges that the proposal within the curtilage of this Grade II Listed Building “<i>would have an impact on the setting of that building</i>” but no evidence that sets out the extent of this impact; the significance of the heritage asset likely to be affected (reference to NPPF, para 132: “<i>great weight</i>” should be given to the conservation of any heritage asset, including its setting)</li> </ul> <p><u>Planning across boundaries</u></p> <ul style="list-style-type: none"> <li>If the Council is struggling to find suitable sites there may be alternative opportunities in adjoining local authority areas (NPPF, para 178: local planning authorities are required to work collaboratively with other bodies to ensure that strategic priorities such as adequate provision for Gypsies, Travellers and Showpeople across local boundaries are properly co-ordinated and clearly reflected in local plans</li> </ul>
Environment Agency	<p><u>Old Colliery Buildings, Stanton Wick</u></p> <ul style="list-style-type: none"> <li>Salter’s Brook, which runs along the Eastern boundary of the site should be identified as a potential site constraint and pitches set back from the watercourse which should be protected and enhanced where possible.</li> </ul> <p><u>Station Road, Newbridge</u></p> <ul style="list-style-type: none"> <li>previous uses at this site may have resulted in contamination and development could pose a risk to controlled waters and human health which needs to be properly investigated and where necessarily remediated.</li> </ul> <p><u>Lower Bristol Road, Twerton</u></p> <ul style="list-style-type: none"> <li>site is adjacent to the Newton Brook and falls partly within Flood Zone 3 (high risk) and to comply with the NPPF and Policy CP11 of the Draft Core Strategy it should be made clear that to be acceptable all pitches will need to be sequentially located outside of the flood risk area and the Brook should be protected and enhanced where possible.</li> </ul>
Network Rail	<p><u>Lower Bristol Road, Twerton</u></p> <ul style="list-style-type: none"> <li>would not want to see any type of development in this site which would have the potential to increase existing levels of level of trespass and vandalism on the railway</li> <li>due to proximity of the site to the Great Western Main Line and speed of trains and associated noise and vibration issues does not consider this to be an appropriate or safe environment for this type of development</li> <li>if the LPA is minded to progress this site for the use of travellers then certain measures would need to be met as part of any planning permission</li> </ul>
Wessex Water	<ul style="list-style-type: none"> <li>possible that all sites can be connected to water supply and foul sewer</li> </ul>
<u>Parish and Town Councils</u>	
Chelwood Parish Council	<p><u>Old Colliery Buildings, Stanton Wick</u></p> <ul style="list-style-type: none"> <li>proposal contrary to Policies HG.16 and CP11</li> <li>extant residential permission relates to a smaller area on the site</li> <li>very special circumstances do not exist to justify this proposal</li> </ul>
Corston Parish	<ul style="list-style-type: none"> <li>no objections to any of the proposed sites</li> </ul>

Council	
Dunkerton Parish Council	<ul style="list-style-type: none"> <li>- all potential brownfield sites must be fully assessed before any Green Belt areas are brought forward as they tend to be in areas that already have the appropriate local services</li> </ul>
Keynsham Town Council	<p><u>Land near Ellsbridge House, Keynsham</u></p> <ul style="list-style-type: none"> <li>- concerns for the ecology on this site and urgently request that Environmental and Ecology Assessment Surveys be carried out and woodland has been classed as being very important</li> <li>- significant impact on the Grade II Listed Building of Ellsbridge House and its setting</li> <li>- could have an impact on the existing Green Belt</li> <li>- full Highways and Traffic Safety Assessment should be undertaken for proposed accesses</li> <li>- site has not been defined correctly</li> <li>- relocation of the bus stop should not be undertaken without prior permission of the Traffic Commission and consultation with Keynsham Town Council who are responsible for its up keep</li> <li>- needs assessment should be updated to obtain correct provision/requirement figures</li> <li>- evidence that the Gypsy and Traveller Community have been asked whether this particular site would be suitable and meet their needs</li> </ul>
Monkton Farleigh Parish Council	<ul style="list-style-type: none"> <li>- No comments at this stage</li> </ul>
Publow with Pensford Parish Council	<p><u>Old Colliery Buildings, Stanton Wick</u></p> <p>Proposal contrary to policies in the Local Plan and national policy guidance:</p> <ul style="list-style-type: none"> <li>- travellers' sites are inappropriate development in the Green Belt</li> <li>- will detract from the openness and rural character of the area</li> <li>- far from services, facilities, employment and other activities and public transport and create an increase in vehicle movements to and from the site: travel plan will be required</li> <li>- would not support the existing local businesses within the vicinity</li> <li>- will dominate the nearest settled community, Stanton Wick and double the population, also impact on the neighbouring villages</li> <li>- will not be an integrated co-existence between the site and the community</li> <li>- access road is a single country lane and unsuitable for this amount of additional traffic</li> <li>- access from the main road is extremely dangerous as vision is impaired in both directions</li> <li>- would place undue pressure on the local infrastructure where there is no mains services</li> </ul>
Radstock Town Council	<p><u>Former Radstock Infant School Canteen</u></p> <ul style="list-style-type: none"> <li>- concerns about impact on the street scene and the Conservation Area</li> <li>- site could be used for other uses including affordable housing</li> <li>- site is too small to support extended families central to the culture of the travelling community</li> </ul>

	<ul style="list-style-type: none"> <li>- suggest there are other potential sites in Radstock but not in Council ownership</li> </ul>
Stanton Drew Parish Council	<p><u>Old Colliery Buildings, Stanton Wick</u></p> <ul style="list-style-type: none"> <li>- Concerned they were only made aware of the site as a preferred option very late in the process</li> <li>- disagrees strongly with any potential pitch provision at this site</li> <li>- scoring matrix flawed and therefore the site should not have been placed on the preferred list</li> <li>- whole process needs to be commenced again so that Gypsy and Traveller communities are provided with safe, healthy, small sites located close to urban areas (being their preference in the GTAA) - unauthorised sites are usually found in or around major road networks and close to urban areas for ease of movement and accessing of services</li> <li>- site is not available in terms of the proposal for a gypsy, travellers site for numerous reasons of suitability and achievability citing past planning refusals on the proposal site and neighbouring Filers coach site</li> <li>- concerned about the ground contamination on site and refers to the Sanctus report (2010) found ground contamination with high levels of arsenic and asbestos on site - full contamination survey across all areas needs to be done</li> <li>- site is a Site of Nature Conservation Interest with European protected species which should have been scored in the matrix</li> <li>- bats are known to fly and feed in the area and the hibernarium is located within the boundary of the Winding House - full year round bat assessment would need to be carried out to ascertain the exact movements of the bats</li> <li>- Green Belt location and no very special circumstances exist</li> <li>- considers the proposal would overwhelm the settled community and contrary to Government policy</li> <li>- Environmental Impact Assessment and Equality Impact Assessment should be undertaken</li> <li>- mains water supply is potentially inadequate</li> <li>- full highways report needs to be done and looking at the evidence from planning applications in the area</li> <li>- a mine safety assessment needs to be carried out</li> <li>- creating a large 'ghetto' such as proposed would adversely affect social integration and the remoteness of the site could potentially be very isolating for young gypsy/traveller mums with young children</li> <li>- impact on local schools a concern and driving to school along the lane would create huge amount of vehicle movements and secondary school location not even mentioned in the scoring matrix</li> <li>- agree that the site is not in a sustainable location in terms of increased traffic generation and that a full highways assessment needs to be conducted</li> <li>- concerned that the proposals will not be able to enhance the environment</li> <li>- action plan needed for harm to the SNCI, the wildlife, the landscape but most importantly the new residents</li> </ul>

	<ul style="list-style-type: none"> <li>- agree 'it may be appropriate to restrict or avoid development at the perimeter of the site to avoid impact on neighbouring properties'</li> <li>- proposals in this location also contravenes Planning Policy for Travellers Sites, March 2012, Core Strategy Policy CP11, Local Plan policies, in particular, Policy HG.16</li> <li>- also comments extensively on the Sustainability Appraisal of the Stanton Wick Site</li> </ul>
<p>Stowey Sutton Parish Council</p>	<ul style="list-style-type: none"> <li>- Majority of unauthorised encampments over the last 10 years have been in Bath demonstrating that the demand for pitches is within an urban setting and not a rural one and therefore that the selection of proposed sites is almost totally inappropriate as with one exception</li> </ul> <p><u>Old Colliery Buildings, Stanton Wick</u></p> <ul style="list-style-type: none"> <li>- fails to understand how the site at Stanton Wick was scored 17<sup>th</sup> out of 23 possible sites and yet selected</li> <li>- appears that this site is totally inappropriate due to its Green Belt location, inaccessibility to services, amenities and public transport, and unstable mine workings.</li> </ul>
<p><u>Other key bodies</u></p>	
<p>Avon Wildlife Trust</p>	<ul style="list-style-type: none"> <li>- Government policy states that Green Belt land should be protected from inappropriate development which has not been given as much weight as three of the six sites are in or partially inside the Green Belt (GT.1, GT.2 and GT.8)</li> <li>- concerned that planning policy for "the protection of local amenity and local environment" has not been given due regard as all sites, except GT.6, are adjacent or on important wildlife sites and should be informed by an ecological assessment of likely impacts to these sites and therefore objects in principle to development on these designated sites.</li> </ul> <p><u>Old Colliery Buildings Stanton Wick</u></p> <ul style="list-style-type: none"> <li>- supports use of brownfield sites but site's allocation should be informed by an ecological survey</li> <li>- appears to overlap with around 90% of the Pensford Complex SNCI, a Post Industrial Site and Priority Habitat and the potential impacts of which could effect the site's ability to play a role in BANES wildlife network contrary to the NPPF which says that the country's wildlife network should be created, protected, enhanced and managed</li> <li>- BRERC data shows that a number of bat species have been cited in the area therefore a traveller site here would represent the inappropriate development as increased lighting will impact their foraging.</li> </ul> <p><u>Station Road, Newbridge</u></p> <ul style="list-style-type: none"> <li>- appears to be adjacent to the Bristol to Bath cycle network, with BRERC records showing the presence of slow worms, bats, badgers and birds</li> <li>- increase in disturbance to these species needs to be considered, with an ecological assessment to inform development.</li> </ul> <p><u>Lower Bristol Road, Twerton</u></p> <ul style="list-style-type: none"> <li>- site is within the Green Belt and Bath World Heritage Site,</li> </ul>

	<p>objects in principle to this development; site is within, the boundary of, and not adjacent to, Carrs Wood, SNCI and Local Nature Reserve, as well as Newton Brook SNCI</p> <ul style="list-style-type: none"> <li>- impact of the current unauthorised travellers on the areas ecology should be examined before the site is taken forward.</li> </ul> <p><u>Land near Ellsbridge Home, Keynsham</u></p> <ul style="list-style-type: none"> <li>- area is identified as being covered with mature trees and therefore may participate in the area's wildlife network; an ecological survey, focusing on bats and birds should be implemented to assess the ecological impacts a travellers site may have and allow for appropriate buffering, and mitigation to occur.</li> </ul>
<p>The Gypsy Council</p>	<ul style="list-style-type: none"> <li>- would like to see more site provision, whether this be in the form of public or private sites and plan to meet continued future needs</li> <li>- would recommend smaller site as these are easier to manage and provide opportunities for education, training, employment, health care</li> <li>- recommends working in partnership with all public and private service providers and local Gypsy and Traveller community in the provision and management of more public and private affordable accommodation.</li> </ul>