

**Re: Bath and North East Somerset Council  
Gypsies, Travellers and Travelling Showpeople  
Site Allocations Development Plan Document**

**12/6/2012**

We strongly support the call for a pause in the consultation process pending a new needs assessment. The Government's Planning Policy for Traveller Sites of March 2012 requires a proper needs assessment including consultation and engagement with both settled and traveller communities. It states clearly that Green Belt sites are not suitable for Gypsy and Traveller sites except in exceptional circumstances; it also states that the scale of rural sites should not dominate the nearest settled community. The current 'Preferred Options' document puts forward several sites which are not in conformity with these policies and which scored badly in the Detailed Sites Assessment. By promoting these sites without its own robust and up-to-date evidence base, Bath and North East Somerset Council risks unnecessary disruption to settled communities and damage to the Green Belt; it risks a failure to meet the real needs of Gypsies and Travellers; and it risks expensive and politically damaging legal challenges.

The March 2012 policy requires that planning for Gypsy and Traveller sites should aim to reduce the number of unauthorised encampments. A new needs assessment should therefore examine the current Gypsy and Traveller population, with the aim of authorizing existing sites or creating new sites to meet their actual needs. The Gypsy and Traveller population comprises several distinct groups, with very different needs and cultures. The new needs assessment should therefore include an analysis of the ethnic or cultural backgrounds of the existing population, and should aim to determine which groups are likely to use any new authorized transit pitches.

The current evidence base, the 2007 West of England Gypsy and Travellers Accommodation Assessment, makes it clear that the local Gypsy and Traveller population was at that stage made up of one or two households of Irish Travellers; possibly one household of Romany Gypsies; two households of travelling showpeople; and between 14 and 17 households of New Travellers.

If that remains the case, the current need for permanent accommodation is therefore almost all for New Travellers. The current population of New Travellers is largely based on the Lower Bristol Road site and at a nearby site on Stoney Lane, which is not mentioned in the current consultation documents. These two sites probably comprise the great majority of the local Gypsy and Traveller population and any new authorized permanent pitches would be largely for their use. The first stage of a new needs assessment should therefore be to engage and consult with them. We are aware that Cllr Tim Ball has been meeting

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with these groups and we suggest that his work should inform a more structured and transparent process of consultation.

The Stoney Lane site, which currently has around 7 households, has been in place for 10-11 years and enjoys generally good relations with neighbours. We feel that if this site were to become an authorized site, it would remove the need to establish a new site elsewhere.

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