



Gypsy and Traveller Site Allocations Development Plan Document

Issues and General Approach
Consultation Document

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1	Foreword	2
2	Introduction	4
	2.1 Purpose of the study	4
	2.2 Background	4
	2.3 Wiltshire Gypsy and Traveller strategy	6
	2.4 Previous site search studies	6
3	Policy content	7
	3.1 Gypsies and Travellers	7
	3.2 Travelling Showpeople	8
	3.3 Regional Spatial Strategy	8
	3.4 Development plan document	9
4	Existing Gypsy and Traveller provision in Wiltshire	10
5	Identified need in Wiltshire	12
	5.1 Gypsy and Traveller accommodation needs assessment (GTAA)	12
	5.2 RSS review of additional Gypsy and Traveller pitch requirements	13
	5.3 Gypsy and Traveller provision delivered to date	15
	5.4 Anticipated number of sites required	15
	5.5 Transit need	16
	5.6 Travelling Showpeople	16
6	Site specific	18
	6.1 Site location	18
	6.2 Site size	19
	6.3 Site expansion	20
	6.4 Site requirements	21
	6.5 Site management	24
7	Proposed site selection methodology	26
	7.1 Background	26
	7.2 Identifying search areas	27
	7.3 Tier 1: Location	28
	7.4 Tier 2: Access and infrastructure	31
	7.5 Tier 3: Design and accessibility	33
8	What happens next?	37
	8.1 Stage 1: General approach	37
	8.2 Stage 2: Issues	37
	8.3 Stage 3: Options	37
	8.4 Stage 4: Preferred option	37
■	Appendices	
A	- Call for sites	39
B	- Proposed scoring matrix	41
C	- Suggested site identification/ assessment template	50
D	- Glossary	52

1 Foreword

- 1.1 Wiltshire Council is committed to taking a strategic approach to assist in meeting current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople across Wiltshire.
- 1.2 Wiltshire Council has worked closely with CDN Planning to produce this **Issues & General Approach Report** which forms the basis of this public consultation. This represents the first stage in the preparation of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).
- 1.3 The purpose of this document is to invite views on the issues that the Council believes are central to identifying suitable and sustainable locations for future Gypsy, Traveller and Travelling Showpeople sites. Consensus is sought on the issues at the earliest stage in the preparation of the DPD which will enable the council to develop policies which are based on a robust evidence base.
- 1.4 This document will be subject to public consultation which will run from **Tuesday 6 April until Friday 4 June 2010**.
- 1.5 The purpose of the consultation is:
- To discuss the **ISSUES** around providing new sites for Gypsy, Traveller and Travelling Showpeople sites in Wiltshire. Section 6 of this document discuss the site specific issues identified to date;
 - To develop a **METHODOLOGY** for assessing what is a good location for new sites for Gypsy, Traveller and Travelling Showpeople in Wiltshire. Section 7 outlines a proposed site selection methodology;
 - To invite **LAND** to be put forward to be considered as possible new sites for Gypsies, Travellers and Travelling Showpeople in Wiltshire. (Appendix A)
- 1.6 This *Issues & General Approach Report* document does not make any statement of intent and readers should note that the Council has made no decision in favour of any possible sites at this stage. Once the criteria for site selection have been agreed following the results of this first consultation, a second public consultation will take place on the site options identified specifically to look at site options for Gypsy and Travellers' sites that meet those identified criteria.
- 1.7 Views are being invited on all aspects of the 'Issues and General Approach Report' but in particular:
- **GTQ1:** Have the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities been correctly identified?
 - **GTQ2:** Do you agree with the issues identified in Section 6 and are there any other issues which have not been identified?
 - **GTQ3:** Do you agree with this proposed site selection methodology?
 - **GTQ4:** Are you aware of any sites/land that might be suitable for Gypsy and Traveller pitches and/or plots for Travelling Showpeople?
 - **GTQ5:** Any other comments.

1.8 If you would like to discuss the issues involved in this consultation in more detail, drop in events are being held between 4pm and 8pm at:

- Neeld Hall, Chippenham, Wednesday 5th May 2010
- Wessex Room, Corn Exchange, Devizes, Tuesday 11th May 2010
- Meeting Room, City Hall, Salisbury, Thursday 13th May 2010.

Our preferred method of communication is for comments to be submitted on-line at <http://consult.wiltshire.gov.uk/portal>.

Alternatively, comments can be sent by e-mail to spatialplanningpolicy@wiltshire.gov.uk, or in writing to:

Spatial Planning (Gypsy and Traveller DPD)
Economy & Enterprise
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

2 Introduction

2.1 Purpose of the study

- 2.1.1** Wiltshire Council commissioned CDN Planning (Wales) Ltd in September 2009 to undertake a study to identify and assess suitable sites to meet the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities within Wiltshire. Broadly, the objectives of the study are:
- To produce a robust and defensible evidence base for the provision of Gypsy and Traveller and Travelling Showpeople sites in Wiltshire;
 - To define a clear spatial strategy and methodology for meeting unmet demand for Gypsy and Traveller and Travelling Showpeople sites in Wiltshire;
 - To produce a criteria-based policy for the location of Gypsy and Traveller and Travelling Showpeople sites in Wiltshire that can be used to guide the allocation of sites;
 - To identify and assess suitable sites to meet the Regional Spatial Strategy (RSS) requirement for additional Gypsy and Traveller and Travelling Showpeople sites in Wiltshire.
- 2.1.2** The need for additional Gypsy and Traveller accommodation was first identified through a Gypsy and Traveller Accommodation Assessment (GTAA) undertaken for Wiltshire and Swindon in 2006. Further need was identified as part of the emerging RSS where elements of the GTAA were challenged during the Examination in Public. The emerging RSS also highlights the need for additional Travelling Showpeople plots in Wiltshire.
- 2.1.3** The objective of this report is to provide an evidence base and outline a robust methodology for the preparation of a Gypsy and Traveller Site Allocations Development Plan Document (DPD), which will form part of the Wiltshire Local Development Framework (LDF). This report will also outline a proposed general approach for the identification of suitable candidate sites for Gypsy and Traveller and Travelling Showpeople accommodation in Wiltshire.

2.2 Background

- 2.2.1** Wiltshire, often referred to as the 'gateway to the West Country', is home to approximately 460,000 people. Wiltshire Council replaced the former district councils of North Wiltshire, West Wiltshire, Kennet and Salisbury as well as the former Wiltshire County Council. The Wiltshire Council area is bounded by Swindon, Hampshire, Dorset, Somerset, Gloucestershire, Oxfordshire and Berkshire. The area includes several key towns including Trowbridge, Salisbury, Chippenham, and Devizes.
- 2.2.2** The county is primarily rural in character with much of it designated as an Area of Outstanding Natural Beauty and the Stonehenge and Avebury World Heritage Site is located within its borders.
- 2.2.3** A well established Gypsy and Traveller community exists in Wiltshire. The majority of Gypsies and Travellers in Wiltshire identify themselves as English Travellers or Romany Gypsies with some Irish Travellers. These communities reside on a mix of local authority sites, privately owned sites and unauthorised sites. New Age Travellers can also be found in Wiltshire, although their settlement pattern is more transient with numbers increasing during the summer months.

- 2.2.4** In accordance with guidance from the Department of Communities and Local Government (DCLG) Wiltshire Council undertakes a bi-annual count of caravans across Wiltshire. Whilst caravans do not necessarily relate to the number of pitches, the count data is used to monitor the pressures on existing sites, both authorised and unauthorised.
- 2.2.5** In November 2009 the data taken from the July 2009 caravan count was published and the figures for Wiltshire are summarised in Table 1 below, including previous count information. A total of 340 caravans were counted in Wiltshire. Of those counted approximately 69% were on authorised sites (public or private), approximately 21% were on unauthorised developments (i.e. on land that was owned by Gypsies and Travellers), and about 10% were on unauthorised encampments (i.e. on sites where the land was not owned by the Gypsies and Travellers).
- 2.2.6** A further Caravan Count has recently been completed and will be used to update the information on the number of caravans across Wiltshire.

TABLE 1: Caravan Count Data

Wiltshire Count	Authorised Sites (with planning permission)		Unauthorised Sites (without planning permission)				Wiltshire Total
	No. of Caravans		No of Caravans on Sites on Gypsy-owned land		No. of Caravans on Sites on land not owned by Gypsies		
	Socially Rented	Private	Tolerated	Not Tolerated	Tolerated	Not Tolerated	
Jul 2009	135	100	46	24	0	35	340
Jan 2009	132	102	19	0	23	33	309
Jul 2008	127	71	41	0	0	19	258
Jan 2008	131	73	28	7	0	15	254
Jul 2007	108	64	27	0	0	20	219

- 2.2.7** Table 1 shows a general trend in the increase in the number of caravans in Wiltshire since 2007. This increase of just over 55% is evidence of the growing demand for sites across Wiltshire, the impacts of such increases will need to be addressed through an identification of suitable and sustainable sites.
- 2.2.8** The Highways Enforcement and Traveller Services Manager and his team of staff are responsible for the management of all local authority sites in Wiltshire, including managing waiting lists and unauthorised encampments.
- 2.2.9** Wiltshire Council currently owns and/or manages 6 residential Gypsy and Traveller sites around the County, providing a total of 96 pitches for their semi-permanent residents. A further 12 pitches are available at an established transit site in the south-east of the County.

2.3 Wiltshire Gypsy and Traveller strategy

- 2.3.1** Wiltshire Council is currently undertaking a review of its service provision for the Gypsy and Traveller communities. This will include a new Gypsy and Traveller Strategy which will create a strategy and supporting processes to deliver a coordinated and effective approach to service provision for and interaction with Gypsy and Traveller communities.
- 2.3.2** Initial consultation with Officers and the local Gypsy and Traveller communities has indicated a need for greater coordination of front-line services and engagement. Additional support is required to guide Gypsies and Travellers through the planning process, making it more transparent. This can include providing advice on how to gain planning permission for proposed development and better explaining the reasons why proposals have been refused planning permission.

2.4 Previous site search studies

- 2.4.1** In 2008, the former North Wiltshire District Council produced a study to identify suitable permanent residential sites for the Gypsy and Traveller community. *The Gypsy and Traveller Site Search: An Issues and Options Consultation* document identified a number of site options in public ownership. Site search criteria were used to assess each site, including site characteristics, assess to basic services, transport access, proximity to protected areas and on-site services.
- 2.4.2** A significant level of local opposition characterised the consultation period and ultimately no site was taken forward.
- 2.4.3** Similar studies were not undertaken by the other former authorities that now comprise Wiltshire Council.

3 Policy content

3.1 Gypsies and Travellers

- 3.1.1** *'Circular 01/2006 (ODPM) - Planning for Gypsy and Traveller Caravan Sites'* contains the Government's most recent advice on identifying new sites for Gypsy and Traveller accommodation. The Circular provides updated guidance on the planning aspects of finding sustainable sites for Gypsies and Travellers and how local authorities and Gypsies and Travellers can work together to achieve this aim. ODPM Circular 01/2006 supersedes advice contained in Circular 2/94 *Gypsy Sites and Planning*.
- 3.1.2** For the purposes of this study, the definition of Gypsies and Travellers outlined in ODPM Circular 01/2006 is used, which identifies Gypsy and Travellers as:
- "... persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such."*
- For the purpose of this study, only accommodation needs of Gypsies and Travellers will be addressed and not those of New Age Travellers.
- 3.1.3** It is often generalised that Gypsies and Travellers are a uniform, cohesive community, however the reality is they are a diverse group of communities which share some features but have their own histories and traditions. There is often fragmentation between different families and between cultural groups. The main cultural groups include Romany Gypsies, Irish Travellers, and New Age Travellers. Only Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Acts.
- 3.1.4** Many Gypsies and Travellers pursue an active itinerant lifestyle and are generally self-employed, sometimes occupied in scrap-metal dealing, laying tarmac, seasonal agricultural work, casual labouring, and other employment. However, these traditional patterns are changing whereby the community has become increasingly settled, thereby increasing the demand for new permanent Gypsy and Traveller sites.
- 3.1.5** One of the key intentions of ODPM Circular 01/2006 is to create and support sustainable, respectful, and inclusive communities where Gypsies and Travellers have fair access to suitable accommodation, education, health, and welfare provision. The Circular states, *"local planning authorities should first consider locations in or near existing settlements with access to local services."* ODPM Circular 01/2006 also requires that all candidate sites must have their social, environmental and economic impacts assessed in accordance with the requirements of sustainability appraisals, as outlined in *Planning Policy Statement 12: Local Development Frameworks (PPS12)*.

3.2 Travelling Showpeople

3.2.1 New Government advice relating to Travelling Showpeople is contained within 'Circular 04/2007: Planning for Travelling Showpeople', which supersedes the guidance contained within Circular 22/91.

3.2.2 For the purposes of this study, the definition of Travelling Showpeople outlined in Circular 04/2007 is used, which identifies Travelling Showpeople as:

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined in ODPM Circular 1/2006.

3.2.3 It is important to highlight that Travelling Showpeople do not share the same culture or traditions as Gypsies and Travellers and often classify themselves as a separate ethnic group. There is an inherit tradition of living and working from the same location, thereby omitting many travel to work journeys.

3.2.4 The needs of the Travelling Showpeople are similar to that of Gypsies and Travellers whereby sites should be located in sustainable locations with good access to GP and other health services and schools within a reasonable walking distance. The provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised development is also a key consideration.

3.2.5 The specific on-site requirement of Travelling Showpeople are somewhat different than those of Gypsies and Travellers whereby sites are often mixed-use with residential pitches and business uses on sites. On-site facilities are often required for the storage and repair of equipment, which can have implications on the impact such sites have on the surrounding locality in terms of amenity and visual impact.

3.3 Regional Spatial Strategy

3.3.1 The emerging RSS sets out the regional plan for the South West up to the year 2026. A draft version of the RSS was subject to public consultation during Summer 2006 and consultation responses were submitted to the independent Examination in Public (EiP). Based on the recommendations in the EiP, Proposed Changes to the South West RSS were issued in July 2008 and again open to public consultation until October 2008.

3.3.2 The emerging RSS sets out the number of new pitches for Gypsies and Travellers that are needed in each district in the South West between 2006 and 2026. The immediate need up to 2011 is identified. Further details on the emerging RSS have been summarised in Section 4 of this Report.

3.3.3 The recommended changes to the emerging RSS include the following policy relating to Gypsies and Travellers

GT1: Gypsy and Traveller Pitch Requirements

Local authorities will identify realistically deliverable sites in their DPDs to provide for 1672 additional pitches for Gypsies and Travellers in the region, over the period 2006-2011, distinguishing between residential and transit pitches to deliver the distribution of pitches contained in Table 4.3. Where it is appropriate to make provision beyond 2011 and other data is not available, provision should allow

for a 3% compound growth in requirements per annum. Local Authorities should take account of the specific needs of different groups of Gypsies and Travellers in making site allocations. The provision of temporary accommodation in connection with festivals and other similar annual events is an important requirement, but should not be regarded as formal transit provision to meet the requirements identified in Table 4.3.

- 3.3.4** Please note the table referred to in the above extract has been reproduced as relevant to Wiltshire in Table 4 of this report.
- 3.3.5** The recommended changes to the emerging RSS also suggest a new policy relating to Travelling Showpeople. This requires Local Authorities to identify realistically deliverable sites in their Development Plan Documents in order to provide for additional plots for Travelling Showpeople over the period 2006-2011. Local Authorities must also account for the specific needs the Travelling Showpeople community when making site allocations.

3.4 Development plan document

- 3.4.1** ODPM Circular 01/06 requires Local Planning Authorities to establish criteria for the location of Gypsy and Traveller sites in their core strategies as a guide to the specific allocation of sites in the relevant Development Plan Document (DPD). As part of the LDF process, the Circular suggests that a DPD be prepared to identify specific site allocations to meet the number of pitches identified in the RSS.
- 3.4.2** The purpose of a DPD is two-fold whereby it seeks to identify suitable sites to meet short-term or current demand for sites and also identify criteria-based policies to guide the identification of potentially suitable sites for Gypsy and Traveller and Travelling Showpeople development and assist Officers with the determination of future proposals. The Circular stipulates that criteria-based policies must be *“fair, reasonable, realistic and effective in delivering sites.”*
- 3.4.3** The identification and allocation of specific sites within a DPD, rather than a purely criteria-based policy approach, is desirable as it provides a degree of certainty for local people and Gypsies and Travellers. Although presenting a number of challenges when identifying sites (for example, land acquisition issues and local opposition), the approach as described provides some certainty to local people and Gypsies and Travellers when planning applications are determined. This is an approach increasingly adopted by a number of Local Authorities across England, including Central Bedfordshire Council, Mid Bedfordshire District Council, North Somerset Council, South Cambridgeshire District Council, South Norfolk Council, and Dorset District Council.
- 3.4.4** In summary, the main aims of a Gypsy and Traveller Site Allocation DPD are:
- To ensure that the identified needs of Gypsies and Travellers that permanently reside in Wiltshire are met through the allocation of suitable and sustainable sites;
 - To assist the Council in reducing the occurrence of unauthorised Gypsy and Traveller encampments and associated nuisance through the provision of adequate authorised accommodation;
 - To identify a range of site options across Wiltshire where Gypsy and Traveller Sites would be appropriate;
 - To facilitate the integration of the Gypsy and Traveller community with the settled community, addressing racial discrimination and tension that may exists between the settled and travelling communities.

4 Existing Gypsy and Traveller provision in Wiltshire

- 4.1 A total of 340 caravans were counted on a range of sites across Wiltshire as part of the July 2009 Caravan Count, summarised in Table 2. Sites and encampments are included in the count if the occupants are traditional and ethnic Gypsies and Travellers or members of non-traditional New Traveller groups who live in caravans or other moveable dwellings, whether or not they meet the strict legal definition of a Gypsy or Traveller.

TABLE 2: Existing Caravan Provision (As of July 2009)

Type of Site	North		South		West		East	
	Sites	Caravans	Sites	Caravans	Sites	Caravans	Sites	Caravans
Publicly managed	1	36	4	82	2	17	-	-
Temporary permission	10	82	3	11	3	7	-	-
Tolerated	1	2	6	16	-	-	1	6
Not Tolerated (Enforcement)	3	22	1	1	1	1	-	-
Unauthorised Encampments	1	10	7	19	2	9	1	5
Total	16	152	21	134	10	43	2	11

- 4.2 For the purposes of clarification the following definitions apply to the Type of Sites referred to in Table 2.

- **Tolerated Sites:** Sites on land owned by Gypsies and Travellers that do not have planning permission, but which are not subject to enforcement proceedings (the Council has taken a decision not to seek removal of the encampment/development);
- **Not Tolerated Sites:** Sites on land owned by Gypsies and Travellers that do not have planning permission and are subject to enforcement action; and
- **Unauthorised Encampments:** Sites on land not owned by Gypsies and Travellers.

- 4.3 Across Wiltshire there are a total of 7 local authority managed Gypsy and Traveller sites with a total of 135 caravans identified in the previous count. No breakdown of pitches (households) is known at this stage following initial discussions with officers. Similarly, the exact number of pitches on the county's 16 sites with temporary permissions or the 8 sites tolerated by the council is not known, although the previous count did identify a total of 100 and 18 caravans on each site respectively.

- 4.4 Wiltshire has a total of 5 unauthorised Gypsy and Traveller encampments or developments that are not tolerated, representing a total of 24 unauthorised caravans. A total of 43 caravans were found on 11 unauthorised encampments across Wiltshire during the course of the July 2009 count.

- 4.5** It should be noted that the lease for the Bonnie Park site in West Wiltshire is due to expire in February 2011. Initial consultation with local officers has indicated it is unlikely the licence will be renewed. The site is characterised by pitches small in size and a high turnover. The occupancy rate at this site is currently 71.25%. There will therefore be a need to find a replacement site to accommodate the 8 pitches lost at this site if the licence is not renewed for the site. This need is reflected in Table 3.

4.6 Redevelopment, Expansion and Intensification of Existing Gypsy and Traveller Sites

- 4.6.1** The option of expanding existing sites to provide an element of the identified need as outlined in the emerging RSS has been discussed with Officers and the Gypsy and Traveller community during initial consultation. It is desirable to allow for moderate growth of existing sites to accommodate family expansion provided there are no adverse impacts resulting - such as impact on neighbouring properties, impact on the surrounding landscape or character of the locality, or undue pressures on local physical or social infrastructure. The viability of this option will be assessed further during the next stages of the study.
- 4.6.2** From initial consultation with Senior Traveller Liaison Officers and local Gypsies and Travellers, it has become clear to the study team that the condition of many of the Council's public sites is deteriorating. Complaints range from cramped pitches, poor maintenance, lack of on-site facilities, overcrowding, and anti-social behaviour. This could be a result of poor management or a case of sites reaching the end of their life cycle. Many of the Council's sites are in need of refurbishment or complete redevelopment. The next stage of the DPD Preparation *Developing the Issues* will examine further the potential for the redevelopment of some or all of the Council's sites.
- 4.6.3** The redevelopment of existing sites, not just those managed by the Local Authority but also those in private ownership, could result in intensification with additional pitches provided within the site or a reduction in pitches to reflect DCLG's government guidance on caravan site design. The appropriate intensification of existing sites could be another option whereby the emerging RSS need is accommodated. This will need further assessment during the next stages of the study.

5 Identified need in Wiltshire

5.1 Gypsy and Traveller accommodation needs assessment (GTAA)

- 5.1.1** Local Authorities are required to assess Gypsy and Traveller accommodation needs as part of the Gypsy and Traveller Accommodation Assessment (GTAA) process.
- 5.1.2** In February 2006, David Couttie Associates (DCA) was commissioned by Wiltshire County Council, North Wiltshire, West Wiltshire, Salisbury, and Kennet District Councils as well as Swindon Borough Council, to carry out a sub-regional study of the accommodation needs and aspirations of the Gypsy and Traveller community.
- 5.1.3** The GTAA focused on not only Gypsies and Travellers living on authorised sites within Wiltshire and Swindon, but also those living on unauthorised sites and bricks and mortar.
- 5.1.4** The main recommendations made by the GTAA are summarised below:
- New Permanent Pitch Provision:
 - The study concluded a need for an additional 40 new authorised pitches to be made available between 2006 and 2011 to deal with the backlog of demand existing within the study area and to meet emerging demand from new family formation and temporary planning permission due to expire on Minety in North Wiltshire and Bonnie Park in West Wiltshire.
 - The majority of pitches should be provided on private sites.
 - Policy should be developed to provide information and advice to the Gypsy and Traveller community to guide them through the planning system.
 - Consideration should be given to planning approvals that allow for the expansion of Gypsy and Traveller sites to accommodate growing families.
 - New sites should be developed in consultation with the community and with reference to the DCLG's *Designing Gypsy and Traveller Sites: Good Practice Guide* (May 2009).
 - Begin a process of identifying and developing a new site for 6 households to address the potential closure of the Bonnie Park site in West Wiltshire in 2011 when its site licence expires should start in 2008.
 - Transit Pitch Provision:
 - A need for 24 households to be accommodated on transit pitches over a 12-month period.
 - The study concluded there should be no need for additional transit pitches given the existence of 12 transit pitches already in Wiltshire.
 - Planning Policy:
 - Local Development Frameworks should make provision for the identified need.
 - Core Strategies should contain policies that set out site search criteria for the location of Gypsy and Traveller sites which will be used to guide the allocation of sites in relevant Development Plan documents.
 - Overcrowding & Concealed Households
 - A feasibility study is required to look at the options available to address the needs of overcrowded and concealed households.
 - A range of options must be explored to meet this need – including amalgamated pitches, increasing the number of living units on existing pitches, and expanding existing sites or individual pitch boundaries.

- Future Accommodation Needs Assessments
 - Accommodation needs assessments should be carried out every 5 years to provide an update on the level of need and growth in provision locally. Based on this recommendation, a revised GTAA is due to be undertaken in 2011.
 - The study failed to identify the need arising from housing Gypsies and Travellers and recommended that systems be put in place for the local Housing Authority to record the number of Gypsy and Traveller households living in social housing locally.
- Site Management
 - The study concluded the existing site management model in Wiltshire appears to work well.
 - Systems should be put in place to ensure the consistent monitoring of site management data across the study area, including monitoring waiting lists, lettings and licence terminations to inform future GTAAs.
- Education and Health
 - New sites should be developed with access to local facilities in mind, including support for home schooling as an alternative to mainstream provision of education.
 - The needs of older and disabled members of the Gypsy and Traveller community should be addressed through liaison with Social Services and local doctors, including access to facilities and on-site facilities to enable independent living.
- Travelling Showpeople
 - The GTAA identified no specific needs for the Travelling Showpeople community.

5.1.5 Along with identifying a clear need for additional new permanent site pitches across the County, the GTAA made the following conclusions:

- There is a high level of turnover of pitches on authorised Local Authority sites.
- No new pitches are planned and there is a low level of new pitches approved through the planning system each year.
- There are waiting lists for sites across the study area and a backlog of need from households currently living on unauthorised developments or encampments within the study area.
- There is some evidence to suggest overcrowding within the study area; however, further work was recommended to assess the extent of overcrowding and possible solutions.
- New family formation at 3.8% over the next 5 years (2006-2011) is likely to continue adding pressure to demand.

5.2 RSS review of additional Gypsy and Traveller pitch requirements

5.2.1 The Centre for Urban & Regional Studies (University of Birmingham) and the Salford Housing & Urban Studies Unit (University of Salford) were commissioned by the South West Regional Assembly to benchmark Gypsy and Traveller Accommodation Assessments (GTAAs) produced by seven groups of authorities in the South West. Their final report was issued in January 2008 with the aim of verifying the robustness and consistency of the GTAAs as evidence towards the RSS Review of additional pitch requirements for Gypsies and Travellers in the South West.

5.2.2 In testing the robustness of the GTAA for Wiltshire and Swindon, the following observations were made:

Some serious reservations about the approach to estimating need which seems likely to consistently under-state the level of requirement for residential pitches. Factors include the derivation of the base population, treatment of need from unauthorised sites and assumed future vacancy levels.

In these circumstances, some amendments seem desirable. Options for amendment include:

- *Re-calculating residential pitch need by re-examining each element in the model and substituting assumptions more in line with other South West GTAAs.*
- *Apply an amended formula estimate.*

5.2.3 This process informed the Draft RSS in terms of an overall assessment of need whereby the Regional Planning Body (RPB) determined that there was not sufficiently robust information on which to establish district-level pitch numbers. Further, the overall conclusion was that the GTAA for Wiltshire and Swindon was deemed to be less robust than other GTAAs prepared in the South West.

5.2.4 An Independent Panel Report on the Examination in Public (EiP) of the Review of Additional Pitch Requirements for Gypsies and Travellers in the South West was issued in April 2008. The report contained recommendations about what changes the Panel thought should be made to the distribution of Gypsy and Traveller pitches in the South West. The findings of the Panel are summarised in Table 3 below.

TABLE 3: Gypsy & Traveller Additional Pitch Requirements to 2011

Permanent Need			
Area	Draft RSS Figures	EIP Panel Report	Proposed Changes
Kennet	0	5	5
North Wiltshire	24	48	48
Salisbury	9	18	18
West Wiltshire	7	14	14
Total	40	85	85
Transit Need			
Area	Draft RSS Figures	EIP Panel Report	Proposed Changes
Kennet	0	5	5
North Wiltshire	12	12	12
Salisbury	0	5	5
West Wiltshire	0	5	5
Total	12	27	37

5.2.5 In terms of the need for additional plots for the Travelling Showpeople community, the EiP Panel Report identified a requirement for 5 additional plots in Wiltshire and Swindon between 2006 and 2011. Wiltshire Council will work closely with Swindon Borough Council to address this identified need.

5.3 Gypsy and Traveller provision delivered to date

5.3.1 The precise regional breakdown of the RSS identified need, along with the total number of site options required will need to be investigated further, however at this stage it is reasonable to conclude that the number of required pitches can be reduced based on recent planning permissions for new Gypsy and Traveller pitches since 2006. The required need may also be influenced by the evidence collected as a result of this consultation exercise.

5.3.2 Table 4 provides a summary of what implications recent planning permissions will have on the Draft RSS requirement and identifies the residual need that will need to be met by Wiltshire Council.

TABLE 4: Future Gypsy and Traveller Provision						
Area	Draft RSS Requirement (2006-2011)		Provision Delivered (since 2006)		Residual Requirement (2006-2011)	
	Permanent (A)	Transit (B)	Permanent (c)	Transit (D)	Permanent (A)-(C)	Transit (B)-(D)
North	48	12	32	0	16	12
South	18	5	0	0	18	5
East	5	5	0	0	5	5
West	14	5	4	0	10	5
Total	85	27	36	0	49	27

5.3.3 The Gypsy and Traveller Site Allocation DPD will identify sufficient site options to meet the residual requirement up to 2011 identified above.

5.3.4 There are currently two further planning applications at Chelworth Lodge, Cricklade (16 pitches) and Land adjacent to Calcutt, Cricklade (14 pitches) which are pending a decision. Should these proposals gain planning permission; this will inevitably have an impact on the figures identified in Table 4 above.

5.4 Anticipated number of sites required

5.4.1 Based on the identified RSS need above, it is anticipated that there could be a requirement to identify up to 3 permanent Gypsy and Traveller sites based on a site size of 15 to 20 pitches. This is supported by a range of Government guidance, the findings of the GTAA and initial consultation with Officers and the local Gypsy and Traveller community undertaken by the study team.

- 5.4.2** Smaller family sites of between 5 and 10 pitches could be an alternative approach to larger site options, this will increase the required number of sites to be provided. It would be desirable to include a mix of options in terms of size. Further discussion with the local Gypsy and Traveller community will be required to identify the precise needs in terms of site size.
- 5.4.3** As with the settled community, it is acknowledged that Gypsies and Travellers will also require a range of tenures. Evidence suggests that many Gypsies and Travellers would prefer to purchase and manage sites themselves and maintain them in private ownership. It is therefore likely that much of the required provision will come forward through private development of sites. However, a provision of public sites will also be required for those unable to secure private plots. Affordable provision can also be accommodated through Registered Social Landlords (RSL). Both the Council and RSLs are eligible for grant funding to establish and run Gypsy and Traveller Sites.

5.5 Transit need

- 5.5.1** The emerging RSS has identified a need for 27 transit pitches between 2006 and 2011. The precise number of sites, size of sites, and the distribution of sites across the Wiltshire area has yet to be determined. Information gained as a result of this public consultation will help to identify appropriate locations for Transit provision.
- 5.5.2** Transit pitches can be accommodated either within permanent sites or on separate transit site(s). Early consultation with the local Gypsy and Traveller community and the previous experience of the study team has indicated a preference for independent transit sites. Often there is a view that providing transit pitches within a permanent residential site can result in management issues resulting from anti-social behaviour. Transit provision within permanent sites would ideally be restricted to visiting family and friends.
- 5.5.3** Early stakeholder consultation with officers and the Gypsy and Traveller community has identified a preference for small transit sites located close to key travel routes, ideally close to the M4 Motorway and A-Roads.
- 5.5.4** In order to provide a range of location options for transit provision, minimise the distance needed to travel to transit sites and thereby reducing the likelihood of unauthorised encampments, it would be advisable to provide a range of sites across the Wiltshire – perhaps 2 to 3 sites of between 10 and 15 pitches.

5.6 Travelling Showpeople

- 5.6.1** The emerging RSS has identified the need for up to 5 plots to meet the accommodation needs of the Travelling Showpeople community in the wider Wiltshire and Swindon area. It is anticipated that one site will be required to meet this need. Further clarification however is required on the precise local need as it is not immediately clear how this figure was devised. Given the RSS has identified the need for up to 5 plots covering not just Wiltshire but also Swindon, this will need to be addressed through collaboration with officers at Wiltshire Council and Swindon Borough Council.
- 5.6.2** Early consultation has been undertaken with members of the Travelling Showpeople community in Swindon and Wiltshire. In November 2009, the study team met with Stephen Hill of the Travelling Showmen's Guild who currently occupies a site in Swindon. His perception of the GTAA and RSS process was that it neglected to fully address the different needs of the Travelling Showpeople

community and indicated a need for up to 10 additional plots. Similarly, further consultation with the Travelling Showpeople community in Wiltshire identified a potential need for a further 10 new plots and storage space.

- 5.6.3** Further clarification is required to determine the exact need for additional Travelling Showpeople plots in Wiltshire.

Question GTQ1

Identified Need

Section 5 provides a review of how the accommodation needs of Gypsies, Travellers and Travelling Showpeople has been identified. This translates into a need for 49 permanent pitches and 27 transit pitches for Gypsies and Travellers within Wiltshire and a further need for 5 Travelling Showpeople plots within the wider area of Wiltshire and Swindon.

Have the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities been correctly identified?

6 Site specific

6.1 Site location

- 6.1.1** The findings of the GTAA for Wiltshire and Swindon suggests that nearly 65% of Gypsies and Travellers wish to be located in rural areas, 27% prefer to live in a village, and only 7% would prefer to live in a town. This evidence, along with the guidance contained in Circular 01/2006 suggests a need to identify a range of locations for candidate sites, including sites in built-up areas, areas on the outskirts of built-up areas, rural or semi-rural locations, and previously developed (brownfield) or derelict land. All suitable sites should be considered appropriate in principle provided there is no specific planning or other constraints limiting the development of these sites.
- 6.1.2** Potential sites for Gypsy and Traveller use should not be considered in areas deemed to be inappropriate for residential use, either private or social. Government guidance on site design stipulates that a Gypsy and Traveller site should receive the same considerations as other forms of accommodation and should not be located in areas which will have a detrimental effect on the general health and well being of the residents. Sites should have adequate access to services such as health and education and shopping facilities. This is supported by the findings of the GTAA for Wiltshire and Swindon along with initial consultation undertaken by the study team through Officer workshops and early interviews with members of the Gypsy and Traveller community.
- 6.1.3** Table 5 briefly identifies key site considerations as outlined in Government's guidance relating to the design of Gypsy and Traveller and Travelling Showpeople sites.

TABLE 5: Site Considerations	
Accessibility	A site should have good access to a public road which is safe and direct. Consideration should also be given to access issues relating to disabled and elderly members of the community.
The Site	The proposed site must be relatively flat and suitable for purpose. Sites should not be developed on exposed sloping sites where there is risk of caravans being overturned or where there is a high probability of flooding risk.
Local Services	Easy access to local services, and to social contact with other residents in the community, should help deal with the myths and stereotypes which can cause community tension. Site should be located within reasonable distance from a school, shops, medical services and other community facilities. If a site is located or going to be located in a rural area this will, in many situations, not be achievable.
Environment	The location of a site should always be in acceptable surroundings or where the surroundings can be made pleasant at a reasonable cost. Sensitive landscaping and boundary definition should be able to provide seclusion for the residents from the elements without making them feel imprisoned in the site.
On Site Services	Water, electricity, sewage, drainage and refuse disposal should be provided on all sites.

- 6.1.4** Sites within Green Belts and Green Wedges would generally be inappropriate and all alternatives should be fully explored before Green Belt or Green Wedge locations are considered. However, Circular 01/2006 and Circular 04/2007 do not exclude development in these areas should there be no other suitable site available.
- 6.1.5** Much of Wiltshire lies within an Area of Outstanding Natural Beauty (AONB). The implications of Gypsy and Traveller and Travelling Showpeople development on the surrounding landscape require careful consideration. Suitable sites identified within the AONB may be deemed appropriate if there are likely to be no detrimental impacts on the objectives of the designations whereby any impacts can be minimised through mitigation, such as additional sensitive landscaping.
- 6.1.6** When considering potential sites, the health and safety of children and others who live on the site must be taken into account. Ideally, candidate sites should not be located near refuse sites or facilities, industrial locations and other hazardous locations such as motorway flyovers. Sites adjacent to a rubbish tip, on landfill sites, close to electricity pylons or any heavy industry are unlikely to be suitable for consideration.
- 6.1.7** Similarly, implications to health and safety and residential amenity must be considered where potential sites are located adjacent to main roads, flyovers and railway lines. Regard must be given to the greater noise transference through the walls of trailers and caravans than through the walls of conventional housing. Mitigating measures can be implemented through the design of the site to address these issues, such as additional landscaping or noise barriers, to minimise the impact on the quality of life and health of a site's occupants.
- 6.1.8** Finally, early consultation with the local Gypsy and Traveller and Travelling Showpeople community undertaken in January 2010 has indicated a desire for permanent sites to be located close to, but not within settlements. There is a desire on the part of the Gypsy and Traveller community to be close to local facilities and amenities, although there is an equal wish to be within a rural context on the edge of a settlement.

6.2 Site size

- 6.2.1** ODPM Circular 01/2006 does not recommend standards for site size, it asserts:

"It is not considered appropriate to set a national maximum size for a site, but would suggest that cases should be considered in context, and in relation to the local infrastructure and population size and density."

- 6.2.2** However, Government's *Designing Gypsy and Traveller Sites – A Good Practice Guide* states:

"There is no one ideal size of site or number of pitches although experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family."

6.2.3 The Select Committee of ODPM report on Gypsy and Traveller Sites 2004 concluded:

“permanent sites should have no more than 18 pitches ... all sites should be small and not disproportionate to the size of the community in which they are placed ... a cap should be placed on the number of people who are resident on the site ... the number of long-term visitors on a site should be controlled by planning powers and enforced by the site manager.”

6.2.4 The GTAA indicated a majority of the members of the Gypsy and Traveller communities who were consulted expressed preference for smaller sites of between 15 and 20 pitches (34%) and a further 32% of respondents indicating sites should have less than 15 pitches. Preliminary consultation undertaken by the study team with the local Gypsy and Traveller community supports this evidence.

6.2.5 Having undertaken an initial assessment of the size of each settlement in the County, and based on experience working with other Authorities, it is considered that smaller, family sites work best. This size of a site tends to ‘work better’ by allowing for better maintenance, management, and control and result in fewer health and safety risks. This conclusion is reflected in Government guidance, as outlined above.

6.2.6 For the purposes of this study and based on the guidance above, it is recommended that a site should ideally consist of no more than 15 pitches unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community.

6.2.7 In assessing the suitability of candidate sites for permanent Gypsy and Traveller accommodation, an important consideration is determining an ideal or preferred site size. Based on the guidance set out in ODPM Circular 01/2006 and other good practice guidance on designing caravan sites, it is assumed that a site of at least 1 hectare will be required, allowing each pitch to be at least 500 square metres in size based on a development size of up to 10-15 pitches and allowing for road and other infrastructure. This is consistent with Government design guidance for Gypsy and Traveller caravan sites.

6.2.8 The requirements of Travelling Showpeople in terms of site size are materially different than those of the Gypsy and Traveller community. Although their work is mobile in nature, Travelling Showpeople require secure permanent bases for the storage of equipment, traditionally referred to as ‘winter quarters’. These sites are usually permanently occupied by some members of the family, including children enrolled in schools and elderly members of the community.

6.2.9 Travelling Showpeople sites are generally used for both residential and business use, requiring an area for on-site storage and repair of their equipment. Sites are therefore larger than Gypsy and Traveller sites, although no definitive guidance is set in Circular 04/2007 on what constitutes an ideal size site.

6.3 Site expansion

6.3.1 Due to family expansion and visiting relatives/friends and other site needs, it may be necessary to expand the size of sites. The national guidance, the findings of the GTAA and early consultation suggests sites should be no more than 15 to 20 pitches in size, proposals for a larger number of pitches should be considered on their merits regardless of site size. The potential for expanding sites to meet the needs of expanding families should also be given consideration.

6.3.2 It may be necessary to allow for some flexibility in the number of pitches to account for local circumstances. Sites should presume to be no bigger than between 15-20 pitches to allow for family growth, for example, or whereby larger sites are necessary where there is a clear and demonstrable reason to act against such a presumption. In all cases proposals must be assessed on their merits and engagement with all stakeholders is necessary.

6.3.3 The expansion of existing sites through redevelopment or intensification within existing boundaries should also be encouraged, provided such development will not have an adverse impact on local physical and social infrastructure and no harmful impact on the amenity of neighbouring land. Such development could help to meet the need arising from family expansion and also meet the identified need in the emerging RSS.

6.4 Site requirements

6.4.1 Sites must cater to the needs of its users. The needs of those living on a permanent residential site will be materially different from those living on a transit site and those living on temporary sites. Early consultation with the Gypsy and Traveller community has supported the experience of the study team in undertaking similar studies elsewhere in England and Wales and the findings of the GTAA.

6.4.2 Table 6 identifies the key on-site requirements and the importance of each based on national research, the findings of the GTAA, and preliminary interviews with the local Gypsy and Traveller community.

6.4.3 Although not essential requirements, the amenities outlined in Table 6 are often stated in DCLG guidance as desired provisions on permanent Gypsy and Traveller sites. They are also identified in findings of the GTAA.

6.4.4 Based on DCLG design guidance, a pitch size of at least 500 square metres would comfortably accommodate the following on-pitch facilities:

- Hard standing for 1 touring/mobile caravan and 1 static caravan
- 2 car parking spaces
- 1 amenity block
- Hard standing for storage shed and drying
- Garden/amenity area

TABLE 6: Key On-Site Requirements

Site Requirement	Permanent	Transit (up to 6 months)	Temporary (up to 28 days)
Land area sufficient for required number of pitches and vehicular/pedestrian circulation			
Utilities - water and electricity supply			
Good drainage			
Refuse collection and recycling			
Good access to local facilities			
Boundary fencing, hard standing, toilet & washing facilities, entry control			
Amenity block (1 per pitch) with day room			
Children's Play Area			
Visitor pitches/parking			
Scope for business/employment uses			
Scope for family expansion			
Access to Public Transport			
Temporary toilet block			
Access to known Gypsy and Traveller routes			

	Essential
	Desirable
	Not Necessary

6.4.5 Figure 1 below illustrates a pitch of approximately 325 square metres, reflecting the *minimum* size requirement for a double pitch taking account of all minimum separation distance requirements between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. Each pitch could accommodate a basic number of on-pitch amenities, including space for 2 vehicles and an amenity block. A single pitch or transit pitch could be halved in size as space for only a single mobile caravan would be required.

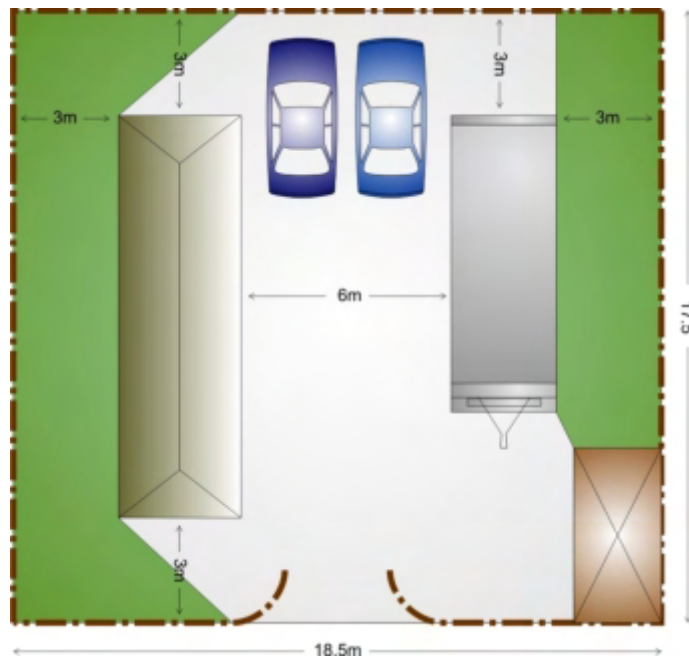


Figure 1 Minimum size requirement for a double pitch

6.4.6 Whilst the figure above illustrates the minimum design and safety requirements outlined in Government guidance, it may be desirable to provide Gypsies and Travellers with additional private amenity space.

6.4.7 During the next stage of the Gypsy and Traveller Site Allocation Study, potential sites that are less than 1 hectare in size will be assessed against the minimum requirements (as indicated in Table 6) for on-site facilities set out in Government guidance. Smaller sites will create an opportunity for providing a range of pitch sizes, maximising the best use of available land within Wiltshire.

6.4.8 Larger sites of between 1 hectare and 1.5 hectares, for example, would be able to accommodate a wider range of appropriate on-site facilities and uses, including:

- Secure children's play area
- Communal facilities (such as shared day room, laundry facilities, visitor parking spaces, lorry/work vehicle parking, etc)
- Area for dog kennels (if deemed suitable to the locality)
- Stables and/or grazing area (if deemed suitable to the locality)
- Scope for business/employment uses (if deemed suitable to the locality)

- 6.4.9** For the purposes of this Study, when assessing the raw capacity of each candidate site, it is proposed that a *maximum* pitch size of 500 square metres for permanent Gypsy and Traveller pitches and 250 square metres for transit Gypsy and Traveller pitches be applied, taking account of the necessary space requirements for internal road(s), shared/communal areas, and parking and circulation space.
- 6.4.10** Sites for Travelling Showpeople will need to be large enough to accommodate both residential plots and areas for equipment storage and maintenance and to accommodate both uses. On-site requirements for the residential area of the site will be no different than those of the Gypsy and Traveller community. Additional on-site facilities may include a large workshop area (for year-round maintenance of equipment, weatherproof) along with storage areas for large lorries and other equipment.

6.5 Site management

- 6.5.1** DCLG's *Gypsy and Traveller Site Management: Good Practice Guide* provides detailed guidance and advice in relation to the management of socially rented sites, including local authority sites and registered social landlords. The guidance provides a list of factors that make for a successful site, which is not exhaustive:
- *In good repair*
 - *Clean and tidy*
 - *Quite and peaceful*
 - *Residents like it there*
 - *Freedom to carry on lifestyle*
 - *People at ease and not frightened*
 - *Children in school*
 - *Health and other services available*
 - *Social cohesion*
 - *Well maintained for the use of residents*
 - *Not causing the local authority major expense or trouble*
- 6.5.2** Effective site management is essential to establishing a new site and successfully integrating it with the settled community. Properly managed sites can be successful, self-financing and sustainable. Sites that are better managed can also provide greater stability and an improved quality of life for what is a highly socially excluded group (for example, through improved access to education and health services).
- 6.5.3** In undertaking similar studies across England and Wales relating to the provision of Gypsy and Traveller accommodation, the study team has concluded through various consultation exercises with both the Gypsy and Traveller community and the settled community that a general preference exists for smaller, privately owned and managed sites. Preliminary interviews with the local Gypsy and Traveller community in Wiltshire suggest this assumption is correct, as does the findings of the GTAA.
- 6.5.4** There will inevitably be a demand for sites managed by Local Authorities in providing affordable plots for members of the Gypsy and Traveller community who can not afford to develop their own site or purchase a plot on a privately managed site. There is also a role for the Local Authority in managing transit sites, although provision for transit pitches can be accommodated on private sites (although this is often restricted to extended family of those permanently occupying the site).

- 6.5.5** Further consultation is required with key stakeholders and officers as well as the Gypsy and Traveller community in relation to site management. This will form part of Stage 2 of the DPD preparation.

Question GTQ2

Site Issues

Section 6 has identified issues relating to what makes a good and successful site for Gypsies, Travellers and Travelling Showpeople; the potential landscape impact of a site; the size of the site; the opportunities for expansion or intensification of existing sites; on site requirements and site management.

Do you agree with the issues identified in Section 6 and are there any other issues which have not been identified?

7 Proposed site selection methodology

7.1 Background

7.1.1 It is proposed that candidate sites will be assessed using a criteria-based three-tier approach where consideration is given to a wide range of environmental, economic and social factors in order to determine the suitability and sustainability of the site. The approach is summarised briefly in Table 7 below with each element of the methodology then discussed in further detail from Paragraph 7.3

TABLE 7: Summary of Three-Tier Site Identification/ Assessment Approach	
Tier 1: Location, Policy & Environmental Constraints	
<i>Relationship to Settlements</i>	Sites should ideally be within an agreed acceptable distance of a neighbourhood/district centre via safe walking/cycle route(s).
<i>Policy Constraints</i>	Sites should avoid any adverse impact on local/national designations (such as conservation areas and Areas of Outstanding Natural Beauty)
<i>Environmental Constraints</i>	Sites should avoid any hazardous areas (such as flood zones, contaminated land)
Tier 2: Access & Infrastructure	
<i>Physical Infrastructure</i>	The capacity of local infrastructure to accommodate the maximum number of pitches on a site.
<i>Transport Infrastructure</i>	Access to site options should be in line with adopted highway guidance and standards. Access to public transport should be within an agreed distance and frequency.
<i>Social Infrastructure</i>	Sites should be within an acceptable walking distance of at least 3 local amenities/services, including schools, shops, medical facilities, recreational facilities via safe walking/cycle route. Capacity of existing infrastructure is also considered.
<i>Other Considerations</i>	The relationship of a site with existing Gypsy and Traveller sites (if any) is considered.
Tier 3: Design & Deliverability	
<i>Design & Impact</i>	The use of a site for Gypsy and Traveller accommodation is assessed in terms of its impact on the character/appearance of the surrounding area, along with the impact on the residential amenity of nearby properties.
<i>Deliverability</i>	The ease of acquisition is considered along with indicative costing of bringing the sites forward for development (detailed site layouts and costing are prepared for top-performing sites).

7.1.2 The approach outlined below has been used in similar studies undertaken by CDN Planning and is based on Government guidance contained in Circulars 01/2006 and 04/2007, *Designing Gypsy and Traveller Sites: A Good Practice Guide*, along with the advice and findings within the GTAA for Wiltshire and Swindon.

7.1.3 In 2003-04 CDN Planning applied its three-tier approach to site selection and assessment when identifying site options for a new permanent Gypsy and Traveller site for Colchester Borough Council. The methodology used was called before a scrutiny committee and after a thorough investigation it was concluded to be a fair, robust and sound planning-based methodology.

- 7.1.4** Subsequently the approach has been expanded to meet the requirements of new and emerging Government guidance relating to Gypsy and Traveller site identification and design, including Government's *Circular 01/2006 (ODPM) - Planning for Gypsy and Traveller Caravan Sites* and DCLG *Designing Gypsy and Traveller Sites - Good Practice Guide* (May 2008).
- 7.1.5** The methodology also takes account of guidance relating to sustainable development provided in the *Code for Sustainable Homes* and its predecessor BRE EcoHomes. Access requirements are set out in adopted and emerging local policy and guidance, including *Manual for Streets* and *TAN18: Transport*
- 7.1.6** Building on CDN Planning's experience in identifying a new permanent Gypsy and Traveller site for Colchester Borough Council (2003) and the requirements of the above guidance, a revised three-tier approach was used to assist Derby City Council (2007) in undertaking a review of its short-list of site options for a new permanent Gypsy and Traveller site.
- 7.1.7** The methodology has also been employed in similar studies on behalf of Vale Royal Borough Council (2008), and current work on a site identification study on behalf of Torfaen County Borough Council.

7.2 Identifying search areas

- 7.2.1** To facilitate the process of identifying sites, it is necessary to narrow down the potential search areas in order to more efficiently and effectively identify suitable and sustainable sites that meet the criteria set out in the three-tier approach.
- 7.2.2** Government guidance and the study team's previous experience in undertaking similar site search studies suggests it is essential that new Gypsy and Traveller sites be located near to at the very least three key local services: a doctor, a school and a food shop. Access to a children's play area has also been identified as a key facility, however for the purpose of the initial search area it will be assumed that such a facility can be provided within a site.
- 7.2.3** On the basis of the above, it is proposed that an initial search area be identified using GIS mapping to determine areas within Wiltshire that have access to three key services within at least 1000m, as the crow flies. This is not actual walking distance, which could in some instances exceed 1000m. Actual walking distances to local services and amenities is assessed in Tier 2 of the proposed methodology.
- 7.2.4** The purpose of identifying these initial search zones is to narrow the focus of identifying potentially suitable Gypsy and Traveller sites to areas of Wiltshire where one would likely find good access to services, whilst at the same time allowing for a range of site options to be identified including those in rural and semi-rural locations.
- 7.2.5** It should be noted that should potential sites come forward through the 'call for sites' (see Appendix A) exercise that fall outside these search zones, these sites will still be given consideration against the other site suitability criteria in the proposed methodology.
- 7.2.6** Having identified search areas, aerial photographs are examined to pinpoint potentially suitable candidate sites for Gypsy and Traveller pitches. Consideration is given to the relationship to the nearest settlement, site enclosure, existing landscaping and existing land uses. Sites are then

assessed against policy and environmental constraints, avoiding areas where known hazards exist (such as flood zones and land known to be contaminated) and avoiding land which lies within a nationally or locally recognised designation (such as conservation areas).

- 7.2.7** Using professional judgement and previous experience undertaking similar site searches, areas where one would expect to find potential sites are examined, including those on the edge of the settlement in particular and away from any built-up residential, commercial or industrial areas. Access to a main distributor road may also be a key factor in identifying potential sites. Site investigations will be undertaken by consultants in order to prepare detailed assessments of each potential site. A Site Options Report will outline the full findings of these investigations, identifying preferred site options, alternate site options and rejected site options.
- 7.2.8** Following on-site investigations, potential sites may be immediately eliminated from consideration if they fail to meet basic site topography suitability or were deemed to relate poorly to the surrounding area (i.e. proximity to dangerous installations, poor access, etc.). The study team will make use of a matrix to score each candidate site against the criteria set out in the three-tiered methodology, a template of which can be found in Appendix C of this report. The methodology is summarised further in Sections 7.3, 7.4 and 7.5 below.
- 7.2.9** From the pool of candidate sites, a short-list of suitable preferred site options will be subject to wider public consultation. It will be necessary to ensure the information contained in the matrices is presented in a more user-friendly format, as outlined in the template found in Appendix C of this report.

7.3 Tier 1: Location

The main objective of Tier 1 is to assess the relationship of a candidate site with the nearest settlement. Historically, Gypsy and Traveller and Travelling Showpeople sites are often located on the outskirts of settlements away from a range of services and amenities. However, locations within settlements where conventional residential development would be acceptable should not be ruled out if it satisfies the requirements set out in the criteria-based approach set out below.

Government guidance stresses the importance of providing the Gypsy and Traveller community with access to a range of community services and facilities. Therefore, candidate sites should ideally be located no more than 1200m from a district or neighbourhood centre where a range of local services and facilities can be expected via a safe walking route or where such a route can be provided if one currently does not exist.

If no suitable candidate sites have been identified within the initial 1000m search area, sites beyond 1200m are considered up to a maximum of 2000m.

Candidate sites for Gypsy and Traveller development should ideally be located in suitable areas with adequate access to services such as health, education and shopping facilities. Whilst there is a desire to be located away from built-up areas, national guidance suggests that a range of site options should be considered including those in built-up areas, areas on the outskirts of built-up areas, rural or semi-rural locations and previously developed (brownfield) or derelict land. This is supported by early consultation with officers and the Gypsy and Traveller community along with the findings of the GTAA.

7.3.1 *Policy Constraints / Valued Areas*

It is important to ensure that the quality and character of the countryside is protected and where possible enhanced. Proper regard must therefore be given to areas within Wiltshire that have been designated for their landscape, wildlife or historical qualities and restrain any development that may compromise these designations. However, nationally and locally recognised designations for landscape and nature conservation should not be used in themselves to remove candidate sites from consideration or refuse planning permission for Gypsy and Traveller sites.

It is therefore not reasonable to rule out development in a locally recognised designation area if there is no harmful impact. As with any form of development, candidate sites and planning applications for new Gypsy and Traveller and Travelling Showpeople sites should only be permitted where it can be demonstrated that the objectives of the designation will not be compromised by the development.

In undertaking this study, candidate sites identified for new Gypsy and Traveller and Travelling Showpeople development should avoid adverse impacts on local and national designations, including development plan allocations (existing or emerging), environmental and conservation designations, and any other locally or nationally recognised designations. Candidate sites within a Special Landscape Area, where all forms of development is restricted, should only be taken forward when all other suitable options have been fully explored.

7.3.2 *Environmental Constraints*

A Gypsy and Traveller or Travelling Showpeople site should not be located in areas where conventional bricks and mortar housing would be considered unsuitable. To position a Gypsy and Traveller or Travelling Showpeople site in the vicinity of a hazardous installation or in areas of contaminated land or water with poor drainage without potential for alleviation would be unreasonable. Sites should therefore not be located where there is a significant level of contamination, pollution, flood risk, poor ground stability or poor drainage.

Generally, sites in close proximity to any hazardous installations, motorways, dual carriageways, railway lines and rivers will also be avoided. Mitigation measures can be considered if it can address potential concerns where candidate sites meet the minimum scores for other suitability and sustainability criteria.

7.3.3 *Hazardous Areas & Land / Water Contamination*

As with conventional residential development, caravan sites should not be located within defined safety zones established around installations or operations considered as dangerous to life and health. These may include pipelines, installations handling or storing hazardous materials, industrial or defence premises, and mineral extraction areas.

Caravan sites will not be permitted on sites considered to present health risks through prior contamination of land or water. Where significant contamination issues arise, detailed investigation and risk assessment would be required. This especially applies to the re-use of brownfield sites, which may be appropriate where acceptable remedial measures could overcome any hazards.

7.3.4 *Flood Risk*

There is generally a presumption against most forms of development in areas where a high risk of flooding exists, either from the development itself or from surrounding watercourses, for up to the 1 in 100 year event including the forecast effects of climate change. New development must also not increase the risk of flooding in surrounding areas.

The approach of restricting Gypsy and Traveller pitches in areas of flood risk reflects Government advice contained in *Planning Policy Statement 25: Development and Flood Risk* (PPS25). Given their vulnerability, caravan sites should not be located in areas of high risk of flooding. Generally, PPS25 affirms that caravan development should be refused in Zone 3 where there is a high risk of flooding.

In areas of flood risk where a candidate site has been deemed suitable for development, a risk assessment will be needed to identify the extent of potential flood risk and recommend any possible mitigation measures prior to development of any new Gypsy and Traveller site. The Environment Agency (EA) will be consulted on all proposed sites within and adjacent to a floodplain. The EA will then advise on the acceptability of the proposal in light of all known information and comment on any proposed mitigation measures.

7.3.5 *Ground Stability*

To position Gypsy and Traveller or Travelling Showpeople sites on unstable land without the potential for alleviation would be unreasonable. Often where there is poor drainage or risk of flooding, ground instability occurs. Similarly, where mineral extraction or other activities have taken place, a site's stability can be compromised. Therefore, candidate sites will only be identified in areas that are physically capable of accommodating the new development.

7.3.6 *Poor Drainage*

To position Gypsy and Traveller or Travelling Showpeople sites on land with poor drainage without the potential for alleviation would be unreasonable. Gypsy and Traveller pitches should not be located in areas of poor drainage. Where these problems exist, a flood risk assessment will be prepared prior to development of any new site which will identify risks of flood as well as recommend sustainable drainage systems for the site.

Wherever possible and practical, sustainable drainage systems should be adopted to encourage wildlife and provide visually attractive sites, particularly in rural or edge of settlement locations. Such systems allow for natural drainage to function in the landscape surrounding the site and minimise the potential for flooding.

7.3.7 *Planning History*

Once a candidate site has been identified, a full planning history search is undertaken; however a live consent will not necessarily preclude a site from further consideration. The proposed use of the site for Gypsy and Traveller or Travelling Showpeople development will need to be assessed against the approved use/development and potential impacts.

All suitable sites should be considered appropriate in principle provided there is no specific planning or other constraints limiting development of these sites. A planning history search will be undertaken for each candidate site to identify any potential barriers to development.

Sites that currently have temporary planning permission for use as a Gypsy and Traveller Site will automatically be considered in the assessment of sites process.

7.4 Tier 2: Access and infrastructure

The second tier of assessment examines issues relating to basic physical infrastructure, highway and access issues, and access to social infrastructure. The objective of this phase in the identification process is to ensure a candidate site:

- has on-site access to basic infrastructure, such as water and electricity;
- meets the minimum requirements of the highway authority in terms of safe access and minimal impacts to the existing highway network;
- has access to frequent public transport within a reasonable walking or cycle distance;
- has access to a range of local services and amenities within a reasonable walking or cycle distance; and
- will not result in any undue stresses on existing local physical and/or social infrastructure

7.4.1 *Physical Infrastructure*

To locate a Gypsy and Traveller or Travelling Showpeople site in an area without access to basic infrastructure would be against statutory duties placed on utilities companies (for example, the statutory duties on a water utility company to provide water for domestic purposes).

As with all forms of development the availability of water, electricity and sewage disposal are necessary features of any viable Gypsy and Traveller site. Once a final short-list of suitable candidate sites (preferred options) has been identified, detailed consultations with utility companies will be undertaken to assist with a detailed evaluation of all potential sites that come forward for consideration. As with traditional residential development, the developer, owner or manager of the site will undertake the implementation and associated costs of providing essential infrastructure to Gypsy and Traveller pitches.

Sustainable technologies for the provision of heat and domestic hot water through the use of, for example, Biomass installations (wood chip / wood pellet systems) should be promoted where appropriate. Given the Gypsy and Traveller community's self-reliance, having on-site energy solutions might be attractive.

The capacity of local infrastructure (water, electricity) should be able to accommodate the maximum number of pitches on a site. An assumption at this stage is that if the development is located close to an existing settlement, capacity should exist to accommodate between 10 and 15 pitches. Detailed assessments on capacity issues would be undertaken once a preferred site option is selected.

7.4.2 *Transport Infrastructure*

Providing safe highway access in line with adopted guidance is essential for the operation of a candidate site, for road safety, and for ease of travel. Adequate space, grades and visibility are essential factors in the provision of safe and effective sites. It is desirable that all candidate sites meet the following requirements:

- Access to candidate sites should avoid routes through built-up areas or is available by distributor roads without the need to use more local roads within industrial areas, recognised commercial areas or housing areas.
- The candidate site must be serviced by an independent vehicular access point that adheres to the Highway Authority's guidance and standards in terms of safe entry and egress.
- Safe pedestrian and/or cycle access/route should be provided to the nearest village, town or neighbourhood centre providing a range of services and amenities (or in an area where one such route can be provided).

Candidate sites are also assessed against their distance to public transport via safe walking or cycle route and the frequency of services from the nearest bus stop or transport node. Ideally, sites should be within at least 800m via safe walking route of a public transport node, such as a bus stop, where service is provided at least hourly. This reflects guidance provided by the Institute of Highways & Transportation (IHT) *Guidelines for Providing Journeys on Foot*.

7.4.3 Social Infrastructure

In promoting sustainable development, new Gypsy and Traveller sites will ideally be situated within walking distance of local services and amenities and near to frequent public transport to access jobs, shopping, leisure facilities and services. This reflects ODPM Circular 01/2006 guidance that Gypsy and Traveller sites must be located near to a range of services and amenities.

Distances from candidate sites to social infrastructure reflect the Institute for Highway and Transport's (IHT) *Guidelines for Providing Journeys on Foot*. These are similar standards applied when assessing Local Development Plan candidate housing sites for conventional residential development. These standards for achieving sustainable communities are summarised in Table 8 below:

Walking Distances	Local Facilities *	District Facilities **	Other
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

* includes food shops, public transport, primary schools, crèches, local play areas

** includes employment, secondary school, health facility, community/recreation facilities

Similarly, acceptable distances by cycle route to local services and amenities should conform to IHT's *Guidelines for Providing Journeys by Bicycle* – i.e. 1000m (desirable), 4000m (acceptable), and 8000m (preferred maximum).

7.4.4 Access to Key Local Services

Through various consultation exercises with the local Gypsy and Traveller community and discussion with Officers, and through other similar studies across England and Wales, it has been determined that new permanent sites for Gypsy and Traveller accommodation should be located near to three key local services. These include: primary schools, health facilities, food shops, and children's play

areas. Candidate sites should be within 800m of these services and amenities via a safe walking route. Consideration can be given to the provision of a play area within the site if no existing play area is within the preferred maximum distance.

7.4.5 *Access to Other Local Services*

In addition to the above key local services, consideration is given to access to other local amenities and services including post office, bank, place of worship and public house within at least 800m of a site via safe walking route. This reflects IHT's guidance for acceptable walking distances for local services.

7.4.6 *Access to District Services*

Consideration is also given to the site's relationship to district services and amenities, including secondary schools, dentists, leisure/recreation centres, community centres and other recreation. Ideally these should be no more than 2000m from the site via a safe walking route, reflecting IHT's guidance for acceptable walking distances for district services.

Cycle access from candidate sites to the above local and district services is also assessed. Access to a range of services and amenities should be no more than 8000m of candidate sites via a safe cycle route. This reflects IHT's guidance for acceptable cycle distances.

7.4.7 *Other Considerations*

The relationship of a site with existing Gypsy and Traveller sites (if any) is considered along with what impacts this might have on local physical and social infrastructure, including existing services and amenities. Although it is desirable to avoid the 'ghettoisation' of the Gypsy and Traveller community within a particular area of Wiltshire, consideration must be given to preferred Gypsy and Traveller settlement areas and established local connections through employment and family ties.

7.5 Tier 3: Design and accessibility

7.5.1 *Design and Impact*

A screening assessment for each site option is undertaken, including a brief site appraisal examining, including:

- Overall impact of a Gypsy and Traveller or Travelling Showpeople development on the locality
- Microclimate – if the site's topography or location mean that it is likely to have an exposed or sheltered microclimate
- Topography and Aspect
- Level and Quality of Existing Vegetation – trees, hedgerows, etc and the impact a Gypsy and Traveller development might have on these
- Any other relevant issues

The use of a site for Gypsy and Traveller pitches must be assessed in terms of its potential impact on the surrounding area. The development of Gypsy and Traveller sites should not result in a significant adverse impact on the character and appearance of the locality – this includes the

surrounding countryside, landscape and nearest settlement/dwelling. As with any other form of development, this outcome would not be acceptable. Therefore, Gypsy and Traveller sites should respect the character and appearance of the nearest settlement or surrounding area.

Government guidance expresses the need to consider the needs and interests of the settled community along with those of the Gypsy and Traveller community. The identification of new sites and the granting of future planning permission for sites should therefore avoid any detrimental impact on the amenity of local residents and adjoining land users, including business parks and commercial land uses. Amenity would include local services, facilities, infrastructure, and other aspects that enhance the value of a particular area.

In assessing the impacts resulting from a Gypsy and Traveller or Travelling Showpeople development, the following are considered:

- Nature of any likely impacts on local or national designations (level of impact is likely to be high, medium or low)
- Nature of any likely impacts on the residential amenity of nearby properties (level of impact is likely to be high, medium or low)
- Nature of any likely impacts on the surrounding landscape or character of the locality (level of impact is likely to be high, medium, or low)

As stated in Tier 1 above, sites should not be located where there is a significant level of contamination, pollution or nuisance caused by neighbouring uses including air quality, noise, odour, etc. An assessment is undertaken in Tier 3 to identify any potential environmental health issues relating to poor air quality, noise issues or light nuisance.

7.5.2 *Notional Costing*

An indicative cost for each site option will be reflected in a score value, which will be calculated by taking the considerations listed in Table 9.

The scores in Table 9 represent the level of difficulty associated with securing the site and the likely cost associated with site specific issues. The scores are added to provide a notional cost of taking a suitable site forward for Gypsy and Traveller use. The figure provided would not be a real-world cost, but an indicative theoretical cost of delivering the site.

For the purposes of this study, it will be assumed that the developer of a site (Wiltshire Council, an RSL, or private developer) will cover all costs associated with basic infrastructure provision (road, utility, mitigation, landscaping). DCLG is currently reviewing the grant funding system for Gypsy and Traveller sites, however at this stage it may be possible for Wiltshire Council to secure partial or full funding for new Gypsy and Traveller site. Stage 3 *Options* of the Gypsy and Traveller Site Allocation Study will provide additional information on funding sources for the development of new sites.

TABLE 9: Notional Costing

Cost of Securing Site/ Land Value:
<ul style="list-style-type: none"> Land already in the ownership of the Gypsy and Traveller community will have no value (0) Land in the Council's ownership or in the ownership of another public body, where that body is willing to release the site for Gypsy and Traveller use, will have a nominal land value (+1) Land in the ownership of another public body or a landowner unwilling to sell the site for Gypsy and Traveller use will have a market land value (+2) and may require compulsory purchase
Cost of Road Layout:
<ul style="list-style-type: none"> Where existing road layout/infrastructure can be used, the cost will be none (0) Where minimal road layout/infrastructure are required, the cost will be nominal (+1) Where significant road layout/infrastructure works must be undertaken, the cost will be high (+2)
Cost of Utility Connection:
<ul style="list-style-type: none"> Where an existing connection exists, the cost will be none (0) Where a connection can be made within 100m of the site, the cost will be nominal (+1) Where a connection is only possible beyond 100m, the cost will be high (+2)
Cost of Landscaping:
<ul style="list-style-type: none"> Where there is sufficient landscaping already present for adequate screening, the cost will be none (0) Where minimal additional landscaping must be implemented for adequate screening, the cost will be nominal (+1) Where significant additional landscaping is required for adequate screening, the cost will be high (+2)
Cost of Mitigation:
<ul style="list-style-type: none"> Where there is no need for mitigation due to land contamination, flooding, poor drainage, poor ground stability, the cost will be none (0) Where there is a need for mitigation for one of (land contamination, flooding, poor drainage, poor ground stability) the cost will be nominal (+1) Where there is a need to mitigate more than one of (land contamination, flooding, poor drainage, poor ground stability) the cost will be high (+2)

For the purposes of this study, it will be assumed that the developer of a site (Wiltshire Council, an RSL, or private developer) will cover all costs associated with basic infrastructure provision (road, utility, mitigation, landscaping). DCLG is currently reviewing the grant funding system for Gypsy and Traveller sites, however at this stage it may be possible for Wiltshire Council to secure partial or full funding for new Gypsy and Traveller site. Stage 3 *Options* of the Gypsy and Traveller Site Allocation Study will provide additional information on funding sources for the development of new sites.

7.5.3 Deliverability

At this stage it is not known how much of the identified need for additional Gypsy and Traveller pitches will be delivered privately or publicly. It can be assumed that a range of tenure will be required. The Council, independently or in partnership with RSLs, will be required to provide an element of affordable pitches for members of the Gypsy and Traveller community unable to purchase their own plots.

Evidence however suggests a preference for privately owned and managed sites and it is therefore reasonable to assume that the acquisition and development costs will be incurred by the Gypsy and Traveller community.

Regardless of who might develop a site, its ease of acquisition must be considered along with an initial assessment of what barriers to development/ deliverability might be encountered for each candidate site. For example, sites that are in Council ownership and available for purchase will be easier to acquire for Gypsy and Traveller or Travelling Showpeople use than those sites in private ownership where a landowner may be unwilling to sell land for Gypsy and Traveller use. The use of Compulsory Purchase Order powers by Wiltshire Council should only be used as a last resort should no suitable site come forward for development.

Detailed costing for each candidate site can only be provided once a layout of the proposed development is prepared for each site option.

Question GTQ3

Site selection methodology

Do you agree with this proposed site selection methodology?

Question GTQ4

Call for sites

This stage of the Gypsy and Traveller Site Allocations DPD allows for potential sites to be submitted for consideration. Are you aware of any sites/land that might be suitable for Gypsy and Traveller pitches and/or plots for Travelling Showpeople?

Please see Appendix A for details on how to submit potential sites.

Question GTQ5

Any other comments.

Do you have any other comments on any part of this consultation document?

8 What happens next?

8.1 Stage 1: General approach

The publication of the Issues and General Approach Report for consultation represents the end of the first stage in the preparation of the Gypsy and Traveller Site Allocations Development Plan Document. The Issues and General Approach report has:

- Summarised the evidence gathered to date, building toward a robust base for subsequent stages of the study;
- Outlined a proposed draft methodology for identifying and assessing suitable candidate sites to meet accommodation needs of Gypsies and Travellers and Travelling Showpeople in Wiltshire.

8.2 Stage 2: Issues

The second stage of the study will be to build on the evidence base already collected by responding to comments raised during consultation at Stage 1. It will include further consultation with key stakeholders to develop the issues and concerns raised in the first stage of consultation. It is anticipated that Stage 2 of the study will include:

- Agreement of the proposed methodology for identifying and assessing suitable Gypsy, Traveller and Travelling Showpeople sites.
- Consultation Report on Stage 1.

8.3 Stage 3: Options

The Options Report will provide a robust criteria-based policy for testing potential for Gypsy and Traveller and Travelling Showpeople sites in Wiltshire and set out the policy options for inclusion in the Gypsy and Traveller Site Allocations DPD. A short-list of candidate sites from the sites submitted during Stage 1, to meet the identified need for Gypsy, Traveller and Travelling Showpeople accommodation, will be identified. The Options Report will be subject to an 8-week public consultation with key stakeholders and the wider public.

8.4 Stage 4: Preferred option

This is the final stage of the DPD preparation before examination by an independent inspector and adoption into policy. Following consideration of all the comments submitted during each of the initial stages of consultation this document will present proposed site allocations and criteria based policies for the assessment of new sites.

A public consultation on the Submission Document is scheduled for the Spring of 2011. This consultation will focus on the process of policy development to ensure that the allocations and policy outcomes of the DPD are based on a robust consultation process and sound evidence.

Appendices

A - Call for sites

1.1 Call for Sites

- 1.1.1 As part of Wiltshire Council's Local Development Framework (LDF), the Council is preparing a plan on how to provide enough sites for Gypsies, Travellers and Travelling Showpeople.
- 1.1.2 The Gypsy and Traveller Site Allocations DPD will set out how decisions will be made on where gypsy, traveller and travelling Showpeople sites will be located. The DPD will also allocate land for Gypsy, Traveller and Travelling Showpeople sites, to meet the identified shortfall of authorised accommodation in Wiltshire.
- 1.1.3 As part of this work, Wiltshire Council is inviting submissions of potential sites for Gypsy, Traveller and Travelling Showpeople.
- 1.1.4 The enclosed 'Call for Sites' pro-forma should be completed as full as possible and submitted to the Council by the end of the public consultation on **Friday 6 June 2010**.
- 1.1.5 Please note that by giving this information you are accepting that the information can be available to view by any other person, under the Freedom of Information Act (2000). The submission of potential sites will be assessed against the approved site selection methodology and it should be noted that a submitted site will not necessarily be included in the Options Report (Stage 3). The Council reserves the right to decide which sites are included in this document.

1.2 Issues to be considered when submitting a site

- 1.2.1 Any sites submitted to the Council for consideration as potential sites for Gypsies, Travellers and Travelling Showpeople should have regard to Section 7 (Proposed Site Selection Methodology) and Appendix B (Proposed Scoring Matrix) of this report.
- 1.2.2 Preferably sites should be in or near to existing settlements with access to local services. This does not mean that sites in more remote and rural locations will not be considered.
- 1.2.3 Although not essential, it would be of assistance if any plans or photographs of the site could be attached to the submission material.
- 1.2.4 Submissions should where possible outline the number of pitches the site could provide.

1.3 What Happens Next?

1.3.1 All submissions must be received by **Friday 6 June 2010** in order to be considered for assessment.

1.3.2 Please send the completed pro-forma and any support documents to:

Spatial Plans Team (Gypsy and Traveller DPD)
Economy & Enterprise
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

Tel: 01225 713489

1.3.3 Land or sites can be submitted online via either the online consultation facility at: <http://consult.wiltshire.gov.uk/portal>, or via the council's website at www.wiltshire.gov.uk/gypsyandtravellersdpd.

1.3.4 Following the 8 week public consultation period, the Spatial Plans Team will consider all submitted sites. All submissions will be acknowledged.

B - Proposed scoring matrix

TIER 1 - LOCATION Sites must score the minimum outlined below to move to Tier 2				
Issue		Score	Min	Notes
1. The Site				
1a. Is Site located within the Search Zone?	Yes	+1	YES (+1)	The purpose of the initial search zone is to narrow the focus of the search pattern to areas of the County where suitable sites are likely to be found. Search areas are identified using the following criteria: <i>Sites must be within 1000m (as the crow flies) of a school, general practitioner/medical centre and food store.</i> However, if a site located outside the search zone comes forward it will not be excluded from further consideration.
	No	0		
1b. Site Location and Size	Specify Site Location Total Site Area		-	
1c. Current Land Use	Use Brownfield or Greenfield?		-	Preference would be given to Brownfield sites in sustainable locations (to be determined through other tests)
1d. Raw Capacity of the Site	Guidelines: Double Permanent Pitch = 500 sq m Single/Transit Pitch = 250 sq m		-	Identify a raw capacity for the site and assess whether or not this would satisfy the required need for additional pitches within the County. ODPM Circular 01/2006 does not stipulate an ideal site size; however DCLG's <i>Designing Gypsy and Traveller Sites - A Good Practice Guide</i> states sites should accommodate no more than 15 pitches.
	Permanent Gypsy/Traveller Site Transit Gypsy/Traveller Site Temporary Gypsy/Traveller Site Travelling Showpeople Site	+1 0	YES (+1)	
1e. The identified capacity meets the required need for a:				

TIER 1 - LOCATION
Sites must score the minimum outlined below to move to Tier 2

2. Relationship to Settlements

<p>2a. Site is located within a safe walking (or where one can be made available) of a Local Centre</p>	Within 200m	+4	+1	<p>A Local Centre is defined as a neighbourhood centre, district centre, village centre, or town centre offering a range of services and amenities. This conforms to IHT Guidelines for Providing Journeys on Foot.</p>
	Within 400m	+3		
	Within 800m	+2		
	Within 1200m	+1		
<p>2b. Site is located within a safe cycle route (or where one can be made available) of a Local Centre</p>	Within 1000m	+3	+1	<p>A Local Centre is defined as a neighbourhood centre, district centre, village centre, or town centre offering a range of services and amenities. This conforms to IHT Guidelines for Providing Journeys by Bicycle.</p>
	Within 4000m	+2		
	Within 8000m	+1		
<p>2c. How does the site relate to the existing settlement?</p>	Within Existing Settlement Boundary	+4	+1	<p>Out of settlement locations will only be awarded a point if the site relates well to existing services and amenities.</p>
	Rounding off Settlement	+3		
	Edge of Settlement	+2		
	Out of Settlement	+1		

3. Policy Constraints

<p>3a. Green Belt/Green Wedge.</p>	Yes	0	NO (+1)	<p>A presumption against Gypsy/Traveller development in the Green Belt /Wedge is made. However, in line with ODPM Circular 01/2006, sites within the Green Wedge can be considered although should only be taken forward when all other options are full exhausted.</p>
	No	+1		
<p>3b. Is the site located within any Valued Areas</p>	Yes	0	NO (+1)	<p>Ideally candidate sites should be located outside the designations outlined. Where sites are located nearby or adjoining these designations, mitigation might address any potential harmful impacts and as such will be considered further.</p>
	No	+1		
<p>3c. Impact on the above can be minimised through mitigation or sensitive design.</p>	Yes	+1	YES (+1)	<p>Proposals will only be considered further if it can be demonstrated that issues or concerns can be addressed through sensitive design or appropriate mitigation secured by planning conditions or S106. Internationally or Nationally Recognised Designations:</p>
	No	0		

TIER 1 - LOCATION

Sites must score the minimum outlined below to move to Tier 2

				<ul style="list-style-type: none"> Area of Outstanding Natural Beauty (AONB), Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Scheduled Ancient Monuments, Landscapes, Parks and Gardens of Special Historical Interest, Landscapes of Outstanding Historical Interest, World Heritage Sites, Regionally Important Geological/Geomorphological sites, Other International/National Designation <p>Locally Recognised Designations:</p> <ul style="list-style-type: none"> Conservation Areas, Special Landscape Area, Important Countryside Frontages, Listed Buildings (curtilage or setting of), Archaeological Sites, Tree Preservation Orders, Protected Mineral Workings, Waste Safeguarding Areas, Sustainable Transport Protection Zones, County Wildlife Sites, Biodiversity Action Plan areas, Ancient Woodland, Other Local Designations <p>(The list is not exhaustive and can include any existing or future designations)</p>
4. Environmental Constraints				
<p>4a. Hazardous Areas / Significant Constraint to Development.</p>	<p>Yes No</p>	<p>0 +1</p>	<p>NO (+1)</p>	<p>Candidate sites should not be located in areas deemed unsuitable for conventional bricks and mortar residential housing use, either private or social.</p> <p>Sites should not be considered if they are near refuse sites or facilities, industrial locations and other hazardous locations such as those indicated.</p> <p>This includes:</p> <ul style="list-style-type: none"> Flood Zone / Floodplain / River, Poor Ground Stability, Poor Drainage, Topography, Contaminated Land, Hazardous Installations, Poor Highway Safety, Motorway Flyovers, Dual, Carriageway, Railway
<p>4b. Above can be addressed through mitigation or sensitive design of the site.</p>	<p>Yes No</p>	<p>+1 0</p>	<p>YES (+1)</p>	<p>Proposals will only be considered further if it can be demonstrated that issues or concerns over health and safety can be addressed through sensitive design or appropriate mitigation secured by planning conditions or S106.</p>

TIER 1 - LOCATION Sites must score the minimum outlined below to move to Tier 2				
5. Planning History				
Does the site or part of the site have any valid planning permissions?	Application Number Application Type Decision Details	YES/NO	-	Impact should be assessed and implications of any existing or pending planning application. A live planning consent does not remove a site from further consideration.
5b. Is the principle of a Gypsy/Traveller development on this site acceptable?	Yes No	+1 0	YES (+1)	
TOTAL TIER 1 SCORE MIN 9				
DOES THE SITE ADVANCE TO TIER 2? YES/ NO				

TIER 2 - ACCESS AND INFRASTRUCTURE
Sites must score the minimum score identified to proceed to Tier 3

Issue	Score	Min	Notes
1. Physical Infrastructure			
1a. Basic infrastructure (water, electricity) is available on site or within a reasonable distance away from the site to enable a practical connection.	Yes	+1	Details of local infrastructure must be provided, including any capacity issues, how far the nearest connection is, and feasibility of connection. It would be based on the recommendation of utility providers as to whether or not a connection is practical.
	No	0	
1b. Basic infrastructure has the capacity to serve the maximum site capacity.	Yes	+1	A similar approach to residential development where no connection to basic infrastructure is available on the site will be used.
	No	0	
1c. If No, mitigation measures that can be taken to address issues.	Yes	+1	
	No	0	
2. Transport Infrastructure			
2a. The site can be serviced by independent vehicular access point, which adheres to the Highway Authority's guidance and standards.	Yes	+1	
	No	0	
2b. Access avoids routes through built-up areas or is available by distributor roads without the need to use more local roads within industrial areas, recognised commercial areas or housing areas.	Yes	+1	
	No	0	
2c. Existing highway network is capable of accommodating proposed traffic movements.	Yes	+1	
	No	0	
2d. The site has a safe pedestrian and/or cycle access/route to the nearest local area centre (or could one be provided).	Yes	+1	
	No	0	
2e. The site has good, reasonably direct access to key routes out of the nearest town/city.	Yes	+1	This consideration would only be applied to candidate sites under consideration as a new transit site for the County.
	No	0	

TIER 2 - ACCESS AND INFRASTRUCTURE
Sites must score the minimum score identified to proceed to Tier 3

<p>2f. Access to a transport node is provided via a safe walking route:</p>	<p>Within 200m of the site Within 400m of the site Within 800m of the site</p>	<p>+3 +2 +1</p>	<p>+1</p>	<p>This can be either a bus stop or rail stop or community share service. This reflects guidance within the Institute of Highways & Transportation (IHT) Guidelines for Providing Journeys on Foot.</p>
<p>2g. The nearest public transport node provides:</p>	<p>Half-hourly public transport service Hourly public transport service</p>	<p>+2 +1</p>	<p>+1</p>	
<p>3. Social Infrastructure</p>				
<p>3a. Access to <u>key</u>* local facilities is provided (actual walking distance):</p> <p>* these are services and amenities that are deemed to be essential for the Gypsy/Traveller community as determined from similar study's elsewhere and through consultation with the Gypsy/Traveller community.</p>	<p>Within 200m of the site Within 400m of the site Within 800m of the site</p>	<p>+3 +2 +1</p>	<p>+1</p>	<p>The site must be within the specified distance of <u>at least 3</u> the following key Local Amenities:</p> <ul style="list-style-type: none"> ● <i>Food Shop</i> – a supermarket or village shop where a range of products are available for purchase; a restaurant or take-away will not qualify as a food shop ● <i>Doctor's Surgery</i> ● <i>Primary School</i> ● <i>Children's Play Area</i> – will only classify as such if it is a clearly defined and designated publicly available play area (or alternatively points can be awarded if such a play area can be provided within the site) <p>Reflects ODPM Circular 01/2006 guidance that Gypsy/Traveller sites must be located near to a range of services and amenities. Also reflects IHT guidance for acceptable walking distances.</p>
<p>3c. Access to district services/amenities is provided by safe walking route: (actual walking distance)</p>	<p>Within 500m of the site Within 1000m of the site Within 2000m of the site</p>	<p>+3 +2 +1</p>	<p>-</p>	<p>The site should be within the specified distance of <u>at least 1</u> of the following Local Amenities:</p> <ul style="list-style-type: none"> ● <i>Secondary School, College or other higher education</i> ● <i>Medical Centre, Hospital, Dentist</i> ● <i>Leisure/Recreation Centre</i> – must be open for public use although an entry fee may be charged (i.e. not a subscription).

TIER 2 - ACCESS AND INFRASTRUCTURE

Sites must score the minimum score identified to proceed to Tier 3

					<ul style="list-style-type: none"> Community Centre Outdoor open access public area – can be a public park, village green or any other type of outdoor amenity area with unrestricted public access. <p>Reflects ODPM Circular 01/2006 guidance that Gypsy/Traveller sites must be located near to a range of services and amenities. Also reflects IHT guidance for acceptable walking distances.</p>
3d. Access to local amenities/services is provide by safe cycle route:	Within 1000m Within 4000m Within 8000m	+3 +2 +1	+1		Reflects IHT guidance for acceptable cycle distances.
4. Other Considerations					
4a. Is the site located within 1000m of other Gypsy/Traveller pitches/sites?	Yes No	0 +1	+1		Other pitches can be authorised or unauthorised or potential future allocations.
4b. If Yes, what is the total number of pitches?	Number of Pitches		N/A		Identify total number of unauthorised/authorised pitches within 1000m of a proposed site, including any proposed allocations.
4c. Would there be any harmful impact to local physical/social infrastructure should additional pitches be permitted?	Yes No	0 +1	+1		Provide explanation of what infrastructure impacts might result from allowing additional pitches – e.g. impact on physical infrastructure such as sewage/water capacity and impact on social infrastructure such as capacity of schools.

TOTAL TIER 2 SCORE MIN 10

DOES THE SITE ADVANCE TO TIER 3? YES/ NO

TIER 3 - DELIVERABILITY, DESIGN AND IMPACT
Sites achieving the highest Tier 3 scores will be identified as suitable site options or alternatives options for consideration.

Issue	Score	Desired	Notes
1. Design and Impact			
1a. Site Analysis	The overall suitability of the site for Gypsy/Traveller use (either for permanent, transit or temporary use) reflect guidance in ODPM Circular 01/2006 and DCLG's <i>Designing Gypsy and Traveller Sites - A Good Practice Guide</i> . Sites should have a natural/logical boundary, or where one is proposed it must be sensitive to the character/appearance of its surroundings. Sites should not be visually intrusive.		
1b. Level and Nature of Impact on:	Considerations: overall impact, microclimate, topography, aspect, level and quality of existing vegetation (trees, hedgerows, etc), emergency response times, relationship to services/amenities, other issues		
	Policy/Environmental Designations	High, Medium, Low	0, +1, +2
	Residential Amenity	High, Medium, Low	0, +1, +2
	Landscape Impact	High, Medium, Low	0, +1, +2
1c. Where Medium/High in any of the above, mitigation measures address concerns.	YES/NO	YES (+1)	The development of candidate sites for Gypsy/Traveller pitches will only be permitted in areas where there would be no impact on policy designations (adopted or emerging), nationally/locally recognised environmental designations, residential amenity, the surrounding landscape and the character/appearance of the locality, including Conservation Areas. An assessment is undertaken on the level and nature of any impacts. Where appropriate, consideration may be given to possible mitigation that could address potential harmful impacts.
1d. Environmental Health	Air Quality Issues	YES/NO	NO (+1)
	Potential Light Nuisance	YES/NO	NO (+1)
	Potential Noise Issues	YES/NO	NO (+1)
1e. Other appropriate uses can be accommodated within the site.	YES/NO	YES (+1)	Gypsy/Traveller sites are more susceptible to air quality, light and noise issues. Consideration must be given to the impact of these issues on the health and well-being of occupiers of a candidate site. Should issues exist, mitigation measures can be considered. Must be appropriate to the location and can include: visitor pitches, shared amenity block, play area, work vehicle parking, stables, etc.
1f. On balance, would the candidate site be suitable for:	Permanent Gypsy/ Traveller Use	YES/NO	YES (+1)
	Transit Gypsy/ Traveller Site	YES/NO	YES (+1)
	Travelling Showpeople Site	YES/NO	YES (+1)

TIER 3 - DELIVERABILITY, DESIGN AND IMPACT

Sites achieving the highest Tier 3 scores will be identified as suitable site options or alternatives options for consideration.

2. Deliverability

<p>2a. Ease of Acquisition</p>	<p>Site Ownership* Available for Purchase? Is the use of Compulsory Purchase likely</p>	<p>0-3 YES/NO YES/NO</p>	<p>- YES (+1) NO (+1)</p>	<p>*Site ownership: ● Council: +3 ● Gypsy/ Traveller: +2 ● Other public body: +1 ● Private: 0 **Land value: ● Gypsy/ Traveller: None (0) ● Council/ Public: Nominal (+1) ● Private: Market (+2) When assessing cost: ● Existing works/conditions can be used: 0 ● Minimal infrastructure/mitigation works are required: +1 ● Significant infrastructure/mitigation works required: +2</p>
<p>2b. Notional Cost</p>	<p>A - Land Value** B - Utility Connection C - Road Infrastructure D - Landscaping E - Mitigation</p>	<p>0-2 0-2 0-2 0-2 0-2</p>	<p>N/A</p>	
<p>Total Notional/ Indicative Cost (A+B+C+D+E)</p>		<p>X</p>	<p>N/A</p>	

TOTAL TIER 3 SCORE and COST MIN 11

FINAL RECOMMENDATION: SITE OPTION/ ALTERNATE/ REJECTED

C - Suggested site identification/ assessment template

SUGGESTED SITE IDENTIFICATION/ ASSESSMENT TEMPLATE	
Site Appraisal	
Site Number	Reference number provided for each site
Site Name / Address	If applicable
Location	Nearest Settlement to the Site and Site Plan
Site Size	The area of the site in hectares
Current Land Use	Is the site Greenfield or previously developed land (Brownfield)?
Raw Capacity of the Site	The number of pitches that are proposed on the candidate site (where there is current Gypsy and Traveller use on a site, the number of existing pitches is also given)
Site Description & Context	A description of the character and appearance of the site and that of the surrounding area
Tier 1: Location and Constraints	
Relationship to Settlements	<ul style="list-style-type: none"> Is the site located within a safe walking (or where one can be made available) of a Local Centre? (ideally within 1200m) Is the site located within a safe cycle route (or where one can be made available) of a Local Centre? (ideally within 8000m)
Key Social Infrastructure	<ul style="list-style-type: none"> Is the site located within 1000 or 2000 metres of a primary school, a doctor's surgery, and a food shop? (as the crow flies)
Policy Constraints	<ul style="list-style-type: none"> Is the site within the Green Belt? Is the site within or in close proximity to any valued area(s) including internationally/nationally/locally recognised designations? If so, can any of the above be addressed through mitigation or through sensitive design?
Environmental Constraints	<ul style="list-style-type: none"> Is the site within or in close proximity to a hazardous area(s) or any significant constraint to development? If so, can this be addressed through mitigation or through sensitive design?
Planning History	<ul style="list-style-type: none"> Any relevant planning history for the site or part of the site Is the principle of a Gypsy and Traveller development on the site acceptable?
Tier 1 Conclusion	<ul style="list-style-type: none"> Summary of Findings Does the site warrant further consideration?
Tier 2: Access & Infrastructure	
Transport Infrastructure	<ul style="list-style-type: none"> Can the site be serviced by independent vehicular access point, which adheres to the Highway Authority guidance/standards? Does access to the site avoid routes through built-up areas or is available by distributor roads without the need to use more local roads within industrial areas, recognised commercial areas or housing areas? Is the existing highway network capable of accommodating the proposed traffic movements? Does the site have a safe pedestrian and/or cycle access/route to the nearest local centre? (If not, could one be provided?)

	<ul style="list-style-type: none"> Is access to a transport node provided via a safe walking route? (ideally within 400m or at least 800m) What level of service does the nearest transport node provide? (ideally access to at least an hourly service)
Site Infrastructure	<ul style="list-style-type: none"> Are utilities (water, electricity, drainage) available on site or within a reasonable distance away from the site to enable a practical connection? Does the basic infrastructure have the capacity to serve the maximum site capacity? (If no, are there measures that can be taken to address this?)
Social/Local Infrastructure	<ul style="list-style-type: none"> Is there access to key local service/amenity? Is there access to at least 1 other local service/amenity? Is there access to at least 1 district service/amenity?
Other Considerations	<ul style="list-style-type: none"> Is the site located within 1000m of other Gypsy and Traveller pitches/sites? If yes, how many pitches? If yes, would there be any harmful impact to local physical/social infrastructure should additional pitches be permitted? Can the site accommodate Travelling Showpeople needs in terms of access to key routes, additional on-site storage, etc?
Tier 2 Conclusion	<ul style="list-style-type: none"> Summary of Findings Does the site warrant further consideration?
Tier 3: Impact, Design and Deliverability	
Design and Impact	<ul style="list-style-type: none"> Site Analysis / Overall Impact / Overall Suitability Level and nature of impact on Policy/Environmental Designations, Residential Amenity, Landscape Impact Environmental Health considerations – air quality, light nuisance, noise issues On balance, would the candidate Site be suitable for: <ul style="list-style-type: none"> Permanent Gypsy/Traveller Use Transit Gypsy/Traveller Use Travelling Showpeople Use?
Deliverability	<ul style="list-style-type: none"> Time of potential delivery (short, medium, long-term) Land ownership Ease of Acquisition Notional Cost – cost of security site (including land value), cost of demolition/clearing, cost of road layout, cost of utility connection, cost of landscaping, cost of mitigation, total cost (notional, not a real world figure)
Tier 3 Conclusion	<ul style="list-style-type: none"> Summary of Findings
Recommendation	<ul style="list-style-type: none"> Site Option, Alternate Option, Rejected Option

Note: Maximum walking/cycle distance indicated above is based on IHT guidance - actual walking/cycle distance to reflect IHT guidance or other adopted/approved guidance.

D - Glossary

ABBREVIATIONS	
BRE	British Research Establishment
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EA	Environment Agency
EiP	Examination in Public
DPD	Development Plan Document
GTAA	Gypsy and Traveller Accommodation Needs Assessment
LDD	Local Development Document
LDF	Local Development Framework
LPA	Local Planning Authority
ODPM	Office for the Deputy Prime Minister (now DCLG)
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RPB	Regional Planning Board
RPG	Regional Planning Guidance
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SPG	Supplementary Planning Guidance

DEFINITIONS

1 in 100 year flood event	A flood event with a 1% annual probability of occurrence.
1% annual probability flood	The flood event has a 1% chance of occurring in any one year.
Amenity Block	There is no single definition of an amenity building. However, the overall size will depend on the size of the family, while draft government guidance states that a minimum they should include: hot and cold water; electricity supply; separate toilet; a bath/shower room and a kitchen dining area.
Brownfield	Land or premises which has previously been used or developed and is not currently fully in use, although it may be partially occupied or utilised.
Caravan	A caravan is any structure designed or adapted for human habitation that is capable of being moved from one place to another.
Department of Communities Local Government	The Department for Communities and Local Government who set the policies on local government, housing, urban regeneration, planning and fire and rescue.
Development Plan Document	Statutory document having been through Independent Examination, which forms part of the LDF.
Examination in Public	Inquiry lead by an independent Planning Inspector into proposals for and objections to LDDs
Family Site	A private caravan site owned and occupied by an (extended) family. Broadly equivalent to owner-occupation in mainstream housing.
GTAA	Sub-regional assessment of the accommodation needs and aspiration of Gypsies and Travellers across Wiltshire and Swindon, completed in 2006.
Gypsy and Traveller	This document contains the definition of this ethnic group as provided by government Circular 01/2006.
Highway Authority	A local authority with responsibility for the maintenance and drainage of highways maintainable at public expense. The highway authority sets standards for adoptable roads.
Local Development Document	Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs)
Local Development Framework	The LDF sets out the planning framework for the local area. LDFs will replace existing Local Plans
Mitigation	Ways and measures of reducing the effects of, for example, flooding, ground instability or poor drainage.
Not Tolerated Sites	Sites on land owned by Gypsies and Travellers that do not have planning permission and are subject to enforcement action.
ODPM Circular 01/2006	Updated Government guidance on the planning aspects of finding sites for Gypsies and Travellers and how local authorities and Gypsies and Travellers can work together to achieve that aim. This replaces Circular 01/94: Gypsy Sites and Planning.
Pitch	Area of a Gypsy and Traveller site where a single household live in their caravans (trailers). Pitches may vary between large enough for one residential trailer (or mobile home) and one touring (small) trailer spacious enough to hold one or two large mobile homes and several 'tourers' as well as working vehicles.

Plot	The terms used with reference to Travelling Showpeople sites. A piece of ground large enough to accommodate a single accommodation unit, and may include space for the storage and maintenance of equipment. A group of plots may be referred to as a yard.
Regional Spatial Strategy	The RSS sets out the long term planning strategy for the Wiltshire and the South West region for the period 2006 and 2026.
Registered Social Landlord	Not-for-profit organisations that can bid for regional funding to establish and run Gypsy and Traveller sites.
Residential Site/Pitch	A site/pitch intended for long-stay use by residents. No maximum length of stay is set unless permission is temporary.
Section 106	Planning agreements that secure contributions (in cash or in kind) to the infrastructure and services necessary to facilitate proposed developments.
Site	An area of land laid out and used for Gypsy, Traveller and Travelling Showpeople. Sites vary in type and size and can range from one-caravan private family sites on Gypsy and Traveller's own land to large scale private and local authority sites.
Study Team	Refers to planning consultants commissioned to assist the Council in the preparation of the Gypsy and Traveller Site Allocations DPD.
Tolerated Sites	Sites on land owned by Gypsies and Travellers that do not have planning permission, but which are not subject to enforcement proceedings (the Council has taken a decision not to seek removal of the encampment/development).
Transit Site	Authorised Gypsy and Traveller site intended for short-term use by those in transit to other areas. The site is permanent, but people who stay on it may only do so for a temporary period. Such sites usually have fewer facilities than permanent residential sites.
Travelling Showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such. This includes such persons who on the grounds of their own or their family's dependents' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently.
Unauthorised Development	A Gypsy and Traveller site established on gypsy and traveller owned land without appropriate planning permission or site licence.
Unauthorised / Illegal Encampments	A piece of land where Gypsies and Travellers reside without planning permission. The land is not in the ownership of those involved in the encampment.
Valued Areas	Areas of special character, landscape, historical or ecological importance that may or may not be officially designated. These included Scheduled Ancient Monuments, Historic Landscapes, Special Landscape Areas, Conservation Areas and other national/local designations.

