Working towards a Core Strategy for Wiltshire

Draft topic paper 18: Gypsy and Travellers

Wiltshire Core Strategy Consultation June 2011
Wiltshire Core Strategy

Gypsy and Traveller Topic Paper 18

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1.0 Introduction

1.1 Wiltshire Council is committed to meeting the needs of its travelling communities, this includes Gypsy and Travellers and Travelling Showpeople. Core Policy 31 sets out the pitch requirements for Gypsies and Travellers within Wiltshire between 2006 and 2016. This equates to 93 permanent pitches, 27 transit pitches and 5 plots for Travelling Showpeople.

1.2 This Topic Paper explains the context surrounding these targets and sets out how evidence and background information have informed the approach outlined in the Core Strategy consultation document.

1.3 The current definition of Gypsy and Travellers is provided by ODPM Circular 01/2006 ‘Planning for Gypsy and Traveller Caravan Sites’. This defines Gypsy and Traveller’s as:

“...Persons of nomadic habitat of life whatever their race of origin, including such persons who on grounds only of their own or their family’s or dependents’ education 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.”

1.4 In addition, further guidance is provided in Circular 04/2007 to define Travelling Showpeople. This defines 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 dependents’ more localised pattern of trading, education 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”

2.0 Determining the target.

2.1 The Housing Act 2004 requires local authorities to plan for the accommodation needs of travelling communities by undertaking a survey of need through the Gypsy and Traveller Accommodation Assessment (GTAA). The Wiltshire and Swindon GTAA, published in February 2006, identified the pitch requirements for Gypsies and Travellers for the period 2006 to 2011. Table 1 shows the pitch requirements identified through the GTAA process.

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2 ODPM Circular 04/2007 Planning For Travelling Showpeople.
<table>
<thead>
<tr>
<th>Area</th>
<th>GTAA Identified Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wiltshire</td>
<td>24 Pitches</td>
</tr>
<tr>
<td>Salisbury</td>
<td>9 Pitches</td>
</tr>
<tr>
<td>Kennet</td>
<td>0 Pitches</td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>7 Pitches</td>
</tr>
<tr>
<td>Total</td>
<td>40 Pitches</td>
</tr>
</tbody>
</table>

2.2 Based on guidance set out in Circular 01/2006 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

2.3 Circular 01/06 requires local planning authorities to make provision for the accommodation needs of Gypsies and Travellers as set out in the Regional Spatial Strategies (RSS) through the Local Development Framework. Paragraph 23 is clear that “the RSS revision should identify the number of pitches required (but not their location) for each local planning authority in the light of the GTAA and a strategic view of needs across the region.

2.4 The information provided by the Wiltshire GTAA fed into the overall assessment of need which informed the policies of the Draft RSS for the south west. During the RSS ‘Review of Additional Pitch Requirements for Gypsies and Travellers’ Examination in Public (EiP) (March 2008), the Wiltshire and Swindon GTAA was heavily criticised. It was found that the GTAA was not robust and produced an unreasonably low estimate of need. The figures identified through the GTAA were questioned for various reasons; including a number of sites were overlooked; accuracy of the base population; temporary permissions were about to expire; assumed future vacancy rates, the treatment of need from unauthorised sites and the GTAA failed to take in to account the strength of enforcement action which displaced need to elsewhere.

2.5 The Secretary of State published the Proposed Changes to the draft RSS in December 2007 with an increased pitch requirement within Wiltshire. This requirement was based on the following geographical distribution of pitches across the former district authority areas.

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3 The need for 24 pitches in North Wiltshire included the need to replace a temporary site of 16 pitches at Minety. Since the GTAA was completed the site at Minety has been given full permission.
Table 2: Distribution of need

<table>
<thead>
<tr>
<th>Area</th>
<th>Permanent pitches</th>
<th>Transit pitches</th>
<th>Travelling Showpeople Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wiltshire</td>
<td>48</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td>Salisbury</td>
<td>18</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>14</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Kennet</td>
<td>5</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>85</strong></td>
<td><strong>27</strong></td>
<td><strong>5</strong></td>
</tr>
</tbody>
</table>

2.7 Permanent Gypsy and Traveller sites granted planning permission since April 1 2006 can be counted towards the need identified through the Draft RSS. On this basis Table 3 provides a summary of the residual need judged against the Draft RSS requirements.

Table 3: Residual Need

<table>
<thead>
<tr>
<th>Area</th>
<th>Permanent pitches</th>
<th>Transit pitches</th>
<th>Travelling Showpeople Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wiltshire</td>
<td>28</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td>Salisbury</td>
<td>17</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>10</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Kennet</td>
<td>5</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>60</strong></td>
<td>TBC</td>
<td><strong>5</strong></td>
</tr>
</tbody>
</table>

3.0 Future Revocation of Regional Strategies.

3.1 The Communities and Local Government (CLG) Secretary of State, Eric Pickles, announced on the 27 May 2010 the intention of the Coalition Government to abolish Regional Strategies and return decision making powers on housing to local councils. This announcement confirmed that decisions on housing supply (including the provision of travellers sites) will rest with Local Planning Authorities without the framework of regional numbers and plans.

3.2 In order to plan for the future provision for Wiltshire’s travelling communities the CLG has provided further guidance on the implications of the future revocation of the Regional Strategies. This guidance (6 July 2010) states that “Local councils are best placed to assess the needs of travellers. The abolition of Regional Strategies means that local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand, and for bring forward land in DPDs. They should continue to do this in line with current policy.”

3.3 The CLG indicated that further guidance would be made available to assist local authorities in indentifying the appropriate level of need for their respective areas.

4.0 The Gypsy and Traveller PPS: Consultation.

4.1 The draft Planning Policy Statement (PPS) was released for consultation on 13 April 2011, this follows the statement by the Secretary of State in August 2010 which indicated that the government would seek to revoke what it regarded as ‘flawed guidance’ on travellers and replace with ‘light touch guidance’.

4.2 The policy statement proposes that local planning authorities are given the power to set their own targets for pitch/plot provision based on robust evidence of local need in
light of historical demand. The policy does not consider that it is necessary to prescribe the type and volume of evidence required.

4.3 The draft PPS has been prepared in advance of any other part of new National Policy Framework, which is scheduled to be consulted on this year and completed by April 2012.

4.4 The consultation PPS on Planning for Traveller Sites states that in assembling the evidence base necessary to support their planning approach, local planning authorities should:
- pay particular attention to early and effective community engagement with both settled and traveller communities
- co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up to date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan in the light of historical demand
- use a robust evidence base to establish need to inform the preparation of the development plan and make planning decisions.

4.5 The Government has also announced other measures as part of a package to ensure “fair treatment” of those in traveller and settled communities including:
- allowing for traveller sites in the New Homes Bonus scheme, to incentivise local planning authorities to provide appropriate sites
- resuming traveller site provision grant funding from April 2011
- setting up a cross-Government, minister-level working group to address discrimination and poor social outcomes experienced by traveller communities.

4.6 The current circulars refer to GTAAs as required to form an evidence base of need for traveller sites. Although GTAAs are still required under the Housing Act 2004), the draft PPS provides more flexibility in identifying what evidence is required to establish what is the local need for traveller sites.

5.0 Determining the Need

5.1 Guidance from the CLG (6 July 2010) indicates that Wiltshire Council should continue to progress with the Wiltshire Gypsy and Traveller Site Allocations DPD and there are current, unresolved issues in Wiltshire surrounding unauthorised encampments and the lack of alternative sites which need to be addressed.

5.2 Two key decisions need to be made before the work on providing accommodation for Wiltshire’s Gypsy and Traveller community can be taken forward.

a With the imminent removal of Circular advice on how to prepare policies for Gypsies and Travellers should the council continue to prepare a separate DPD to provide the criteria for location of new sites and to allocate new sites or should this work become part of the wider core strategy development?

b How should Wiltshire Council determine the right level of local need for new Gypsy and Traveller and Travelling Showpeople sites?

5.3 Some options on how to respond to question (b) are provided below (with more background provided at Appendix 3). Notes on how other authorities are responding
to the absence of national and regional guidance is attached at Appendix 4 for information.

**Option 1a: Use GTAA data, plan period 2006-2011**

5.4 The methodology and conclusions drawn through the GTAA were accepted by Wiltshire County Council and the former Districts. This could be used as the position pending new advice from the government on how to calculate the need for additional traveller sites in the longer term. This approach would effectively declare that the Northern Area and to a lesser extent the Western Area is now closed to any new Traveller sites up until April 2011 and could be taken forward either through a separate DPD or within the core strategy.

Outcome: Need effectively met in North and West Wiltshire. 
No sites to be identified in East Wiltshire. 
Land for 9 pitches in South Wiltshire 
No new transit sites 
No plan for Travelling Showpeople

Risk: Open to criticism as per EiP discussions 
Open to criticism as per Issues consultation 
Only plans to 2011 
Underestimating need leads to more unauthorised encampments 
Lack of new transit provision could lead to more unauthorised encampments. 
Potential loss of goodwill from resident Travelling community

**Option 1b: Use GTAA data, plan period 2006 - 2016**

5.5 A variation would be to use the GTAA data as the base line but use the projected population growth anticipated in the GTAA (3.8%) as the basis to calculate an annualised rate of development for the next 5 years while additional research takes place. This would result in overall figures set out below.

<table>
<thead>
<tr>
<th>District/Area</th>
<th>GTAA (2006 -11)</th>
<th>Annualised growth 2011-16</th>
<th>Provided 06-10</th>
<th>To be identified</th>
</tr>
</thead>
<tbody>
<tr>
<td>North (NWilts)</td>
<td>24</td>
<td>5</td>
<td>28</td>
<td>2</td>
</tr>
<tr>
<td>South (Salisbury)</td>
<td>9</td>
<td>2</td>
<td>0</td>
<td>11</td>
</tr>
<tr>
<td>East (Kennet)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>West (WWilts)</td>
<td>7</td>
<td>1</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

5.6 This approach would address the problem that the plan period will end before the plan is adopted but would still be open to many of the other criticisms associated with Option 1a.

**Option 2: Continue with RSS figures, plan period 2006-2011**

5.7 The figures in the RSS reflected concerns about the Wiltshire GTAA underestimating the level of need in Wiltshire and evidence presented at the Examination in Public.

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5 Northern area need = 24, permanent provision since 2006 = 28; Western area need = 7, permanent provision since 2006 = 5
Using the RSS figures was challenged during the initial consultation on the Gypsy and Traveller Site Allocations DPD largely because the increased figures compared to the GTAA were not justified and the data to support the figures was not available to scrutinise. However, if it is accepted that the draft figures in the RSS were a legitimate response to the flaws identified in the Wiltshire GTAA, the draft RSS figures could be used as the position pending new advice promised from the government on how to calculate the need for additional traveller sites in the longer term.

5.8 It is possible that a review of temporary sites and sites submitted as part of the consultation could meet this outstanding need for permanent sites without identifying additional land.\(^6\) (New sites would be needed for Travelling Showpeople and transit pitches.) This approach could be taken forward either through a separate DPD or within the core strategy.

Outcome:
- New sites would be needed in all sub areas
- New transit sites would be needed which should help respond to unauthorised sites.
- Includes provision for Travelling Showpeople.
- Continued goodwill with resident Gypsy and Travellers

Risks:
- Open to criticism as not based on local data
- Only plans to 2011

**Option 2b: Use RSS data, plan period 2006 - 2016**

5.9 This option used the figures identified through the RSS EiP process which in turn take into reflect concerns with the Wiltshire GTAA understanding of need in across the county. Applying an annualised growth rate of 3.8% to the residual RSS requirement will enable the planning authority to take into account delivery since 2006 and identify existing demand, on the basis of the residual requirement, and project future demand by applying a recognised annual growth rate.

5.10 This will also ensure that the starting point for the assessment of need is based a sound evidence based as it has been subject to independent public examination through the RSS process and is recognised as a legitimate response to the short-comings of the Wiltshire GTAA.

Outcome:
- New sites would be needed in all sub areas
- New transit sites would be needed which should help respond to unauthorised sites.
- Includes provision for Travelling Showpeople.
- Existing and future demand identified (up to 2016)
- Continued goodwill with resident Gypsy and Travellers

Risks:
- Open to criticism as not based on local data
- Current distribution of sites across the sub-area will be maintained.

**Option 3: Use formulae approach in CLG Guidance\(^7\)**

5.11 The main benefit of using this approach is that need would be estimated from the latest caravan count data for the period 2010 – 2015 (latest caravan count July 2010)

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\(^6\) See Appendix 2 for details of temporary sites in Wiltshire and sites submitted through the consultation exercise

\(^7\) Preparing RSS Reviews on Gypsies and Travellers by Regional Planning Bodies, CLG, May 2007
producing a target based on local information. The main disadvantage to this approach is the formula is based on ‘average’ findings (from the South East) which may not be appropriate in Wiltshire and uses a very general approach intended to be applied by regional bodies. It has been estimated that the level of need based on the July 2010 caravan count would be in the region of 85. This approach could be taken forward either through a separate DPD or within the core strategy.

Outcome: Plans for a longer period to 2015
New permanent sites would be needed throughout the county
No new transit sites
No plan for Travelling Showpeople
Based on local data

Risk: Open to criticism as a rough estimate
Lack of new transit provision could lead to more unauthorised encampments.
Higher level of provision could lead to more confrontation with the settled community

Option 4: Recalculate local need

5.12 The fourth option is to undertake new research to calculate local need for Gypsy and Traveller sites that responds to the criticisms of the previous GTAA. The Wiltshire GTAA has already come to the end of its period (Apr 2006-Apr 2011). However, although the previous government’s advice on how to prepare a Gypsy and Traveller Accommodation Assessment is still in place it would be unwise to commission such research when new advice is imminent. This approach would mean taking a criteria based policy for the location of new sites through the core strategy process to be followed by a separate DPD for specific site allocations.

Outcome: Up-to-date longer term assessment of need based on local information
Need not based on former District areas
Comprehensive assessment (Gypsies, Travellers and Travelling Showpeople)

Risks: Delay
Potential loss of goodwill from resident Travelling community
Short term lack of sites
Potential for further temporary permissions
Implications for current contract with consultants

6.0 Conclusion on the way forward

6.1 It is clear that policies should be the mechanism by which identified need is delivered, through a plan-led and holistic approach to ensure the most suitable and sustainable locations are identified.

6.2 Options 1a and 2 provide a way to continue with policy development using figures to 2011. It will mean that the pitch requirements will need to be reviewed immediately once the plan is adopted. Option 1b by including a rolling natural increase for the period beyond 2011 would extend the life of the plan.

6.3 Option 3 provides a way to proceed with the preparation of a DPD using figures that are derived from local statistics using a standard formula which will allow the plan to
have a longer ‘shelf life’. The significant risk is that they are figures based on a formula not locally distinctive.

6.4 Option 4 provides a longer term plan based on latest government advice but it will introduce delay and uncertainty in the way planning applications are considered in the short term. A situation that has been ongoing for some time resulting in a number of temporary permissions.

6.5 Through the consultation PPS on Gypsies and Travellers it is clear that the government does not intend to prescribe a set methodology for the identification of need within local planning authority areas. Rather the emphasis is on local planning authorities to undertake research and provide evidence that is robust and credible to determine current and future need.

6.6 Core Policy 31 of the Core Strategy implements Option 2b by applying an annualised growth rate of 3.8% to the residual Draft RSS requirement. This ensures that need is identified up until 2016, during which time the Gypsy and Traveller DPD will be progressed to help inform the future strategic planning framework for Gypsy and Traveller accommodation need. This is show in the following table

Table 5: 3.8% Annualised growth applied to residual RSS requirement

<table>
<thead>
<tr>
<th>Area</th>
<th>RSS 2006-2011 requirement</th>
<th>Residual (minus delivery since 2006)*</th>
<th>3.8 annualised growth for 5 years on residual requirement (no. of additional pitches)</th>
<th>Total requirement 2006-2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wiltshire</td>
<td>48</td>
<td>9</td>
<td>3</td>
<td>51</td>
</tr>
<tr>
<td>Salisbury</td>
<td>18</td>
<td>18</td>
<td>3</td>
<td>21</td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>14</td>
<td>8</td>
<td>1</td>
<td>15</td>
</tr>
<tr>
<td>Kennet</td>
<td>5</td>
<td>0</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Total</td>
<td>85</td>
<td>35</td>
<td>8</td>
<td>93</td>
</tr>
</tbody>
</table>

*Based on completion figures available at April 2011

7.0 Gypsy and Traveller DPD

7.1 The purpose of the Gypsy and Travellers DPD is as follows:

- To ensure the identified needs of Gypsies, Travellers and Travelling Showpeople who permanently reside in Wiltshire are met through the allocation of suitable and sustainable new sites;

- To assist the Council in reducing the occurrence of unauthorised Gypsy and Traveller encampments and associated nuisance through the provision of adequate authorised transit and permanent sites;

- To identify a range of site options across Wiltshire where Gypsy and Traveller sites would be appropriate;

- To articulate a process to be used to assess the suitability of private sites submitted to the Council for consideration in the form of a planning application.
To facilitate the integration of the Gypsy and Traveller community with the settled community, addressing racial discrimination and tension that may exists between the travelling and settled community.

7.2 Wiltshire Council commissioned CDN Planning (Wales) Ltd in 2009 to work alongside the Council to help prepare the Gypsy and Traveller DPD. Their work would include the development of planning policies and site search criteria for the allocation of specific sites as well as assessing suitable sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople communities within Wiltshire.

8.0 DPD Consultation responses (Issues and General Approach Report)

8.1 Wiltshire Council recently consulted on the first stage in the preparation of the DPD. This public consultation document entitled Issues and General Approach Report ran from 6 April until 4 June 2010. The purpose of the consultation was to:

- discuss the issues around providing new sites in Wiltshire
- develop a methodology for assessing what makes a good location for new sites based on a clear site selection methodology
- invite land to be put forward to be considered as possible new sites for the Travelling communities.

8.3 The Issues and General Approach Report did not consider any specific sites nor did it assess the suitability of any potential future sites. Rather the consultation focused on raising awareness of the issues and discussing the appropriate site selection criteria to inform future allocations and assist in the determination of planning applications.

8.4 A summary of the consultation process is attached at Appendix 1. In all the Council received letters of comment from 79 different organisations and individuals. Of these 21% were from parish/town councils, 30% from organisations such as the Trust for Devizes and the Coal Authority and 39% from individuals. There was also 3 drop in consultation events where comments were recorded (Devizes, Salisbury and Chippenham) and 8 known permanent private sites were visited by staff to talk to the Gypsy and Traveller community about their thoughts on current provision and good locations for Gypsy and Traveller sites.

8.5 Issues that were raised on several occasions both at consultation events and in written responses:

- A number of respondents challenged the Circular definition of Gypsy and Traveller included in the report as it seemed to exclude new travellers and boaters which were specific types of traveller in Wiltshire that should be recognised.
- There was a lack of confidence in the amount of new accommodation being provided especially as they were taken from the draft RSS which was likely to be revoked.
- There were questions about providing access to employment and the need to provide for business uses within new sites.
- There was a real sense from many respondents that Gypsy and Travellers should be treated in the same was as everyone else when looking for a home.
There was a difference of opinion not necessarily in relation to the need for sites to have access to facilities but in relation to acceptable distances to facilities eg should not be constrained by walking distances.

There was support for the approach taken and criteria within the methodology from key agencies, for example, Environment Agency and Highways Agency.

There were concerns about how new sites would impact on local communities and the local environment with comments suggesting that small (<5 pitches), private, family run sites would have less impact on the local area and encourage integration.

Appendix 1 – Brief summary of comments received during consultation

Qu1: Have the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities been correctly identified? (27 comments received)

Related issues included:
- A sites access to the road network.
- A sites access to employment.
- On site requirements, such as fire access.
- Not making exceptions to normal planning policy for Gypsy or Travelling Showpeople sites.
- Not agreeing with the definition of Gypsies and Travellers in Circular 01/2006.
- Confusion about how need translates into new sites.
- Settled Gypsies should live in housing.

Specific omissions identified from the calculation of accommodation of need:
- Calculations exclude new travellers.
- Haven’t considered boaters.
- The need for Travelling Showpeople should increase to 10 plots.
- The data does not include the period beyond 2011.

Comments on the clarity of data
- The lack of information on the base population.
- Data is not robust and available for scrutiny.
- The large number of unauthorised caravans identified in the July 2009 caravan count indicates need is higher.
- Provide a better understanding of the types of sites (authorised, unauthorised development, unauthorised encampments).

Comments on process
- Shouldn’t accept RSS figures.
- GTAA failed to accurately identify need.

Qu2: Have the right issues been identified in Section 6 of the report and are there issues that have not been identified? (29 comments received)

AONB & Green Belt
- Risk to the objectives of the AONB should be considered.
- Recognise the sensitive landscape of the AONB.
- Sites should only be ruled out if compromises the objectives of the AONB designation.
Green belts should be excluded from consideration

Site location
- Access should be considered in general terms.
- Consider access to employment.
- Can existing sites be extended?
- Deliverability of a site should be a major factor.
- Showmen sites have different requirements and are best located by an extension to an existing yard.
- No of sites in a given parish or surrounding parishes should be considered, especially where there may have been historical animosity.
- Village and rural locations should score positively as these locations reflect the stated preferences in the GTAA.
- Sites within of close to a built up area should be considered prior to isolated rural sites.
- Concerned about impact on farming businesses eg loss of agricultural land.
- Agree sites should not be located in areas liable to flood.
- Should not promote sites adjacent to the railway.
- Access to public transport should be an essential criterion.

On site facilities
- Providing space for businesses on site can lead to un-neighbourliness, noise and pollution.
- Need to build in criteria related to changing needs and potential over crowding.
- Appropriate waste facilities should be available at all sites.
- Domestic sprinklers should be fitted to domestic buildings.
- Support on site facilities to promote self containment, including business/employment uses.

Site size
- Family sites of less that 10 plots can be acceptable.
- Concerned about impact of a large site on a village or rural area.
- Should consider impact of a site on surrounding area.
- Different site size thresholds should apply to showmen sites.

Social issues
- Gypsies and Travellers should focus on self-management to improve relations and site appearance.
- Concerned about impact on local schools and GPs that are already over stretched and may not have capacity.
- Concerned about additional cost for local schools and GPs.
- Need to acknowledge the Gypsy community are facing similar issues as the general population in terms of an increasing elderly population which will bring certain demands.
- Providing separate sites perpetuates social exclusion.

Other
- Previous permissions should be considered.
- Same rules should apply as for everyone else (raised in several comments).
- Sites cannot be treated the same ad general housing because of additional on site requirements and effect on space.
- Council should not pay for on site facilities.
• Consider animal welfare eg space for grazing horses.
• Cost effectiveness of a site should be considered.
• Should not continue with consultation because of promised revocation of RSS.
• Once agreed principles should be strictly applied.
• When considering new sites make sure local residents are well informed.

Qu3: Do you agree with this proposed site selection methodology? (26 comments received)

Very few respondents answered yes or no to this question. Most cited examples of the methodology they supported or would like changing.

Only comments additional to those already submitted in relation to Qu2, above, are listed.

Tier 1 – Location and constraints
• Methodology shouldn’t be so reliant on walking and cycling distances. Circular 1/06 establishes sites are acceptable in rural locations.
• Sites next to waste treatment works should not be considered.
• Sites of less than 5 pitches should be encouraged to aid integration.
• Sites need to be close to facilities.
• Use a sequential approach to flood risk.
• Some criteria are too demanding eg proximity to schools.
• Should state a preference for a village or rural location.

Tier 2 – Access and infrastructure
• Pay more attention to the needs of elderly or disabled Gypsy and Travellers.
• Access to employment should be given greater weight.
• Capacity of and proximity to existing sewerage system needs to be considered.
• Support from Environment Agency re approach to water infrastructure and flood risk.
• Extension or intensification of existing sites is not a good idea.
• Sites should be located on suitable roads.
• Should reflect advice in PPS1 and PPG13 in relation to sustainable transport and design principles.
• Highways Agency supports the approach to transport and sustainable transport in the methodology.

Tier 3 – Impact, design and deliverability
• Need to consider impact on existing local communities more.
• Circular 4/07 highlights that a site for Travelling Showpeople may be appropriate in rural areas.
• Should include more about impact on surrounding area.
• Need to clarify how impact assessments in relation to amenity, landscape and biodiversity will be carried out.
Other

- Need better demographic information on the Gypsy and Traveller community in Wiltshire eg Roma, Irish Travellers, new travellers.
- Will each tier be given equal weight?
- Policy should only address transit needs and Travelling Showpeople’s needs as these different site requirements from normal residential. Permanent sites should be treated like all residential sites.
- It should not be necessary to meet all criteria as LPA needs to be realistic about sites in rural areas (Circular 1/06).

Qu4: Are you aware of any sites/land that might be suitable for gypsy and traveller pitches and/or plots for Travelling Showpeople?

Qu5: Any other comments? (71 comments)

This question raised a range of comments – some issues only raised once others by several respondents. The most common responses were:

- Statements that everyone should be treated equally (14)
- A view that sites should be distributed more evenly across the county (8)
- Concerns about the impact on existing local communities (6)
- Document should be reviewed in light of government proposals (5)
- Concerns about the impact on the local environment (4)
- Concerns relating to perception of the travelling community (4)
- Small sites promote better integration (3)
- Sites within or on the edge of places with facilities should be preferred (3)

Other common themes expressed in different ways were: the need for the council to be stronger in relation to enforcement; challenges to how you define a ‘traveller’; concerns about how temporary and existing unauthorised encampments will be dealt with through the DPD process, the need to consider cross boundary sites and references back to the previous consultation by North Wiltshire.

Two interesting points suggested that brownfield sites should be considered in reference to Greenfield sites and that major housing land releases in the core strategy should include a requirement for new Gypsy and Traveller sites to be provided in the same way affordable housing is provided.

The Council have been asked to consider new travellers and people who live on barges in the definition of ‘traveller’ and to consider protecting existing Travelling Showpeople sites from other forms of development.

Place specific comments were:

- Consider granting a new lease at Bonnie Park
- Consider Keevil Airfield
- Do not consider Lyneham
- A new site for 10 Travelling Showpeople is needed near Swindon
• Several parish councils noted they were not aware of any available land in their parish.

Other comments related to the process of consultation and the next stages of DPD preparation:
• How will comments be treated?
• Consultation at the next stage should take place within the communities where new sites are being considered.
• CPRE (Southern Branch) and Age Concern (Salisbury) should be informed of future consultations
• Don’t lose momentum for the project
• Have an event in Trowbridge
This document was published by the Spatial Plans team, Wiltshire Council, Economy and Enterprise.

For further information please visit the following website:

http://consult.wiltshire.gov.uk/portal