

**Gypsies and Travellers Site Allocations Development Plan Document
Sustainability Appraisal Scoping Report Addendum (July 2011)**

Consultation Response

RESPONDENT	COMMENT	COUNCIL RESPONSE	CHANGE
General Comments			
Wiltshire Council	1. On pages 3 and 4, reference is made to SA guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005). This guidance has been superseded by SA guidance on the PAS website, see http://www.pas.gov.uk/pas/core/page.do?pageId=152450 .	Comment noted.	The PAS guidance will be taken into account in preparing the Sustainability Appraisal.
Bristol City Council	Paragraph 1.2.3 states that transit sites will be addressed at a later date; however, it is unclear how and when provision will be made for transit pitches in the LDF. It is noted that the West of England Gypsy & Traveller Accommodation Assessment (GTAA) recommended provision of 20 transit pitches for Bath & North East Somerset Council for the period to 2011. How and when provision will be made for the needs of Travelling Showpeople in the LDF is also unclear. However, it is noted that the GTAA only recommends provision of 1 plot for Bath & North East Somerset Council.	Transit site provision will now be addressed in the DPD. Travelling Showpeople provision will not be addressed due to the absence of certainty given in the GTAA as to need at B&NES.	Transit site provision will be taken into account by the DPD and in preparing the Sustainability Appraisal.
English Heritage	Having considered the paperwork dated 15 July we have no comments to make on the report other than to signpost the SEA guidance prepared by EH which may be of use to you: http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1282546568	Comments noted.	
Question 1. Are there any other policies, plans or programmes relevant to the Gypsies and Travellers Site Allocations DPD that should be reviewed?			
Natural England	We consider that both PPS9 and the Natural Environment and Rural Communities Act 2006 (the NERC Act) are relevant to the Gypsies and Travellers Site Allocations DPD and should be reviewed. PPS9 states that development plan policies and planning decisions should be	PPS9 and the NERC Act have already been reviewed in Appendix A of the Core Strategy and Site Allocations DPDs SA	No change.

	<p>based on up to date information about the environmental characteristics of the area. The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests.</p> <p>Section 40 NERC Act places a duty on public bodies, in exercising their functions, to have regard to the purpose of conserving biodiversity.</p>	<p>Scoping Report 2007 to which the Gypsies and Travellers Site Allocations DPD SA Scoping Report forms an Addendum (para 1.5.3).</p>	
<p>Friends, Families and Travellers and Traveller Law Reform Project</p>	<p>This should include reference to the SW RSS Partial Review Panel report for Gypsy and Traveller accommodation which continues to form part of the evidence base for all planning considerations for Gypsy and Traveller sites in the SW even though the current government policy is abolition of the regional planning framework.</p> <p>It should contain reference to Circular 1/2006 which remains in force at the time of writing (references to RSS excluded). It continues to form the national policy framework for planning for Gypsy and Traveller sites until superseded.</p>	<p>Comment noted.</p> <p>Circular 1/2006 has already been reviewed in Appendix A of the Core Strategy and Site Allocations DPDs SA Scoping Report 2007 to which the Gypsies and Travellers Site Allocations DPD SA Scoping Report forms an Addendum (para 1.5.3).</p>	<p>The SW RSS Partial Review was directly informed by the West of England GTAA. Reference to this document is no longer relevant.</p>
<p>Wiltshire Council</p>	<ol style="list-style-type: none"> 1. ODPM Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites 2. DCLG Circular 04/07: Planning for travelling showpeople 3. Sustainable Communities: Homes for all (ODPM, 2005) 	<p>All three documents already been reviewed in Appendix A of the Core Strategy and Site Allocations DPDs SA Scoping Report 2007 to which the Gypsies and Travellers Site Allocations DPD SA Scoping Report forms an Addendum (para 1.5.3).</p>	
<p>Environment Agency</p>	<p>The Local Planning Authority should be aware that Planning Policy Statement 25 (PPS25) has been updated since the publication of the previous scoping report. This is currently not included in the list of updated Policies, Plans and</p>	<p>Comments noted.</p>	<p>PPS25 and its accompanying guidance will be taken into account in forming the final Sustainability</p>

	Programmes on p.6 of the Addendum that require further review. PPS25 was revised in March 2010. Changes included some alterations to the flood risk vulnerability classifications (Table D.2) and a clarified definition of functional floodplain. The revisions in PPS25 are therefore relevant to Gypsies and Travellers sites given their flood risk vulnerability classification. The LPA should also be aware that the accompanying PPS25 Practice Guide was also updated in December 2009.		Appraisal Addendum and the methodology for site selection for the DPD.
Bristol City Council	Reference to Circular 01/2006 "Planning for Gypsy and Traveller Caravan Sites" could be included in the list of national policies, plans and programmes. However, it is acknowledged that the coalition Government intends to replace this with new light touch guidance.	Circular 1/2006 has already been reviewed in Appendix A of the Core Strategy and Site Allocations DPDs SA Scoping Report 2007 to which the Gypsy and Traveller Site Allocations DPD SA Scoping Report forms an Addendum (para 1.5.3).	
Somerset County Council	Not aware of any.	Comments noted.	
Question 2. Is the baseline data appropriate to the Gypsies and Travellers Site Allocations DPD?			
Friends, Families and Travellers and Traveller Law Reform Project	The baseline data seems to cover the issues. There is a clear need arising from both caravans on land owned by Gypsies and Travellers and from unauthorised camping. There is a clear need for updating of the GTAA in due course. As the GTAA is rapidly becoming out of date then a new GTAA will need to be commenced shortly. However this should not be seen as a reason to delay making provision.	Comments noted.	
Wiltshire Council	Yes.	Comments noted.	
Environment Agency	We are happy with the baseline data outlined. We would suggest however that the Strategic Flood Risk Assessment (SFRA) Level 1 and 2 may be better reviewed as baseline data, rather than being a relevant Plan, Policy and	Comments noted.	The SFRA will be incorporated into the baseline data within the Sustainability Appraisal and final site

	Programme where it is currently listed in the Scoping Report Addendum. This is because, similar the Gypsy and Traveller Accommodation Needs Assessment (GTAA), the SFRA is more a key evidence base document to inform the LDF process, rather than a policy document in its own right.		selection methodology of the DPD.
Bristol City Council	Yes the baseline data from the GTAA and bi-annual caravan count is considered appropriate. Please note that the table in Appendix C entitled "Baseline Information" contains an error in respect of the GTAA transit requirement for Bristol for the period to 2011. The transit pitch requirement should read 0 (see footnote 30 at the end of the table 47 in the GTAA which states that "Bristol City Council requires a local transit capacity of 20 caravans/pitches but already has a site with this capacity").	Comments noted. Appendix C will be amended to correctly refer to the need for no further transit sites for Bristol.	Amend Appendix C to correctly refer to the need for no further transit sites for Bristol.
Somerset County Council	Yes	Comments noted.	
Question 3. Is there any other relevant baseline data that should be included?			
Friends, Families and Travellers and Traveller Law Reform Project	There should be information held on Gypsies and Travellers by housing bodies which will help to inform needs arising from Gypsies and Travellers in housing with a need for a site. The Traveller education service should also hold data on Gypsy and Traveller children and families which should be included as baseline information. The Police may hold information on unauthorised camping which should be included with the bi-annual caravan count as baseline information. Planning application and appeals information should also be included as a source of baseline information.	Comments noted. The GTAA included information from housing and education bodies. Further information presented by consultees will be taken into account in forming site selection criteria and the final DPD.	
Wiltshire Council	1. Has the Gypsy and Traveller community been consulted to find out what their needs are? Any such information from that consultation could be included in the baseline section. 2. What are the historical reasons for there being no authorised sites in the	The GTAA was largely informed by face-to-face interviews with the Gypsy and Traveller community in the area. This information does not fall	

	district, despite demand for sites? Have sites been proposed but rejected in the past, and if so, why? Has there been local opposition to proposed sites in the past?	within the scope of the Sustainability Appraisal.	
Environment Agency	We are happy with the baseline data outlined. We would suggest however that the Strategic Flood Risk Assessment (SFRA) Level 1 and 2 may be better reviewed as baseline data, rather than being a relevant Plan, Policy and Programme where it is currently listed in the Scoping Report Addendum. This is because, similar the Gypsy and Traveller Accommodation Needs Assessment (GTAA), the SFRA is more a key evidence base document to inform the LDF process, rather than a policy document in its own right.	Comments noted.	The SFRA will be incorporated into the baseline data within the Sustainability Appraisal and final site selection methodology of the DPD.
Bristol City Council	We are not aware of any other relevant baseline data that should be included.	Comments noted.	
Somerset County Council	No.	Comments noted.	
Question 4 Have the key sustainability issues been identified?			
Natural England	We are pleased to see that the first of the additional sustainability issues identified for the Gypsies and Travellers Site Allocations DPD concerns areas of nature and conservation importance. We note that the key considerations concern, "sites in areas with <i>nationally</i> recognised designations" and suggest that the key considerations should also include sites with locally recognised designations (such as SNCIs and Local Nature Reserves) as the features of these sites may also be compromised by the allocation of a site for Gypsies and Travellers.	Sites in areas with locally recognised designations will be added as an additional sustainability issue to table 3.	Yes
Friends, Families and Travellers and Traveller Law Reform Project	These have generally been covered by reference to 1/1006. We do have some concerns that the general environmental considerations do not balance planning constraints against the difficulties that Gypsies and Travellers have in finding suitable and affordable land. This is highlighted in Circular 1/2006 and should be referenced. Many local authorities and planning inspectors have recognised that if suitable sites cannot be found in the urban area or adjoining	The site selection methodology for the DPD will include a balancing exercise incorporating these constraints. This methodology will be considered in forming the final Sustainability	

	unconstrained countryside that the would be the very necessary circumstances to allocate sites in constrained areas e.g. Green Belt. This should be reflected in sustainability issues.	Appraisal.	
Wiltshire Council	<p>A large number of key sustainability issues have been identified, but only a small number relate to specific issues in BANES. Many of the issues are sourced from national level documents and there is no link between these identified issues and the baseline discussion.</p> <p>SA guidance states that any issues identified need, where possible, to be linked to evidence by reference to baseline information and the identification of historical or likely future trends.</p> <p>From the baseline section, the key issues that come out of this are that there are no authorised sites in the district but a number of unauthorised sites exist. There is a demand for sites that is not currently being met. None of the other identified issues are discussed in the baseline section.</p> <p>There should be a link between the baseline discussion and identified key issues, At present, the key issues section is significantly larger than the baseline section - there should be a better discussion of the relevance of these issues within the district, or discussion of information gaps that exist locally and how these could be filled.</p>	Comments noted.	The sustainability issues and objectives will be redrafted to relate more specifically to Gypsy and Traveller communities.
Environment Agency	We are happy that the key sustainability issues have been identified, given the guidance outlined in Circular 01/2006. Circular 01/2006 describes how sites should not be located in areas at high risk of flooding, including the functional floodplain, given the particular vulnerability of caravans. With this in mind it will therefore be of key importance that the LPA use our flood zones and the SFRA to spatially assess potential allocations and ensure they are located outside of Flood Zone 3a and 3b.	Comments noted.	The SFRA will be taken into account in defining the site selection methodology in the DPD and the Sustainability Appraisal.
Bristol City Council	The additional sustainability issues identified in table 3 appear very comprehensive.	Comments noted.	
Somerset County Council	Yes.	Comments noted.	

Question 5. Do you have any comments on the Sustainability Appraisal objectives?			
Friends, Families and Travellers and Traveller Law Reform Project	No comment	Comment noted.	
Natural England	We are pleased to see that the first of the additional sustainability issues identified for the Gypsies and Travellers Site Allocations DPD concerns areas of nature and conservation importance. We note that the key considerations concern, “sites in areas with <i>nationally</i> recognised designations” and suggest that the key considerations should also include sites with locally recognised designations (such as SNCIs and Local Nature Reserves) as the features of these sites may also be compromised by the allocation of a site for Gypsies and Travellers.	Comments noted.	
Wiltshire Council	<p>You have made a decision not to amend or add to the SA objectives and most do relate to the DPD in some way. However, it is felt that the SA objectives are very general in nature, which is fine when considering a Core Strategy document, but they could be refined to make them more relevant to the Gypsy and Traveller community. Either that or amend the detailed questions to make them more relevant.</p> <p>For example, the detailed questions for SA objective 3 could include something about providing authorised sites to meet demand. Detailed questions for SA objective 2 could refer to the specific health issues experienced by the Gypsy and Traveller community, as per key issues section. Same goes for SA objective 6 which could be made more relevant to the particular educational issues associated with the Gypsy and Traveller community.</p> <p>It is questioned how relevant SA objectives 8, 9, 16, 19 are to this DPD unless made more relevant to Gypsy and Traveller issues.</p>	Comments noted.	The questions will be amended to relay more precisely how they relate to the needs of travelling communities.
Environment	Overall we are satisfied with the SA objectives outlined. Given national flood	Comments noted.	The Sustainability Appraisal will

Agency	risk policy in relation to residential caravans (Circular 01/2006 and PPS25), the LPA may wish to consider strengthening Objective 18 to give more of an emphasis on avoidance of flood risk rather than mitigation. Even if a site could mitigate flood risk it would still not be acceptable in Flood Zone 3a or 3b given the vulnerability classification.		balance the higher risks of flooding associated with pitch and yard location.
Bristol City Council	<p>Consideration should be given to using objectives that specifically relate to Gypsy & Traveller issues rather than using the sustainability objectives used in the Scoping report for the Core Strategy and Site Allocations DPD.</p> <p>Alternatively relevant questions associated with objectives could be tailored to relate to issues of relevance to the Gypsy & Traveller DPD (e.g. the first detailed question associated with objective 3 could be tailored so that it relates specifically to the accommodation needs of Gypsies & Travellers. The requirement from the GTAA for the Bath & North East Somerset Council (which is referred to in section 3.2 “Additional baseline information”) could be included in the sustainability objectives to provide a target, which could be monitored).</p>	Comments noted.	The objectives will be redrafted to more specifically relate to Gypsy and Traveller community issues.
Somerset County Council	No.	Comments noted.	