

# **Cotswold District Local Plan 2011-2031**

## **Local Plan Examination 2017**

### **Topic Paper 3: Gypsy and Traveller Site Allocations**



**COTSWOLD**  
DISTRICT COUNCIL



## Background

The 2004 Housing Act requires local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople (GTS), and to make adequate provision for them through the planning process. Cotswold District Council has worked with the County Council and the other five district councils in Gloucestershire<sup>1</sup> to undertake an assessment of GTS's accommodation needs within the county. Three County-wide GTS assessments have been undertaken over the last 10 years, the most recent having been published in December 2016.

The first report for Gloucestershire was published in 2007<sup>2</sup>. Although the report estimated that 17 residential pitches were required in Cotswold District over the period 2007-2012, no pitches were proposed in the Local Plan until after the second sites assessment had superseded the 2007 report (see GGTTSA below). The first Local Plan document to propose sites for gypsies and travellers' pitches was the Local Plan Reg.18 Consultation: Development Strategy and Site Allocations (January 2015).

## Purpose of the Topic Paper

This Topic Paper explains the rationale behind the gypsy and traveller sites proposed for allocation in the Cotswold District Local Plan 2011-2031 Submission Draft (June 2016).

## Gloucestershire County Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (PBA/ ORS, October 2013) [GGTTSA]

The 2013 [GGTTSA](#) identified the County-wide and local authority requirements for sites between 2013 and 2031. As such, it sought to produce an evidence base to enable the Gloucestershire local authorities to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under:

- the Housing Act 2004
- the National Planning Policy Framework 2012; and
- Planning Policy for Traveller Sites 2012 (PPTS).

The main objective of the study was to provide the Local Authorities with robust, defensible and up-to-date evidence about the accommodation needs of GTS in Gloucestershire up to 2031 in five year periods covering 2013-2017, 2018-2022, 2023-2027 and 2028-2031. It sought to identify whether any extra site provision over these periods should be on public or private sites, and whether or not any of the Local Authorities needed to plan for the provision of transit sites or emergency stopping places. The study also sought to identify broad locations for any future site searches by Local Authorities in Gloucestershire.

The GGTTSA concluded that 44 gypsy and traveller pitches were provided in Cotswold District and that there was a requirement to 2031 for a further 26 pitches, broken down as follows:

- 2013 - 2017: 5 private pitches
- 2018 - 2022: 6 private pitches
- 2023 - 2027: 1 public + 7 private pitches

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<sup>1</sup> Cheltenham Borough Council; Forest of Dean District Council; Gloucester City Council; Stroud District Council; Tewkesbury Borough Council; and Gloucestershire County Council.

<sup>2</sup> Gypsy and Traveller Accommodation Assessment report (Ark Consultancy for the County and District Councils of Gloucestershire, October 2007).

- 2028 - 2031: 1 public + 6 private pitches

No travelling showpeople requirements were identified in Cotswold District.

## **Gypsy and Traveller – Identification of Potential Sites for Cotswold District Council (WS Planning & Architecture, November 2014)**

The purpose of this [study](#) was to identify land where the pitch requirement set out in the GGTTSA could be provided in line with the requirements of the Planning Policy for Travellers' Sites (CLG, March 2012).

The study was undertaken in a number of stages and every potential site was assessed to establish whether it was suitable and available for traveller accommodation, and when it could be delivered. Besides being informed by the findings of the GGTTSA, it took on board comments made by the Traveller community who had been surveyed by ORS regarding site suitability.

As a first step, the County Council undertook a targeted 'call for sites' with landowners, agents and members of the community invited to submit sites for consideration to potentially provide permanent accommodation for travelling communities. This, and subsequent, calls produced very few potential sites for consideration. Following a desktop assessment of all sources of land, sites were considered against criteria set out in the PPTS. Once sites were discounted on grounds that they were unavailable, undevelopable or unsuitable, a shortlist was drawn up for more detailed assessment. The shortlist was taken forward for sustainability appraisal and 'SHLAA' assessment by an advisory panel.

## **Sustainability Appraisal of Gypsy and Traveller Site Allocations (October 2014)**

The following 10 shortlisted sites were assessed through the Sustainability Appraisal [process](#) :

- GT3 – Shorncote, South Cerney (2<sup>nd</sup> site)
- GT4 – Hill View, Icomb
- GT5 – Seven Springs, Coberley (1<sup>st</sup> site)
- GT7 – Old Dairy, Dudgrove Lane, Kempsford
- GT8 - Seven Springs, Coberley (2<sup>nd</sup> site)
- GT9 – Meadowview, Fosse Way, Bourton-on-the-Water
- CC23A, B, C, D and E – Aston Road, Chipping Campden
- SC21 – East of Cirencester Road, South Cerney
- CDC2 – Adjacent to Down Ampney FC, Down Ampney
- CDC6 – Rear of Greens Close, Great Rissington

## **Gypsy and Traveller Site Assessment Advisory Panel (November 2014)**

The [Advisory Panel](#) comprised a range of participants, including representatives for: the Cotswold Conservation Board; the Gypsy and Traveller community; the Environment Agency; the development industry; and WS Planning & Architecture, the authors of the report that identified potential sites. The Panel was supplemented by three District Councillors along with planning and housing officers from CDC. Consideration was given to all of the sites appraised by the Sustainability Appraisal.

The Panel concluded that five of the sites should not be supported: GT4; GT7; CC23A, B, C, D and E; SC21; and CDC2.

The following four sites were supported by the Panel for allocation in the Local Plan: GT3; GT5; GT9; and CDC6. Site GT8 was considered suitable as a reserve site.

## **Cotswold District Local Plan Reg.18 Consultation: Development Strategy and Site Allocations (January 2015)**

In accordance with the conclusions of the Gypsy and Traveller Site Advisory Panel, the following sites were proposed in section 9 of the [January 2015 Consultation Paper](#) :

- GT3 – Shorncote, near South Cerney – 2 pitches
- GT5 – Seven Springs, Coberley – 1 pitch
- GT9 – Meadowview, Fosse Way, Bourton-on-the-Water – 4 pitches
- CDC6 – Rear of Greens Close, Great Rissington – 2 pitches

The following reserve site was also proposed in the event of any shortfall being identified in the supply of

- GT8 - Seven Springs, Coberley (2<sup>nd</sup> site) – 2 pitches

The allocations prompted a very large number of representations – over 5,500 – the overwhelming majority submitted through a campaign group known as LeckyHill RAID. The campaign was opposed to the two proposed sites at Seven Springs, Coberley. Summaries of all representations received in respect of Section 9, together with officer responses, is included at Appendix A.

## **Planning Policy for Travellers Sites (August 2015)**

This national policy was issued in August 2015 to update the corresponding policy, which was published alongside the NPPF in March 2012. The main changes from the previous PPTS are as follows:

1. Paragraph 9 and Annex 1 introduced a new definition to help determine whether persons are 'gypsies and travellers' for the purposes of planning policy; i.e. (a) whether they previously led a nomadic habit of life; (b) the reasons for ceasing their nomadic habit of life; and (c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.
2. Paragraph 12 states that, in exceptional circumstances, where a LPA is burdened by a large-scale unauthorised site that has significantly increased their need, and the area is subject to strict and special planning constraints, then there is no assumption that the LPA is required to plan to meet their traveller site needs in full.
3. Paragraph 27 states that if an up-to-date 5 year supply of deliverable sites cannot be demonstrated, this should be a significant material planning consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission. The exception is where the proposal is on land designated as (inter alia) an Area of Outstanding Natural Beauty.

## **Cotswold District Local Plan Reg.18 Consultation: Planning Policies (November 2015)**

Policy H4 – Gypsy, Traveller and Travelling Showpeople Sites – was proposed in this consultation document. This policy, however, was for development management purposes rather than proposing gypsy and traveller site allocations. The policy essentially:

1. safeguarded existing authorised sites subject to a need for such use remaining within the District; and
2. put forward a sequential approach towards ensuring a five years' supply of deliverable sites (with the first preference being sites specifically allocated gypsies and travellers in the Local Plan).

Policy H4 also included locational criteria to guide planning applications in the event that need cannot be met at any existing suitable site.

## **Cotswold District Local Plan Submission Draft Reg.19 (June 2016) and Focussed Changes Addendum (December 2016)**

The Submission Draft was published after the PPTS update but long before receipt of the reviewed Gloucestershire Gypsy and Traveller Accommodation Assessment<sup>3</sup>. Given:

- (i) the absence of the latter; and
- (ii) the paucity of potential sites that had come forward through calls for sites;

the Council decided that the sites proposed in January 2015 should be retained to help meet future needs identified at that time. It should be noted that those sites only provided sufficient land to meet needs to 2022.

Summaries of representations received in respect of Section 8.7 and Appendix C, together with officer responses, is included at Appendix B. No Focussed Changes were proposed in response to those representations.

## **Gloucestershire Gypsy and Traveller Accommodation Assessment (March 2017) [GTAA]**

The GTAA took account of the August 2015 PPTS (including the change in definition of 'gypsies and travellers'), and sought to update the Gloucestershire position by surveying members of the travelling community. The survey was only partially successful because many travellers appear to have been reluctant to engage in interviews. Consequently, assumptions had to be made regarding future needs for certain elements of the travelling community.

Although the GTAA wasn't finally 'signed-off' until March 2017, the draft findings were available in December 2016. Hence, the latter were able to inform the Focussed Changes consultation. Essentially, the GTAA identified the following needs for the period 2016-2031 arising from:

- Households that meet the new definition of Travellers: 3 (all in period 2016-2021)
- Households that do not meet the new definition of Travellers: 13 (8 in period 2016-2021)
- Unknowns: 1

As with previous studies, no travelling showpeople households were identified in Cotswold District.

## **Conclusions/ approach taken with Draft Local Plan<sup>4</sup>**

PPTS (paragraph 10) requires LPA's to *"identify and update annually, a supply of specific deliverable gypsy and travellers sites sufficient to provide 5 years' worth of sites against locally-set targets"*. Throughout the plan preparation process, the Council has experienced difficulties in identifying suitable sites that would potentially meet future gypsy and traveller accommodation needs.

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<sup>3</sup> The final draft was available in December 2016 and the final version was dated March 2017.

<sup>4</sup> 'Draft Local Plan' is the Submission Draft Reg.19 version as amended by Focussed Changes and Minor Modifications

The Reg.19 Submission Draft Local Plan had (notionally) allocated more than enough land to meet the modest need of 3 pitches subsequently identified for the newly-defined 'travelling' gypsies and travellers. However, the supply of sites in the Submission Draft was significantly lacking when taking account of the GTAA's identified need of 14 pitches for 'non-travelling' gypsies and travellers (including 'unknowns').

The authors of the GTAA advise that it would be imprudent to ignore the needs of any gypsies and travellers (including non-travelling) because their housing requirements are very different to those of the wider community. The specific needs of all gypsies and travellers will be addressed through a future review of the Strategic Housing Market Assessment.

For the above reasons, the Council has taken the pragmatic decision to not de-allocate any of the gypsy and traveller sites proposed in the Reg.19 Submission Draft.

It is appreciated that many representors have objected to certain sites, notably citing the opinion that the updated PPTS gives added weight to the significance of AONBs. The PPTS, however, does not preclude allocating sites in designated landscapes; indeed, there is a paucity of national guidance on this matter. The only reference to designated landscapes in the PPTS is at paragraph 27, which relates to determining planning applications for traveller sites (Policy H); not the allocation of sites to meet future needs.

The Local Plan examination seems the most appropriate forum for testing the suitability of gypsy and traveller site allocations; whereby the landscape and other concerns, articulated by objectors, can be weighed against the requirement to meet the future needs of the travelling community.

N.B. Two 'new' sites have recently emerged from a subsequent call for sites. If either/both of these sites are assessed as suitable, they will be submitted as supplementary evidence for consideration through the examination process.

## APPENDIX A – SUMMARY OF REPRESENTATIONS ON REG.18 CONSULTATION (JANUARY 2015) AND COUNCIL’S RESPONSES

ISSUES RAISED	RESPONSE/ ACTION
<p>The 2013 GGTTSA is likely to significantly underestimate needs in Cotswold District. It is difficult to reconcile the figures in that document with the figures in the equivalent 2007 assessment, which had been tested through a regional examination.</p>	<p>The RSS and the 2007 GGTTSA were produced under old legislation, which has since been repealed (n.b. the ‘regional examination’ refers to the South West RSS, which was never adopted). In 2013, the six Gloucestershire Authorities produced a joint GTTSA to provide updated evidence for their local plans covering the period to 2031. That evidence was based on up-to-date legislation (p.9 Para 1.10 of the 2013 GGTTSA). The GGTTSA (p70) clarifies that any backlog has been included in the calculation of future need. Any further reassessment of need will be taken into consideration and inform the final site allocations.</p>
<p>Evidence Paper: Advisory Panel on Gypsy and Travellers Site Locations Assessment (November 2014) paragraph 7 raises concerns that the majority of proposed pitch allocations are on the edge of the Cotswold District.</p>	<p>Administrative boundaries are irrelevant in terms of preferred locations for traveller sites. Irrespective of this, and the difficulties of finding new sites, they should, wherever possible, be located where travellers’ needs are generated. The projected requirement of 26 pitches to 2031 (2013 GGTTSA) has been generated by growth from existing sites; i.e. where children grow-up and establish households of their own. In such cases, their usual preference is to locate with their existing family group. For this reason, future expansion of existing sites should provide for these additional pitches, where it is feasible to do so. Many existing travellers’ sites happen to be near the District’s boundary.</p>
<p>Emerging government advice on planning for traveller sites proposes to limit the definition of gypsy and travellers to only those who have a nomadic habit of life. Proposals for permanent sites would, in this circumstance, be treated no differently to an application from the settled population - Gypsy and Traveller sites should not be granted where normal permissions for residential housing for the "settled community" would be refused.</p> <p>Emerging advice is also likely to give added weight to the significance of AONBs.</p>	<p>The suggestion that <i>“Proposals for permanent sites would, in this circumstance, be treated no differently to an application from the settled population”</i> assumes that the Government consultation will remain unchanged when the final version of the reviewed PPTS is published. There is, however, no certainty that this will happen at this time. Travellers’ circumstances are, in any event, very different to those of the settled community. However, the statement <i>“Gypsy and Traveller sites should not be granted where normal permissions for residential housing for the ‘settled community’ would be refused”</i> is taking matters out of context. The intention here is to protect the amenity of Travellers, for example by preventing pitches being allocated in flood zones.</p> <p>The six Gloucestershire LPAs will be reviewing the 2013 GTTSA to reflect updated Government Guidance on Traveller Sites, which is expected later in 2015. There is a risk that an update of the GGTTSA may not be available in time to inform the content of the Reg.19 document. However, it would be prudent for the Council to do everything possible to continue its search for suitable travellers’ sites to meet future requirements. This should include undertaking a refresh of the SHLAA, incorporating reassessments of existing proposed allocations taking account of the latest available evidence and guidance.</p>
<p><b>GT5 and GT8 (Seven Springs)</b></p>	
<ul style="list-style-type: none"> <li>• Unsustainable, remote rural location - considerable distance from shops, schools, doctor surgeries, supermarkets and other day-to-day facilities.</li> </ul>	<p>Local services are within the required 10 minute driving distance will be within the administrative areas of Cheltenham Borough and Tewkesbury Borough Councils.</p>



ISSUES RAISED	RESPONSE/ ACTION
<ul style="list-style-type: none"> <li>7 traveller pitches up to year 2022 is excessive relative to the size of Coberley. Moreover, GT 5 and GT 8 are identified as broad locations for further traveller accommodation. Paragraph 9(d) of the PPTS states that local planning authorities should relate the number of pitches or plots to the size and location of the site and surrounding population's size and density. Paragraph 12 advises that local planning authorities should ensure that the scale of sites do not dominate the nearest settled community</li> </ul>	<p>It is not known how it has been concluded that 7 pitches are proposed. The Reg.18 document proposes 1 pitch at GT5, while GT8 is a reserve site for potentially 2 pitches.</p>
<ul style="list-style-type: none"> <li>The development of these sites will result in the loss of greenfield land, whereas the NPPF seeks to prioritise the use of previously developed land.</li> </ul>	<p>Para 111 of the NPPF does not preclude development on greenfield sites. It states that it "...encourage (s) the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value..."</p> <p>A call for sites exercise was undertaken, followed by a SHLAA. No suitable previously developed sites were identified as available for pitch provision.</p>
<ul style="list-style-type: none"> <li>The proposed allocations will cause significant harm to the Cotswold Area of Outstanding Natural Beauty and public views from the adjacent Cotswold Way. In March 2014 the Council refused permission on the site of GT 8 for stables and hardstanding for reasons including significant adverse impact on the character and appearance of the AONB. Proposed allocation of GT 8 as a reserve site is contrary to appeal decision (ref. APP/F1610/C/12/2190155, APP/F1610/C/13/2191310, and APP/F1610/A/13/2192673): the harm to the AONB was not outweighed by the shortage of traveller sites within the district.</li> </ul>	<p>Planning Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. These planning decisions predated the evidence informing the Reg. 18 consultation document; therefore, the evidence that has become available through the local plan process was not available to inform those earlier decisions. The Local Plan has to provide for future need in appropriate locations and that has to be balanced against environmental considerations (N.B. Only 20% of Cotswold District lies outside the AONB).</p>
<ul style="list-style-type: none"> <li>Charlton Kings is further from Seven Springs than 0.23 miles than others claim. Live and let live.</li> </ul>	<p>Agree. The most southerly – i.e. nearest - part of Charlton Kings (Cheltenham Park Hotel) is about 1.7 miles from Seven Springs.</p>
<ul style="list-style-type: none"> <li>Given: (i) the underestimating of need by the 2013 GGTTSA; and (ii) the site's suitability for a well-designed Gypsy and Traveller site; GT8 should be allocated for Gypsy &amp; Traveller residential use rather than identified as a reserve site. Para 9.3 -oppose use of the phrase "potential over-supply", and would recommend that policy is drafted using words on the lines of: "the district accommodating at least ... pitches by ...."</li> </ul>	<p>Disagree with point (i) – see earlier response re. 2013 GGTTSA. Regarding (ii), there will be a need to assess what goes forward in the Reg. 19 document and this will be informed by reviews of the SHLAA and the 2013 GGTTSA as well as the updated PPTS.</p>
<p><b>Supportive comments:</b></p> <ul style="list-style-type: none"> <li>The idea of bringing together both houses and small, well-planned Gypsy sites in an excellent idea and the way forward for good community relations.</li> <li>Gypsies are entitled to basic human rights and somewhere safe to live must be very close to the top of that list.</li> <li>Charlton Kings is further from Seven Springs than 0.23 miles than others claim. Live and let live.</li> </ul>	<p>SUPPORT WELCOMED</p>

## DUTY TO CO-OPERATE BODIES AND OTHER KEY STAKEHOLDERS

ISSUES RAISED	RESPONSE/ ACTION
<p><b>MoD (Defence Infrastructure Organisation):</b> Site GT3 falls within the 91.4m height consultation zone surrounding RAF Fairford. Therefore, any proposed development exceeding this height should be referred to this office for review. Site CDC6, Great Rissington falls within the 45.7 height consultation zone for both Little Rissington and RAF Brize Norton. Therefore, any proposed development exceeding this height should be referred to this office for review. The remaining sites Andoversford; Blockley; Chipping Camden; Mickleton; Moreton in Marsh; Northleach; Stow on the Wold; Tetbury and Willersey fall outside of statutory safeguarding areas. We therefore have no objections to developments in these areas.</p>	<p>Noted – however, there are unlikely to be any structures anywhere near this height proposed on such sites.</p>
<p><b>Stow-on-the-Wold PC:</b> Any residential site close to Stow is likely to be used as a ‘staging area’ for movement to and from the twice yearly Gypsy Fairs held at Stow on the Wold. Stow is the only place in the district that is subject to considerable exposure to the travelling community in overwhelming numbers on a regular twice yearly basis. Gypsy accommodation with land capable of holding transit caravans poses the potential for various issues; therefore, as a preventative measure, Stow on the Wold Council requests that such sites are not sited within 15 miles of the town.</p>	<p>The sites proposed are for permanent, rather than transit, pitches; therefore, this comment is not applicable to the proposed allocations.</p>
<p><b>Cotswolds Conservation Board:</b> Sites GT5 and GT8 - exclude these allocations. Sites lie within the AONB, therefore NPPF 115 applies. In granting temporary consent on appeal ref: APP/F1610/A/13/2192673, the Inspector concluded: <i>“...Although ... this is not a pristine, high quality part of the AONB, it is still attractive countryside that is only partially marred by the man-made intrusions. In wider views other houses and farm buildings are visible, but these seem to be a natural part of the landscape. By way of contrast the settlement on the site does not. It stands out as alien and intrusive. This may partly be because it is new, but the mobile home and its domestic appurtenances in particular appear brashly out of place as they intrude into the paddock area, away from the stable building. They have a somewhat temporary and ramshackle feel. It would be wrong to add further harmful structures to this part of the AONB that is already suffering from a poorly designed road system. In my view, therefore, the harm caused by the site as it stands, is considerable. It is highly visible, even with screening, and stands out in views across the valley. However, if I consider just the site proposed in appeal D, the harm would be reduced. The majority of views are from the west, and the mobile home would be partially masked by the stables. As long as any garden area does not extend northwards into the paddock, the whole would be contained within the hardstanding area between the stables and the tree screen next to the A435. This much more compact and discrete grouping would still, in some views stand out, but generally would be less visible and have less harmful impact. I am required by the Framework to give great weight to conserving the AONB, and bearing this in mind I find the site does cause significant harm, but the proposed site of appeal D less so.”</i> It was clearly the Inspector’s view that the harm to the landscape</p>	<p>Planning Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. These planning decisions predated the evidence informing the Reg. 18 consultation document; therefore, the evidence that has become available through the local plan process was not available to inform those earlier decisions. The Local Plan has to provide for future need in appropriate locations and that has to be balanced against environmental considerations (N.B. Only 20% of Cotswold District lies outside the AONB).</p>

<p>could not be mitigated over time, hence in part the temporary consent. Hartley Lane forms part of the Cotswold Way National Trail, which attracts in the region of 100,000 walkers per year. Users of the Cotswold Way are very likely to be highly sensitive to landscape change. Thus, the harm caused by the development will be noticed by a considerable number of people seeking to enjoy a landscape nationally designated for its natural beauty. NPPF Paragraph 75 requires the Council to protect and enhance public rights of way, including National Trails.</p>	
<p><b>Wychavon DC:</b> There are no objections in principle to the Gypsy and Traveller Accommodation section, Policy SP8, or to the choice and location of the sites.</p>	<p>Noted.</p>
<p><b>Charlton Kings PC:</b> CKPC notes that plans to use AONB land for a traveller site(s) not far from our parish boundary – sites GT5 and GT8. There does not appear to be special protection for AONB in Cotswold District, although detailed policy will be included in the next stage of the plan. We recently objected to an application to build houses on AONB in our patch. The NPPF states that areas such as AONB are exempt from the presumption in favour of sustainable development (footnote 9 of paragraph 14) and that <i>'great weight should be given to conserving landscape and scenic beauty in AONBs'</i> (paragraph 115). The draft Local Plan makes no provision for future protection of an area which our residents regard as a high amenity; consequently we register our objection.</p>	<p>Administrative boundaries are irrelevant in terms of preferred locations for traveller sites. Irrespective of this, and the difficulties of finding new sites, they should, wherever possible, be located where travellers' needs are generated. The projected requirement of 26 pitches to 2031 (2013 GGTTSA) has been generated by growth from existing sites; i.e. where children grow-up and establish households of their own. In such cases, their usual preference is to locate with their existing family group. For this reason, future expansion of existing sites should provide for these additional pitches, where it is feasible to do so. Many existing travellers' sites happen to be near the District's boundary. Regarding footnote 9 of the NPPF, paragraph 14 does not use the word 'exempt' – it states that "<i>Local Plans should meet OANs, with sufficient flexibility to adapt to rapid change, unless... specific policies in this Framework indicate development <b>should be restricted</b></i>". The Local Plan has to provide for future need for gypsy and traveller accommodation in appropriate locations - and that has to be balanced against environmental considerations. (N.B. Only 20% of Cotswold District lies outside the AONB).</p>
<p><b>Environment Agency:</b> Policy SP8 - We are pleased that our comments have been taken on board regarding environmental constraints and have influenced the location of the proposed gypsy and traveller sites. We are keen to work with your authority with the development of the Local Plan and we will be pleased to attend any future meetings to move this forward.</p>	<p>Noted.</p>
<p><b>Tewkesbury BC:</b> The consultation document identifies the need to provide an additional 26 pitches for Gypsy and Travellers over the period 2013-31 in Cotswold District (in accordance with the GGTTSA 2013). It is noted that the plan identifies sites that meet the accommodation needs of gypsies and travellers to 2022 and that after this date CDC will need to establish suitable sites for the remainder of the plan period. The County-wide GGTTSA identifies a very significant proportion of the need arising for such sites within Tewkesbury Borough (147 Gypsy and Traveller pitches 2013-31). It is recognised that, depending on the availability of deliverable sites, it may be necessary to work with other Gloucestershire authorities to address this need. This should be undertaken through the Duty to Co-operate as set out by the Government policy document 'Planning Policy for Travellers Sites' (2012). As set out in the methodology for Tewkesbury Borough's site selection for Gypsies, Travellers and Travelling Showpeople (consultation end 2014), if evidence suggests that there is not a suitable</p>	<p>Agree that joint working with neighbouring authorities is critical to the process and that, in any event, it is a requirement to meet the duty to cooperate.</p>

<p>number of available sites, TBC will consider investigating the need for assistance from neighbouring authorities. Therefore, TBC looks for continued joint working on this matter as both development plans progress.</p>	
<p><b>Great Rissington PC:</b> Oppose site CDC6: (i) falls within a conservation area and is close to several heritage sites; (ii) has extremely limited access (a single farm track of some 300 metres in length); (iii) lacks access to local services (most of which are in Bourton (3-4 miles away) or Stow (5-6 miles away) and utilities; and (iv) would result in loss of amenity for a large number of residents in Greens Close, Rectory Lane and Lane End.</p>	<p>These points, in themselves, would not necessarily justify the deletion of this site from the plan. The site could be reviewed by a SHLAA Panel, which would take into account the latest available evidence and guidance.</p>

## HABITAT REGULATIONS ASSESSMENT

<p><b>Natural England:</b> Effects on European Sites uncertain. Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution, erosion/ trampling or general disturbance from recreation, or increased demand for water abstraction and treatment.</p>	<p>Potential mitigation measures, if identified as being needed, could include the use of good practice construction techniques, traffic management and the provision of sustainable transport alternatives, visitor management and the provision of alternative greenspace as well as the upgrading of water treatment infrastructure.</p> <p>Detailed policies will be produced later in 2015 including some aimed at addressing these themes and avoiding/ mitigating likely significant effects on European sites.</p>
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## APPENDIX B – SUMMARY OF REPRESENTATIONS ON REG.19 SUBMISSION DRAFT CONSULTATION (JUNE 2016) AND COUNCIL’S RESPONSES

ISSUES RAISED	RESPONSE/ ACTION
<p>Section 8.7 not sound. It does not adhere to NPPF or PPTS. Major impact of sites GT5 and GT8 at Seven Springs (which already have temporary planning permission) on AONB and Cotswold Way. A lack of supply is no longer sufficient justification to allow development of traveller sites in the AONB. Seven Springs sites dominate the nearest settled community and place undue pressure on the local infrastructure, notably roads. Permanent development of this type would detract from the amenity of the area.</p> <p>Planning permission for sites GT5 and GT8 - Hartley Lane, Coberley are temporary sites/unapproved sites; these are still undergoing assessment. Inclusion here prejudices the results of such considerations, particularly in relation to AONB, and does not accord with revised PPTS (Aug 2015), or NPPF 115.</p>	<p>The only reference to AONB designations in PPTS (Aug 2015) is para 27, though this is within the context of Policy H (Determining planning applications). There is no clear guidance to explain where sites should/not be allocated other than the need to be consistent with the NPPF. It does require LPA's to identify a “<i>supply of specific deliverable sites</i>” (para 10). Para 13 sets out sustainability criteria that policies should consider, though they do not refer to AONBs. Both NPPF and PPTS place a priority on ensuring a supply of sites. The gypsy and traveller sites identified in the Plan are sufficient to meet the need arising from the new definition of travellers (3). However, they are insufficient to also meet the needs arising from households that do not meet the new definition (13) and unknowns (1). 1 pitch + 2 reserve pitches at Seven Springs would not place an undue pressure on the local infrastructure.</p>
<p>There is no likelihood of site GT9 Meadowview (erroneously called Meadowland) coming forward. It should be deleted.</p>	<p>There appears no overriding reason to delete this site. Minor changes needed to correct name of site in 8.7 and Appendix C.</p>
<p>Policy H7 (4) should state that any new developments should prioritise the use of previously developed land and untidy/ derelict land. It should further state that sites should not be in areas that will harm or impact on the AONB</p>	<p>The draft Plan includes environmental criteria, which provide sufficient guidance without including additional criteria in H7. See above re. AONB and paucity of potential sites to meet needs.</p>