South Gloucestershire Council
Delivering for you

South Gloucestershire New Local Plan Regulation 19 – publication plan

Evidence paper:

Proposed allocations and policies for Gypsy, Traveller and Travelling Showpeople communities

Contents

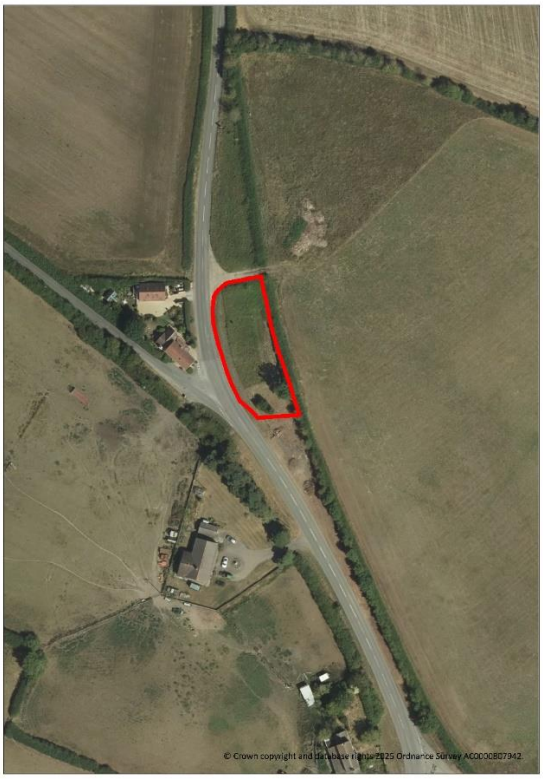
1. Introduction 1
2. Background and context 2
Gypsy/ Traveller provision – relevant policy and legislation 2
Inequalities experienced by travelling communities 2
The requirements of Equalities legislation 3
History of unmet need in South Gloucestershire 4
3. Assessment of need 6
Position in relation to the revision of definitions within PPTS Annex 1 6
Level of need in South Gloucestershire 8
4. Approach to meeting needs through the local plan process 10
Land submitted through previous Call for Sites 11
Potential new sites for allocation – Council-owned land 11
Potential provision on sites promoted by the Gypsy, Traveller, Travelling Showpeople community 12
Remaining need for private provision 12
Other potential sources of supply 13
5. Updated policy approach – criteria based policy 14
6. Conclusion and next steps 15
Appendix A: Assessment of sites (methodology*) 17
Stage 1: sift of identified land 17
Stage 2: Site assessment 18
Stage 3: Sustainability Appraisal (SA) 20
Stage 4: Habitats Regulation Assessment (HRA) 21
Stage 5: Deliverability 21
Appendix B: Site details 23
Sites currently the subject of planning applications 23
Sites submitted to through the ‘call for sites’ which have subsequently been granted planning permission 23
Intensification sites 23
Expansion sites 25





.....26

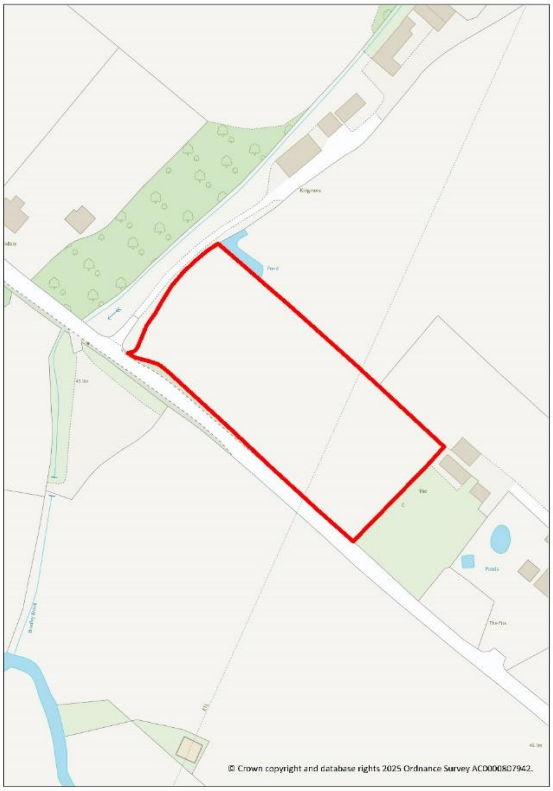
New sites to meet Gypsy and Traveller social needs.....32





.....37


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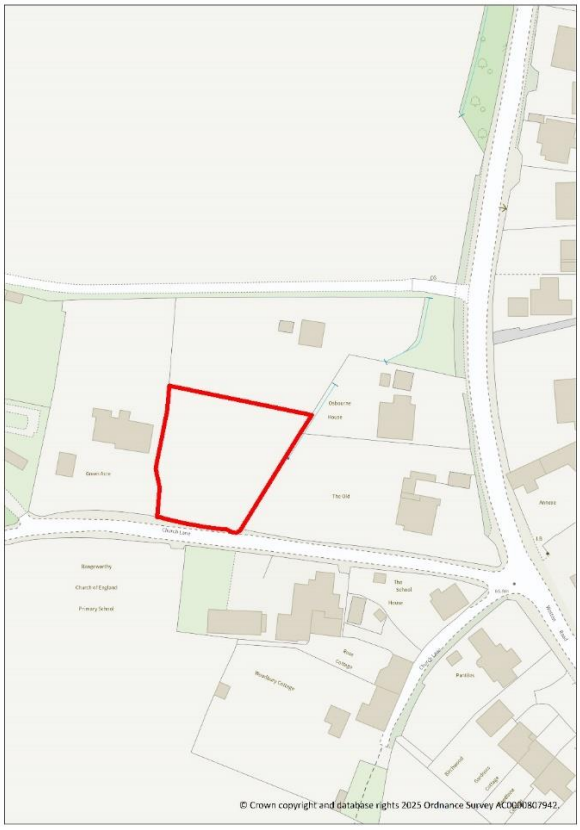
.....47

New sites to meet Gypsy and Traveller private need.....49


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..... 58

Sites for Travelling Showpeople 60



.....61
Appendix C - Sites not taken forward.....63

1. Introduction

1.1 The Council, in its capacity as the local planning authority (LPA), has published the new South Gloucestershire Local Plan (SGLP) Publication (Regulation 19) version[1] for a six week period from 28 February 2025 to 11 April 2025. In line with Regulation 20, stakeholders are invited to make representations on the Plan between the dates above. Details about how to comment on the Plan are available on the Council's website Have Your Say Today - Local Plan Reg 19 – Commonplace.

1.2 Once this consultation is complete, the Plan will be submitted to the Secretary of State (in line with Regulation 22) later in 2025. Once adopted, the SGLP will form part of the Development Plan for South Gloucestershire, and its policies and proposals will guide development across the area through the plan period (2026-2041).

1.3 The purpose of this paper is to set out the background and justification for the approach the Council, in its capacity as the local planning authority (LPA) is proposing to the provision of accommodation for South Gloucestershire's Gypsy, Traveller and Travelling Showpeople communities, set out in Policies LPS5 (Accommodation for Gypsies and Travellers) and LPS6 (Accommodation for Travelling Showpeople). This paper builds on and supersedes the Topic Paper published alongside the Phase 3 (Regulation 18) consultation which ran from 6 December 2023 to 16 February 2024.

1.4 While much of the background and context set out below relates to the accommodation needs of Gypsies/ Travellers in South Gloucesterhsire, largely owing to the historic situation (set out below at section 2), for the most part the Council proposes a consistent approach to provision for its community of Travelling Showpeople.

1.5 This paper starts by setting out the background and context with regard to national planning policy, equalities considerations and the local context. It then goes on to set out how the Council has assessed and approached the need for accommodation, and how it proposes to meet the need through site allocations in the Local Plan and supported by new criteria based policies that will be used to inform decision-making through the Development Management (planning application) process.

[1] You can read the pre-submission publication of the new Local Plan and related documents at www.southglos.gov.uk/reg19localplan.

2. Background and context

Gypsy/ Traveller provision – relevant policy and legislation

2.1 Since 1994, national planning policy has required local planning authorities to assess the accommodation needs of Gypsies and Travellers in their areas, and identify land to meet these needs through their development plans (now referred to as Local Plans). In 2016, the Housing and Planning Act (section 124) introduced duty in the Housing Act 1985 for councils to consider the needs of people residing in or resorting to their district in respect of caravan sites and houseboats (which includes Romany Gypsies, Irish Travellers and Travelling Showpeople).

2.2 National planning policy for Travellers is set out in Planning Policy for Traveller Sites (PPTS), an update to which was published in 2024. It has the same status as, and should be read alongside, the National Planning Policy Framework (NPPF). PPTS sets out that the Government's overarching aim is to "… ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community."

2.3 To this end, local planning authorities should (*inter alia*):

- make their own assessment of need for the purposes of planning;
- develop fair and effective strategies to meet need through the identification of land for sites;
- set out fair, realistic and inclusive policies.

2.4 As such PPTS requires local planning authorities to identify land to meet the accommodation needs of its Gypsy, Traveller and Travelling Showpeople communities in the same way that it identifies land to meet the need for 'mainstream' or traditional housing in their administrative areas.

Inequalities experienced by travelling communities

2.5 Further to the legislative and policy requirements set out above, it is important to put Gypsy and Traveller provision into a social context. There is a widespread acceptance that Gypsies and Travellers are amongst the most marginalised groups in the country, and there is a wealth of evidence illustrating the disproportionate health and education outcomes experienced by these communities in comparison to other groups of the population. Examples of this for Romany Gypsies and Irish Travellers in comparison to the general population include:

- Health outcomes
    - Life expectancy – between 10 and 25 years shorter.
    - Mental health issues – twice as likely to experience depression; three times as likely to experience anxiety.
    - Suicide – six times more likely.

    - More likely to have a long term illness, or experience chest pains, arthritis or respiratory problems.

- Education outcomes[2]
    - Gypsy, Roma and Irish Traveller pupils' attainment was below the national average at all key stages.
        - Primary – in 2018/2019, 19% of White Gypsy or Roma pupils, and 26% of Irish Traveller pupils met the expected standard in key stage 2 reading, writing and maths, compared with 65% across all other ethnic groups. These were the 2 lowest percentages out of all ethnic groups.
        - GCSEs – in 2019/2020, 8.1% of White Gypsy or Roma pupils in state-funded schools in England got a grade 5 or above in GCSE English and maths, the lowest percentage of all ethnic groups. In comparison, 20% of Irish Travellers got a grade 5 or above in GCSE English and maths, and 49.9% across all other ethnic groups.
        - Gypsy or Roma (58%) and Irish Traveller (59%) pupils were the least likely to stay in education after GCSEs (and equivalent qualifications).

2.6 It is widely acknowledged that a lack of secure accommodation underpins the inequalities that these groups experience, illustrated above.

2.7 Furthermore, 2021 census data indicates that many within the Gypsy and Traveller communities need socially provided accommodation. In comparison with the England and Wales population, people who identified as Gypsy or Irish Traveller were:

- four times less likely to own their accommodation with a mortgage, loan or shared ownership (9.5% compared with 35.6%)
- over twice as likely to live in social rented accommodation (42.3% compared with 16.6%)

2.8 In recognition of this inequality, Planning Policy for Traveller Sites cites the importance of considering the needs of those travellers who cannot provide their own sites, and require socially provided provision, in the same way that Affordable Housing provides for those are unable to access the market for mainstream/ traditional housing.

The requirements of Equalities legislation

2.9 Putting the above into the context of the Council's legal responsibilities, the Public Sector Equality Duty (Equality Act 2010) requires public authorities in the exercise of their functions, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.

[2] Source: Gypsy, Roma and Irish Traveller ethnicity summary - GOV.UK Ethnicity facts and figures

- Foster good relations between people who share a protected characteristic and those who do not.

2.10 These are sometimes referred to as the three aims or arms of the general equality duty. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

2.11 Romany Gypsies and Irish and Scottish Travellers are recognised ethnic minorities for the purpose of the Public Sector Equality Duty. Given that the inequalities faced by these communities are often underpinned by a lack of secure accommodation, having due regard could be considered to include identifying land to meet the needs of these communities.

2.12 Furthermore, given that a larger proportion of Gypsies and Travellers than the general population require socially provided accommodation it is important that the Council considers the role it could play, and through working with partners, identify opportunities to meet the needs of those who cannot afford to provide accommodation for themselves.

History of unmet need in South Gloucestershire

2.13 There has historically been a persistent level of unmet need for accommodation for Gypsies, Travellers and Travelling Showpeople in South Gloucestershire.

2.14 In 2006 the Secretary of State (SoS) directed the Council to amend its Local Development Scheme to include a Gypsy & Traveller Development Plan Document (DPD). The SoS, via the formal Direction, was explicit in stating that there is a clear and immediate need to bring forward a specific Gypsy and Traveller DPD containing site allocations. A deadline of March 2008 was given for the submission of this document. The Ministerial Direction has never been withdrawn and adds weight to the case for making provision.

2.15 Through preparing various Local Plans, previous attempts to address the accommodation needs of these communities (through bringing forward additional provision) have not borne fruit and no land has been allocated to meet the needs of our communities through the Local Plan process. As a result, aside from the two socially provided, Council-owned sites in South Gloucestershire, all provision for these groups has been brought forward through the Development Management process to meet the private/ individual needs of the applicant.

2.16 Furthermore, recent planning appeals have been unequivocal on this issue, as illustrated by a planning inspector's decision to allow an appeal on a site located within both the Green Belt and Flood Zone 3b. In this instance the Inspector found that:

49…There is no strategy to address outstanding need through the development plan process that can be given any weight at present, and there is a history of policy failure in this regard, the Council having been directed by the Secretary of State to make significant improvement to supply and delivery. Save for the criteria for assessing windfall sites and the objective to safeguard existing authorised pitches at specified sites, CS Policy CS21 is out of date.

50. Further, the Council has not been able to point to any suitable and available alternative sites for the appellants within the District or the wider area, and it has acknowledged that it is likely that many, if not most, new sites that will have to be found will be in what is currently Green Belt.

51. These are all matters to which I accord substantial weight in favour of the appeals.

2.17 As a result of the position described above, until the new Local Plan is adopted, the Council is unable to demonstrate it is meeting the requirements of national policy in full or part (set largely through PPTS). The implications of this position are that the needs of our communities, many of whom are also ethnic minorities, are not being met. It also means that the Council's ability to defend against development proposals in inappropriate locations (through both the application and appeals process) is significantly reduced.

2.18 Given the context (set out above), the Council considers that the time has come for a significant step change in the way that it provides for the needs of its Gypsy, Traveller and Travelling Showpeople communities. The new South Gloucestershire Local Plan (SGLP) represents an important opportunity to effect this change.

3. Assessment of need

3.1 The Council, in its capacity as the local planning authority (LPA) is required to make an assessment of 'travellers'[3] accommodation needs for the purposes of planning. To this end, Opinion Research Services (ORS) were appointed to undertake an update of its evidence base, the Gypsy and Traveller Accommodation Assessment (GTAA). The primary objective of doing so was to provide a robust updated assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in South Gloucestershire to inform the preparation of the new Local Plan. The Gypsy and Traveller Accommodation Assessment (GTAA) November 2023 report can be found on the https://beta.southglos.gov.uk/local-plan-2020-evidence-base/.

3.2 ORS have also prepared consistent and comparable needs assessments which cover the same time period for the other West of England unitary authorities, to inform the preparation of their respective local plans.

Position in relation to the revision of definitions within PPTS Annex 1

3.3 In December 2024, the Government published revised planning guidance in 'Planning Policy for Traveller Sites' (PPTS) as well as updating the National Planning Policy Framework. The most significant amendments were with regard to the definition of Gypsy and Travellers and Travelling Showpeople ('travellers') and the Green Belt.

3.4 Previously, in 2015 the government adopted definitions (in Annex 1) for Gypsies and Travellers and Travelling Showpeople which excluded those who had ceased to travel permanently for reasons such as ill health or old age, preventing them from being considered a Gypsy/ Traveller or Travelling Showperson for the purposes of PPTS.

3.5 At this time the Council was in the process of commissioning a new GTAA (Gypsy and Traveller Accommodation Assessment), as the previous study was considered to be out of date for a number of reasons, including the publication of updated guidance in PPTS. Following consideration of the way the GTAA had assessed need and the potential implications for its local planning authority functions, the Council set out how it proposed to apply the definition (as this is a policy response at the discretion of the LPA) through an explanatory note published in 2018, which set out that:

> *"… reliance on a definition based only on those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence would place an over-reliance on the economic aspects of travelling as the determinant of constituting a Gypsy and Traveller. Moreover, this would not include those who commute to work daily or those who travel for purposes other than work such as visiting horse fairs and visiting friend or relatives.*

[3] PPTS uses the term "travellers" to refer to both "gypsies and travellers" and "travelling showpeople" as defined in Annex 1.

As a result, this would exclude consideration of important social/ cultural elements associated with the 'nomadic habit of life'. Consequently, applying such an approach would have significant implications for the Council, both in terms of the way it carries out its planning functions (policy, development management and enforcement) and its responsibilities under the Equality Act 2010.

… basing an assessment of need on economic considerations alone does not fully address the Council's responsibilities in terms of its planning and equality duties. As these groups have a legal right to 'culturally appropriate accommodation, in practice the degree to which Gypsy and Travellers are still considered to travel should not, from the Council's perspective, be taken as determining the actual level of demonstrable need in South Gloucestershire."

3.6 This approach to the need identified by the GTAA, which was commended in a report by the Equalities and Human Rights Commission report on the revised planning definition's impact on assessing accommodation needs has subsequently been continued in South Gloucestershire.

3.7 In 2022, the Court of Appeal found the PPTS 2015 definition to be discriminatory in Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391. The definitions of both Gypsies and Travellers and Travelling Showpeople were subsequently amended (through updates to PPTS) in 2023 to include those who had ceased to travel on a permanent basis for the reasons listed.

3.8 In 2024, through further revisions to PPTS, a new definition has been provided, which expands whom can be found to be a Gypsy or Traveller to now include all ethnic Gypsies and Travellers. The government has provided the following justification for the amendment:

In light of both domestic and European Court judgments, we have changed the definition of "gypsies and travellers" set out in the Planning Policy for Traveller Sites. The amendment seeks to ensure that the accommodation needs for those persons with a cultural tradition of nomadism or of living in a caravan are covered by the Planning Policy for Traveller Sites.

3.9 The revised definition (from Annex 1) is as follows:

"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, and ***all other persons with a cultural tradition of nomadism or of living in a caravan,*** *but excluding members of an organised group of travelling showpeople or circus people travelling together as such." [emphasis added]*.

3.10 On the basis of the above, the Council considers that the approach it has taken is consistent with the changes to (the definition of a Gypsy/ Traveller or Travelling Showperson for the purposes of) PPTS. As a result, it is considered that there is no need to

update the evidence base at this stage, but notes that an updated assessment of need will be required to inform a review of this Local Plan in due course.

Level of need in South Gloucestershire

3.11 As set out previously, there has historically been a persistent level of unmet need for accommodation for Gypsies, Travellers and Travelling Showpeople in South Gloucestershire.

3.12 Need for Gypsy/ Traveller provision is expressed in terms of a number of pitches, while need for Travelling Showpeople is expressed in number of plots. There is no official definition of what constitutes a 'pitch' or a 'plot', but generally consider these terms as set out below:

> A 'pitch' is a unit of accommodation occupied by a single family of gypsies or travellers. It typically comprises two or more touring caravans with an amenity block or a more permanent structure such as a static caravan that does not move from the site.
>
> A 'plot' is a unit of accommodation occupied by a single family of showpeople. It can be similar to a traveller pitch but can also be a conventional bricks and mortar dwelling. However, a show person's plot will also normally include space to store and maintain equipment used for the business such as fairground rides or hot food trailers.

3.13 Through taking the approach described above, the Gypsy and Traveller Accommodation Assessment gives the following level of need (which has been updated to take account of planning permissions granted for additional private provision since the GTAA was undertaken[4]):

- 119 new pitches for Gypsies/ Travellers in the period 2022-2042, split between 76 private pitches and 43 socially provided pitches; and,
- 59 new plots for Travelling Showpeople in the period 2022-2042[5].

3.14 At this stage, the Council considers the figures set out above to represent the level of demonstrable need for pitches for Gypsies/Travellers and plots for Travelling Showpeople which it should aim to provide for through its Local Plan.

3.15 Details in relation to how the Council proposes to plan for these needs are set out in subsequent sections of this paper.

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[4] Updated need figures take account of applications approved since the Local Plan Phase 3 document was published.

5 None of the TSP sites in South Gloucestershire are provided on a social basis. The 2007 West of England: Gypsy Traveller Accommodation Assessment reported that: *We were repeatedly advised that respondents did not want the local authority to provide for them, but that they required information as to where they could apply to set up Showmen's yards to provide accommodation for their families.* As such, no social provision figure has been included.

4. Approach to meeting needs through the local plan process

4.1 The lack of available suitable land for use by Gypsy/ Traveller and Travelling Showpeople communities is an issue that is commonly faced. To illustrate this point, research by Friends, Families and Travellers in 2020 showed that of 68 local planning authorities in the South East region, only 8 had identified the land needed for Gypsies and Travellers in their area. With this in mind, it is important that the Council can demonstrate it has investigated all potential sources of land available to us at this stage, including land within the Green Belt. The methodology the Council has used to do this can be found at Appendix A[6].

4.2 With specific regard to the Green Belt, given that circa 80% of existing authorised Gypsy/ Traveller sites and circa 20% of existing authorised Travelling Showpeople sites are located within the Green Belt, the Council has accepted from the outset that it will be necessary to remove land from the Green Belt, in line with PPTS. Specifically, paragraph 17 of PPTS sets out that:

> *Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.*

4.3 By looking at the level of existing provision in the Green Belt, and then considering the available land for allocations, the Council considers that there is not sufficient land available outside of the Green Belt to meet the need in full.

4.4 Further to the removal from the Green Belt of new sites and those where limited expansion (beyond existing site boundaries) is proposed, the Council is proposing to remove all existing authorised sites from the Green Belt. This is for two reasons. First, it will ensure that any intensification within the sites boundaries is in principle acceptable (subject to consideration of detailed issues through the planning application process. Second, as a high proportion of existing sites within the Green Belt are subject to a personal use or time limit condition, without removing them they would not be able to be part of the general supply and available to other Gypsies/ Travellers or Travelling Showpeople (as appropriate).

4.5 This was a point addressed in a recent appeal decision letter regarding the removal of a personal condition on a Green Belt site:

> *28. The development would bring the site back into authorised use and secure five pitches to address need and supply on a permanent basis. The point was made that the propensity for decision makers to only grant personal permissions for Gypsy and*

[6] N.B. the methodology has been updated since it was originally published as part of the Phase 3 Local Plan consultation, to include an updated approach to site size.

Traveller sites in the Green Belt in South Gloucestershire has been a key factor in contributing to its longstanding policy failure, given that when the occupants leave or pass on, the sites lose their authorised purpose. I have sympathy with this argument, and it is a consideration of significant weight.

4.6 Turning now to the specific land typologies the Council has considered, the approach taken to date is to investigate the potential:

- suitability of land submitted through previous Call for Sites;
- suitability of land owned by the Council for allocation to meet social needs; and
- suitability of land promoted by the Gypsy/ Traveller and Travelling Showpeople communities for allocation to meet private needs.
- of any other realistic sources of supply.

Land submitted through previous Call for Sites

4.7 The purpose of the 'call for sites' is to provide an opportunity for people to identify sites they think may have the potential for development (for housing and economic purposes) through the new Local Plan. To date, we have invited the submission of sites to be considered through the Housing and Economic Land Availability Assessment (HELAA) process for their suitability for potential allocation through the Plan.

4.8 Through this exercise the number of sites submitted specifically for consideration as Gypsy/ Traveller or Travelling Showpeople use was very limited. Of those sites submitted previously for intensification of use (on existing authorised sites), the majority have subsequently been promoted and delivered through the Development Management process. Details of this can be found at Appendix B.

Potential new sites for allocation – Council-owned land

4.9 As trailed through the approach set out at Phase 3, the Council has undertaken a review of its land holdings in order to identify whether any potential exists for new sites to be delivered from this source.

4.10 First, an initial, high-level sift, based on general locational considerations and size thresholds was undertaken, to remove parcels of land that were considered unlikely to be appropriate for Gypsy, Traveller or Travelling Showpeople use. This exercise left a total of 56 sites to consider. Through applying the site assessment methodology, land to deliver 36 new social pitches over 8 sites for Gypsies and Travellers and 15 plots over 1 site for Travelling Showpeople. Details of these sites can be found at Appendix B and the list of sites not taken forward can be found at Appendix C.

4.11 Specifically with regard to the proposed socially provided sites, it is useful to note that they are proposed to deliver 8 pitches or less. The majority of private sites in South Gloucestershire are 6 pitches or under which indicates a preference within the community for small family sites. This is expanded upon by qualitative evidence from the West of

England Gypsy and Traveller Accommodation Assessment from 2007 which stated that focus groups had:

> *…some clear ideas about the kind of provision that worked best such as good size accommodation blocks, a site design which promoted privacy, and separate provision for different cultural groups.*

4.12 Generally, there is a preference for smaller family sites, but the relatively larger size of many socially provided Gypsy and Traveller sites does not reflect that. Smaller sites are generally considered to be better suited for both the site residents and wider communities. As such, the Council is looking at the provision of a number of smaller sites designed for family groups in order to create high quality, safe and secure living environments which will be better accommodated within existing communities. Experience from elsewhere shows that such sites could be cost neutral and have lower management costs. Work to illustrate the potential options for delivery of sites to meet the need for new social provision is underway and will be provided to support the Local Plan submission later this year.

Potential provision on sites promoted by the Gypsy, Traveller, Travelling Showpeople community

4.13 Policy A of PPTS requires the Council to undertake effective community engagement. As well as undertaking the GTAA, work has been undertaken supported by specialist officers from the Corporate Traveller Unit to engage with South Gloucestershire's Gypsy/ Traveller and Travelling Showpeople communities to understand whether there was land in individuals'/ families' ownership that might be suitable to provide additional pitches or plots. This informal engagement included visiting sites, sending out targeted letters to the community, and the setting up of a dedicated phone line for community members to contact to provide relevant information.

4.14 From this work, potential has been identified for an additional:

- 31 new pitches to be delivered through intensification on 7 specific existing authorised sites;
- 11 new pitches to be delivered through the limited expansion of 3 specific existing authorised sites; and,
- 21 new private pitches from 5 new sites.

4.15 In total, as set out above, the potential for 63 new private pitches to be delivered through land promoted by South Gloucestershire's Gypsy/ Traveller and Travelling Showpeople communities. Details of these sites can be found in Appendix B.

Remaining need for private provision

4.16 Taken together, through the three typologies identified above, a total of 63 new private pitches are proposed for allocation through the Local Plan, against an overall need for 76. It is anticipated that the remaining 13 pitches will be delivered through the Development Management process, or potentially through considering the suitability of any

new sites submitted through future stages of the Local Plan process or, as a last resort, through a review of the Local Plan.

Other potential sources of supply

4.17 As set out previously, it is important that the Council investigates all potential sources of land available. With this in mind, it may be that there are sites that have been submitted as part of the HELAA process which do not form part of the Local Plan's overall strategy for homes and jobs, and which could potentially be taken forward for Gypsy, Traveller or Travelling Showpeople use. The potential for this to form part of our emerging strategy is being considered in the context of identifying provision to meet the remaining need for private provision.

4.18 The Council has also explored the potential for provision to be made through the planning and delivery of the strategic urban and village extensions (SUaVEs) proposed through the new Local Plan. Experience from elsewhere demonstrates that the delivery of accommodation for Gypsy/ Traveller or Travelling Showpeople on strategic sites can be problematic. Some developers believe that it will impact on viability and are resistant. Even where pitches are allocated on strategic sites, it is often the case that they remain unbuilt, or there are issues over phasing and delivery resulting in either provision taking many years to make or, in some cases, not happening at all.

4.19 With this in mind, the Council considers that it is appropriate to require that strategic sites make financial contributions to facilitate the provision of social Gypsy and Traveller sites. This makes it even more imperative for the Local Plan to meet the socially provided need from land owned by the Council. The reason for this is that in the event of the plan being unable to allocate sufficient land for private provision, there is a reasonable expectation that this need will be met through the contribution of windfall sites. This is backed up by the evidence of the last 5 years which shows an average of four pitches per year being given planning permission[7]. The same fallback position, for additional social provision to be delivered by private individuals through the Development Management process, is not considered likely. Opportunities to remedy this position (and meet in full the social needs identified) will be considered going forward, and any potential updates will be set out in due course.

4.20 For Travelling Showpeople, the availability of suitable land is more of an issue, as evidenced by the current lack of sites that have come forward for allocation (through the typologies described above). As things stand, the Local Plan will be unable to allocate sufficient provision to meet the identified need for Travelling Showpeople. To address this, the Council is undertaking further targeted consultation with the community. If this work bears no fruit, the Council will consider other options such as contacting the promoters of sites which have not been taken forward in the Plan for other uses.

4.21 With the above in mind, the Council would welcome the submission of sites for consideration for their suitability for allocation for use by Travelling Showpeople.

[7] NB this includes the period of the Covid 19 pandemic

5. Updated policy approach – criteria based policy

5.1 In addition to the search for and allocation of specific sites to meet identified needs through the Local Plan, the Council aims to increase provision for Gypsies, Travellers and Travelling Showpeople by setting out updated criteria-based policies. To this end, Local Plan Policy LPS5, relating to accommodation for Gypsies and Travellers, and LPS6, relating to accommodation for Travelling Showpeople are presented in the new South Gloucestershire Local Plan (SGLP) Publication (Regulation 19) version.

5.2 The criteria-based policies are designed to facilitate site development whilst ensuring that new sites being brought forward through the Development Management process provide a high quality of life for those living upon them. This policy approach includes an acknowledgement that, due to the nature of South Gloucestershire no location should be excluded on the basis of distance to services. Notwithstanding this, the Council's preference is that proposals be located within appropriate distance to key services and facilities.

5.3 Since consultation on the Phase 3 Local Plan, paragraph 16 of Planning Policy for Traveller Sites has been amended, and now states:

> *16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in chapter 13 of the National Planning Policy Framework apply.*

5.4 With this change to national policy in mind, the wording of the proposed policies has been amended to simply have regard to national planning policy. Furthermore, the Council has also taken the approach of including within the policy wording its preference that the loss of existing sites is resisted, to ensure that potential general supply is not reduced by development proposals for other land uses.

5.5 As such, the Council considers that the approach taken in the proposed criteria based polices will in and of itself lead to a greater level of site provision.

6. Conclusion and next steps

6.1 In terms of need, in its role as the local planning authority, it is important that the Council plans to meet the needs of the Gypsy/ Traveller and Travelling Showpeople communities in South Gloucestershire. Doing so will also ensure that the Council is also meeting its responsibilities in relation to equalities legislation.

6.2 The Council has assessed the need for accommodation, and this need assessment is considered to be compliant with recent national policy changes. As such, Policy A of PPTS has been complied with.

6.3 Through a considered process of community consultation and considering its own land holdings the Council have identified sufficient land to provide for a significant number of private and social pitches for Gypsies and Travellers to be delivered.

6.4 It is worth noting that there are at present a number of planning applications (for additional private provision for Gypsies/ Travellers) awaiting determination, which could contribute to meeting needs.

6.5 For Travelling Showpeople, the Council has identified land from its own estate to provide a site of 15 plots to be delivered. As such, there remains unmet need and, as set out above, the Council is considering further work to identify further opportunities for provision for Travelling Showpeople.

6.6 With the above in mind, further work will be done to consider delivery timescales, as this will impact upon the 5 year supply of sites calculation. Further information on this position will be provided in due course, to ensure that the evidence on supply relating to Gypsies, Traveller and Travelling Showpeople will be up to date at the point at which the Local Plan is submitted to the Secretary of State. Therefore, as it stands, the requirements of Policy B of PPTS have been met in part.

6.7 Finally, the Council has set out updated criteria-based policy in order to ensure that any remaining need at the point at which the Local Plan is submitted is able to be met through the Development Management process. As such, the requirements of Paragraph 11 of PPTS have been met.

6.8 Taken together, the Council considers that the approach proposed to meeting the needs of South Gloucestershire's Gypsy, Traveller and Travelling Showpeople communities is positively prepared, justified, effective and consistent with national policy and compliant with relevant legislative requirements.

Appendix A: Assessment of sites (methodology*)

The following draft site assessment methodology has been developed having regard national policy and guidance, and to best practice, set in the local context of a high level of demonstrable need.

Stage 1: sift of identified land

Once land has been identified from the sources detailed above (and any others suggested through consultation), the following methodology (subject to any changes suggested through consultation etc.) will be applied.

Site size

The HELAA methodology uses a minimum size threshold of 5 dwellings or 0.25 ha (housing development) and 500 sq.m. floorspace (economic uses). It is more problematic to arrive at an appropriate minimum size for a Gypsy/ Traveller site. PPTS does not provide any guidance and the now withdrawn 'Designing Gypsy and Traveller Sites Good Practice Guide' (DCLG, 2008) also declines to offer any suggestions on a minimum area, instead stating that:

> *"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."*

The guidance adds that a pitch should be able to accommodate "two touring caravans, two parking spaces and private amenities." In accordance with the 2008 guidance, it is often suggested that 0.2 ha be used as a minimum size threshold as this can accommodate about 4 pitches and in those examples, any sites below this size threshold would not be considered for assessment.

However, such is the need for pitches within South Gloucestershire, we consider that sites potentially capable of accommodating a single residential pitch should be considered at this stage. With this in mind, sites of over 0.05ha will be considered initially. When considering the capacity of a site we worked on the basis of each pitch requiring 500m2 on average. We went onto consider the number of pitches that could be provided on a site, in particular with regard to the proposed social provision. The majority of private sites in South Gloucestershire are 6 pitches or under which indicates a preference within the community for small family sites. This is supported by qualitative evidence from the West of England Gypsy and Traveller Accommodation Assessment from 2007 which stated that focus groups had:

…some clear ideas about the kind of provision that worked best such as good size accommodation blocks, a site design which promoted privacy, and separate provision for different cultural groups.

The provision of a number of well designed small socially provided public sites would meet these aspirations.

In 2010, the Showmen's Guild of Great Britain prepared a document 'Travelling Showpeople's sites: a planning focus – model standard package). This document was intended to provide guidelines to Travelling Showpeople and Local Planning Authorities when considering the needs of Travelling Showpeople. This document recommended that the minimum size of a plot is 0.5ha and should include space for residential accommodation and equipment storage. However, a review of the size of existing TSP sites in South Gloucestershire and elsewhere, and informal consultation with the community has led us to revise this figure down to 0.2 hectares. This size is sufficient to accommodate the needs of the majority of TSP. On land currently owned by the council, we have used a figure of 15 yards as existing TSP sites in South Gloucestershire are around this size.

Private sites are almost all owner occupied. As such, whilst we have we have considered residential amenity and site licence requirements we have not set specific sizes as the pitch requirements will vary from site to site.

General approach to location

Planning Policy for Traveller Sites explicitly accepts that sites will be found in rural location. It also gives a wider construction of sustainability which takes into account factors beyond proximity to services. It is considered that the level of need and the nature of South Gloucestershire means that no site should be discounted due to location. Notwithstanding this, the council's preference is that sites should be within close to services and this has been reflected in the wording of the policy. N.B. Not all of the sites identified at Stage 1 will necessarily be appropriate for allocation.

Stage 2: Site assessment

Stage 2 involves the detailed assessment of the sites identified. This will involve estimating the development potential of the identified sites, as well as their suitability, availability and achievability, including whether constraints can be overcome.

2a: Desk-based assessment of constraints (GIS)

Stage 2a would comprise an initial desktop filtering exercise using GIS data to sieve out those sites that are subject to fundamental 'showstopper' constraints.
It is considered appropriate that the starting point for this assessment should mirror as far as possible the Council's Housing and Economic Land Availability Assessment (HELAA). NPPG (Paragraph 014) makes clear that when taking into account national policy and designations, there may be some sites and broad locations which are clearly not suitable. A number of major constraints which are considered to be 'showstoppers' have been identified based on policy and good practice in alignment with the WECA and UA SHLAA and HELAA methodologies.

Where a site or broad location is wholly affected by a major constraint(s), it will be discounted at this stage. Where a site or broad location is partially affected by a major constraint(s), the unaffected part of the site or broad location will be taken forward (provided it meets the site size thresholds). This approach reflects national policy (NPPF footnote 7) and guidance by allowing the HELAA to focus on those sites and locations with reasonable potential.

The following designations are considered major constraints:

- Ancient Woodland
- Common Land
- Flood Zone 3b
- Health and Safety Executive Inner Zones
- International ecological sites (SAC/SPA/RAMSAR/SSSI)
- Local Nature Reserves
- Open Access Land
- Mineral Safeguarded Sites
- National Nature Reserves
- Nationally Registered Parks and Gardens
- National Trust Inalienable Land
- Registered Battlefields
- Regionally Important Geological Sites
- Scheduled Monuments
- Sites already developed with no prospect of intensification or redevelopment (professional judgment)
- Working mineral sites

It is noted that the development of Gypsy/ Traveller sites within Flood Zone 3b is generally not considered appropriate, owing to the level of vulnerability of this land use.

Notwithstanding this, a recent appeal decision allowed development of a site in an area of high flood risk, on the basis that suitable mitigation could be delivered. With this in mind, owing to the level of need identified in South Gloucestershire it is considered appropriate at this stage to not remove such sites from further investigation.

Consideration of additional constraints identified in footnote 7 of the NPPF, such as Green Belt, Cotswold National Landscape and other site-specific constraints will be undertaken as part of the Stage 2b assessment set out below.

2b: Consideration of other non-absolute constraints

The purpose of this stage is to undertake a more detailed assessment of the remaining sites against a wide range of environmental, economic and social criteria.

As part of the assessment process, the potential impact on landscape, historic assets ecological designations, utilities, education, health facilities also need to be considered.

In order to assess the potential for this land use, a qualitative approach when analysing sites will be taken. All sites not excluded will automatically be taken forward to the next stage of the site selection process.

This approach ensures the site assessment follows a consistent approach with the existing site selection methodologies while further sifting sites that could meet the specific needs of the Gypsy and Traveller community. Proposed criteria will include assessing Gypsy and Traveller sites for:

- Existing land use. While there are benefits associated with a cleared site and the issues of conversion or demolition of buildings on site, which may impact on the viability and deliverability of Gypsy and Traveller sites, owing to the level of need, it is considered appropriate to not discount sites with existing structures on site at this stage.
- The environment for occupiers, including but not exclusive of, noise, odour, adjacent uses to the site i.e. industrial uses.
- Site access for vehicles (i.e. caravans) specific to the Gypsy and Traveller community needs to the highway.
- Site access will be considered in terms of whether direct access already exists onto either a residential road or a more significant road. Some sites may have no direct access, but it would be possible to create one and some sites have no direct access, and it may be judged not possible to create one. Sites with constrained access were also identified as this reduces their potential suitability. Access has to be sufficient for vehicles towing caravans.
- Site access for pedestrians to the highway.
- The existing users near the sites and to avoid unacceptable impact to the surrounding community, both residential and business users.
- Access to local facilities and services, including health, education and shopping facilities.

Sites which make it through Stage 2 will then be subject to Sustainability Appraisal and Habitats Regulation Assessment (HRA).

Stage 3: Sustainability Appraisal (SA)

Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of the Local Plan and is a key part of the evidence base of the Local Plan. The role of the SA is to promote sustainable development through better integration of sustainability considerations into Plan preparation and adoption. The SA is an integral part of good plan-making and should not be a separate activity. It is an iterative process that identifies and reports on the likely significant effects of a plan or strategy and the extent to which implementation of the plan or strategy will contribute toward sustainable development.

In line with the stages of the HELAA, sites that are carried forward from Stage 2 will be subject to SA. This is to ensure that sites which are deemed ‘reasonable alternatives’ are considered against the IIA objectives to determine their sustainability. Sites will be

considered against the objectives included in the SA Scoping Report, and subsequently updated following consideration of representations received at previous stages of plan preparation. These objectives can be viewed in the Local Plan Phase 3 Sustainability Appraisal.

The Sustainability Appraisal seeks to identify likely significant effect of development at each of the sites. In addition, and where possible it will also seek to identify ways in which the harmful effects of development may potentially be avoided or mitigated. Where appropriate potential adverse effect and suitable types of mitigation measures will be given consideration.

Sites that are taken forward for potential allocation will be informed by the overall outcomes of SA in addition to other evidence that emerges through or outside of the site assessment process. As with the approach taken for sites for other land uses, a summary of the SA for each site will be included in the site assessment sheet to ensure the selection of the most appropriate sites for inclusion in the emerging Local Plan.

Stage 4: Habitats Regulation Assessment (HRA)

The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 20071; the currently applicable version is the Habitats Regulations 2017 (as amended)2.
HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but, since 1st January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives
The HRA is a separate process focused on avoiding impacts to internationally designated biodiversity sites. Although there is no formal requirement to 'scope', a scoping report was prepared and has been shared with Natural England.

Stage 5: Deliverability

The purpose of this stage is to considers whether sites are or are not deliverable and the timescales and phasing of delivery. The starting point will be the assessment of achievability contained within the HELAA with supplementary criteria specifically applied to assess suitability for the allocation as a Gypsy/ Traveller site.

- Land ownership (e.g. private site put forward for Gypsy and Traveller use)
- Site infrastructure and delivery issues (e.g. mitigation measures required to meet specific site requirements such as utilities)
- Barriers to delivery (e.g. the site has been identified as a suitable site allocation for housing, employment, retail, infrastructure and other mixed use)
- Delivery approaches
- Site capacity taking into account constraints and other relevant factors (e.g. that sites are likely to be delivered within the timeframes of the Plan Period)

At this stage considerations will be given to the deliverability of the site with a high-level assessment of whether development is viable and to give an indication of whether there is a reasonable prospect of a site being delivered and when, a key requirement of national planning policy.

Appendix B: Site details

Sites currently the subject of planning applications

The following sites were promoted for intensification (on existing authorised sites) through the Phase 3 Local Plan consultation and are currently the subject of planning applications that are awaiting determination:

Stone Acre Norley Lane, Tormarton – 4 additional pitches (ref: P24/00773/F).

- Bank Road, Pilning (Meadow View) – 6 additional pitches (ref: P24/01126/RVC).

Should planning permission be granted for these proposals, the additional provision will be reflected in an updated position on need to be provided as part of the Submission of the Local Plan to the Secretary of State.

Sites submitted to through the 'call for sites' which have subsequently been granted planning permission

The following sites have been granted permission for additional Gypsy/ Traveller pitches:

- Bridge View, Westerleigh Road, Westerleigh – 1 additional pitch (ref: PK18/2925/F).
- Land at Henfield, Westerleigh Road, Coalpit Heath – 2 additional pitches (ref: P23/02252/F).

The following sites has been granted permission for additional provision for Travelling Showpeople:

- Land off Oldbury Lane – 1 plot (ref: P20/10400/F)
- The Willows, Hall End Lane, Wickwar – 4 plots (ref: P23/02850/F)

The additional provision these sites deliver have been taken into account in setting the position on need identified through this paper.

Intensification sites

The following sites are proposed for intensification:

Site name	No. additional pitches
Berwick Park, Berwick Lane (GTI01)	2
Henfield Paddock, Henfield (GTI02)	3
Hill View, Badminton Road, Nibley (GTI03)	4
Frampton Park, Bristol Road (GTI04)	8
Land North of Lime Kiln Court, Tytherington (GTI05)	4
Moor Paddock, Westerleigh Road, Pucklechurch (GTI06)	2
The Willows, Latteridge Road (GTI07)	8

As these allocations are for intensification of use (within the red line boundaries of existing authorised sites with planning permission), detailed development considerations are not required.

Although the principle of this intensification is agreed through the Local Plan, the sites listed above will still require planning permission to deal with detailed issues such as layout in order for the additional units to be delivered. This will, as a matter of course, be subject to the normal consultations.

A map showing the location of these sites, and all of the others proposed for allocation can be found online:

- Gypsies/ Travellers – https://sgcreg19.participatr.io/gypsiesandtravellers
- Travelling Showpeople – https://sgcreg19.participatr.io/travellingshowpeople

Expansion sites

The following sites are proposed for limited expansion:





Site code	GTE01
Address	Green Orchards, Berwick Lane
Parish	Almondsbury CP
Ward	Almondsbury Ward
Proposed use	Gypsy and Traveller site
Capacity – pitches	4 additional pitches

Development considerations	Site location / description The 3 existing authorised pitches are long established. The area proposed for expansion is at the rear of the existing authorised site (the south). It is a relatively flat area of a field before it begins to slope up towards the south. The site is located within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access and connections Access will be through the existing approved site.





Site code	GTE02
Address	The Conifers, Oldbury Lane
Parish	Thornbury
Ward	Thornbury North
Proposed use	Gypsy and Traveller site
Capacity – pitches	5 additional pitches

Development considerations	Site location / description The single existing authorised pitch has been long established. The area proposed for expansion is the field to the rear of the existing authorised site (to the north). Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access will be through the existing site.



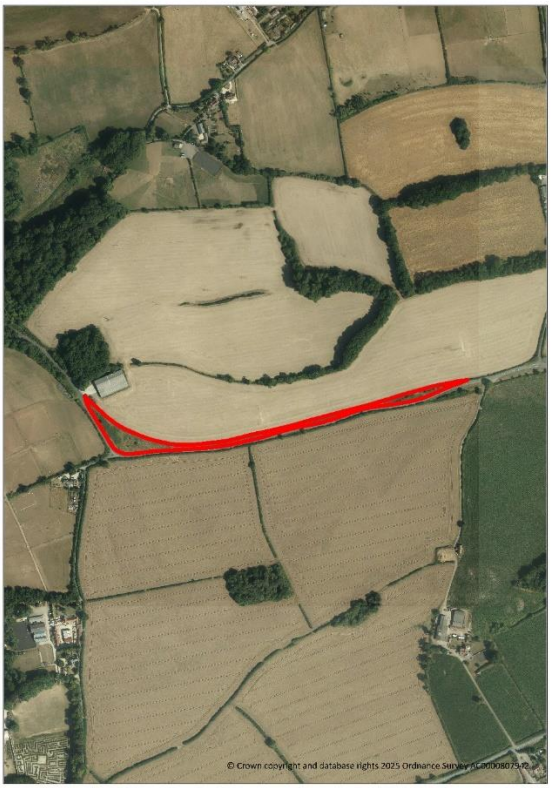


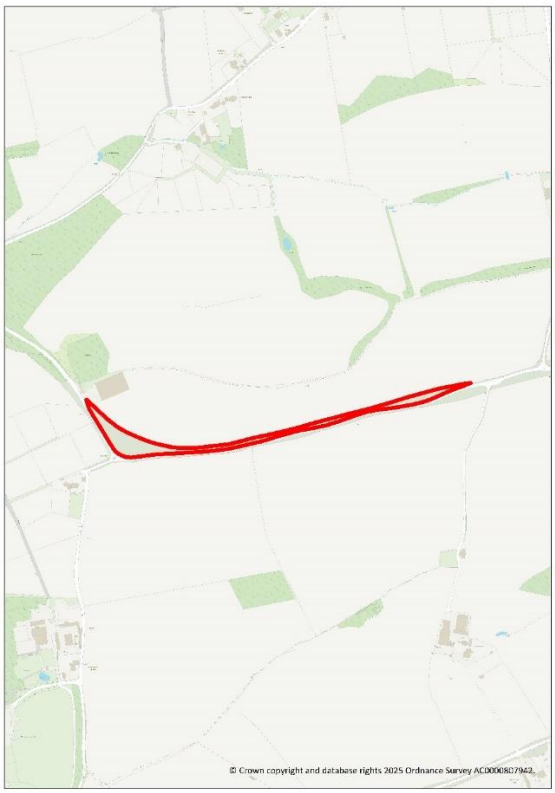
Site code	GTE03
Address	The Meadows, Parkfield
Parish	Pucklechurch
Ward	Boyd Valley
Proposed use	Gypsy and Traveller site
Capacity – pitches	2 additional pitches

Development considerations	Site location / description The 2 existing authorised pitches has been long established. Despite being adjacent to a small sewage works, the officers report for application ref: P19/15337/RVC stated that: The site is not the subject of unacceptable levels of noise disturbance, air pollution, smell, dust or contamination and neither is the site prone to flooding. The area proposed for expansion is a small paddock at the front of the existing authorised site (to the north). The site is located within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access and connections Access will be through the existing site.

New sites to meet Gypsy and Traveller social needs

The following sites are proposed to be allocated to meet social needs:





Site code	GTPU01
Address	Land at the junction of Foxhole Lane and B4461, Elberton
Parish	Aust
Ward	Severn Ward
Proposed use	Gypsy and Traveller site
Capacity – pitches	4 pitches

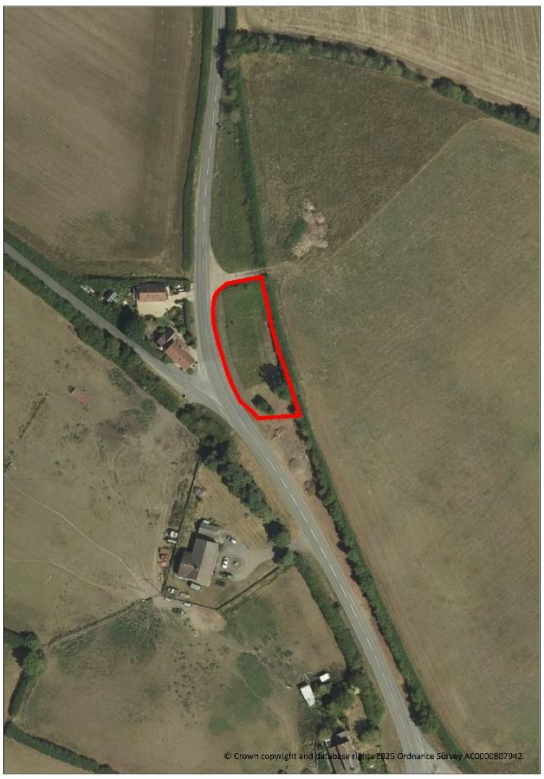
Development considerations	Site location / description The site is a large area of grass with some young trees situated to the west of Alveston. It would be a suitable site for a single extended family group. The site is within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Existing trees should be retained. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the Council.





Site code	GTPU02
Address	Doynton Lane, Doynton
Parish	Doynton
Ward	Boyd Valley
Proposed use	Gypsy and Traveller site
Capacity – pitches	2 pitches

Development considerations	Site location / description The site is front section of a field to the north of Doynton. It would be a suitable site for a single extended family group. The site is within the Cotswold National Landscape. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape The site should be sensitively designed to not significantly harm the Cotswold National Landscape. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council. Flood risk The road in front of the site in Flood Zone 3a. Opportunities for safe egress should explored.





Site code	GTPU03
Address	Froglands Cross, Old Gloucester Road
Parish	Frampton Cotterell
Ward	Frampton Cotterell
Proposed use	Gypsy and Traveller site
Capacity – pitches	3 pitches

Development considerations	Site location / description The site is a large area of grass adjacent to the highway. It would be a suitable site for a single extended family group. The site is within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Existing trees should be retained. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTPU04
Address	Land at Peg Lane, Pucklechurch
Parish	Pucklechurch
Ward	Boyd Valley Ward
Proposed use	Gypsy and Traveller site
Capacity – pitches	8 pitches

Development considerations	Site location / description The site is a portion of a larger field south of the M4 motorway. It is sufficiently distant from the M4 for noise not to be a problem. The site is within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape and Green Belt Development should demonstrate how they will ensure a strong defensible Green Belt boundary. Opportunities for soft landscaping measures should be included in the design. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. A children's play area should be incorporated within the design. Access Access to be determined in consultation with the council.





Site code	GTPU05
Address	Rectory Lane, Cromhall
Parish	Cromhall
Ward	Charfield Ward
Proposed use	Gypsy and Traveller site
Capacity – pitches	8 pitches

Development considerations	Site location / description The site is a portion of a larger field to the south west of Cromhall. There are some existing houses to the north. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. The design should take account of and preferably enhance footpath OCR/20. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. A children's play area should be incorporated within the design. Access Access to be determined in consultation with the council.





Site code	GTPU06
Address	The Firs, Swan Lane
Parish	Winterbourne
Ward	Winterbourne
Map link	
Proposed use	Gypsy and Traveller site
Capacity – pitches	3 pitches

Development considerations	Site location / description The site is a portion of a larger field to the north west of Winterbourne. There is a pylon on the rest of the field that restricts opportunities for residential development. It would however have potential for grazing land for the occupiers of the pitches. The site is in the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape and Green Belt Development should demonstrate how they will ensure a strong defensible Green Belt boundary. Opportunities for soft landscaping measures should be included in the design. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. A children's play area should be incorporated within the design. Access Access to be determined in consultation with the council.





Site code	GTPU07
Address	Tormarton Road, Marshfield
Parish	Marshfield
Ward	Boyd Valley Ward
Proposed use	Gypsy and Traveller site
Capacity – pitches	2 pitches

Development considerations	Site location / description The site is a small overgrown area of land adjacent to Tormarton Road, to the north of Marshfield. It is located within the Cotswold National Landscape. It is located next to existing development. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design to mitigate any impact on the National Landscape. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTPU08
Address	Land adjacent to Northwood Park
Parish	Winterborne
Ward	Winterborne
Proposed use	Gypsy and Traveller site
Capacity – pitches	6 additional pitches

Development considerations	Site location / description The site an existing socially provided site located to north of the M4. The current site has 19 pitches. There are fields around the existing pitches with defensible boundaries. The provision of additional pitches will be realised through a redesign of the site (incorporating land adjacent) to provide for upgraded living accommodation and amenity space for residents. The site is located within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. A children's play area should be incorporated within the design. Access Access to be determined in consultation with the council.

New sites to meet Gypsy and Traveller private need

The following sites are proposed to be allocated to meet private needs:

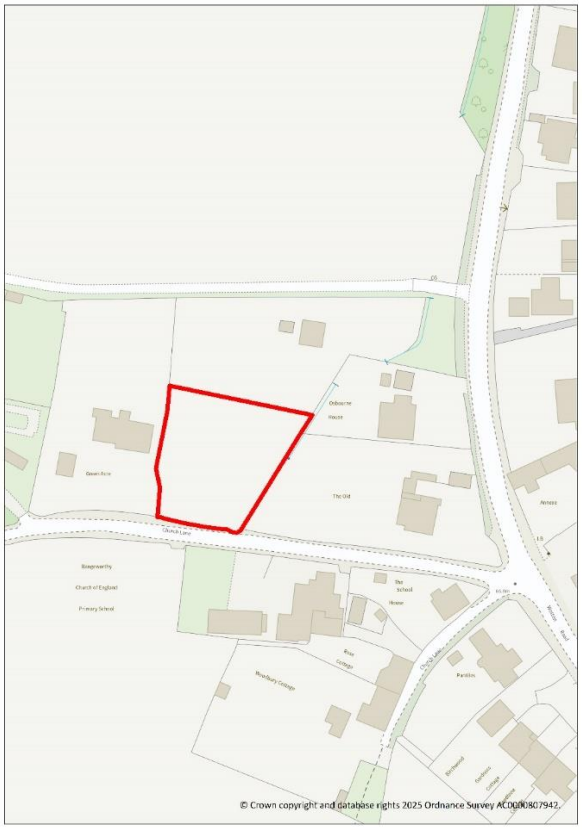




Site code	GTNS01
Address	Land at Beech House, Iron Acton
Parish	Iron Acton
Ward	Frampton Cotterell
Proposed use	Gypsy and Traveller site
Capacity – pitches	1 pitch

Development considerations	Site location / description The site is an existing stables and yard, and as such is previously developed land. The site is located within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Design Development should respect the privacy and amenity of neighbouring residential properties. Development should be restricted to the existing yard area as this has defensible boundaries. The pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTNS02
Address	Land at Church Lane, Rangeworthy
Parish	Rangeworthy
Ward	Ladden Brook
Proposed use	Gypsy and Traveller site
Capacity – pitches	6 pitches

Development considerations	Site location / description The site is a paddock situated between two residential properties within the settlement of Rangeworthy. There is a primary school immediately across the road to the south, and there a number of community facilities within walking distance. The site is circa 130m from Holy Trinity church which is grade 2 listed. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Heritage Any application should be supported by a heritage appraisal to inform the design of the site and mitigate against any impact on Holy Trinity church. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTNS03
Address	Land at Commonmead Lane, Old Sodbury
Parish	Sodbury
Ward	Cotswold Edge
Proposed use	Gypsy and Traveller site
Capacity – pitches	6 pitches

Development considerations	Site location / description The site is a paddock to the north of Badminton which runs between Yate and Old Sodbury. The site is within 250m of 2 grade 2 listed buildings (Spring Grove House and Hartley House), however there is existing development between the site and these buildings the development would impact on the setting. The Frome Valley Walk Way runs for a short section to the south of the site. The site is located within the Cotswold National Landscape. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design, specifically a buffer plantation to the immediate north of the Frome Valley Walkway. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTNS04
Address	Land at Henfield Road
Parish	Pucklechurch
Ward	Boyd Valley
Proposed use	Gypsy and Traveller site
Capacity – pitches	4 pitches

Development considerations	Site location / description The site is a paddock with stables (planning ref: PT10/1776/F), as such it is previously developed land. It is situated to the east of an existing leisure use. The site is within the Green Belt and is predominantly in flood zone 3. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape Opportunities for soft landscaping measures should be included in the design. Flood risk Any application must be accompanied by a flood risk assessment demonstrating how the development can be made safe for its lifetime and not increase flood risk elsewhere. Design Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council.





Site code	GTNS05
Address	Land opposite Green Orchards, Berwick Lane
Parish	Almondsbury
Ward	Almondsbury
Proposed use	Gypsy and Traveller site
Capacity – pitches	4 pitches

Development considerations	Site location / description The site is to the north of the existing Green Orchards site on the other side of Berwick Lane. There are some existing buildings on the site which appear to be agricultural and/or equine in nature. There are power lines over a portion of the site. The northern most part of the site is located within flood zone 2/3. The site is within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape and Green Belt Development should demonstrate how they will ensure a strong defensible Green Belt boundary. Opportunities for soft landscaping measures should be included in the design. Flood risk / powerlines The site layout should seek to avoid areas of flooding whilst taking into consideration the power lines. Any application should be accompanied by a flood risk assessment. Design Development should respect the privacy and amenity of neighbouring residential properties. Each pitch should have a maximum of a mobile home, touring caravan, day room and two parking spaces. Access Access to be determined in consultation with the council

Sites for Travelling Showpeople

The following sites are proposed to be allocated to meet private needs:





Site code	TSP01
Address	Land at Leigh Farm, Pucklechurch
Parish	Pucklechurch
Ward	Boyd Valley Ward
Proposed use	Travelling Showpeople
Capacity – plots	15 plots

Development considerations	Site location / description The site is an area of a field which forms part of the larger is located to the north of the M4 and to the south of Westerleigh Crematorium. An oil pipeline crosses the north east of corner of the site. The site is within the Green Belt. Overarching Policy Compliance It is expected that development would take account of policies drafted in the South Gloucestershire Local Plan as a whole. Landscape and Green Belt Development should demonstrate how it will ensure a strong defensible Green Belt boundary. There should be a substantial buffer plantation on the boundary of the site closest to the Crematorium. Opportunities for soft landscaping measures should be included in the design. Design The design should ensure the necessary easements for the oil pipe line. Noise Any application should be accompanied by evidence to demonstrate how any unacceptable levels of noise from the M4 motorway will be mitigated. Access Access to be determined in consultation with the council.

Appendix C - Sites not taken forward

Name of site	Property services number	Reasons
1 & 2 Willow Rank, Whiteshill, Hambrook	T37007504	Unworkable topography, poor access.
5, 11, 15 & 17 Siston Common (formerly Brook Cottages)	T46004601	Partially open access land, rendering remainder of site unsuitable as a consequence.
A46 Gorse Lane, Cold Ashton - Land at	T07000301	Adjacent to Cotswold way - exposed site landscape impact.
A46 Gorse Lane, Cold Ashton - Land on east side	T20002602	Adjacent to Cotswold way - exposed site landscape impact.
Aust Road (A403), Pilning - Land at	T04003201	Unacceptable noise and air quality issue.
Aust Road (B4461), Olveston - Land at	T22001401 /T22002201	Unworkable topography.
Bristol Road, Cromhall - Land at	T08002001	Inaccessible site.
Cake Pill Gout (fronting B4055), Aust - Land Near	T04000501	Noise and air quality issue.
Castle Farm Road, Hanham. Land on the East side of	T42000601	Existing car park for nature reserve.
Filton Road, Hambrook - Land at	T37008902	Unmitigable noise impact due to proximity and height of M32 motorway.
Foss Lane, Oldbury on Severn - Land at	T21000607	Irregular shape would make development of pitches unfeasible.
Gorse Lane, Dyrham - Land at	T07000502	Exposed site unacceptable impact on the national landscape.
Hicks Common Road, Winterbourne - Land East of	T37004901	Land locked.
Latteridge Road, Iron Acton, Bristol - Land at Court Farm	T18001101	Unacceptable impact on heritage assets.
Morton Street, Newton Road, Morton - Land adjoining	T30000608	Irregular shape of site makes it inaccessible.
Severn Road, Severn Beach - Land at A403,	T24000905	Noise and air quality issues.
Wapley Common, Wapley - Land and cottages at	T09000401	Unacceptable impact on residential amenity.

Name of site	Property services number	Reasons
Severn Road /Moorhouse Lane, Hallen - Land at	T02001801	Land in use by rugby club.
Windsor Crescent, Hallen, Bristol - Land at	T02002101	In use as allotments.
Tan House Farm, Main Road, Aust	T04003502	Poor access.
Poole Farm, Aust, Bristol	T04003503	Pylon in middle of site.
Tanhouse Farm, Common Lane, Aust - Land at	T04003506	Lack of access.
Tan House Farm, Main Road, Aust	T04003507	Lack of access.
Millhill Lane Aust - Land and Buildings at	T04003508	Lack of access.
Frampton End Farm Hovers Lane Frampton Cotterell BS17 2JY	T14004803 /	Various parcels land locked or access issues.
Frampton End Farm Hovers Lane Frampton Cotterell BS17 2JY	T14004806	Various parcels land locked or access issues.
Frampton End Farm Hovers Lane Frampton Cotterell BS17 2JY	T14004807	Various parcels land locked or access issues.
Broad Lane, Yate - Land at	T18003701	Site in active use - unlikely to come forward in plan period - but if it comes available has potential for TSP.
Broad Lane Depot, Broad Lane, Yate	T18003801	Site in active use - unlikely to come forward in plan period - but if it comes available has potential for TSP.
The Home Farm, Hay Street, Marshfield	T20002801	Not suitable in comparison to rest of holding as visually prominent in National Landscape.
Southlands, Tytherington, Wotton-U-Edge - Land at	T33000101	In use as play space and landlocked.
Ram Hill / Broad Lane, Coalpit Heath	T34003601	Unacceptable impact on heritage assets / poor access.
Elm Farm, Westerleigh Road, Yate - Land at	T34003703	Used as an access to adjacent land, next to industrial uses so unsuitable.
Shellards Road, Longwell Green - Land East of	T45015301	Longwell Green Football club site.
Park Farm, Leigh Lane, Westerleigh, Bristol	T25001101	landlocked and next to oil refinery.

Name of site	Property services number	Reasons
Stover Road, Yate (Westerleigh) - Land at rear of	T34000703	Park and ride and attenuation pond.
Bridge Cottage, Stover Road, Yate (Yate Road, Iron Acton)	T18003603	Wooded area on highway verge - steep gradient and inaccessible.
Old Gloucester Road, Winterbourne - Land at	T37000901	Adjacent to another proposed allocation, concern about over development.
St Johns Way, Chipping Sodbury - Land off	T28003601	Undesignated open space.
Council Offices, Castle Street, Thornbury / Castle Court, Thornbury, Bristol	T30001701 / T30001702	Located within a conservation area, topography is challenging, would require footpath relocation and reconfiguration of existing car park - meaning issues with achievability.
Tormarton Depot, A46, Dodington Ash, Tormarton	T31000302/T31000305	Concerns over availability.
Hill Farm, Westerleigh Hill, Westerleigh - Land at	T25001102	Impact on the setting of the crematorium.
Charfield Road, Tortworth - Land at	T32000102	Would impact on informal park and share use.
Northwick Road, Pilning, Bristol - Housing site	T24001301	Next to sewerage plants.
Aust Road, Aust - Land at 1 and 2	T22002203 / T22002203	Significant uncertainty over availability.
Frampton End Farm Hovers Lane Frampton Cotterell BS17 2JY	T14004804	Significant uncertainty over availability.
Holbrook Lane, Wick - Land at East of	T35000901	Potentially unsuitable
Beacon Lane, Winterbourne - Land at	T37000916	Potential Green Belt issue due to the cumulative effect and harm to GB due to other Local Plan allocation set in Reg 19 document.