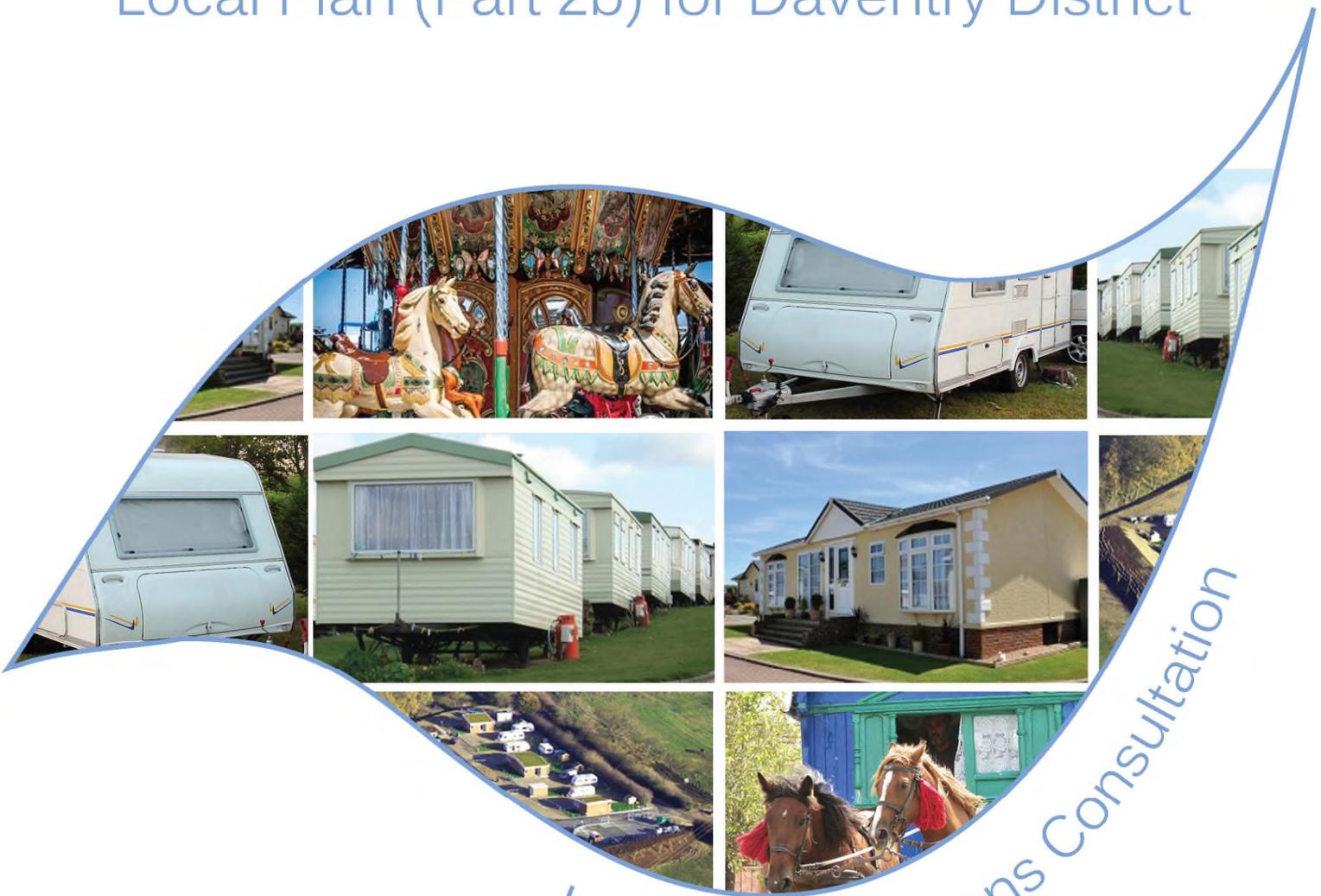




Gypsies, Travellers and Travelling Showpeople Local Plan (Part 2b) for Daventry District



Issues and Options Consultation

Consultation Arrangements

- (i) Title: Gypsies, Travellers and Travelling Showpeople Local Plan (Part 2b)- Issues and Options Consultation
- (ii) Subject Matter:
 - To set out clear policies, standards and criteria for determining applications related to Gypsies, Travellers and Travelling Showpeople including the allocation of land to deliver residential sites to meet identified need, reflecting the requirements set out in policy H6 of the West Northamptonshire Joint Core Strategy.
- (iii) This document is published for public consultation purposes. The consultation period starts on 29th January 2016 and will run for 6 weeks ending at 4.30 pm on Friday 11th March 2016.

Representations can be made:

- Online: www.daventrydc.gov.uk/consultation
- By Post: Local Strategy Service, Daventry District Council, Lodge Road (hard copies of the questionnaire are available from the Local Strategy Service)
- Daventry, Northamptonshire, NN11 4FP
- By e-mail to: planningpolicy@daventrydc.gov.uk

If you are not already on our consultation database you will automatically be added to our consultation database unless you indicate otherwise.

(iv) The consultation will be undertaken in accordance with the Daventry District Council Statement of Community Involvement. This involves:

- A Press Notice and Press Release
- Copies being made available for public viewing at the Council offices, local libraries, and the Council website (www.daventrydc.gov.uk)
- Letters and emails to stakeholders informing them of the document
- A facility enabling the public to respond on-line.
- Information boards and leaflets available at Daventry District Council offices
- A number of public exhibitions which are as follows;
 - 9th February – Woodford Halse Village Hall – 4pm to 7pm
 - 10th February – Welford Village Hall - 4pm to 7pm

- 11th February – Moulton Village Hall – 4pm to 7pm
- 23rd February – Crick (The Old School House) – 4pm to 7pm
- 24th February – Long Buckby Community Centre – 4pm to 7pm

(v) Comments are invited on all aspects of the document

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Daventry District Gypsies Travellers and Travelling Showpeople Allocations Local Plan – Issues and Options Consultation

1. Introduction

- 1.1 Daventry District Council is committed to the preparation of a Local Plan (Part 2b) which seeks to meet the identified accommodation needs of Gypsies, Travellers and Travelling Showpeople. Where collective reference is made to these groups, they are called ‘travelling communities’.
- 1.2 The Council is preparing the Plan in order to ensure that it meets the requirements of Government policy to meet the accommodation needs of travelling communities in Daventry District. This paper seeks your views on the issues and options for the allocation of sites for travelling communities in the District. The consultation will inform the development of a methodology for assessing potential sites for allocation.
- 1.3 This Issues and Options document offers a starting point for discussion on the accommodation needs of travelling communities and the options for the way forward. The paper is seeking the views of all communities within Daventry District, which will help to progress the plan to the next stage. In doing so this consultation also fulfils the requirement of Regulation 18 of the Local Planning Regulations 2012

2. Planning Policy Context

National Planning Policy

2.1 Current national policy is set out in the Government's document *Planning policy for traveller sites*¹ (August 2015). This states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. Local planning authorities should, in producing their local plans:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
- b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years eleven to fifteen;
- c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- e) protect local amenity and environment.

Local Planning Policy

Daventry District Local Plan

2.2 The Daventry District Local Plan was adopted in 1997. Some of the policies were 'saved' by a direction from the Secretary of State in 2007. In December 2014 the West Northamptonshire Joint Core Strategy (WNJCS) was adopted and replaced some of the saved policies, including those related to affordable housing.

2.3 The West Northamptonshire Joint Core Strategy includes Policy H6 which identifies pitch and plot targets up to 2029 in accordance with local evidence of accommodation needs as set out in Section 4 of this Paper. It states the total requirement for accommodation in Daventry District up to 2029 as:

- 20 residential pitches
- 1 emergency stopping place
- 2 Travelling Showpeople plots

¹ CLG, Planning policy for traveller sites, August 2015. Available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

Settlements and Countryside Local Plan (Part 2a)

2.4 The plan will supplement and refine the policies and proposals in the West Northamptonshire Joint Core up to 2029. The plan will cover the entire District and will include policies and proposals to:

- Establish a rural settlement hierarchy to support the retention and provision of local services and facilities
- Support employment and the rural economy
- Protect and enhance the natural, built and historic environment
- Address sustainable development
- Regenerate and improve Daventry Town

Affordable Housing SPD 2012 (to be replaced by Housing SPD)

2.5 The Affordable Housing SPD was adopted in December 2012. It:

- Provides policy guidance to assist applicants in preparing applications, which include housing for planning permission engaging in pre-application advice.
- Sets out the approach to affordable housing including the use of planning agreements and the use of model cascades to determine who has priority for nomination.

It is intended this document will be replaced by a Housing SPD, which would cover all forms of housing in the District and addresses new Government initiatives such as Starter Homes. It also includes guidance on criteria for sites for travelling communities.

3. Existing Site Provision in Daventry District

- 3.1 In 2013, the West Northamptonshire Joint Planning Unit commissioned a Traveller Accommodation Needs Study (TANS). This is discussed further in section 4 of this report.
- 3.2 The study reported 25 pitches exist in Daventry District provided on two authorised private sites, one at Justin Park to the south of Market Harborough (23 pitches) and the other a small private site in Arthingworth which at the time of the report provided 2 pitches.
- 3.3 Since the publication of the TANS a further two pitches have been granted planning permission, in Arthingworth Parish. There are thus currently 27 authorised pitches in Daventry District.

4. Identified Need in Daventry District

- 4.1 An assessment of the accommodation needs for Travellers in the whole of Northamptonshire was undertaken in 2008. The Gypsy and Traveller Accommodation Assessment in Northamptonshire (GTAA) identified a need for 9 residential pitches, 3 transit pitches and 2 travelling Showpeople plots for the period 2007-2017 in Daventry District. The GTAA only identified need up to 2017. It was therefore necessary to update the data to allow further projections to be made.
- 4.2 The West Northamptonshire Joint Planning Unit therefore commissioned the West Northamptonshire Travellers Accommodation Needs Study (TANS). The study primarily covered Daventry District and Northampton Borough as South Northamptonshire District had been covered by a separate study. It showed figures for sites up to 2032/33. However the WNJCS only deals with the period up to 2029.
- 4.3 The TANS considered a range of Gypsy and Traveller groups residing in West Northamptonshire, including English Gypsies, Irish Travellers, New Travellers and Travelling Showpeople. It used primary and secondary data sources including:
- **Secondary information** including a literature review and secondary data analysis;
 - **Stakeholder consultation** with local organisations involved with Gypsies and Travellers; and
 - **Face-to-face surveys** of Gypsies and Travellers.
- 4.4 The study quantified the accommodation and housing related support needs of Gypsies and Travellers in West Northamptonshire for the period 2012/13-2032/33 and provided independent evidence to inform policy development in housing and planning. The key findings of the TANS are summarised below.

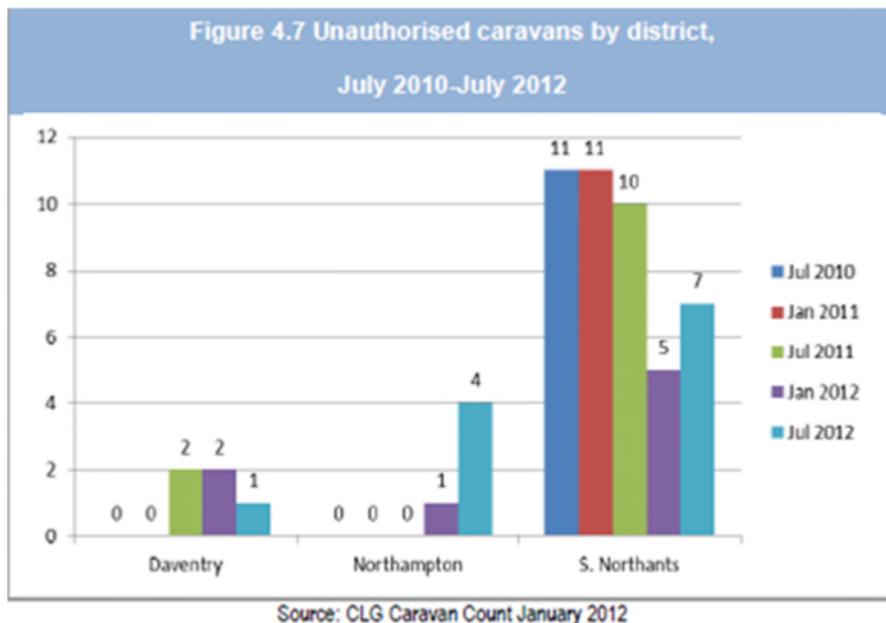
West Northamptonshire Travellers Accommodation Needs Study (TANS) – Key Findings

Population Trends

- 4.5 The TANS reviewed the evidence provided by the national Caravan Count. It stated that:
- While there are deficiencies in the Caravan Count, it remains the only national source of secondary data on caravan levels and is useful for determining trends in the number of Gypsies and Travellers living on sites. This was used in conjunction with locally collected Northamptonshire Countywide Traveller Unit (CTU) data in order to look at Gypsy and Traveller population trends and estimates in West Northamptonshire.*
- 4.6 The TANS also stated that the East Midlands contained one of the smallest numbers of caravans of any English region². However, when the population of the East Midlands is taken into account the density of caravans is 36 per 100,000 settled population, which is only slightly below the English national average of 38 per 100,000 settled population.

4.7 West Northamptonshire’s count is the lowest in the East Midlands region at 29 caravans per 100,000 settled population. Daventry District’s count is 30 caravans per 100,000 settled population but this is still very low compared to some nearby counties such as Cambridgeshire and Buckinghamshire, which have 176 and 125 caravans per 100,000 settled population, respectively.

4.8 There were relatively small numbers of unauthorised caravan days in the West Northamptonshire area during 2010/11-2011/12 as shown in the graph below.



4.9 A large proportion of these unauthorised encampments were due to the movements of a small number of families. These factors combined with evidence derived from stakeholder consultation (see below) suggested a need for emergency stopping places to allow stays of a few days rather than transit sites, which typically are associated with stays of a month or more.

4.10 CTU data showed that there was an increase in the number of unauthorised caravan days rising from 525 during 2010/11 to 660 in 2011/12. However, over half of all unauthorised caravan days in West Northamptonshire during the period April 2012 to October 2012 were due to the movements of three families.

Stakeholder Consultation

4.11 A stakeholder session was conducted in October 2012 with County and District/Borough Council Officers, including neighbouring authorities, involved with Gypsy and Traveller issues. In terms of new accommodation for Gypsy and Traveller families, it is apparent that there is a preference for small, privately owned sites of between four and five pitches. There was general agreement that there was no requirement for the provision of new transit sites. It was, however, suggested that there may be a need for emergency (also known as temporary) stopping places.

- 4.12 Although the preferred accommodation type for many Gypsy and Traveller families may be small sites located on land owned by themselves, the focus group acknowledged difficulties in Gypsies and Travellers either buying or developing land for new accommodation. Alternatives were suggested such as local authorities selling or leasing land to families or encouraging Registered Providers (RPs) to play a greater role in providing or managing sites.
- 4.13 The stakeholders emphasised the health and education needs of Gypsy and Traveller families. It was apparent that the nomadic lifestyle of Gypsies and Travellers, especially during summer months, can adversely impact on children's educational attainment. It was also apparent that recent budget cuts had affected educational support services. Nonetheless, there was evidence that the relationship between local schools and Gypsy and Traveller families has improved in recent years.

Accommodation need

- 4.14 Accommodation need was assessed for the TANS using a model in accordance with Practice Guidance issued by the Department of Communities and Local Government (CLG). It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group of Gypsies, Travellers and Travelling Showpeople, based on secondary data.
- 4.15 The total requirement for accommodation in Daventry District up to 2029 was thus identified as:
- 20 residential pitches (since the TANS was published a further two pitches in Arthingworth have been granted planning permission, reducing the total additional pitches required to 18 pitches).
 - 1 emergency stopping place.
 - 2 Travelling Showpeople plots.

TANS Conclusions

- 4.16 As well as quantifying accommodation need, the TANS also made recommendations on key issues. The main ones are as follows:
- According to the survey undertaken with Gypsies and Travellers in Daventry District and Northampton Borough the preferred size for permanent/residential sites was 4-6 pitches, which tend to have fewer inter-family tensions and are therefore easier to manage. The stakeholder meeting undertaken as part of the TANS confirmed that smaller sites were preferred.
 - Survey results suggested that a mix of public and private sites would be required. Specific sites available should be outlined in future local plans and guidance offered on the type of land that is likely to obtain planning permission as well as land that is unlikely to. Specific advice on the planning process should also be offered to members of the travelling communities.

- Such an approach would also assist Travelling Showpeople, for whom the shortage of accommodation is derived from difficulties obtaining planning permission for new land or extensions of existing yards.
- The TANS needs calculations suggested a requirement for emergency stopping places in West Northamptonshire to further reduce the number of unauthorised encampments.
- Findings from the survey and stakeholder consultation suggested that whilst it is acknowledged that there are examples of good practice in relation to the Gypsy and Traveller community and local schools, there needed to be further consideration of how educational needs can be met. For example, the abolition of the County Council Gypsy and Traveller Liaison Officer post and the potential closure of Braybrooke Primary School (which has now occurred) meant that the educational needs of the Gypsy and Traveller community might not be met.
- The conditions of local authority sites should be regularly monitored to ensure that maintenance issues are swiftly resolved. However, the combination of different issues impacting negatively on Ecton Lane, Northampton suggested that it might be necessary to consider its future as a permanent residential site.
- Local housing authorities should include Gypsy and Irish Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing. In addition, there needed to be better sharing of information between agencies, which deal with the Gypsy and Traveller communities.
- Information should be made available in a variety of forms (as well as visits by liaison and support officers) to ensure that the Gypsy and Traveller communities are aware of the types of help and support available to them.
- Regular training and workshop sessions with local authority and service provider employees (and elected Members) would help them further understand the key issues facing the Gypsy and Traveller community.
- The population size and demographics of Gypsies and Travellers can change rapidly. As such, their accommodation needs should be reviewed every three to five years.

Recent CTU Data

- 4.17 More recent data from the CTU shows that from April 2015 until September 2015 there were six unauthorised encampments and 173 caravan days within Daventry District.

Future Work

- 4.18 It is acknowledged that the field work undertaken to support the existing needs studies is now around three years old and by the time the Part 2b Local Plan reaches its formal stages, such as examination, it could be argued that the needs evidence would be out of date.
- 4.19 The evidence base relating to the accommodation needs of Gypsies, Travellers and Travelling Showpeople therefore needs to be updated. The proposed timetable is given below. If possible, this work will be conducted jointly for Daventry District, Northampton Borough and South Northamptonshire District.

Appointment:	January 2016
Draft Study submission:	April 2016
Final Study submission:	May 2016
Officer / Member seminar:	May 2016

5. Why is a Local Plan Needed?

- 5.1 National Planning Policy requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople. As discussed in previous sections, this need was evidenced and presented by the West Northamptonshire Travellers Accommodation Needs Study (TANS), and will be updated in a further study.
- 5.2 Local Plans are expected to identify a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. Furthermore Plans should identify specific, developable sites or broad locations for growth for years six to ten and, where possible, for years eleven to fifteen.
- 5.3 Having established the need for Gypsy, Traveller and Travelling Showpeople accommodation in the area, pitch and plot targets to meet this need have been included in Policy H6 of the Joint Core Strategy. The preparation of a Local Plan (Part 2b) is required to address the accommodation need in accordance with national policy.
- 5.4 Preparing a Local Plan which allocates sufficient land to meet accommodation needs is likely to have a number of positive legal, social and financial impacts as summarised below:
- **Legal impacts:** In addition to meeting the requirements of national planning policy, the preparation of the Local Plan should assist the council in meeting the Public Sector Equality Duty to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different groups in the course of developing policies and delivering services. Gypsies and Travellers are recognised as distinct ethnic groups and are thus covered by the Duty and protected from discrimination by the Equality Act 2010. Furthermore the Local Plan will assist the partner Councils in meeting their duties under the Housing Act 2004, which include assessing the accommodation needs of travelling communities and preparing a strategy to meet those needs.
 - **Social impacts:** Identifying sufficient suitable sites is likely to have positive social outcomes for both the travelling and settled communities. For travelling communities providing additional sites will reduce the level of homelessness and provide better access to services such as health and education. As noted in the TANS, existing research indicates that the health and education outcomes for the travelling community are poor in comparison to the general population. Providing sufficient sites is also seen as the most effective way of dealing with unauthorised encampments, which will in turn reduce the conflict which such sites can cause with the settled community.
 - **Financial impacts:** Dealing with unauthorised encampments, planning appeals and potential court cases arising from enforcement action can be very expensive for local authorities. The preparation of a Local Plan which identifies appropriate sites should reduce the incidence of unauthorised encampments and increase the ability to take effective enforcement action against any unauthorised developments which do occur. Furthermore by demonstrating a five year land supply the Council will have greater control over decision making. For example, it will be able to refuse

planning applications on sites which are not suitable or sustainable and have a much greater chance of defending these decisions at appeals.

- 5.5 Failure to prepare a Local Plan and to provide sites would inevitably lead to a range of negative legal, social, and financial impacts for the Council and the communities it serves.

6. Issues

6.1 The following paragraphs set out a number of issues which represent a starting point for discussion. We are seeking your response to the questions that are raised in respect of each of the issues, together with your views on any further issues you think should be considered.

Type of Site

6.2 Gypsy, Traveller and Travelling Showpeople sites are usually provided as:

- **Permanent (residential) sites** – providing residents with a permanent home.
- **Transit sites** – permanent sites used to provide only temporary accommodation for their residents. Lengths of stay are usually set at between 28 days and three months.
- **Emergency (temporary) stopping places** – pieces of land in use as authorised short-term (less than 28 days) stopping places.
- **Travelling Showpeople plots** – The plot contains living areas as well as somewhere to store maintain and repair equipment. These can also be known as Winter Quarters

Site Allocation

6.3 As stated above, based on the TANS Daventry District has a need to provide 18 residential pitches. This number may change depending on the work now being commissioned. The Part 2b Local Plan could seek to allocate for the entire requirement or it could allocate a proportion of the requirement and enable the residual requirement to come through the development management process, that is, planning applications. This would allow flexibility during the plan period as the most appropriate locations for the provision could change.

Issue 1 – Site Allocation

There is a need to provide residential pitches within Daventry District by 2029. Should all 18 pitches be allocated within the Part 2b Local Plan or should some be allowed to come through normal development management processes, that is planning applications?

Option 1

All pitches should be allocated within the Local Plan Part 2b

Option 2

A proportion of the requirement is allocated and the remaining pitches come through development management processes. If this should be the approach, how many pitches should be allocated in the Local Plan?

- 6.4 If you are a willing landowner who wishes to put forward a site for consideration for development of a Gypsy and Traveller site, please complete a call for sites form available from {HYPERLINK}. As part of the submission please outline how your site could provide access to the community services and facilities (e.g. local shops, GP surgery, schools)

Policy H6 Site Criteria

- 6.5 Policy H6 also sets out the following criteria to inform the allocation of sites, as follows:
- *The site has safe and convenient vehicular access from the public highway, and provides adequate space for parking, turning and servicing on site.*
 - *The site is reasonably accessible to a range of services set out in national policy, i.e. shops, public transport, primary health care and schools.*
 - *The site will provide an acceptable standard of amenity for the proposed residents. Sites which are exposed to high levels of flood risk and noise and air pollution are not acceptable.*
 - *The site will be capable of providing adequate on site services for water supply, power, drainage, sewage disposal, waste disposal, composting and recycling facilities.*
 - *The scale and location of the site will not have an unacceptable impact on the landscape, local infrastructure and existing communities.*
 - *In the case of sites for Travelling Showpeople there will be sufficient space for the storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers. Additional screening may be required having regard to the nature of the equipment that is being stored.*
- 6.6 In 2009 the Council adopted Design Criteria for Gypsy and Travellers sites. These have been included in the current consultation on the Housing SPD. It is intended to incorporate those criteria into the Part 2b Local Plan

Issue 2 – Policy H6 Site Criteria

Policy H6 of the West Northants Joint Core Strategy sets out criteria to be taken into account when making site allocations and determining planning applications for Gypsy, Traveller and Travelling Showpeople provision. Further guidance is provided in the Site Design Criteria contained in the draft Housing SPD; it is intended to incorporate those criteria into the Part 2b Local Plan. It is not considered necessary for the Local Plan Part 2b to include anything further regarding the criteria.

Do you agree? If not, what should be included in the Local Plan?

Site size and location

- 6.7 Policy H6 does not seek to set a specific limit on the size of individual sites, which is consistent with Policy B of 'Planning policy for traveller sites' which states that planning authorities should:

Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density

- 6.8 Evidence gathered through the TANS report suggests that new permanent accommodation should be limited to 'family-sized' sites for around 5 pitches.
- 6.9 The existing site at Justin Park in Daventry District is relatively large with 23 pitches. The survey of residents on this site indicated fairly high satisfaction rates for the site, but there are also a number of concerns about the site which were raised in the survey. At Justin Park residents expressed concern about the lack of facilities, dangerous and noisy traffic, and the belief that important services such as the police or fire brigade are reluctant to attend the site.
- 6.10 The TANS indicates that there may be scope for expanding existing sites to meet some of the need, but notes that there is a clear preference for smaller sites, which tend to be easier to manage.

Issue 3 – Site Size – Gypsy and Traveller

There is a need to provide 18 residential pitches within Daventry District to 2029. What site sizes should be considered for this provision?

Option 1

Sites should be provided for 4-6 Pitches

Option 2

Sites should be provided in a range of sizes up to 15 pitches

Option 3

Other. Please give reasons for your answer.

Issue 4 – Site location – Gypsy and Traveller

Should existing sites within Daventry District be extended to accommodate the identified need or should need be accommodated on new sites?

Option 1

Expand existing sites to accommodate need

Option 2

Identify additional sites

Option 3

Other. Please give reasons for your answer.

- 6.11 If you are a willing landowner in control of a site that you may consider suitable for gypsy and traveller sites please complete a Call for Sites form which can be found at {HYPERLINK}

Site Tenure

- 6.12 The survey of Gypsies and Travellers undertaken in the TANS indicates that most respondents would like to buy their own land on which to live, but relatively few felt that they would be able to afford to buy land in West Northamptonshire. It may be necessary

therefore to consider different forms of tenure to meet the accommodation needs which have been identified. The forms of tenure that could be considered include:

- Privately owned for owner-occupation by a single or extended family
- Privately owned and managed (perhaps by Gypsies and Travellers) to be rented by other Gypsies and Travellers
- Owned and managed by a Registered Provider (Housing Association) or local authority.

Issue 5 – Site Tenure
What tenure should be considered
Option 1 Owned by individuals for occupation by a single or extended family
Option 2 Privately rented – perhaps owned and managed by people from Gypsy and Traveller communities
Option 3 Managed by a Registered Provider or local authority
Option 4 Other – please outline

Emergency Stopping Places

- 6.13 As stated in the Population Trends section above, the TANS report suggests that the needs of the area would be best served by the provision of emergency stopping places rather than transit sites.
- 6.14 Policy H6 of the West Northants Joint Core Strategy sets out a requirement for a single emergency stopping place in Daventry District. However the TANS report does not give any indication of the scale of this provision (number of pitches). This needs to be explored as part of this Issues & Options Paper in order that appropriate provision can be made in the next stage of this plan.

Issue 6 – Emergency Stopping Places
Policy H6 of the West Northants Joint Core Strategy sets out a requirement for a single emergency stopping place within the District. How large should it be?
Option 1 The Emergency stopping place should contain 1-4 pitches
Option 2 The Emergency stopping place should contain 5-8 pitches
Option 3 Other. Please give an alternative option

Mixed Planning Use Sites

- 6.15 Policy F of the Planning for Traveller Sites document sets out the Government’s approach to mixed use sites for travelling communities. Paragraph 16 sets out that:

'Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practicable'.

- 6.16 As part of the site assessment exercise, mixed use schemes will be considered in line with Policy F to ensure that as many potential sites as possible are considered, regardless of their size, to demonstrate that all reasonable options have been investigated.
- 6.17 Given this national guidance will be applied specifically locally through Plan allocations, it is arguable that further policy guidance is not needed on this matter within the Plan. However, this needs to be explored as part of this consultation.

Issue 7 – Mixed Planning use Traveller Sites

It is not considered necessary for the Local Plan Part 2b to include an additional policy on mixed use traveller sites. Do you agree?

Travelling Showpeople

- 6.18 In addition to the needs of Gypsies and Travellers, Policy H6 of the WNJCS also considers the accommodation needs of Travelling Showpeople in line with the TANS evidence base. It should be noted that the specific site requirements of Travelling Showpeople are somewhat different in that the sites are usually mixed. In addition to residential accommodation, on site facilities are usually required for the storage and repair of equipment.
- 6.19 The TANS reports states:
- Daventry District contains 1 yard consisting of 6 plots whilst South Northamptonshire contains 1 yard containing 2 plots. Daventry District also contains a separate equipment depot which although does not officially contain any plots is occupied by two Travelling Showpeople families.*
- 6.20 The TANS suggested that there was a need for two further Travelling Showpeople plots in Daventry District. The Council needs to consider how best these should be provided.

Issue 8 – Site location – Travelling Showpeople

Should existing sites within Daventry District be extended to accommodate the identified need of Travelling Showpeople or should need be accommodated on new sites?

Option 1

Expand existing sites to accommodate need

Option 2

Identify additional sites. If so, should these sites be identified in close proximity to Woodford Halse?

Option 3

Other. Please give reasons for your answer.

Sites in rural areas and the countryside

- 6.21 Policy C of the Planning for Traveller Sites document sets out the Government's approach to the assessment of sites in rural areas and the countryside:

'When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community'.

- 6.22 If there are suitable sites identified within the rural areas and the countryside, then the proposed site assessment process would follow these guidelines.

Issue 9 – Rural Areas and the Countryside

It is proposed to following national Policy C when allocating sites in the Part 2b Local Plan and include a development management policy which embeds the principle for dealing with any other sites which may need to be considered. Do you agree?

Rural Exception Sites

- 6.23 Policy D of the Planning for Traveller Sites document sets out the Government's approach to rural exception sites.

'If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites, in small rural communities, that would not normally be used for traveller sites. Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed inclusive communities.

- 6.24 Rural exception sites will only be considered for affordable traveller sites in perpetuity. In general, a rural exception policy should also seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

- 6.25 The Local Plan could include a policy relating to rural exception sites along the lines of the existing Policy H3 in the Joint Core Strategy. However, this is not considered necessary as it is planned to address the need via this Part 2b Local Plan.

Issue 10 – Rural Exception Sites

It is not considered necessary for the Local Plan Part 2b to include a specific policy on Rural Exception Sites. Do you agree?

Major development sites

- 6.26 Policy G of the Planning for Traveller Sites document sets out the government's approach to major development projects. The guidance sets out that

'Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for the relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site'.

- 6.27 None of the Sustainable Urban Extensions (SUEs) in the WNJCS will affect existing sites for travelling communities. However, if a major development proposal did affect a site, this is the approach that would be taken.
- 6.28 Policy H6 states that the provision of small sites that are integral to and planned alongside the Sustainable Urban Extensions will be considered where they meet the site allocation criteria in the policy. In preparing masterplans for the development of the SUEs developers could give consideration to accommodating an appropriate site for accommodation for travelling communities. This would be in line with Policy H1 of the West Northants Joint Core Strategy by providing for a mix of house types, sizes and tenures to cater for different accommodation needs including the needs of older people and vulnerable groups.

Issue 11 – Major Development Sites

What additional policy(ies) should this plan contain to bring forward the provision of Gypsy and Traveller sites on major development sites including housing?

Option 1

Developers should provide a proportion of Gypsy and Traveller sites on major developments including housing within the District.

Issue 1a What scale of development should trigger this requirement? 250 houses?

Issue 1b In what circumstances should Gypsy and Traveller pitches count towards the affordable housing provision on such sites?

Option 2

Developers should provide commuted sums where provision for Gypsy and Traveller pitches cannot be made on a major development site.

Option 3

Other

Duty to Cooperate and Other Issues

- 6.29 The Council has a duty to cooperate, including with neighbouring councils, in planning for its area. This can include sharing evidence and meeting need from another area which cannot accommodate all of its own need.

Issue 12 – Duty to Cooperate

Are there any issues arising under the duty to cooperate and that have not already been addressed that the Gypsies Travellers and Travelling Showpeople Local Plan (Part 2b) should consider? In particular:

- **Are there discussions needed with any person or organisation?**
- **Is there need that should be addressed and that is not capable of being met in another area?**

6.30 Issues relating to the provision of accommodation for Travellers in Daventry District and which should be addressed by the Local Plan Part 2b, have been addressed above. We would however like to know whether you think we have identified the right issues and also whether there are any other issues which should be considered.

Issue 13 – Other issues

Are there any other issues the Gypsies Travellers and Travelling Showpeople Local Plan (Part 2b) should consider?

7 What Happens Next?

- 7.1 This Issues and Options Consultation marks the start of the process that will lead to the adoption of a Local Plan which will allocate specific sites and include policies to provide accommodation for Gypsies, Travellers and Travelling Showpeople. At the end of the consultation period Daventry District Council will produce a Consultation and Engagement Report for consideration by the Council’s Strategy Group. This report will include a summary of all the comments that have been received, response to the issues raised through the consultation and details of how these issues would be addressed in the pre-submission version of the plan.
- 7.2 The next stage in the preparation of the Plan will be the identification and assessment of potential sites and drafting of policies. The key stages in the preparation of the Plan are summarised in the table below.

Key Stages		
1	Commencement of preparation including evidence gathering and initial Sustainability Appraisal work	October 2015
2	Consultation on Issues and Options including Regulation 18	January 2016
3	Consultation on draft document	December 2016
4	Proposed Submission consultation	August 2017
5	Submission to Secretary of State	March 2018
6	Commencement of the examination	April 2018
7	Adoption	October 2018

Sustainability Appraisal

- 7.3 Government guidance is that local plans should be accompanied and informed by a Sustainability Appraisal (SA). This allows the potential environmental, economic and social impacts of the local plan to be systematically taken into account and therefore has a key role throughout the plan making process.
- 7.4 SA plays an important part in demonstrating that the local plan delivers sustainable development and has considered reasonable alternatives. Normally, an SA will incorporate a Strategic Environmental Assessment (SEA) to meet the requirements of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the “SEA Directive”). However, in this case it is considered the Plan is

only one which would “determines the use of a small area at local level”³ and also does not set “the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC”⁴ (schemes which require environmental impact assessment) or is likely to require an assessment under the Habitats Directive⁵ and thus the requirement to conduct SEA does not apply.

7.5 It is therefore proposed to conduct a Sustainability Appraisal of the Plan on a light touch basis. This is consistent with Government guidance which states that “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.” A Sustainability Appraisal of this document is currently being prepared and will be consulted on separately. The District Council will notify all consultees on its database and any respondents to this consultation when it is available.

Issue 14 – Strategic Environmental Assessment

It is considered that the Plan does not trigger a legal requirement for Strategic Environmental Assessment. Do you agree?

Issue 15 – Sustainability Appraisal

It is proposed to conduct a light touch Sustainability Appraisal of the Plan. Do you agree?

³ Regulation 5(6)(a) of The Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ Regulation 5(2)(a) of the The Environmental Assessment of Plans and Programmes Regulations 2004.

⁵ Regulation 5(3) of the The Environmental Assessment of Plans and Programmes Regulations 2004.

Glossary

Emergency stopping places

These are also called temporary stopping places. These are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

Gypsies and Travellers

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, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such

Permanent Sites

These are also called Residential Sites. The sites are used as long-term residences and have no maximum period of stay.

Pitch

A pitch is the space required to accommodate a household however one household does not necessarily mean one Caravan due to extended families. Usually a pitch will have space for a mobile home and touring caravan, space for parking and an amenity block.

Plot

This is usually a 'pitch' but on a Travelling Showpeople site. The plot will also have to incorporate space for equipment.

Site

An area of land laid out and used for Gypsy and Traveller caravans, which can be authorised (have planning permission) or unauthorised. They can be self-owned by a Gypsy and Traveller resident, or rented from a private or social landlord.

Transit site/pitch

As per Permanent sites but used to provide temporary accommodation. Lengths of stay are usually set at between 28 days and three months

Travelling communities

Gypsies, Travellers and Travelling Showpeople collectively.

Travelling Showpeople

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