

Rugby Borough Gypsy and Travellers
Site Allocations Development Plan Document
Issues & Options Consultation
and
Call for Sites

September 2022



Contents

1. Introduction	2
DPD preparation timetable	3
Responding to the consultation	4
2. The National and Local Policy Context	5
Legal and National Policy	5
The Equality Act 2010	5
The Housing Act 2004	5
Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended	6
National Planning Policy Framework (July 2021)	6
Planning Policy for Traveller Sites (August 2015)	6
Local Policy - Rugby Borough Local Plan 2011-2031 (June 2019)	8
3. Gypsy and Traveller Accommodation Need in Rugby Borough	10
Introduction	10
Permanent accommodation requirements in Rugby Borough	10
Temporary accommodation requirements in Rugby Borough	12
4. The Location of Gypsy and Traveller Pitches	13
Permanent Residential Pitches	16
Transit Pitches	16
Travelling Showpeople Plots	17
5. The Size and Design of Gypsy and Traveller Sites	18
Size of Sites	18
Site Design Standards	18
6. Site Assessment Criteria for Gypsy and Traveller Sites	22
7. Sustainability Appraisal of the Issues and Options	24
8. Any other issues?	25

1. Introduction

- 1.1. The Government is committed to ensuring 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.
- 1.2. There is a shortage of authorised sites at a national, regional and local level and as a consequence many Travellers live on unauthorised and/or unsuitable sites. If suitable sites can be identified through the planning process it will prevent the need for illegal encampments, which often causes conflict with the settled community.
- 1.3. Rugby Borough Council is preparing a new plan, known as a Development Plan Document or DPD. The DPD will set out site specific policies to meet the Gypsy and Traveller accommodation needs contained in Policy DS2 of the Rugby Borough Local Plan 2011-2031 (adopted June 2019), as updated by the latest Gypsy and Traveller Accommodation Assessment for Rugby Borough.
- 1.4. Rugby Borough Council approved the publication of this Issues and Options consultation document and the publication of the accompanying Issues and Options Sustainability Appraisal for six weeks public consultation. The Cabinet also approved a Call for Sites exercise to be held at the same time.
- 1.5. This is the first formal stage in the plan-making process. The purpose of this consultation is to inform statutory consultees, the public and relevant organisations of the Council's intention to produce a DPD and to seek feedback on what it should contain. The Council is seeking your views on the issues and options identified in this Issues and Options document to meet existing and any future need for Gypsy and Traveller accommodation. Your response will inform the approach to developing the DPD and its content.
- 1.6. It is a legal requirement for the DPD to be subject to a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). These two requirements will be addressed through a joint SA/SEA process for this DPD with the SA incorporating the SEA requirements. A Sustainability Appraisal of the issues and options in this Issue and Options consultation document has been undertaken and the Council is seeking your views on the appraisal. See Chapter 7 in this document for more information about the SA process.
- 1.7. In addition, the Council is formally inviting the submission of potential sites and supporting information as part of a 'Call for sites' exercise to meet the needs of the Gypsy and Traveller community. If you wish to promote a site to be developed for Gypsies and Travellers or Travelling Showpeople accommodation the Council would like to hear from you. At this stage the Council are interested in all site options, please use the 'Call for sites' form to submit the site to the Council for consideration and attach a map to the form

showing the location and boundaries of the land in question. Further information is set out on the Site Submission Form.

DPD preparation timetable

- 1.8. In May 2022 the Government’s Levelling Up and Regeneration Bill was published which sets out proposed changes to reform the planning system including changes to the preparation process and content of development plan documents. Given these proposed changes, the timetable for the preparation of this DPD may be subject to change. In addition, the timing of the Public Examination and subsequent stages, i.e. the Inspector’s Report and date of the adoption of the DPD, may be subject to change as they are dependent on the Planning Inspectorate.
- 1.9. The timetable for the preparation of the DPD is outlined in the Council’s Local Development Scheme June 2022. It is summarised in Figure 1 below as follows:

Figure 1: Rugby Borough Gypsy and Travellers Site Allocations Development Plan Document Timetable

Issues and Options public consultation	October-November 2022
Preferred Options preparation and assessment/ Sustainability Appraisal	January – May 2023
Preferred Options public consultation	June – July 2023
Pre-Submission DPD preparation/ Sustainability Appraisal	August – September 2023
Pre-Submission DPD public consultation	October – November 2023
Submission of the DPD to the Secretary of State for public examination by an independent Planning Inspector	February 2024
Public Examination	June 2024
Inspector’s Report	August 2024
Adoption of the DPD by the Council	September 2024

- 1.10. The next stage in the process will be for the Council to consider all the responses received to the Issues and Options consultation document and the Issues and Options Sustainability Appraisal.
- 1.11. Sites that are identified as potential site allocations will be assessed and will be subject to sustainability appraisal along with emerging policies. The conclusions of this stage will be presented in the Preferred Options document and accompanying Sustainability Appraisal which will be subject to six weeks public consultation. The Preferred Options consultation will inform the preparation of the Pre-Submission DPD which will identify the final proposed allocations and policies. The Pre-Submission DPD will be subject to public consultation before Submission to the Secretary of State for independent Public Examination.
- 1.12. If it is not possible to identify enough sites that are acceptable in planning terms to meet the Gypsy and Traveller accommodation need then there is a risk that the DPD preparation timetable will be delayed to consider alternative approaches and ultimately the Council might be unable to proceed with the preparation of the DPD.

Responding to the consultation

- 1.13. Responses to this consultation must be received by no later than **5pm on Friday 18th November 2022**. This is also the deadline for the submission of sites to the Call for Sites exercise.
- 1.14. Responses can either be submitted by email to: localplan@rugby.gov.uk with 'G&T Issues & Options Consultation' or 'G&T Call for sites' in the subject, or by post to:
- 'G&T Issues & Options Consultation' or 'G&T Call for sites'
Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby CV21 2RR
- 1.15. If you submit a response by email it is not necessary for you to submit an extra copy by post.

2. The National and Local Policy Context

Legal and National Policy

2.1. The Rugby Borough Gypsy and Traveller Site Allocations DPD will be examined by an independent Planning Inspector appointed by the Secretary of State to assess whether it has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are 'sound' if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.¹

2.2. To meet the tests of soundness and the legal and procedural requirements the preparation and content of the DPD is required to comply with the following legislation and national policy:

- Equality Act 2010;
- Housing Act 1985 as amended;
- Planning and Compulsory Purchase Act 2004 as amended and the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended;
- National Planning Policy Framework 2021; and
- Planning Policy for Travellers 2015.

The Equality Act 2010

2.3. Romany Gypsies and Irish Travellers constitute separate ethnic groups protected as minorities under the Equality Act 2010 engaging the Public Sector Equality Duty under section 149. There is therefore a statutory duty on public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the course of developing policies and delivering services.

The Housing Act 1985 as amended

2.4. The Housing Act 1985 was amended by the Housing and Planning Act 2016 to require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.

¹ The tests of soundness are set out in Paragraph 35 of the National Planning Policy Framework, 2021 – <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Planning and Compulsory Purchase Act 2004 as amended and the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended

- 2.5. The DPD will be prepared in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 as amended and the Town and Country Planning (Local Development) (England) Regulations 2012 as amended which sets out the form, content and preparation process for local plans (including DPDs).
- 2.6. Once adopted the DPD will form part of the Development Plan for Rugby Borough, alongside the adopted Rugby Borough Local Plan 2011-2031, any made Neighbourhood Plans and the adopted Warwickshire Minerals and Waste Local Plans.

National Planning Policy Framework (July 2021)

- 2.7. The National Planning Policy Framework (NPPF, 2021)² sets out the Government's planning policy on a range of matters. The NPPF emphasizes that local planning authorities should assess the need for housing (including the needs of Gypsies, Travellers and Travelling Showpeople) and this should be reflected in planning policies.

Planning Policy for Traveller Sites (August 2015)

- 2.8. The Government's 'Planning Policy for Traveller Sites' (PPTS, 2015)³ sets out the Government's planning policy for Traveller sites. It states that the overarching aim of government is to '*ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.*' (Paragraph 3).
- 2.9. In producing local plans, local planning authorities should:
 - Use a robust evidence base to establish accommodation needs;
 - Set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople to address the likely permanent and transit site accommodation needs of Travellers in their area;
 - Identify and update annually a supply of specific deliverable sites to provide 5 years' worth of sites against their locally set targets;
 - Identify a supply of specific developable sites or broad locations for growth for years 6 to 10 and, where possible, for years 11-15;

² National Planning Policy Framework 2021 – <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ Planning Policy for Traveller Sites 2015 – <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

- 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;
- Protect local amenity and environment; and
- Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward. (Paragraphs 7, 9, 10 and 11).

2.10. The PPTS also states that '*local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally*' (Paragraph 13) by ensuring that policies:

- Promote peaceful and integrated co-existence between the site and the local community.
- Promote access to appropriate health services.
- Ensure that children can attend school on a regular basis.
- Provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment.
- Provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development.
- Avoid placing undue pressure on local infrastructure and services.
- Do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.
- Reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

2.11. Paragraph 14 of the PPTS states that 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.

2.12. Temporary or permanent Traveller sites in the Green Belt are classed as inappropriate development which is harmful to the Green Belt and should not be approved, except in very special circumstances. The PPTS does however allow the local planning authority 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. This should only be done through the plan-making 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. (Paragraphs 16 and 17).

2.13. Paragraph 18 of the PPTS states that local planning authorities should consider, wherever possible, including Traveller sites suitable for mixed

residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. 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 practical.

2.14. Paragraph 19 of the PPTS states that local planning authorities should have regard to the need that Travelling Showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment.

2.15. Annex 1 of the PPTS⁴ sets out for the definitions of Gypsies and Travellers and Travelling Showpeople for the purposes of the planning system. Annex 1 is included as Appendix 1 of this Issues and Options document.

Local Policy - Rugby Borough Local Plan 2011-2031 (June 2019)

2.16. The Rugby Borough Local Plan 2011-2031⁵ was adopted in June 2019.

2.17. Policy DS2: Sites for Gypsies, Travellers and Travelling Showpeople sets out the required pitch provision for Gypsies and Travellers in the Borough up to 2032. The pitch provision was identified by the Rugby Borough Council Gypsy and Traveller Accommodation Assessment Study 2017⁶.

2.18. Policy DS2 states that the Council will allocate land in a separate Gypsy and Traveller Site Allocations Development Plan Document (DPD) to meet the requirements as identified by the Gypsy and Traveller Accommodation Assessment (GTAA) 2017. The GTAA will be updated on a regular basis and pitch allocations requirements updated through the GTAA process. The requirements identified in the GTAA 2017 and subsequently set out in Policy DS2 are as follows:

Figure 2 - Local Plan Policy DS2 - Additional Gypsy and Traveller residential pitches required 2017-2032 (Source: Rugby Borough Local Plan 2011-2031, adopted June 2019)

Timeframe	Total required pitch provision
2017 to 2022	35
2022 to 2027	12
2027 to 2032	14
Total	61

⁴ National Planning Policy Framework 2021 – <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁵ Rugby Local Plan 2011-2031, adopted June 2019 – https://www.rugby.gov.uk/info/20004/planning_strategy/348/local_plan_2011-2031

⁶ Rugby Borough Council Gypsy and Traveller Accommodation Assessment Study, August 2017 - https://www.rugby.gov.uk/downloads/file/1450/lp_57_-_gypsy_and_traveller_accommodation_assessment_study

2.19. Policy DS2 also sets out the criteria to be used when assessing the suitability of sites for allocation for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople, and for the purposes of considering planning applications for such sites.

2.20. The supporting text to Policy DS2 in Paragraphs 4.20 to 4.28 of the Local Plan sets out the expected approach to the Gypsy and Traveller Site Allocations DPD.

3. Gypsy and Traveller Accommodation Need in Rugby Borough

Introduction

- 3.1. In June 2022 the latest version of the Rugby Borough Gypsy and Traveller Accommodation Assessment Study (GTAA) was completed, and it is published alongside this consultation document.
- 3.2. The 2022 GTAA replaces the 2017 GTAA which was used to set the required pitch provision for Gypsies and Travellers in Policy DS2: Sites for Gypsies, Travellers and Showpeople in the adopted Rugby Borough Local Plan 2011-2031.
- 3.3. The GTAA took into account current pitch need and demand, as well as future need, and was based on interviews with Traveller households that were undertaken on sites in Rugby Borough. The GTAA assessed the need for the period 2022-2042. The base date for the need figures is 1 April 2022.
- 3.4. The GTAA was produced in line with the definitions of Gypsies and Travellers as set out in the 2015 Planning Policy for Traveller Sites. It identified accommodation needs for:
 - households that meet the definition of Gypsies and Travellers and Travelling Showpeople in Annex 1 of Planning Policy for Traveller Sites;
 - households who do not meet the definition; and
 - households that could not be determined.
- 3.5. The GTAA considered the requirement for two different types of pitches:
 - Residential pitches that can be a longer-term base for a household; and
 - Temporary or transit pitches.

Permanent accommodation requirements in Rugby Borough

- 3.6. Figure 3 below shows the permanent pitch requirements of Gypsy and Traveller households meeting the planning definition.

Figure 3: Permanent pitch requirements of Gypsy and Traveller households meeting the planning definition (Source: Rugby Borough GTAA, 2022)

Years	Pitches
2022-2027	19
2027-2032	12
2032-2037	13
2037-2042	14
Total	58

- 3.7. 19 pitches are required in the first 5 years for households meeting the planning definition. Need occurring after 2027 results from household formation.
- 3.8. Figure 4 below shows the permanent pitch requirements of Gypsy and Traveller households that did not meet the planning definition but may be protected under equality legislation as ethnic Gypsies or Travellers. It is proposed that their need is addressed in this Plan as it would otherwise persist.

Figure 4: Permanent pitch requirements of Gypsy and Traveller households that did not meet the planning definition (Source: Rugby Borough GTAA, 2022)

Years	Pitches
2022-2027	40
2027-2032	14
2032-2037	15
2037-2042	16
Total	85

Issue 1 – Gypsy and Traveller Accommodation Need

Option 1 – Should the Council be planning for the level of permanent residential pitches according to:

- (a) the Ethnic definition identified in the 2022 GTAA; or**
- (b) the PPTS 2015 definition identified in the 2022 GTAA?**

Option 2 – Should the Council be planning for a higher level of permanent residential pitches as defined in the 2022 GTAA (either Ethnic definition or PPTS 2015 definition)

if so, what evidence do you have to justify this need?

Option 3 – Should the Council be planning for a lower level of permanent residential pitches than that identified in the 2022 GTAA

(either Ethnic definition or PPTS 2015 definition), if so, what evidence do you have to justify this need?

Option 4 – Is there another approach to identify the Gypsy and Traveller accommodation need that the Council should consider. Please provide details of this approach in your response.

Issue 2 – Travelling Showpeople Accommodation Need

Option 1 – Should the Council be planning for any plots for Travelling Showpeople given that the latest 2022 GTAA identified no resident travelling showpeople in the Borough?

Option 4 – Is there is another approach to identify the Travelling Showpeople need that the Council should consider. Please provide details of this approach in your response.

Transit accommodation requirements in Rugby Borough

- 3.9. Transit accommodation can offer a safe place to stay for transient Travellers. Where groups or individuals travel through the Borough this can result in unauthorised encampments.
- 3.10. The 2022 GTAA found that there was a total of 20 unauthorised encampments (on the planning definition) and 27 unauthorised encampments (on the wider definition)
- 3.11. Provision could be made for authorised short-term (less than 28 days) stopping sites to meet temporary accommodation need. These sites are known as transit sites or emergency stopping sites. They should offer temporary stay for transient Travellers and assist in managing unauthorised encampments. No set number of pitches are proposed in the GTAA.

Issue 3 – Transit Accommodation Need

Option 1 – a) Should the Council be planning for transit/emergency stopping sites in Rugby Borough as identified in the 2022 GTAA?

Option 1 – b) What size should the temporary or transit/ emergency stopping sites be?

Option 2 – Is there another approach to the provision of transit/ emergency stopping sites that the Council should consider. Please provide details of this approach in your response.

4. The Location of Gypsy and Traveller Pitches

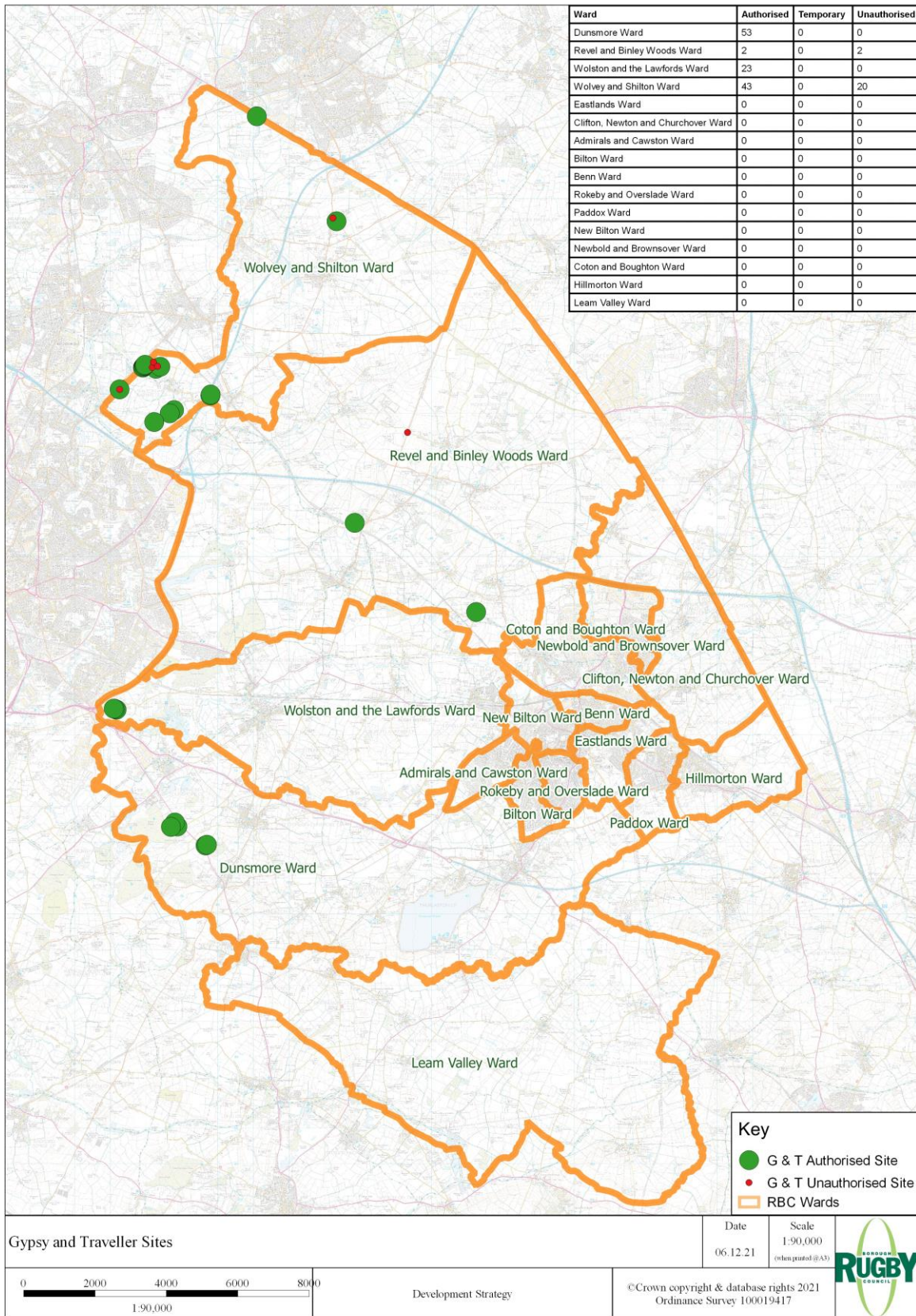
- 4.1. This section of the Issues and Options document sets out a range of possible options for locating sites to be allocated in the Gypsy and Travellers Site Allocations DPD given the need highlighted in Section 3 above.
- 4.2. The Council will approach the need for permanent residential pitches, transit pitches and plots for Travelling Showpeople separately.
- 4.3. Policy GP2 of the adopted Rugby Local Plan 2011-2031 sets out the settlement hierarchy which identifies where new development should be located. Broadly, the policy encourages development to locate in existing settlements, the larger the better and discourages development in small settlements or remote locations. Development is resisted in the open countryside and Green Belt and will only be allowed in these locations in accordance with national policy.

Policy GP2: Settlement Hierarchy
Development will be allocated and supported in accordance with the following Settlement Hierarchy, as defined on the Policies Map:

Rugby town	Main focus for all development in the Borough. Development permitted within existing boundaries and a s part of allocated Sustainable Urban Extensions.
Main Rural Settlements <i>Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston, Wolvey.</i>	Development will be permitted within the existing boundaries of all Main Rural Settlements and on allocated sites
Rural Villages	Development will be permitted within existing boundaries only, including the conversion of existing buildings where national policy permits.
Countryside	New development will be resisted; only where national policy on countryside locations allows will development be permitted.
Green Belt	New development will be resisted; only where national policy on Green Belt allows will development be permitted.

- 4.4. One approach to the location of permanent residential pitches for Gypsies and Travellers could be to increase capacity on existing authorised sites, regardless of their location or the conditions on those existing sites [*Option 1*]. Another option is to expand the area of existing authorised sites by making the site larger [*Option 2*].
- 4.5. On the one hand, these existing sites are likely to have been chosen by Gypsies and Travellers as having locational advantages for their needs and as such may be good locations for these groups. On the other hand, these sites might be overcrowded or offer a poor living environment and intensification of these sites may make conditions worse. All the existing authorised sites in Rugby Borough are located in the Green Belt and in the countryside, locations in which you would not seek to locate development.
- 4.6. As Map 1 below shows there is an uneven distribution of Gypsy and Travellers sites across Rugby Borough with a substantial concentration of existing sites in the north west of the Borough in Wolvey and Shilton ward and in the west of the Borough in Dunsmore ward. Dunsmore ward includes the Council owned Gypsy and Traveller site.
- 4.7. Concentrating new pitches in these areas may have an ongoing impact on the amenities of residents in the settled community as well as potentially having implications for the provision of/ access to local infrastructure and services, such as education and health facilities. One option could be to increase capacity/expand existing sites but outside of Wolvey and Shilton ward, and Dunsmore ward [*Option 3*].
- 4.8. The Council could take the view that one way of contributing to meeting need would be to authorise pitches that are currently unauthorised or have a temporary permission. However, taking such an approach would continue to concentrate provision in Wolvey and Shilton ward which already has made a significant contribution to meeting the needs of Gypsies and Travellers in the Borough.
- 4.9. An alternative option to increasing capacity/expanding existing sites could be to identify new sites in locations identified as suitable for new development in Policy GP2 (above) of the adopted Rugby Local Plan 2011-2031, i.e. Rugby town and the Main Rural Settlements [*Option 4*].
- 4.10. New sites could also be identified in the more rural areas identified in Policy GP2 (above), such as Rural Villages and the Countryside. However, this option would be contrary to Policy GP2 [*Option 5*].

Map 1 – Existing Gypsy and Traveller Sites in Rugby Borough at November 2021



Permanent Residential Pitches

4.11. The options for meeting the need for permanent residential pitches are set out below:

Issue 4 – The Location of Permanent Residential Pitches

Questions:

- 1. Of the permanent residential pitch options outlined below which one would be the best approach?**
- 2. Could a combination of options be used until the need is met, and if so, which options?**
- 3. Are there any other realistic and reasonable ways in which future permanent residential pitch requirements may be met? If so, please explain in your response.**

Option 1 – Increase capacity on existing authorised sites, where possible.

Option 2 – Expansion of the site area of existing authorised sites, where possible.

Option 3 – Increase capacity/ expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward?

Option 4 – Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements as identified in Policy GP2 of the Rugby Borough Local Plan with good access to services and facilities.

**Option 5 – Allocation of new sites in more rural areas (Rural Villages and Countryside), but still with reasonable access to essential services.
[Contrary to Policy GP2]**

Transit Pitches

4.12. There is a lack of transit provision across all of the Warwickshire local authorities including within Rugby. The 2022 GTAA recommends the adoption of a negotiated stopping policy and/or new transit provision consisting of between 6-10 pitches situated in or close to Rugby Town, near to main arterial routes e.g. M45 or the M6. 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 agreed location for a few days. The inclusion of transit pitches is likely to lead to fewer unauthorised encampments which adversely impact on the local community.

Issue 5 –

Questions:

Negotiated Stopping Policy

Q1 – Do you agree with a new negotiated stopping policy?

Location of Transit Pitches

Q2 – Which option do you consider is the best approach for locating transit pitches within the Borough?

Option 1 – One or two transit sites close to Rugby (each consisting of 6-10 pitches) per site.

Option 2 – One or two transit sites near to main arterial routes e.g. M45 or the M6 (each consisting of 6-10 pitches). The exact location would need to be informed by detailed discussions with the Local Highway Authority.

Option 3 – a combination of one site close to Rugby and one on a main arterial route

~~Option 4 – Combined residential/ transit pitches where provision for one or two pitches are provided for in conjunction with new permanent residential pitch provision.~~

Travelling Showpeople Plots

4.13. The GTAA states that there are no travelling showpeople residing within Rugby Borough.

5. The Size and Design of Gypsy and Traveller Sites

Size of Sites

- 5.1. Evidence in the 2022 GTAA suggests that there is a preference by Travellers for relatively small, permanent residential sites often in a family group. Small sites are more likely to be assimilated into a local community and can reduce the potential tensions between Traveller families. Smaller sites can also be easier to manage and maintain. Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031 sets out criteria to be used when assessing the suitability of sites for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople. One of the criteria is that *'the development is appropriate in scale compared with the size of the existing settlement or nearby settlements'*.
- 5.2. Sites can vary in size, although they should be at least large enough to accommodate one pitch. A pitch is an area of land where a Traveller household can reside. Typically, a pitch contains space for one or more caravans, usually one static caravan and one touring caravan, an amenity block or day room, parking spaces, and outdoor space.
- 5.3. To meet the current and future need for Traveller accommodation, the Council has identified two options for the size of sites: provide fewer larger sites or provide a greater number of smaller sites.

Issue 6 – Size of sites

Option 1 – Provide fewer larger permanent sites to accommodate, for example, no more than 10 pitches each.

Option 2 – Provide a greater number of smaller sites to accommodate, for example, no more than 2 pitches each.

Option 3 – Is there is another approach to the size of sites. Please provide details of this approach in your response.

Site Design Standards

- 5.4. Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031 sets out criteria to be used when assessing the suitability of sites for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople. One of the criteria is that *'the development will comply with Policy SDC1 in respect of design and impact on the surrounding area and amenity of existing residents.'* Policy SDC1 is set out below.

Policy SDC1: Sustainable Design

(Source: Rugby Borough Local Plan 2011-2031, Adopted June 2019)

All development will demonstrate high quality, inclusive and sustainable design and new development will only be supported where the proposals are of a scale, density and design that responds to the character of the areas in which they are situated. All developments should aim to add to the overall quality of the areas in which they are situated.

Factors including the massing, height, landscape, layout and materials and access should also be a key consideration in the determination of planning applications.

The Council will consider appropriate housing density on a site by site basis with decisions informed by local context of the area in terms of design considerations, historic or environmental integration, local character, identified local need and, where relevant, a Neighbourhood Development Plan.

Proposals for new development will ensure that the living conditions of existing and future neighbouring occupiers are safeguarded.

Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent sites where there is potential for conflict between the uses, for example, an existing waste management site. Such proposals must be accompanied by supporting information demonstrating that the existing and proposed uses would be compatible and that the proposal has addressed any potential effects of the existing use on the amenity of the occupiers of the proposed development.

Developers should provide adequate off-street storage space for wheeled bins, including storing recycling, to serve all new residential properties, including conversions. This requirement is particularly important in designated Conservation Areas where the visual importance of the street scene has been acknowledged and there is a duty for the area's character and appearance to be preserved or enhanced. Provision can be in the form of storage space integral to the design of the property, dedicated space externally, in a communal storage area, or in underground waste storage systems.

Proposals relating to the enhanced energy efficiency of existing buildings will be supported in accordance with the most up to date national regulations.

5.5. The Council considers that in addition to Policy SDC1 it would be helpful to provide specific design standards in the DPD for Gypsies, Travellers and Travelling Showpeople sites. This could include:

- A minimum pitch size;
- Minimum on-pitch facilities;
- Site layout;
- Caravan/mobile home minimum separation distances for fire safety;
- On site facilities; and
- External lighting.

- 5.6. Table 1 below sets out an example of the design standards for Gypsies, Travellers and Travelling Showpeople sites that could be included in the DPD.

Table 1 – Example of Design Standards for Gypsy & Traveller Pitches and Travelling Showpeople Plots

Each pitch should measure at least 500 square metres (0.05ha) and provide as a minimum the following on-pitch facilities:

- Hard standing for 1 touring/ mobile caravan;
- Hard standing for 1 static caravan;
- 2 car parking spaces;
- 1 amenity block;
- Hard standing for storage shed and drying; and
- Garden/ amenity area.

The above facilities will be laid out to ensure the security and safety of residents and to allow ease of movement, whether walking, cycling or driving.

To ensure fire safety, every caravan or mobile home is required to be separated from any other caravan or mobile home by a distance of at least 6 metres.

As a minimum the following utilities must be provided on site:

- Mains water;
- Electricity supply;
- Drainage including sustainable urban drainage system (SUDs) where appropriate;
- Sanitation; and
- Screened storage and efficient collection of waste, including recyclable materials.

Proportionate levels of external lighting will be provided based on the size of the site, its location and any potential biodiversity impact. Any lighting scheme is required to avoid a detrimental impact on the surrounding locality by avoiding light spill outside of the site.

If granting permission on a shared site on an open plan basis rather than individual private pitches (usually on sites with extended families), permission should be given on a pitch-by-pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate 2 touring caravans and 2 static caravans along with 4 parking spaces, 2 amenity blocks etc could be counted as 2 pitches.

Plots for Travelling Showpeople should be provided in accordance with the above standards and also provide adequate space to store and maintain large pieces of equipment (including heavy good vehicles, fairground rides and other fairground equipment).

Issue 7 – Design Standards

Option 1 A – Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. The design standards set out in Table 1 are appropriate.

Option 1 B - Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. However, the design standards set out in Table 1 are not appropriate. Please explain what you consider to be appropriate design standards.

Option 2 – Given the diversity of sites and locations it is not possible to set design standards. Please explain your response.

6. Site Assessment Criteria for Gypsy and Traveller Sites

6.1. Policy DS2 in the adopted Rugby Borough Local Plan 2011-2031 sets out the following criteria to be used to assess the suitability of sites for allocation for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople, and for the purposes of considering planning applications for such sites:

- The site affords good access to local services such as schools and health facilities;
- The site satisfies the sequential and exception tests for flood risk and is not adjacent to uses likely to endanger the health of occupants such as a refuse tip, sewage treatment works or contaminated land;
- The development is appropriate in scale compared with the size of the existing settlement or nearby settlements;
- The development will be able to achieve a reasonable level of visual and acoustic privacy both for people living on the site and for those living nearby;
- The development has appropriate vehicular access;
- The development will comply with Policy SDC1 in respect of design and impact on the surrounding area and amenity of existing residents;
- The development will be well-laid out to provide adequate space and privacy for residents;
- The development will include appropriate landscape measures to mitigate visual impacts and to ensure adequate levels of privacy and residential amenity for occupiers and adjacent occupiers but which avoids enclosing a site with an inappropriate amount of hard landscaping, high walls or fences;
- The development should not accommodate non-residential uses that may cause, by virtue or smell, noise or vibration, significant adverse impact on neighbouring business or residents; and
- Adequate provision for on-site services for water supply, power, drainage, sewage and waste disposal facilities.

6.2. In addition to assessing the suitability of sites, availability and achievability will also be assessed. Availability will include existing land use, land ownership and any legal constraint. Achievability will include whether the site has any constraints to delivery such as alternative land uses, remediation work required and viability.

Issue 8 – Site assessment criteria

Option 1 – Do you agree with the existing suitability criteria listed in Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031?

Option 2 – Should some, or all, of the existing suitability criteria listed in Policy DS2 be deleted or amended, and if so, which criteria? Please explain your response.

Option 3 – Should new criteria be added to the existing suitability criteria in Policy DS2? Please explain your response.

Option 4 – Do you agree with the availability and achievability criteria in Paragraph 6.2 above? Please explain your response.

Option 5 – Should the suitability criteria in Policy DS2 and the availability and achievability criteria in Paragraph 6.2 above be used for transit sites? If not, please explain in your response why not and if you think another approach should be used instead.

7. Sustainability Appraisal of the Issues and Options

- 7.1. Rugby Borough Council has appointed Land Use Consultants to carry out a Sustainability Appraisal (SA) incorporating a Strategic Environment Assessment (SEA) of the Rugby Borough Gypsy and Traveller Site Allocations Development Plan Document.
- 7.2. SA/SEA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.
- 7.3. The first stage of the SA/SEA process is to prepare the SA Scoping Report to provide the context for, and to determine the scope of the SA/SEA of the DPD. The Scoping Report also sets out the framework for undertaking the subsequent stages of the SA/SEA process. The Scoping Report for this DPD was prepared in May 2022 and consultation held between 4 May and 10 June 2022 with the three statutory bodies of Environment Agency, Historic England and Natural England.
- 7.4. A Sustainability Appraisal of the issues and options in this Issue and Options consultation document has been undertaken and the Council is seeking your views on the SA. The Issues and Options Sustainability Appraisal is available as a separate document on the Council's website.

Issue 9 – Sustainability Appraisal of the Issues and Options

Option 1 – The Sustainability Appraisal of the Issues and Options is appropriate.

Option 2 – The Sustainability Appraisal of the Issues and Options is inappropriate. Please explain in your response why you consider the SA is inappropriate and provide details of how you think it should be amended.

8. Any other issues?

- 8.1. This Issues and Options consultation document has set out the issues that the Council has identified should be addressed in the Rugby Borough Gypsy and Traveller Site Allocations DPD. The Council would like to know if there are any issues that have been missed.

Issue 10 – Any other issues

Are there any other issues that this Issues and Options consultation document has not identified that need to be considered as part of the preparation of the Rugby Borough Gypsy and Traveller Site Allocations DPD?