

Consultation

Thank you for your time and co-operation in responding to this consultation. It would be helpful if you could use this questionnaire.

The Welsh Government intends to publish a summary of the responses to this document. Normally, the name and address (or part of the address) of its author are published along with the response, as this gives credibility to the consultation exercise.

Name * :

Organisation (if applicable):

Address:

Telephone:

Email * :

1. Does the guidance fully explain the key considerations when designing local authority Gypsy and Traveller sites? Are there further issues that you feel need to be included?

Yes, fully

Yes, mostly

No

If you answered 'No', are there further issues that you feel need to be included?:

There is a lack of information within any of the documents as to how the location of sites concerned would be selected – issues for Natural Resources Wales (NRW) would be entirely dependent on where the sites were to be i.e. protected sites, species, flood zones, drainage, waste management, landscape.

Paragraphs 19, 35 and 35 of the 2007 Circular identify the need to take landscape, flood risk and biodiversity into account when considering sites. Nevertheless, we consider that the draft guidance should clarify in paras 3.1 and 3.3, that the number of pitches permissible should also reflect environmental capacity i.e. flood risk, biodiversity, and landscape. Heavy use of a site could take a toll on natural and cultural heritage assets in and around a site. There is a need to consider the sensitivity of natural and cultural heritage assets in and around the site.

Drainage could be an issue, particularly as such sites are usually outside of publicly sewered areas. Discharges of foul drainage would have to be treated and include a suitable soakaway or watercourse for its discharge. Sites could be proposed within major aquifers that include potable water supplies where soakaways would not be acceptable. Surface water may also require oil/petrol interception prior to watercourse/soakaway disposal.

We recommend some sort of assessment of what a typical gypsy and traveller site would look like— would it be significantly different from that of a touring caravan site for example?

We also recommend reference is made to boundary planting/screening, both to integrate with the surrounding landscape and provide privacy. Native planting that reflects the locality e.g. hedgebanks and native trees, orchard/fruit trees can be used in a positive way. 'Natural play' areas can be incorporated and large expanses of hard standing should be avoided. The sympathetic design of utility buildings and use of natural materials e.g. in surfacing is important. Some members of the gypsy/traveller community have experience of management techniques such as hedge laying, coppicing. The use of management plans, particularly for site boundaries, should be referenced in the guidance.

It is noted that paragraphs 3.12 to 3.15 relate to location of sites. The subparagraph that is entitled "the specific site" does refer to the flood maps associated with TAN15. We recommend that this paragraph should include..."and an acceptable flood consequence assessment in accordance with TAN15". This is where reference to foul drainage disposal could be included too.

2. Do you agree that the ideal size of a local authority residential Gypsy and Traveller site is 12 pitches?

- Yes
- No

Please explain why you agree or disagree with the recommended ideal size.:

Issues regarding size of sites and extensions should also be considered in the context of proximity to settlement boundaries e.g. edge of settlement sites might be able to accommodate more pitches than those in open countryside due to fewer environmental constraints, and would also help sustainability issues in terms of minimising need to travel by car.

We consider that there is a need to consider basic human needs for 'defensible space' when working out density of provision of pitches. Again, consultation with travelling communities and observation of what they regard as a good site may assist in quantifying this. There are many landscape techniques such as planting, walls or changes in levels that can be used to 'naturally' limit how many travellers would fit on a site. In 'tree branch' layouts for example, the spaces between the branches might include lower hollows or higher bunds, which might also include woodland-like (low maintenance, naturalistic, native species) planting. This in

turn would contribute to many other benefits, such as the 'buffer' screening between the site and neighbouring properties or land uses

3. Do you agree that new local authority Gypsy and Traveller sites should not exceed 20 pitches in size unless there are good reasons?

- Yes
 No

Please explain why you agree or disagree with the recommended size limit.:

Please see answer to question 2.

4. What reasons (if any) do you believe would make it reasonable to create larger sites?:

No comments.

5. Do you think that there should be a minimum play area size provided on new local authority Gypsy and Traveller sites?

- Yes
 No

What size should this be and for what reasons?:

NRW welcome provision for play areas, although where on edge of settlements this could be provided by improving access to and quality of existing play areas within/ edge of settlements.

6. Should business activities be allowed on permanent residential sites?

- Yes

No

Please give your reasons for this. If they are allowed, what should be done to make sure children and others are kept safe on site?:

We consider that business activities should not be allowed unless working from home without the need for additional space/ development, and in line with any LDP policy on this issue.

7. Should business activities be allowed on transit sites?

Yes

No

Please give your reasons for this. If they are allowed, what should be done to make sure children and others are kept safe on site?:

We consider that business activities should not be allowed unless working from home without the need for additional space/ development, and in line with any LDP policy on this issue.

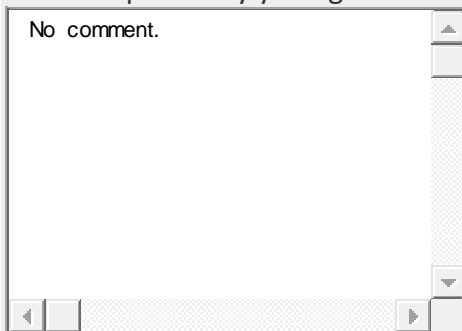
8. Do you agree with the Welsh Government's guidance that local authorities should consider barriers at site entrances, including key code access and height-restriction barriers?

Yes

No

Please explain why you agree or disagree with the recommendation to use barriers.:

No comment.



9. Do you agree that the ideal size of a local authority transit Gypsy and Traveller site should be 7-10 pitches, and should not exceed 10 pitches?

Yes

No

Please explain why you agree or disagree with the recommended ideal size.:

Issues regarding size of sites and extensions should also be considered in context of proximity to settlement boundaries e.g. edge of settlement sites might be able to accommodate more pitches than those in open countryside due to fewer environmental constraints, and would also help sustainability issues in terms of minimising need to travel by car.

We consider that there is a need to consider basic human needs for 'defensible space' when working out density of provision of pitches. Again, consultation with travelling communities and observation of what they regard as a good site may assist in quantifying this. There are many landscape techniques such as planting, walls or changes in levels that can be used to 'naturally' limit how many travellers would fit on a site. In 'tree branch' layouts for example, the spaces between the branches might include lower hollows or higher bunds, which might also include woodland-like (low maintenance, naturalistic, native species) planting. This in turn would contribute to many other benefits, such as the 'buffer' screening between the site and neighbouring properties or land uses.



10. Do you agree with the Welsh Government's guidance that each pitch on local authority transit sites should be provided with an individual amenity block?

- Yes
 No

Please explain why you agree or disagree with the recommendation for individual amenity blocks.:

No comments.

11. Do you agree with the Welsh Government's guidance that postal arrangements should not be required for transit sites?

- Yes
 No

Please explain why you agree or disagree with the recommendation that postal arrangements are not required on transit sites:

No comment

12. Do you have any other comments?:

NRW advise that techniques are considered to provide hard standing that allow for sustainable drainage. The need for large expanses of tarmac or concrete may be reduced if for example peripheral pitches are made from reinforced grass-crete or similar. Likewise, key roads and tracks through the site might be defined by hard surfacing whereas pitches (with less passing traffic wear) could be grass-crete or similar.

Our experience is that the most successful sites are small family sites, managed by the gypsies/travellers living on the site, often close to/on the edge of existing communities and with access to services/part of the community, but self-contained.

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept anonymous please tick the box: