

## HBBC Response to Rugby Borough Council

<b><i>Issues and Questions</i></b>	<b>HBBC Response</b>
<b><i>Issue 1 – Gypsy and Traveller Accommodation Need</i></b>	
<p><b>Option 1 – Should the Council be planning for the level of permanent residential pitches according to:</b>            (a) the Ethnic definition identified in the 2022 GTAA; or            (b) the PPTS 2015 definition identified in the 2022 GTAA?</p> <p><b>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?</b></p> <p><b>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?</b></p> <p><b>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.</b></p>	<p>The council should at least plan for option 1, basing its' level of permanent residential pitches on the PPTS 2015 definition.</p> <p>Given the case of Lisa Smith, and the judgement of the Court of Appeal that has upheld claims that the planning policy definition of Gypsies and travellers discriminates unlawfully against those who have to give up their nomadic lifestyles due to disability or old age, it is possible that definition may revert to the PPTS 2015 definition. To plan for meeting the identified need using the 2015 definition would ensure the plan making process is robust going forward.</p>
<b><i>Issue 2 – Travelling Showpeople Accommodation Need</i></b>	
<p><b>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?</b>  <b>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.</b></p>	<p>The Council should not be planning any plots for Travelling Showpeople, but should set out the principles upon which any future applications for plots would be assessed.</p>
<b><i>Issue 3 – Transit Accommodation Need</i></b>	

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<p><b>Option 1 – a) Should the Council be planning for transit/emergency stopping sites in Rugby Borough as identified in the 2022 GTAA?</b></p> <p><b>Option 1 – b) What size should the temporary or transit/emergency stopping sites be?</b></p> <p><b>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.</b></p>	<p>The Council could plan for at least one transit / emergency site in the Borough of up to 10 pitches. However many local authorities are moving towards using negotiated stopping sites rather than provision of transit sites. The council could consider a balance between the two approaches to be able to respond to the need for time limited stopping places.</p>
<p><b>Issue 4 – The Location of Permanent Residential Pitches</b></p>	
<p><b>Questions:</b></p> <p><b>1. Of the permanent residential pitch options outlined below which one would be the best approach?</b></p> <p><b>2. Could a combination of options be used until the need is met, and if so, which options?</b></p> <p><b>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.</b></p> <p><b>Option 1 – Increase capacity on existing authorised sites, where possible.</b></p> <p><b>Option 2 – Expansion of the site area of existing authorised sites, where possible.</b></p> <p><b>Option 3 – Increase capacity/ expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward ?</b></p> <p><b>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.</b></p> <p><b>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]</b></p>	<p>Existing private sites are usually family owned and run. They are therefore generally not available to meet the identified need of the wider population. Where there is capacity to meet the identified family need on a site, or an extension to the site, this should be the first preference in allocating pitches.</p> <p>Where there is not sufficient capacity to intensify or extend, consideration must be given to allocation of new sites. Where this is under consideration, sites should be within easy access to local services, in a safe environment and a sustainable location.</p>

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<b>Issue 5 –</b>	
<p><b>Questions:</b>  <b>Negotiated Stopping Policy</b>  <b>Q1 – Do you agree with a new negotiated stopping policy?</b></p> <p><b>Location of Transit Pitches</b>  <b>Q2 – Which option do you consider is the best approach for locating transit pitches within the Borough?</b>  <b>Option 1 – One or two transit sites close to Rugby (each consisting of 6-10 pitches) per site.</b>  <b>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.</b>  <b>Option 3 – a combination of one site close to Rugby and one on a main arterial route</b>  <b>Option 4 – Combined residential/ transit pitches where provision for one or two pitches are provided for in conjunction with new permanent residential pitch provision.</b></p>	<p>Yes.</p> <p>Location of transit pitches should be allocated with regard to the main transit routes into and through the Borough. Option 2 would have best fit for this approach.</p>
<b>Issue 6 – Size of sites</b>	
<p><b>Option 1 – Provide fewer larger permanent sites to accommodate, for example, no more than 10 pitches each.</b>  <b>Option 2 – Provide a greater number of smaller sites to accommodate, for example, no more than 2 pitches each.</b>  <b>Option 3 – Is there is another approach to the size of sites. Please provide details of this approach in your response.</b></p>	<p>The GTAA identifies the need arising in the Borough and should be used to inform the best fit for the identified need. A small number of larger sites is acceptable if the arising need forms households who would be compatible on one site. Otherwise consideration should be given to smaller sites.</p>
<b>Issue 7 – Design Standards</b>	
<p><b>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.</b></p>	<p>Option 1A is supported for provision of sites. The design standards set out in table 1 are compatible with the guidance set out in the Government’s Designing Gypsy and Traveller</p>

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<p><b>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.</b></p> <p><b>Option 2 – Given the diversity of sites and locations it is not possible to set design standards. Please explain your response.</b></p>	<p>sites which, whilst dated, still demonstrates best practice in the design and location of sites.</p>
<p><b>Issue 8 – Site assessment criteria</b></p>	
<p><b>Option 1 – Do you agree with the existing suitability criteria listed in Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031?</b></p> <p><b>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.</b></p> <p><b>Option 3 – Should new criteria be added to the existing suitability criteria in Policy DS2? Please explain your response.</b></p> <p><b>Option 4 – Do you agree with the availability and achievability criteria in Paragraph 6.2 above? Please explain your response.</b></p> <p><b>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.</b></p>	<p>Option 2 is supported. All of the criteria I policy DS2 are appropriate, but consideration could be given to adding the possibility of safe walking routes to the nearest amenities.</p>
<p><b>Issue 9 – Sustainability Appraisal of the Issues and Options</b></p>	
<p><b>Option 1 – The Sustainability Appraisal of the Issues and Options is appropriate.</b></p> <p><b>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.</b></p>	<p>Option 1 is supported</p>
<p><b>Issue 10 – Any other issues</b></p>	
<p><b>Are there any other issues that this Issues and Options</b></p>	<p>The identification of need as set out in this document is tenure neutral. Consideration</p>

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<b>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?</b>	should be given to whether there is any identified need for affordable pitches – if there is none identified and therefore no provision will be made, then this should be explicit within any policy document.