



Development Department

Your reference: Consultation: draft Policy HS 3 (amended) – ‘Travellers Accommodation’

Our reference: #119204

Being dealt with by: David Purchase

Date: 2011

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Dear Sir or Madam,

RE: Consultation: draft Policy HS 3 (amended) – ‘Travellers Accommodation’

Please find attached our provisional response to this consultation document. Please note that this is still subject to final ratification by full council.

Provisional Response

- 1.1.1. The Council is broadly supportive of the proposed changes and the flexibility they should bring to help address the issues of finding suitable Traveller sites.
- 1.1.2. However some areas of concern have been identified.
- 1.1.3. Firstly, experience from Wales and England has shown that Travellers sites are far more likely to be successful and avoid problems if they are set up and managed according to certain guidelines. These guidelines and good practice have been captured in design guides published by DOENI, ECNI & DCLG (*Equality Commission NI Minimum Standards for Traveller Sites*, *DOE Design Guide for Traveller Sites* and the Dept for Community and Local Government *Good Practice Guidance Publications*).
- 1.1.4. It may be sensible to make conformance to these guidelines a condition under the revised HS3. Clear reference to these guidelines at the planning stage would also be useful from the perspective of licensing sites under the 1963 Caravans Act.
- 1.1.5. Secondly, while we do support the flexibility of the changes, the ambiguity of the term ‘countryside’ may cause issues. In particular, the policy may benefit from guidance for the consideration of traveller accommodation on designated sites in the countryside, for example an Area of Outstanding Natural Beauty (AONB) or an Area of Special Scientific Interest (ASSI).
- 1.1.6. It may be appropriate for the new policy to identify what areas of planning restraint will not be considered for traveller accommodation. This would have the benefit that planning applications that realistically would not be approved, will not be submitted. This in turn would save the Department and the applicant time and expense.
- 1.1.7. If this clarity cannot be included within the main policy itself it may be that the Justification section below the policy could elaborate on the treatment of protected areas.
- 1.1.8. In closing, and based on experiences seen in other places where attempts have been made to increase flexibility, we stress the need to ensure that this flexibility is then used.



For example it might be beneficial to use an independent assessor to determine the suitability of sites and an inter-agency approach to assess the need for sites.

1.1.9. Thank you for asking us to respond to the proposals.

Yours faithfully

David

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