

Report Number: SWT 15/20

Somerset West and Taunton Council

Executive: 22 January 2020

Purchase of Otterford B Gypsy and Traveller Transit Site.

This matter is the responsibility of:

Councillor Francesca Smith Portfolio Holder for Housing

And

Councillor Marcus Kravis Portfolio Holder for Asset Management and Economic Development

Report Author: Gerry Mills Commercial Investment Specialist

1 Executive Summary

- 1.1 For some considerable period of time the Council has been trying to acquire a site known as Otterford B for use as a Gypsy and Traveller Transit Site.
- 1.2 The former Taunton Deane Borough Council (TDBC) had granted approval to purchase the site (pre formation of the new Somerset West and Taunton Council and as part of a previous administration) – however considerable time has elapsed since this was granted.
- 1.3 Site has extant planning for 6 pitches (12 vans in in total) as a transit site.
- 1.4 SWT have a grant of £150K for Capital Expenditure (CAPEX) to purchase the site and to complete additional works.

2 Recommendations

The Executive:

- **To purchase the property with vacant possession for development as a transit site at a cost of £35,000**
- **To seek an operator/management service for the site as outlined in the report**
- **Appoint a professional team to advise on:**
Development of the site: ensuring quality, cost control and developed to an

agreed specification with detailed programme timescales and budget.

3 Introduction

- 3.1 Somerset West and Taunton Council (SWT) are reviewing the opportunity to purchase the County Council owned Otterford B Gypsy Transit Site near Culmhead in the Parish of Otterford. This site has extant planning permission for 6 transit sites with associated services and facilities which have been partially implemented. This has been a Transit site since 2005 and was valued at between £20 and £25k in 2013. A re-valuation of the site was undertaken in November 2019 and the revised value of £35,000 was determined.
- 3.2 SWT are interested in purchasing this site to serve a significant planning function, both as a deterrent to, and option available for dealing with, unauthorised encampments - to deal with unauthorised encampments the Council must have an appropriate 'move on' facility which SWT currently doesn't have. SWT cannot therefore apply to move illegal encampments on as detailed in the Historic Context at Section 3 below.
- 3.3 A Gypsy and Traveller Accommodation Assessment carried out by De Montford University and updated in in 2013, highlighting that SWT were short of 83 permanent pitches and 5 transit pitches - this need has not yet been met.
- 3.4 This breaks down as the former TDBC requiring 75 residential and 5 transit; former WSC 8 residential and 0 transit.
- 3.5 There is an important distinction between the two geographical areas. Requirements are low in the former WSC area. This is potentially due to a number of factors:
- the G&T resident population is low in number (10 Caravans) and not increasing;
 - No traditional or historic G&T travelling routes pass through the area nor is it a regular destination for the community. As such there have been very few unauthorised encampments in the area and the last planning application for pitches was in 1976.
 - In the former TDBC area there is a larger resident population of Travellers (126 caravans across 20 privately owned sites and 1 publicly owned) but only one showpeoples group, numbers have remained relatively constant through the years. There are those who come to the area for short periods of time; the larger towns of Taunton and Wellington, are close to the strategic road network, persons are, in the main, passing through the area – pausing in a long journey or attending events locally such as funerals.

- There has been no planning applications since 2015 for Travellers sites. The Travelling Showpersons population is small (13 caravans in total on 1 site) with 1 yard in the former TDBC area, and the last planning permission was for extending residency in 2018.

3.6 The Council has no in-house management expertise to run a site. A partnership arrangement with an adjacent authority, housing association or other body is a preferred solution. However if this is not forthcoming this would default to SWT.

4 Historic Background

4.1 Otterford B is owned by Somerset County Council who are seeking to dispose of it after taking the decision in April 2011 to disband its Gypsy and Traveller service in light of the removal of its obligation to provide pitches under The Criminal Justice and Public Order Act 1994.

4.2 The County Council sold its Gypsy & Traveller residential sites and leased the transit site in Sedgemoor to a private company, Somerset Travellers Ltd, in December 2011. The then TDBC was made aware of The County Council's wishes to dispose of the remaining transit sites in its ownership, of which one - Otterford B - resides in the new SWT area, initially in 2010 and again in August 2012.

4.3 The site has an extant planning permission for 6 transit pitches with associated services, facilities and landscaping. The permission is partially implemented. The then TDBC paid for the planning permission, installation of mains water, electric and a Klargestar (sewage waste disposal system) sufficient for six pitches and a hard standing for one pitch.

4.4 Formerly, Taunton Deane Borough Council leased Otterford B from 2005 until 2010 when Somerset County Council revoked its lease agreement. Legal services made enquiries about TDBC continuing to lease the site (with or without County Council managing it), which were rejected.

4.5 In 2012 the County Council placed the site on the open market with a value of c£75,000. They were unsuccessful in securing a buyer. In 2013 SWT and SCC agreed a value of £25,000 with vacant possession or £20,000 if taken with the current resident who was placed on the site by the County Council. Legal Services recommendation is for vacant possession.

- 4.6 The County Council had received an Expression of Interest from Otterford Parish Council who wished to obtain the site for an unspecified "Community Use". The County Council issued Otterford Parish Council Heads of Terms (HoTS) The current position of Otterford Parish Council is appended at Appendix 1, where they have declared no further interest in acquiring the site.
- 4.7 At the time of this report, there were no lands for sale with permission for small amount of pitches. The nearest comparison was a gipsy site in Radford, 8 miles south west of Bath, where 1.3 acres of land is for sale for £100,000 comprising of a paddock and planning permission for one mobile home and a touring caravan.
- 4.8 SWT has no access to publicly owned Transit Pitches in Somerset. The Transit site in Sedgemoor, leased to Somerset Travellers Ltd, is closed and it is estimated that £200,000 is required to bring it back into active use. The other transit sites in the County Council's ownership are closed and they are seeking to dispose of them. The nearest Transit site is in Plymouth.
- 4.9 The Council has no in-house management expertise or funding for running the Otterford Site. A partnership arrangement with an adjacent authority, appointment of a shared traveller liaison post, housing association or other body could be a solution. Longer term there may be potential for a countywide management company to be formed between adjacent Districts, however there needs to be investigation into current appetite for this venture. Management of a Gypsy & Traveller site is intensive; trusting individual relationships have to be established with each of the residents, regular maintenance inspections would be required during periods of site occupation and security when unoccupied. An adjacent authority has a part-time officer who manages its residential sites.

5 Pros/Cons Of The Otterford B Site

- 5.1 There are advantages and disadvantages in operational, reputation and financial terms for the Council.
- 5.2 One concern for the suitability of the location of the Otterford site is the 2011 make-up of the G&T community. In 2011 Census identified that there are 733 residents in Somerset who describe their ethnicity as Gypsy or Irish Traveller, with one in three aged under 16 and almost half under 25. To clarify the settled Travellers have a higher education attainment levels than those who permanently travel. There is significant low levels of education attainment among those who permanently travel. The same is true for the health equalities, those who have a permanent residential base have higher health outcomes. The Dept. of Health funded exercise in 2011 highlighted that the G&T community in Somerset

experience notable health inequalities with one in six having long term health problems or disabled and 15% of the population in bad or very bad health. Given this information, the location of Otterford which is not close to schools or health facilities must be a considered factor to the purchase of the site. Although the health facilities could be improved by a mobile health unit when caravans are on site, or an information surgery signposting to services, if this option was explored and a mobile unit was available in the area.

Site options

The site options are set out briefly below:

Action	Pro's	Con's
Do Nothing	No capital, maintenance or management costs for SWT.	No provision: Identified GTAA needs not met, High risk and costs of unauthorised encampments. No accommodation for homeless or emergency cases. Reputation risk with G&T community, press, general public, Planning Inspectorate. Risk of legal action under Equalities/Human Rights.
Rely on private sites	No capital, maintenance or management costs for SWT.	No guarantee enough sites will come forward to meet need or that private landlords will rent pitches to aforementioned cases. Identified GTAA need not met, High risk and costs of unauthorised encampments. No accommodation for homeless or emergency cases. Reputation risk with G&T community, press, general public and Planning Inspectorate.

		Risk of legal action under Equalities/Human Rights.
Look for land for new site	<p>Sustainable location; in or adjacent to settlement.</p> <p>Addresses identified need.</p> <p>Deterrent, aid dealing with unauthorised encampments, emergency provision and homeless.</p>	<p>Difficulty in identifying sites (willing landowners).</p> <p>Reputation with general public, local opinion.</p> <p>Capital cost of land, cost of Planning App, implementation, maintenance and management.</p>
Buy Otterford B subject to valuation (with VP)	<p>Deterrent, aid dealing with unauthorised encampments, emergency provision, homelessness.</p> <p>Established site with planning permission.</p> <p>Vacant Possession.</p> <p>Mains utilities, internal road, one hard standing constructed on site.</p> <p>Addresses some of transit need in GTAA.</p> <p>Opportunity to offer pitches to adjacent authorities for a fee.</p>	<p>Capital cost of land, cost of improvements and additional pitches, maintenance, management and removing unauthorised people. Lack of wider community services and facilities in area (Bus, GP's, School).</p> <p>Concern over standard of adjacent residential site.</p> <p>Some G&T community members wouldn't chose to go to Otterford.</p>

6 Capital Costs

- 6.1 Please note all figures are provisional, as they're based on costs from construction and running of Gypsy sites elsewhere in the Country.
- 6.2 The 1.7acre/0.69ha Otterford site is valued at £35,000 with vacant possession. DCLG Designing Gypsy & Traveller Site: Good Practice Guidance published in 2008 sets out the minimum requirements for a transit site. Mains water, electric and a Klargester sufficient for six pitches and a hard standing for one pitch was installed in 2005. Improvements may be required to the existing elements to provide secure boundaries (soft and hard landscaping) with a clear 3m inside the perimeter for Fire Safety, defined public and private areas, screening of

unpleasant adjacent uses (scrap yard, tetra-mast, public road), access road of adoptable standard (3.7m wide for dual traffic with 5.5m passing places and drainage) which enables manoeuvring of a 15m trailer (see Department of Transport Manual for Streets published in 2007 & 2010), fire safety signage, refuse and recycling facilities and a non-combustible utility building (toilet, sluice, wash basin, shower, hot and cold water supply – for personal hygiene and laundry) for the existing pitch. Pitches must be clearly defined and able to accommodate 2 touring caravans (which could be up to 25m long), 2 parking spaces (2.4m x 4.8m) and a utility building.

- 6.3 Additional pitches and facilities could be implemented in phases as required or full planning permission implemented at once. Additional pitches must ensure 6m distance between separately occupied caravans, a non-combustible structure i.e. day room can be used to achieve separation. The DCLG guidance recommends designing out crime and designing in community, with safety of residents and children paramount. As transit pitches can be unoccupied for long periods adequate security is required to prevent vandalism to facilities and unauthorised occupancy.
- 6.4 An affordable housing provider constructed a Gypsy Site in October 2011 at a cost of £55,000 per pitch (mains electric, water and sewerage mains metered to each pitch, day rooms (kitchen, bathroom and laundry), playing facilities, CCTV, roads, hard standing, landscaping, etc).
- 6.5 SWT has a ring fenced fund of c £150,000 (£100,000 grant, £50,000 SWT reserve) for the provision on Gypsy & Traveller sites within the SWT Area (including the acquisition of the site).
- 6.6 Government periodically opens Gypsy & Traveller Sites Capital Grant programs which are administered through DCLG and HCA. These are for improvements or extensions to existing sites or provision of new pitches. However, currently, at the time of writing this brief, there is no funding or grants available to local authorities for this purpose.

7 Operating Costs of Sites and Managing Illegal Encampments

- 7.1 The same affordable housing provider estimated the running costs at £900 per pitch per year plus £1,800 per year for major repairs. They charge rent £64.26 per week per pitch. An adjacent authorities running cost for 14 pitches in 2012/13 were £44,563 for the 14 pitches (£3183 per pitch), the income from rent was £55,704 (avg of £76.52 per pitch per week). The same adjacent Local Authority has a part time Liaison Officer on Band D. Rents from their 14 Gypsy pitches pay for maintenance and contribute towards the employment of that Officer. DCLG collated national figures on annual maintenance costs range from £3,274 to £17,000 per pitch with management costs of between £15 and £17 per

week per pitch. Across the Country rents range from £26 to £105, depending on the size of the pitch and its services and facilities. DCLG figures demonstrate there is no established standardised rent or costs for Gypsy & Traveller sites.

7.2 Across the country pitch rents range from £58 to £105.83 depending on whether a single or double pitch and covers services and facilities although some do have council tax and water as additional charges. The pitch rent will cover the maintenance and management costs for most of the sites however, these are permanent pitches compared with transit sites. There is no guarantee that the site will be full all year and therefore forecasting any income could be difficult.

7.3 The cost of dealing with unauthorised encampments is significant. Somerset County Council paid out the following for clearing the sites following unauthorised encampments.

2016 £37,242

2017 £18,249

2018 £27,755

7.4 In the Taunton area of SWT in 2018, the costs to our parks service for 8 visits to clear Wellsprings and Blackbrook pavilion was £9,314 however this does not include legal, property or staff costs relating to these occasions along with the clearance of other traveller sites in our area for 2018 and previous years. Unfortunately these figures are not available at the time of this report.

7.5 National figures for 2011 estimated the average cost for minor incursions at £6,500 per site plus officer time. For major protracted incursions, like Oxen Lane North Curry, this figure rises to an average of £4.6 million. Costs for Dale Farm unauthorised encampment published by Basildon Council are £7 million, with additional Police cost of £2.4million.

8 Good Practice Managing Sites

8.1 Good management of a site requires knowledge of the different Gypsy & Travelling cultures and communities. Options include:

- a) do nothing,
- b) an onsite resident-manager/caretaker (free of charge pitch and nominal retainer),
- c) recruit an officer (c.£20000 including on costs - £4k per Council),
- d) tender for cost neutral site management (pre-tender then full tender process), this will likely be more cost effective if Somerset wide, Officers can explore interest for such a structure with Somerset Housing Officers Group, Home Space Sustainable Accommodation Community Interest Company and an affordable housing provider).

e) Researchers at De Montfort University looked at the problem of managing and delivering Gypsy and Traveller sites in 2016 and offered 12 key recommendations to housing bodies, local authorities and government agencies:

1. Recognise that site provision is the key to resolving continuous unauthorised encampments in an area.
2. Where sites are not already in existence, consider 'negotiated stopping', rather than eviction, as a more resource-efficient and humane approach to unauthorised encampments.
3. Understand unauthorised encampments and lack of permanent sites as housing issues reflecting unmet accommodation needs.
4. Have robust Gypsy and Traveller Accommodation Assessment data based on open channels of communication with residents.
5. Identify sites in Local Plans and consult with Gypsies, Travellers and other residents on location of sites.
6. Encourage elected members to play a key role in leading local debates on managing and delivering sites, supported through training and by national political leadership.
7. Recognise a duty to promote equality in this area; challenge discriminatory discourse about Gypsies and Travellers as part of this.
8. Plan for a mixture of tenure, size and location for new Gypsy and Traveller sites, as with general housing stock.
9. Bring in Gypsy and Traveller accommodation alongside other social housing, in terms of policies, administration and standards of management.
10. Recognise that a well-run site will not cost money in the long term (income can cover costs) but capital funding is needed initially to support delivery.
11. See information sharing as key to good management: inefficiencies occur when lines of accountability between departments and agencies are blurred.
12. Pay careful consideration to future management and ownership issues when undertaking reviews of local authority sites.

8.2 This research was based on interviews that took place with 122 G&T residents on 54 sites, as well as interviews with 95 public service professionals and local politicians across the UK to find out more about site delivery and management.

9 SWT Site Management Options:

Action	Pro's	Con's
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Do Nothing	No capital, maintenance or management costs of SWT owned site.	No provision: Identified GTAA need not met, High risk and costs of unauthorised encampments. No accommodation for homeless or emergency cases. Reputation risk with G&T community, press, general public, Planning Inspectorate. Risk of legal action under Equalities/Human Rights.
Onsite-manager/caretaker	Onsite 24/7 to provide security, manger residents and undertake minor repairs, likely to be member of Gypsy or Traveller community and know cultures.	May have issues with members of different cultural or ethnic group. SWT pay for retainer, maintenance materials, may undertakes significant maintenance repairs.
Employ Officer via a joint approach across other Councils	Development of in-house management expertise, oversee maintenance, coordinator and focus for all G&T matters. SWT retains rent receipts.	C. £30,000 incl. on-costs, SWT Officer – may be distrusted by community. SWT responsible for all management and maintenance of site.
Countywide or adjacent Districts management company.	Shared risk and cost, SWT retains a proportion of the rent receipts or this funds maintenance and management. Utilise existing management expertise in adjacent authorities.	Dealing with multiple Councils with differing priorities and resources, SWT responsible for a proportion of maintenance and management costs.
Tender for site management	Cost neutral solution for SWT, company responsible for all site management and maintenance.	May not be based in the Borough. May not get interest in running single Otterford B site.
Other options Specialist companies offer 3 options: 1. Managing sites on LA's behalf	Either of these options are on the face of it ideal given the lack of experience SWT has in managing G&T sites	To date only one company that provides this service is available.

2. Leasing sites (peppercorn) sites on their behalf 3. Developing the sites and leasing them		
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All options will have a cost implication in terms of the revenue account.

10 Relevant Legislation

- 10.1 The various Gypsy & Travellers communities are officially recognised as distinct ethnic group under the Race Relations Act.
- 10.2 SWT has a statutory duty regarding Gypsies, Travellers and Travelling Showpeople under Planning Policy for Travellers 2012 and Housing Act 2004 to; identify the accommodation need (transit and residential), set criteria-based policy to guide development, identify sites and provide appropriate accommodation for those presenting as homeless. Local Authorities may also be required, under Section 87 of the Local Government Act 2003 (as amended), to produce a strategy that addresses identified need.
- 10.3 The Housing Acts of 1977 and 1996, as well as the Homelessness Act 2002 and the Homeless Reduction Act 2017, placed statutory duties on local housing authorities to provide appropriate accommodation for those presenting as homeless. They are also required to ensure that advice and assistance available free of charge.
- 10.4 Under the Human Rights Act 1998 a Local Authority offering homeless Gypsy or Traveller people conventional housing accommodation if they had a strong “aversion to bricks and mortar”, may contravene their personal beliefs and cultural way of life. Serious weight should be given to the strength of the aversion and the local authority must see if they can facilitate the Gypsy way of life through serious and extensive consideration of land/pitches/sites in the area.
- 10.5 Some consideration has been given as to Court decisions sought by other UK local Authorities who have sought district wide injunctions preventing illegal encampments where they had a transit site in place. SWT’s Legal advice currently is that it would not be prudent for SWT to make an application for a “borough-wide” injunction prohibiting persons unknown from prohibiting unauthorised occupation on land owned or managed by the Somerset West and Taunton Council as it is unlikely to be successful given recent case law in Bromley.

11 Risk Management

- 11.1 Financial: SWT is at risk of unauthorised encampments, permitting development in undesirable locations and Planning by Appeal; with their associated costs. Actively addressing the need requirements also reduces the risk of discrimination and exposure to claims under European Court of Human Rights legislation. There is an unknown financial cost to the council of owning and managing a Transit Site.
- 11.2 Reputation: Media and public opinion is closely linked to the Councils ability to deal with any incursions. The Councils reputation at Planning Appeals and Legal Proceedings will be damaged if it has no access to public sites and cannot demonstrate it is addressing the identified need. The Council's reputation amongst the Gypsy & Travelling community is strongly linked to its handling of unauthorised encampments, inappropriate applications, human rights, homelessness and site provision. Inappropriate management of a site would damage the Councils reputation in the local media, with local residents and other local authorities.
- 11.3 Community Health: The Council is at risk of not being able to discharge its homelessness obligations and offer alternative accommodation to illegal encampments. Provision of sites is key in tackling issues of deprivation and ill health that are prominent within sections of the Gypsy & Travelling community. Established sites enable significantly better access to education and health services.

11.4 Risk Assessment

	Risk Description	Likelihood	Impact	Overall	Risk Mitigation Measures	Likelihood	Impact	Overall
i	Financial: SWT is at risk of unauthorised encampments, permitting development in undesirable locations and Planning by Appeal; with their associated costs.	4	4	16	<i>By providing a transit site the SWT have the ability to have illegal encampments moved on more quickly</i>	3	3	9
ii	Failure to actively addressing the need requirements of G&T groups increases the risk of discrimination claims and exposure to claims under European Court of Human Rights legislation	4	4	16	<i>By providing a transit site the SWT reduces this risk but does not eliminate it.</i>	3	3	9
iii	There is an unknown financial cost to the council of owning and managing a Transit Site.	3	3	9	<i>A procurement exercise will be carried out to ensure best value and to secure a company to manage the site.</i>	2	2	4
iv	Reputation: Media and public opinion is closely linked to the Councils ability to deal with any incursions. The Councils reputation at Planning Appeals and Legal Proceedings will be damaged if it has no access to public sites and cannot demonstrate it is addressing the identified need.	3	3	9	<i>By providing a transit site the SWT reduces this risk but does not eliminate it.</i>	3	3	9

	Risk Description	Likelihood	Impact	Overall	Risk Mitigation Measures	Likelihood	Impact	Overall
v	The Council's reputation amongst the Gypsy & Travelling community is strongly linked to its handling of unauthorised encampments, inappropriate applications, human rights, homelessness and site provision. Inappropriate management of a site would damage the Councils reputation in the local media, with local residents and other local authorities	3	3	9	<i>By providing a transit site the SWT reduces this risk but does not eliminate it.</i>	3	3	9
vi	Community Health: The Council is at risk of not being able to discharge its homelessness obligations and offer alternative accommodation to illegal encampments. Provision of sites is key in tackling issues of deprivation and ill health that are prominent within sections of the Gypsy & Travelling community. Established sites enable significantly better access to education and health services.	3	3	9	<i>By providing a transit site the SWT reduces this risk but does not eliminate it.</i>	3	3	9
	Mean score	5	5	68 /5 = 13 .6				

All investment carries risk which we assess as an average score of 5 using the convention of Likelihood x average impact i.e. $(68/6) / \text{number of risks} = 13.6$ i.e. med

12 Due Diligence

12.1 All purchases of this nature will require due diligence to be undertaken as follows:

- Red Book Valuation
- Site Inspection
- Title search
- Assessment of the current lease
- Schedule of condition
- Pre-Acquisition survey
 - health and safety file;
 - licences for alterations;
 - planning approvals;
 - listed building or conservation area status;
 - building control approvals and completion certificates;
 - contamination
 - access audits;
- Any restrictive covenants or legal constraints associated with the site (e.g. sterilised wayleaves, charges on the asset by third parties etc.)

13 Links to the New Corporate Strategy

- Reduce anti-social behaviour, through working with residents and our partners as well as tackle economic, social and health inequalities within the groups and communities that need extra support.
- Work to end homelessness and rough sleeping in the District.

14 Conclusion

14.1 SWT has the opportunity to purchase the County Council owned Otterford B Gypsy Transit Site near Culmhead in the Parish of Otterford The site would serve a significant planning function; both as a deterrent to and option available for dealing with unauthorised encampments. There is an identified need for Transit pitches. However some improvements are required for the site to meet Government guidance on standards for transit sites, however these could be phased as required. Capital is available and there is the opportunity to source future grant funding.

14.2 The Council has no in house management expertise to run a site. Options could include an onsite manager/caretaker, employing an Officer directly or working with a Community Interest or Management Company. A partnership arrangement with an adjacent authority, housing association or other body is a preferred solution. Longer term there may be potential for a countywide management company to be formed between adjacent Districts. There exists an opportunity and use rent receipts to cover site maintenance and management.

- 14.3 The recommendation to purchase the site at Otterford B is not a panacea – it is only part of a blended solution which will involve further liaison with the travelling community and the potential acquisition of permanent traveller’s sites across Somerset in conjunction with other local authorities.

15 Finance / Resource Implications

- 15.1 There is an existing capital budget for this project, which will be financed from an existing reserve as part of the capital expenditure programme.
- 15.2 A recurring revenue cost is likely to be incurred depending on the management solution agreed upon, which is still being determined and will be included in the annual budget setting process.

16 Legal Implications

- 16.1 These are set out in the report at section 6.1

17 Environmental Impact Implications

- 17.1 None directly related to this report.

18 Safeguarding and/or Community Safety Implications

- 18.1 None related directly to this report.

19 Equality and Diversity Implications

- 19.1 These are set out in the report

20 Social Value Implications

- 20.1 At this stage we have not carried out a detailed analysis in this area.

21 Partnership Implications

- 21.1 None related directly to this report.

22 Health and Wellbeing Implications

- 22.1 No known implications in this report.

23 Asset Management Implications

This will depend upon the management option chosen.

24 Consultation Implications

25 Scrutiny Comments / Recommendation

Democratic Path-:

- Executive 22-01-20
- Full Council 26-02-20

Reporting Frequency: Once only

List of Appendices

Appendix 1 Otterford Parish Council view submitted to SWT

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