

Central Bedfordshire
Council
Priory House
Monks Walk
Chicksands,
Shefford SG17 5TQ



please ask for Sandra Hobbs
direct line 0300 300 5257
date 9 January 2014

NOTICE OF MEETING

SPECIAL EXECUTIVE

Date & Time

Tuesday, 21 January 2014 at 2.00 p.m.

Venue

Council Chamber, Priory House, Monks Walk, Shefford

Richard Carr
Chief Executive

To: The Chairman and Members of the EXECUTIVE:

Cllrs	J Jamieson	– Chairman and Leader of the Council
	M Jones	– Deputy Leader and Executive Member for Corporate Resources
	M Versallion	– Executive Member for Children's Services
	C Hegley	– Executive Member for Social Care, Health and Housing
	N Young	– Executive Member for Sustainable Communities – Strategic Planning and Economic Development
	B Spurr	– Executive Member for Sustainable Communities – Services
	Mrs P Turner MBE	– Executive Member – Partnerships
	R Stay	– Executive Member – External Affairs

All other Members of the Council - on request

MEMBERS OF THE PRESS AND PUBLIC ARE WELCOME TO ATTEND THIS MEETING

Please keep this Agenda as it may be referred to at Council on 30 January 2014.

AGENDA

1. **Apologies for Absence**

To receive apologies for absence.

2. **Members' Interests**

To receive from Members any declarations of interest.

3. **Chairman's Announcements**

To receive any matters of communication from the Chairman.

4. **Petitions**

To consider petitions received in accordance with the Scheme of Public Participation set out in Annex 2 of Part A4 of the Constitution.

5. **Public Participation**

To respond to general questions and statements from members of the public in accordance with the Scheme of Public Participation set out in Appendix A of Part A4 of the Constitution.

Decisions

Item	Subject	Page Nos.
6.	Gypsy and Traveller Local Plan The report sets out the findings of the Gypsy, Traveller Accommodation Assessment 2014 (GTAA) and proposes changes to the draft Gypsy and Traveller Local Plan following the Pre-Submission Public Consultation.	3 - 334

Meeting: Executive
Date: 21 January 2014
Subject: Gypsy and Traveller Local Plan
Report of: Cllr Nigel Young, Executive Member for Sustainable Communities – Strategic Planning and Economic Development

Summary: The report sets out the findings of the Gypsy, Traveller Accommodation Assessment 2014 (GTAA) and proposes changes to the draft Gypsy and Traveller Local Plan following the Pre-Submission Public Consultation. Executive is asked to approve changes to the Plan and recommend that Council agree the document for the purposes of Publication and Submission to the Secretary of State. Executive is asked specifically to consider the options set out in the report for responding to the new GTAA and issues raised during the pre-submission consultation and approve the most suitable sites to meet the pitch requirement to 2031.

Advising Officer: Trevor Saunders, Assistant Director (Planning)
Contact Officer: Richard Fox, Head of Development Planning and Housing Strategy
Public/Exempt: Public
Wards Affected: All
Function of: Council
Key Decision No
Reason for urgency/ exemption from call-in (if appropriate) N/A

CORPORATE IMPLICATIONS	
Council Priorities:	
1.	The Gypsy and Traveller Local Plan will contribute to the Council's priority of enhancing Central Bedfordshire. Specifically, the Local Plan will help the Council to ensure the housing needs of the whole community (including the needs of the Gypsy and Traveller community) are met, while protecting the countryside and securing appropriate supporting infrastructure.

Financial:

2. The Gypsy and Traveller Plan is intended to provide for local Gypsy and Traveller pitch need. Having a robust strategy in place helps reduce the incidences of unauthorised encampments which create a financial burden on the authority. In turn, a robust strategy will assist in the determination of planning applications and potentially reduce the costs of defending planning applications on appeal. The cost of the Plan can be met from within existing resources.

Legal:

3. The Gypsy and Traveller Local Plan, when adopted, will be part of the statutory development plan for the area.

Risk Management:

4. The following risks have been identified:

- Failure to discharge statutory responsibilities.
- Reputational risks associated with the failure to address the needs of Gypsies and Travellers and the local community.
- Financial risks associated with unauthorised encampments.
- Risk of challenge and appeals.
- Risk of inaccurate forecasting of requirements.
- Failure to control unauthorised camping.
- Failure to support a sound Development Strategy.

These risks have been identified and appropriate mitigating action will be taken.

Staffing (including Trades Unions):

5. Not Applicable.

Equalities/Human Rights:

6. Under the Equality Act, public authorities have a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
7. In drawing up the Gypsy and Traveller Plan an Equality Impact Assessment is being undertaken. This is highlighting the specific needs and interests of Gypsy and Traveller communities who are at a significantly greater risk of lower quality of life outcomes.

8. Gypsies and Travellers can sometimes find themselves in a cycle of 'enforced' nomadism, being continually moved on by the authorities because of the shortage of authorised sites. As a result, Gypsies and Travellers are often more disadvantaged than any other ethnic group in terms of access to healthcare and education. The lack of authorised public sites and the difficulties associated with getting planning permission for private sites, has meant that Gypsies and Travellers have set up home on land belonging to others or on their own land without permission.
9. Approval of the Plan could help to address achievement and health inequalities, reduce racial tensions associated with unauthorised sites, increase the participation of Gypsy and Traveller communities in decision making and service delivery processes and increase a sense of belonging.
10. The Equality and Human Rights Commission has recently published a Human Rights Review which highlights that the human rights of some groups are not always fully protected by public authorities. The Commission has highlighted that there continues to be a lack of appropriate accommodation for Gypsies and Travellers and that this may be in contravention of Article 8 of the Human Rights Act.
11. Article 8 does not impose an obligation on public authorities to provide homes for anybody, or to provide sites for Gypsies and Travellers. It does, however, oblige authorities to respect the home. This applies particularly in situations where local authorities wish to evict people from their homes. Due to a long term lack of authorised sites, Gypsies and Travellers often have no choice other than to live in unauthorised sites. This increases the likelihood that they will face eviction.
12. The review shows that:
 - To date, the courts have not found a breach of Article 8 in relation to an eviction from an unauthorised Gypsy and Traveller site. However, there may be grounds for challenging this precedent.
 - There continues to be a shortage of authorised Gypsy and Traveller sites, increasing the likelihood of further forced evictions from unauthorised sites. The European Court has recognised that there needs to be special consideration given to the needs and different lifestyle of Gypsies and Travellers in the context of planning decisions, and the Commission expects to see further consideration of this issue over the coming years.
 - The Commission recently reviewed the progress made by local authorities in England and Wales in meeting their targets for site provision under the planning system in force up to 2010. The report indicated that there has been some progress in making legal sites available for Gypsies and Travellers in England, as there were 15 per cent more pitches available in 2009 than there were in 2006. The report estimated that an additional 5,821 residential pitches were required in England in the first five years after a local needs assessment was completed.

- There is evidence that the planning system may not be fair towards Gypsies and Travellers. Department for Communities and Local Government figures from April 2009 to December 2010 show that only half of applications for new sites are successful in England, compared with around 70 per cent of residential applications. The Commission's report attributes this low success rate to very few local authorities having identified suitable land for site development, which means that 'plan-led' development cannot operate in the same way as for residential applicants. In addition, the survey of local authorities carried out for the Commission report showed that between 2006 and 2009, 40 per cent of the applications for new sites in England were granted only on appeal, and half of the 'successful' applications for new sites only received temporary permissions.

13. It is important that only relevant planning matters are taken into account as part of this process. In accordance with the Equality Act 2010 consultation responses containing discriminatory remarks on the grounds of age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation will be treated as unlawful and will not be considered or disclosed.

Public Health:

14. Gypsies and Travellers experience significantly worse health outcomes compared to the settled community. Although they have the same illnesses and problems as the general population, their life expectancy is poorer across age ranges than the settled population; for example, it is 10-12 years less than the UK life expectancy of 82 years. Levels of prenatal mortality, still births and infant mortality in Gypsy and Traveller communities are significantly higher than the national average. Gypsy and Traveller mothers are 20 times more likely to have experienced the death of a child than the rest of the population. Gypsies and Travellers experience significant barriers accessing health and social care services, and these have implications for continuity of care as well as primary health care needs. The factors are complex, but include, poor literacy skills, fear, competing priorities, enforced mobility, transport, poor time keeping, inflexible systems, discrimination, marginalisation, lack of trust and low expectations on the part of service providers and users. These are reinforced by the different beliefs, attitudes and cultures of Gypsy and Traveller communities and professionals.

Community Safety:

15. Section 17 of the Crime and Disorder Act 1998 sets out the Councils responsibility to do all that it reasonably can to prevent crime and disorder in its area. There is no specific provision within the criteria for assessing suitability of proposed sites to consider community safety issues. The Council is required to consider community safety across all of its functions and it will be necessary, as suitable sites are identified, to engage with the Council's Community Safety Team and key stakeholders such as Bedfordshire Police to assess what, if any, community safety implications there may be with a view to mitigating or resolving concerns.

Sustainability:

16. Central Bedfordshire Council embraces sustainable development as its overarching aim and has and Local Plans will continue to be subject to a sustainability appraisal.

Procurement:

17. ORS conducted the GTAA. ORS were commissioned in accordance with the procurement rules of Central Bedfordshire.

Overview and Scrutiny:

18. The issues in this report will be considered by the Sustainable Communities Overview and Scrutiny Committee on 14 January 2014. This report will be updated following the outcome of that meeting.

RECOMMENDATIONS:

The Executive is asked to:

1. **endorse the new Gypsy, Traveller and Showperson Accommodation Assessment 2014 conducted by ORS;**
2. **approve the total number of pitches and plots for allocation in the Gypsy and Traveller Local Plan up to 2031;**
3. **approve the recommended changes to the draft Gypsy and Traveller Local Plan attached at Appendix D and recommend that Council agree the document for the purposes of Publication and Submission to the Secretary of State;**
4. **confirm the sites to meet the pitch requirement for Gypsy and Travellers and plot requirement for Travelling Showpeople to 2031 as recommended by the Overview and Scrutiny Committee; and**
5. **recommend that Council delegate authority to the Chief Executive, in consultation with the Executive Member for Sustainable Communities – Strategic Planning and Economic Development, to make any minor amendments to the Gypsy and Traveller Local Plan:**
 - (i) **prior to Publication;**
 - (ii) **after Publication but before Submission; and**
 - (iii) **during the Examination process.**

Reason for Recommendations: To enable progress on the draft Gypsy and Traveller Local Plan prior to its formal submission to the Secretary of State in June 2014 and during the Examination period.

Executive Summary

19. Local authorities are required to assess the accommodation needs of the Gypsies and Travellers and Travelling Showpeople, alongside the settled population, and to develop a Local Plan that addresses any identified unmet need. This report sets out the findings of the new Gypsy, Traveller and Travelling Showperson Accommodation Assessment 2014 (GTAA) and outlines potential changes to the Pre-Submission Gypsy and Traveller Local Plan in light of both the new GTAA and issues raised during the Pre-submission Public Consultation. The Executive is asked to approve changes to the Plan and recommend that Council agree the document for the purposes of Publication and Submission to the Secretary of State. The Executive is asked specifically to consider the sites selected in the draft Plan in the light of the new GTAA and issues raised during the pre-submission consultation and approve the most suitable sites to meet the pitch requirement to 2031.

Background

20. Local authorities are required through the Housing Act 2004, to assess the local accommodation needs of Gypsies and Travellers alongside the settled population. Local authorities are also required by the Act to develop a strategy that addresses any unmet need which is identified by that assessment.
21. On 4 October 2011, the Executive supported the principle of preparing a Central Bedfordshire-wide Gypsy and Traveller Local Plan to deliver the combined pitch requirements identified at that time, for both the northern and southern parts of Central Bedfordshire.
22. Government policy contained within Planning Policy for Traveller Sites (PPTS) (March 2012) states that local planning authorities should:
 - identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
 - identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible; and
 - identify a supply of specific, developable sites or broad locations for years eleven to fifteen.

If the Council fails to identify a five year land supply for traveller sites, applications considered to be inappropriate by the Council are likely to be granted at appeal and unauthorised camping is likely to continue.

23. There are significant problems associated with unauthorised sites such as the costs of enforcement action, the tension that exists between Gypsies and Travellers and the settled community and the social exclusion experienced by Gypsies and Travellers on unauthorised sites. It is therefore essential that the Council allocates sufficient sites in the Gypsy and Traveller Local Plan to meet the identified pitch requirement.

24. There is further reason for producing the Plan. There is a clear linkage between the Development Strategy for Central Bedfordshire and the production of the Gypsy and Traveller Local Plan. Whilst it is not contrary to Government policy to produce a separate plan for gypsies and travellers, Government Inspectors have made it clear that plans such as the Development Strategy can only be found sound if it can be demonstrated that the local authority has a clear and genuine commitment to the accommodation of gypsy and traveller needs through the action it takes in preparing its Local Plan.
25. Like the emerging Development Strategy, the Gypsy and Traveller Local Plan must pass the test of 'soundness', which means that it must be prepared correctly and be the most appropriate strategy for Central Bedfordshire, when compared against alternatives. The Executive must consider this test when determining its response to the needs assessment. The Gypsy and Traveller Local Plan will be examined against 4 tests of soundness:
1. **Positively prepared:** the Plan should meet identified local needs, including unmet requirements from neighbouring local authorities where reasonable to do so;
 2. **Justified:** the Plan should be the most appropriate strategy, when considered against reasonable alternatives;
 3. **Effective:** the Plan should be deliverable and be based on effective joint working on cross-boundary issues. The 'Duty to Cooperate' has been introduced and required the Council to work with neighbouring local authorities and other public bodies, such as the Environment Agency, on strategic cross-boundary issues; and
 4. **Consistent with national planning policy:** the Plan should be consistent with the National Planning Policy Framework (NPPF) and Planning policy for traveller sites (PPTS).

Gypsy and Traveller Pitch Requirement

26. PPTS states that local authorities should use a locally derived, robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
27. In December 2012, POS Enterprises conducted a review of the 2006 Gypsy and Traveller Accommodation Assessment (GTAA) to determine whether it was a suitable evidence base for the Gypsy and Traveller Local Plan. As the national planning policy context had changed significantly since 2006, POS recommended that a new full GTAA be conducted to provide a robust and up-to-date evidence base for the local plan. However, POS acknowledged a full GTAA would delay progress on the local plan, therefore, in the interests of expediency; POS suggested the Council undertake a partial GTAA to confirm pitch requirements.
28. This recommendation was endorsed by the Sustainable Communities Overview and Scrutiny Committee on 17 January 2013 and Opinion Research Services (ORS) were commissioned to conduct a Gypsy, Traveller and Travelling Showperson Accommodation Assessment Update (GTAA).

29. The GTAA Update and the draft Gypsy and Traveller Local Plan were presented to the Sustainable Communities Overview and Scrutiny Committee on 28 February 2013. The Executive and Full Council subsequently approved the total number of pitches for allocation in the Plan as recommended by the GTAA and approved the draft Plan for publication. A six week pre-submission public consultation then followed.

A number of issues were raised during the public consultation requiring the Council to consider making changes to the Local Plan before it is submitted to the Secretary of State. Considering the feedback received to the published Plan and the need to publish any significant changes to the Plan for a further full round of public consultation before submitting the final version to the Secretary of State, has added about 9 months to the plan-making process.

30. In light of this and in consultation with the Executive Member, officers have taken the opportunity to further enhance the Plan's evidence base by undertaking a full GTAA. ORS were commissioned in line with the Council's procurement procedures, to undertake a full revised GTAA.

The Outcome of the Revised Gypsy, Traveller and Showperson Accommodation Assessment 2014

31. The Gypsy, Traveller and Showperson Accommodation Assessment 2014 conducted by ORS (Appendix A), identified a need for 165 additional permanent Gypsy and Traveller pitches in Central Bedfordshire between 2014 and 2031 using a 2.5% compound growth rate. In the first period (2014-2019) 63 pitches are required to address the backlog of need and household growth. The remaining 102 pitches are required to meet future household growth from 2020 to 2031.

32. Table 1: Pitch Requirement at January 2014

Number of pitches in Central Bedfordshire in 2014	247
Pitch need from 2014 to 2019 (to meet backlog)	35
Growth between 2014 and 2019 (2.5%)	28
Growth between 2020 and 2024 (2.5%)	39
Growth between 2025 and 2029 (2.5%)	44
Growth between 2030 and 2031 (2.5%)	19
Total need to 2031	165

33. Given a projected growth in the national population of around 1.5% per annum, ORS favour a pragmatic approach to household formation rates and typically use compound growth values between 2% and 2.5% depending upon local circumstances. In this case, ORS based their overall figures on a 2.5% per annum compound growth rate, but would note that much of the recent delivery of pitches in Central Bedfordshire has been to address the expansion of family owned sites, thus allowing formations to occur.

The estimated extra site provision that is required until 2031 using a 2.5% per annum compound growth rate is 165 pitches. Including the 45 pitches granted planning permission in 2013 this would see the number of authorised pitches rise by 210 in 19 years to 2031 which is a figure of 112%, at the same times as housing figures are projected to rise by less than 25%. If Central Bedfordshire wished to consider using a 3% compound growth rate, this figure would rise by 36 pitches and if they wished to use a 2% per annum growth rate, the figure would fall by 34 pitches. The Executive may wish to consider using a lower compound growth rate to determine pitch requirements. However, this is not advised by Officers.

Table 2 outlines the different number of pitches required when using different compound growth rates between 1.5% and 3%.

34. Table 2: Extra Pitches Required in Central Bedfordshire from 2014-2031 using different Compound Growth Rates

Growth rate per annum	2014-2019	2020-2024	2025-2029	2030-2031	Total
1.5%	46	22	23	10	100
1.75%	50	26	28	12	115
2%	54	30	33	14	131
2.25%	58	34	38	17	148
2.5%	63	39	44	19	165
2.75%	67	44	50	22	183
3%	71	48	56	25	201
Please note numbers may not sum due to rounding					

35. On the basis of practical experience, decisions taken by the Planning Inspectorate on appeal and to ensure the most likely prospect of the Plan being found sound at Examination, officers' recommend that a 2.5% compound growth rate is utilised.

Travelling Showpeople Plot Requirement

36. The Gypsy, Traveller and Showperson Accommodation Assessment Update 2013 conducted by ORS (Appendix A), found a need for 25 additional permanent plots for Travelling Showpeople in Central Bedfordshire between 2014 and 2031. In the first period (2014-2019), 15 plots are required to address backlog and household growth. The remaining 10 plots are required to meet future household growth from 2020 to 2031.

37. Table 3 Pitch Requirement for Travelling Showpeople to 2031

Number of pitches in Central Bedfordshire in 2014	43
Pitch need from 2014 to 2019 (to meet backlog)	11
Growth between 2014 and 2019 (2.5%)	4
Growth between 2020 and 2024 (2.5%)	4
Growth between 2025 and 2029 (2.5%)	4
Growth between 2030 and 2031 (2.5%)	2
Total need to 2031	25

38. As explained in the background, PPTS requires local planning authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets; to identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, to identify a supply of specific, developable sites or broad locations for growth for years eleven to fifteen. However, officers recommend that the Council allocates sufficient pitches to 2031, to bring the Gypsy and Traveller Local Plan in line with the timeframe for the Development Strategy because the Plan is unlikely to be adopted before 2015. As an alternative course, the Executive could recommend reducing the Plan period to 2029, which would reduce the Gypsy and Traveller pitch requirement and reduce the Travelling Showperson plot requirement.

Response to New GTAA 2014 and Requirement for Additional Pitches

39. The current draft Plan allocates 66 pitches for Gypsies and Travellers and 4 plots for Travelling Showpeople. Should the Council adopt the 2.5% growth rate for Gypsies and Travellers and the higher level of need for Travelling Showpeople as identified in the new GTAA 2014, additional Gypsy and Traveller pitches and Travelling Showpeople plots must be allocated. 165 pitches are needed to meet the accommodation needs of the Gypsy and Traveller community to 2031. As 66 pitches are allocated in the Plan, 99 additional pitches are now required to meet the need identified in the GTAA 2014. Twenty five plots are needed to meet the accommodation needs of Travelling Showpeople to 2031. As 4 plots are allocated in the Plan an additional 21 plots must now be allocated.
40. In order to comply with the PPTS, sites must be identified for a minimum of ten years. The GTAA 2014 (using a 2.5% compound growth rate) identified a need for 102 pitches for Gypsies and Travellers and 19 plots for Travelling Showpeople from 2014-2024.

41. Regardless of the compound growth rate agreed, there are a number of ways in which the Council may seek to address the Gypsy and Traveller and Travelling Showperson accommodation need:

Option 1: Reconsider all sites at Stage 3 of the Site Assessment and allocate sufficient pitches to meet the need up to 2031. This can be achieved either through the allocation of additional sites or by adding additional pitches to the existing allocations. Officers consider this the least risk option. This option would demonstrate to the Planning Inspectorate at examination that the local authority has a clear and genuine commitment to the accommodation of Gypsy and Traveller needs through the action it is taking in preparing its Local Plan, consequently this option is more likely to result in the Plan being found sound.

Option 2: Consider how sites can be brought forward outside the Plan making process. The Gypsy and Traveller Pitch and Travelling Showpeople Plot trajectory allowed for a number 'windfall' pitches to be delivered over the Plan period. 'Windfall' sites are sites that come forward outside of the plan-making process but receive planning permission. Historically windfall sites have represented the majority of pitch delivery in Central Bedfordshire. However, whilst it is reasonable to assume that additional sites, such as infill sites or extensions to existing sites will continue to emerge, the Council would be unwise to rely on a high level of windfall provision going forward, unless it is prepared to permit the majority of unauthorised sites as they arise in future.

Furthermore, PPTS requires local planning authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. Therefore, as windfall sites relate to applications that are currently unknown, the Council cannot rely on windfall provision over the first five year period of the Plan and needs to allocate sufficient pitches to meet the accommodation need up to 2019.

42. The Executive is asked to endorse the content of the GTAA 2014 and approve the total number of pitches for allocation in the Gypsy and Traveller Local Plan up to 2031.

Consultation Results: Site Specific Changes

43. As noted, the Pre-Submission Plan (Appendix C) allocated 66 pitches for Gypsies and Travellers across 7 sites in Central Bedfordshire. A number of issues were raised in relation to the allocation of these sites. The Executive is asked to consider the issues and officer responses documented in Part 2 of the Key Issues Table (Appendix D) and make changes to the Plan in line with officer's responses, which can then be published for consultation.

44. A specific issue raised during the Pre-Submission consultation was the lack of clarity regarding the rationale for site selection. On 14 January the Sustainable Communities Overview and Scrutiny Committee specifically considered each site that reached 'Stage 3' of the Site Assessment process (Appendix E), confirmed the sites selected for allocation and clarified why these sites are the most suitable.

Consultation Results: Changes to Draft Policies

45. The Pre-submission Gypsy and Traveller Local Plan May 2013 (Appendix C) set out how the Council would help to meet the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities identified in the previous GTAA.
46. The Pre-Submission Plan (Appendix C) outlined policies relating to pitch requirement for Gypsies and Travellers, plot requirement for Travelling Showpeople, provision for visitor space, transit pitches and business use, and identified how future planning applications for pitches/plots would be determined.
47. Representations received during the pre-submission consultation on the Pre-Submission Plan raised a number of issues in relation to the general policies proposed within the Plan. Part 1 of the Key Issues Table (Appendix D) documents these issues and officers' responses.
48. The Executive is asked to make changes to the Plan in line with officer's responses set out in the Key Issues Table. The amended Plan can then be published for further consultation.

Next Steps

49. With the approval of Executive, the Plan will be considered by Full Council on 30 January for final approval for publication.
50. If approved by Full Council, the amended Pre-Submission Gypsy and Traveller Local Plan will be published in February. A six week formal consultation period will follow in which all interested parties will have the opportunity to submit representations. All representations will be considered by the Council and any necessary minor amendments will be made to the Gypsy and Traveller Local Plan before the document is formally submitted to the Secretary of State for examination.
51. The Gypsy and Traveller Local Plan, supporting evidence and all representations received will be submitted to the Secretary of State in June 2014. An independent Planning Inspector will then be appointed by the Secretary of State, and their role will be to determine whether the document is 'sound' and legally compliant.
52. An Examination in Public will be held in Autumn 2014. Individuals who have made objections to the document in the formal consultations will be able to attend the hearing sessions to have their argument heard by the Planning Inspector. For those who do not wish to attend the hearing sessions, the Planning Inspector will still consider their written comments, which will carry the same weight as those points raised in person at the examination hearings.

53. Finally, The Planning Inspector will issue a report setting out their conclusions from the public examination. This will identify whether the document is 'sound' and any changes that are required to the Plan. If the Plan is considered to be 'sound', the Council will then adopt the Gypsy and Traveller Local Plan.

Key Dates

54. Table 3: Gypsy and Traveller Local Plan Next Steps

Full Council	30 January 2014
Public consultation	February-March 2014
Submission to the Secretary of State	June 2014
Examination	September 2014
Inspectors Report	December 2014
Adoption	March 2015

Appendices:

- Appendix A - ORS Central Bedfordshire Council Gypsy, Traveller and Showperson Accommodation Assessment 2014
- Appendix B - Household Formation Rates for Gypsies and Travellers Technical Note November 2013
- Appendix C - Gypsy and Traveller Local Plan Pre-submission (May 2013)
- Appendix D - Key Issues Table
- Appendix E - Gypsy and Traveller Local Plan Site Assessment

Background papers and their location: (open to public inspection)

Executive report (04 October 2011) titled "A new plan making programme for Central Bedfordshire" (available on the internet – <http://mod.gov.cbc.int:9070/ieListDocuments.aspx?CId=577&MId=3717&Ver=4>)

National Planning Policy Framework (March 2012) (available on the internet- https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

Planning Policy for Traveller Sites (March 2012) (available on the internet - (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6078/2113371.pdf))

Report to Sustainable Communities Overview and Scrutiny Committee on (10 April 2012), Item 9: Gypsy and Traveller Plan: Pitch Numbers and Site Assessment Methodology (available on the internet -

<http://www.centralbedfordshire.gov.uk/modgov/documents/s35329/Item%2009%20-%20Gypsy%20and%20Traveller%20plan%20pitch%20numbers%20and%20site%20assessment%20methodology.pdf>)

Report to Sustainable Communities Overview and Scrutiny Committee on (17 January 2013), Item 10: Gypsy and Traveller Local Plan: GTAA Review (available on the internet <http://www.centralbedfordshire.gov.uk/modgov/documents/s39547/Gypsy%20and%20Traveller%20Local%20Plan%20report.pdf>)

Report to Sustainable Communities Overview and Scrutiny Committee on (28 February 2013), Item 9: Gypsy and Traveller Local Plan (available on the internet <http://www.centralbedfordshire.gov.uk/modgov/documents/g4150/Public%20reports%20pack%20Thursday%2028-Feb-2013%2010.00%20SUSTAINABLE%20COMMUNITIES%20OVERVIEW%20SCRUTINY%20COMMIT.pdf?T=10>)

Report to Executive Committee on (18 March 2013), Item 8: Gypsy and Traveller Local Plan (available on the internet <http://www.centralbedfordshire.gov.uk/modgov/documents/g4081/Public%20reports%20pack%20Monday%2018-Mar-2013%2013.00%20EXECUTIVE.pdf?T=10>)

Recommendations from Executive to Council on (18 April 2013), (available on the internet <http://www.centralbedfordshire.gov.uk/modgov/documents/g4088/Public%20reports%20pack%20Thursday%2018-Apr-2013%2018.30%20CENTRAL%20BEDFORDSHIRE%20COUNCIL.pdf?T=10>)



CENTRAL BEDFORDSHIRE COUNCIL GYPSY, TRAVELLER AND SHOWPERSON ACCOMMODATION ASSESSMENT



January 2014



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1. Introduction

The Survey

- 1.1 Opinion Research Services (ORS) were commissioned by Central Bedfordshire Council to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.
- 1.2 The study seeks to provide an evidence base to enable the authority to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. The main objective of this study is to provide the Council with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Central Bedfordshire in the 18 year period until 2031 in sections covering 2014-2019, 2020-2024 and 2025-2029 and 2030-2031. The Central Bedfordshire Local Plan is due to commence in 2015 and hence the first period of 2014-2019 is for 6 years which covers both the remainder of the pre-plan year of 2014 and first five years of the plan. Any pitches delivered in the remainder of 2014 can be considered to count towards those required over the plan period.
- 1.3 We would note at the outset that the study covers the needs of Gypsies, Irish Travellers, New Travellers and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.

Definitions

- 1.4 For the purposes of the planning system, Gypsies and Travellers means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such. (Planning Policy for Traveller Sites, CLG, March 2012).
- 1.5 Within the main definition of Gypsies and Travellers, there are a number of main cultural groups which include:
 - » Romany Gypsies;
 - » Irish Travellers;
 - » New Travellers.
- 1.6 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010.
- 1.7 Alongside Gypsies and Travellers, a further group to be considered are Travelling Showpeople. They are defined as:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their family's or dependent's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller Sites, CLG, March 2012).

Legislation and Guidance for Gypsies and Travellers

1.8 Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following pieces of legislation and guidance are relevant when constructing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » Planning Policy for Traveller Sites 2012;
- » National Planning Policy Framework 2012;
- » Gypsy and Traveller Accommodation Needs Assessments Guidance October 2007;
- » The Human Rights Act 1998, when making decisions and welfare assessments;
- » The Town and Country Planning Act 1990 (as subsequently amended);
- » Homelessness Legislation and Allocation Policies;
- » Criminal Justice and Public Order Act 1994 (sections 61, 62, 77 and 78);
- » Anti-social behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour);
- » Planning and Compulsory Purchase Act 2004;
- » Housing Act 2004 which requires local housing authorities to assess the accommodation needs of Gypsies and Travellers and Showpeople and meet any identified unmet need
- » Housing Act 1996 in respect of homelessness.

Planning Policy for Traveller Sites

1.9 The document 'Planning Policy for Traveller Sites' which came into force in March 2012 sets out the direction of government policy. Among other objectives, the new policy's aims in respect of Traveller sites are (Planning Policy for Traveller Sites Page 1-2):

- » local planning authorities should make their own assessment of need for the purposes of planning;
- » to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- » to encourage local planning authorities to plan for sites over a reasonable timescale;
- » that plan-making and decision-taking should protect Green Belt from inappropriate development;
- » to promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites;

- » that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
- » for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
- » to increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- » to reduce tensions between settled and Traveller communities in plan-making and planning decisions;
- » to enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure;
- » for local planning authorities to have due regard to the protection of local amenity and local environment.

^{1.10} In practice the document states that (Planning Policy for Traveller Sites Page 3):

Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

^{1.11} Local planning authorities should, in producing their Local Plan:

- » identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
- » identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;
- » consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- » 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.

Tackling Inequalities for Gypsy and Traveller Communities

^{1.12} In April 2012 the government issued a further document relating to Gypsies and Travellers in the form of 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers' (CLG April 2012).

^{1.13} The aforementioned report contains 28 commitments to help improve the circumstances and outcomes for Gypsies and Travellers across a range of areas including:

- » Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children;
- » Identifying ways to improve health outcomes for Gypsies and Travellers within the proposed new structures of the NHS;
- » Encouraging appropriate site provision; building on £60m Traveller Pitch Funding and New Homes Bonus incentives;
- » Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system;
- » Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities and working with the financial services industry to improve access to financial products and services;
- » Sharing good practice in engagement between Gypsies and Travellers and public service providers.

Methodology

^{1.14} This section sets out the methodology we have followed to deliver the outputs for this study. Over the past 10 years ORS have developed a methodology which provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment and this has been updated in light of Planning Policy for Traveller Sites.

^{1.15} The stages below provide a summary of the process undertaken by ORS, with more information on each stage provided in the appropriate section of the report.

Stage 1: Background

^{1.16} At the outset of the project we sought to understand the background to the Gypsy, Traveller and Travelling Showpeople population in Central Bedfordshire. The study sought to identify the location of all known sites in the study area and the number of pitches or plots on each one. The study also gathered information from recent caravan counts and information held on unauthorised encampments in each area and also those who have expressed an interest in public pitches.

Stage 2: Household Survey

^{1.17} The research methodology for identifying the housing needs of Gypsies, Travellers and Travelling Showpeople adopted in this report was largely based upon face to face interviews with Gypsies, Travellers and Travelling Showpeople across Central Bedfordshire. We sought to undertake a census of Gypsy, Traveller and Travelling Showpeople households in November 2013. Interviews were sought with every known Gypsy, Traveller and Travelling Showpeople household present during this time. Though only one member of each household was interviewed, the survey questions cover other members of the same household. We would note that a single Traveller household may occupy several caravans.

Stage 3: Stakeholder Engagement

^{1.18} This study includes extensive stakeholder engagement with council officers and elected members from Central Bedfordshire, and neighbouring Local Authorities and other stakeholders. The aim of this

engagement was to help understand the current situation in the study area, particularly in relation households not on known existing sites, and also to discuss Duty to Cooperate issues with neighbouring Local Authorities, and any issues regarding education, health and community cohesion.

Stage 4: Future Pitch and Plot Requirements

- ^{1.19} The methodology used by ORS to calculate future pitch and plot requirements has been developed over the past 10 years and has drawn on lessons from both traditional housing needs assessments and also best and worst practice from Gypsy, Traveller and Travelling Showpeople Accommodation Assessments conducted across the country.
- ^{1.20} The overall principles behind assessing future needs are relatively simple. The model assesses the current backlog of need for pitches based upon unauthorised sites, concealed households, and the net movement of households from bricks and mortar. It then adds in future arising need in the form of newly forming households, households on sites with temporary planning permissions and net migration to the area. From this figure any empty or undeveloped pitches with planning permission are then subtracted to provide for a final net pitch requirement. The residential and transit pitch requirements for Gypsies and Travellers are identified separately from those for Travelling Showpeople and for each group the requirements are identified in 5 year periods to 2031.

Stage 5: Conclusions

- ^{1.21} This stage draws together the evidence from Stages 1 to 4 to provide an overall summary of the requirements for Gypsies, Travellers and Travelling Showpeople in Central Bedfordshire.

2. Gypsy and Traveller Sites and Population

Background

- 2.1 A Strategic Housing Market Assessment focuses upon the number of dwellings required in an area, and how many of these should each be provided by the public and private sector. The central aim of this study was to follow a similar format for Gypsy and Traveller and Travelling Showpeople accommodation requirements.
- 2.2 One of the main considerations of this study is the provision of pitches and sites for Gypsies and Travellers. A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans, but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople the most common descriptions used are a plot for the space occupied by one household and a yard or collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in Central Bedfordshire.
- 2.3 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of Gypsy and Traveller sites is the publicly-provided residential site, which is provided by the local authority, or by a registered provider (usually a housing association). Places on public sites can be obtained through a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing). There are currently three public sites in the study area.
- 2.4 The alternative to public residential sites is private residential sites for Gypsies and Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing.
- 2.5 The Gypsy and Traveller and Travelling Showpeople population also has other forms of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few weeks to a period of months. An alternative is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate Gypsies and Travellers whilst they travel.
- 2.6 Further considerations in the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Caravan Count

- 2.7 A source of information available on the Gypsy and Traveller population derives from a bi-annual survey of Gypsy and Traveller caravans, required by government, conducted by each Local Authority in England on a specific date in January and July of each year, and reported to CLG. This count is of caravans and not households, which makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. It must also be remembered that the count is merely a ‘snapshot in time’ conducted by the Local Authority on a specific day and that any unauthorised encampments which occur on other dates will not be recorded. Likewise any caravans that are away from authorised sites on the day of the count will not be included.
- 2.8 The charts below show the cumulative number of unauthorised and authorised caravans in each Local Authority area at the time of the counts. Please note that the scale on each chart varies and that the charts are to be read cumulatively to give the total caravan count. The data reported does not include any Showpeople caravans in the area. We would also note the figures are provided for illustrative purposes to demonstrate the relative size of the populations and are not used in any modelling of future pitch requirements.

Figure 1
Gypsy Caravan Count for Public Sites in Central Bedfordshire: Jan 2007 – July 2013 (Source: CLG Bi-annual Local Authority Caravan Count)

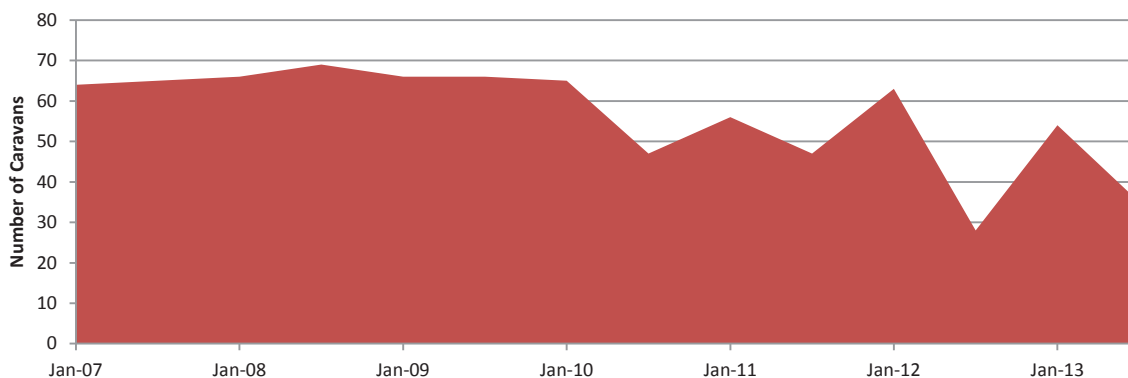


Figure 2
Gypsy Caravan Count for Private Sites in Central Bedfordshire: Jan 2007 – July 2013 (Source: CLG Bi-annual Local Authority Caravan Count)

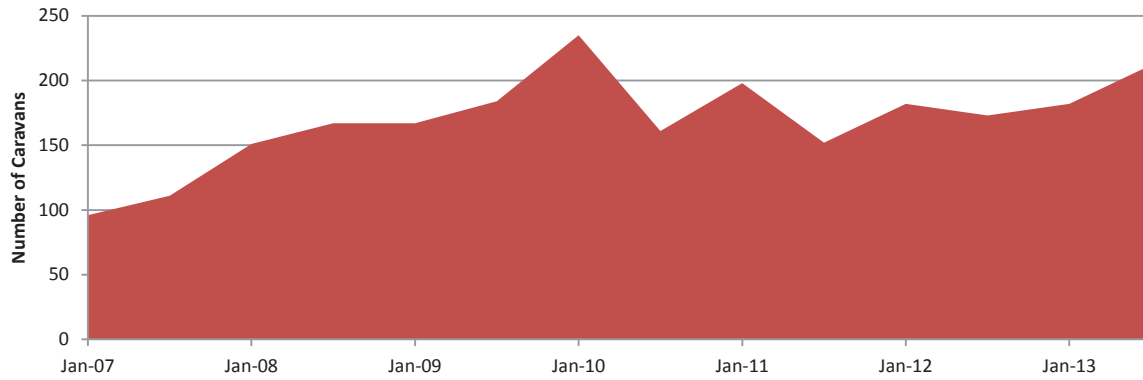
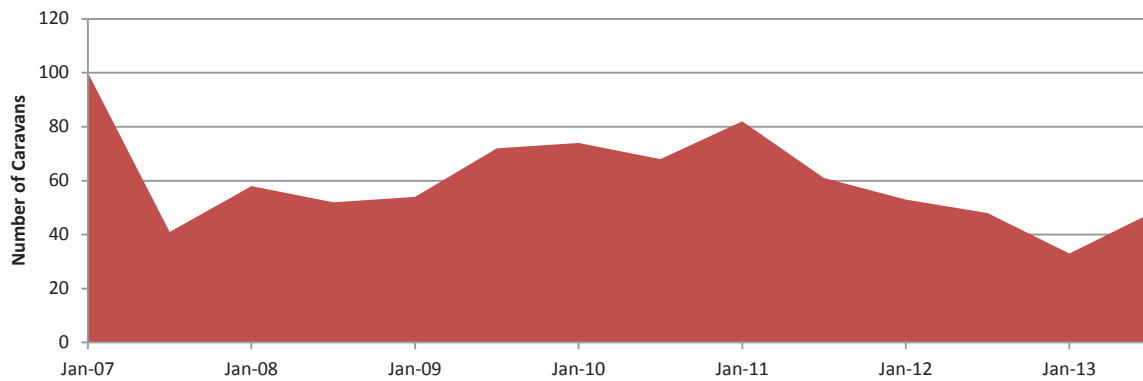


Figure 3
Gypsy Caravan Count for Unauthorised Sites in Central Bedfordshire: Jan 2007 – July 2013 (Source: CLG Bi-annual Local Authority Caravan Count)



3. Stakeholder Consultation

Introduction

- 3.01 In order to set the context of the research and ensure the study is based on a sound understanding of the relevant issues, a list of 68 contacts was provided to ORS by the Council with the aim of carrying out telephone interviews.
- 3.02 33 individual interviews were undertaken and the following is a breakdown of each consultation group:
- » 8 Members;
 - » 9 Officers;
 - » 10 Officers from surrounding areas;
 - » 6 Stakeholders.
- 3.03 ORS conducted 33, semi-structured and in-depth telephone interviews during November and December 2013 = 49% response¹. The interviews typically lasted between 30- 40 minutes.
- 3.04 Reasons for not being able to conduct interviews were:
- » Those requested by e-mail to provide telephone contact details did not do so;
 - » Colleagues within the same organisation had already been interviewed and nothing further could be added;
 - » The person contacted felt they did not have any information that would be of help to the study;
 - » The person contacted had existing commitments and could not complete an interview within the timescale;
 - » Those contacted did not respond.
- 3.05 The following neighbouring authorities chose to take part in the GTAA. Interviews were conducted with officers from: Dacorum Borough Council, Milton Keynes Council, St Albans District Council, North Hertfordshire District Council, Buckinghamshire County Council, Bedford Borough Council, Stevenage Borough Council, Hertfordshire County Council and Huntingdonshire District Council.
- 3.06 The aim of interviewing nearby authorities is to identify any migration between districts, what routes may be travelled, background information on the framework within which the authorities operate and any perceptions they may have regarding Gypsy, Traveller and Showpeople communities within their operational areas.
- 3.07 The officers interviewed work in the following departments: Strategic Planning and Housing, Spatial Planning and Design, Planning and Housing, Planning with Development/Policy/ Projects/Enforcement/

¹ This response rate is based on the list of 68 names included on the Council's contact list.

Transport, Gypsy and Traveller Service, Children’s Services, Development Management, Housing/Housing Strategy/Housing Management/Private Sector Housing.

3.08 ORS also interviewed wider Stakeholders and these included interviews undertaken with individuals who had knowledge and experience of working with Gypsies and/or Travellers. These interviews included Bedfordshire Police, Bedfordshire and Luton Fire and Rescue Service, Bedfordshire Gypsy & Traveller Services and Registered Providers (RPs).

3.09 With the aim of obtaining bricks and mortar contacts ORS interviewed representatives from the following RPs:

- » Aldwyck Housing Association;
- » Guinness Partnership Housing Association;
- » Hightown Praetorian & Churches Association.

3.10 Central Bedfordshire Council operates a sub regional choice based lettings scheme and its partners are Aragon Housing Association, BPHA and Luton Borough Council.

3.11 All of those interviewed, including Members, were asked whether they could identify or knew any Gypsies, Travellers or Showpeople living in bricks and mortar accommodation and if so, could they give a letter from ORS to them. The letter from ORS asks whether they would like to be involved in the Accommodation Needs Assessment consultation;

3.12 RPs were also asked how well they are able to identify these households within their current monitoring mechanisms and whether there are specific issues in relation to housing people from the Gypsy, Traveller or Showpeople communities.

3.13 RPs, together with other organisations found they were able to provide very little data through their monitoring systems. The majority of Officers confirmed they knew of people from the Gypsy, Traveller or Showpeople communities living in their areas or in their properties because of Officer experience/knowledge, but not because of the analysis of statistical data.

3.14 The reasons given for not being able to accurately provide information was due to people not self-declaring their ethnicity during the housing application process or it was not possible to extrapolate this information from data sets/computer systems and/or tended generally not to be included in monitoring.

3.15 The Consultation section has been split into two distinct sections:

- » Officers and Members of Central Bedfordshire Council and Officers representing neighbouring authority areas;
- » Wider Stakeholders – including Registered Providers.

3.16 Due to issues around data protection and in order to protect the confidentiality of those who took part, this section does not include verbatim comments and it aims to represent a summary of the views and responses expressed by Officers, Members and Stakeholders during the consultation interview process.

3.17 The Consultation Section may, in some places, be representative of personal views and opinions and not necessarily the views of the organisation the interviewee works for.

- 3.18 The Consultation Section is based on information provided during the interview process and may not have a direct correlation to the factual information given to ORS from the local authority for example number and names of sites.

Central Bedfordshire Officers and Members and Officers employed in neighbouring areas

Background

- 3.19 Officers for Central Bedfordshire Council were able to provide background information to the history and current status of the Council's GTAA. The Council is currently developing a Gypsy and Traveller Local Plan and the current draft identifies 66 pitches. In addition to this since January 2013 planning permission has been granted for a further 45 pitches across Central Bedfordshire.
- 3.20 Members responding from Central Bedfordshire Council highlighted their involvement in the consultation for new sites as part of the Local Development Framework (LDF) process and how, at times it was a difficult balance in representing the views of the settled community with the need to provide new sites, especially when there are long waiting lists for housing for local residents in their wards.
- 3.21 Some Members believe there is a genuine need to meet any identified need for Gypsies, Travellers and Showpeople and there appeared to be a positive view in relation to the way forward and the allocation of windfall sites.
- 3.22 Officers from neighbouring areas confirmed the following:
- » Dacorum BC – recent GTAA undertaken which has identified additional need which the council is seeking to provide;
 - » Milton Keynes Council – Sub-regional GTAA undertaken and sites have been identified in the Milton Keynes Local Plan;
 - » St Albans District Council – an updated GTAA has been commissioned to inform the Strategic Local Plan;
 - » North Hertfordshire District Council – A GTAA has been undertaken Countywide and a recent GTAA has been completed specific to the Council – low levels of need have been identified in their area;
 - » Buckinghamshire County Council – a joint GTAA has been undertaken with all local authority districts and this is currently in draft;
 - » Bedford Borough Council – A GTAA was undertaken in 2012 that identified need for additional pitches to the end of the plan period (2021). The need was assessed and it found that the current provision is now meeting that need and there is no plan to provide more sites;
 - » Stevenage Borough Council – a GTAA was undertaken in 2006 and resulted in an extension of an existing public site by 3 pitches. A new GTAA has recently been undertaken and is currently in draft and is yet to be published
 - » Huntingdonshire District Council - A review of the 2006 Gypsy and Traveller Sites Assessment (GTAA) has been carried out by Cambridgeshire County Council Research

Group on behalf of the nine authorities involved in the original study. The Gypsy and Traveller Accommodation Needs Assessment (GTANA) was completed in October 2011. The target is 2.5 pitches per year to 2036 which will meet the target set in the GTANA of 64.

Accommodation Provision: Authorised Sites, Unauthorised Developments/Temporary Permission and Bricks and Mortar

- 3.23 Officers from Central Bedfordshire Council identified three authorised public sites, one of which is currently under refurbishment and will be reopened in 2014 exclusively for the use of Gypsies, Travellers or Showpeople over 50 years of age.
- 3.24 The majority of Officers highlighted that private sites were designed and built by the residents of the sites and therefore they invested in their sites to meet their needs. The majority of Officers acknowledged that owners of private sites are more likely to apply for permission to increase the occupancy or increase the area of the site due to family growth and sometimes will do so without first seeking planning permission.
- 3.25 It was generally agreed by Officers from Central Bedfordshire that the authorised sites, whether private or public, are in good condition, residents are able to access services such as health and education and there are no particular issues in relation to community cohesion as far as is known.
- 3.26 Some Members stated there have been issues on the public sites regarding community cohesion, but over recent years relations between residents of the sites and the settled community have improved.
- 3.27 Members generally agreed that facilities and the condition on the public sites are good and residents are able to access services such as doctors' surgeries and schools.
- 3.28 The majority of Members believe that the privately run sites are well managed, but should not be extended. One Member mentioned a Showpeople site, which although not overcrowded in terms of the number of people living on the site, may need to expand because of the amount and type of equipment associated with travelling fairs.
- 3.29 Officers responding from neighbouring authorities highlighted the following authorised sites in their areas:
- » Bottoms Walton, Burnham, Buckinghamshire (public site) - 10 pitches;
 - » Green Park, Amersham, Buckinghamshire(public site) - 8 pitches;
 - » Mansion Lane, Iver, Buckinghamshire (public site) - 32 pitches;
 - » The Orchards, Chalfont St Peter, Buckinghamshire (public site)- 5 pitches;
 - » Wapseys Wood, Gerrards Cross, Buckinghamshire (public site)- 17 pitches;
 - » There are a large number of small privately owned sites in the Buckinghamshire area;
 - » Long Marston, Hertfordshire Dacorum District Council (public, County managed) – 6 pitches;
 - » Three Cherry Trees Lane, Hemel Hempstead, Hertfordshire Dacorum District Council (public, County managed) 30 pitches;
 - » Two privately owned Showpeople site in the Dacorum District Council area – (11 plots);

- » Hertfordshire County Council Gypsy and Traveller Service manage 10 public sites including the two in the Dacorum District Council area – (approximately 200 pitches in total);
- » Two public sites in the Milton Keynes District Council area and a further site is being proposed that may or may not be publicly owned/managed;
- » Approximately two private sites in the Milton Keynes District Council area;
- » Three public sites in the St Albans District Council area – (40 pitches in total);
- » Six private sites in the St Albans District Council area – (25 pitches);
- » One private site in North Hertfordshire District Council – (12 pitches);
- » One public site at Kempston Hardwick Bedford Borough Council – (22 pitches);
- » One public authorised site Stevenage Borough Council – (3 pitches);
- » One site owned by Huntingdonshire County Council and managed by Luminus – (20 pitches);
- » Five sites privately owned in Huntingdonshire District Council area (in addition to this there are 2 sites with personal permissions and 3 sites with certificates for existing use).

3.30 Officers in neighbouring areas reported that they had some public sites which are overcrowded and/or waiting lists are full. There are also some public sites that are currently being refurbished or there are plans to refurbish them in the near future; although accessing grant funding for refurbishments in the current climate is proving challenging for some local authority areas.

3.31 The general consensus of Officers responding from neighbouring authorities is that the public and private sites are in the majority of cases meeting the needs of residents and there are no current issues in relation to anti social behaviour or community cohesion..

3.32 Officers responding from Central Bedfordshire gave a few examples of unauthorised developments or sites with temporary permission in the area. Where unauthorised development does occur it is usually due to the expansion of existing authorised private sites.

3.33 Unauthorised sites and those with temporary planning permission in the Central Bedfordshire area are acknowledged by Officers as being, in some cases, in poor condition when compared to authorised sites. Issues such as inadequate drainage, water pressure/water supply and unsafe electric supplies are concerning to Officers. It is believed by the majority of Officers that this is because owners/residents do not wish to invest in a site until planning permission had been secured.

3.34 Some Officers believe that granting planning permission on sites with temporary planning permission may encourage owners to invest in the sites which will improve the living conditions for residents.

3.35 Some Members understand there to be few unauthorised developments in Central Bedfordshire and that when they do occur it is when a site with temporary planning permission lapses or when a private site is expanded without planning permission. It was acknowledged that this sometimes results in tension with the settled community as the residents of these sites appear to be flouting planning law.

3.36 Officers responding from neighbouring authority areas had few examples of unauthorised developments and/or sites there are tolerated in their areas.

- 3.37 A minority of Officers from neighbouring authority areas believe that unauthorised developments or sites with temporary planning consent are more likely to be in poor condition and in addition to this Officers understood there to be greater management issues; the majority of Officers however felt unable to comment as these types of sites do not occur in their areas.
- 3.38 Some Officers responding from Central Bedfordshire Council believe there may be some Gypsies, Travellers or Showpeople living in bricks and mortar accommodation. However, they are unable to identify specific households and do not know them personally.
- 3.39 A minority of Officers responding from Central Bedfordshire Council believed there may be a psychological aversion or a cultural preference not to live in bricks and mortar accommodation. In addition to this some Officers believe that the preference may be for static caravans together with a touring caravan when perhaps given the choice between a site and bricks and mortar accommodation.
- 3.40 Some Officers appreciated or empathises that some Gypsies, Travellers or Showpeople may find living in bricks and mortar accommodation detrimental to health and potentially could lead to illnesses such as depression.
- 3.41 Members are aware that in some of their wards there are Gypsies, Travellers and Showpeople living in bricks and mortar accommodation but they do not know them personally. Members generally believe that these Gypsies, Travellers and Showpeople appear to have integrated into the community and there is only the odd family that may cause tensions.
- 3.42 Both Officers and Members believe that the housing that may be provided to Gypsies and Travellers in Central Bedfordshire is in good condition and is accessible to amenities.
- 3.43 Officers responding from neighbouring authorities were unable to provide information regarding Gypsies, Travellers or Showpeople who may be living in bricks and mortar accommodation in their areas.
- 3.44 Where Gypsy and Traveller Accommodation Needs Assessment (GTANAs) have been undertaken in nearby local authority areas very little information about their needs have been identified and Officers reported it was challenging to identify any such households to assist in their GTAA consultation/research.
- 3.45 Where a County Council manages sites and where waiting lists are held it appears that this is helpful in identifying what accommodation need there may be. This is because some Gypsies, Travellers or Showpeople living in bricks and mortar accommodation may wish to move back onto a site and applied to go on a specific site waiting list.

Accommodation and Management: Roadside Encampments/Transit

- 3.46 Members and Officers responding from Central Bedfordshire Council confirmed they are unaware of any short-term unauthorised roadside encampments in their area currently. However, they acknowledged there have been a few instances of roadside encampments and when they do occur it is usually for short periods of time and during spring and summer. Officers believe there has been a decrease in the number of unauthorised encampments over recent years, although no reasons or statistics were provided to evidence this.
- 3.47 Officers responding from nearby local authority areas confirmed they had few instances of unauthorised encampments and the level had decreased over recent years. When encampments occur the occupants

tend to stay in the area for a few days and then move though to other areas; it was not know where these Travellers move to. Officers generally agree that those who set up encampments in their areas are doing to in order to visit relatives or are attending a specific occasion such as a wedding or they are just travelling through.

- 3.48 Only one nearby local authority reported they had an encampment at the time of the interview.
- 3.49 Hertfordshire County Council manage a transit site and Bedford Borough Council also have transit provision.

Gypsies and Travellers - Trends, Favoured Locations and Stopping Points

- 3.50 When asked to consider trends in relation to these communities Officers from Central Bedfordshire Council believe there have been no significant trends, although some Officers think there has been an increase of planning permissions being granted in relation to private sites.
- 3.51 Some Officers believe that although the number of encampments has reduced over recent years, the actual numbers of Gypsies and Travellers has increased. It was put forward that this is because more Gypsies and Travellers are living permanently in the area on their own sites lawfully and this has encouraged others to seek the same.
- 3.52 Officers from neighbouring areas also report they had seen a decrease in the number of unauthorised encampments over recent years; one Officer suggested that in their area it is because favoured places traditionally used by Gypsies and Travellers have been earth bunded so they can no longer access these areas.
- 3.53 The majority of Officers responding from neighbouring authorities believe they have seen an increase in sites gaining permanent and temporary planning permission, often retrospectively.
- 3.54 Officers from Central Bedfordshire in the main do not believe there are favoured areas or stopping points in the district although some Officers did suggest Arlesey, Dunstable, Leighton Buzzard, Pottton and Biggleswade; Biggleswade was also mentioned specifically in relation to Showpeople. Although no specific reasons were put forward as to why these areas are considered as being favoured places, some Officers suggest it is because there are a number of privately owned sites in those areas and relatives come to visit.
- 3.55 Mention was made by Members that roadside encampments occasionally occur on an industrial park on the north side of Biggleswade and there has been an encampment on a recreation ground in Pottton. It is generally agreed by Members that the few encampments that occur in the area are ad-hoc and tend to be on the main road networks through the area and therefore there are no specific locations or favoured areas as far as Members are aware.
- 3.56 Officers responding from neighbouring local authority areas believe that Hertfordshire, generally, is a favoured location due the motorway networks through the area and the only other favoured areas are usually within the proximity of existing sites.

Future Accommodation Needs

- 3.57 A few Officers stated that some of the authorised sites will need to be expanded or new sites provided (either private or public) to meet natural family growth and newly forming households.

- 3.58 A minority of Officers working for Central Bedfordshire Council believe that transit sites should not be provided as they are understood to be hard to manage, whilst a small number of Officers believe that a small transit site should be provided.
- 3.59 The majority of Officers responding from nearby authority areas confirmed they are meeting the need for sites as identified in their GTAA's. A minority of Officers confirmed there is a small amount of unmet need and this possibly is for public provision as opposed to private sites.
- 3.60 In terms of the criteria to be considered when determining where a site should be, Officers and Members from Central Bedfordshire Council either referred to the emerging policy GT5 and/or stated the following views:
- » Sites should be near local services and facilities such as shops, GPs and schools (especially lower and middle schools and there should be a choice of schools) and therefore in sustainable locations;
 - » Sites should be near existing sites, but should not dominate the settled community;
 - » Accessible to local road networks and public transport;
 - » Access to services/facilities on site such as water, sanitation, rubbish collection and electricity;
 - » An impact assessment should be undertaken in relation to the local environment.
- 3.61 Officers from Central Bedfordshire Council were in the main unable to suggest a suitable location for a site other than those mentioned in the Local Plan; only two locations were suggested: Dunton Lane (2 sites identified) and Pulloxhill. Some Officers suggested that no sites should be granted permission in the green belt or Areas of Outstanding Natural Beauty (AONB) such as the Chilterns.
- 3.62 Officers from Central Bedfordshire Council generally agree that smaller sites, privately owned for the use of an individual or specific family are preferable to large sites. However, there is an acknowledgement by some Officers that not all Gypsies or Travellers can afford to buy their own site and therefore there is a need for public owned site provision in order to ensure a mix of affordable accommodation and choice for these communities in the same way as the settled community.
- 3.63 In terms of the management of sites respondents from Central Bedfordshire Council generally agree that small private sites are, in their experience or belief, better managed, although no issues were identified with regard to the management of the public sites in the District. Some Officers believe that public sites are difficult to manage because there is a mix of Gypsies and Travellers and the different communities do not always live harmoniously together.
- 3.64 One Officer suggested that public sites can meet identified need quicker as they tended to be larger than privately owned sites.
- 3.65 Members generally agreed that smaller private sites owned and managed by Gypsies or Travellers are preferable to large publicly owned/managed sites.

Community Cohesion, Employment, Health and Education Issues

- 3.66 Officers did not mention any specific issues in relation to Showpeople when speaking about community cohesion.

- 3.67 Some Officers from Central Bedfordshire Council also highlighted that there are sometimes internal family feuds and also specific groups of Gypsies and Travellers such as Irish Travellers and English Gypsies, and thus they are unlikely to live on the same site. This leads to sites becoming specific to either one or the other; mixed groups of Gypsies or Travellers are less likely.
- 3.68 Members stated that community cohesion usually deteriorates when consultation arose on the proposal of new sites by the Council or when applications for the expansion of an existing site or a new privately owned site are open to consultation with the local settled community. This had led to some action groups being set up in protest to new identified sites and what was considered over zealous reports in the press.
- 3.69 It was mentioned that a public site at Kempston Hardwick located in the Bedford Borough Council area and borders Central Bedfordshire, sometimes causes concern in relation to fly tipping and loose/abandoned horses for local residents.
- 3.70 Some Members believe that not enough is being done in the area to improve community cohesion and more could be done at a local level.
- 3.71 Officers responding from Central Bedfordshire Council generally agreed that residents living on authorised sites are able to access health and education services. One Officer highlighted that improvements to adult education for those living on sites should be seen as a priority, alongside the need to support children in regular school attendance.
- 3.72 With regard to employment issues Officers generally believe that Gypsies, Travellers or Showpeople are more likely to be self-employed and therefore will not necessarily want or need to access employment related services.
- 3.73 The majority of Members do not have a view with regard to Education, Health or Employment in relation to the Gypsy, Traveller or Showpeople communities; one Member mentioned that sometimes planning permission is granted because of the applicant's need to attend a local hospital due to poor health.

Cross Boundary and Consultation Activities

- 3.74 Officers from Central Bedfordshire Council believe that the main travelling routes for Gypsies, Travellers or Showpeople are the A5, M1 corridor and possibly the M25 although outside of the District. It is thought that some of these road networks may be used because they are main routes to Ireland and back.
- 3.75 Members highlighted the road from Dunton Lane out of Biggleswade, the road network from Cambridgeshire and Peterborough, A507, A1 and M1.
- 3.76 Officers responding from nearby local authority areas believe the following roads are used by Gypsies, Travellers or Showpeople: M1, M25, A1M, M40, A34 and A505
- 3.77 Officers from the Council generally agree that when encampments occur it is due to long distance Gypsies or Travellers (and possibly Showpeople) passing through the area and those who live on the sites and are based permanently are local to Central Bedfordshire. These Gypsies and Travellers tend to be static, but perhaps are transient during the summer holidays.
- 3.78 Some Members believe that in Central Bedfordshire the Gypsies and Travellers living in the area do not travel in a transient way and if they do, it will be during the summer holidays.

- 3.79 Council Officers or Members gave no indication that Gypsies or Travellers are moving out of the area, although a minority of Officers believe that more are coming to the area because of the increase in planning permissions being granted for private sites.
- 3.80 The majority of Officers responding from neighbouring areas do not believe that Gypsies, Travellers or Showpeople are moving out of their area to neighbouring districts. Only two Officers reported that a small number may be moving to nearby areas because those local authority areas had more sites than they have.
- 3.81 Council Officers and Members and Officers responding from neighbouring areas have no knowledge that Gypsies, Travellers or Showpeople are being shifted back and forth between local authority areas, although one Officer mentioned some Travelling Showpeople from Leighton Buzzard who moved to Aylesbury but have since returned.
- 3.82 Officers and Members highlighted few examples of cross-border working other than between education services and enforcement officers; there have been some meetings between nearby local authorities with regard to planning. However, the consensus is that cross-border working needed to be improved.
- 3.83 Officers responding from neighbouring local authority areas gave some examples of cross-border working such as undertaking GTAAs on a sub-regional or countrywide basis. However, further work in terms of updates is proving challenging because of the different stages Local Planning Authorities (LPAs) are at with their Local Plans.
- 3.84 The majority of Officers believe that the Council is meeting the duty to co-operate although there is a recognition that this is a two way process and sometimes there are delays in gaining response from neighbouring authorities and therefore communication could be improved.
- 3.85 Officers responding from nearby local authority areas believe they are complying with the Duty to Cooperate and believe Central Bedfordshire Council is too and the process has now been assisted because of clear Government guidance. Some Officers also highlighted the need for sustained liaison and communication at Officer Level in order to ensure continuous improvement; one Officer suggested that at some point future cooperation will be required at a political level between local authority areas with regard to Gypsies, Travellers and Showpeople.
- 3.86 Officers responding from neighbouring local authority areas generally agree that consultation could be considered regular on the public run sites; this is sometimes specific if related to site refurbishment and the gaining of grant funding or in relation to GTAAs for example.
- 3.87 Officers responding from neighbouring local authority areas confirmed they visit sites to undertake consultation as written formats are less likely to be effective, sometimes due to low levels of literacy.

Future Priorities and Any Additional Issues

- 3.88 It was generally agreed by all those interviewed that massive change is unlikely in relation to the numbers of Gypsies, Travellers or Showpeople living or travelling through the Central Bedfordshire area.
- 3.89 Some Officers responding from Central Bedfordshire Council believe that significant in-roads have been made in the provision of sites in the District. However, concerns were raised because there is a small existing identified unmet need and should any additional need be identified it will be down to political will as to whether any future sites will be developed; especially in relation to the provision of public sites.

- 3.90 Some Officers believe that amenities on existing sites and the granting of permanent planning permission on sites with temporary permission should be seen as a priority for Central Bedfordshire Council.
- 3.91 Little mention was made to Showpeople in the interviews with Officers from Central Bedfordshire, although one Officer mentioned that a group of Showpeople had recently arrived in the area and more needed to be understood as to what their needs may be.
- 3.92 Some Officers responding from Central Bedfordshire believe that more support and advice should be provided to Gypsies and Travellers but this may mean that more resources such as staff will be needed. Examples of the type of advice that would be needed included planning advice for those who wish to own their own sites especially in relation to suitable/appropriate locations and also assistance in relation to accessing education for both adults and children.
- 3.93 Some Officers from Central Bedfordshire Council believe that further work with both the settled community and Gypsies, Travellers and Showpeople could help in relation to community cohesion.
- 3.94 Members generally agree that the priority for the Council is to identify accurately any need there may be for more sites in Central Bedfordshire based on local need only, and any new sites should be located with sensitivity to local residents.
- 3.95 Some Members hoped that sites with temporary planning permission can be made permanent where these sites are felt appropriate. It was put forward that any new housing development, dependent on size and location, should have a small site proposed in any design. Members appreciated that the identification of need and location of any sites is always going to be a contentious issue.
- 3.96 Some Members believe that more work needs to be carried out in terms of dispelling myths and stereotyping of Gypsies and Travellers and such communities should not be confused with Showpeople. However, some Members also believe that Gypsies, Travellers and Showpeople need to do more themselves to become members of the wider community in Central Bedfordshire.
- 3.97 Officers responding from neighbouring areas generally wanted to ensure that their councils are meeting any identified need and sites are identified in suitable location, and that all local authorities should be looking to do the same in their own area.
- 3.98 Some Officers from nearby local authority areas are looking to expand/upgrade their existing sites as a priority where need has been identified.
- 3.99 Some Officers from nearby local authority areas will not know what their priorities are until their GTAAs have been published or updated.
- 3.100 Some Officers from nearby local authority areas are looking to work with others on updated GTAAs, but a minority of Officers are concerned that yet another GTAA will be undertaken which may identify need, but no sites are provided due to the lack of political will.
- 3.101 One Officer from a nearby local authority area wanted to see more resources/investment for those roadside to ensure improved support and access to services such as health and education.

Wider Stakeholders

3.102 Background

3.103 The majority of Stakeholders interviewed are not local authorities and therefore do not undertake their own GTAAs and therefore are unaware as to the status of these documents in their area.

3.104 Organisations that were asked do not have any policies specific to Gypsies, Travellers or Showpeople but used overarching policies and constitutional documents; examples were given as Equality and Diversity, lettings and allocations especially in relation to Choice Based Lettings. Although not specifically used in relation to Gypsies and Travellers there was usually an equality and diversity statement included in any policy documentation.

3.105 The majority of respondents have not undertaken any specific training in relation to Gypsies, Travellers and Showpeople.

Accommodation Provision: Current Site Provision and Bricks and Mortar

3.106 No issues were raised about difficulties for residents accessing services such as education or health and no issues regarding anti social behaviour or community cohesion have been highlighted.

3.107 Stakeholders are unable to identify or comment on private sites.

3.108 Stakeholders are unable to identify any unauthorised developments or sites with temporary planning permission so are unable to comment as to whether or not the sites meet needs of residents.

3.109 A minority of respondents stated they are aware of some Gypsies, Travellers or Showpeople living in bricks and mortar accommodation. A letter from ORS was made available for Stakeholders to pass to anyone they could identify. However, no specific households in bricks and mortar were identified by Stakeholders.

3.110 RPs confirmed they do monitor ethnicity and have the ability to extrapolate statistical data in relation to Gypsies and Irish Travellers where this has been declared by an applicant. One RP confirmed that of the properties 833 they have in Central Bedfordshire, only one had declared themselves as a Gypsy or Irish Traveller; but this household is no longer a tenant.

3.111 RPs did not provide any meaningful information as to where any Gypsies, Travellers or Showpeople they house moved from, such as their previous location, tenure or reason for needing to be housed.

3.112 Where RPs monitor this information it is reliant on whether or not those completing the necessary application form or who are asked to update their profiles declare this information.

3.113 It was generally agreed that Gypsies, Travellers or Showpeople living in bricks and mortar housing may be reluctant or unwilling to be interviewed as part of the consultation because, it is believed, they are suspicious of those in authority and also as to what the information will be used for.

3.114 Some Stakeholders believe that bricks and mortar accommodation does not meet the needs of Gypsies, Travellers and Showpeople because it is against their culture.

3.115 Some Stakeholders suggested that more information should be provided by the local housing authority in relation to whether a prospective tenant is a Gypsy, Traveller or Showperson. It is believed that this would

help with the allocation of suitable properties and their cultural needs can be considered. It would also ensure that support can be put in place from the start of the tenancy should it be required; thus assisting in a sustained tenancy.

3.116 RPs did not raise any specific issues in relation to housing management of accommodation for Gypsies, Travellers or Showpeople.

Accommodation and Management: Roadside Encampments/Transit

3.117 Some Respondents believe that encampments occur in the area are because of specific events such as a wedding or funeral, because they are moved from other local authority areas or because a new site has been developed with the hope they will get a pitch.

Gypsies and Travellers - Trends, Favoured Locations and Stopping Points

3.118 Respondents did not report any significant trends at the present time.

3.119 Respondents did not believe there were any particular locations or stopping points that are favoured by Gypsies, Travellers or Showpeople in Central Bedfordshire. One respondent mentioned that a location in Hatch had been occupied a few years ago, but no locations in Central Bedfordshire were highlighted as being used by Travellers. Goldington Green were suggested, but this is not in Central Bedfordshire.

Future Accommodation Needs: Permanent and Transit provision

3.120 Stakeholders had mixed views as to whether there is sufficient site provision in the Central Bedfordshire area. The majority believed, however, that additional sites should be provided, but whether private or public sites were preferred was not clear.

3.121 One respondent suggested that as there is no current transit provision in Central Bedfordshire such provision is needed to ensure that an alternative can be offered to those on unauthorised encampments.

3.122 Respondents stated the following as important criteria to consider with regard to site location and design:

- » Access to amenities and facilities such as GPs, schools, shops, public transport etc.;
- » Access to facilities on site such as water, electric, drainage and rubbish disposal;
- » Sufficient access and space for emergency vehicles;
- » In close proximity to other residential areas and not located in rural areas where residents could be isolated.

3.123 The majority of Stakeholders were unable to suggest locations for new sites.

3.124 There was no indication by Stakeholders to suggest that pressure would be placed on bricks and mortar accommodation by Gypsies, Travellers or Showpeople.

Community Cohesion, Employment, Health and Education Issues

3.125 Stakeholders in general agreed there are issues around community cohesion and in particular the concern by the settled community when sites are proposed in their area because they believe their houses will be devalued because of the proximity of a Traveller site.

- 3.126 Some specific examples were given with regard to community cohesion such as the behaviour of some residents of the Tilsworth and Billington sites by local residents.
- 3.127 Stakeholders mentioned that initiatives to improve relationships were in place and in particular the work being undertaken with young people on Traveller sites have been successful in breaking down the barriers that can sometimes exist between Travellers and the settled community.
- 3.128 RPs did not highlight any specific issues in relation to the housing of Gypsies, Travellers or Showpeople in bricks and mortar accommodation in relation to anti social behaviour or their integration into the settled community.
- 3.129 When issues do arise in relation to community tensions between the settled community and those living on sites or when unauthorised encampments occur, some Stakeholders reported they are dealt with fairly and appropriately by the necessary authorities and this had improved relationships.
- 3.130 It was stated by the majority of Stakeholders that they believe Gypsies, Travellers and Showpeople living on authorised sites and in bricks and mortar accommodation are able to access services relating to employment, health and education.
- 3.131 Stakeholders believe that positive steps have been taken to assist Gypsies, Travellers and Showpeople in relation to employment such as changing a postal address so that it does not specifically use the word "site". It is the belief of some Stakeholders that when a prospective employer knows that an applicant is from a Traveller site that person will be less likely to be asked to interview.

Cross Boundary and Consultation Activities

- 3.132 Stakeholders recorded that the following routes may be used by Gypsies, Travellers or Showpeople: A1, A6, M1, A421, M4 and A414.
- 3.133 The majority of Stakeholders did not believe that Gypsies, Travellers or Showpeople were moving from Central Bedfordshire to other areas or vice versa, nor are they being forced to move between local authority areas because of eviction.
- 3.134 Stakeholders generally believe that Gypsies, Travellers or Showpeople are either based in Central Bedfordshire or are long distance Travellers passing through.
- 3.135 Stakeholders generally believe that cross boundary working could be improved but examples of cross boundary working were suggested such as between countywide police groups.
- 3.136 The majority of Stakeholders are not aware of any consultation with Gypsies, Travellers or Showpeople on a regular basis. There is some consultation undertaken when the bi-annual caravan count is undertaken and on an ad-hoc basis.
- 3.137 The majority of Stakeholders wish to see consultation with Gypsies, Travellers and Showpeople improved and a suggested partnership approach was put forward.

Future Priorities and Any Additional Issues

- 3.138 The majority of Stakeholders believe that further site provision should be provided as a priority, particularly a transit site. Where new sites are provided these should not impact on the existing, local settled community.
- 3.139 Some concern was highlighted over the low levels of literacy within the Gypsy and Traveller community in particular. With the emphasis on information/digital technology it may be that members from these communities may find it even hard to access services from councils and RPs for example.
- 3.140 The majority of Stakeholders are not aware of any consultation with Gypsies, Travellers or Showpeople on a regular basis. There is some consultation undertaken when the bi-annual caravan count is undertaken and on an ad-hoc basis.
- 3.141 It is believed that communication networks need to be improved with members of the Gypsy, Traveller and Showpeople communities in order to ensure that improvements can be made to sites such as safe access for emergency services.

4. Gypsy and Traveller Population

Survey of the Gypsy and Traveller Population

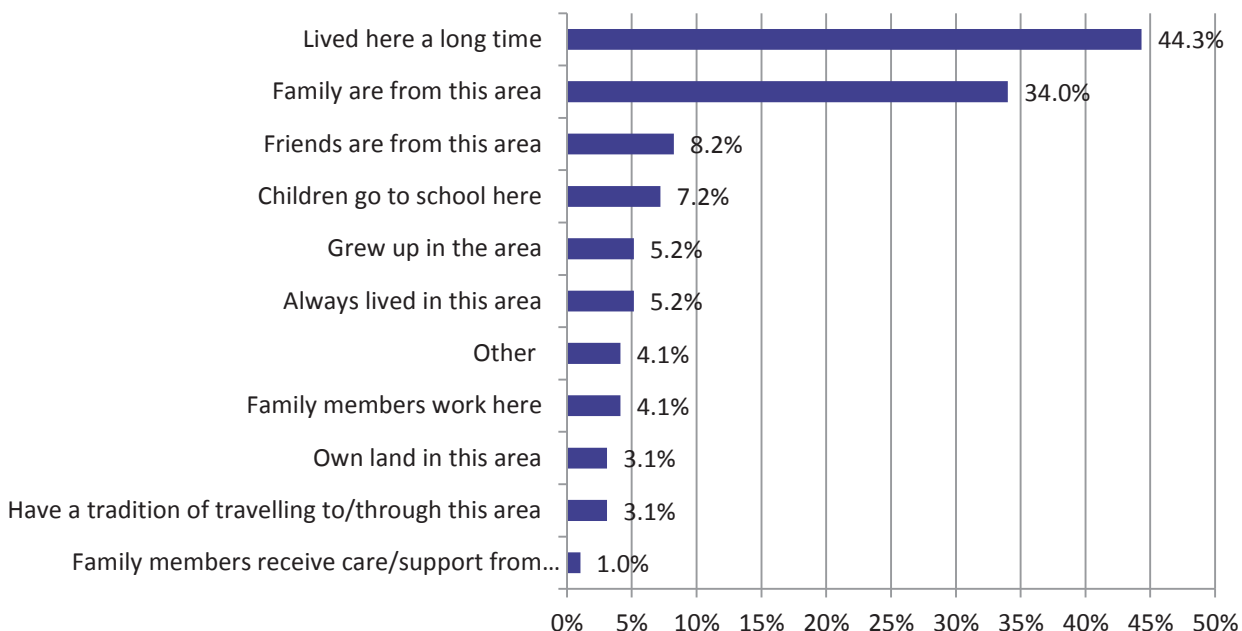
- 4.1 One of the major components of this assessment is a detailed survey of the Gypsy and Traveller population in Central Bedfordshire. This aimed to identify current households with housing needs, and to assess likely future household formation from within existing households, to help judge the need for future site provision.
- 4.2 Interviews were attempted with every Gypsy and Traveller household in the area who were present during November 2013. Therefore, the base date for the findings of this study is November 2013. In total, interviews were achieved on-site with 98 households, representing a 44% response rate.
- 4.3 Throughout this study the person responding to the survey will be referred to as the respondent, and in questions which refer to all people in the household they will be referred to as household members. Throughout the remainder of this report the majority of numbers which appear on the charts represent the percentage of respondents who appear in that category. The purpose of showing percentages is to allow the results of the survey to be extrapolated to the whole Gypsy and Traveller population of Central Bedfordshire. In a few cases, it is more appropriate to use the actual number of respondents, and these cases are clearly identified. In all charts those respondents who answered 'don't know', or did not answer the question, are omitted unless otherwise stated.

Connections with the Area

- 4.4 The vast majority (87%) of those surveyed considered the site to be their permanent base. Of the remaining 12 respondents who did not, 5 identified permanent bases and said they were visiting for a short while, 1 was on an unauthorised site, 2 stated that they travel constantly and the remaining 4 said that they had no permanent base.
- 4.5 By far the most common connections that respondents reported as having with the area were: having lived in the area a long time (44%); and their family being from the area (34%).

Figure 4

Nature of Local Connections in Central Bedfordshire, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2013)



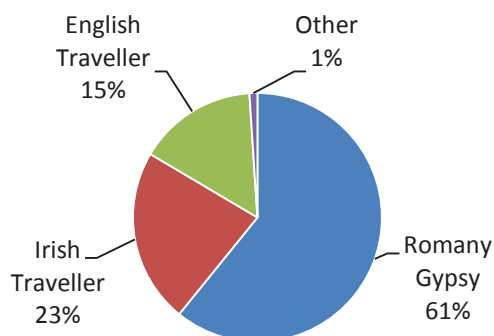
4.6 More than half of respondents (55.8%) reported that their family had lived on their site for 5 years or more, and more than three quarters had been there at least a year. However, 15.8% reported that their family had been living there for less than a month.

Ethnic Background

6.1 Just under three fifths of all respondents identified themselves as being Romany Gypsies, while nearly a quarter said that they were Irish Travellers.

Figure 5

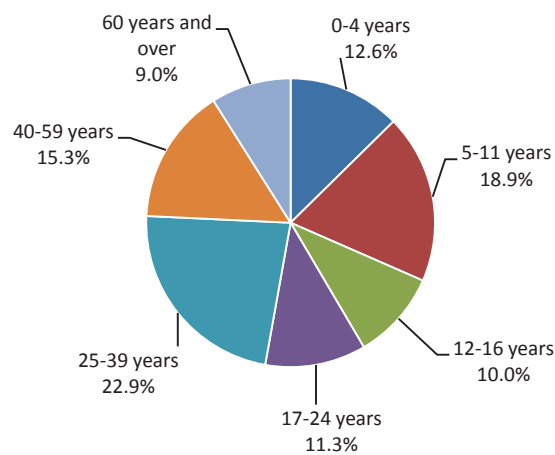
Ethnic Group by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2013)



Age and Household Profile

- 4.7 The households showed a mixed range of ages across their members, very much in line with the results of similar studies carried out by ORS elsewhere. 41% of household members were aged 16 or under. However, we would note that it is typical for Gypsy and Traveller studies to record relatively few males aged 18-60 years, many of who travel on an almost permanent basis. This is the case in Central Bedfordshire with 20 or the interviews conducted at pitches with no adult males household members, so the share of adults in the population is almost certainly higher than shown by the household survey.

Figure 6
Age of Household Members, by all Household Members (Source: Survey of Gypsy and Traveller Population On-site 2013)



- 4.8 More than four fifths of respondents (88.8%) reported just one household living on their pitch. Most respondents (73.5%) reported that there were 4 people or fewer living on their pitch, and 18.3% only had one person living on the pitch.

Health Problems

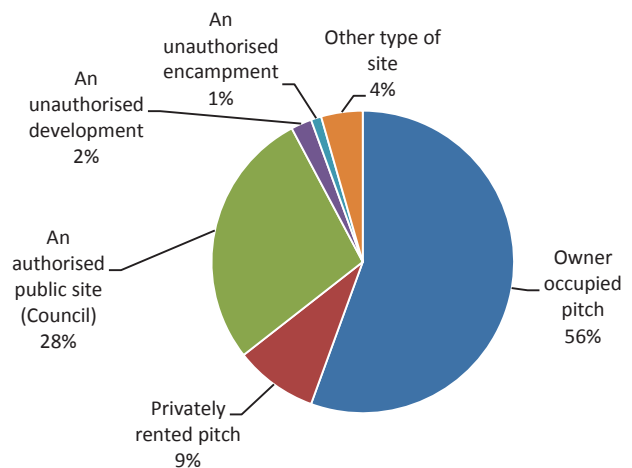
- 4.9 19.4% of respondents interviewed (19 respondents) reported that their household contained at least one member with a long-term health problem. Of those who reported a long term health problem within the household, 36.8% (7 respondents) said their existing pitch did not meet the care needs of those with health issues.

5. Existing Sites

Type of Site

- 5.1 83 interviews (92% of total interviews) were carried out on authorized sites (58 on private sites and 25 on public sites). 3 interviews were carried out on unauthorised encampments and developments. (see Figure 8 below) and 4 respondents said their pitch was on some other type of site.
- 5.2 All respondents were asked if they required any additional caravans at their current pitch. Only 10.3% (10 respondents) indicated that they would like another caravan within their existing household. 3 of these respondents reported that these additional caravans were needed for older children and 5 said they were needed for adult relatives.
- 5.3 When asked how many additional caravans were required, 7 respondents said they would need 2 extra caravans, and 3 respondents said they would need a single extra caravan.
- 5.4 Of these 10 respondents who indicated that they needed any additional caravans, 9 felt there was space on their existing pitch to accommodate these.
- 5.5 The phrasing of this question focused on a need rather than a demand for more caravans. Respondents were asked, irrespective of who was purchasing the caravans, whether they needed more caravans for household members. Therefore, this question simply reflected a perceived need for more caravans, rather than an ability to afford (demand for) more caravans.

Figure 7
Type of pitch, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2013)



Views of Sites

- 5.6 All respondents were asked if their current site was meeting their in terms of accommodation quality and space; site facilities, location and management. Just over a quarter (26.5%, 26 respondents) felt that their current site was not meeting their needs.
- 5.7 A lack of facilities and issues with site management were each identified by 4 of these respondents when asked to explain why their current accommodation does not meet their needs. There were also 4 comments about a lack of day rooms. 3 respondents reported that the site is too small; or that the site lacks electricity.

^{5.8} Respondents were also asked what facilities they felt were needed, if facilities were lacking. The responses most commonly mentioned the installation/upgrading of: toilets, showers or washing facilities; electricity/sockets; and day rooms or day areas (all mentioned by 5 respondents).

^{5.9} Of the 26 respondents who felt that their current accommodation and site did not meet their needs, 24 felt their needs could be addressed at their current pitch.

Bricks and Mortar

^{5.10} Only 5 respondents (5.4%) reported that they had previously lived in bricks and mortar accommodation (i.e. a house, bungalow or flat). Of these, 3 hadn't lived in such accommodation for at least 10 years.

Moving to a New Permanent Base

^{5.11} Only 2 respondents that they would like to move to a new permanent base, either now or in the next 15 years. Of the 2 respondents who would wish to move, 1 would prefer to live in a caravan/trailer on a private site owned by themselves, and 1 would prefer to live in a caravan/trailer on a Council run site. The households seeking to live on a public site are currently on an unauthorised site, while the household seeking a private site are currently sharing a pitch with another family.

6. Travelling Showpeople

Travelling Showpeople Households in Central Bedfordshire

- 6.01 The population of Travelling Showpeople is typically smaller than that of Gypsies and Travellers and planning records also tend to be more disparate. In total the study area contains three authorised yards, three long-term tolerated yards and one unauthorised yard with a total of up to 46 plots.
- 6.02 During the course of the household survey with Gypsies and Travellers interviews were attempted with all Showpeople households in the area. In total, 9 interviews were carried out with Travelling Showpeople, while a spokesperson for the unauthorised yard also providing separate information. Given the limited number of full interviews undertaken with Travelling Showpeople and also the less structured information gained from site visits, we have chosen not to provide detailed statistics on the population.
- 6.03 The survey of the Travelling Showpeople produced two main issues. Firstly an existing site is overcrowded. Three households in the on-site interview stated they were already looking to move to a four plot yard nearby. This site is specifically designed to address the needs of four concealed households.
- 6.04 Meanwhile, an unauthorised yard contains a mixture of family members and also other households without a permanent base who use it when they are not travelling. The spokesman for this site is seeking a 10 plot site to meet the needs of Travelling Showpeople without a base in the area. The current site is not occupied by 10 households on a permanent basis, but households are described as pulling on and off the site and the spokesman states that there are 10 households seeking plots in the area. However, we would note that when visited by Council officers the site has never been observed to contain more than 3 caravans.

7. Future Site Provision

Pitch Provision

- 7.1 This section focuses on the extra pitch provision which is required in Central Bedfordshire currently and over the next 18 years to 2031 by 5 year segments. This includes both current unmet needs and needs which are likely to arise in the future.
- 7.2 We would note that this section is based upon a combination of the on-site survey, planning records and waiting list information. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 7.3 This section concentrates not only upon the total extra provision which is required in the area, but whether there is a need for any transit sites and/or emergency stopping place provision. The calculation will be firstly provided for Gypsies and Travellers, before being repeated for Travelling Showpeople.
- 7.4 Before commencing on the identification of future needs we would wish to note some key points. In 2010 the Coalition Government announced the planned abolition of all Regional Spatial Strategies and the advent of the Localism Act 2011, National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. It should be the case that Local Plans rapidly replace the RSS as material consideration in planning decisions.
- 7.5 To identify future need, the March 2012 CLG document 'Planning Policy for Traveller Sites', requires an assessment for future pitch requirements, but does not provide a suggested methodology for undertaking this calculation. However, in October 2007 Department of Communities and Local Government produced 'Gypsy and Traveller Accommodation Needs Assessments: Guidance'. As with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue for residential pitches is to compare the supply of pitches available for occupation with the current and future needs of the households. The key factors in each of these elements are set out below:

Supply of pitches

- 7.6 Pitches which are available for use can come from a variety of sources. These include
- » Currently vacant pitches;
 - » Any pitches currently programmed to be developed within the study period;

Current Need

- 7.7 There are three key components of current need. Total current need) is:
- » Households on unauthorised developments for which planning permission is not expected;
 - » Concealed households; and
 - » Households in brick and mortar wishing to move to sites;

Future Need

- 7.8 There are three key components of future need. Total future need is simply the sum of the following:
- » Households living on sites with temporary planning permissions;
 - » New household formation expected during the study period; and
 - » Net migration to sites.
- 7.9 We will firstly provide the model as set out above for Gypsies and Travellers before repeating the calculation for Travelling Showpeople.

Current Gypsy and Traveller Site Provision

- 7.10 There are currently 47 pitches on public sites and 186 pitches on private sites in Central Bedfordshire on private sites with permanent permissions. A further 10 pitches have temporary permission and with 4 pitches having no planning permission. A full list of sites is shown in Appendix A.
- 7.11 The next stage of the process is to assess how much space is, or will become available on existing sites.
- 7.12 ORS interviewers identified some unoccupied pitches on private sites and also two non Gypsy and Traveller households on private sites. One pitch is currently advertised as being for sale on the Rightmove website. However, there is no evidence that the empty pitches on the private sites are available for more general use and therefore there is no evidence of significant unoccupied private pitches.
- 7.13 During the course of 2013, the council has granted permanent planning permission for 45 pitches in Central Bedfordshire. However most of these pitches have been the granting of permanent permission to sites which were previously unauthorised or had temporary permissions and therefore do not counts as available supply. However, 3 pitches at Evergreen, Tilsworth and 4 pitches at the Stable Site A in Billington have not yet been implemented and can be counted as future supply. Other permissions may also have not been implement, but we do not have firm evidence for these and have chosen not to count them as supply. It is also the case that the Timberlands site at Slip End is due to re-open follow refurbishment and will add 6 more pitches to the supply in Central Bedfordshire, giving a total of 13 pitches of additional supply.

Additional Site Provision: Current Need

- 7.14 The next stage of the process is to assess how many households are currently seeking pitches in the area. Groups of people who are likely to be seeking pitches will include those:
- » Households on unauthorised developments for which planning permission is not expected;
 - » Concealed households; and
 - » Households in brick and mortar wishing to move to sites;

Current Unauthorised Developments

- 7.15 There are currently 2 households on unauthorised developments in Central Bedfordshire so we have allowed for 2 pitches to accommodate these households. This figure excludes a 2 pitch long-term site.

Concealed Households

- 7.16 The household survey also sought to identify concealed households who require a pitch immediately. A concealed household is one who is living within another household and would wish to form their own separate family unit, but are unable to do so because of a lack of space on public or private sites.
- 7.17 The household survey contains two main sources of information on concealed households. Firstly it asks how many households live on a pitch. In one case, 4 households were on a pitch and all were interviewed with the pitch containing 17 people. Another 2 households were interviewed sharing at a plot with 12 people and can also be considered to be a concealed household. There was also a pitch on public sites which reported a second household and the waiting list for public sites contains 4 households who have provided an existing plot at a public site as a point of contact. Therefore, in total the households survey directly identified 4 concealed households on private sites who stated that they were occupying multiple pitches and there are 4 households linked to public sites seeking a pitch.
- 7.18 However, a further source of information on concealed households is those who stated that they do not live at the pitch permanently, but that they do not have a permanent address. In this case the household survey contained 4 households in this situation. In all cases they stated that they were staying with friends or family. There is no firm indication that these households are concealed and living at the address, but also they do not have a permanent address. We have therefore allowed for these to be considered as concealed households on the basis that the interviewee may not wish to cause problems for the main pitch occupier and therefore are not declaring their I status.
- 7.19 In total this leads to the on-site survey identifying a total of 8 concealed households in private sites. The on-site survey had a response rate of just below 50% of all pitches, so as a pragmatic solution we have doubled this figure to give a total of 16 concealed pitches on private sites and 4 on public sites.
- 7.20 This figure of 20 concealed households represents a total potential number of concealed households in the survey data. It is noteworthy that only 2 household on a private site and the 4 on the waiting list indicated a desire to move to another pitch, with the remainder not stating any interest in moving. The remaining households appear to be content at their current location and in some cases it may be possible to address their needs without needing to move them to another pitch such as through varying site licenses.

Bricks and Mortar

- 7.21 Identify households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. A recent report in Central Bedfordshire by the Ormiston Children and Families Trust entitled the 'The support needs of Gypsies and Travellers in Central Bedfordshire (October 2012) spoke to 12 households living in bricks and mortar in Central Bedfordshire.
- 7.22 One possible source of information on bricks and mortar households is the public site waiting list. The method of registering a desire to obtain a pitch on a public site is through placing your name on the waiting list held by Central Bedfordshire Council. Currently there are 19 households in total on the waiting list for a site in Central Bedfordshire. 4 have provided a contact address at a public site in Central Bedfordshire, while 5 are on sites in other local authorities. These households are typically not counted to prevent double counting between local authorities. 3 of the remaining households are on unauthorised sites or homeless, while 4 are on private sites. This leave 3 households in bricks and mortar in Central Bedfordshire We are not able to directly compare individual details of those on the waiting list with those in the on-site

survey due to data protection issues, but the overall site address for those on the waiting list matches the sites the sites where concealed households were found, so we do not consider that these household require to be counted again.

- 7.23 ORS worked with stakeholders, the Local Authority, on-site interviewees and also through advertising on Friends, Family and Travellers Facebook page to identify households in bricks and mortar. This process yielded 6 interviews, one of whom wished to move from their current home to a site, but confirmed that they were on the site waiting list and hence do not need to be counted again.
- 7.24 We would also note that for a number of recent studies undertaken by ORS we have worked with national Gypsy and Traveller representatives to identify households in brick and mortar. For a number of recent studies the representatives reported over 100 known households in housing and they encouraged them to come forward to take part in the survey. The actual number who eventually took part in the surveys ranged from zero to six household per area, and not all wished to move back to sites. Therefore, while there is anecdotal evidence of many Gypsies and Travellers in housing most appear to be content to remain there and when provided with the opportunity by national representatives to register an interest in returning to sites few choose to do so.
- 7.25 It is also the case that within most face to face survey undertaken on-site by ORS a small number of households are seeking to move to bricks and mortar. Therefore, it should be remembered that movement between housing and sites runs in both directions. However, in this case no households wished to move from sites to housing.

Additional Site Provision: Future Need

- 7.26 The next stage of the process is to assess how many households are likely to be seeking pitches in the area in the future. Groups of people who are likely to be seeking pitches will include those:
- » Households living on sites with temporary planning permissions;
 - » New household formation expected during the study period; and
 - » Net migration to sites.

Temporary Planning Permissions

- 7.27 Central Bedfordshire currently has a developed site with temporary planning permission for 4 pitches and a further undeveloped site with temporary permission for 6 pitches. The permissions will expire within the next 5 years, they have therefore been counted as need within this assessment, but not as a supply of pitches.

New Household Formation

- 7.28 Many studies of Gypsy and Traveller populations assume a net growth in the population of around 3% per annum, and this figure was used in the East of England Regional plan. However, a 3% per annum growth rate will see household numbers double in 23.5 years and this figure has been widely used without any clear underlying evidence to support it.

- 7.29 In a study on behalf of Office of the Deputy Prime Minister in 2003 (Local Authority Gypsy and Traveller Sites in England Office of the Deputy Prime Minister, 2003), Pat Niner identified that household growth rates of 2%-3% per cent a year were appropriate when projecting future formations.
- 7.30 In October 2007 the Department of Communities and Local Government issued guidance for conducting Gypsy and Traveller Accommodation Assessments. On page 25 this provides a worked example using a 3% per annum household formation rate, but notes in footnote 6 that:
- ‘The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count.’*
- 7.31 Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates. This position was confirmed by the Planning -Economy and Society section of Department Communities and Local Government who at a Westminster ‘Gypsy & Traveller Briefing 2013: Planning Policy Progress & Delivery’ on October 15th 2013 to 32 local authority participants stated:
- ‘3% is not policy.’
- 7.32 ORS have produced a detailed separate paper ‘Household Formation Rates for Gypsies and Travellers: Technical Note’ which demonstrates that the likely rate of growth for the population of Gypsies and Travellers across the whole of England based upon the best available evidence is closer to 1.5% per annum. Officials from Communities and Local Government have seen the technical note and confirmed that they have not undertaken any research on population or household growth for Gypsies and Travellers, and therefore have no information which contradicts this position.
- 7.33 A population growth rate of 1.5% will not necessarily equate to a household growth rate of 1.5%. Instead household growth rates may be higher. For example, across the whole of England for the whole population, the Office for National Statistics project in their 2011 based population highlight a natural change in the population of 0.5% per annum and an overall change of 0.83% per annum when the effects of migration are added. 2011 based household projections produced by Communities and Local Government show a projected rise in households on 0.95% per annum.
- 7.34 ORS believe that the 3% figure often used in Gypsy and Traveller Accommodation Assessments is demonstrably too high to be used as a fixed value for all studies and is not based upon any form of robust evidence. Instead we believe that a range of values should be considered in light of local evidence.
- 7.35 While acknowledging that there are currently a small number of pitches in Central Bedfordshire which are vacant we have used the 247 pitches on site, plus 3 households in bricks and mortar and 20 concealed households as a baseline for the growth in the population minus 13 pitches empty due to them being future supply and 2 pitches occupied by non travellers. This gives a total of 255 households for future formations. The table overleaf shows the projected number of pitches required for household formations for different rates of compound growth.

Figure 8
Extra Pitches Required in Central Bedfordshire from 2014-2031 for Household Formations using Different Growth Rates

Growth rate per annum	Number of additional pitches required over 18 years
1.5%	78
1.75%	93
2%	109
2.25%	126
2.5%	143
2.75%	161
3%	179

- 7.36 Given a projected growth in the national population of around 1.5% per annum, ORS favour a more pragmatic approach to household formation rates and typically use values between 2% and 2.5% depending upon local circumstances. This allows for households formation to occur quicker than population growth and provides for a buffer within the needs assessment to prevent any under-estimation of needs. In this case we have based our overall figures on a 2.5% per annum compound growth rate, but would note that much of the recent delivery of pitches in Central Bedfordshire has been to address the expansion of family owned sites, thus allowing formations to occur.
- 7.37 When including the impact of compound growth, a 2.5% growth per annum provides for 16% growth over 6 years, 31% growth over 11 years, 48% growth over 16 years and 56% over 18 years. We would note that extrapolating ONS and CLG population projections for this time period will see the population of Central Bedfordshire rise by 10% due to natural change with a further 10% due to migration. Overall household numbers are projected to rise by around 23% in the period 2013-2031 from CLG household projections.

In-migration from Other Sources

- 7.38 The most complicated area for a survey such as this is to estimate how many households will require accommodation from outside the area. Potentially Gypsies and Travellers could move to the Central Bedfordshire from anywhere in the country. The number of household seeking to move to Central Bedfordshire is likely to be heavily dependent upon pitch provision elsewhere. It has been noted that a weakness of many Gypsy and Traveller Accommodation Assessments conducted across the country has been that they either allowed for out-migration without in-migration which led to under-counting of need, or they over-counted need by assuming every household visiting the area required a pitch.
- 7.39 Overall the level of in-migration to the Central Bedfordshire is a very difficult issue to predict. We have allowed for a balanced level of migration on to existing private sites. The advantage of allowing for net migration to sum to zero is that it avoids the problems seen with other Gypsy and Traveller Accommodation Assessments where the modelling of migration clearly identified too low or high a level of total pitch provision. An assumption of net nil migration implies that the net pitch requirement is driven by locally identifiable need.

7.40 Beyond this number, rather than assess in-migrant households seeking to develop new sites in the area, we would propose that each case is assessed as a desire to live in the area and that site criteria rules are followed for each new site.

Overall Needs for Central Bedfordshire

7.41 The estimated extra site provision that is required until 2031 using a medium 2.5% per annum compound growth rate is 165 pitches. This includes the existing households on unauthorised sites, concealed households, those in housing, those with temporary planning permissions and the growth in household numbers due to household formation. Including the 45 pitches granted planning permission in 2013 this would see the number of authorised pitches rise by 210 in 19 years to 2031 which is a figure of 112%, at the same times as housing figures are projected to rise by less than 25%. If Central Bedfordshire wished to consider using a 3% compound growth rate, this figure would rise by 36 pitches and if they wished to use a 2% per annum growth rate the figure would fall by 34 pitches.

Figure 9
Extra Pitches which are Required in Central Bedfordshire from 2014-2031 when using a 2.5% compound growth rate

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	7	
Additional supply new sites	-	6	
Total Supply		13	
Current Need			
Current unauthorised developments or encampments and seeking to stay in the area	2	-	
Concealed households	20	-	
Net movement from bricks and mortar	3	-	
Total Current Need	25		
Future Needs			
Currently on sites with temporary planning permission	10	-	
Net migration to the area	0	--	
Net new household formation	143	-	
Total Future Needs	153	-	
Total	178	13	165

Requirement by Time Periods

7.42 The evidence contained in this survey is that there is a requirement in the next 6 years for a total of 35 pitches to address the backlog of need for households on unauthorised sites, concealed households, those in bricks and mortar plus those households who will see their temporary planning permissions expire within this time period. However, 13 pitches will come back into use on new or re-developed sites. Household growth then requires to be added, with all the possible scenarios set out in the table overleaf.

Figure 10
Extra Pitches Required in Central Bedfordshire from 2014-2031 by Time Period for Different Household Formation Rates

Growth rate per annum	2014-2019	2020-2024	2025-2029	2030-2031	Total
1.5%	46	22	23	10	100
1.75%	50	26	28	12	115
2%	54	30	33	14	131
2.25%	58	34	38	17	148
2.5%	63	39	44	19	165
2.75%	67	44	50	22	183
3%	71	48	56	25	201

Transit/Emergency Stopping Site Provision

- 7.43 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of around 13 weeks and has a range of facilities such as water supply, electricity and amenity blocks.
- 7.44 An alternative to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it, but has much more limited facilities with typically only a source of water and chemical toilets provided. Some authorities also operate an accepted encampment policy where households are provided with access to lighting, drinking water, refuse collection and hiring of portable toilets at a cost to the Travellers.
- 7.45 The Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62A of the Criminal Justice and Public Order Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- 7.46 A suitable pitch on a relevant caravan site is one which is situated in the same local authority area as the land on which the trespass has occurred, and which is managed by a local authority, registered social landlord, or other person or body as specified by order by the Secretary of State. Case law has confirmed that a suitable pitch must be somewhere where the household can occupy their caravan and bricks and mortar housing is not a suitable alternative to a pitch.
- 7.47 Therefore, a public transit site both provides a place for households in transit to an area and also a mechanism for greater enforcement action against inappropriate unauthorised encampments.
- 7.48 There is currently no operational public transit site in Central Bedfordshire. Therefore, the Section 62A provision cannot currently be enacted.
- 7.49 Central Bedfordshire have followed a policy of 'sensitive management', an approach which addresses the need for proper judgement in policy response according to the nature of the site, the Gypsy or Traveller group and the concerns of residents and businesses. This balanced approach has minimised the need for

formal legal action. There is little evidence that there is sufficient unauthorised encampments in Central Bedfordshire or that these are causing significant problems. However, the development of a formal public transit site would enable the Council to use the 62A provision should unauthorised encampments occur.

Needs for Plots for Travelling Showpeople

- 7.50 The estimated need for plots for Travelling Showpeople in Central Bedfordshire is much simpler to model than for Gypsies and Travellers. There are 4 concealed households who are currently working with the council to find a new site. A further group of Travelling Showpeople are working with the council to find a site for up to 10 households. These households are on a mixture of those on an unauthorised site or have no permanent base.
- 7.51 However, as noted earlier in this report, when visited by Council officers the site has never been observed to contain more than 3 caravans. Using the principals applied for Gypsies and Travellers this site would count as an unauthorised development of 3 pitches. However, it is accepted that other households are also seeking a site in the area and do use the unauthorised site. Therefore as a pragmatic solution we have allowed for 7 households associated with this site and for a relatively high rate of future formations to accommodate further households.
- 7.52 For household growth, the typical growth rate for the Travelling Showpeople population is typically lower than for Gypsies and Travellers with estimates normally being from 1%-1.5% and we have used the higher of these figures to allow for future household growth. A growth rate of 1.5% provides for total net growth of 31% over 18 years. Given the current 47 occupied plots in Central Bedfordshire this will equate to 14 additional plots by 2031.

Figure 11
Extra Plots which are Required for Travelling Showpeople in Central Bedfordshire from 2014-2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
Total Supply		0	
Current Need			
Current unauthorised developments or encampments and seeking to stay in the area	7	-	
Concealed households	4	-	
Movement from bricks and mortar	0	-	
Total Current Need	11		
Future Needs			
Currently on sites with temporary planning permission	0	-	
Net migration	0	--	
Net new household formation	14	-	
Total Future Needs	14		
Total	25	0	25

^{7.53} Therefore, over the next 18 years, the total requirement for Travelling Showpeople is 25 plots. Of these the identified requirement in the period 2014-2019 is 15 plots. From 2020 onwards all future project growth is for household formations. In the period 2020-2024 this is projected to be 4 plots, for 2025-2029 this is projected to be 4 plots and for 2030-2031 it will be 2 plots.

8. Conclusions

Introduction

- 8.1 This chapter brings together the evidence presented earlier in the report to provide some key policy conclusions for Central Bedfordshire. It focuses upon the key issues of future site provision for Gypsies and Travellers and also Travelling Showpersons.

Gypsy and Traveller Future Pitch Provision

- 8.2 Based upon the evidence presented in Chapter 7, there is a requirement in the next 6 years for a total of 35 pitches to address the backlog of need for households on unauthorised sites, concealed households, those in bricks and mortar plus those households who will see their temporary planning permissions expire within this time period. However, 13 pitches will come back into use on new or re-developed sites. Household growth then requires to be added, with all the possible scenarios set out in the table below.

Figure 12
Extra Pitches Required in Central Bedfordshire from 2014-2031 by Time Period for Different Household Formation Rates

Growth rate per annum	2014-2019	2020-2024	2025-2029	2030-2031	Total
1.5%	46	22	23	10	100
1.75%	50	26	28	12	115
2%	54	30	33	14	131
2.25%	58	34	38	17	148
2.5%	63	39	44	19	165
2.75%	67	44	50	22	183
3%	71	48	56	25	201

- 8.3 ORS favour a pragmatic approach to household formation rates and typically use values between 2% and 2.5% depending upon local circumstances. This allows for households formation to occur quicker than population growth and provides for a buffer within the needs assessment to prevent any under-estimation of needs. In this case we have based our overall figures on a 2.5% per annum compound growth rate, but would note that much of the recent delivery of pitches in Central Bedfordshire has been to address the expansion of family owned sites, thus allowing formations to occur.

Travelling Showperson Requirements

- 8.4 There are only three sources of requirements for the Travelling Showperson population in Central Bedfordshire, namely 4 concealed households, an unauthorised site and the growth in the population over time. Central Bedfordshire has a requirement for 25 extra plots for Travelling Showpeople to 2031.

Appendices

Appendix A: Gypsy and Traveller Sites in Central Bedfordshire (November 2013)

Figure 13
Current Gypsy and Traveller Sites and Pitches in Central Bedfordshire

Site	Number of Pitches
Local Authority Sites	
Potton Gypsy Site, Common Road, Potton	14
Chiltern View, Northall Road, Eaton Bray	27
Timberlands, Half Moon Lane, Pepperstock, Slip End	6
TOTAL PITCHES ON LOCAL AUTHORITY SITES	47
Private Sites with Permanent Permission	
Old Cartwheel Nurseries, A1 Sandy, Great North Road, Sandy	15
Talamanca Gypsy Site, 63 Great North Road, Sandy	15
Little Acre, Langford Road, Biggleswade	3
Magpie Farm, Hill Lane, Upper Caldecote	7
145 Chapel End Road, Houghton Conquest	2
Twin Acres, Hitchin Road, Arlesey	4
Woodside Caravan Park, Thorncote Road, Hatch, Sandy	3
Land at 197 Hitchin Road, Arlesey	10
North Star Cottage, Watling Street, Hockliffe	1
Jockey Farm, Watling Street, Caddington	15
28 & 30 Stanbridge Road, Billington	7
Toddbury Farm, Gypsy Lane, Little Billington	18
Old Acres, Old Acre Paddock, Barton Road, Pulloxhill	8
Home Farm, Dunstable Road, Tilsworth	1
Evergreens, Dunstable Road, Tilsworth	8
Valley View, Hemel Hempstead Road, Dagnall	1
Land Adjacent to 17 The Causeway, Clophill	1
The Stables Gypsy Lane, Little Billington	10
Greenacres, Gypsy Lane, Little Billington	14
The Stables Site A, Stanbridge Road, Billington	11
The Stables Site C, Stanbridge Road, Great Billington	4
Ash Tree Paddock, Stanbridge Road, Billington	3
Little Acre, Half Moon Lane, Pepperstock, Slip End	2
Greenvale, Watling Street, Caddington	14
Eversholt Beeches, Watling Street, Caddington	5
TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION	182
Private Sites with Temporary Permission	
Chestnut Caravan Park, Steppingley Road, Tingrith	4

Mile Tree Road, Leighton Buzzard	6
TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION	10
Tolerated Sites – Long-term without planning permission	
Hermitage Lane, Off Westoning Road, Greenfield	2
TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES	2
Unauthorised Developments	
Plot 4 , The Stables, Billington	1
Valley View, Hemel Hempstead Road, Dagnall	1
TOTAL PITCHES ON UNAUTHORISED DEVELOPMENTS	2
TOTAL PITCHES	243

Figure 14
Current Travelling Showpeople Yards and Caravans in Central Bedfordshire

Site	Number of Caravans
Showpeople Yards with Permanent Permission	
Gogs Farm, Old Linslade Road, Linslade	4
Greenacre Farm, Billington Road, Stanbridge	3
Land at junction of Bridleway and Luton Road, Fancott	3
TOTAL CARAVANS ON SITES WITH PERMANENT PERMISSION	10
Tolerated Sites – Long-term without planning permission	
Land off Mill Lane, Biggleswade	16
21 Sun Street, Biggleswade	3
Bridge Meadow, Leighton Buzzard	7
TOTAL CARAVANS ON LONG-TERM TOLERATED SITES	26
Unauthorised Developments	
Hawthorne	3-10 (counted 7 as need)
TOTAL CARAVANS ON UNAUTHORISED DEVELOPMENTS	7
TOTAL CARAVANS	43

HOUSEHOLD FORMATION RATES FOR GYPSIES AND TRAVELLERS

TECHNICAL NOTE

November 2013

Version 1.0

1. Household Formation Rates

Introduction

- 1.1 The rate of future household formations is a key component to any housing assessment, and is particularly important for Gypsy and Traveller Accommodation Assessments. The relative youthfulness of Gypsy and Traveller populations implies that they are likely to grow more quickly than the wider population and therefore will see a higher proportionate rate of new household formation.
- 1.2 Despite the importance of household formations in Gypsy and Traveller Accommodation Assessments, very little work has been undertaken to assess the likely rates of new formations.

History

- 1.3 At the outset we would note that all studies below use net household formation which is the gross household formation rate, minus any loss of households through dissolution.
- 1.4 In a study on behalf of Office of the Deputy Prime Minister in 2003 (Local Authority Gypsy and Traveller Sites in England Office of the Deputy Prime Minister, 2003), Pat Niner identified that household growth rates of 2%-3% per cent a year were appropriate when projecting future formations.
- 1.5 In October the Department of Communities and Local Government issued guidance for conducting Gypsy and Traveller Accommodation Assessments ('Gypsy and Traveller Accommodation Needs Assessments: Guidance'). On page 25 this provides a worked example using a 3% per annum household formation rate, but notes in footnote 6 that:

'The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count.'

- 1.6 Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates.
- 1.7 A further key source of information for the use of household formation rates were Regional Spatial Strategies (RSS) which were either produced, or in production across the whole country until their planned abolition was announced in 2010. All of the RSS across the country used a household formation rate of 3% per annum for Gypsies and Travellers. However, none of the published documents (such as 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009') provide any evidence for this position. Instead the 3% simply forms part of the calculation.
- 1.8 Therefore, while there is precedent for using a net household formation rate of 3% per annum for Gypsies and Travellers there is little published evidence to justify this position. This document seeks to bring together all available information on household formation rates to provide a more robust position to assess the appropriate rates to use on future assessments.

Compound Growth

- 1.9 A net household growth rate of 3% does not imply that household numbers will double in 33 years (100/3). Instead the impact of compound growth where the 3% for any year is added to the base population and any subsequent household growth implies that the doubling of household numbers will occur much more quickly. For 3% compound growth the time it would take to double the household numbers is 23.5 years.
- 1.10 The table below shows the impact of a range of compound growth rates on how long they would lead to the household numbers doubling. If the growth rate was 1.5% per annum household numbers would double in 46.5 years.

Figure 1
Compound Growth Rates and Time Taken for Household numbers to Double

Growth Rate per Annum	Time Taken for Household Numbers to Double
3%	23.5 years
2.75%	25.5 years
2,5%	28 years
2,25%	31 years
2%	35 years
1.75%	40 years
1.5%	46.5 years

Evidence for Household Growth

- 1.11 A key source of quantitative information available on Gypsy and Traveller communities derives from a bi-annual survey of Gypsy and Traveller caravans which is conducted by each local authority in England on a specific date in January and July of each year. This count is of caravans and not households which makes it more difficult to interpret for a study such as this.
- 1.12 In January 1979, the date of the first count, there were 8,300 caravans recorded on sites across England. On the date of the most recent count in January 2013 there were 18,729 caravans counted. This equates to a rise of 126% over 34 years. This represents a rise of just over 2.4% per annum. The January 2013 count was lower than the figure for July 2012, but even using that figure sees a growth rate of 2.5% per annum.
- 1.13 Therefore, the number of caravans being counted on sites across England has been growing over the past 34 years at close to 2.5% per annum. There are good reasons for think that this is an overestimate of household formation rates. These include:
- There has been a significant in-migration of Irish Traveller households to England in the past 34 years. While many Irish Travellers have been established in England since before 1979, many are more recent migrants and this will have boosted caravan numbers through migration, not formations;

- Many pitches across the country are sub-let or partially occupied by non Travellers. ORS has visited many hundreds of pitches across the country with non Traveller occupants. These households will again potentially boost caravan count numbers without representing a growth in the number of Gypsy and Traveller households.

1.14 Therefore ORS would consider that 2.5% represent a high end estimate of the growth in the number of caravans on sites nationally due to formations, with the real rate of growth from Gypsy and Traveller household formations being lower than this figure.

Evidence for Population Growth

- 1.15 There are two main sources of information for the rate of population growth for the Gypsy and Traveller community, namely the UK Census of Population 2011 and ORS' own household survey data which includes over 2,000 face to face surveys since the start of 2012. These provide a supporting picture for the likely rate of growth among the Gypsy and Traveller population.
- 1.16 The ethnic status question from the UK Census of Population 2011 for the first time included Gypsy and Irish Traveller as an ethnic category. While it is accepted that non response bias has underestimated the total size of the Gypsy and Traveller population in the Census, the age profile it provides mirrors that obtained by ORS in household surveys. Therefore, there is strong reason to believe that the age profile shown in UK Census of Population 2011 is a valid reflection of the true age profile of the population.
- 1.17 The table below shows this age profile. Assuming that no deaths occur, for a population to double every 23.5 years (3% compound growth), half the population should be under 23.5 years and half should be over 23.5 years. In fact the midway point for the Gypsy and Traveller population is 26 years. Allowing for deaths, the number of younger people in the population must be even higher for the population to double and therefore the age profile of the Gypsy and Traveller population does not come close to doubling in 23.5 years.

Figure 2
Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9
Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

Modelling Population Growth Rates

- 1.18 ORS undertook demographic modelling to illustrate the true likely rate of growth in the Gypsy and Traveller population. For this we used PopGroup, the leading software in population and household forecasting.
- 1.19 The two key inputs to the PopGroup model are birth rates and death rates. For birth rates much detailed work has been undertaken in Hungary and this has shown that for their Roma population total fertility rates (TFR) are around 3. This implies the each woman on average can be expected to have three children who reach adulthood. By comparison the TFR for the whole UK population is current just below 2. ORS have not been able to find an equivalent work for the UK Gypsy and Traveller community. The links below provides more information on the Hungarian Roma population.

<http://www.romaniworld.com/cessmod01.htm>

<http://www.tarki.hu/adatbank-h/kutjel/pdf/a779.pdf>

- 1.20 While not directly applicable in this case, a TFR of 3 is consistent with ORS' survey data. This shows the average Gypsy and Traveller women aged 32 years has on average 2.5 children. From this point onwards children start to leave home, so we are not able to follow this through to a full TFR, but we have used 3 in our modelling. We would also note that the equivalent figure for a women aged 24 years in 1.5 children, which is significantly short of the number needed to double the population.
- 1.21 For death, the average life expectancy across the whole population of the UK is currently just over 80 years. However a report by Sheffield University found that the life expectancy of Gypsies and Travellers was 10-12 years less than this figure (Parry et al (2004) The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative, University of Sheffield). We have therefore, used an average life expectancy of 72 years in our model.
- 1.22 The impact of using a TFR of 3 and a life expectancy of 72 years for the Census population age profiles is that the Gypsy and Traveller population is projected to increase by 66% in the next 40 years. This equates to a growth rate of 1.25% per annum, well below 3% per annum.
- 1.23 In the most recent Office of National Statistics 2011 based Interim Population Projections the projected growth rate of the whole population of England to 2021 is 0.83% per annum. Of this 60% is due to natural change and 40% migration, so the rate of natural population growth in whole population of England is almost exactly 0.5% per annum. Therefore the figures modelled by ORS for Gypsies and Travellers show a population growth which is two and half times greater than for the whole population of England.
- 1.24 We would note that population and household growth rates do not run in parallel. The most recent Communities and Local Government 2011 based Household Projections convert these population projections to a projected household growth of 0.95% per annum. The difference between the two figures is due to the impact of an ageing population and more single older people in the population. However, this is being driven by an ageing population, while the Gypsy and Traveller population is relatively young. Therefore, a household growth figure not far in excess of 1.25% per annum is plausible and 3% is highly implausible.

Summary

- 1.25 Household formation rates are an important component of Gypsy and Traveller Accommodation Assessments, but little detailed work has been undertaken to assess their likely scale.
- 1.26 A growth rate of 3% has been commonly used in assessments, but no statistical evidence exists to support households growing this quickly. Caravan count data has shown the on-site number of caravans growing at less than 2.5% per annum and this is likely to be overstating formation rates with the national figure likely to be closer to 2% per annum.
- 1.27 Population modelling shows the true growth in the Gypsy and Traveller population may be as low as 1.25% per annum and this figure would be two and half times greater than the equivalent number for the settled community.
- 1.28 In practice the evidence supports using formation rates of between 1.5% and 2.5% per annum depending upon the relative youthfulness of the local area population. A figure of 3% net growth per annum would be exceptional and would require clear justification and statistical support before being used. In areas where an on-site survey indicates that there are few children in the population a lower figure may be used.

Gypsy and Traveller Local Plan

Pre-submission (May 2013)

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1. Introduction

- 1.1 Local authorities are required by Government, through the Housing Act 2004, to assess the accommodation needs of Gypsies and Travellers alongside the settled population, and develop a strategy that addresses any unmet need that is identified.
- 1.2 The Gypsy and Traveller Local Plan sets out how the Council will meet Gypsy and Traveller and Travelling Showpeople accommodation needs in Central Bedfordshire until 2031. It specifies the number of Gypsy and Traveller pitches and Travelling Showpeople plots required and identifies sites to meet this need. The plan also outlines the planning policies against which all planning applications for Gypsy and Traveller and Travelling Showpeople sites will be assessed.

National policy

- 1.3 The Department for Communities and Local Government (**DCLG**) published 'Planning Policy for Traveller Sites' (PPTS) in March 2012, to accompany the National Planning Policy Framework (NPPF). PPTS sets out the Government's policy approach to planning for Gypsy and Traveller and Travelling Showpeople sites, with the overarching aim to ensure fair and equal treatment for Gypsies and Travellers, in a way that facilitates the traditional and nomadic way of life whilst respecting the interests of the settled community.
- 1.4 Local Plans are required to set pitch targets for Gypsy and Travellers and plot targets for Travelling Showpeople which addresses the likely accommodation needs in the area, based on local evidence. The Plan is required to:
 - Identify a five year supply of specific deliverable sites and other, developable sites to accommodate growth for years 6-10 and where possible 11-15;
 - Ensure the number of pitches and plots reflect the size and location of a site, and the size of the surrounding population; and
 - Protect local amenity and the environment.
- 1.5 Consideration must also be given to the National Planning Policy Framework which sets out the Government's overarching planning policies for England, with the objective of contributing to the achievement of sustainable development.

Local policy

- 1.6 The Gypsy and Traveller Local Plan forms part of the statutory development plan for Central Bedfordshire. It sits alongside the Development Strategy, which sets out the overall approach to new development in Central Bedfordshire for the period to 2031. PPTS requires Gypsy and Traveller plans to outline provision for fifteen years, which is up to 2028 in the case of Central Bedfordshire. However, the Council has resolved to plan up to 2031 to bring the Gypsy and Traveller Local Plan in line with the Development Strategy.
- 1.7 The Gypsy and Traveller Local Plan specifies the number of Gypsy and Traveller pitches and Travelling Showpeople plots required in Central Bedfordshire and identifies sites that will deliver these pitches and plots over the plan period. The document also contains planning policies against which all planning applications for Gypsy and Traveller and Travelling Showpeople sites will be assessed. Policies contained within the Development Strategy will also apply when considering planning applications for Gypsy and Traveller and Travelling Showpeople development.

Purpose of the Gypsy and Traveller Local Plan

- 1.8 Everyone should have the opportunity for a decent home. Travelling is an integral part of cultural identity for Gypsy and Traveller households. It is legally accepted that nomadism, and living in a caravan is a reflection of the cultural heritage of Gypsy and Irish Traveller families, not simply a lifestyle choice. Gypsies and Travellers are recognised ethnic groups and are entitled to the same access to housing as the settled community.
- 1.9 Local Authorities have a statutory duty to assess the accommodation needs of Gypsies and Travellers and develop a strategy to address unmet need. There are also practical reasons for making provision for Gypsy, Traveller and Travelling Showpeople accommodation. Gypsies and Travellers can sometimes find themselves in a cycle of 'enforced' nomadism, being continually moved on by the authorities because of the shortage of authorised sites. As a result, Gypsies and Travellers are often more disadvantaged than any other ethnic group in terms of access to healthcare and education. The lack of authorised public sites and the difficulties associated with getting planning permission for private sites, has meant Gypsies and Travellers have to set up home on land belonging to others or on their own land without permission.
- 1.10 If provision is not made for enough authorised sites, unauthorised camping is likely to continue. The problems associated with unauthorised sites, such as the costs of taking enforcement action, the tension that exists between Gypsies and Travellers and the settled

community and the social exclusion experienced by Gypsies and Travellers on unauthorised sites, will continue. The aim of this Local Plan is to reduce the occurrence of unauthorised sites by making sufficient new provision for Gypsies and Travellers in the area.

Sustainability Appraisal

- 1.11 The Strategic Environmental Assessment (**SEA**) Directive requires the assessment of environmental impacts of actions contained in a wide range of plans and programmes, including planning policy documents. SEA and Sustainability Appraisal (**SA**) are very closely linked. SA aims to integrate sustainability into decision making by appraising the plan using environmental, social and economic objectives. SEA also aims to facilitate sustainable development, but its emphasis is on integrating environmental considerations into decision making through a thorough analysis of environmental issues.
- 1.12 Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process. The SA therefore incorporates the requirements of both the Planning and Compulsory Purchase Act and the SEA Regulations. A Sustainability Appraisal, incorporating an SEA, has been undertaken which should be considered together with the Gypsy and Traveller Local Plan.

The Habitats Directive

- 1.13 When preparing planning policy documents, the Council needs to assess whether an 'Appropriate Assessment' is required under the European Directive 92/43/EEC – The Habitats Directive. The Habitats Directive establishes a network of internationally important sites designated for their ecological status, and requires the maintenance or restoration of wildlife habitats and species of interest to a favourable condition. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no Natura 2000 or Ramsar sites in Central Bedfordshire. There are 5 European sites outside of the Council's boundary but within the potential influence of the plan.
- 1.14 The Sustainability Appraisal concludes that the Gypsy and Traveller Local Plan would have no adverse effects on these sites, either alone or in combination with other plans.

Site Assessment

- 1.15 Planning Policy for Travellers Sites states that local planning authorities should identify enough deliverable sites to provide five years' worth of sites against locally set targets; and identify a supply of developable sites or broad locations for growth, for years six to ten and, where possible, for years eleven to fifteen.
- 1.16 In order to ensure that sufficient land is available to meet accommodation needs in Central Bedfordshire up to 2031, the Council conducted a call for sites in Spring 2012 inviting landowners to submit details of land for consideration as a Gypsy and Traveller or Travelling Showpeople site. The portfolio of Council owned land was also considered as part of this process.
- 1.17 Local planning authorities are required to ensure that sites are sustainable economically, socially and environmentally. In order to identify the most appropriate sites, each site was subject to a three stage assessment process:
- The first stage assessed sites in terms of their immediate suitability, such as being located within Flood Zone 3 or in an Area of Outstanding Natural Beauty (AONB). Sites that failed one of the criteria were instantly dismissed.
 - The second stage assessed sites against issues which could be mitigated, such as zones of lower flood risk, archaeology, access from the public highway, and landscape. A site could be dismissed at this stage if an issue couldn't be satisfactorily overcome.
 - The third stage used a scoring system to assess sites in terms of access to facilities and services, such as health, schools and public transport; the provision of utilities and servicing for waste and recycling; and whether the site is on greenfield or brownfield land.
- 1.18 This sequential approach allowed unsuitable sites to be filtered out. Sites must satisfy assessment at each level in order to pass onto the next. In identifying sites for allocation, additional considerations were made including the overall impact of a new site and its size on the nearest settlements and the preferences of the Gypsy and Traveller community of where they wish to live.
- 1.19 A full report on the site assessment process has been published as a Technical Report to this Pre Submission document. The Gypsy and Traveller Local Plan identifies sites to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Central Bedfordshire up to 2031. These sites are included in section 7 of this document.

Community engagement

- 1.20 A Consultation Statement has been prepared which sets out the consultation that has been undertaken during the preparation of the Gypsy and Traveller Local Plan. The Statement sets out how consultation activities have been advertised, who has been consulted and how they have been consulted. It also identifies the ways that people commented upon the Plan and the key issues that were raised.

What happens next?

- 1.21 The 'Pre-Submission' Gypsy and Traveller Local Plan is subject to formal consultation. Any representations received will be considered by a Planning Inspector, following submission to the Secretary of State (anticipated in October 2013). It is expected that following the Examination process and the consideration of the Inspector's Report, the Gypsy and Traveller Local Plan will be adopted in July 2014.

2. Vision and Objectives

- 2.1 The Gypsy and Traveller Local Plan has the following Vision, to ensure the delivery of sites to meet the required needs for the Gypsy and Traveller and Travelling Showpeople community in Central Bedfordshire up to 2031:

By 2031, Central Bedfordshire will provide a sufficient number of sustainable and high quality sites to meet the needs of the Gypsy and Traveller and Travelling Showpeople communities, enabling access to services and facilities. There will be a reduced incidence of unauthorised developments and encampments, and increased integration between the Gypsy and Traveller and Travelling Showpeople community and the settled community.

- 2.2 In order to meet this vision the Gypsy and Traveller Local Plan has the following objectives:

- 157 Gypsy and Traveller pitches and 22 Travelling Showpeople plots will be delivered between 2013 and 2031 to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople in Central Bedfordshire.
- The number of unauthorised sites will be minimised by identifying a supply of deliverable and developable sites throughout the Plan period.
- A supply of permanent sites will be delivered, providing stability for the Gypsy and Traveller and Travelling Showpeople communities and access to healthcare, education and other services.
- Provide a clear policy framework for making decisions on planning applications regarding Gypsy and Traveller and Travelling Showpeople sites in Central Bedfordshire.

3. Gypsy and Traveller Accommodation Need

What is a Gypsy and Traveller Pitch?

- 3.1 A pitch is the space required to accommodate one household and their caravans, parking space and enough room for the turning of vehicles. A study in the East of England found that the average Gypsy and Traveller household across the region would require a pitch able to accommodate 1.7 caravans. However, this will vary from area to area and according to family need. There is no-one size fits all measurement of a pitch, as in the case of the settled community, this depends on the size of the individual families and their particular needs.
- 3.2 Guidance from the Department of Communities and Local Government (DCLG) (Designing Gypsy and Traveller Sites Good Practice Guide 2008) states that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building; a large trailer and touring caravan (or two caravans); drying space for clothes/a small garden area; a lockable shed (for bicycles, wheelchair storage etc); and parking space for two vehicles. Smaller pitches must be able to accommodate at least an amenity building; a large trailer; drying space for clothes; and parking for at least one vehicle.

Gypsy and Traveller Accommodation Needs to 2031

- 3.3 Planning Policy for Gypsy and Traveller Sites states that local authorities should use a locally derived, robust evidence base to establish accommodation needs to inform the preparation of Local Plans and make planning decisions. In 2006 the Council, in partnership with other Bedfordshire local authorities, undertook a sub regional study to assess the accommodation needs of Gypsies and Traveller in Bedfordshire and Luton. This study provided an indication of the number of pitches required in between 2006 and 2011, and important observations on the specific needs of the Gypsy and Traveller community in Bedfordshire and Luton, which have been considered in preparing this Local Plan:
- The Gypsy and Traveller community prefer smaller sites. However, there was also some need identified for larger family pitches to accommodate larger modern trailers.
 - There was a strong preference for provision of family owned sites.
 - There was a desire for additional capacity to be provided on new sites to allow families to accommodate visitors.
 - Most households wished to remain in the area they are currently settled in.
 - The Gypsy and Traveller community were supportive of clear restrictions on the size of sites and where appropriate supported a

“cap” on the number of people living on a site on a permanent basis and for transit / visiting.

- The Gypsy and Traveller community wanted sites to be effectively managed.
- The Gypsy and Traveller community often supported a procedure for regular inspection of sites, covering the provision of basic facilities including water and sanitation, as well as health and safety.
- Many of the Gypsy and Traveller households within the study area are very settled, travel is predominately seasonal, and 81.1% of households in Bedfordshire and Luton had not travelled in the previous 12 months.

- 3.4 The national and regional planning policy context has changed significantly since the original study was completed in 2006. In January 2013 the Council therefore commissioned a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment to provide up to date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Central Bedfordshire up to 2031.
- 3.5 The assessment found a need for 157 additional permanent Gypsy and Traveller pitches in Central Bedfordshire between 2013 and 2031. In the first 6 year period (2013-2018) 65 pitches are required to address the backlog of need and household growth. The remaining 92 pitches are required to meet future household growth from 2018 to 2031.
- 3.6 A 2.5% compound growth rate has been used to identify likely need arising from household growth from 2013 to 2031. This is based on long term trends which indicate the number of Gypsy and Traveller caravans on site has increased by 134% nationally in the past 34 years, which equates to a net growth of around 2.5% per annum.

Table 1: Pitch Requirement at January 2013

Number of permanent pitches currently in Central Bedfordshire in 2013	182
Backlog	38
minus pitches coming back into use	-6
Total backlog at January 2013	32
Total backlog at January 2013	32
Add growth between 2013 and 2018 (2.5% pa)	+33
Add growth between 2019 and 2023 (2.5% pa)	+31
Add growth between 2024 and 2028 (2.5% pa)	+36
Add growth between 2029 and 2031 (2.5% pa)	+25
Total need from 2013 to 2031	157

Providing permanent Gypsy and Traveller Pitches

- 3.7 This Gypsy and Traveller Local Plan identifies sites to deliver 157 pitches to meet the accommodation need in Central Bedfordshire until the end of 2031. The Gypsy and Traveller housing trajectory that accompanies this Plan demonstrates the five year supply of specific deliverable sites and identifies other, developable sites to accommodate growth from years 6-19. Annual monitoring over the duration of the Plan period will ensure there is an appropriate, deliverable supply of sites.
- 3.8 Any windfall applications for Gypsy and Traveller accommodation will be considered against policies GT5, GT7 and GT8 and other relevant policies in the Development Strategy for Central Bedfordshire. The need for additional windfall sites will need to be demonstrated as part of any application. Any windfall planning permissions granted for Gypsy and Traveller pitches will contribute to the overall provision of need.

Policy GT1: Gypsy and Traveller Pitch Requirement

The Council will make provision for 157 pitches to meet identified Gypsy and Traveller needs in Central Bedfordshire up to the end of 2031.

Visitor Space and Transit Pitches

- 3.9 A preference was expressed in the 2006 Gypsy and Traveller Accommodation Assessment for permanent family sites with visitor spaces, which enable the Gypsy and Traveller community to accommodate members of their family who are visiting. A visitor space would be offered on a short term basis to visiting friends and families of the Gypsies and Travellers residing on the site. These pitches would be in addition to the permanent pitches on site. Any planning applications for visitor space will be considered against Policy GT5, GT7 and other relevant policies in the Development Strategy for Central Bedfordshire.

Policy GT2: Provision for Visitor Pitches

Provision will be made for visitor space on appropriate sites across Central Bedfordshire. Visitor space provision will be restricted to control the number of people visiting and their length of stay, to be determined on a site by site basis.

- 3.10 As well as visitor spaces, provision will be made for transit pitches. A transit pitch is intended for short term use by Gypsies and Travellers in transit. The pitch is itself permanent, while its residents are temporary, with a maximum period of stay imposed, usually by a site manager. Such sites are provided with basic amenities and services such as boundary fencing, hardstanding, water supply, toilet and washing facilities, waste disposal and (possibly) electricity. Permissions for transit pitches could restrict the size of sites and recommend a “cap” on the number of people allowed to stay on the pitch on a transit basis. There are opportunities for providing transit pitches on existing permanent sites. The appropriateness of sites for this purpose will be determined on a site by site basis using Policy GT5 to determine applications.

Policy GT3: Provision for Transit Pitches

Provision for transit pitches will be considered on sites with permanent provision, at site locations determined in accordance with GT5 and in consultation with the Gypsy and Traveller community. Transit provision will be restricted to control the number of people visiting and their length of stay, to be determined on a site by site basis.

4. Travelling Showpeople Accommodation Need

- 4.1 Travelling Showpeople are defined as members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers.

What is a Travelling Showpeople Plot?

- 4.2 Travelling Showpeople's needs are distinct to the needs of the wider Gypsy and Traveller community. Pitches on a Travelling Showpeople site are referred to as plots. Whilst Gypsy and Traveller pitches are typically residential, Travelling Showpeople plots are mixed-use which incorporate space or are split to allow for the storage and maintenance of equipment. The plots also provide secure, permanent bases for the storage of equipment. There is no-one size fits all measurement of a plot as in the case of the settled community, this depends on the size of the individual families and their particular needs.

Accommodation needs to 2031

- 4.3 The Council, working with the other Local Authorities in Bedfordshire, commissioned a separate Accommodation Needs Assessment for Travelling Showpeople (2007). This Assessment made projections of Travelling Showpeople Plot needs between 2007 and 2010.
- 4.4 The February 2013 Gypsy and Traveller and Travelling Showpeople Accommodation Assessment provided up to date evidence about the accommodation needs of Travelling Showpeople in Central Bedfordshire up to 2031. The Assessment found a need for 22 additional permanent Travelling Showpeople plots in Central Bedfordshire between 2013 and 2031. In the first period (2013-2018) 13 plots are required to address household growth and existing need. The remaining 9 plots are required to meet future household growth from 2019 to 2031.
- 4.5 A 1.5% compound growth rate has been used to identify likely need arising from household growth from 2013 to 2031. The growth rate for the Travelling Showpeople population is typically lower than Gypsies and Travellers at 1-1.5% per annum, and the higher rate was accepted by the Showman's Guild at the examination of the East of England Plan and is considered to remain a robust approach to calculating future growth in Central Bedfordshire.

Table 2: Pitch Requirement for Travelling Showpeople to 2031

Total existing pitches in 2012	25
Growth between 2013 and 2018 (1.5% pa)	13
Growth between 2019 and 2023 (1.5% pa)	3
Growth between 2024 and 2028 (1.5% pa)	4
Growth between 2029 and 2031 (1.5% pa)	2
Total need to 2031	22

Providing permanent Travelling Showpeople Plots

- 4.6 This Local Plan identifies sites to deliver 22 plots to meet the accommodation need in Central Bedfordshire until the end of 2031. The Gypsy and Traveller housing trajectory that accompanies this Plan demonstrates the five year supply of specific deliverable sites and identifies other, developable sites to accommodate growth from years 6-19. Annual monitoring over the duration of the Plan period will ensure there is an appropriate, deliverable supply of sites.
- 4.7 Any windfall applications for Travelling Showpeople accommodation will be considered against policies GT5, GT6 and GT7 and other relevant policies in the Development Strategy for Central Bedfordshire. The need for additional windfall sites will need to be demonstrated as part of any application. Any windfall planning permissions granted for Travelling Showpeople plots will contribute to the overall provision and meeting of need.

Policy GT4: Travelling Showpeople Plot Requirement

The Council will make provision for 22 plots to meet identified Travelling Showpeople needs in Central Bedfordshire up to the end of 2031.
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5. Consideration of New Sites and Expansion of Existing Sites

- 5.1 The following policies provide a more detailed policy framework against which planning applications for Gypsy and Traveller sites or pitches, visitor pitches, transit sites or pitches and Travelling Showpeople sites or plots will be assessed.
- 5.2 New sites should be planned sensitively to take account of the needs of both the travelling and settled communities. Issues of sustainability are important and relevant considerations include:
- The promotion of peaceful and integrated co-existence between the site and the local community;
 - The wider benefits of easier access to GP and other health services;
 - Access to local schools to enable Gypsy and Traveller children to attend school regularly;
 - A settled base that reduces the need for long distance travelling, and the possible environmental damage caused by unauthorised encampments;
 - Consideration of the effect of local environmental quality, such as noise or air quality, on the health and well being of any Gypsy and Travellers or on others as a result of the development;
 - Not locating sites in areas of high flood risk, and functional floodplains;
 - Access to local shops; and
 - Access to local employment opportunities.
- 5.3 In order to benefit from access to facilities and services such as health and education, first preference should be given to sites that are located closer to existing settlements. However, the results of the Bedfordshire and Luton Accommodation Needs Assessment (2006) did show that some Gypsy and Traveller families would prefer to live in the countryside, on privately owned and managed sites. Such locations will be considered where they are constraint free, or where any constraints could be satisfactorily mitigated.

Development in the Green Belt

- 5.4 National planning policy (NPPF and PPTS) suggest Gypsy and Traveller sites in the Green Belt will usually be considered inappropriate development. The Development Strategy for Central Bedfordshire confirms that there is a general presumption against inappropriate development, and planning permission will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt. Sites within the Green Belt will only be allocated to meet a specific identified need.

- 5.5 Where an existing site or extension to an existing site in the Green Belt is allocated through the plan-making process, the site will remain within or “washed over” by Green Belt as the Council wishes to protect Green Belt boundaries, retain its key characteristics of openness and permanence, and prevent the removal of small areas from the Green Belt
- 5.6 PPTS enables local planning authorities to make an exceptional limited alternation to the defined Green Belt boundary to accommodate a site inset within the Green Belt, to meet a specific identified need for a traveller site, only through the plan making process and not in response to a planning application. Central Bedfordshire intends to make one alteration to the defined Green Belt boundary, to enhance the deliverability of a new Gypsy and Traveller Site at Land West of Barton-Le-Clay (See policy GT10)

Assessing planning applications

- 5.7 Planning applications will be judged using the policies in this Local Plan and the relevant policies set out in the Development Strategy for Central Bedfordshire. Applications will be considered on their merits in the context of site size and location, and the characteristics of the surrounding area. Planning permissions might restrict the size of sites and where appropriate recommend a “cap” on the number of people allowed to live on the site on a permanent basis or the number of caravans being stationed on a site. Proposals for mixed residential and business uses should have regard to the safety and amenity of the occupants and neighbouring residents. Applications for business use will be assessed against the criteria included within Policy GT8. Consideration must also be given to site specific factors such as vehicular access from the public highway, as well as provision for parking, turning, servicing on site, and road safety for occupants and visitors.

Flood Risk

- 5.8 In accordance with Planning Policy for Traveller Sites, Gypsy and Traveller sites should not be permitted in areas of high flood risk as they are considered as highly vulnerable development. In areas of flood risk, where a site is otherwise considered suitable for development, a flood risk assessment will be required to identify the extent of flood risk and recommend alleviation and mitigation measures necessary to address the problem. Sites will only be permitted where any effects can be overcome by appropriate alleviation and mitigation. Surface water drainage and storm water drainage systems should be installed where appropriate.

Highway Access

- 5.9 Safe and convenient vehicular access to a Gypsy and Traveller or Travelling Showpeople site is essential. Access and road safety must adhere to the Highway Authority's guidance. Gypsy and Traveller pitches or Travelling Showpeople plots will not be permitted where site access is deemed unsafe or inadequate. As well as an appropriate access, there must be adequate space provided on sites for the parking and turning of vehicles. Access to local services by foot, cycle or public transport should ideally be available, to reduce the reliance on private vehicles. An area for children to play may be required where access to existing facilities is not available.

Residential Amenity

- 5.10 Consideration should be given to the potential for noise and other disturbance from the movement of vehicles, the stationing of vehicles on the site and any on site business activities. This will be judged on a site by site basis, based on the proposals and the type and proximity of neighbouring development. Hard and soft landscaping should be used to ensure the impact on the character of the area and landscape is minimised, and site boundaries should be clear.
- 5.11 In order to protect the occupants of Gypsy and Traveller and Travelling Showpeople sites, sites will not be permitted in the immediate vicinity of railway lines, water bodies or power lines. Consideration will need to be given to noise and disturbance arising from roads adjacent to or in close proximity to sites. Sites should also be serviceable by electricity, water, drainage and sanitation.
- 5.12 Detail about site design is set out in the DCLG guidance document Designing Gypsy and Traveller Sites Good Practice Guide (2008). Consideration should be given to this document in preparing and assessing planning applications for Gypsy and Traveller and Travelling Showpeople sites. Site design will also have to comply with the conditions of a license issued by the Local Authority under the Caravan Sites Control of Development Act 1960.

Policy GT5: Assessing planning applications for Gypsy and Traveller sites

Sites for Gypsies and Travellers will be granted planning permission providing that:

- Satisfactory evidence is submitted to justify local need for the scale and nature of the accommodation proposed;
- The scale of the site and the number of pitches would not dominate the nearest settled community and would not place undue pressure on local infrastructure;
- The site would not be located in an area at high risk of flooding,

including functional floodplain. A flood risk assessment will be required in areas of flood risk;

- Satisfactory and safe vehicular access to and from the public highway is provided to allow manoeuvrability of living accommodation to the site and the pitch;
- Site design demonstrates that the pitches are of a sufficient size to accommodate trailers/caravans, parking, and storage and amenity space for the needs of the occupants.
- The use of hard and soft landscaping, ensures that any detrimental impact upon the character and appearance of the locality is minimised, including impact on biodiversity and nature conservation;
- Sensitive boundary treatment, which may include hedges, walls and fences, is erected to provide clear demarcation of the perimeter of the site;
- The amenity of nearby occupiers will not be unduly harmed by the development;
- Pollution from light and noise sources on the site are minimised and visual and acoustic privacy is maintained for both site residents and the occupiers of nearby land and property;
- Adequate schools, shops, healthcare and other community facilities are within reasonable travelling distance; and
- Suitable arrangements can be made for drainage, sanitation and access to utilities.

Planning permission for Gypsy and Traveller sites in the Green Belt will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt.

5.13 Travelling Showpeople’s needs are distinct to the needs of the wider Gypsy and Traveller community:

- They do not share the same cultures or traditions as Gypsies and Travellers.
- Travelling Showpeople sites combine residential, storage and maintenance uses, and require secure permanent bases for the storage of their equipment.

Applications for Travelling Showpeople sites will be assessed against the criteria in Policy GT5, and the specific criteria in Policy GT6 below.

Policy GT6: Assessing planning applications for Travelling Showpeople sites

Sites for Travelling Showpeople will be granted planning permission provided that:

- The criteria in Policy GT5 are satisfactorily met;
- Sufficient space is provided to accommodate the storage and maintenance of equipment; and

- Satisfactory and safe vehicular access to and from the public highway is provided both to allow manoeuvrability of living accommodation and equipment to the site and plot, and to ensure the safety of other road users with the use of traffic calming measures where appropriate.

Planning permission for Travelling Showpeople sites in the Green Belt will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt.

The expansion of Gypsy and Traveller and Travelling Showpeople sites

- 5.14 Existing, permanent Gypsy and Traveller and Travelling Showpeople sites may be expanded to accommodate an additional, identified need for pitches/plots. This need is likely to arise from the expansion of families residing on the site. The density of Gypsy and Traveller and Travelling Showpeople sites varies depending on the scale, location and number of occupants. On some sites there may be opportunities to subdivide or infill existing pitches/plots in order to provide additional accommodation.
- 5.15 The following sequential approach should be adopted when assessing the expansion of a site:
1. Subdivision or infilling of existing pitches/plots will be preferential where there is sufficient space to do so and this would not be detrimental to the amenity of site occupants and neighbouring residents. New pitches would still need to meet the relevant licensing requirements.
 2. Expansion of sites directly adjacent to the current boundary, providing sufficient land to meet the identified need.
- 5.16 All planning applications for the expansion of existing sites will be considered against policies GT5, GT6, GT7, GT8 and other relevant policies in the Development Strategy for Central Bedfordshire.

Policy GT7: Assessing Planning Applications for the Expansion of Existing Gypsy and Traveller and Travelling Showpeople Sites

The expansion of existing sites for Gypsies and Travellers and Travelling Showpeople will be permitted provided that satisfactory evidence demonstrates the need for the scale and nature of accommodation proposed.

In order to safeguard the countryside, the expansion of sites should

be achieved through the subdivision or infilling of existing pitches or plots.

Where a site cannot be subdivided, expansion will be considered provided that the area of expansion is directly adjoining the existing site and has no adverse impact on the area.

Provision of space/facilities for business use on permanent sites

- 5.17 The Gypsy and Traveller community tends to be self employed, sometimes running their businesses from the site on which their caravans are stationed. Gypsy and Traveller sites suitable for mixed residential and business uses should have regard to the safety and amenity of the occupants and neighbouring residents. Sites in the rural area will need to pay particular attention to minimising the impact of any business use on the countryside.
- 5.18 The Council will consider applications for business use for the Gypsy and Traveller community provided they meet criteria set out in the policy below.

Policy GT8: Provision of Space/Facilities for Business Use on Permanent Gypsy and Traveller Sites

Planning applications for business use on or directly adjoining Gypsy and Traveller sites for the Gypsy and Traveller community will be granted provided that:

- The business use proposed is proportionate to the site and would not have an unacceptable detrimental impact on the visual appearance of the surrounding area;
- The amenity and safety of the occupants of the site and/or neighbouring residents should not be harmed;
- A safe, convenient and adequate standard of access can be provided;
- There are suitable areas for parking vehicles or storage of materials; and
- Appropriate safeguards are put in place to prevent the pollution of ground and surface water.
- The use should relate to at least one of the households on the site

6. Safeguarding sites

- 6.1 To ensure the levels of Gypsy and Traveller and Travelling Showpeople accommodation are maintained and that a range of sites exist, current authorised sites with permanent planning permission will be safeguarded. This will also apply to the sites allocated in this Gypsy and Traveller Local Plan and any windfall sites that receive permanent permission in the future.
- 6.2 Safeguarding will ensure that development or redevelopment of land for uses other than Gypsy and Traveller and Travelling Showpeople accommodation would not be permitted. A permanent protected site will give certainty to the Gypsy and Traveller community and settled community.

Policy GT9: Safeguarded sites

The Council will safeguard existing authorised Gypsy and Traveller sites, new allocated sites and windfall sites with permanent permission where there is an existing, demonstrable need for accommodation.

7. Gypsy and Traveller site allocations

Land west of Barton Le Clay

- 7.1 The site is situated to the west of Barton Le Clay and the A6, and to the south of Faldo Road. Barton Le Clay offers a good level of services and facilities including a lower and middle school, a doctor's surgery and shops. This is recognised in the Development Strategy, which defines the settlement as a Minor Service Centre. The site could accommodate up to 10 pitches.
- 7.2 The site is adjacent to the A6 and to the east of Barton Industrial Estate. There may be issues relating to noise, light and odour that will require mitigation and a full assessment will be required in advance of a planning application being submitted.
- 7.3 The site is located within the setting of the Moated Site at Faldo Farm, Scheduled Ancient Monument and an appropriate buffer will be required to ensure the historical site is protected. The archaeological potential of the site will need to be investigated prior to the submission of a planning application.
- 7.4 There could be long ranging views of the site from the Chilterns AONB. Appropriate landscaping will be required to minimise the impact of the site on the wider landscape.
- 7.5 The site is located within the existing Green Belt. The defined Green Belt boundary will be amended in order to accommodate and enhance the deliverability of the site. The Council consider removing this site from the Green Belt would have limited harm on the openness of the countryside as the site is adjacent to the Faldo Road Industrial Estate, the A6 trunk road and the existing settlement of Barton-Le-Clay.

Policy GT10: Land west of Barton Le Clay

Land west of Barton Le Clay is allocated for 10 pitches. The development will need to provide the following:

- A full noise and odour assessment being undertaken prior to a planning application being submitted.
- Provision of appropriate buffer landscaping to minimise the impact of development on the landscape.
- Appropriate mitigation against the impact on the Moated Site at Faldo Farm, Scheduled Ancient Monument.
- An archaeological field investigation being undertaken prior to an application being submitted.

Land south of Dunton Lane, Biggleswade

- 7.6 The site is located midway between Biggleswade and Dunton and is currently used for agriculture. Biggleswade is within a reasonable travelling distance and offers a high level of facilities and services. This is recognised in the Development Strategy, which defines the settlement as a Major Service Centre. The site is considered to be adequately accessible from Dunton Lane and could accommodate up to 10 pitches.
- 7.7 The site is located in the open countryside and careful screening will be required to minimise the impact of the site on the wider landscape.
- 7.8 The site is located within the wider setting of the Stratton Moat Scheduled Ancient Monument and an appropriate buffer will be required to ensure the historical site is protected. The archaeological potential of the site will be investigated prior to the submission of a planning application.

GT11: Land south of Dunton Lane, Biggleswade

Land south of Dunton Lane, Biggleswade is allocated for 10 pitches. The development will need to provide the following:

- Provision of appropriate buffer landscaping to minimise the impact of development on the landscape.
- Appropriate mitigation against the impact on the Stratton Moat Scheduled Ancient Monument.
- An archaeological field investigation being undertaken prior to an application being submitted.

Land east of Potton Road, Potton

- 7.9 The site is located to the northwest of Potton and to the north of an existing minerals site. Potton is within a reasonable travelling distance and offers a good level of services and facilities. This is recognised in the Development Strategy, which defines the settlement as a Minor Service Centre. The site could accommodate up to 10 pitches.
- 7.10 There may be issues relating to noise and dust arising from the neighbouring minerals site that will require mitigation. An assessment will be required in advance of a planning application being submitted. A buffer zone of an appropriate scale will be identified in order to protect the amenity of the site occupants.
- 7.11 The site is located within a Biodiversity Opportunity Area and accordingly a net gain for biodiversity will be sought as part of the development. The site is close to Gamlingay Heath County Wildlife Site and adequate buffering should be sought to ensure there is no adverse impact. The site forms part of the Greensand Ridge landscape character area and appropriate measures will be required to minimise the impact of the site on the landscape.

GT12: Land east of Potton Road, Potton

- Land east of Potton Road, Potton is allocated for 10 pitches. The development will need to provide the following:
- A full noise and odour assessment being undertaken prior to a planning application being submitted.
 - Provision of an adequate buffer to safeguard the Gamlingay Heath Plantation County Wildlife Site.
 - Provision of appropriate landscaping to minimise the impact of development on the landscape.

Land east of Watling Street and south of Dunstable

- 7.12 The site is situated within the Green Belt, to the south of Dunstable and to the east of the A5. There is an existing site with permission for 6 permanent Gypsy and Traveller pitches. The allocation is an extension to the existing site, directly adjacent to the northern boundary, and could accommodate up to 9 additional pitches. This site is privately owned and occupied and will be privately managed by the current owner.
- 7.13 The site is in a rural location but is within a reasonable distance of Dunstable, one of the largest settlements in Central Bedfordshire, which offers a significant level of services. The site is directly adjacent to the A5 and can be satisfactorily accessed. The existing roadside verge, ditch and hedgerow should be retained and reinforced to improve privacy and mitigate against traffic noise.
- 7.14 The site is located within the Chilterns AONB and careful landscaping will be necessary. A landscape buffer will be required along the northern and eastern boundary to screen the site, define the boundary and provide separation from the pylons located to the east.

GT13: Land east of Watling Street and south of Dunstable

Land east of Watling Street and south of Dunstable is allocated for 9 pitches. The site will not be removed from the Green Belt. The development will need to provide the following:

- Retention of the existing roadside verge, ditch and hedgerow, and a reinforcement of the hedgerow to improve privacy and reduce traffic noise.
- Provision of a landscape buffer to the northern and eastern boundaries.

1 Old Acres, Barton Road, Pulloxhill

- 7.15 The site is situated off the A6, south of Pulloxhill and has been occupied since July 2004 by a single Gypsy and Traveller family occupying 8 caravans. The temporary planning permission has now lapsed. The site is allocated for up to 13 pitches comprising 8 pitches accommodating the current site occupants and an additional 5 pitches. This site is privately owned and occupied and will be privately managed by the current owner.
- 7.16 This site is in a rural location, but is within a reasonable distance to Barton le Clay, which offers a good level of services including a lower and middle school, doctor's surgery and shops. This is recognised in the Development Strategy, which defines the settlement as a Minor Service Centre.
- 7.17 Access to the site is acceptable and has the capacity to cater for the proposed number of pitches. Additional landscaping and boundary treatments will be required in extended the site, in accordance with policies GT5 and GT7.

Policy GT14: 1 Old Acres, Barton Road, Pulloxhill

1 Old Acres, Barton Road, Pulloxhill is allocated for 13 pitches.

Land south of Fairfield, West of Stotfold Road, Stotfold

- 7.18 The site is situated to the south of Fairfield, Stotfold, between Lower Wilbury Farm and Stotfold Road. Fairfield has a small number of local services including a food shop and a lower school and is recognised as a Large Village in the Development Strategy. The site is also within a reasonable distance to Stotfold, a Minor Service Centre with a larger number of services and facilities, and also to Letchworth and Hitchin in the south. The site could accommodate up to 10 pitches.
- 7.19 Access to the site is considered to be acceptable and screening and planting will ensure that it is integrated within the landscape. The site could contain some contamination and a full contaminated land survey would be required in advance of a planning application.

Policy GT15: Land south of Fairfield

Land south of Fairfield is allocated for 10 pitches. The development will need to provide the following:

- A full contaminated land survey being undertaken prior to a planning application being submitted.

Land east of the M1, Tingrith

- 7.20 This site is located within the Green Belt to the east of the M1 in Tingrith and is occupied by a single Gypsy and Traveller family with temporary planning permission for 4 caravans. The site is allocated for up to 4 pitches, to accommodate the current family. This site is privately owned and occupied and will be privately managed by the current owner.
- 7.21 The site is in close proximity to the M1 motorway and this may present noise issues. However, the site is in residential use and the occupants will not be permanently resident on site. Additional screening along the boundary should be used to mitigate against any noise and landscape impact.

Policy GT16: Land east of the M1, Tingrith

Land east of the M1, Tingrith is allocated for 4 pitches. The site will not be removed from the Green Belt. The development will need to provide the following:

- Provision of additional screening along the site boundary to minimise the impact of noise on the occupants and to mitigate against the impact on the landscape.

8. Travelling Showpeople site allocations

Kennel Farm Holding, off Dunton Lane, Biggleswade

- 8.1 This site is located on the edge of Biggleswade, adjacent to some small industrial units at Stratton Park and the Manor Court mobile home site. Biggleswade offers a high level of facilities and services and is defined as a Major Service Centre in the Development Strategy. The centre of Biggleswade and nearby facilities at Saxon Gate will be accessible on foot or by cycling. The site will accommodate 4 plots to meet the local need identified in Biggleswade.
- 8.2 Vehicles associated with the Travelling Showpeople community are often long and can comprise a number of vehicles connected as one unit. Access requirements are unique and will require detailed analysis. The most appropriate point of access is considered to be to the north west of the site, using an existing roundabout on Saxon Drive and where the public highway is subject to a 40mph speed limit.
- 8.3 The site is located adjacent to an adopted watercourse and a flood risk assessment will be required to assess the likely impact of development and identify alleviation and mitigation measures.
- 8.4 The site is located adjacent to the Stratton Moat Scheduled Ancient Monument and an appropriate buffer will be required to ensure the historical site is protected. The archaeological potential of the site will be investigated prior to the submission of a planning application.

GT17: Kennel Farm Holding, Biggleswade

Kennel Farm Holding, Biggleswade is allocated for 4 plots for the Travelling Showpeople community. Limited and small scale commercial activity and maintenance will be permitted on this site provided this is connected to the Travelling Showpeople business only. The development will need to provide the following:

- Appropriate mitigation against the impact on the Stratton Moat Scheduled Ancient Monument.
- An archaeological field investigation being undertaken prior to an application being submitted.

9. Monitoring

- 9.1 Regular monitoring and review is necessary to assess the effectiveness of planning policies and proposals. There is a requirement for all Local Planning Authorities to publish an Annual Monitoring Report (AMR) providing an assessment of its policies and progress towards achieving planning objectives and targets. The monitoring and evaluation process will form part of the feedback mechanism to ensure the effective operation of policies or highlight any revisions that may be required.
- 9.2 The Council will review the Gypsy, Traveller and Travelling Show person Accommodation Assessment periodically to ensure there is a locally derived, robust evidence base to establish accommodation needs to inform the preparation of future local plans and make planning decisions.
- 9.3 The PPTS requires local planning authorities to:
- Identify and update annually a five year supply of specific deliverable sites; and
 - Identify a supply of developable sites or broad locations to accommodate growth for years 6-10 and where possible 11-15.
- 9.4 The Council will monitor annually the delivery of Gypsy and Traveller pitches and Travelling Showpeople plots to ensure there is a supply of sites. Twice yearly counts are conducted to ascertain the number of caravans on each Gypsy and Traveller and Travelling Showpeople site in Central Bedfordshire and to identify the level of hidden need (Gypsy and Travellers living in bricks and mortar housing). The following indicators will be used to monitor and review policies and proposals, and will be reported in the AMR:
- Net additional permanent Gypsy and Traveller and Travelling Showpeople pitches
 - The levels of vacancy on permanent Gypsy and Traveller sites
 - The levels of vacancy on permanent Travelling Showpeople sites
 - The number of illegal encampments and enforcement action carried out
 - The number of applications by Gypsies and Travellers and Travelling Showpeople approved and refused.

Appendix 1: Glossary

Site: A Gypsy and Traveller Site is the area where Gypsies and Travellers live. One site may have a number of pitches and be home to a number of families.

Pitch: A pitch is the space required to accommodate one household and their caravans, parking space and enough room for the turning of vehicles. There is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, as a general guide it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and a touring caravan (or two caravans) drying space for clothes/ a small garden, a lockable shed and parking space for two vehicles.

Permanent Pitch: A pitch with planning permission where the residents have the right to remain on the site permanently

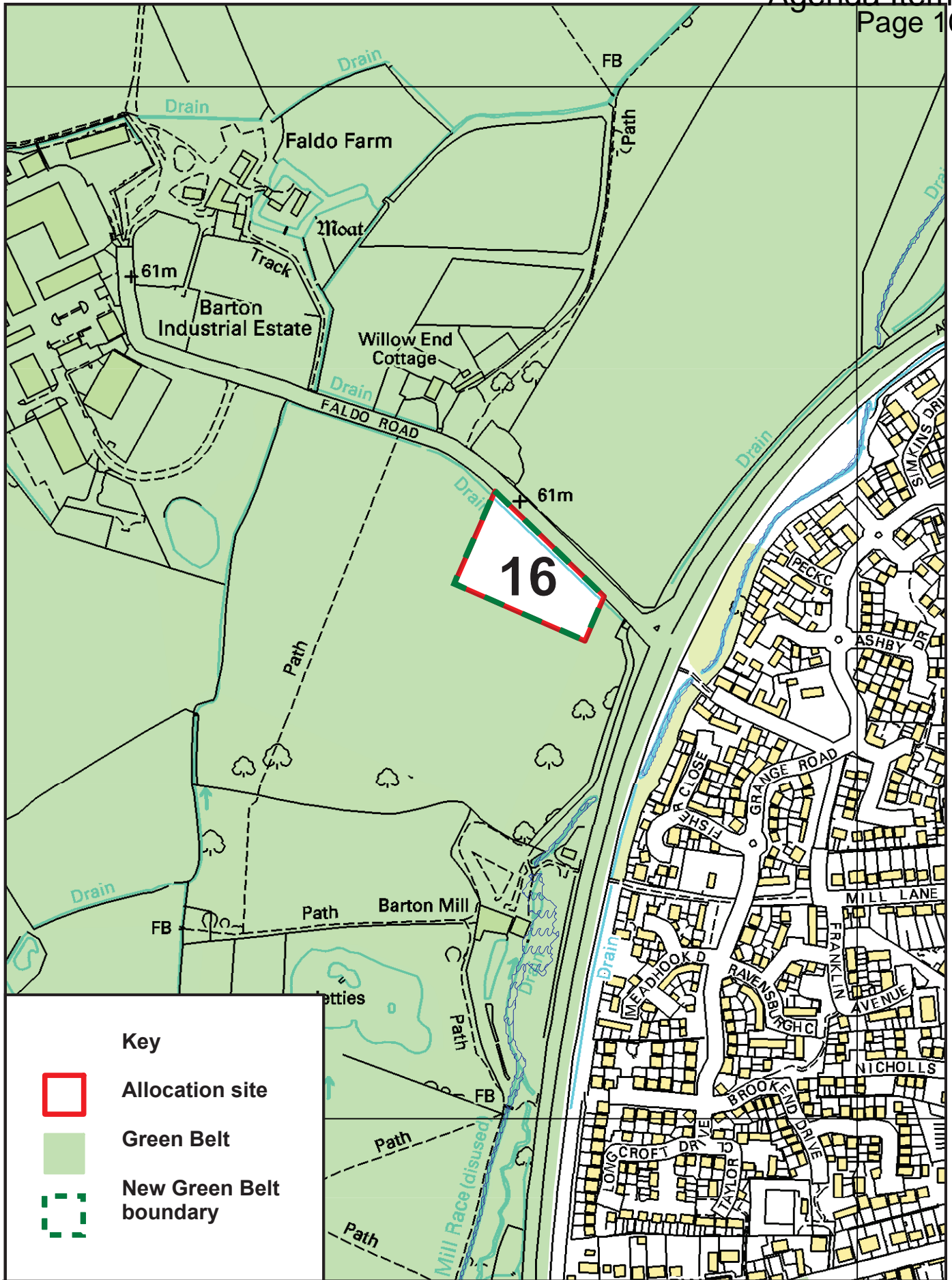
Transit Pitch: A transit pitch is intended for short term use by Gypsies and Travellers on the move. The pitch is itself permanent, while its residents are temporary, with a maximum period of stay imposed, usually by the site manager.

Visitor Space: Space on site that enables the Gypsy and Traveller community to accommodate members of their family who are visiting. A visitor space would be offered on a short term basis to visiting friends and families of the Gypsies and Travellers residing on the site. These pitches would be in addition to the permanent pitches on site.

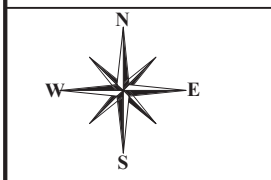
Plot: A plot is a pitch on a Travelling Showpeople site (often called a 'yard'). This terminology differentiates between residential pitches for Gypsies and Travellers and mixed-use plots for Travelling Showpeople, which will need to incorporate space or be split to allow for the storage of equipment such as fairground rides.

Windfall sites: These are sites that have not been identified for development in a Local Plan, but which subsequently become available for development. Any windfall planning permissions granted for Gypsy and Traveller pitches and Travelling Showpeople plots will contribute to meeting the overall need in Central Bedfordshire.

Appendix 2: Allocation Maps




Site 16 - South of Faldo Road, Barton

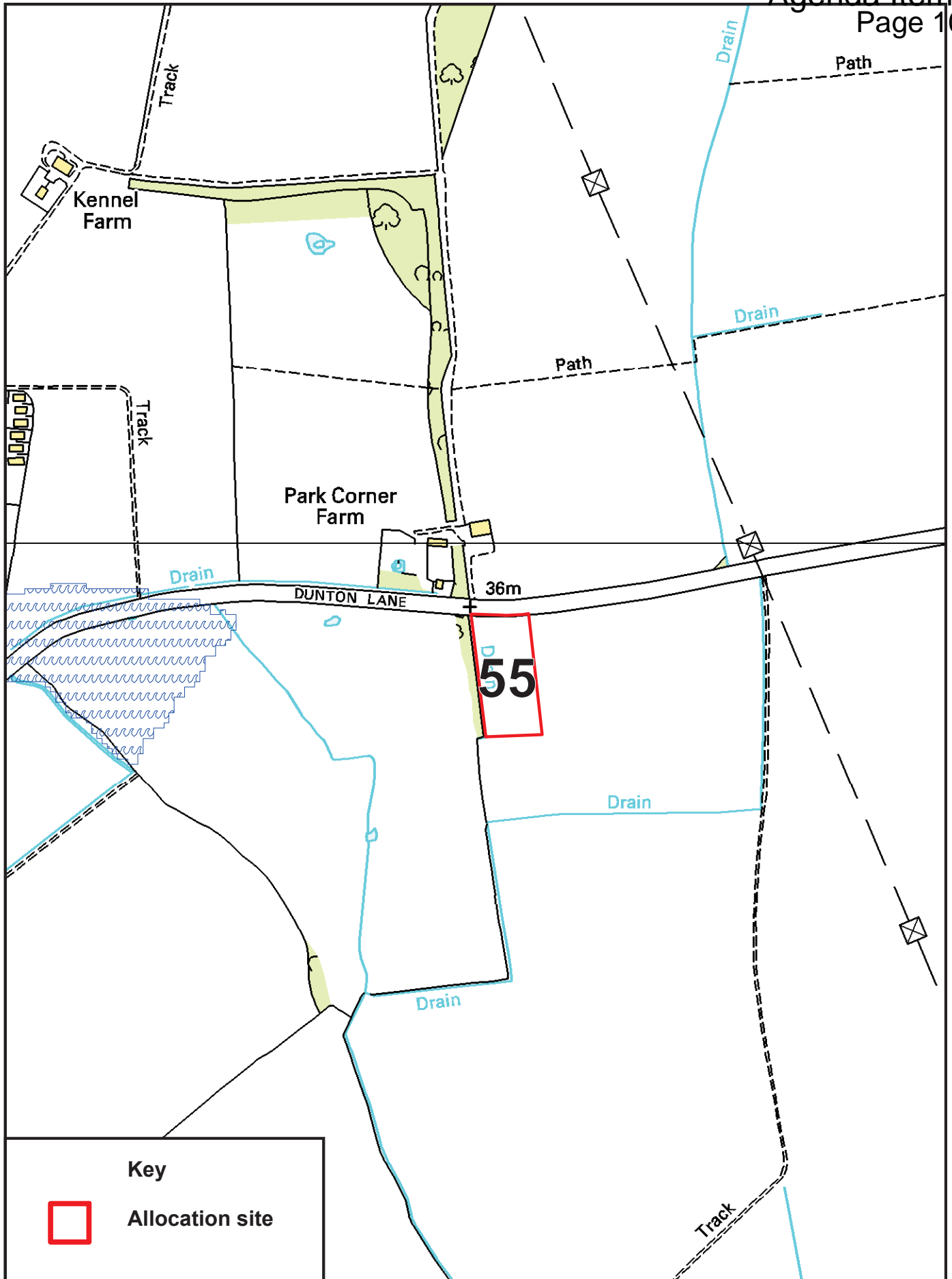


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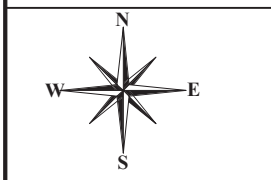
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Site 55 - South East of Park Corner Farm, Biggleswade

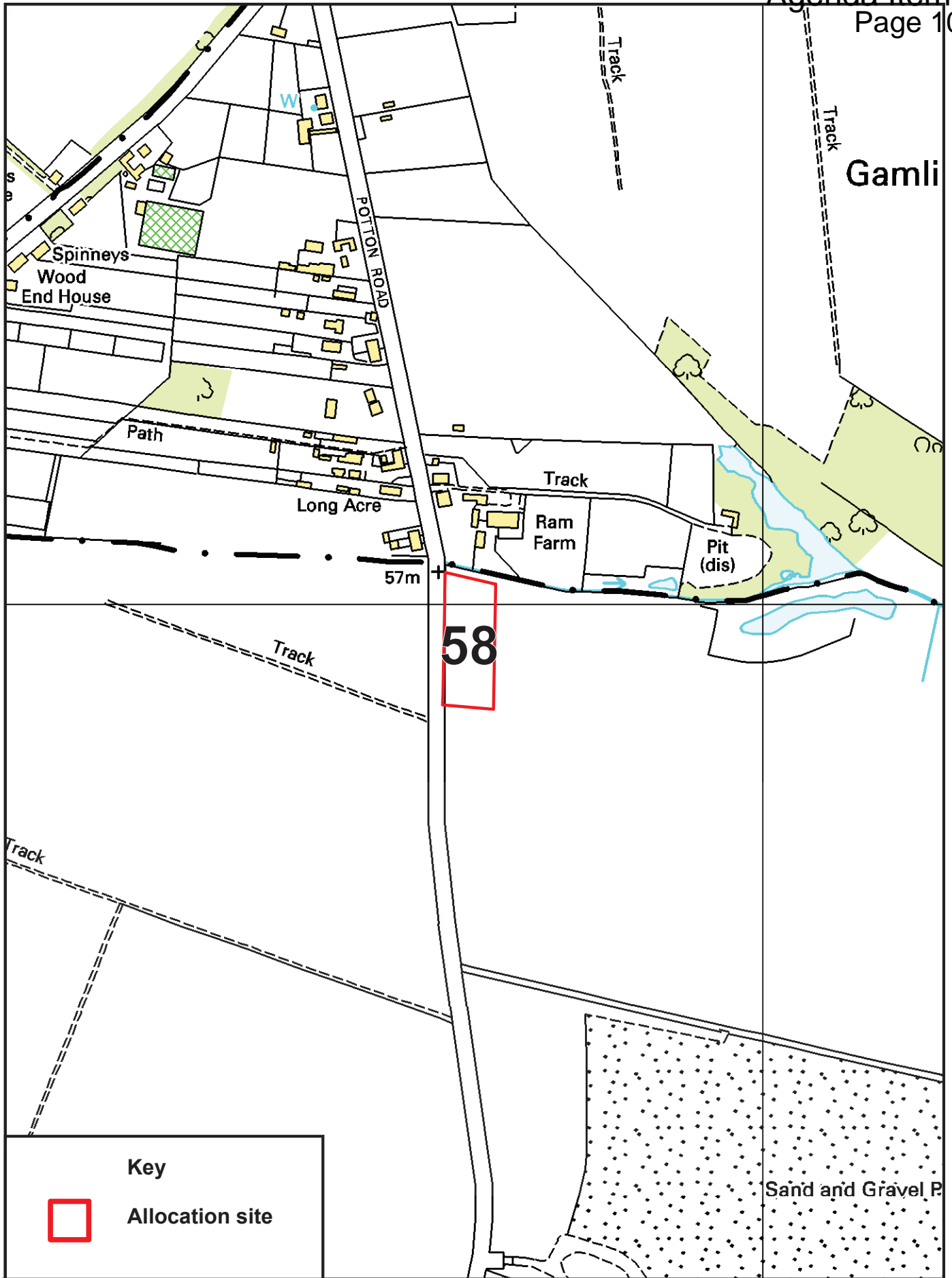


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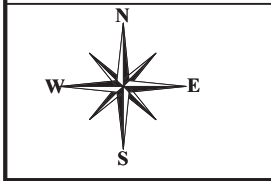




Key

 **Allocation site**


Site 58 - East of Potton Road, Potton

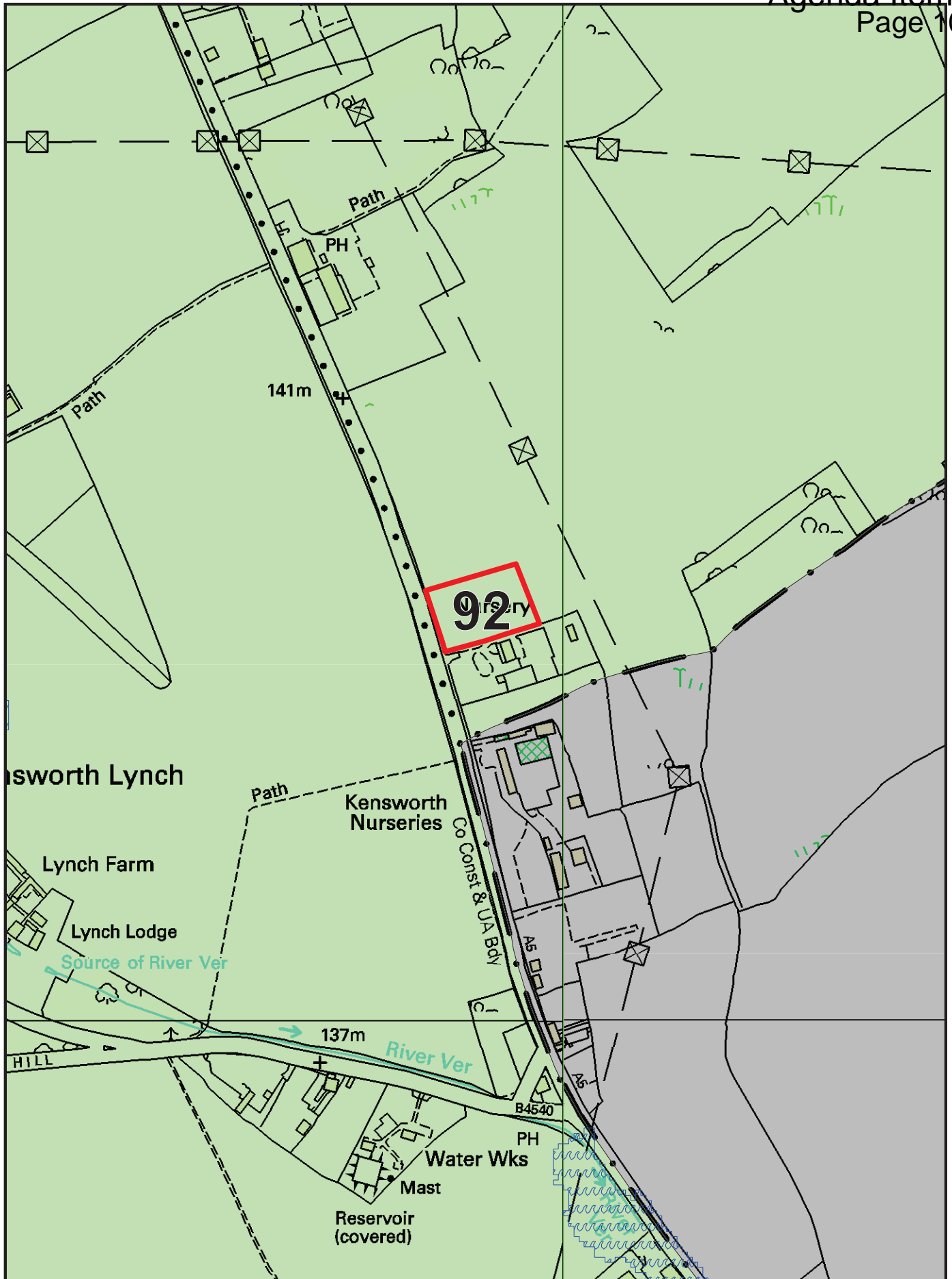


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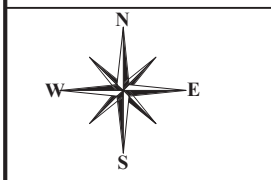
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Site 92 - East of A5, Caddington

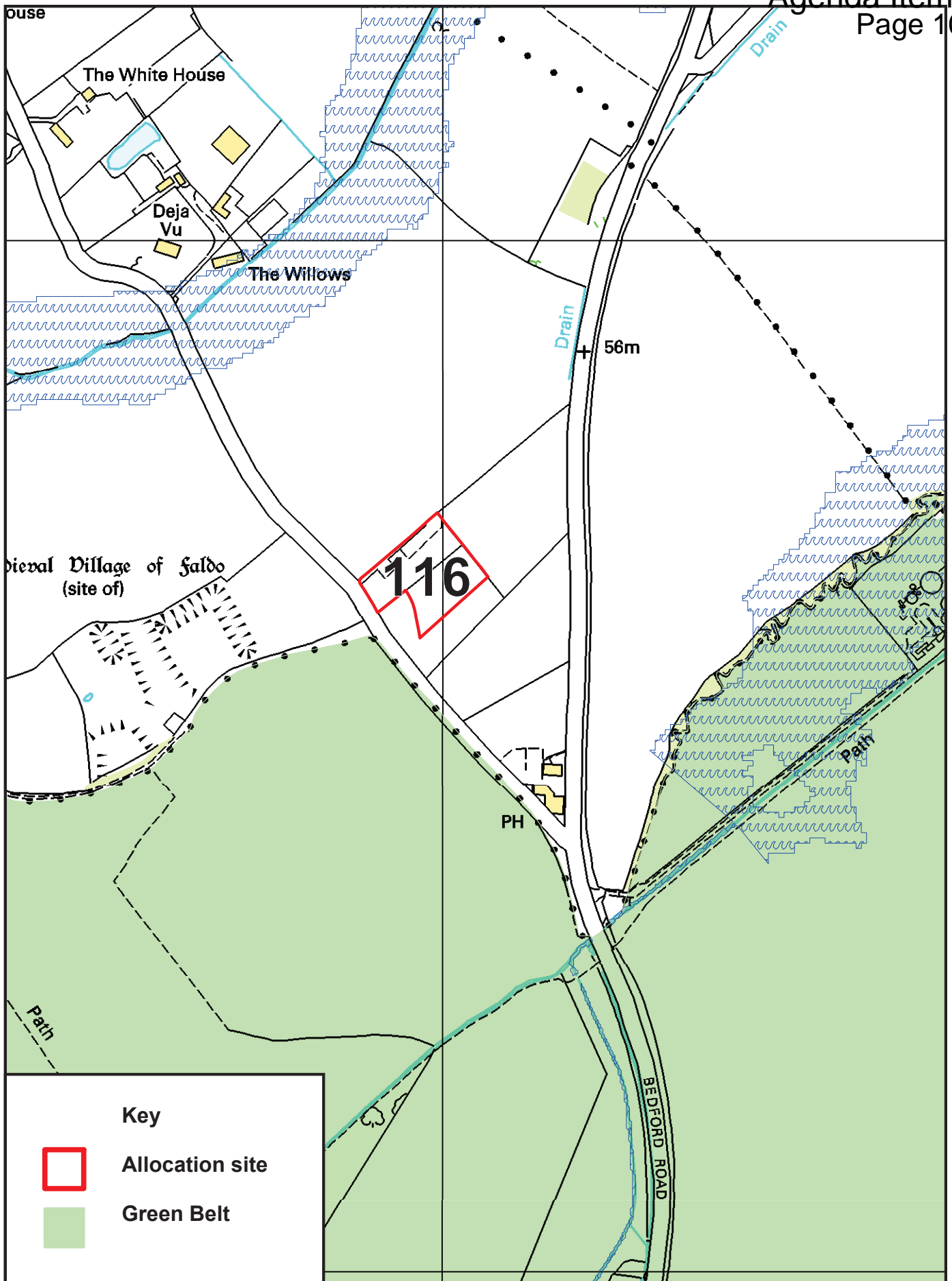


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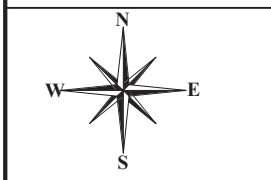
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Site 116 - Old Acres, Silsoe

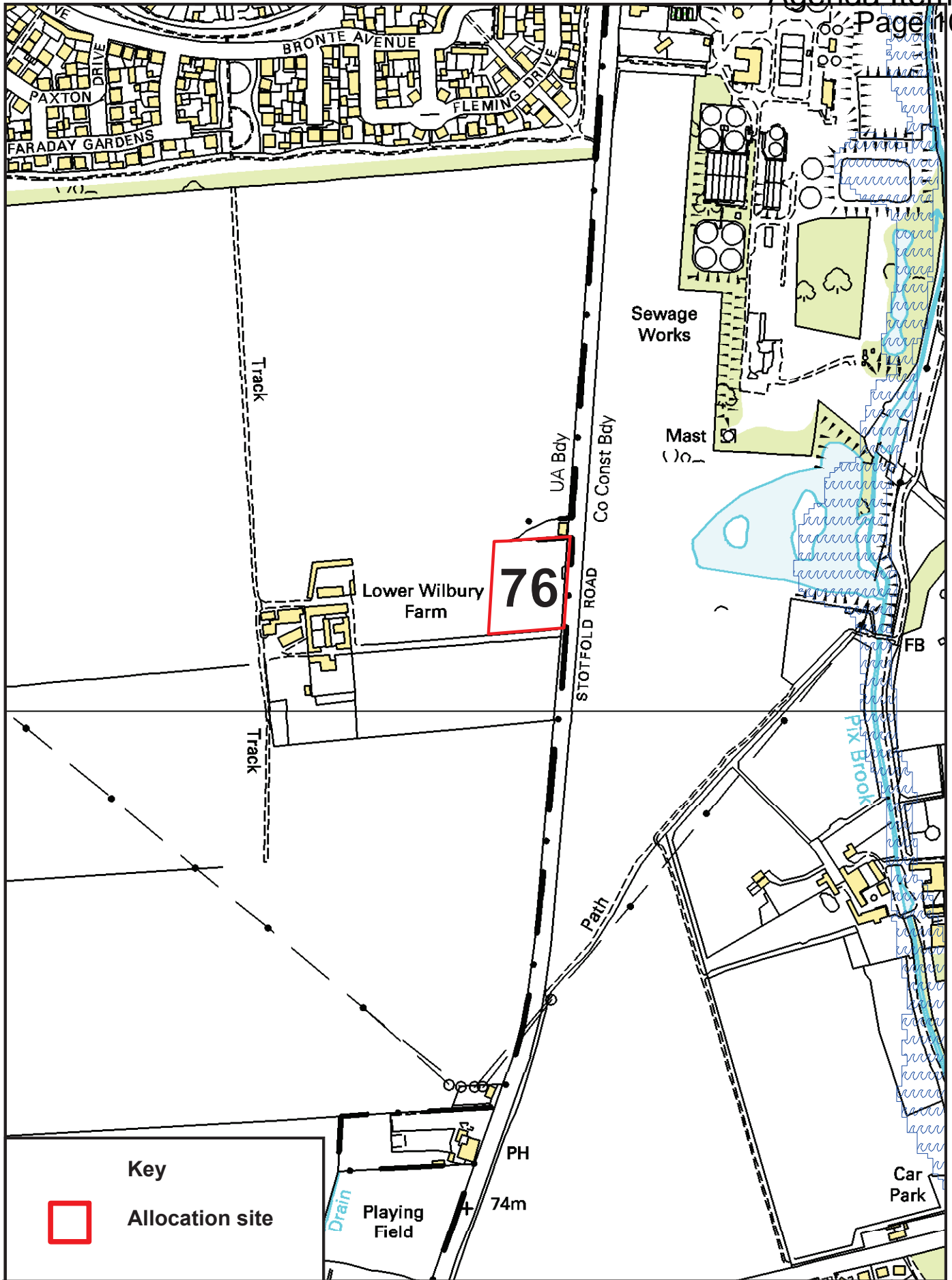


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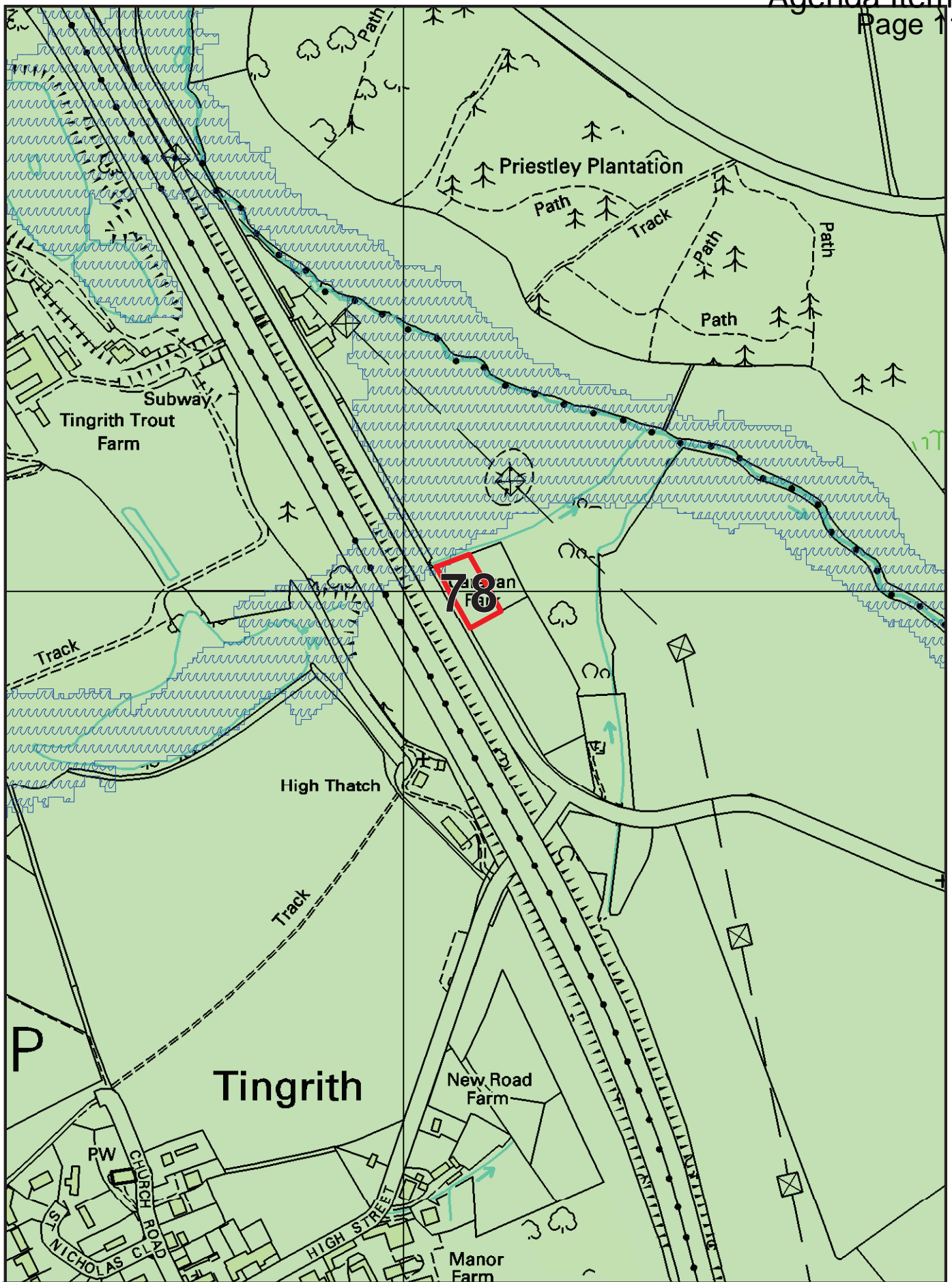
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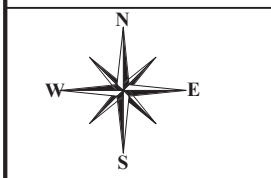


Site 76 - West of Stotfold Road, Stotfold

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Site 78 - Chestnuts Caravan Park, East of M1, Tingrith

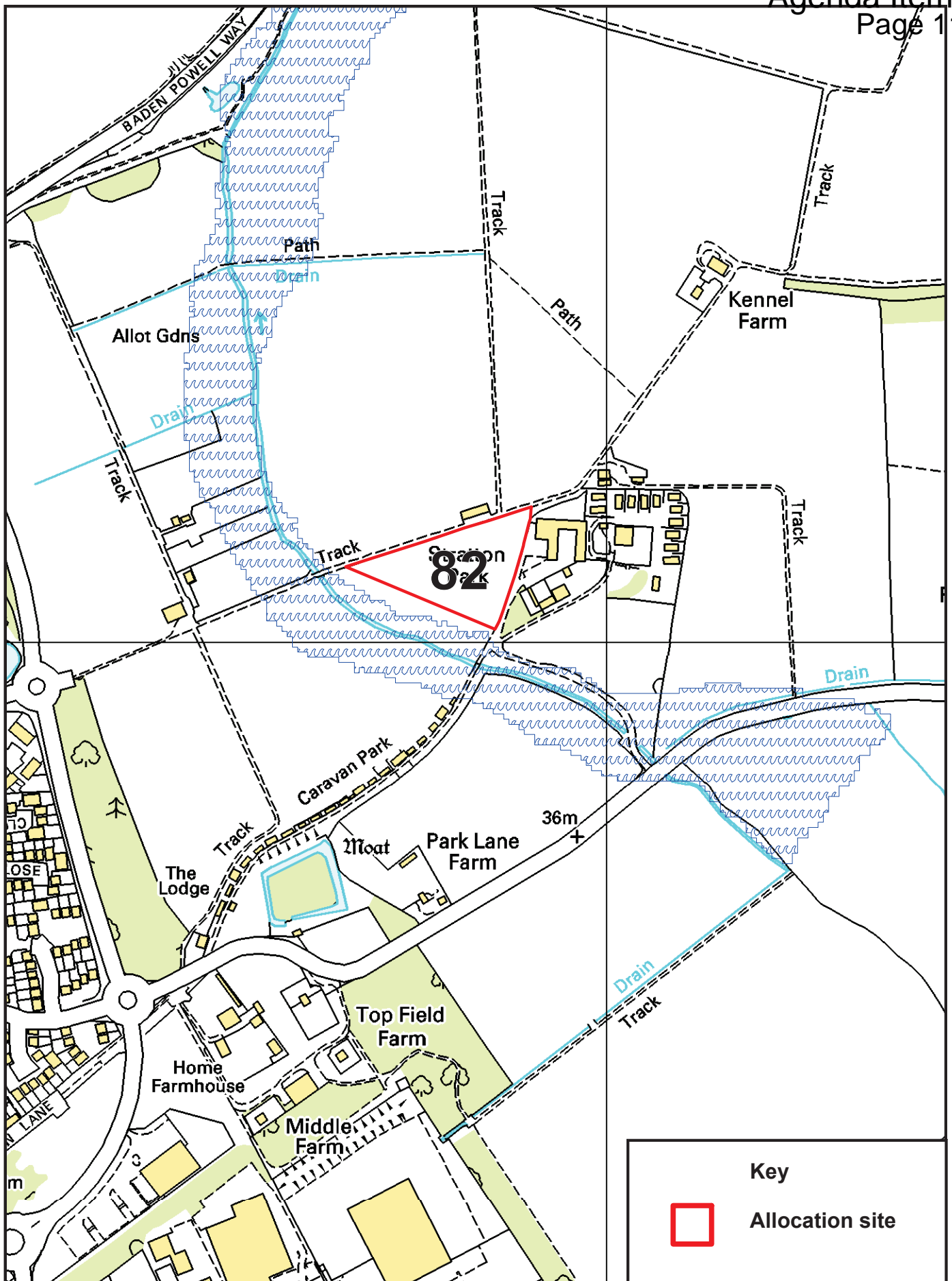


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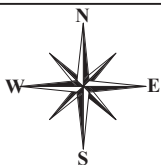
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Site 82 - Kennel Farm, Dunton Lane, Biggleswade



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Central Bedfordshire

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Part 1

Section 1: Introduction

	Issue	Response	Change Required
1.	<p>Central Bedfordshire Council has failed to identify the justification for producing a separate Gypsy & Traveller Local Plan. This justification should be clearly detailed within the Gypsy & Traveller Local Plan and subject to the public consultation process. The local plan should be withdrawn and incorporated within Central Bedfordshire emerging development strategy.</p>	<p>The Executive Committee on 4 October 2011 noted that “aside from the Development Strategy there is a need to address other more detailed aspects of planning policy. Provision for the Gypsy and Traveller and Travelling Showpeople communities is also an issue that might usefully be separated out from other aspects of the programme. Local authorities are required to assess the accommodation needs of Gypsies and Travellers alongside the settled population and to develop a strategy that addresses any identified unmet need.</p> <p>Recent Government guidance re-emphasises the importance of delivering Gypsy and Traveller pitches in line with local need and has sought to mainstream provision alongside other community requirements. The Development Strategy document will therefore need to set the context for future Gypsy and Traveller and Travelling Showpeople provision. However, the consideration of detailed sites is something that can more appropriately be dealt with through a planning document dedicated to this issue.</p> <p>Significant work on the identification of Gypsy and Traveller sites has already been undertaken in the north of Central Bedfordshire and rather than discard these advances in the provision of sites it is proposed that this work is banked and helps to</p>	None

		<p>underpin the new document for the whole of Central Bedfordshire Council. To further provide assurance in the north of Central Bedfordshire it may be appropriate to endorse the work undertaken to date on the preparation of the Development Plan Document for development management purposes until such time as the new district wide document is in place. Members are therefore asked to support the preparation of a Central Bedfordshire-wide Gypsy and Traveller plan to deliver the combined pitch requirement for the northern and southern parts of Central Bedfordshire to 2031.”</p>	
2.	<p>The Plan is unsound due to inadequate consultation with stakeholders, specifically residents. The Plan fails the test of CBC’s Community Engagement Strategy. The site selection process should be re-run from the beginning.</p>	<p>As documented in the Consultation Statement all regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 regarding public consultation were followed during the plan making process.</p>	<p>Officers acknowledge that the online consultation mechanism can be difficult to use. Therefore the Council is currently investigating ways to improve the electronic consultation mechanism. The Council wants to enable everyone to have their say and therefore, continues to accept written representations and email representations for those who do not wish to, or are unable to utilise the online consultation mechanism</p>
3.	<p>Paragraph 1.13 - Insertion of a caveat regarding the applicability of the Habitats Directive and related legislation / regulation and at what stage (re)assessment would occur.</p>	<p>There are no Natura 2000 or Ramsar sites in Central Bedfordshire. The Sustainability Appraisal concluded that the Gypsy and Traveller Local Plan would have no adverse effects on these sites, either alone or in combination with other plans. The Sustainability Appraisal considered the impact of all sites at Stage</p>	<p>None</p>

		<p>3 of the site assessment. Reassessment against the Habitats Directive would only occur should any changes to the Plan result in the inclusion of sites that have not been previously considered</p>	
4.	<p>Paragraph 1.15 - How did the Council arrived at the Stage 1 list of 122 sites (mainly from its own landholding portfolio of in excess of 200s sites)</p>	<p>The over-arching principle for sites to be considered, is that they must be 'deliverable'. That means that there are no fundamental obstacles to the site being developed. There would be no purpose in putting a site forward to be considered against the criteria if it could not, reasonably, be developed.</p> <p>A list of all of the Council's landholding was considered and those that were available were investigated further. Existing public facilities such as care centres, libraries, country parks and registry offices were discounted.</p> <p>The remaining land was mostly countryside or open land used as farm land. Detailed research was then carried out to establish the up to date legal status and any existing plans for the available land. The tenancy and other legal agreements were considered and the land did not go forward if there were contractual obstacles to development.</p> <p>Having dismissed the obviously unavailable and undeliverable sites, the remaining sites were at least worth considering against the selection criteria, alongside the private sites.</p>	None

Section 2: Vision and Objectives

	Issue	Response	Change Required
1.	Add reference to the need to protect the historic environment to the Visions and Objectives	This is not relevant in this section. However reference to the need to protect the historic environment will be added to Paragraph 5.2 and Policy GT5.	Add "Consideration of the need to protect the historic environment" to the list of bullets at Paragraph 5.2 and Policy GT5
2.	Objective to deliver 157 pitches to adequately meet the needs of the Gypsy and Traveller community is flawed as the GTAA underestimates need	The new GTAA 2014 addresses these concerns.	None (See GTAA 2014)

Section 3: Gypsy and Traveller Accommodation Need

	Issue	Response	Change Required
1.	The 2.5% compound growth rate in the GTAA is not substantiated likely overestimates/ underestimates need	The rationale for the use of the 2.5% compound growth rate is explained in detail in the Technical Paper provided by ORS entitled Household Formation Rates for Gypsies and Travellers.	None (See ORS Technical Note)
2.	The GTAA did not consult residents of Gypsy sites	The 2013 GTAA was a statistical update with little fieldwork. The 2014 GTAA sought to undertake a full Gypsy and Traveller census for Central Bedfordshire.	None (See GTAA 2014)
3.	Paragraph 3.2 - include maximum and minimum pitch size (for permanent, visitor and transit pitches). Site size is intrinsic to the application of environmental impacts assessments and will need to be considered well ahead of any planning process.	It is not appropriate to ascribe maximum and minimum pitch sizes, just as with houses for the settled community, pitches can be different sizes to meet the specific needs of the residents. For the purposes of the Plan Officers have used a general pitch size of approximately 500 square meters. Additional space is then provided for circulation.	None

4.	Paragraph 3.3 - how is a preference for "family owned sites" reflected in the Council's Community Asset Transfer strategy	This is not an issue for the Plan	None
5.	Paragraph 3.3 - it would be useful to compare local Gypsy and Traveller preferences and observations against national surveys	Whilst the GTAA 2014 considers national trends and data in addition to local information, the PPTS emphasises the requirement to provide locally derived data.	None (See GTAA 2014)
6.	Paragraph 3.5 - include details of waiting lists and current illegal sites as an assessment of current need (rather than demand)	The GTAA 2014 considers the waiting lists and unauthorised encampments when determining pitch requirements.	None (See GTAA 2014)
7.	Paragraphs 3.8 and 4.7 should be amended to say that planning application will be determined in accordance with the development plan, unless material considerations indicate otherwise. It should be explained that the other material considerations include national planning guidance.	As noted in Paragraph 1.6 The Gypsy and Traveller Local Plan sits alongside the Development Strategy. Paragraph 1.7 states "Policies contained within the Development Strategy will also apply when considering planning applications for Gypsy and Traveller and Travelling Showpeople development.	None
8.	Sites identified through the Local Plan process should be developed first	Sites will be delivered in accordance with the Gypsy and Traveller Pitch and Travelling Showpeople Plot Trajectory.	None
9.	Development within the Green Belt cannot be considered acceptable when a designated site is available. Include a hierarchy of appropriate sites suitable as windfall. This should include firstly sites within existing urban areas, brownfield sites, sites within urban extension areas followed by the intensification, where appropriate, of existing sites through either infill or small extensions where this does not affect the amenity of the adjoining settled community.	As with the settled community each planning application is considered on its own merit.	None

10.	Information should be provided about the expected windfall supply to give confidence that it should form part of the deliverable/ developable supply.	Officers agree that further detail needs to be provided in relation to anticipated windfall provision. Officers are currently preparing a paper that outlines anticipated windfall levels based on historic trends and anticipated applications.	None
11.	The GTAA is flawed because: - GTAA inaccurately assumes within the findings that long-term unauthorized sites will gain Certificates of Lawful Development - GTAA does not consider private sites when assessing overcrowding - GTAA provides unsupported assumptions for families in brick and mortar - GTTA does not take account of families on tolerated and temporary pitches	These issues have all been addressed in the GTAA 2014	None (See GTAA 2014)
12.	The Plan should give more information on the scale of transit need which needs to be met and how such provision will be delivered.	These issues have all been addressed in the GTAA 2014	None (See GTAA 2014)

Section 4: Travelling Showpeople Accommodation Need

	Issue	Response	Change Required
1.	Paragraph 4.7 should be amended to include the requirement for Travelling Showpeople to be Members, or fulfil the requirements of the Guild of Travelling Showpeople of Great Britain.	The PPTS definition of Travelling Showpeople makes no reference to the requirement to be a member of the Guild of Travelling Showpeople therefore it is unnecessary to add this requirement to the policy	None
2.	GTAA overestimates need for plots for Travelling Showpeople	The GTAA 2014 outlines the need for Travelling Showpeople plots	None (See GTAA 2014)
3.	GTAA does not include all Travelling Showpeople sites in Central Bedfordshire	The GTAA 2014 resolves this issue	None (See GTAA 2014)

Section 5: Consideration of New Sites and Expansion of Existing Sites

Policy GT5: Assessing Planning Applications for Gypsy and Traveller Sites

	Issue	Response	Change Required
1.	The site selection process was flawed. Sites moved on and off the list with no explanation	No additional sites were added to the list of sites at Stage 3. The full site assessment was checked between the 17 January and 28 February 2013 Overview and Scrutiny Committees. It was found that three sites, Sites 40, 79 and 112 should have failed the Stage 2 assessment. These sites were consequently removed from Stage 3. Also the details of the site assessments for Sites 66 and 106 , that failed Stage 2 of the assessment were missing from the initial print of the Site Assessment Document, This was clearly explained at the Overview and Scrutiny Committee on the 28 February 2013.	None (See minutes from Sustainable Communities Overview and Scrutiny Committee 28 February 2013)
2.	Paragraph 5.2 as landowner, developer and consenting authority CBC should describe how the Council intends meeting such costs (including improvements to utilities, transport infrastructure, education etc.)	This is not an issue for the Plan.	None
3.	Paragraph 5.2 and Policy GT5 should include reference to safeguarding the protection of the historic environment.	Agree and make changes (see Section 2 Issue 1)	See Section 2 Issue 1: Add “Consideration of the need to protect the historic environment” to the list of bullets at Paragraph 5.2 and Policy GT5

4.	Paragraph 5.3 - The Council's own survey appears to go against national published guidance which states "Many Gypsies and Travellers express a preference for a rural location which is on the edge of or closely located to a large town or city consistent with traditional lifestyles and means of employment". It would be useful to publish (based on survey evidence) just how CBC's plan deviates from national guidance.	The Council considers the Plan is in line with national guidance	None.
5.	Paragraph 5.3 establishes a general presumption that sites outside existing settlements should be assumed as the most appropriate. This is a misinterpretation of National planning policy and on the underlying principle that in delivering new homes, the planning system should look to the creation of mixed, sustainable and integrated communities. The 'desires' of one sector of the housing market, admittedly a specialist one, is not a justification to set aside national policy and this paragraph should be deleted given that it conflicts with PPTS Policy H . The paragraph should be deleted.	Paragraph 5.3 is not inconsistent with national policy. It states "preference should be given to sites that are located close to existing settlements" however, sites within the countryside "will be considered where they are constraint free, or where any constraints could be satisfactorily mitigated."	None
6.	Paragraph 5.4 misrepresents National planning policy. Neither the NPPF or the PPTS 'suggest' that development in the Green Belt (specifically for gypsies or travellers) 'will usually be considered inappropriate'. Both National policy documents state it is inappropriate.	Agree and make changes	Change Paragraph 5.4 to read: "The NPPF and PPTS outline that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. The Development Strategy for Central Bedfordshire confirms

			that there is a general presumption against inappropriate development, and planning permission will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt. Sites within the Green Belt will only be allocated to meet a specific identified need.”
7.	Paragraph 5.5 add “and ensure that any development is of the highest standard and mitigates all impacts to the Green Belt when such development is permitted.	High quality site design is not relevant at this paragraph it is addressed in Policy GT5	None
9.	Paragraph 5.7 - if first tranche of developments fails to satisfy the need for pitches, what is the Council's coping strategy for accelerating phases 2 and 3 bringing forward planning applications for "developable" sites?	The Pitch Trajectory will be monitored annually and amended where necessary	None
10.	5.7 Planning applications will be judged using the policies in this Local Plan and the relevant policies set out in the Development Strategy for Central Bedfordshire as well as to National Planning Policy as a material consideration.	Agree and make changes	5.7 will be amended to read “Planning applications will be judged using the policies in this Local Plan and the relevant local policies set out in the Development Strategy for Central Bedfordshire and national policies set out in the NPPF and PPTS...”

11.	<p>Paragraph 5.8 to 5.13 - change in emphasis / importance regarding several of the rate-limiting criteria used to select sites and assess suitability e.g. flood risk which was one of the criteria used to discount potential sites during Stages 1 and 2. In downgrading the importance of such factors, sites that might have been discounted as unsuitable may warrant reassessment.</p>	<p>These are constraints to development and planning applications are assessed against local and national policy. The constraints were not considered of different importance in the Site Selection.</p>	None
12	<p>Paragraph 5.9 The NPPF establishes a general presumption in favour of sustainable development. Accordingly any proposal for a new site must be sustainable and promote alternative methods of transport. This paragraph should be amended to include additional provision as follows:</p> <ul style="list-style-type: none"> - Encourages alternative means of transport to the private motor car and is therefore linked by appropriate footpath/cycle routes on the linking public highway to wider community; - Has access to public transport at the site or the ability for this to be provided - Dependent on location and size, provides adequate open/play space for children through the provision of play space where established facilities are not easily accessible or are more than 100m walking distance from the site for the 0-5 year old age group. Play space for this age group should comprise doorstep playable space. Facilities for the 5-11 and 12+ age groups should also be provided within a suitable and safe distance of the site and where this is not possible then on site. 	<p>The policy has to pragmatically balance the desire to promote sustainable development with the legal requirement to provide sufficient sites. In some cases, sites with poorer access to services may be required as the existence of a site with poor access may be preferable to no site at all.</p> <p>Access to public transport is not a requirement for small scale housing development therefore whilst desirable cannot be a requirement for Gypsy and Traveller pitches.</p> <p>Provision of play space is addressed at Paragraph 5.9 “An area for children to play may be required where access to existing facilities is not available”</p>	None

13	Inconsistent with National Policy, given that Para. 4 of the DCLG's 'Planning Policy for Traveller Sites', March 2012, specifies that a particular aim of the Policy is the promotion of more private traveller site provision.	This is incorrect. The Council notes the preference for private sites. However as insufficient private sites came forward during the 'Call for Sites' the Council had to consider its own land. The Council has not yet established whether the sites allocated on land currently belonging to CBC will be developed as public or private sites.	
14	Paragraph 5.11 should be expanded to state that sites should be linked to existing communities/settlements by tarmac footpaths on at least one side of the linking highway.	Highways Access is considered at paragraph 5.9	None
15	Paragraph 5.13 should be redrafted to properly explain the difference between Travelling Showpeople and Gypsies	Paragraphs 4.1 and 4.2 provide the definition of Travelling Showpeople as states in the PPTS and adequately explain the different requirements of Travelling Showpeople compared with Gypsies and Travellers	Add at 3.1 the definition of Gypsies and Travellers from the PPTS. Add at Glossary definition of Gypsies, Travellers and Travelling Showpeople
16	Paragraph 5.14 When considering both new, windfall and expansion of existing sites, it might be appropriate in the context of this Plan to define a maximum density for pitches/plots.	The density of Gypsy and Traveller and Travelling Showpeople sites varies depending on the scale, location and number of occupants. There is no maximum density for sites, this will be dealt with on a site by site basis through the planning consent and in line with site licensing requirements	Amend paragraph 5.14 to state "... The density of Gypsy and Traveller and Travelling Showpeople sites varies depending on the scale, location and number of occupants. There is no maximum density for sites. On some sites there may be opportunities to subdivide or infill existing pitches/plots in order to provide additional accommodation.

17	<p>Paragraph 5.15 sub-section 2 fails to distinguish between sites located in areas where development is acceptable and those where there is a national presumption against it. As such this does not constitute robust guidance.</p> <p>2. Expansion of sites directly adjacent to the current boundary, providing sufficient land is available to meet the identified need and the existing site is not located within the Green Belt will be considered subject to there being no detrimental environmental impacts or to the amenity of site occupants or to neighbouring residents. New pitches would still need to meet the relevant licensing requirements.</p> <p>This would allow infilling within existing Green Belt sites but limit the expansion of these and the encroachment of the Green Belt generally; meeting one on the underlying principles of the Green Belt.</p>	<p>Site expansion in the Green Belt is not prohibited in the Plan. Expansion of sites will be determined on a site by site basis, any development in the Green Belt (which is considered inappropriate) has to demonstrate very special circumstances that clearly outweigh harm to the Green Belt.</p> <p>Amend Bullet 2 to say: “Expansion of sites directly adjacent to the current boundary, providing sufficient land is available to meet the identified need and this would not be detrimental to the amenity of site occupants or to neighbouring residents. New pitches would still need to meet the relevant licensing requirements.”</p>	<p>Amend Bullet 2 to say: “Expansion of sites directly adjacent to the current boundary, providing sufficient land is available to meet the identified need and this would not be detrimental to the amenity of site occupants or to neighbouring residents. New pitches would still need to meet the relevant licensing requirements.”</p>
18	<p>Paragraph 5.17 refers to the ‘countryside’ but also includes reference to ‘rural areas’.</p> <p>Policy F of the PPTS relates to mixed planning use traveller sites and this policy does not establish a exception to the NPPF provisions other than where the Council might adopt a rural exception policy under PPTS Policy D.</p> <p>This policy (Policy D) allows authorities to establish a rural site exception policy where it is viable and practical to do so when there is insufficient affordable land to meet traveller</p>	<p>Countryside and rural areas are synonymous for the purposes of the Plan.</p> <p>Not all business use is considered inappropriate development in the Green Belt therefore the suggested change is incorrect.</p>	None

	<p>needs. This exception policy however relates to small sites in small rural communities only. It does not create an exception for sites outside of a community, large sites or large Green Belt sites. Accordingly, this paragraph should be amended to avoid ambiguity as follows:</p> <p><i>5.17 The Gypsy and Traveller community tends to be self employed, sometimes running their businesses from the site on which their caravans are stationed. Gypsy and Traveller sites suitable for mixed residential and business uses should have regard to the safety and amenity of the occupants and neighbouring residents. Sites in the rural area will need to pay particular attention to minimising the impact of any business use on the countryside. Sites within the designated Green Belt are not appropriate for mixed uses.</i></p>		
19	<p>Policy GT5 fails to include a criterion for assessing the landscape impacts of development particularly within the Chilterns AONB.</p>	<p>Add “and any landscape designation” to bullet 6 in Policy GT5</p>	<p>Add “and any landscape designation” to bullet 6 in Policy GT5</p>
20	<p>Policy GT5: Assessing planning applications for Gypsy & Traveller sites. Sites for gypsies and travellers will only be granted planning permission providing that all of the following criteria are met.</p>	<p>Change GT5 to state “Sites for gypsies and travellers will be granted planning permission providing that all of the following issues are addressed:”</p>	<p>Change GT5 to state “Sites for gypsies and travellers will be granted planning permission providing that all of the following issues are addressed:”</p>

21	<p>The preamble to the policy sets out a number of factors that will be considered when assessing planning applications. These include flood risk, highway access and residential amenity. In relation to the latter, it is stated that in order to protect occupants of Gypsy and Traveller and Travelling Showpeople sites, such “<i>sites will not be permitted in the immediate vicinity of railway lines, water bodies or power lines. Consideration will need to be given to noise and disturbance arising from roads adjacent to or in close proximity to sites.</i>” (paragraph 5.11). Policy GT5 includes a range of criteria that planning applications for Gypsy and Traveller sites will be assessed against but omits any reference to these exclusions. The policy therefore needs to be amended to include these criteria.</p>	<p>Agree and make changes “sites will not be permitted that are immediately adjacent to railway lines, water bodies or power lines.”</p>	<p>Add to GT5: “sites will not be permitted that are immediately adjacent to railway lines, water bodies or power lines.”</p>
22	<p>Add a separate bullet point which states the importance of considering the impact of the development on biodiversity features (including statutory and non-statutory designated sites as well as species and habitats of principle importance to the purpose of conserving biodiversity). The impact on biodiversity needs to be assessed before any enhancement or mitigation measures are considered, which could include landscaping. This ensures that the proposed enhancements and/ mitigation is appropriate. Including biodiversity from the start, rather than as an after-thought will produce better results and bring the policy in line with the National Planning Policy Framework (NPPF).</p>	<p>Change GT5 bullet 6 to read: “Ensure that any detrimental impact upon the character and appearance of the locality is minimised and specifically addressing impact on biodiversity, nature conservation and landscape designations this could include the use of hard and soft landscaping.”</p>	<p>Change GT5 bullet 6 to read: “Ensure that any detrimental impact upon the character and appearance of the locality is minimised and specifically addressing impact on biodiversity, nature conservation and landscape designations this could include the use of hard and soft landscaping.”</p>

23	<p>Policy GT5 Insert as new Bullet 1:</p> <p>Satisfactory evidence is submitted that shows that the applicant fulfils the requirements of the definition of being a Gypsy or Traveller (or travelling showperson when his criteria is considered in the context of Policy GT6) and that the application is therefore entitled to be considered under the auspices of this Local Plan;</p>	<p>Add definition of Gypsies, Traveller and Travelling Showpeople as set out in the PPTS to the glossary</p>	<p>Add definition of Gypsies, Traveller and Travelling Showpeople as set out in the PPTS to the glossary</p>
24	<p>Policy GT5 Expand Bullet 2 to include at the end of the current text:</p> <p>'specifically on education and health and the amenities of the adjoining community</p>	<p>Add "and services" to the end of bullet 2</p>	<p>GT5 Add "and services" to the end of bullet 2</p>
25	<p>Policy GT5: Reword Bullet 4 to read:</p> <p>Satisfactory and safe vehicular and pedestrian access to and from the public highway is provided to ensure that all vehicles can enter/leave the site and that the access enables the safe manoeuvrability of living accommodation to the site and the pitch (or plot when his criteria is considered in the context of Policy GT6) without detriment to other road users or the requirement of police/other support; all accesses must comply completely with the relevant DoT highway design requirements specifically sight lines, access radii, acceleration/deceleration lanes etc. All roads linking a site to local facilities, specifically schools, will be required to have a properly specified footpath running along one side of the carriageway for the entire distance.</p>	<p>These issues are covered by the existing content of GT5. Highways Development Control are consulted on all Gypsy and Traveller planning applications and will address all issues in relation to vehicular and pedestrian access to and from the site at that stage.</p>	<p>None</p>

26	<p>Policy GT5: Additional bullets are required as follows:</p> <ul style="list-style-type: none"> -Suitable arrangements are made to prevent any ground contamination from the activities to be undertaken on the site particularly where the site adjoins agricultural land - A full public consultation exercise has been carried out with the local community and that the application is accompanied by a Statement of Community Engagement setting out all of the activities undertaken, identifying all of the comments received and detailing where appropriate how these have been addressed within the application submission. 	<p>Planning applications for small scale development are not required to submit a Statement of Community Engagement.</p>	<p>None</p>
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Policy GT6: Assessing Planning Applications for Travelling Showpeople Sites

	Issue	Response	Change Required
1.	Fails to consider paragraphs 10, 11, 14, 15, 23, 24 or 28 of the PPTS.	Policy GT6 is compliant with the PPTS.	None
2.	Insufficient protection afforded to the Green Belt. It should state “Traveller sites are inappropriate development which is by definition harmful to the Green Belt and planning permission will not be granted except in very special circumstances. Substantial weight should be given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”	See GT5 Issue 6, Paragraph 5.4 will be changed to “The NPPF and PPTS outline that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development...” Policy GT6 already makes reference to the protection of the Green Belt stating “Planning permission for Travelling Showpeople sites in the Green Belt will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt.”	Change Paragraph 5.4 as noted in GT5 Issue 6

Policy GT7: Assessing Planning Applications for the Expansion of Existing Gypsy and Traveller and Travelling Showpeople Sites

	Issue	Response	Change Required
1.	Policy GT7 makes no reference to the Green Belt, restriction on traveller sites in the Green Belt should also apply to the expansion of existing site.	Agree and make changes	Add to Policy GT7: "Planning permission for Gypsy and Traveller or Travelling Showperson sites in the Green Belt will only be granted where there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt."
2.	Policy GT7 introduces the term 'countryside' into the Plan without providing a suitable definition. 'Countryside' is referred to in a different way in the PPTS to Green Belt (paragraph 12 as opposed to 14 & 15).	Countryside and rural areas are synonymous for the purposes of the Plan	None

Policy GT8: Provision of Space/Facilities for Business Use on Permanent Gypsy and Traveller Sites

	Issue	Response	Change Required
1.	Policy GT8 makes no reference to the Green Belt, restriction on traveller sites in the Green Belt should also apply to business use on sites.	Agree and make changes	Add to Policy GT7: "Planning permission for business use in the Green Belt will be granted where the use is acceptable or there are demonstrable, very special circumstances that clearly outweigh harm to the Green Belt."

2.	It is not clear if at a later date further work will be undertaken to prioritise potential sites from the stage 3 “pool” or if an additional process will be undertaken to make later allocations.	If additional sites need to be found to meet an identified need the sites at Stage 3 of the Site Assessment may be considered again	None.
3.	Change Policy GT8: Provision of space/facilities for business use on permanent gypsy & traveller sites. Planning applications for business use on or directly adjoining gypsy & traveller sites for the gypsy and traveller community will only be granted provided that all of the following criteria are met.	Change GT8 to state “Planning applications for business use on or directly adjoining gypsy & traveller sites for the gypsy and traveller community will be granted provided that all of the following issues are addressed.”	Change GT8 to state “Planning applications for business use on or directly adjoining gypsy & traveller sites for the gypsy and traveller community will be granted provided that all of the following issues are addressed.”
4.	Further the policy should seek to establish entitlement and include a bullet that requires: <ul style="list-style-type: none"> • <i>Appropriate evidence is submitted that demonstrates that the business use proposed relates specifically to Gypsies and Travellers and not to any commercial or business activity. This requirement will be protected through an appropriate planning obligation/legal agreement.</i> <p>This additional bullet is required to ensure that the benefits of this policy relate solely to bone-fide Gypsies & Travellers (and travelling showpeople) and not to individuals whose business activities have exceeded the definition, activities and heritage that the policy seeks to protect.</p>	The policy states “the use should relate to at least one of the households on the site” Change GT8 to state “Planning applications for business use on or directly adjoining permanent Gypsy and Traveller sites for the Gypsy and Traveller community will be granted provided that...”	Change GT8 to state “Planning applications for business use on or directly adjoining permanent Gypsy and Traveller sites for the Gypsy and Traveller community will be granted provided that...”

Section 6: Safeguarding Sites

	Issue	Response	Change Required
1.	Paragraph 6 would "safeguarding" facilitate and pave the way to CBC 'disposing' of sites using the transfer of community assets?	The Council's policy towards transfer of community assets is not matter for the Plan.	None

Part 2

Section 7: Gypsy and Traveller Site Allocations

	Issue	Response	Change Required
1.	<p>Site assessment process was flawed because:</p> <ul style="list-style-type: none"> - Not transparent - Subjective - Inconsistent application of the elements of the assessment criteria. - Assessment process have not been subjected to scrutiny by an independent organisation. - Green Belt criteria should have been used to sieve out sites at Stage 1 - Final decision on site selection was made entirely by members of the Council and is unjustified 	<p>The site assessment criteria were agreed at the public Sustainable Communities Overview and Scrutiny Committee 10 April 2012. The Gypsy and Traveller Local Plan including Site Assessment will be subject to an Examination in public by an independent Planning Inspector. Green Belt sites were included as the PPTS allows the removal of sites within the Green Belt to meet a specific need. The allocation of sites was made through a democratic process at public meetings.</p>	None
2.	<p>The Council has failed to comply with the Duty to Cooperate</p>	<p>The Council does not consider there has been a failure in the duty to cooperate with neighbouring authorities. The extent of consultation undertaken is documented in the Consultation Statement</p>	None
3.	<p>The need for a full ecological survey is noted in the Site Assessment but not in the site specific policies</p>	<p>Agree and make changes</p>	<p>Add to policies GT10, GT11, GT12, GT13, GT14, GT15, GT16 and GT17 “a full ecological survey should accompany the planning application”</p>

Policy GT10: Land west of Barton Le Clay (known as Site 16 in the Site Assessment)

	Issue	Response	Change Required
1.	<p>Inappropriate development in the Green Belt with no exceptional circumstances. The allocation is therefore contrary to Government guidance and advice contained in NPPF and PPTS. Developing this site will set a precedent for development in the Green Belt</p>	<p>The PPTS states “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes 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, it should do so only 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.”</p> <p>In line with this policy, the Gypsy and Traveller Local Plan seeks to make a single limited alteration to the defined green Belt boundary to accommodate the Barton site. As the site is to be removed from the Green Belt it can no longer be considered to be inappropriate development in the Green Belt. Nor is it considered that development of this site will set a precedent for development in the Green Belt as the allocation of this site represents a single exceptional limited alteration to the defined green Belt boundary.</p>	None

2.	Harm to views from the Sharpenhoe Clappers Area of Outstanding Natural Beauty and Barton Hills NNR	Although the field is open in character, there is an extensive framework of shelterbelts and hedgerows. Careful design of the site close to the eastern boundary together with an enclosing new shelterbelt would enable the site to be integrated. The setting of the AONB requires protection, but a well screened, limited development would associate with existing development to the east.	None
3.	Question the need to develop another site in close proximity to existing Gypsy & Traveller site in Barton-le-Clay, based at 1, Old Acres on the Pulloxhill Road. Site at Pulloxhill should be expanded instead rather than allocating the site at Faldo Road.	The GTAA 2013 identified a need for 157 pitches in Central Bedfordshire to 2031. This site was selected to help meet that need. The GTAA 2014 identifies additional need, t An extension to the Pulloxhill site (GT14) is necessary in addition to the development of the proposed site at Barton to help meet that need.	None
4.	Although it is agreed that the site is not within flood zone 3, the site gets waterlogged and is prone to flooding	The site is not located in Flood Zone 3 and there is no significant risk of surface water flooding	None
5.	brownfield land should be used in preference to Green Belt land.	The Council agrees that brownfield sites are preferable for development. However, non brownfield sites must be considered in order to meet the need for Gypsy and Traveller pitches by 2031	None
6.	Located on the other side of A6 - therefore not suitable due to its remoteness and speed limit of 70 mph. It would be dangerous to cross the A6 on foot to reach the services and shops at Barton le Clay. Residents will use motor vehicles to travel short distances into the local village. No public transport or footpaths.	Whilst the Council acknowledge the access across the A6 to the services in Barton is not ideal, there is an existing crossing point and the Council will consider appropriate traffic calming options to mitigate safety concerns	None

7.	Proximity to an Industrial Estate – risk of noise, dust and pollution.	There is a large bund between the proposed site and the Industrial Estate limiting the harm presented by the Industrial Estate to residents of the site	None
8.	Proximity to A6 – risk of noise, dust and pollution.	There is significant planting and a tree belt between the proposed site and the A6, limiting the risk of noise, dust and pollution from the A6	None
9.	Would lead to businesses on the industrial estate closing down, which would result in unemployment.	The development of a Gypsy and Traveller site should have no impact on the industrial estate.	None
10.	Central Bedfordshire has a duty of care to provide for settled communities and to listen to their wishes and needs.	Central Bedfordshire Council does have a duty of care to provide for both the settled community and the Gypsy and Traveller community. This is identified in the Housing Act 2004.	None
11.	Loss of productive agricultural land which is farmed under a tenancy agreement.	Whilst the Council accept the development of this site would result in the loss of agricultural land, sufficient non agricultural sites could not be found to meet the accommodation needs of the Gypsies and Travellers the Council is required to provide under the Housing Act 2004.	None
12.	Concern over potential impact on the setting of the Old Watermill Grade II listed building.	Appropriate screening and planting would be required to mitigate visual impact	None
13.	English Heritage have not been consulted – Potential impact on heritage assets.	English Heritage were consulted. In relation to this site they suggested there are possible impacts on the Grade II listed Barton Mill to the south-east. However, impacts are not likely to be substantial	None
14.	The requirement for landscaping and screening would harm the openness of the countryside.	Additional planting required to screen development would be in keeping with the existing vegetation	None

15.	Harm to wildlife including Red Kites	Central Bedfordshire Council Ecologists do not consider the development of the site would harm Red Kites	None
16.	The combined effect of two sites will place undue pressure on services. The local schools and GP services are at maximum capacity.	The Council has a duty to provide school places for all residents within Central Bedfordshire. Should a need for additional school places arrive this will be addressed	None
17.	The site will dominate the nearest settled community.	The Council considers the nearest settled community to the proposed site to be Barton Le Clay. Barton Le Clay has a population of around 4,990 people. The Council does not consider that a 10 pitch Gypsy and Traveller site would dominate the nearest settled community.	None
18.	No gas or electricity to site	The site is not currently developed. Appropriate utilities would be required at development stage	None
19.	Not compliant with paragraph 156 of NPPF	Paragraph 156 of the NPPF states “Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: <ul style="list-style-type: none"> ● the homes and jobs needed in the area; ● the provision of retail, leisure and other commercial development; ● the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); ● the provision of health, security, community and cultural infrastructure and other local facilities; and ● climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.” 	None

		The Gypsy and Traveller Local Plan complies with this policy by including strategic policies to deliver homes for Gypsies and Travellers in Central Bedfordshire.	
20.	Public right of way crosses the site	The public right of way does not cross the part of the site that is recommended for development. The development should not prevent use of the public right of way	None
21.	No justification of need	The GTAA 2014 identifies a significant need for pitches in Central Bedfordshire to 2031	None (See GTAA 2014)
22.	Risk to archaeology on site	Addressed in policy	None
23.	Mixed use rural exception sites should not be permitted as they do not conform with local policy	The site is not a rural exception site. The site is a Gypsy and Traveller site to be removed from the Green Belt.	None
24.	Cost of developing site will be excessive	The Housing Act 2004 requires Central Bedfordshire Council to identify unmet need for pitches and meet any unmet need	None
25.	Site will put a strain on the water table	There is not evidence to substantiate this. The Environment Agency's consultation response stated " All of the site allocations fall within Flood Zone 1 (lowest probability of flooding) are therefore suitable locations of Gypsy and Traveller sites."	None

26.	<p>The results from the Accession software package are not credible. The quality of this data was found to be flawed in its measuring of some sites and this resulted in the removal of those sites from the process as the data as deemed incredible. The data collected from Accession is based on assumptions (see Gypsy and Traveller Local Plan Site Assessment May 2013 Appendix 1: Technical Report on Accessibility data Item 3.0- Assumptions) Accession has made assumptions that amenities within Barton le Clay such as the middle and lower school and GP practice can all be reached within 20 minutes of walking from Site 16, across the A6 dual carriageway and through the village. This cannot be done on foot within this timescale and is another reason why the Policy is not sound.</p>	<p>The results have been verified the Council stands by the assessment.</p>	None
27.	<p>Inconsistent site selection process, (a number of people referenced specific sites) more suitable sites were deselected at Stage 2 and Stage 3.</p>	<p>The members made their decision on the basis of all the information available, their decision was taken in public and will be examined by an independent Planning Inspector</p>	None

Policy GT11: Land south of Dunton Lane, Biggleswade (known as Site 55 in the Site Assessment)

	Issue	Response	
1.	No consultation undertaken on the Strategic Environmental Assessment	The SEA was published alongside the Plan with all relevant supporting documents	None
2.	Site should be removed and replaced by site 26.	This comment was made in a number of representations but specifically by the tenant farmer who farms both Site 55 and Site 26. As Site 26 is further away from the Scheduled Ancient Monument, has an existing shelterbelt that could provide screening to mitigate harm to openness, is further away from the allocation of the Travelling Showperson Site and along a straighter part of the road. It appears Site 26 is less constrained than Site 55.	The Committee may wish to consider replacing Site 55 with Site 26 as it is less constrained.
3.	Dunton Lane is a busy road with low visibility, and a blind spot.	See above (Issue 2)	See above (Issue 2)
4.	Site has an open aspect - intrusive development into the open countryside	See above (Issue 2)	See above (Issue 2)
5.	Archaeological Notification Area recorded by Bedfordshire Heritage Record, Stratton Moat Scheduled Ancient Monument	Central Bedfordshire Council Archaeologists suggest this is an inappropriate site due to the location within the Setting of Stratton Moat and associated earth works. Site 82 will also present archaeological issues. However, this site could be replaced with Site 26 which has no known archaeological significance	See above (Issue 2)
6.	Too close to the planned showpeople site at Kennel Farm.	Whilst the Council acknowledges the close proximity of the two allocations the sites are for different purposes, one an allocation for a 10 pitch Gypsy site and the other a 4 pitch Travelling Showperson site	See above (Issue 2)
7.	Social and community facilities and services in Biggleswade are not within easy reach. No public transport from site	A sustainable site does not necessarily have to be accessible by foot or even public transport providing adequate services can be accessed in some format.	None

8.	Unfavourable effect upon the continuing delivery of the King's Reach housing development, an important component in the Development Strategy. Allocation of the site conflicts with the strategic growth of the eastern expansion on Biggleswade	The council has no proof of conflict between land east of Biggleswade and the development of a Gypsy and Traveller site at Land south of Dunton Lane	None
9.	No footpaths or pavements for pedestrians to walk to Biggleswade.	Whilst the Council acknowledge this is a relevant concern, this issue alone was not sufficient to discount the site	None
10.	Site forms part of a disproportionate allocation for Gypsies and Travellers in the east of Central Bedfordshire.	The existing profile of Gypsy and Traveller sites across Central Bedfordshire is predominantly in the south of Central Bedfordshire, with the most significant population in the Billington area. There is a concentration of sites around excepted travelling routes along the A1 and A5. The allocations in the Plan do not represent a disproportionate level of provision in the east of Central Bedfordshire	None
11.	Concern regarding lack of infrastructure and the supply of utilities to the site.	The site is not currently developed. Appropriate utilities would be required at development stage	None
12.	Too close to the planned showpeople site at Kennel Farm.	Whilst the Council acknowledges the close proximity of the two allocations the sites are for different purposes, one an allocation for a 10 pitch Gypsy site and the other a 4 pitch Travelling Showperson site	None
13.	The site is nearer to Biggleswade than to Dunton and is not midway as stated in paragraph 7.6 of the Plan.	The site is closer to Biggleswade than Dunton.	Should the site remain within the Plan amend text to note the site is closer to Biggleswade rather than midway between Biggleswade and Dunton

14.	Loss of Grade 2 farmland is contrary to NPPF	Whilst the Council accept the development of this site would result in the loss of agricultural land, sufficient non agricultural sites could not be found to meet the accommodation needs of the Gypsies and Travellers the Council is required to provide under the Housing Act 2004.	None
15.	Part of the Countryside Stewardship Scheme	Any measures undertaken under the Countryside Stewardship Scheme would be retained wherever possible	None
16.	Protected species identified on site	Central Bedfordshire Council Ecologists note this site is not an area of ecological significance	None
17.	Power cables cross the site	This is not correct	None
18.	Site had same issues as Site 49 which was removed at Stage 2	This cumulative impact upon the Scheduled Ancient Monument of allocating Site 82 and Site 49 would be significantly greater than allocating site 55 .	None
19.	Excessive pressure on local amenities including schools and GPs	The east of Biggleswade development will be providing significant new facilities including medical facilities, lower school and play areas. This will be sufficient to accommodate the population of a 10 pitch Gypsy site	None
20.	The site is subject to flooding	The site is not within the Flood Zone 2 or 3 and there is not a significant risk of surface or ground water flooding	None
21.	Inappropriate development in the Green Belt	This site is not in the Green Belt	None
22.	No consultation with English Heritage	English Heritage were consulted as part of the Pre-submission consultation period. A meeting was also held to discuss implications of site allocations and potential mitigation. Should a further pre-submission consultation be held, English Heritage would again be asked to comment on changes to the Plan	None

23.	Dunton Parish Council were not informed of the site until January 2013	All sites were made public in January 2013. No parish Council's were informed before this time	None
24.	There is a conflict between the Site Assessment and Sustainability Appraisal	The two are separate but related processes.	None
25.	Difficult for Council waste disposal and sewage removal to access site. Sewage from the site may contaminate locally sourced food	The site will be serviced by an appropriate sewage treatment plans. There will be no discharge of foul sewage to land or watercourses.	None
26.	The site lies within Bedfordshire and River Ivel Internal Drainage Board District. Any proposed discharge surface water into adjacent watercourses will require a land drainage consent from the Board	The Bedfordshire and River Ivel Drainage Board would be consulted on any planning application for the site and relevant consents sought	None
27.	Risk to archaeology	Add " An archaeological field investigation being undertaken prior to an application being submitted."	Add " An archaeological field investigation being undertaken prior to an application being submitted."

Policy GT12 Land east of Potton Road Potton (known as Site 58 in the Site Assessment)

	Issue	Response	Change Required
1.	Failure to comply with the Duty to Cooperate, Inadequate consultation with locals and neighbouring authorities. Contravenes section 178, 179 of NPPF and A6a of PPTS	<p>Paragraphs 178 and 179 state “Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.”</p> <p>Paragraph A6a of the PPTS states”</p> <p>In assembling the evidence base necessary to support their planning approach, local planning authorities should: a)pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with</p>	See Section 1 Issue 2

		<p>travellers themselves, their representative bodies and local support groups).”</p> <p>The Council has endeavoured to fulfil the duty to cooperate, holding meetings with neighbouring authorities to discuss the Plan making process. When undertaking the GTAA 2014 all relevant stakeholders were asked to contribute, including all neighbouring authorities, Gypsy and Traveller and Travelling Showperson representative groups and Councillors with sites in their areas. As documented in the Consultation Statement all regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 regarding public consultation were followed during the plan making process.</p>	
2.	Too close to the existing site in Potton, expansion of existing site would be preferable to development of a new site	<p>The council acknowledges that some members of the settled community and the Gypsy and Traveller community would prefer an extension to the existing site rather than the development of a new site.</p> <p>Extension of the existing site was not initially considered in the Site Assessment as the Council has a preference for smaller private sites. The Council recognises that it would not be appropriate to extend the existing site in addition to allocating a new site. Therefore in response to comments received, the Committee may wish to remove this site from the Plan to enable the Council to consider extending the existing site. This extension would be a windfall development and would not be included within the Plan as the site did not undergo the initial Site Assessment.</p>	The Committee may wish to remove this site from the Plan in order to consider the expansion of the existing Potton site outside the Plan making process.

3.	Too close to existing site	See above (Issue 2)	See above (Issue 2)
4.	Significant negative impact on rare and already fragmented heath land character of Greensand Ridge and negative impact on rare biodiversity associated with the rare habitat.	Central Bedfordshire Council acknowledges that the site is within both an area of high landscape character sensitivity and a Biodiversity Opportunity Area. However, all sites reaching Stage 3 of the Site Assessment presented certain issues. On balance; the benefit created by the site may outweigh the harm to the landscape. Furthermore, significant planting will be required to mitigate harm to the landscape and a full ecological assessment would be required prior to development. However, the Committee may wish to consider the extension of the existing Potton site rather than the development of a new site. See above (Issue 2)	See above (Issue 2)
5.	Contravenes section 54,109,112, of NPPF and B9a of PPTS	Paragraph 54 states "In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs." The Plan complies with this policy. There is currently overcrowding on the Potton site, additional provision in the area would alleviate this pressure. Paragraph 109 states "The planning system should contribute to and enhance the natural and local environment by:	None

		<ul style="list-style-type: none"> ● protecting and enhancing valued landscapes, geological conservation interests and soils; ● recognising the wider benefits of ecosystem services; ● minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; ● preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; And ● remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate." All issues would be dealt with when considering a planning application through the policies in the Plan. <p>Paragraph 112 states "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." The Site Assessment took account of this, giving High Grade Agricultural land a score of 0 whilst brownfield land was given the highest available score of 5 points. As insufficient brownfield sites came forward through the Call for Sites process,</p>	
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		Greenfield and agricultural land had to be considered in order to enable the Council to fulfil its obligation to meet the accommodation needs of the Gypsy and Traveller community alongside the settled population. Section B9a of the PPTS states “ Local planning authorities should, in producing their Local Plan: identify and update annually, a supply of specific deliverable sites ⁷ sufficient to provide five years’ worth of sites against their locally set targets.” The Plan complies with this policy by allocating sufficient pitches to meet the 5 year pitch requirement against the target set in the GTAA	
7.	Loss of prime agricultural land	Whilst the Council accept the development of this site would result in the loss of agricultural land, sufficient non agricultural sites could not be found to meet the accommodation needs of the Gypsies and Travellers the Council is required to provide under the Housing Act 2004.	None
8.	Next to working quarry dangers presented by dust and noise. Also danger presented by reservoir	Central Bedfordshire also considers the site to be a safe distance from the quarry and reservoir.	None
9.	Site selection scoring corrupt /flawed	This is incorrect	None
10.	No gas supply/ drainage and other services	The site is not currently developed. Appropriate utilities would be required at development stage	None
11.	Dangerous unlit road with no footpath	This matter would be reviewed in any future planning application	None
12.	No public transport or amenity	The site is considered to be sustainable as it is within 30 minute walking distance of both lower and middle schools and a local food store.	None

13.	Environment Agency not consulted	The Environment Agency's consultation response stated "All of the site allocations fall within Flood Zone 1 (lowest probability of flooding) are therefore suitable locations of Gypsy and Traveller sites."	None
14.	South Cambridgeshire District Council and Gamlingay Parish Council not consulted.	All statutory consultees were consulted during the statutory consultation periods. See Consultation Statement for details of consultation. All statutory consultees will again be asked to comment on any significant changes to the Plan during a pre-submission consultation	None (see Consultation Statement)
15.	Dominated nearest settled community of "The Heath" Noise and light pollution will negatively affect homes in the area	Central Bedfordshire Council does not accept that the allocation of the site will lead to the Gypsy and Traveller population dominating the nearest settled community. Potton (1.5km from site to centre of Potton) and Gamlingay (2.5km from site to centre of Gamlingay) are the nearest settlements to the site, the development of up to 10 Gypsy and Traveller pitches would not 'dominate' the population of either of these settlements. Whilst a Gypsy and Traveller site may lead to increased noise levels, this is not considered to make the development of the site unacceptable	None
16.	Limited school places	The Council has a duty to provide school places for all residents within Central Bedfordshire. Should a need for additional school places arise this will be addressed	None
18.	Doubt if Councillors visited the site	All Councillors were provided with the opportunity to visit all sites that reached Stage 3 of the assessment process	None

19.	No evidence of unmet need for Gypsy and Traveller pitches in Potton	This is incorrect, there is overcrowding at the existing site in Potton necessitating additional provision in the area.	None
20.	Classified as Greenfield – should be 3a High Quality Agricultural land	The scoring could only take account of agricultural grade 1 and 2 and by definition agricultural land is a Greenfield site.	None
21.	Rejected for housing development why is it suitable for G&T	There is no record of a planning application being made on the site for any development	None
22.	10 pitches too large contrary to PPTS	Whilst the Council has a preference for smaller sites, the Council has a duty to meet the accommodation needs of the Gypsy and Traveller community in Central Bedfordshire, the significant level of need necessitates the provision of some larger sites	None
23.	No explanation of how buffer zone will be created to protect wildlife	The policy will require an ecological survey to be conducted and any necessary mitigation measures will be put in place	None

Policy GT13: Land east of Watling Street and south of Dunstable (known as Site 92 in the Site Assessment)

	Issue	Response	Change Required
1.	Inappropriate development in the Green Belt and Chilterns AONB, no exceptional circumstances	The site is an existing Gypsy and Traveller site with permission for 6 permanent pitches. See planning permission for issues and mitigations.	None
3.	The A5 is a dangerous road with no foot or cycle access to nearest services	The existing residents are content with access to services and Highways Agency have raised no objections to previous planning applications on the site	None
4.	Noise pollution from A5 harmful to residents of the site	Appropriate landscaping and boundary treatments have been implemented to ensure residential caravans are an adequate distance from the highway.	None
5.	No justification for extension of site	The GTAA 2014 outlines the need for an additional 165 pitches across Central Bedfordshire to meet the accommodation needs of the Gypsy and Traveller community to 2031. The specific details regarding the extension of this site are documented in the planning application	None

Policy GT14: 1 Old Acres, Barton Road, Pulloxhill (known as Site 116 in the Site Assessment)

	Issue	Response	Change Required
1.	The current site is unauthorised development, with a valid enforcement notice which has been upheld on appeal. The land should, therefore, not be considered as brownfield land. It should be treated as agricultural land located in the Green Belt. Because of the planning history of the site, there is concern that the allocation of the site would encourage unauthorised development and undermine enforcement.	The site has permanent permission and is not in the Green Belt	None
2.	Loss of high grade agricultural land	The site is an existing Gypsy and Traveller site that is not currently farmed. The allocation of this site does not require the loss of any high grade agricultural land	None
3.	Site is located in open countryside outside of the envelope of any existing settlements. It is not suitable as a rural exception in the Green Belt	The site is not located within the Green Belt	None
4.	Increase in traffic because of reliance on private transport. Barton Road has no pavement or street lighting. There is no safe access point.	The site is an existing site with suitable access	None
7.	Concern that the development would spoil the views from Sharpenhoe Clappers Area of Outstanding Natural Beauty	The Council does not agree with this statement.	None
8.	Some Support expressed for the use of this site providing capacity does not exceed 13 pitches.	Noted, the site is allocated for 13 pitches	None
9.	Some people have expressed support for the allocation of this site providing site off Faldo road is removed.	The Council does not believe any relevant issues have been presented to necessitate the removal of Policy GT10. The need for pitches necessitates the delivery of both sites	None
10.	Any expansion of the site will mean that the site population will dominate the settled community of Kitchen End.	It is an isolated site situated between Barton and Pulloxhill and is not considered to dominate either nor is it considered to dominate Kitchen End	None

11.	Site is located 20-30 minutes walk from the nearest services and facilities at Barton.	The residents are content with the site location	None
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Policy GT15: Land south of Fairfield (known as Site 76 in the Site Assessment)

	Issue	Response	Change Required
1.	Entrance to the site is on a road which experiences heavy traffic flows. Public highway fronting this Site is controlled by Hertfordshire County Council. CBC therefore has no control over the road or its speed limit. Visibility splays required by North Hertfordshire District Council cannot be met therefore planning permission is likely to be refused by North Hertfordshire District Council.	Central Bedfordshire Council would determine the planning application and would consult Hertfordshire County Council at such time an application was made.	None
2.	Concern regarding high vehicle speeds and a dip in the road which means poor visibility and an unsafe access. Would require a quality junction which would have to conform to the requirements of a two lane carriageway.	We anticipate it will be possible to provide a safe and satisfactory access to the site	None
4.	No water and sewerage facilities on site	This is not an existing site. Appropriate sewage facilities and utilities would be required at development stage.	None
5.	Development in the countryside which is not consistent with the NPPF. Negative impact on the landscape and environment, loss of established trees, the site would require significant landscaping	Trees would be retained wherever possible and it is considered that any negative impacts could be mitigated with significant landscaping	None
6.	Located in Flood Zone 3. Concern regarding flooding of the site's frontage during periods of heavy rainfall. This forces drivers to venture onto the lane of oncoming traffic.	This site is not located within the flood zone	None
7.	Lack of social and community facilities, particularly schools to meet the needs of the increase in population.	The Council has a duty to provide school places for all residents within Central Bedfordshire. Should a need for additional school places arrive this will be addressed	None

8.	Danger presented because of location close to sewage treatment works.	There is no anticipated danger presented by the location of the sewage treatment works. The new Fairfield housing development is located nearer to the sewage treatment works than site 76.	None
9.	Productive agricultural land with lifetime tenancy.	Whilst the Council accept the development of this site would result in the loss of agricultural land, sufficient non agricultural sites could not be found to meet the accommodation needs of the Gypsies and Travellers the Council is required to provide under the Housing Act 2004.	None
10.	There should be additional criteria introduced in the policy to include: appropriate landscaping to minimise visual effects; a noise and odour assessment prior to a planning application due to proximity to Stotfold Road, and the water treatment works	Agree, add the requirement for an odour assessment to the policy	Amend policy GT15 to include the requirement of an odour assessment prior to development
12.	Harm to wildlife	A full ecology survey will be required at planning application stage	None
13.	Not in keeping with Grade II Fairfield Hospital, Fairfield Hall	The site is a reasonable distance away from the Grade II building so as not to have a negative impact on the setting	None
14.	No public transport	Access to public transport is not a requirement for small scale housing development therefore whilst desirable cannot be a requirement for Gypsy and Traveller pitches.	None
15.	Sloping site with a gradient unsuitable for caravans	It is considered that this issue can be mitigated	None
16.	Site to create noise pollution	Appropriate boundary treatment and landscaping and standoff from the edge of the site will minimize any impact in terms of noise	None
17.	Danger presented by proximity to Pix Brook Flood storage Reservoir	The site is located a sufficient distance away from Pix Brook so as not to present significant danger	None
18.	Danger presented by location 559m from open water at Blue Lagoon	The site is located a sufficient distance away from the Blue Lagoon so as not to present significant	None

		danger	
20.	There is no need for pitches in Fairfield	The GTAA 2014 identifies a significant need for pitches	None
21.	Outside the settlement envelope	It is outside the settlement envelope. However, this is not sufficient to remove it from the site selection process	None
22.	Danger to residents from farm equipment and pesticides	Contaminated land survey required at planning application stage and the site would have sufficient boundary treatment to prevent loss of amenity from farming activities	None
23.	250m from a sewage treatment works, Anglian Water suggest a minimum exclusion zone of 400m	The Minerals and Waste Local Plan states "Proposals for sensitive development within 400 metres of an existing waste water treatment works will be subject to a risk assessment. The risk assessment will inform the decision as to whether the sensitive development will be permitted, and whether mitigation is required to address environmental and amenity issues raised by the proposal".	Add the requirement for a risk assessment to policy GT15
24.	Not compliant with national and local policy, in particular Policy 24 of the Development Strategy	It is not considered that the provision of a 10 pitch Gypsy site will overwhelm the transport network	None
25.	Not prepared in line with Duty to Cooperate, North Hertfordshire District Council were not given the opportunity to comment	The Council has endeavoured to fulfil the duty to cooperate, holding meetings with neighbouring authorities to discuss the Plan making process. When undertaking the GTAA 2014 all relevant stakeholders were asked to contribute, including all neighbouring authorities, Gypsy and Traveller and Travelling Showperson representative groups and Councillors with sites in their areas. As documented in the Consultation Statement all regulations set out in the Town and Country Planning (Local Planning) (England) Regulations	None

		2012 regarding public consultation were followed during the plan making process.	
26.	Electrical substation on site	This is incorrect	None
27.	Risk to archaeology	Add " An archaeological field investigation being undertaken prior to an application being submitted."	Add " An archaeological field investigation being undertaken prior to an application being submitted."

Policy GT16: Land East of the M1, Tingrith (known as Site 78 in the Site Assessment)

	Issue	Response	Change Required
1.	The needs of the current occupants to remain on the site have not been justified.	This matter will be dealt with through future planning applications rather than the Plan making process. The current temporary consent is based on the demonstration of very special circumstances. The site remains within the Green Belt and any future application would therefore have to continue to demonstrate very special circumstances	None
2.	Inappropriate development in the Green Belt constructed without planning permission. Green Belt should be protected.	As above. Planning permission will only be granted in the Green Belt where very special circumstances are demonstrated	None
3.	Wrong to reference site as brownfield condition requiring the land to be reinstated to its original condition.	The site has a temporary consent and is classified as brownfield	None
4.	Site has a history of temporary planning permissions - Planning Inspector stated significant concerns with this site. Temporary permission granted on the basis of allowing new sites to come forwards through the Local Plan.	The family has been established on site for a number of years, they have substantial links with the community. The Council considers it unnecessary to relocate the family to a new site	None
5.	Site passed Stage 1 despite being immediately adjacent to the M1 motorway.	Residents are satisfied with noise level. Any additional mitigation would be considered should planning permission be sought	None
6.	Other less constrained sites (e.g. Site 17, 18, 23 etc) were discounted.	This site is an existing site with long established residence	None
7.	Site is remote from local facilities and services - dependence on private car.	This site is an existing site with long established residence	None
8.	The current occupant requests that the number of pitches allocated be increased from 4 to 6 to accommodate family expansion.	The site is currently allocated for 4 pitches. The Council may wish to extend the allocation to 6 pitches in light of the substantial need for pitches identified in the GTAA 2014.	The Committee may wish to consider increasing allocation from 4 pitches to 6 pitches.

Section 8: Travelling Showpeople Site Allocations

Policy GT17: Kennel Farm Holding, Biggleswade (known as Site 82 in the Site Assessment)

	Issue	Response	
1.	The site should be allocated, it will ease overcrowding and congestion on the existing Travelling Showpeople site at Mill Lane.	Agree	None
2.	The allocation is supported by Biggleswade Town Council.	Noted	None
3.	Lack of safe passage to Biggleswade – no pathway or street lighting.	Access is considered through the submission of an application for planning permission	None
4.	Concern about the impact of large lorries on the beauty of the landscape	Necessary mitigation in relation to visual impact will be considered at planning application stage	None
5.	Dunton lane is unsafe and site is located on a bend. Showpeople’s HGVs will be crossing a heavily used pedestrian foot. Concern about access off Dunton Lane.	Satisfactory and safe vehicular access to and from the public highway is required under Policy GT6 of the Plan which planning applications for Travelling Showperson sites will be considered against	None
6.	Harm to views from Scheduled Ancient Monument. English Heritage state they do not believe that it is possible to provide appropriate mitigation for this site and that the wording in the draft policy gives the wrong impression that such mitigation might be possible.	Whilst it is accepted that the development of a Travelling Showperson site will have a negative impact on the setting of the Scheduled Ancient Monument, this issue alone is not sufficient to discount the site. Furthermore, a Planning Inspector found the extension of the Stratton Business Park (to the south of Dunton Lane) to be sound despite objections from English Heritage regarding the impact on Stratton Moat.	None
7.	Community and social facilities and services are not within easy reach. The Council is failing in its duty towards older people as services cannot be easily accessed from the site	There is reasonable access to services and the proposed residents of the site are content with the site location.	None
8.	Disproportionate number of sites in East Bedfordshire and too close to the proposed site	Policy GT11 is recommended as a Gypsy site whereas Kennel Farm is proposed for Travelling	None

	55 (Policy GT11).	Showpeople	
9.	There was no consultation undertaken on the Sustainability Appraisal and the Strategic Environmental Assessment	These documents were published alongside the Plan for consultation in line with the Town and Country Planning (Local Planning) (England) Regulations 2012	None
10.	Failure to consult with environmental protection and conservation agencies; English Heritage, Environment Agency.	All statutory consultees were consulted during the formal consultation process in line with the Town and Country Planning (Local Planning) (England) Regulations 2012	None
11.	Preference should be for development on brownfield sites.	The Site Assessment included a preference for development on brownfield sites	None
12.	Concern it could dominate existing residential properties.	The site is not considered to dominate the nearest settled community of Biggleswade	None
13.	Harm to wildlife, badger and Great Crested Newts on site	There is no indication of protected species on the site. However a full ecological survey is required prior to development	None
14.	Site should have been discounted as it had the same constraints as Site 49 which was discounted at Stage 2	This cumulative impact upon the Scheduled Ancient Monument of allocating Site 82 and Site 49 would be significantly greater than allocating site 55 .	None
15.	The Council has not complied with the Duty to Cooperate	The Council has complied fully with the Duty to Cooperate. For details see the Consultation Statement	None (See Consultation Statement)
16.	Too much pressure on local services, school oversubscribed	The Council has a duty to provide school places for all residents within Central Bedfordshire. Should a need for additional school places arrive this will be addressed	None
17.	The Showpeople already have 2 sites in Biggleswade in Sun Street, which they have chosen to develop, and Mill Lane, Biggleswade.	The development at Kennel Farm is designed to specifically mitigate the overcrowding at the current Mill Lane site.	None

Section 9: Monitoring

	Issue	Response	Change Required
1.	It would be useful for the Council to describe how it intends working regionally and with neighbouring local authorities in order to properly assess need and manage demand.	Neighbouring local authorities were invited to take part in the GTAA 2014. Under the duty to cooperate, all neighbouring authorities would be invited to take part in any subsequent accommodation assessments	None
2.	It would be useful to include current and projected legitimate waiting list figures within the overall continuous needs assessment.	Waiting list numbers were considered in the GTAA 2014 any further monitoring of accommodation need will continue to utilise the information from the waiting lists	None

Appendix 1: Glossary

	Issue	Response	Change Required
1.	Difference between Gypsies, Travellers and Travelling Showpeople is unclear	Add definition of Gypsies and Travellers, and Travelling Showpeople from PPTS to the glossary	<p>Add definition from PPTS to the glossary: “gypsies and travellers” means: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.</p> <p>“travelling showpeople” means: Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. □</p>

Appendix 2: Allocation Maps

	Issue	Response	Change Required
1.	Allocation maps reference site numbers from the Site Assessment document rather than policy numbers from the Plan. Site names are not consistent throughout the Plan	Amend maps	Amend titles of maps to include the policy number to which they refer and ensure site name is listed exactly as it appears in the Local Plan policy
2.	The land allocated for the four new Gypsy sites is insufficient to accommodate the required circulation space	The land allocated for new sites should be increased to allow approximately 7,500 square meters for a 10 pitch site.	Increase allocation to enable high quality site design

Gypsy and Traveller Local Plan

Site Assessment
(May 2013)

Gypsy and Traveller Local Plan: Site Assessment (May 2013)

1. Stage 1 Assessment	Error!
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1. Central Bedfordshire Council Gypsy and Traveller Local Plan Site Assessment: Sites Failed at Stage 1

The site assessment process was endorsed by the Sustainable Communities Overview and Scrutiny Committee on the 10th April 2012. Stage 1 of the assessment assessed sites for their immediate suitability. If a site failed one or more of the following criteria it was dismissed from the process. (The ownership of sites was also confirmed by Land Registry)

1.1	Located in a Site of Special Scientific Interest or Area of Outstanding Natural Beauty
1.2	Located in Flood Risk Zone 3
1.3	Located in or adjacent to an unsafe environment or hazardous place.

The following sites failed at Stage 1 and were removed from the assessment process.

Site Ref: Site 3					
Site Address	Land S of Bedford Rd, W of Moggerhanger				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 8					
Site Address	Land S of M1/A421				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the council– No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 9					
Site Address	Land N of Sandy Lane, S of Heath and Reach				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	This is the site of a school				
Conclusion	FAIL				
Site Ref: Site 12					
Site Address	Land N of Dunstable Rd, S of Dunstable				
Stage 1					
AONB	Yes	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 14					
Site Address	Land N of Westoning Rd and W of the Railway				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment	Part of site is currently used as allotment, adjacent to a railway line				

or hazardous place					
Conclusion	FAIL				
Site Ref: Site 17					
Site Address	Land W of A6, N of Faldo Rd and NW of Barton-le-Clay				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood Zone runs through site
On or adjacent to unsafe environment or hazardous place	Adjacent to the dual A6				
Conclusion	FAIL				
Site Ref: Site18					
Site Address	Land S of Flitwick Rd and E of Steppingley				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	electricity pylon				
Conclusion	FAIL				
Site Ref: Site 23					
Site Address	Land E of A507 and W of Etonbury MS				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood Zone runs through site
On or adjacent to unsafe environment or hazardous place	Adjacent to the A507				
Conclusion	FAIL				
Site Ref: Site 24					
Site Address	Land W of A1M and N of Radwell				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood Zone runs through site
On or adjacent to unsafe environment or hazardous place	Adjacent to the A1 in the East and A507 in the North				
Conclusion	FAIL				
Site Ref: Site 27					
Site Address	Land at How End and E of B530				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 29					
Site Address	Land at Dunedin, E of Harlington Rd and N of M1				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Electricity pylon on site. Near junction 12 of the M1				

Conclusion	FAIL				
Site Ref: Site 32					
Site Address	Land N of A507 and S+E of New Rd				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Western part in flood zone 3
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 41					
Site Address	Land N of Bartford Rd and S of Great River Ouse				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Completely in flood zone
On or adjacent to unsafe environment or hazardous place	2 electricity pylons are in the site				
Conclusion	FAIL				
Site Ref: Site 42					
Site Address	Land W of Blunham Rd and W of Moggerhanger				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the Council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 43					
Site Address	Land E of Blunham Rd and S of Charlton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site Sold by the Council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 47					
Site Address	Land S of B658 and W of Beeston				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Majority of site is in flood zone 3
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 48					
Site Address	Land S of Sandy and E of Beeston				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Fully in Flood Zone 3
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 53					

Site Address	Land E of Park Corner Farm and N of Dunton Lane				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Electricity pylon on site				
Conclusion	FAIL				
Site Ref: Site 57					
Site Address	Land E of Potton Rd and N of the existing Gypsy site in Potton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Active quarry				
Conclusion	FAIL				
Site Ref: Site 59					
Site Address	Land N of Myers Rd and S of the existing Gypsy site in Potton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Community safety issues				
Conclusion	FAIL				
Site Ref: Site 65					
Site Address	Land at Sutton Storage Compound				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site Sold by the Council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 66a					
Site Address	Land E of Sutton Rd and W of Dunton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to sewage works				
Conclusion	FAIL				
Site Ref: Site 67					
Site Address	Land E of A1 and S of Stratton Business Park				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No access to site and is next to Stratton Business Park				
Conclusion	FAIL				
Site Ref: Site 68					
Site Address	Land W of A1 and S of Beauford Farm				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to	Adjacent to the A1 and no access to site				

unsafe environment or hazardous place					
Conclusion	FAIL				
Site Ref: Site 69					
Site Address	Land of the proposed Stotfold Leisure Centre, N of Arlesey Rd				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site is on the proposed Stotfold Leisure Centre, Stotfold Football Club and football pitches				
Conclusion	FAIL				
Site Ref: Site 71					
Site Address	Land W of Wrayfields and S of Malthouse Lane				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Over half of the site is within flood zone 3
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: 77					
Site Address	Land at Old Orchard, Greenfield, W of Greenfield Rd				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Private site not re-submitted				
Conclusion	FAIL				
Site Ref: Site 84					
Site Address	Land S of Stotfold Rd and N/E of Chase Farm, Arlesey				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Part of the north east boarder is in flood zone 3
On or adjacent to unsafe environment or hazardous place	Site is in the proposed East of Arlesey extension				
Conclusion	FAIL				
Site Ref: Site 85					
Site Address	Land E of Henlow and N of the A507				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Private site not re-submitted				
Conclusion	FAIL				
Site Ref: Site 86					
Site Address	Land E of Limbersey Lane and N of Maulden				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the council – No longer in CBC ownership				

Conclusion	FAIL				
Site Ref: Site 87					
Site Address	Land E of Moor Lane and S of Maulden				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site sold by the council– No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 88					
Site Address	Land W of Henlow and N of Clifton Rd				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	East and north of the site is in flood zone 3
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 89					
Site Address	Top Farm, E of Shefford Rd, Beadlow				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Fully in flood zone
On or adjacent to unsafe environment or hazardous place	Private employment site not resubmitted				
Conclusion	FAIL				
Site Ref: Site 90					
Site Address	Motor Salvage, W of Langford Rd and S of Bigglewade				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Fully in flood zone
On or adjacent to unsafe environment or hazardous place	Adjacent to Jordans Factory				
Conclusion	FAIL				
Site Ref: Site 91					
Site Address	Former Sewage Works, Land W of Astwick				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Site not owned by the council – No longer in CBC ownership				
Conclusion	FAIL				
Site Ref: Site 94					
Site Address	High St junction land S of Lodge Rd. Cranfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent Cranfield Airfield. The site is Cranfield Millennium Park				
Conclusion	FAIL				
Site Ref: Site 95					
Site Address	Beancroft Rd Land, N of Charity Farm. Nr Marston M				

Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Condition on land precluding development other than for woodland/forestry				
Conclusion	FAIL				
Site Ref: Site 97					
Site Address	Lidlington Pit, E of Marston Rd. Lidlington				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Large body of water on site				
Conclusion	FAIL				
Site Ref: Site 100					
Site Address	Flitton Glebe, Holding, Greenfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Fully in the flood zone
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	FAIL				
Site Ref: Site 101					
Site Address	Land N Gardner's Farm, Greenfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	The site is an active allotment for the settlement				
Conclusion	FAIL				
Site Ref: Site 103					
Site Address	Land E of A6001, Hitchin Rd and opposite Henlow Camp				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Community safety issues				
Conclusion	FAIL				
Site Ref: Site 104					
Site Address	Land N Chambers Way, Biggleswade				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Part of site is in flood zone 3
On or adjacent to unsafe environment or hazardous place	Site is in the East of Biggleswade extension, primary use for a relief road				
Conclusion	FAIL				
Site Ref: Site 110					
Site Address					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Southern part flood zone 3

On or adjacent to unsafe environment or hazardous place	Site not available for development				
Conclusion	FAIL				
Site Ref: Site 111					
Site Address	Land at Girtford, W of the A1 and Sandy				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Fully in
On or adjacent to unsafe environment or hazardous place	Adjacent to sewage works				
Conclusion	FAIL				
Site Ref: Site 115					
Site Address	Oak Tree Nursery and Magpie Farm, S of Upper Caldecote				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	This site was allocated in the abandoned North DPD it has subsequently gained planning permission and has therefore been removed from this process				
Conclusion	N/A (Permission Granted)				
Site Ref: Site 117					
Site Address	Land rear of 197 Hitchin Rd and S of Arlesey				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	This site was allocated in the abandoned North DPD it has subsequently gained planning permission and has therefore been removed from this process				
Conclusion	N/A (Permission Granted)				
Site Ref: Site 120					
Site Address	Thorn Turn, Houghton Regis Sewage Works				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood zone 3 runs through the middle of the site
On or adjacent to unsafe environment or hazardous place	Sewage works adjacent and there is a firing range in the site				
Conclusion	FAIL				

2. Central Bedfordshire Council Gypsy and Traveller Local Plan Site Assessment: Sites Failed at Stage 2

All sites that passed Stage 1 of the assessment process went on to be assessed against the following criteria:

2.1	Located in Flood Zone 2- Sustainable drainage techniques can overcome any concerns
2.2	Located in the Green Belt- are there very special circumstances to warrant further consideration of the site?
2.3	Safe access from the public highway- Is there any highways works that can be done to provide safe access?
2.4	Visual and acoustic privacy and visual amenity- Can landscaping and planting provide visual and acoustic amenity?
2.5	Located on contaminated land- Can the land be remediated?
2.6	Consideration of potential impact on areas of archaeological significance- Is there any mitigation that can be undertaken?
2.7	Sites located in areas of protected wildlife should be avoided or where appropriate assessed by wildlife survey- are there any protected species on site which therefore stops development of the land?
2.8	Consideration of potential impact on landscape and nature designations, including Green Infrastructure, Village Greens and Common Land- will the site have a detrimental impact?
2.9	The proximity to other allocations in the Waste Core Strategy, the Site Allocations DPD and the Joint Core Strategy for South Beds and Luton (now superseded by Development Strategy for Central Bedfordshire)
2.10	Incline of the Site- is the site too steep therefore making development difficult?
2.11	Located adjacent to the motorway- does the impact of noise or pollution generated from the motorway make the site undevelopable?

The following sites had issues that could not be reasonably mitigated and therefore they have been removed from the assessment process:

Site Ref: Site 6					
Site Address	Land in-between A421 and Woburn Rd junction and SW of Marston Moretaine				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required prior to development	
Visual and acoustic privacy and visual amenity	Noise from neighbouring land uses, road will need detailed consideration. Site may be viable after assessment and appropriate mitigation. Visual amenity issues considered under landscape assessment			A full noise assessment would be required prior to development	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although has potential.			Mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	There is a Road Verge Nature Reserve to the east. It is a wooded site unsuitable for development There are also records of Great Crested Newt and badger in the area			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Impact on landscape	Significant negative impact on Forest of Marston Vale and habitat			Suitable mitigation is unlikely to be found therefore this site is unsuitable for allocation	
Proximity to other allocations	No impact from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No			None required	
Conclusion	FAIL: on landscape and ecological grounds.				

Site Ref: Site 6a					
Site Address	Land West of A421 and South West of Marston Moretaine				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required prior to development	
Visual and acoustic privacy and visual amenity	Noise from neighbouring land uses, road will need detailed consideration. Site may be viable after assessment and appropriate mitigation. Visual amenity issues considered under landscape assessment			A full noise assessment would be required prior to development	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although has potential.			Mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	There is a Road Verge Nature Reserve to the east. It is a wooded site unsuitable for development There are also records of Great Crested Newt and badger in the area			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Impact on landscape	Significant negative impact on Forest of Marston Vale and habitat			Suitable mitigation is unlikely to be found therefore this site is unsuitable for allocation	
Proximity to other allocations	No impact from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No			None required	
Conclusion	FAIL: on landscape and ecological grounds.				

Site Ref: Site 7					
Site Address	Land either side of Cranfield Rd, SW of Cranfield Airfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	Further assessment required	Further assessment required prior to development			
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment	None required			
Located on contaminated land	No	None required			
Archaeological significance	The site does not contain any known archaeological remains although it does have potential.	Mitigation requirements would be dependent on the specific of the development.			
Area of protected wildlife	There may be Great Crested Newt, and badgers in the area	A full ecological assessment would be required prior to development			
Impact on landscape	This site has been planted with trees Structural landscaping for business link road, elevated natural site - no fence or bunds. Impact on wooded area within Forest of Marston Vale	This is a newly planted site, it is therefore inappropriate for development			
Proximity to other allocations	No impact from other allocations	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	FAIL: on landscape grounds				

Site Ref: Site 10					
Site Address	Land N of Shenley Hill Rd, W of Leighton Buzzard Railway				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent a phone mast to the south and there is Household Waste Recycling Centre to the East of the site.				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Noise from Household Waste Site would likely preclude development. Visual amenity issues considered under landscape assessment			A full noise assessment would be required prior to development. However, it may not be possible to mitigate the impact of noise therefore this site is likely to be unsuitable for development	
Located on contaminated land	Site may be contaminated			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The eastern part of this site was part of a sand quarry in the 20th century and archaeological remains are unlikely to survive in the quarried areas. Although the unquarried part of the site does not contain any known archaeology it does have potential.			Mitigation requirements would depend on the specifics of the development.	

Area of protected wildlife	The site is adjacent to a County Wildlife Site and there may be badgers in the area	A full ecological assessment is required prior to development
Impact on landscape	Plantation, part of Green Infrastructure within urban fringe;	Prevent where possible the loss of trees and add new planting to integrate site
Proximity to other allocations	to the North of proposed East of Leighton Linlade development and in the proposed North of Leighton Linlade site	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No. However, odour from Household Waste Recycling Centre may preclude development	Further assessment required. However, it is unlikely that effective mitigation could be sought. Therefore this site is likely to be inappropriate for development
Conclusion	FAIL on acoustic privacy/ amenity and odour ground	

Site Ref: Site 11					
Site Address	Land W of A5120 and W of Houghton Regis				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer		Mitigation		
Located in Flood Zone 2	No		None required		
Located in Green Belt	Yes		PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.		
Safe access from the public highway	Further assessment required		Further assessment required		
Visual and acoustic privacy and visual amenity	Further assessment required. Visual amenity issues considered under landscape assessment		Further assessment required		
Located on contaminated land	majority of the site may be contaminated		A full Contaminated Land Study would be required prior to development		
Archaeological significance	The bulk of this site has been subject to quarrying in the first half of the 20th century and earlier and subsequent waste tipping, archaeological remains are unlikely to survive in the quarried area. However the access route into the site from the north east crosses part of the medieval settlement of Bidwell (HER 16987) and the site of some undated earthworks (HER 10653), therefore, there is the potential for archaeological		This does not prevent development but mitigation is may be required.		

	remains to exist in part of the site.	
Area of protected wildlife	Site is currently wooded, there may be Great Crested Newts and badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	This is the Blue Waters Amenity Site and part of Green Infrastructure and amenity for Bidwell.	This cannot be effectively mitigated. Therefore, this site is unsuitable for development.
Proximity to other allocations	in proposed North Houghton Regis Urban extension area	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on landscape grounds: this site is the Blue Waters Amenity Site and is therefore unsuitable for development	

Site Ref: Site 19					
Site Address	Land N of A507, W of Flitwick Rd and SE of Ampthill				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to Ampthill Household Waste Recycling Centre.				
Conclusion	PASS- locate site away from recycling centre				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	part of southern tip by the roundabout is in flood zone 2			Amend parameters of site to avoid FZ2	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Noise from Main Roads, Odour / Noise from Local Refuse Site, Noise / Light from Football Club odour from main sewage works may constrain site. Visual amenity issues considered under landscape assessment			Appropriate assessments may indicate given scale of size of sites that areas are developable. Further assessment required	
Located on contaminated land	whole of western part of site may be contaminated			A full contaminated Land Survey would be required prior to development	
Archaeological significance	The site does not contain any known archaeology; however, it is on the north western edge of an extensive Iron Age and Roman site (HER 918). In the Roman period this site is high status with substantial evidence for religious or ritual activity. The full extent of this site has not been defined and it likely to extend north westwards,			The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and will likely preclude development. Therefore this site is unsuitable for allocation.	

	therefore, this site has high potential to contain archaeological remains, this does not preclude development but mitigation is likely to be required. The site is also located within the setting of Ruxox Farm medieval moated grange (HER 919) which is a Scheduled Monument (SM 20405) and a nationally designated heritage asset.	
Area of protected wildlife	This is not an area of ecological significance. However there may be water vole, common lizard and badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	There is concern regarding urban fringe influence	Screening and planting required to integrate site
Proximity to other allocations	Bordering HA4 Warren Farm planned development	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on archeological grounds	

Site Ref: Site 21					
Site Address	Land East of Silsoe Road and South East of Maulden				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	No Objection - No justifiable highway safety reason why this site should not be considered. Site has two possible access points. Silsoe Road - there is quite a long highway frontage where it would be feasible to provide an access having appropriate visibility. Clophill Road via Redhills Close - access could be taken from a spur constructed as part of this relatively recent estate road.			None required	
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it does have potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance. However, there may be slow worm, common lizard and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is significant concern regarding the impact on tree features and integration on large open site - difficult to screen: bunding not appropriate			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on landscape grounds				

Site Ref: Site 22					
Site Address	Land West of Hitchin Road and North of Eliot Way, Fairfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	no objection to vehicle access off Hitchin Road at mid-point along the straight section of the road			None required	
Visual and acoustic privacy and visual amenity	Area of site adjacent to A507 may be subjected to excessive levels of road traffic noise but this can probably be overcome by creating a buffer zone and noise barrier. Site may be affected by proposed redevelopment of Pig Development Unit to east for mixed industrial uses generating noise/Light/fumes/dust. Visual amenity issues considered under landscape assessment			A full noise impact assessment would be required prior to development	
Located on contaminated land	The site may be contaminated			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The site does not contain any known archaeological remains although it does have potential; in particular there is evidence of later prehistoric and Roman occupation in the surrounding area.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance and there are no species records			None required	
Impact on landscape	Relation to Fairfield Park and Arlesey growth area, large open site			Scope to screen with woodland -but keep key views to landmark building	
Proximity to other allocations	This site is adjacent to the recent Fairfield Park development and is no longer promoted for development			This cannot be effectively mitigated and therefore this site is unsuitable for development as a Gypsy and Traveller site	
Incline of site	No significant incline			None required	
Located adjacent to	No air quality issues			None required	

the motorway		
Conclusion	FAIL: site no longer promoted for development	

Site Ref: Site 25					
Site Address	Land N of Edworth Rd and W of A1				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to the A1 and Water Tower				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	objection - there is concern that the site and its vehicle access will be in very close proximity with the A1 - the proposed use will result in an increase in traffic generation which could exacerbate existing conditions at the j/w the A1 - there have been 8 recorded accidents with 1 fatal and 1 serious injury within 500m of the junction.			This may not be able to be mitigated therefore this site may be unsuitable for development	
Visual and acoustic privacy and visual amenity	Noise from A1 road to east and Wind Farm to north west highly likely to result in unacceptable noise levels which cannot be mitigated to meet the council's noise standards. Visual amenity issues considered under landscape assessment			No effective mitigation for this issue therefore this site is unsuitable for development	
Located on contaminated land	water tower adjacent to site may be contaminated			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The site includes part of an Iron Age settlement (HER 524) and a coaxial field system (HER 3545) likely to be Bronze Age in origin but continuing in use in to the Iron Age, there is also evidence for contemporary settlement activity within the field system. The site is known to contain important archaeological remains, this would not prevent development.			Mitigation of the impact of any development on archaeological remains would certainly be required.	
Area of protected wildlife	This site is not an area of archaeological significance and there are no species records for this site			None required	
Impact on landscape	Water Tower is a valued landmark .High impact as			The Water Tower is a locally valued landmark;	

	elevated site large open site; traffic noise; bunds or fencing inappropriate.	therefore it is unlikely that sufficient mitigation could be put in place to overcome the impact to the landscape.
Proximity to other allocations	Adjacent to proposed windfarm	See acoustic amenity issues
Incline of site	No significant incline	None required
Located adjacent to the motorway	May have air quality issues. Further assessment required.	Further assessment required
Conclusion	FAIL: on noise impact and landscape grounds. The site is too close to the A1, the new wind turbines and the adjacent Water Tower is a valued landmark.	

Site Ref: Site 30					
Site Address	Land S of Ampthill Industrial Estate and W of A507				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to Ampthill business park				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	There is no suitable access to the site			This issue cannot be effectively mitigated therefore, this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	Noise from industrial estate and road likely to make site unsuitable. Visual amenity issues considered under landscape assessment			Suitable mitigation is unlikely to be found, therefore this site is likely to be unsuitable for development	
Located on contaminated land	whole of site is likely to be contaminated			A full Contaminated Land Survey should be undertaken prior to development	
Archaeological significance	The site does not contain any known archaeology, however, it is immediately west of an area known to contain extensive remains of Roman cultivation (HER 18271. The full extent of this site has not been defined and it likely to extend westwards, therefore, this site has high potential to contain archaeological remains, this does not preclude development but mitigation is likely to be required.			Mitigation would be dependent on the specific development	
Area of protected wildlife	This is not an area of ecological significance. However, there may be Common lizard in the area.			A full ecological survey is required prior to development	
Impact on landscape	Industrial not residential context concern regarding urbanization and loss of tree feature			Avoid removal of trees and add additional planting to integrate site	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: No access to the site and noise issues				

Site Ref: Site 31					
Site Address	Land E of Flitton Hill, S of Ampthill Rd and NE of Flitton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	northern tip is in flood zone 2			The developable part of the site is prone to flooding and waterlogging there are also soil erosion issues. This cannot be effectively mitigated therefore this site is unsuitable for development	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Noise from Road - scale of site will allow mitigation following assessment Visual amenity issues considered under landscape assessment			A full noise assessment would be required prior to development	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it may have potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance. However, there may be slow worm and badger in the area			A full ecological assessment would have to be conducted prior to development	
Impact on landscape	Very large rural site, open, elevated; no scope for bunds or fences. Concern regarding urbanization and loss of tree feature			Loss of tree feature difficult to mitigate, additional planting and screening required to integrate site	
Proximity to other allocations	No			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: Northern tip is in flood zone. Also prone to waterlogging and soil erosion				

Site Ref: Site 34					
Site Address	Land North of Church End Road and South West of Haynes				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Northern boarder
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS- amend parameters to avoid Flood Zone				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Northern part of site			Amend parameters to avoid FZ	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required				
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it may have potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	<p>The site lies outside the village / settlement envelope, located within an open subtle valley with clear views across arable fields to and from gently undulating ridgelines. Strong sense of rural remoteness, tranquillity, opens views.</p> <p>Development of the site will be highly apparent visually, overlooked, and have a highly detrimental impact on local landscape character.</p>			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on landscape grounds. Site is too exposed.				

Site Ref: Site 35					
Site Address	Land E of A6 and South of A507, Clophill				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood zone 3 along northern part of site
On or adjacent to unsafe environment or hazardous place	Adjacent to A6				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Northern part of the site is in Flood Zone 2			Amend parameters to avoid flood zone	
Located in Green Belt	No			None required	
Safe access from the public highway	objection - there is concern that the site and its vehicle access will be in very close proximity with the A6 - the proposed use will result in an increase in traffic generation at this junction and there is potential for traffic to queue to enter site and due to its proximity could impact on the flow of traffic along the A6			This cannot be adequately mitigated therefore this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	Noise from A6 and A507 will likely preclude development. Visual amenity issues considered under landscape assessment			A full noise assessment would be required to confirm that noise levels cannot be mitigated	
Located on contaminated land	All of the site may be contaminated			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The site does not contain any known archaeological remains although it may have potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	The site is adjacent to a County Wildlife Site and there may be badger in the area			A full ecological survey would be required prior to development	
Impact on landscape	concern thinning of trees, open visibility, risk to site and adjacent woodland				
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on highway safety grounds and likely noise impact				

Site Ref: Site 37					
Site Address	Land North of Northwood End Road and East of Haynes				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	No objection to vehicle access off Northwood End Road. Visual amenity issues considered under landscape assessment			None required	
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment.			None required	
Located on contaminated land	No			None required	
Archaeological significance	Part of this site lies within the area of the medieval settlement of Bidwell (HER 16987) it also contains an enclosure known from cropmarks (HER 16708) that is likely to be later prehistoric or Roman in date. Therefore, there is potential for archaeological remains to survive within the site.			This does not prevent development but mitigation may be required depending on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be badger and hare in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is significant concern regarding impact on open landscape with no boundary features. Risk to tree belt.			The openness of the site would make effective mitigation very difficult. Therefore this site is inappropriate for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on landscape grounds				

Site Ref: Site 37a					
Site Address	Land S of High Road and E of Haynes				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	No objection to vehicle access off High Road mid-point along its frontage			Take access from High Road mid-point along its frontage	
Visual and acoustic privacy and visual amenity	Careful location within the allocated site will be required in order to mitigate road traffic noise. Visual amenity issues considered under landscape assessment			Careful location within the allocated site will be required in order to mitigate road traffic noise.	
Located on contaminated land	No			None required	
Archaeological significance	The site contains a large cropmark enclosure (HER 10155) likely to be of later prehistoric or Roman date, there are other similar sites in the immediate vicinity. Therefore, there is potential for archaeological remains to survive within the site. This does not prevent development but mitigation may be required depending on the specifics of the development.			Mitigation is dependent on the specifics of the development.	
Area of protected wildlife	The site is adjacent to a County Wildlife Site and there may be badger and hare in the area			Locate away from the CWS and a full ecological survey would be required before development could commence	
Impact on landscape	Concern relating to spread of development at Deadman's Cross. Severe negative impact on woodland. Open agricultural land, Greensand; difficult to bund or fence without urban fringe influence			The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to	No air quality issues			None required	

the motorway		
Conclusion	FAIL: on landscape grounds: The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	

Site Ref: Site 38					
Site Address	Land E of Moggerhanger Park and W of St.John's Rd				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required				
Visual and acoustic privacy and visual amenity	None. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	<p>Inappropriate site. It is wholly within Moggerhanger Park (HER 6994), a Registered Park and designated heritage asset. The Park forms the setting of Moggerhanger House (HER 1094) a Grade I Listed Building and another heritage asset of the highest significance. Development within this site would result in substantial harm to the fabric and setting of the Registered Park and to the setting of the Listed Building. On this basis the site should not be allocated. It also contains a group of enclosures known from cropmarks and likely to represent later prehistoric or Roman settlement (HER 15092).</p>			<p>This cannot be effectively mitigated. This site is inappropriate for development</p>	
Area of protected wildlife	Adjacent to County Wildlife Site and there may be badger and hare			A full ecological survey would be required prior to development	
Impact on landscape	This site is within an existing Historical Park			This cannot be effectively mitigated. This site is inappropriate for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	

Conclusion	FAIL: this site is unsuitable for development because it is the site of an existing Historical Park
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Site Ref: Site 39					
Site Address	Land W of Moggerhanger Park and E of Bottom Wood				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required				
Visual and acoustic privacy and visual amenity	None. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	Inappropriate site. It is wholly within Moggerhanger Park (HER 6994), a Registered Park and designated heritage asset. The Park forms the setting of Moggerhanger House (HER 1094) a Grade I Listed Building and another heritage asset of the highest significance. Development within this site would result in substantial harm to the fabric and setting of the Registered Park and to the setting of the Listed Building. On this basis the site should not be allocated.			This issue cannot be effectively mitigated therefore this site is unsuitable for development.	
Area of protected wildlife	The site is adjacent to a County Wildlife Site and may contain badger			A full ecological survey would be required prior to development	
Impact on landscape	This site is within an existing Historical Park and impact on Greensand landscape			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on archaeological and landscape grounds: This site is within an existing Historical Park and is therefore unsuitable for development				

Site Ref: Site 40					
Site Address	Land east and south of Barford Road and south east of Great Barford				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Electricity pylon adjacent site				
Conclusion	PASS – development would have to be away from electricity pylons				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	The Western edge of the site is in the Flood Zone 2			Amend parameters of site to avoid FZ	
Located in Green Belt	No			None required	
Safe access from the public highway	no objection to vehicle access off Barford Road (North-South)			None required	
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it does have potential with a number of cropmarks known from the immediate vicinity which are likely to represent prehistoric or Roman settlement. The site is also located within the setting of Barford Bridge and causeway (HER 996) which is a Scheduled Monument (SM BD 25) and a nationally designated heritage asset.			The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development.	
Area of protected wildlife	This is not an ecologically significant site. However there may be otter in the area			A full ecological assessment would have to be conducted prior to development	
Impact on landscape	This site is wholly inappropriate- it is a critical part of the river valley landscape and needs to remain undeveloped in order to continue to contribute to the riverside setting. This is valuable agricultural land in arable production and forms part of the rural gap between the village of Blunham, which is expanding on its western boundary, and Great Barford.			This is not a suitable site for development in view of the landscape impact and that typical mitigation treatments would neither be effective or appropriate.	

Proximity to other allocations	This site is not within the vicinity of other site allocations	None required
Incline of site	This site is on a slight incline	Development should be on flattest part of the site
Located adjacent to the motorway	No	None required
Conclusion	FAIL: on landscape grounds.	

Site Ref: Site 44					
Site Address	Land North of A603 and East of Moggerhanger				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required.			Further assessment required.	
Visual and acoustic privacy and visual amenity	None. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it may have potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance however there may be hare and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	Conflict with entrance to village, risk to recreational land and Greensand landscape			This issue cannot be effectively mitigated	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: Failed on landscape grounds. The site is too exposed and is also too close to microlight airway.				

Site Ref: Site 45					
Site Address	Land N of A507, E of Shefford Rd and S of Shefford				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to a petrol station				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required.			Further assessment required.	
Visual and acoustic privacy and visual amenity	Noise from nearby A507. Visual amenity issues considered under landscape assessment			A full noise assessment would be required to confirm that noise levels are unsuitable for development	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it does have potential with a number of cropmarks known from the immediate vicinity which are known to represent Late Iron Age settlement.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an ecologically significant area and there are no species records			None required	
Impact on landscape	Nothing significant			Planting required to integrate site	
Proximity to other allocations	Part of future employment land option.			This cannot be effectively mitigated therefore this site is unsuitable for development	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: The site is part of a future land employment option, is too small, and suffers from unsuitable levels of noise from the A507.				

Site Ref: Site 46					
Site Address	Land N of A603 and E of The Ridgeway, N Moggerhanger				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Eastern part of site
On or adjacent to unsafe environment or hazardous place	Adjacent to an airfield				
Conclusion	PASS- amend parameters to avoid Flood Zone				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Eastern part of site			Amend parameters to avoid flood zone	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Noise from Road - scale of site will allow mitigation following assessment. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	May contain contaminated land			A full contaminated land survey would be required prior to development	
Archaeological significance	The site contains part of an area of cropmarks enclosure (HER 17125) likely to be of later prehistoric or Roman date. Therefore, there is potential for archaeological remains to survive within the site.			This does not prevent development but mitigation may be required depending on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance and there are no species records for the area			None required	
Impact on landscape	Concern regarding proximity to County Wildlife Site, concern regarding urban fringe influence. The site is also next to a microlight airway and therefore unsuitable for development			This issue cannot be mitigated effectively and therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: Fails on landscape grounds. The site is also too close to a microlight airway.				

Site Ref: Site 49					
Site Address	Land E of Saxon Drive, Saxon Pool and Leisure Centre and E of Biggleswade				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	No concerns Visual amenity issues considered under landscape assessment.			None required	
Located on contaminated land	No			None required	
Archaeological significance	<p>Inappropriate site. Located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541 and therefore a nationally designated heritage asset of the highest significance. The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site on the shortlist.</p> <p>Archaeological evaluation of this land has shown that it contains extensive remains of Roman, Saxon, medieval and post-medieval settlement, the latter relating to the deserted settlement of Stratton (HER 518).</p>			<p>Negative impact cannot be effectively mitigated. This site is inappropriate for development</p>	
Area of protected wildlife	<p>There is an amphibian pond to west, potential Great Crested Newt issues, within Biodiversity opportunity area and Biggleswade Green Wheel</p>			<p>Negative impact cannot be effectively mitigated. This site is inappropriate for development.</p>	
Impact on landscape	<p>Concern regarding spread of urban fringe, risk to woodland and allotments</p>			<p>Avoid loss of woodland, and conduct new planting and screening to mitigate impact to landscape</p>	
Proximity to other allocations	<p>No issues from other allocations</p>			<p>None required</p>	

Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on wildlife and archaeological grounds.	

Site Ref: Site 50					
Site Address	Land at Orchard Farm, E of Biggleswade				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood zone 3 along northern part of site
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS- parameters of site must be amended to avoid FZ3				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Flood Zone 2 along eastern part of site			Avoid development on FZ2	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required				
Visual and acoustic privacy and visual amenity	No acoustic privacy issues. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	Inappropriate site. Located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541 and therefore a nationally designated heritage asset of the highest significance. The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site on the shortlist.			Negative impact cannot be effectively mitigated. This site is inappropriate for development	
Area of protected wildlife	Biodiversity opportunity area and Biggleswade Green Wheel			Negative impact cannot be effectively mitigated. This site is inappropriate for development	
Impact on landscape	Concern regarding impact on existing woodland			Avoid removing existing woodland, and where necessary introduce new planting	
Proximity to other allocations	Part of Biggleswade Town Centre Masterplan area			Likely to be unsuitable for development as a Gypsy and Traveller site.	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on wildlife and archaeological grounds and proximity to other allocations.				



Site Ref: Site 51					
Site Address	Land at Park Lane Farm Holding, N of Dunton Lane				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood zone 3 along eastern part of site
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS - amend site parameters to avoid FZ3				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Flood Zone 2 on eastern part of site			Avoid development on FZ2	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Noise/odor from isolated sources such as farms may need to be evaluated but otherwise site may be suitable. Visual amenity issues considered under landscape assessment			Full noise assessment will be required prior to development	
Located on contaminated land	No			None required	
Archaeological significance	Wholly inappropriate site. It is part of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM11541) and therefore a nationally designated heritage asset of the highest significance. Development within a nationally designated heritage asset is not acceptable therefore the Archaeology Team objects to the inclusion of this site in the short list. This site must not be allocated for development.			Negative impact cannot be effectively mitigated. This site is inappropriate for development	
Area of protected wildlife	There is a County Wildlife Site to the South East of the site and there may be badger in the area			A full ecological survey would be required prior to development	
Impact on landscape	concern regarding the spread of urban influence and risk to trees and habitat nearby				
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	

Conclusion	FAIL: Fails on archaeological grounds
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Site Ref: Site 52					
Site Address	Land W of Park Corner Farm and E of Biggleswade				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	No acoustic privacy issues. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	Inappropriate site. Located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541 and therefore a nationally designated heritage asset of the highest significance. The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site on the shortlist.			This cannot be adequately mitigated, therefore this site is unsuitable for development	
Area of protected wildlife	There is a County Wildlife Site to the South West and there may be badgers and amphibians in the area			A full ecological survey would be required prior to development	
Impact on landscape	Concern regarding impact on rural road character, risk to tree belt and habitats			Appropriate screening and planting would be required to integrate site	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on archaeological grounds				

Site Ref: Site 61					
Site Address	Land South of Wrestlingworth Road, West of Wrestlingworth				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	no objection to vehicle access off Wrestlingworth Road, mid-point along its frontage			Take vehicle access off Wrestlingworth Road, mid-point along its frontage	
Visual and acoustic privacy and visual amenity	There is potential negative impact from road traffic. Careful allocation can overcome this given scale of site. Visual amenity issues considered under landscape assessment			Careful allocation can overcome this given scale of site.	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although has potential.			Mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This site has not been identified as ecologically significant. However, there may be hare and badger in the area			A full ecological survey would be required before development could commence	
Impact on landscape	There is significant concern regarding risk to plantations, creation of urban fringe impact in important gap. The site is a remote rural site, open exposed views with no built context			The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on landscape grounds: The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development				

Site Ref: Site 64					
Site Address	Land N of the High Street, Sutton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Flood Zone 3 along Western part of site
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS - site parameters must be amended to avoid FZ3				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Western part of the site is in Flood Zone 2			Develop away from the Flood Zone	
Located in Green Belt	No			None required	
Safe access from the public highway	objection to vehicle access off High Street - substandard sight lines - will require cut back of foliage over 3rd party land			This issue cannot be effectively mitigated	
Visual and acoustic privacy and visual amenity	No acoustic privacy issues. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	This site lies partially within the known limits of Sutton Park (HER 7005) and the medieval core of the settlement of Sutton (HER 17165). It is also within the setting of John O'Gaunt's Hill (HER 510) which is probably a medieval motte. It is a Scheduled Monument and therefore a heritage asset of the highest significance. There is therefore some archaeological potential at this site.			Depending on the nature of the development it is likely that an appropriate mitigation strategy can be found.	
Area of protected wildlife	This is not an area of ecological significance. However there may be badger in the area			A full ecological survey would need to be carried out prior to development	
Impact on landscape	There is risk to existing wooded features			Wooded areas should be protected. Appropriate screening would be required to mitigate impact on visual amenity	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL : on Highway safety grounds: objection to vehicle access				

off High Street - substandard sight lines - will require cut back of foliage over 3rd party land

Site Ref: Site 66					
Site Address	Land E of Sutton Rd, W of Cambridge Rd and N of Dunton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Northern edge in Flood Zone
On or adjacent to unsafe environment or hazardous place	Sewage works adjacent to part of the site. However the site is large enough to locate pitches a sufficient distance from the sewage works				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Northern tip in Flood Zone 2	Amend site parameters to avoid flood zone			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to vehicle access off Cambridge Road along the mid-point of its frontage	None required			
Visual and acoustic privacy and visual amenity	Noise / odour from isolated sources such as farms / roads and sewage works will need to be carefully evaluated but given sheer scale of site mitigation will likely be viable in all instances providing appropriate assessments are conducted. Visual amenity issues considered under landscape assessment	Further assessment required. Amend site parameters to avoid issues relating to acoustic privacy.			
Located on contaminated land	There may be sources of contamination on the site	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	This site is within the setting of Newton Bury Moat (HER 2815) which is a medieval moated residence with associated historic documentation dating it from 1504. It is a Scheduled Monument and therefore a heritage asset of the highest significance.	The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development. The Archeology Team advise against allocating this site.			
Area of protected wildlife	This site is not an area of ecological significance and there are no species records for the site.	None required			
Impact on landscape	There is scope to integrate with village requires significant plantation screening.	Significant plantation screening would be required			
Proximity to other	No	None required			

allocations		
Incline of site	No significant incline	None required
Located adjacent to the motorway	There are no concerns regarding air quality	None required
Conclusion	FAIL: On archaeological grounds. A number of the issues raised could be mitigated if the site was located to the East of the site. This area was subdivided and labelled Site 66b	

Site Ref: Site 72					
Site Address	Land at junction W of Hitchin Rd, N of the A507 and S of Stotfold				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	N
On or adjacent to unsafe environment or hazardous place	Adjacent to the A507				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	objection - no new vehicle access acceptable off a strategic road (A507) so close to a junction - possible vehicle access off Hitchin Road which is 3rd party - however due to its proximity to a strategic road junction it is not desirable			This issue cannot be effectively mitigated	
Visual and acoustic privacy and visual amenity	Further assessment required Visual amenity issues considered under landscape assessment			Further assessment required	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology and a number of investigations in the vicinity suggest this site has medium to low potential.			Mitigation may be required but it would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance and there are no species records for the area			None required	
Impact on landscape	The site would require extensive planting to screen and integrate			The site would require extensive planting to screen and integrate	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on highway safety grounds: no new vehicle access acceptable off a strategic road (A507) so close to a junction - possible vehicle access off Hitchin Road which is 3rd party - however due to its proximity to a strategic road junction it is not desirable				

Site Ref: Site 73					
Site Address	Land West of the A507 bypass and East of Arlesey				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	no objection to a vehicle access at this location on the A507 since there is an existing vehicle access - however improvements to the access will be required			improvements to the access	
Visual and acoustic privacy and visual amenity	Site is affected by road traffic noise from A507 but likely to be overcome by buffer zone and/or barrier. Will need detailed assessment. Visual amenity issues considered under landscape assessment			Conduct detailed noise assessment prior to development	
Located on contaminated land	No			None required	
Archaeological significance	Site adjacent to HER 16083 (possible Saxon occupation) and therefore has some potential.			Mitigation requirements would be dependent on the specifics of the development	
Area of protected wildlife	This is not an area of ecological significance. However there may be otter in the surrounding area			A full ecological assessment would be required prior to development	
Impact on landscape	Significant concern regarding risk to existing woodland. No context this side of A507/ conflict with growth area Green Infrastructure provision ;concern access			These issues cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: on landscape grounds				

Site Ref: Site 74					
Site Address	Land South of West Drive, West of Fairfield and East of Arlesey				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	<p>Object to development. The site suggests vehicle access from West Drive the access road to the former hospital estate now closed to through traffic half way along its length. It appears West Drive is not a highway maintainable at public expense therefore the site may not have the necessary rights of access. Assuming rights do exist or can be achieved, the route of access would be toward Arlesey. The junction of West Drive with Hitchin Road, High Street Arlesey is perfectly adequate in terms of geometry and visibility. However beyond the initial length of made up road the route deteriorates in width and construction standard that would make the route unacceptable to serve further development including the use proposed. Nevertheless if it were possible for the route to be improved by widening and/or passing bays together with foot/cycle way provision along its length Highways may reconsider the objection</p>			<p>No sufficient mitigation. This site is therefore unsuitable for development.</p>	
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	Part of the site may be contaminated			A full Contaminated Land Survey would have to be completed prior to development	
Archaeological	Site adjacent to HER 16801 (an			. Mitigation requirements	

significance	extensive area of late prehistoric occupation) and therefore has potential.	would be dependent on the specifics of the development.
Area of protected wildlife	This is not an area of ecological significance and there are no species records for this area	Non required
Impact on landscape	There is significant concern regarding the ability to integrate the site. A rural buffer would be required. The site represents important open space, development would conflict with avenue as landscape feature	The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development
Proximity to other allocations	No issues from other allocations	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on landscape grounds and highways: The impact on the landscape is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	

Site Ref: Site 79					
Site Address	Land north of West Drive, east of Arlesey				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Objection - The junction of West Drive with Hitchin Road, High Street Arlesey is perfectly adequate in terms of geometry and visibility. However, beyond the initial length of made up road the route deteriorates in width and construction standard that would make the route unacceptable to serve further development including the use proposed. Nevertheless if it were possible for the route to be improved by widening and/or passing bays together with foot/cycle way provision along its length a highway objection would not be appropriate			It is unlikely that this issue could be effectively mitigated. Therefore, this site is likely to be inappropriate for development	
Visual and acoustic privacy and visual amenity	There are no concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although has potential.			Any mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance and there are no species records in the area			None required	
Impact on landscape	This site would conflict with historic landscape and important open space.			There is insufficient mitigation to limit harm to the historic landscape. Therefore, this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	

Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on landscape and highways grounds.	

Site Ref: Site 83					
Site Address	Land W of A1M, N of A507 and E of Stotfold				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent A1. However, site could be located away from A1 with access off A507				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Objection - Despite the existence of an access constructed to serve the agricultural land affected by construction of the Stotfold Bypass there is a fundamental highway safety concern relating to the use of such accesses for development where none exists historically.			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	Eastern part of site has unacceptable levels of road traffic noise that cannot be mitigated to acceptable levels through use of noise barriers. However, western part of site may be suitable with mitigation measures. Visual amenity issues considered under landscape assessment			Western part of site may be suitable with mitigation measures.	
Located on contaminated land	No			None required	
Archaeological significance	Site contains cropmark HER 16830 and is to the north of an extensive area of multiperiod occupation (HER 13340). Therefore has medium to high archaeological potential.			Mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This site is adjacent to a County Wildlife Site and nature reserve. There may be water vole and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is significant concern as the site would detract from river valley - strategy is to enhance Ivel and transport corridors. A site would negatively impact on the important rural gap between Ivel corridor and A1			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other	No issues from other			None required	

allocations	allocations.	
Incline of site	No significant incline	None required
Located adjacent to the motorway	Eastern part of site adjacent to A1 has unacceptable levels of road traffic noise that cannot be mitigated to acceptable levels through use of noise barriers.	This issue cannot be effectively mitigated therefore this site is unsuitable for development
Conclusion	FAIL: on landscape, noise and highway safety grounds	

Site Ref: Site 93					
Site Address	Land N of Cranfield Rd, N of Leys Farm. Cranfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Further assessment required				
Visual and acoustic privacy and visual amenity	No acoustic privacy issues. Visual amenity issues considered under landscape assessment			Non required	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although it is adjacent to HER 16478 which is an enclosure of probably prehistoric date. The present land use however means there is unlikely to be any surviving archaeological remains. No constraint.			None required	
Area of protected wildlife	This is not an area of ecological significance and there are no species records for this site			None required	
Impact on landscape	Loss of wooded feature, risk to other woodland, elevated position. Site is too small for development			No mitigation. Site is unsuitable for development.	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	
Conclusion	FAIL: Landscape grounds. Plus the site is too small.				

Site Ref: Site 98					
Site Address	E Flitwick Rd Land by junction with A507. Ampthill				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Across the A507 is an electricity sub station although this may not preclude development				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	southern part of the site is in flood zone 2			Amend parameters of site to avoid FZ2	
Located in Green Belt	No			None required	
Safe access from the public highway	objection - whilst sightlines are fine, the access would create a short stagger/crossroad junction and is close to the main roundabout			This cannot be effectively mitigated therefore this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	The impact from noise from road traffic on the A507 and odor from the sewage treatment works make this site unsuitable for development. Visual amenity issues considered under landscape assessment.			This cannot be effectively mitigated therefore this site is unsuitable for development	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeology; however, it is on the north western edge of an extensive Iron Age and Roman site (HER 918). In the Roman period this site is high status with substantial evidence for religious or ritual activity. The full extent of this site has not been defined and it likely to extend north westwards, therefore, this site has high potential to contain archaeological remains, this does not preclude development but mitigation is likely to be required. The site is also located within the setting of Ruxox Farm medieval moated grange (HER 919) which is a Scheduled Monument (SM 20405) and a nationally designated heritage asset.			The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development.	
Area of protected wildlife	This is not an area of ecological significance and there are no species records for the area			None required	

Impact on landscape	There is significant concern regarding tree loss and extending urban fringe influence. Too small for quality design. Very small isolated site - subject to traffic noise, also sewage works nearby.	This cannot be effectively mitigated therefore this site is unsuitable for development
Proximity to other allocations	No issues from other allocations	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on highway safety, visual and acoustic amenity, and impact on landscape	

Site Ref: Site 99					
Site Address	Bolobec Farm, E of The Brache. Maulden				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	No objection, however the Brache junction with Ampthill Road will need to be reviewed			The Brache junction with Ampthill Road will need to be reviewed	
Visual and acoustic privacy and visual amenity	Noise and odor from isolated sources such as farms may need to be evaluated but otherwise site maybe suitable. Visual amenity issues considered under landscape assessment			Further assessment required	
Located on contaminated land	No			None required	
Archaeological significance	Inappropriate site. This site is within the setting of Bolebec medieval moated site (HER 221) which is a medieval moated residence. It is a Scheduled Monument and therefore a heritage asset of the highest significance. It also contains an area of cropmarks (HER 14745) and has produced Roman and early post medieval finds. The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development. We advise against allocating this site.			The archaeological impact is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	
Area of protected wildlife	The site is adjacent to a County Wildlife Site and there is a SSSI to the south. There may be Great Crested Newts, Midwife Toad, Adder, Dormouse, Badger and Hare			A full ecological assessment would have to be conducted prior to development	
Impact on landscape	Concern regarding risk to wooded features, landscape strategy to conserve rural quality			Planting and screening required to integrate site.	
Proximity to other	No issues from other allocations			None required	

allocations		
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on archaeological grounds: The archaeological impact is such that it could not be reasonably mitigated. Therefore this site is inappropriate for development	

Site Ref: Site 105					
Site Address	Land at Double Arches Farm and E of Heath and Reach				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Western part of site
On or adjacent to unsafe environment or hazardous place	Adjacent to active gravel pit				
Conclusion	PASS- amend parameters to avoid FZ3				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	West part of site			Amend parameters to avoid FZ2	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	This site has significant access issues and therefore is unsuitable for development			This issue cannot be adequately mitigated therefore this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	Potential of dust and noise impact from quarry and noise from road traffic network. Visual amenity issues considered under landscape assessment			A full noise impact assessment would be required prior to development	
Located on contaminated land	no			None required	
Archaeological significance	Site contains HER 14687 which represents medieval ridge and furrow cultivation remains and possible prehistoric cropmarks. Some of these features have already been impacted upon by the present land use, however below surface remains may still exist within the site boundary.			Mitigation would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an ecologically significant area. However there			A full ecological assessment would have to take place	

	may be badger in the area	prior to development
Impact on landscape	Significant concern regarding A5 access and spread of urban fringe impact. Isolated site in Greensand setting with open fields opposite	This would be difficult to effectively mitigate therefore recommend this site is not allocated
Proximity to other allocations	No issues from other allocations	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: Fails due to issues with access.	

Site Ref: Site 106					
Site Address	Land W of A5 and NW of Hockiffe				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Southern edge of site borders Flood Zone
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Borders Flood Zone 2			Amend site parameters to avoid Flood Zone	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so Only 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.	
Safe access from the public highway	No objection subject to the vehicle access being located furthest southwest of the sites frontage as possible to achieve optimum sightlines			None required	
Visual and acoustic	Noise from A5 significant factor			A full noise assessment	

privacy and visual amenity	which would need consideration. Scale of site would allow mitigation subject to detailed assessment. Visual amenity issues considered under landscape assessment	would be required prior to development
Located on contaminated land	No	None required
Archaeological significance	Inappropriate site. Located within the setting of Church Farm Moat and Settlement (HER 10), Hockcliffe which are a Scheduled Monument (SM 24414) and therefore a nationally designated heritage asset of the highest significance. In addition this site contains the earthwork remains of the medieval landscape associated with Church End, Hockcliffe (HERs 16880, 3279 and 11639)	The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site in the shortlist.
Area of protected wildlife	There is a County Wildlife Site to the south of the site and there may be badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	There is concern regarding urban fringe influence and impact on historic landscape	Planting and screening to integrate site
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	There are no concerns regarding air quality	None required
Conclusion	FAIL: on archaeological grounds	

Site Ref: Site 107					
Site Address	Land E of Fordfield Rd and S of Millbrook				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Electricity pylon on site- development must be located as far away from this as possible				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	Further assessment required			Further assessment required	
Visual and acoustic privacy and visual amenity	Further assessment required. Visual amenity issues considered under landscape assessment			Further assessment required	
Located on contaminated land	No			None required	
Archaeological significance	Site is located adjacent to an area of cropmarks (HER 15291) and includes possible mining remains (HER 6777). Therefore it has archaeological potential.			Any mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be Great Crested Newt, Common Lizard, hare and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is significant concern regarding the spread of urban fringe influence; risk to established woodland in open setting, very exposed, isolated			The negative impact on openness cannot be effectively mitigated therefore this site is unsuitable for development	

	from village.	
Proximity to other allocations	The site is adjacent to the Center Parcs development. Additional development harms the rural character.	This may not be possible to mitigate.
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: Fails due to landscape constraints.	

Site Ref: Site 108					
Site Address	Land E of Russell Grove and E of Millbrook				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	objection - whilst access to the site is via private road, the junction of the private road to the public highway i.e. Sandhill Close, sightlines here are substandard and traffic calming features are installed - any use of the site will exacerbate existing conditions at this junction particular the type of vehicles likely to be used - therefore it is not recommended. If just the Warren Farm access is to be considered, further intensification would be undesirable in a highway safety context.			This issue cannot be effectively mitigated therefore this site is inappropriate for development	
Visual and acoustic privacy and visual amenity	Noise from Rail Line will need consideration but mitigation should be possible. Visual amenity issues considered under landscape assessment			A full noise impact assessment would be required prior to development	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology, although has potential.			Any mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be hare and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	Issues regarding impact on traditional greensand landscape -parkland trees ,not part of village context			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other allocations	No issues from other allocations			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No air quality issues			None required	

Conclusion	FAIL: on highways and landscape grounds
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Site Ref: Site 109					
Site Address	Land E of Fordfield Rd and NW of Wards End and Steppingley Hospital				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	No objection			None required	
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	Site does not contain any known archaeology; however it is adjacent to a series of cropmarks as defined by HER 13968 and therefore has potential.			Any mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be hare and badger in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is significant concern regarding the spread of urban fringe influence; risk to established woodland in open setting, very exposed, isolated from village.			The negative impact on openness cannot be effectively mitigated therefore this site is unsuitable for development	
Proximity to other	No issues from other allocations			None required	

allocations		
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on landscape grounds	

Site Ref: Site 112					
Site Address	Land W of Georgetown Rd, A1 and NW of Sandy				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	Adjacent to A1				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	Small road unsuitable for large vehicles			This suggests this site would be inappropriate for development	
Visual and acoustic privacy and visual amenity	Noise from A1 road to east and Kennels to north highly likely to result in unacceptable noise levels which cannot be mitigated to meet the council's noise standards. Visual amenity issues considered under landscape assessment.			This cannot be adequately mitigated therefore this site is inappropriate for development	
Located on contaminated land	Site in general area of potentially contaminative industrial uses.			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	Site does not contain any known archaeology; however it is adjacent to a series of cropmarks as defined by HER 13968 and therefore has potential.			Any mitigation requirements would be dependent on the specifics of the development.	
Area of protected wildlife	As this site is surrounded by development there are unlikely to be any ecological issues			None required	
Impact on landscape	Concern regarding urban fringe character, need to upgrade visually			Screening and planting required	
Proximity to other allocations	No			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	site adjacent to the A1 which may be adversely affected by road traffic emissions			Further assessment required	
Conclusion	FAIL: on noise grounds- Noise from A1 road to east and Kennels to north highly likely to result in unacceptable noise levels which cannot be mitigated to meet the council's noise standards.				

Site Ref: Site 113					
Site Address	Land at Spinney Meadows, N of Stanbridge Rd and East of Billington				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	no objection - avoid creating left/right staggers or crossroads with vehicular accesses on the opposite side			avoid creating left/right staggers or crossroads with vehicular accesses on the opposite side	
Visual and acoustic privacy and visual amenity	No. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site does not contain any known archaeological remains although it may have some potential.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This is not an area of ecological significance			None required	
Impact on landscape	There is concern regarding the spread of urban fringe influence			Significant planting and screening required to integrate site	
Proximity to other allocations	Close to existing G&T sites and so balance with settled community could be out of proportion			Site is unsuitable due to proximity to existing sites in a rural location.	

Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: Fails due to proximity to other allocations	

Site Ref: Site 118					
Site Address	Hermitage Lane, E of Westoning Rd and S of Greenfield				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer				Mitigation
Located in Flood Zone 2	No				None required
Located in Green Belt	Partly in Green Belt				None required
Safe access from the public highway	Maneuvering large vehicles and caravans on a public right of way is unsuitable				This site should not be allocated
Visual and acoustic privacy and visual amenity	Further assessment required. Visual amenity issues considered under landscape assessment				Further assessment required.
Located on contaminated land	No				None required
Archaeological significance	Site does not contain any known archaeology and the existing site use means it is unlikely that any remains survive.				None required
Area of protected wildlife	This is not an area of ecological significance				None required
Impact on landscape	Concern regarding spread of urban fringe influence. Risk to trees and hedgerows.				Potential for screening
Proximity to other allocations	No issues from other allocations				None required
Incline of site	No significant incline				None required
Located adjacent to the motorway	No air quality issues				None required
Conclusion	FAIL: on highway safety grounds. This is an existing site which is tolerated as a Gypsy site has been on this site for around 45 years. Enforcement action is therefore unavailable				

Site Ref: Site 119					
Site Address	Land at Sundon Water Tower, N of Luton				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	This site appears to be only accessible from typical residential roads from within the Borough of Luton, outside CBC jurisdiction. The roads appear unsuitable to accommodate regular usage by commercial size vehicles.			This issue cannot be effectively mitigated therefore this site is unsuitable for development	
Visual and acoustic privacy and visual amenity	No concerns. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	A series of Roman artifacts have been collected from within the proposed site (HER 15868) and its southern boundary is formed by the Thiodweg (HER 10843), a late Saxon/medieval trade route that may have prehistoric origins.			This does not necessary prevent the allocation of this site. However, depending upon the nature of the development proposals some form of archaeological mitigation may be required.	
Area of protected wildlife	This is not an area of ecological significance and there are no			None required	

	species records for the area	
Impact on landscape	This lies within the north Luton growth area. At present this farmland is a valuable part of the urban fringe - the arable landscape extends into the town providing attractive views up to Sundon. The water tower is a local landmark, identified as such by the community in the Landscape Character Assessment. Most importantly, the site is on the Theed Way - an ancient drover's route. It is also a bridleway used as the Icknield Way. Space needs to be safeguarded for green infrastructure within the growth area, to ensure amenity for residents and conservation of the historic paths. The buffer landscape zone should not be compromised by development of a gypsy and traveller site. Land close to the water tower would also need to be kept open so that it remains a landmark.	This issue cannot be effectively mitigated therefore this site is unsuitable for development
Proximity to other allocations	No issues from other allocations	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No air quality issues	None required
Conclusion	FAIL: on highway safety grounds and landscape	

Site Ref: 121					
Site Address	Land off Mentmore Rd, Leighton Buzzard				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	No objection - No justifiable highway safety reason why this site should not be considered.			None required	
Visual and acoustic privacy and visual amenity	Noise from adjacent uses will need consideration. Visual amenity issues considered under landscape assessment			A full noise assessment would be required before development could commence	
Located on contaminated land	Adjacent land and possibly site subject to former use which may have given rise to contamination. This needs appropriate investigation and where necessary mitigation prior to development			A full Contaminated Land Survey would be required before development could commence	
Archaeological significance	The proposed site has an area of ridge and furrow cultivation earthworks (HER 5458) recorded within it and lie just to the north of the location of a series of Roman finds including burials (HER 10725) recorded during quarrying. Neither of these archaeological sites			Mitigation would be dependent on the specifics of the development	

	necessary precludes allocation, but depending upon the nature of the development proposals it is likely some form of mitigation will be required.	
Area of protected wildlife	This site is next to Tiddenfoot County Wildlife Site and contains semi improved grassland; the area has records of reptiles and invertebrates. From aerial photos there appear to be some trees on the site which may be of value to bats which are also well recorded in the area. Development would be an unfortunate loss of open habitat adjacent to a Country Wildlife Site.	Full ecological survey of the site would be needed prior to development to ensure mitigation measures were in place should any impacts be identified.
Impact on landscape	This is a valuable piece of open land between the Upper School and Tiddenfoot Country Park. It provides a rural edge to the town and is adjacent to the very important wildlife and recreational site of Tiddenfoot Country Park. It also lies in the corridor of the Grand Union Canal. It is quite a large site, but any development would urbanize the land to the detriment of the landscape character. The site is within the very small character area of 7B - Ouzel Greensand Valley - southern part. Guidance in the Landscape Character Assessment highlights that this area is very vulnerable to urban influence. It advises against urban extension into the valley landscape. Conservation of the recreational resource is also a high priority. It is advised that this site should not be progressed as a G&T site	Sufficient mitigation cannot be found in this instance. Therefore this site is deemed unsuitable
Proximity to other allocations	No issues from other allocations	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No issues	None required
Conclusion	FAIL: on landscape grounds	

3. Central Bedfordshire Council Gypsy and Traveller Local Plan Site Assessment: Sites Scored at Stage 3

Having passed Stage 1 and Stage 2 of the site assessment, the following sites were scored against the criteria endorsed by the Sustainable Communities Overview and Scrutiny Committee on the 10th April 2012:

3.1	Located on Brownfield or Greenfield land? – Can high grade quality agricultural land be avoided?	Brownfield (5) Greenfield (3) High Grade Agriculture (0)
3.2	Access to major roads	Good, Within 0.5-1 mile (5) Fair, within 1-2 miles (3) Poor, within 2-3 miles (1) No score, over 3 miles (0)
3.3	Access to public transport services	Good within 5 min walk (5) Fair, within 10 min walk (3) Poor, within 20 min walk (1) No score, over 20 min (0)
3.4	Access to health services (GP)	Good, within 10 min walk (5) Fair, within 20 min walk (3) Poor, within 30 min walk (1) Anything above 30 min (0)
3.5	Access to school, further education or training	Good, within 10 min walk (5) Fair, within 20 min walk (3) Poor, within 30 min walk (1) Anything above 30 min (0)
3.6	Access to community facilities	Good, within 10 min walk (5) Fair, within 20 min walk (3) Poor, within 30 min walk (1) Anything above 30 min walk (0)
3.7	Serviceable by Gas/ Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)
3.8	Provision of Waste and Recycling facilities	Yes (5) No (0)

Whilst the criteria have remained unchanged, a further refinement has been made to criterion 3.5 - 'Access to school, further education or training'. The original single criteria for schools have been subdivided into 3 separate headings (for lower, middle, upper schools). The sites were scored using the single heading and scored again using the 3 headings.

Each of the 3 headings is capable of attracting the same score that the single heading did (5, 3, 1 or 0). The use of three headings instead of one creates the potential for higher total scores as some sites will be adjacent to more than one sort of school. This approach increases the maximum possible total score that could be attracted by the criteria of 'proximity to schools'. The increase reflects the advantage offered by being close to more than one sort of school, rather than only one of the 3 sorts of schools. Therefore, a higher score for a site close to more than one sort of school is compatible with the aims of the scoring exercise. Adopting 3 school headings has provided an extra level of detail and definition. Both sets of scoring are outlined in the following site assessments.

The GTAA Update 2013 outlined Central Bedfordshire need **65 pitches** from January 2013 to December 2018 (**period 1**) to address the backlog of need and household growth. Planning policy for traveller sites states local authorities must identify **deliverable** sites to meet this need.

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. The following sites are private sites that have been put forward for Gypsy sites. Three are existing Gypsy and Traveller sites seeking authorisation of existing sites and/or expansion of existing sites.

Site Ref: Site 92					
Site Address	Land E of Watling Street and S of Dunstable				
Number of pitches proposed	This is an existing Gypsy site with permission for 6 permanent pitches. The owner seeks an extension to the site for, up to an additional 12 pitches.				
Stage 1					
AONB	Yes	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS- exceptional circumstances facilitate development in the AONB				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.			
Safe access from the public highway	No objection on highways safety grounds	None required			
Visual and acoustic privacy and visual amenity	Adjacent to A5 trunk road and road traffic noise could be an issue, but other traveller sites front A5 in that area suggests this can be mitigated. Visual amenity issues considered under landscape assessment	Mitigate through effective screening			
Located on contaminated land	No	None required			

Archaeological significance	Site does not contain any known archaeology and whilst it is located adjacent to Watling Street (HER 5508); the present land use means there is unlikely to be any surviving archaeological remains. No constraint.	None required
Area of protected wildlife	There may be badger in the area. However the site is an extension of an existing site and therefore there are no ecological constraints	None required
Impact on landscape	<p>This site lies within the <i>Ver Chalk Valley</i> and is within the Chilterns AONB. It is located within the shallow valley floor (adjacent to the existing Gypsy site) with valley sides rising to east to the undeveloped ridgeline, pylons run parallel along line of shallower valley sides. There is a strong visual relationship between the valley floor and ridge to east especially. Lower valley slopes are fragmented with gappy or lost hedgerow boundaries, paddocks / grazing and characterized by a dispersed mix of development / uses parallel to the A5 road corridor presenting an inconsistent edge and urban fringe image.</p> <p>The landscape strategy is to enhance the landscape – particularly the valley floor and road corridor and to restore hedgerow boundaries to lower valley slopes. Development considerations include :</p> <ul style="list-style-type: none"> • Conserve character / alignment of A5 Roman road, • Limit further ribbon development. 	<p>Site 92 would be acceptable on landscape grounds ,on the basis that:</p> <ul style="list-style-type: none"> • The site is adjacent to existing Gypsy and Traveller site and within the context of existing development. • Allocation of an extension does <u>not</u> involve significant change to A5 at entrance to ensure the site entrance retains a low key rural character e.g. kerbing is limited - if required, street lighting, signs, etc are avoided. • The existing roadside verge, ditch and hedgerow are retained and the existing hedgerow is reinforced to improve privacy and reduction in traffic noise. • Development is restricted to that shown on plan, within the valley floor, and encroachment of development is not allowed on to the eastern valley slopes. • A hedgerow/ hedgerow tree landscape buffer be included to the north and eastern site boundaries to contain / screen the site and separate site from the pylons to the eastern valley sides.
Proximity to other allocations	No issues	None required
Incline of site	No significant incline	None required

Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	5
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 26/50 (Score with single school category: 25/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape and on biodiversity. The site is Green Belt land. There is no record of archaeological remains on site. Development would encourage healthier lifestyles but is unlikely to encourage the use of sustainable transport systems.	

Site Ref: Site 116					
Site Address	1 Old Acres, Barton Road, Pulloxhill				
Number of pitches proposed	This is an existing site with 8 pitches (temporary permission has recently lapsed, this site is now categorized as unauthorized) The owner seeks authorization for the existing pitches with the option to extend site for up to an additional 10 pitches				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to the existing vehicle access off Barton Road some foliage cut back will be required to achieve SSD	Foliage cut back will be required to achieve SSD			
Visual and acoustic privacy and visual amenity	Existing Gypsy site, no concerns regarding acoustic amenity. Visual amenity issues considered under landscape assessment	Any additional development should be adequately screened to maintain visual and acoustic privacy and visual amenity			
Located on contaminated land	No	None required			
Archaeological significance	This site is located within an extensive medieval landscape that includes a deserted settlement and an area of ridge and furrow cultivation (HERs 241 and 3322). However as this site has already been developed with appropriate mitigation there is no objection to its allocation.	Mitigation requirements would depend on the specific nature of any development.			
Area of protected wildlife	This site has not been identified as ecologically significant and there are no species records for the site	None required			
Impact on landscape	Extending the site may spread of urban fringe influence	Screening and planting can help integrate any extension to the existing site			
Proximity to other allocations	This site is not in the vicinity of other site allocations	None required			
Incline of site	No incline	None required			
Located adjacent to	No	None required			

the motorway		
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	5
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 18/50 (Score with single school category: 18/40)	
Sustainability Appraisal		
Conclusion	Further development would have a limited impact on landscape and would not encourage the use of sustainable transport systems. However, it is a brownfield site so would not result in the loss of agricultural land. The site is not considered to be ecologically significant and there is no record of archaeological remains on site. There would be a positive impact on encouraging sustainable waste management.	

Site Ref: Site 78					
Site Address	Land East of M1, Tingrith				
Number of pitches proposed	This is an existing site with temporary permission for 2 pitches. The owner seeks authorization for pitches to be made permanent				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Part of Western boarder
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Part of western boarder	Avoid new development in flood zone			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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			
Safe access from the public highway	No objection on highways safety grounds	None required			
Visual and acoustic privacy and visual amenity	Noise from M1 requires further assessment in order to determine suitability of site for residential. Visual amenity issues considered under landscape assessment	This will depend on the results of the updated assessment.			
Located on contaminated land	There may be potential for sources of contaminated land				
Archaeological significance	Site does not contain any known archaeology, although it is located within a known archaeological landscape that includes prehistoric (HER 15835) and Roman remains (HER 236). However the present land use means there is unlikely to be any surviving archaeological	None required			

	remains. No constraint.	
Area of protected wildlife	This is not an area of ecological significance. As it is an existing site there are no ecological constraints	None required
Impact on landscape	Concern regarding site being isolated from settlements and noise levels from M1	Additional screening could be used to reduce impact of noise
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	Close proximity the M1 which may be adversely affected by road traffic emissions	Family wishes to stay on the site.
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	5
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	3
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste	Yes (5)	5

and Recycling Facilities	No (0)	
Conclusion	Score: 16/50 (Score with single school category: 16/40)	
Sustainability Appraisal		
Conclusion	Development would have a negative impact on the landscape and is on Green Belt. There may also be a negative impact on biodiversity. However, negative impacts are likely to be limited as it is an existing site seeking authorization. There is potential for archaeological remains to be found on site. It is unlikely that development would encourage the use of sustainable transport systems.	

Site Ref: Site 28					
Site Address	Land at the Bungalow				
Number of plots proposed	This is a private site, the owner requested up to 36 pitches for a Gypsy site				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	Pass Stage 1				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.			
Safe access from the public highway	No objection - This site has a direct access onto A5120 through an access serving a bungalow	The access point would require improvement and the level of visibility is not ideal and would undoubtedly require significant removal and setting back of the frontage boundary treatments. The site also has frontage to the track that would serve as access to site 11. This route would be preferable to access directly onto A5120.			
Visual and acoustic privacy and visual amenity	Noise from A5120 may be an issue if plots were to be located in close proximity. Visual amenity issues considered under landscape assessment	A full noise assessment would be required prior to development			
Located on contaminated land	No	None required			
Archaeological significance	Part of this site lies within the area of the medieval settlement of Bidwell (HER 16987), therefore, there is	This does not prevent development but mitigation may be required depending on the specifics of the			

	potential for archaeological remains to survive within the site.	development.
Area of protected wildlife	This is not an area of ecological significance. There may be badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	Conflict with Green Infrastructure corridor and growth area greening.	scope to screen and fence
Proximity to other allocations	In the proposed North of Houghton Regis Urban Extension Area	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	3
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3

Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 32/50 (Score with single school category: 28/40)	
Sustainability Appraisal		
Conclusion	The site would impact negatively on the landscape and is located within the Green Belt. There is potential for archaeological remains to be found on site and there maybe a negative impact on biodiversity. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems. A smaller site than the 36 pitches requested would be more sustainable and in keeping with national policy that advocated smaller family sites.	

4. Central Bedfordshire Council Gypsy and Traveller Local Plan Site Assessment: Stage 3, Potential New Sites

The GTAA Update 2013 outlined Central Bedfordshire need **65 pitches** from January 2013 to December 2018 (**period 1**) to address the backlog of need and household growth. Planning policy for traveller sites states local authorities must identify deliverable sites to meet this need. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable.

The GTAA Update 2013 outlined Central Bedfordshire needs **31 pitches** from January 2019 to December 2023 (**period 2**) to address household growth. Planning policy for traveller sites states local authorities must identify **developable** sites to meet this need and, where possible, identify developable sites for the third period January 2024 to December 2028. The GTAA suggests **36 pitches** are required from January 2024 to December 2028 (**period 3**).

To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

To bring the Gypsy and Traveller Local Plan in line with the Development Strategy for Central Bedfordshire, ORS identified the pitch requirement to 2031. Central Bedfordshire would require **25 pitches** from January 2029 to December 2031 (**period 4**).

The following sites represent potential new Gypsy and Traveller sites and are listed in order of their ranking at Stage 3. The sites all belong to Central Bedfordshire Council and have existing agricultural tenancies.

Site Ref: Site 81					
Site Address	Land North of Arlesey Road and W of Stotfold Leisure Centre				
Number of pitches proposed	To be confirmed				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	Pass Stage 1				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection - existing vehicle access to be used	None required			
Visual and acoustic privacy and visual amenity	Noise from development of Stotfold leisure centre to east may have significant impact on site. Visual amenity issues considered under landscape assessment	Further assessment will be required to determine suitability of site for residential.			
Located on	No	None required			

contaminated land		
Archaeological significance	Site does not contain any known archaeology, however lies to the north of an extensive area of cropmarks (HER 3086) and therefore has potential.	Any mitigation requirements would be dependent on the specifics of the development.
Area of protected wildlife	This is not an area of ecological significance and there are no protected species records	None required
Impact on landscape	Concern regarding extension of urban influence.	Needs substantial planting to screen site
Proximity to other allocations	Adjacent to the proposed Stotfold Leisure Centre	
Incline of site	Not significant	None required
Located adjacent to the motorway	No	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	5
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3

Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 35/50 (Score with single school category: 31/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on landscape but would result in the loss of high grade agricultural land. The site is not considered to be ecologically significant and there is no record of archaeological remains on site. Development would encourage healthier lifestyles and the use of sustainable transport systems	

Site Ref: Site 15					
Site Address	Land East of A6, West of Luton Road and South West of Barton-le-Clay				
Number of pitches proposed	To be confirmed				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Western part of site	Amend parameters to avoid flood zone			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.			
Safe access from the public highway	no objection to vehicle access off Luton Road (B655) as far north as possible subject to safe stopping distance (SSD)	None required			
Visual and acoustic privacy and visual amenity	Noise from A6 / local roads would require further assessment and would determine suitability of site for allocations. This would determine whether positioning or mitigation would be adequate. Visual amenity issues considered under landscape assessment	A full noise assessment would be required prior to development			
Located on contaminated land	Sources of potential contamination in the area	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	The site does not contain any known archaeological remains although it does have potential.	Mitigation requirements would depend on the specific nature of any development.			

Area of protected wildlife	There are records of badger, hare and polecat in the area	A full ecological assessment would be required prior to development
Impact on landscape	Impact on views from AONB; risk to nationally important downland/woodland Open fields - not suitable for fences or bunds.	Extensive planting would be required to effectively integrate
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	Site is bounded by A6 and local roads which may be adversely affected by road traffic emissions	Further assessment required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	5

Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 32/50 (Score with single school category: 29/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and is on Green Belt land. There may also be an adverse impact on biodiversity. The site has a watercourse running through it. Provision of adequate infrastructure is unlikely to be a problem in this area. In addition, there are no known archaeological remains on site.	

Site Ref: Site 5					
Site Address	Land North of Bury Hill, West of Sutton Road and East of Potton				
Number of pitches proposed	To be confirmed				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Sutton Road at mid-point along the straightest section of the road	None required			
Visual and acoustic privacy and visual amenity	Potential impact from road traffic. Visual amenity issues considered under landscape assessment	Careful allocation can overcome this given scale of site.			
Located on contaminated land	Northern part of the site may be contaminated	A full Contaminated land Survey would be required prior to development			
Archaeological significance	The site contains a Second World War pill box (HER 19689) and has the potential to contain other archaeological remains.	Mitigation requirements would depend on the specific nature of any development proposals.			
Area of protected wildlife	There is a Biodiversity Opportunity Area to West, and there may be water voles and otter	A full ecological assessment would be required prior to development			
Impact on landscape	Concern regarding loss of important open space in Potton and views in to site from roads and property.	Site must be well integrated and screened			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield, Greenfield or high	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3			

quality agricultural land		
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	5
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 31/50 (Score with single school category: 29/40)	
Sustainability Appraisal		
Conclusion	Development would have a negative impact on the landscape and may also affect biodiversity. The site would negatively impact upon the adjacent conservation area and also archaeological remains found on site. However, development is likely to encourage healthier lifestyles and the use of sustainable transport systems. The site would contribute to the efficient use of land as it is located on relatively low grade agricultural land.	

Site Ref: Site 36					
Site Address	Land North of Standalone Warren and South of Northwood End Road, Haynes				
Number of pitches proposed	To be confirmed				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Along the southern boarder
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Along southern boarder			Amend parameters to avoid Flood zone	
Located in Green Belt	No			None required	
Safe access from the public highway	no objection to vehicle access off Northwood End Road however in view of the dwellings opposite it is preferable that vehicle access is off Standalone Warren - extensive foliage cut back will be required to achieve SSD			foliage cut back	
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	Gas works adjacent may be a potential source of contamination			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	Part of this site lies within the area of the medieval settlement of Northwood End Haynes (HER 17043), therefore, there is potential for archaeological remains to survive within the site.			This does not prevent development but mitigation may be required depending on the specifics of the development.	
Area of protected wildlife	This is not an area of ecological significance. However there may be badger and hare in the area			A full ecological assessment would be required prior to development	
Impact on landscape	There is concern regarding urban fringe influence and loss of quality to open landscape.			This site would be best placed to the north of the available land in order to better integrate the site with the context of the village and better screen the site	
Proximity to other allocations	No			None required	

Incline of site	There is a significant incline. However this can be mitigated by locating pitches towards the top of the site, on the flatter ground	locate pitches towards the top of the site, on the flatter ground
Located adjacent to the motorway	no concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	5
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 29/50 (Score with single school category: 28/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and biodiversity. Impact on the efficient use of land would be limited as the site is currently medium grade agricultural land. There is	

potential for archaeological remains to be found on site. The site is very close to public transport links although it is not close to community facilities and schools.

Site Ref: Site 13					
Site Address	Land East of A5120 and North of Westoning Road				
Number of pitches proposed	To be confirmed				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	Pass Stage 1				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Western boundary of the site is in the Flood Zone 2	Development should be placed away from the western boundary of the site			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.			
Safe access from the public highway	no objection to vehicle access off Westoning Road at mid-point along the longest straight section of the road	None required			
Visual and acoustic privacy and visual amenity	Noise from railway line to the east of the site and A5120 of concern. Visual amenity issues considered under landscape assessment	Further assessment would be needed to confirm suitability of site for development. Mitigation and suitable positioning may overcome issues.			
Located on contaminated land	No	None required			
Archaeological significance	The site contains an area of post-medieval occupation identified from surface finds. Therefore, there is the potential for archaeological remains to survive within the site. This does not prevent development but mitigation is likely to be required.	Mitigation requirements would be dependent on the specifics of the development.			
Area of protected wildlife	This is not an ecologically significant site. However	A full ecological assessment would be required before			

	there may be Great Crested Newts, Slow worm, and Badger in the area	development could commence
Impact on landscape	There is concern regarding the potential impact on the landscape topography as it is a large field, with few trees. Development may be out of character with the area	Extensive woodland and/or hedgerow planting would be required to screen the site
Proximity to other allocations	The site is not in the vicinity of other site allocations	None required
Incline of site	No incline	None required
Located adjacent to the motorway	The site is not adjacent to the motorway and there are no concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	5

Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 28/50 (Score with single school category: 27/40)	
Sustainability Appraisal		
Conclusion	Development may impact negatively on the landscape and biodiversity. There is also potential for archaeological remains to be found on site. The site is also within the Green Belt. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems. Provision of adequate infrastructure is unlikely to be a problem in this area.	

Site Ref: Site 75					
Site Address	Land East of Fairfield and South of the former Pig development unit				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Eastern edge
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Eastern edge	amend parameters to avoid Flood Zone			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to this site since there is an existing vehicle access off from the roundabout however the access is designed for use by only for the existing few houses which currently use it - the widening/redesigning of the access and removal of planting will need to be undertaken to accommodate the increased traffic generation	removal of planting will need to be undertaken to accommodate the increased traffic generation			
Visual and acoustic privacy and visual amenity	Site may be affected by proposed redevelopment of Pig Development Unit to north for mixed industrial uses generating noise/light/dust/fumes. Visual amenity issues considered under landscape assessment	A full noise assessment would be required prior to development			
Located on contaminated land	Site may be affected by proposed redevelopment of Pig Development Unit; asbestos is known to be currently contaminating that site on a large scale.	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	Site adjacent to HER 16801 (an extensive area of late prehistoric occupation) and therefore has potential.	Mitigation requirements would be dependent on the specifics of the development.			
Area of protected wildlife	This is not an area of ecological significance and there are no species records	None required			
Impact on landscape	Concern impact on Pix Brook	Scope to integrate through planting			

Proximity to other allocations	Site may be affected by proposed redevelopment of Pig Development Unit to north for mixed industrial uses	Consider noise impact
Incline of site	No significant incline	None required
Located adjacent to the motorway	This site is not located adjacent to the motorway. However, there is a potential impact from redevelopment of Pig may generate fumes/odors and gases.	Further assessment required prior to development
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5

Conclusion	Score: 26/50 (Score with single school category: 26/40)
Sustainability Appraisal	
Conclusion	Development would have a limited impact on the landscape and would result in the loss of medium grade agricultural land. The site is not considered to be ecologically significant. There is potential for archaeological remains to be found on site. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.

Site Ref: Site 70					
Site Address	Land West of Wrayfields and North of Malthouse Lane, Stotfold				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Edge of site
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS Amend parameters to avoid flood zone				
Stage 2					
Criteria	Answer		Mitigation		
Located in Flood Zone 2	Southern edge		Amend parameters to avoid flood zone		
Located in Green Belt	No		None required		
Safe access from the public highway	no objection to vehicle access off either Wrayfields or Malthouse Lane, however Wrayfields is preferred because there is no playground off Malthouse Lane		None required		
Visual and acoustic privacy and visual amenity	Adjacent commercial nursery (Springfield's) to northern boundary will generate noise from plant and yard areas but working hours and degree of impact not known. Also recreation ground to south west of site but this is currently an open playing field with picnic benches so unlikely to be significant noise source. Visual amenity issues considered under landscape assessment		A full noise assessment would be required prior to development		
Located on contaminated land	Adjacent commercial nursery may pose contamination problems.		A full Contaminated Land Survey would be required prior to development		
Archaeological significance	Site does not contain any known archaeology; however it is located to the east of two areas of known archaeology (HER 16827 and 1774) and is within a landscape that has produced a number of Roman and medieval finds, therefore it has potential.		Mitigation requirements would be dependent on the specifics of the development.		
Area of protected wildlife	A County Wildlife Site runs along river corridor and there may be badger and water vole		A full ecological assessment would be required prior to development		
Impact on	Landscape strategy to		careful design and significant		

landscape	conserve level corridor; would need careful design and screening. Would extend urban fringe to river valley	screening
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	

Stage 3

Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 25/50 (Score with single school category: 25/40)	

Sustainability Appraisal

Conclusion	Development would have a significant negative impact on the
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landscape and would result in the loss of high grade agricultural land. Biodiversity may also be negatively impacted. There is potential for archaeological remains to be found on site. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.

Site Ref: Site 16					
Site Address	Land West of A6, South of Faldo Road and West of Barton-le-Clay				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	Pass Stage 1				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	Yes			PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.	
Safe access from the public highway	No objection -the site has a significant length of frontage to Faldo Road bordered by an established hedge set well back from the highway. It would be possible to construct an access, having appropriate visibility splays, within this frontage			Ensure appropriate visibility splays	
Visual and acoustic privacy and visual amenity	Noise from A6 road traffic will be a concern. However, given scale of site with appropriate assessment and subsequent location and mitigation a solution could be found. Similar issues with noise light and odor from industrial estate will require careful consideration. Visual amenity issues considered under landscape assessment			A full noise assessment would be required before development could commence	
Located on	No			None required	

contaminated land		
Archaeological significance	The southern part of the site is within the area of the Brook End Green medieval settlement (HER 17011) and immediately south of another area of medieval occupation at Grange Farm (HER 9356). The site, therefore, has the potential to contain archaeological remains. This does not prevent development but mitigation is likely to be required. It is also within the setting of Faldo Farm medieval moated site (HER 239 and SM 24410) which is a Scheduled Monument and a nationally designated heritage asset.	The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development.
Area of protected wildlife	This site has not been identified as ecologically significant. There may be badger in the area	A full ecological survey would be required before development could commence
Impact on landscape	Concern regarding views from AONB. However there is scope to integrate with existing planting	Planting and screening to integrate site
Proximity to other allocations	Not in the vicinity of other allocations	None required
Incline of site	No incline	None required
Located adjacent to the motorway	In close proximity to A6 and odor from industrial estate a concern	Further assessment required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to lower	Good, within 10min walk (5)	1

school (walking)	Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 24/50 (Score with single school category: 23/40)	
Sustainability Appraisal		
Conclusion	The impact on the landscape is likely to be limited although development would result in the loss of agricultural land. There is potential for archaeological remains to be found on site. Development may encourage healthier lifestyles and the use of sustainable transport systems. Provision of adequate infrastructure is unlikely to be a problem in this area.	

Site Ref: Site 20					
Site Address	Land East of Flitwick Road and South of Maulden				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off New Road - whilst close to an existing junction of New Road with Flitwick Road - its is preferable to increasing more junctions and potential conflict points along Flitwick Road			None required	
Visual and acoustic privacy and visual amenity	There are multiple noise sources in the area, Blackmoore Business Park, Hill Farm the A507 which would require assessment. Visual amenity issues considered under landscape assessment			The site may have potential given careful location and mitigation but this is subject to the results of a full noise assessment.	
Located on contaminated land	Potential sources of contamination			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The site does not contain any known archaeology; however, it is on the northern edge of an extensive Iron Age and Roman site (HER 918). In the Roman period this site is high status with substantial evidence for religious or ritual activity. The full extent of this site has not been defined and it likely to extend northwards, therefore, this site has high potential to contain archaeological remains, this does not preclude development but mitigation is likely to be required.			This does not preclude development but mitigation is likely to be required depending on the specifics of the development.	
Area of protected	This site is adjacent to a			A full ecological assessment	

wildlife	County Wildlife Site and there may be water vole, badger and common lizard in the area	would be required prior to development
Impact on landscape	concern regarding impact on urban fringe influence - elevated site on Greensand very large open site scope for acoustic features if well integrated	Scope for acoustic features if well integrated
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	5

Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 24/50 (Score with single school category: 22/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and would result in the loss of high grade agricultural land. There are also records showing the presence of protected species nearby and there is potential for archaeological remains to be found on site. There would be a positive impact on encouraging sustainable waste management and development may encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 2					
Site Address	Land South of Deadman's Cross, North of Rowney Warren Wood				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Northwood End Road mid-point along its frontage	None required			
Visual and acoustic privacy and visual amenity	Small area to north of site may be subject to adverse noise from garage and road traffic. Visual amenity issues considered under landscape assessment	Careful location within large allocated site can overcome such			
Located on contaminated land	Land adjacent may be contaminated	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	Site does not contain any known archaeology, although has potential.	Mitigation requirements would be dependent on the specifics of the development.			
Area of protected wildlife	The site is adjacent to a County Wildlife Site and there are record of hare and badger in the area	A full ecological assessment would be required prior to development			
Impact on landscape	Concern regarding urban fringe influence in Greensand landscape and open landscape,	Scope to integrate with adequate screening			
Proximity to other allocations	No	None required			
Incline of site	Sloping site	Locate site on most appropriate ground			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield, Greenfield or high	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3			

quality agricultural land		
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 23/50 (Score with single school category: 22/40)	
Sustainability Appraisal		
Conclusion	The site is likely to have a negative impact on the landscape and would result in the loss of medium grade agricultural land. There may also be some impact on biodiversity. However, there are no known archaeological remains on site and development is likely to encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 76					
Site Address	Land South of Fairfield and West of Stotfold Rd				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection on highway safety grounds	None required			
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment	None required			
Located on contaminated land	Potential contamination	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	Site adjacent to HER 16801 (an extensive area of late prehistoric occupation) and therefore has some potential.	Mitigation requirements would be dependent on the specifics of the development.			
Area of protected wildlife	There is a County Wildlife Site to the west of the site	A full ecological assessment would be required prior to development			
Impact on landscape	Concern regarding openness but a small site could be effectively integrated with screening and planting	screening and planting to integrate site			
Proximity to other allocations	No	None required			
Incline of site	Slight slope	Leveling if required			
Located adjacent to the motorway	This site is not located adjacent to the motorway. However, it may be periodically affected by odor from Letchworth Sewage Treatment Works to east but existing residential properties closer to works.	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on	Located on Brownfield (5)	3			

Brownfield, Greenfield or high quality agricultural land	Greenfield (3), High Grade Agricultural land (0).	
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	3
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 21/50 (Score with single school category: 21/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape and on biodiversity. It would also result in the loss of medium grade agricultural land. There is potential for archaeological remains to be found on site. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 80					
Site Address	Land West of Blunham Road and South of Chalton Farm, Chalton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	the sites frontage has bends and the planting/foliage is extensive resulting in obstruction of sightlines	Extensive cutback of planting/ foliage would be required to remove obstruction to sightlines			
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment	None required			
Located on contaminated land	No	None required			
Archaeological significance	Site does not contain any known archaeology, however is located within a landscape that includes an extensive area of cropmarks (HER 2665) and therefore has potential.	Any mitigation requirements would be dependent on the specifics of the development.			
Area of protected wildlife	There may be midwife toad, grass snake, common lizard and hare in the area	A full ecological assessment would be required prior to development			
Impact on landscape	Concern regarding spread of urban fringe influence and risk to new woodland	Open site but scope to integrate is small facility and well planted			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0			

Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	3
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 21/50 (Score with single school category: 21/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape but would result in the loss of high grade agricultural land. There may also be a negative impact on biodiversity. There is no record of archaeological remains on site. Development would encourage healthier lifestyles.	

Site Ref: Site 56					
Site Address	Land north of Everton Road, west of Potton Road and north west of Potton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Everton Road however extensive foliage cut back will be required to achieve SSD	extensive foliage cut back will be required to achieve SSD			
Visual and acoustic privacy and visual amenity	Potential impact from road traffic and noise from quarry. Given size of possible area this should be overcome through careful positioning / mitigation. Visual amenity issues considered under landscape assessment	This will have to be given more detailed consideration.			
Located on contaminated land	No	None required			
Archaeological significance	Site lies adjacent (to the west) of an area of cropmarks (HER 3216) which probably represent prehistoric/Roman settlement and therefore there is some potential for archaeological remains to exist within this site.	This does not prevent development but mitigation is likely to be required.			
Area of protected wildlife	The site is within a Biodiversity Opportunity Area	A full ecological assessment would be required prior to development			
Impact on landscape	No residential context; concern regarding urban fringe impact on Greensand landscape. large open field on rising ground	Scope for planting to screen but open views from Ridge			
Proximity to other allocations	No	None required			
Incline of site	Sloping site	Located on most suitable ground			
Located adjacent to	No concerns regarding air	None required			

the motorway	quality	
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 19/50 (Score with single school category: 16/40)	
Sustainability Appraisal		
Conclusion	Development is likely to have a limited impact on the landscape although it would result in the loss of medium grade agricultural land. The site is within a Biodiversity Opportunity Area. There is potential for archaeological remains to be found on site. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 55					
Site Address	Land South East of Park Corner Farm and South of Dunton Lane				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection - No justifiable highway safety reason why this site should not be considered. Site has a considerable frontage to Dunton Lane. It would be feasible to provide an adequate access with appropriate visibility splays at some point within this frontage. However considerable removal/cutting of existing frontage hedge/trees would be required.	Removal/cutting of existing frontage hedge/trees would be required.			
Visual and acoustic privacy and visual amenity	Noise from Road Traffic /industrial uses may require consideration but not expected that this cannot be overcome through mitigation / positioning. Visual amenity issues considered under landscape assessment	overcome through mitigation / positioning			
Located on contaminated land	No	None required			
Archaeological significance	Inappropriate site. Located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541) and therefore a nationally designated heritage asset of the highest significance. In addition this site contains the cropmark	It appears effective mitigation cannot be found for a larger site. However the site remains in the process and a small (max 5 pitch) carefully located allocation may be considered			

	remains of what is likely to be a prehistoric/Roman agrarian settlement, the extent of which is not fully known. The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site in the shortlist.	
Area of protected wildlife	This is not an area of ecological significance. However there may be badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	The site has no residential context, increases urban fringe influence, rural road character important. Open fields ,lack feature ,rural area	Careful screening would be required
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient. However, careful consideration should be given to objections from the archaeologists. Result: PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public)	Good, within 10min journey (5), Fair, within 20min journey	1

transport)	(3), Poor, within 30min journey (1), anything above 30mins (0)	
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 18/50 (Score with single school category: 16/40)	
Sustainability Appraisal		
Conclusion	Development is likely to have a limited impact on the landscape although it would result in the loss of high grade agricultural land. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems. There would be a significant negative impact on the scheduled monument.	

Site Ref: Site 54					
Site Address	Land South West of Park Corner Farm and South of Dunton Lane				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	Small part of site to the west	Amend parameters of site to avoid flood zone			
Located in Green Belt	No	None required			
Safe access from the public highway	No justifiable highway safety reason why this site should not be considered. Site has a considerable frontage to Dunton Lane. It would be feasible to provide an adequate access with appropriate visibility splays at some point within this frontage. However considerable removal/cutting of existing frontage hedge/trees would be required.	Considerable removal/cutting of existing frontage hedge/trees would be required.			
Visual and acoustic privacy and visual amenity	Noise from Road Traffic may require consideration but not expected that this cannot be overcome through mitigation / positioning. Visual amenity issues considered under landscape assessment	This will require careful design and location.			
Located on contaminated land	No	None required			
Archaeological significance	Inappropriate site. Located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541) and therefore a nationally designated heritage asset of the highest significance. In addition archaeological remains including upstanding ridge and furrow and settlement earthworks (HER 17786) are known on the eastern side of	It appears effective mitigation cannot be found for a larger site. However the site remains in the process and a small carefully located allocation may be considered,			

	the site and early medieval settlement remains (HER 17738) have been investigated in the central area. The impact on the historic environment is too great to mitigate, therefore the Archaeology Team strongly objects to the inclusion of this site in the shortlist.	
Area of protected wildlife	There is a County Wildlife Site adjacent to the site and there may be badger in the area	A full ecological assessment would be required prior to development
Impact on landscape	There is no residential context, increases urban fringe influence and risk to habitats.	Open fields some scope to screen with planting.
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient. However, careful consideration should be given to objections from the archaeologists. Result: PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public)	Good, within 10min journey (5), Fair, within 20min journey	1

transport)	(3), Poor, within 30min journey (1), anything above 30mins (0)	
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 17/50 (Score with single school category: 15/40)	
Sustainability Appraisal		
Conclusion	Impact on the landscape and biodiversity is likely to be limited. However, development would result in the loss of high grade agricultural land. There is potential for archaeological remains to be found on site. The site is unlikely to encourage the use of sustainable transport systems.	

Site Ref: Site 63a					
Site Address	Land east north of Sutton Road and east of Sutton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Sutton Road mid-point along its frontage	None required			
Visual and acoustic privacy and visual amenity	Potential impact from road traffic. Further investigation required. Visual amenity issues considered under landscape assessment	Further investigation required prior to development			
Located on contaminated land	No	None required			
Archaeological significance	Site includes an area of cropmarks (HER 2941) and lies to the north-east of another group (HER 9100) which together probably represent a later prehistoric funerary landscape. Therefore there is some potential for archaeological remains to survive within the site.	This does not prevent development but mitigation is likely to be required.			
Area of protected wildlife	This is not an ecologically significant site	None required			
Impact on landscape	This site can be integrated into the growth area for village.	Screening and planting to integrate			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield, Greenfield or high	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0			

quality agricultural land		
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 17/50 (Score with single school category: 16/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape but would result in the loss of high grade agricultural land. There is potential for archaeological remains to be found on site. However, the site is not considered to be ecologically significant.	

Site Ref: Site 60					
Site Address	Land South of Wrestlingworth Road and East of Sutton Road				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Sutton Road mid-point along its frontage, instead of Wrestlingworth Road which is a higher class of road (B1042)			None required	
Visual and acoustic privacy and visual amenity	Potential impacts, noise odors etc from limited number of land uses which surround site. Visual amenity issues considered under landscape assessment			Given size of allocated area it is expected that these could be overcome as a result of careful positioning of final site	
Located on contaminated land	No			None required	
Archaeological significance	Site includes an area of cropmarks (HER 15084) and lies to the north of an extensive area of cropmarks (HER 2941) which together probably represent a later prehistoric funerary landscape. Therefore there is some potential for archaeological remains to survive within the site.			This does not prevent development but mitigation is likely to be required.	
Area of protected wildlife	This is not an area of ecological significance however there may be badger			A full ecological assessment would be required prior to development	
Impact on landscape	Reduce separation between villages, risk to plantation. very open large site, poor context			Significant screening and planting required to integrate site	
Proximity to other allocations	No			None required	
Incline of site	No significant incline			None required	
Located adjacent to the motorway	No concerns regarding air quality			None required	

Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	1
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 17/50 (Score with single school category: 16/40)	
Sustainability Appraisal		
Conclusion	The development would have a limited impact on the landscape although it would result in the loss of high grade agricultural land. There may be badgers on site so biodiversity may be negatively affected. There is potential for archaeological remains to be found on site. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 102					
Site Address	Land South of Greenfield Road, Flitton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection	None required			
Visual and acoustic privacy and visual amenity	Minor concern regarding noise from sports facilities. Visual amenity issues considered under landscape assessment	Consideration should be taken on lay out to mitigate noise from the use of the sports facilities			
Located on contaminated land	Land adjacent may be contaminated therefore there is a possibility of contaminated land on the site	A full soil assessment would need to be undertaken prior to development			
Archaeological significance	Site does not contain any known archaeology, although it is adjacent to HER 16646 which is an enclosure of probably prehistoric date and therefore this site has potential.	Mitigation requirements would depend on the specific nature of any development.			
Area of protected wildlife	This site has not been identified as ecologically significant. However, there may be badger in the area	A full ecological survey would be required before development could commence			
Impact on landscape	There is concern regarding integration and openness	A smaller site would be preferable designed to respect linear character of the area			
Proximity to other allocations	Not in the vicinity of other allocations	None required			
Incline of site	No incline	None required			
Located adjacent to the motorway	no concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield,	Located on Brownfield (5) Greenfield (3), High Grade	0			

Greenfield or high quality agricultural land	Agricultural land (0).	
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	3
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	5
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 16/50 (Score with single school category:16/40)	
Sustainability Appraisal		
Conclusion	Development would have a negative impact on landscape and would result in the loss of high grade agricultural land. There is no record of archaeological remains on site although there are records of remains on adjacent land. It is unlikely that development would encourage the use of sustainable transport systems.	

Site Ref: Site 58					
Site Address	Land East of Potton Road and South of Ram Farm				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to vehicle access off Potton Road mid-point along its frontage	None required			
Visual and acoustic privacy and visual amenity	Concerns over dust nuisance / noise from neighbouring quarry. Careful consideration required but given scale of allocation through careful locating and mitigation, matters can be overcome. Visual amenity issues considered under landscape assessment	Careful design and location.			
Located on contaminated land	No	None required			
Archaeological significance	Site partially includes an area of cropmarks (HER 657) which probably represent prehistoric/Roman settlement and therefore there is the potential for archaeological remains within this site.	This does not prevent development but mitigation is likely to be required- depending on the specifics of the development			
Area of protected wildlife	This is a Biodiversity Opportunity Area and there may be Great Crested Newts and badger	A full ecological assessment would be required prior to development			
Impact on landscape	Significant Concern regarding impact on open "heathland" Greensand character, urban fringe risk. Isolated, no context, open farmland. The landscape character sensitivity for this area is judged to be High, with visual sensitivity being Moderate-High. The foreground to the Ridge is an extremely	Needs careful location and detail design			

	important part of the landscape. In this location the underlying heathland character has been noted. This site is not appropriate in terms of landscape impact	
Proximity to other allocations	No	None required
Incline of site	No significant incline	None required
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5

Conclusion	Score: 16/50 (Score with single school category: 15/40)
Sustainability Appraisal	
Conclusion	Development of this site would negatively impact on the landscape, in particular the Greensand Ridge and biodiversity as there are records of protected species on site. Development would also result in the loss of high grade agricultural land. However, there would be a positive impact on encouraging sustainable waste management and possibly also encouraging healthier lifestyles and the use of sustainable transport systems.

Site Ref: Site 4					
Site Address	Land East of Biggleswade Road, West of Sutton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Biggleswade Road at mid-point along the straight sections of the road		None required		
Visual and acoustic privacy and visual amenity	Road traffic noise could be a concern but given size of site this can be overcome through careful positioning of plots. Visual amenity issues considered under landscape assessment		This can be overcome through careful positioning of plots		
Located on contaminated land	No		None required		
Archaeological significance	Site includes an area of cropmarks (HER 9098) which probably represent prehistoric/Roman land division, possibly associated with contemporary settlement, and therefore there is the potential for archaeological remains within this site.		This does not prevent development but mitigation is likely to be required		
Area of protected wildlife	There is a Biodiversity Opportunity Area to the East and there may be water vole in the area		A full ecological assessment would be required prior to development		
Impact on landscape	Development is likely to be visually intrusive, site has open views. Small land parcel out of character need to associate with shelterbelt		Need to associate with shelterbelt		
Proximity to other allocations	No		None required		
Incline of site	No significant incline		None required		
Located adjacent to the motorway	No concerns regarding air quality		None required		

Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	1
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	3
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 16/50 (Score with single school category: 12/40)	
Sustainability Appraisal		
Conclusion	There maybe a negative impact on archaeological remains. It is unlikely that the development would encourage healthier lifestyles or the use of sustainable transport systems. However, impact on the landscape would be limited.	

Site Ref: Site 26					
Site Address	Land South of Dunton Lane and W of Dunton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to vehicle access off Dunton Lane at mid-point of sites frontage with the road	None required			
Visual and acoustic privacy and visual amenity	Noise from road traffic a concern but expected this can be mitigated through careful positioning and other forms of mitigation given the size of the carriageway. Visual amenity issues considered under landscape assessment	Mitigated through careful positioning.			
Located on contaminated land	Reservoir/water works is a potential source of contamination	A full Contaminated Land Survey would be required prior to development			
Archaeological significance	The site does not contain any known archaeological remains although it does have potential with a number of cropmark sites known from the immediate vicinity which are likely to represent prehistoric or Roman settlement.	Mitigation requirements would depend on the specific nature of any development.			
Area of protected wildlife	This is not an area of ecological significance though there may be badger in the area	A full ecological assessment would be required prior to development			
Impact on landscape	Concern that the site has no context. Farmland important to keep rural gap.	Create feature with tree planting and screening			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category				

	is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	3
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)0	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 15/50 (Score with single school category: 14/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and would result in the loss of high grade agricultural land. However, there would be a positive impact on encouraging sustainable waste management. It is unlikely that development would encourage the use of sustainable transport systems.	

Site Ref: Site 33					
Site Address	Land South of Silsoe Road and Wardhegdes				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	Pass Stage 1				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	No			None required	
Located in Green Belt	No			None required	
Safe access from the public highway	No objection to vehicle access off Silsoe Road			None required	
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	Adjacent plant nursery has potential sources			A full Contaminated Land Survey would be required prior to development	
Archaeological significance	The site does not contain any known archaeological remains although it does have potential with a number of cropmarks known from the immediate vicinity which are likely to represent prehistoric or Roman settlement.			Mitigation requirements would depend on the specific nature of any development.	
Area of protected wildlife	This site has not been identified as ecologically significant. However, there may be common lizard and badger in the area			A full ecological survey would be required before development could commence	
Impact on landscape	There is concern regarding impact on landscape character as the site is an isolated, very rural site with little context. There is little scope for integration or screening			Extensive planting would be requires to integrate site	
Proximity to other allocations	This site is not in the vicinity of other site allocations			None required	
Incline of site	No incline			None required	
Located adjacent to the motorway	No concerns			None required	
Conclusion	Whilst there is significant concern regarding the potential negative impact development could have on the landscape, it is considered that careful screening could mitigate this effectively. It is considered that the mitigation proposed for				

	each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	3
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 14/50 (Score with single school category: 14/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and would result in the loss of high grade agricultural land. There may also be a negative impact on biodiversity. However, there would be a positive impact on encouraging sustainable waste management. Development is unlikely to encourage the use of sustainable transport systems.	

Site Ref: Site 62					
Site Address	Land West of Sutton Road and North of Sutton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Sutton Road mid-point along its frontage	None required			
Visual and acoustic privacy and visual amenity	Potential impact from road traffic on Sutton Road but can be overcome through careful positioning of allocated site. Visual amenity issues considered under landscape assessment	This will require careful design and location.			
Located on contaminated land	No	None required			
Archaeological significance	This site is located within the known extent of Sutton Park (HER 7005) and is within the setting of John O'Gaunt's Hill (HER 510) which is probably a medieval motte. It is a Scheduled Monument and therefore a heritage asset of the highest significance.	There is therefore some archaeological potential at this site, however depending on the nature of the development it is likely that an appropriate mitigation strategy can be found.			
Area of protected wildlife	This is not an area of ecological significance and there are no species records for the area	None required			
Impact on landscape					
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield,	Located on Brownfield (5) Greenfield (3), High Grade	0			

Greenfield or high quality agricultural land	Agricultural land (0).	
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 14/50 (Score with single school category: 13/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape. The site is not considered to be ecologically significant and would contribute to the efficient use of land as it is currently relatively low grade agricultural land. There is potential for archaeological remains to be found on site.	

Site Ref: Site 63					
Site Address	Land East of Sutton Road and East of Sutton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	No objection to vehicle access off Sutton Road mid-point along its frontage	None required			
Visual and acoustic privacy and visual amenity	Potential impact from road traffic. Careful allocation can overcome this given scale of site. Visual amenity issues considered under landscape assessment	This will require careful design and location.			
Located on contaminated land	No	None required			
Archaeological significance	Site includes an area of cropmarks (HER 2941) and lies to the north-east of another group (HER 9100) which together probably represent a later prehistoric funerary landscape. Therefore there is some potential for archaeological remains to survive within the site.	This does not prevent development but mitigation is likely to be required.			
Area of protected wildlife	This is not an area of ecological significance and there are no species records in this area	None required			
Impact on landscape	Exposed site with little context	Screening and planting required to integrate site			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on	Located on Brownfield (5)	0			

Brownfield, Greenfield or high quality agricultural land	Greenfield (3), High Grade Agricultural land (0).	
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	0
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	1
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 14/50 (Score with single school category: 13/40)	
Sustainability Appraisal		
Conclusion	Development would impact negatively on the landscape and would result in the loss of high grade agricultural land. There is potential for archaeological remains to be found on site. However, the site is not considered to be ecologically significant.	

Site Ref: Site 1					
Site Address	Land South of Edworth Road and East of Langford				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	no objection to vehicle access off Edworth Road	None required			
Visual and acoustic privacy and visual amenity	Noise from Wind Farm will need careful assessment to determine if site is suitable. Visual amenity issues considered under landscape assessment	A full noise assessment would be required prior to development			
Located on contaminated land	No	None required			
Archaeological significance	Site lies within the area of a Second World War dummy airfield (HER 17918) of which there are some structural remains and in an area containing evidence of Iron Age and Roman occupation (HER 2796). Therefore, there is the potential for archaeological remains within this site.	This does not prevent development but mitigation is likely to be required			
Area of protected wildlife	This is not an area of ecological significance and there are no species records	Non required			
Impact on landscape	There is significant concern regarding urban fringe impact, site has no context; open views from Toplars Hill. This is open arable land with little existing screening ;not suitable to fence or bund	Extensive screening would be required, trees should not be removed from existing copse			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				

Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 13/50 (Score with single school category: 13/40)	
Sustainability Appraisal		
Conclusion	This site is likely to have a negative impact on the landscape and would result in the loss of high grade agricultural land. Development may also impact on archaeological remains. However, there is likely to be a positive impact on protecting biodiversity, encouraging healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 66b					
Site Address	Land West of Cambridge Road and North of Dunton				
Number of pitches proposed					
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	No	None required			
Safe access from the public highway	access off Cambridge Road along the mid-point of its frontage	None required			
Visual and acoustic privacy and visual amenity	Screening required to shield site from traffic noise from road. Visual amenity issues considered under landscape assessment	Screening required to shield from noise from road			
Located on contaminated land	No	None required			
Archaeological significance	Whilst this site is within the setting of Newton Bury Moat (HER 2815) a medieval moated residence with associated historic documentation dating it from 1504 it is far enough away so as not to prohibit development.	The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development.			
Area of protected wildlife	This is not an area of ecological significance and there are no species records	None required			
Impact on landscape	Openness of field would require substantial integration	Use planting and screening to integrate effectively			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			
Located adjacent to the motorway	No concerns regarding air quality	None required			
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS				
Stage 3					
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	0			
Access to major	Good, within 0.5-1mile (5)	1			

roads (A roads)	Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	0
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 12/50 (Score with single school category: 1240)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape but would result in the loss of high grade agricultural land. There is potential for archaeological remains to be found on site. However, the site is not considered to be ecologically significant. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.	

Central Bedfordshire Council Gypsy and Traveller Local Plan Site Assessment: Plots for Travelling Showpeople

The Gypsy, Traveller and Showperson Accommodation Assessment Update 2013 found a need for 8 additional permanent plots for Travelling Showpeople in Central Bedfordshire between 2013 and 2031.

Site Ref: Site 82					
Site Address	Kennel Farm Holdings, E of Biggleswade				
Number of pitches proposed	This site was previously allocated in the abandoned North DPD for 4 plots for Travelling Showpeople.				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	Along southern boarder
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer			Mitigation	
Located in Flood Zone 2	Along southern boarder			Amend parameters of site to avoid flood zone	
Located in Green Belt	No			None required	
Safe access from the public highway	No objection to vehicle access off either side of the site and at points where the private access roads/tracks meet the public highway.			None required	
Visual and acoustic privacy and visual amenity	No concerns regarding acoustic privacy. Visual amenity issues considered under landscape assessment			None required	
Located on contaminated land	No			None required	
Archaeological significance	The site is located within the setting of Stratton Moat and associated earthworks (HER 520) which is a Scheduled Monument (SM 11541) and therefore a nationally designated heritage asset of the highest significance. In addition a recently completed geophysical survey on the land to the immediate north-east has identified a part of a Bronze Age funerary landscape which is likely to continue into the proposed site. It is our opinion that the impact on the historic environment is too great to			This site has was previously allocated in the North DPD which was endorsed by council. The impact of any development within this site on the setting of the Scheduled Monument has to be taken into account and may preclude development. Significant mitigation is likely to be required depending on the specifics of the development.	

	mitigate and therefore the Archaeology Team strongly objects to the inclusion of this site on the shortlist. We do appreciate that this site has been put forward before, but we still believe it is an inappropriate site.	
Area of protected wildlife	Within Biggleswade Green Wheel and stream adjacent is a wildlife corridor	A full ecological assessment would be required prior to development
Impact on landscape	Concern regarding spread of urban fringe influence and risk to road frontage and spread of urban fringe influence.	scope if strongly integrated with planting
Proximity to other allocations	No	None required
Incline of site	Slight incline	Level if appropriate
Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	1
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	3
Access to	Good, within 10min walk (5)	1

community facilities (local food store)	Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	
Serviceable by Gas/Electricity/Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 28/50 (Score with single school category: 22/40)	
Sustainability Appraisal		
Conclusion	Development would have a limited impact on the landscape and biodiversity but would result in the loss of medium grade agricultural land. There would be a negative impact on the scheduled monument. Development of this site could encourage healthier lifestyles and the use of sustainable transport systems.	

Site Ref: Site 114					
Site Address	Land W of Billington Rd and W of Stanbridge				
Number of pitches proposed	This is a private site; the prospective owner has requested that 10 plots be allocated for Travelling Showpeople.				
Stage 1					
AONB	No	SSSI	No	Flood Zone 3	No
On or adjacent to unsafe environment or hazardous place	No				
Conclusion	PASS				
Stage 2					
Criteria	Answer	Mitigation			
Located in Flood Zone 2	No	None required			
Located in Green Belt	Yes	PPTS states: If a local planning authority wishes 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 specific, identified need for a traveller site, it should do so only 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.			
Safe access from the public highway	No objection on highways grounds	None required			
Visual and acoustic privacy and visual amenity	No issues. Visual amenity issues considered under landscape assessment	None required			
Located on contaminated land	No	None required			
Archaeological significance	The site does not contain any known archaeological remains though there is some evidence that it has been subject to coprolite extraction in the 19th century (HER 14028) it may retain some archaeological potential.	Mitigation requirements would depend on the specific nature of any development.			
Area of protected wildlife	This is not an area of ecological significance	None required			
Impact on landscape	Concern regarding urban fringe influence on character of historic village.	Scope regarding planting and integration, but important open space at junction			
Proximity to other allocations	No	None required			
Incline of site	No significant incline	None required			

Located adjacent to the motorway	No concerns regarding air quality	None required
Conclusion	It is considered that the mitigation proposed for each category is sufficient, therefore the result for this stage is PASS	
Stage 3		
Located on Brownfield, Greenfield or high quality agricultural land	Located on Brownfield (5) Greenfield (3), High Grade Agricultural land (0).	3
Access to major roads (A roads)	Good, within 0.5-1mile (5) Fair, within 1-2miles (3) Poor, within 2-3miles (1) No score, over 3 miles (0)	5
Access to public transport services	Good, within 5min walk (5) Fair, within 10min walk (3) Poor, within 20min walk (1) anything above 20mins (0)	5
Access to health services (GP)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	1
Access to lower school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	3
Access to middle school (walking)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Access to upper school (public transport)	Good, within 10min journey (5), Fair, within 20min journey (3), Poor, within 30min journey (1), anything above 30mins (0)	0
Access to community facilities (local food store)	Good, within 10min walk (5) Fair, within 20min walk (3) Poor, within 30min walk (1) anything above 30mins (0)	0
Serviceable by Gas/Electricity/ Sewerage	Yes, all (5) Yes, some (3) None (0)	3
Provision of Waste and Recycling Facilities	Yes (5) No (0)	5
Conclusion	Score: 25/50 (Score with single school category: 25/40)	
Sustainability Appraisal		
Conclusion	Development would have a negative impact on landscape and is within the Green Belt. The site is not considered to be ecologically significant and there is no record of archaeological remains on site although there are records of remains on adjacent land. Development would encourage healthier lifestyles and the use of sustainable transport systems.	

Appendix 1: Technical Report on Accessibility Data



Central Bedfordshire Council

Accessibility of sites assessed as part of the development of the Gypsy and Traveller Site Local Plan

October 2012

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1. Introduction

- 1.1 Accession is a software package that measures the general accessibility of locations – such as housing sites or services like doctors surgeries – according to set criteria as defined by the user. This is based on data from a range of transport modes, including public transport, walking, cycling, and car.
- 1.2 Accession assessments can be done on a time-based assessment (i.e. how long does it take to get there), frequency-based assessment (how far is a location from a public transport service of a set frequency, e.g. one bus an hour), or a cost-based assessment. This also takes into account the time period during which services are available.
- 1.3 The results from Accession give an overall indication as to which sites are deemed more of less accessible, for information and use by the software user. The results from Accession have been used to inform the development of the Local Transport Plan 3, and the Development Strategy.
- 1.4 In this case Accession has been used to establish the results for potential locations of Gypsy and Traveller Sites as part of the Gypsy and Traveller Local Plan. The criteria used are set out in Table 1. These criteria were agreed with the Development Strategy Team as the most appropriate for assessing the accessibility of these sites.

Table 1 – Criteria used for the Gypsy and Traveller Site Assessment

Criteria	Assessment method	Scores
Access to public transport services	Frequency (minimum of 1 service per hour)	Within 5 minute walk (5) Within 10 minute walk (3) Within 20 minute walk (1) Above 20 minute walk (0)
Access to health services (GP)	Time-based (walking)	Within 10 minute walk (5) Within 20 minute walk (3) Within 30 minute walk (1) Above 30 minute walk (0)
Access to Lower School	Time-based (walking)	Within 10 minute walk (5) Within 20 minute walk (3) Within 30 minute walk (1) Above 30 minute walk (0)
Access to Middle School	Time-based (walking)	Within 10 minute walk (5) Within 20 minute walk (3) Within 30 minute walk (1) Above 30 minute walk (0)

Criteria	Assessment method	Scores
Access to Upper School	Time-based (public transport)	Within 10 minute journey (5) Within 20 minute journey (3) Within 30 minute journey (1) Above 30 minute journey (0)
Access to Community Facilities (local food store)	Time-based (walking)	Within 10 minute walk (5) Within 20 minute walk (3) Within 30 minute walk (1) Above 30 minute walk (0)

1.5 Accession is one way of assessing the accessibility of a site. Other methods include London's PTAL (Public Transport Accessibility Level) system, as well as using online mapping systems such as Google Maps. Accession is used as it is an established best practice software approved for use by the Department for Transport. It was also found to be a sound method in the Examination in Public for the Site Allocations Document for the Northern Central Bedfordshire Local Development Framework.

- Access to public transport services (minimum frequency of 1 service per hour)
- Access to GP services (by walking time)
- Access to Lower Schools (by walking time)

2 **Assessment Parameters and Technical Information**

2.1 In order to run a calculation in Accession there are required project components

- Public Transport Networks
- Road Network
- Origin Sets
- Destination Sets

Public Transport Network

2.2 This data set consists of the most up to date public transport service and stop information that is available to Central Bedfordshire Council. This is a combination of Bedfordshire and its surrounding counties public transport information downloaded from the National Public Transport Data Repository (NPTDR).

2.3 This data consists of existing conventional public transport services (commercial and county council tendered bus services and rail services), excluding coach, schools contract and Demand Responsive Transport Services. This data is the most up-to-date available at the time of the assessment, which was October 2012.

Road Network

2.4 The Integrated Transport Network (ITN) has been obtained from Ordnance Survey for Bedfordshire and its surrounding authorities. This data is generally used by Accession to establish accessibility by walking or cycling to destinations or bus stops.

Origin Sets

2.5 Origins are a set of points that represent the start of any journey. They form the basis for any type of accessibility calculation and are often selected to represent where people live. The Easting and Northing points of potential Gypsy and Traveller Sites in Central Bedfordshire Council from 2011/12 were used as origin points.

Destination Sets

2.7 The destination set contains the end point for the trip and the number of destinations can range from a single destination to hundreds of destinations. The destination sets used for

these calculations are based on the key services required within the LDF were produced in the following way:

- **Heath Services (GP)** – A list of GP surgeries was compiled from the NHS website (www.nhs.uk). The search area used covered Bedfordshire and surrounding counties.
- **Hospitals** – The main acute hospitals with accident and emergency facilities within Bedfordshire and the surrounding areas were extracted from a Department for Transport supplied list of NHS hospitals in the UK. Any hospitals without accident and emergency facilities have been excluded.
- **Lower Schools, Middle Schools, and Upper Schools** – A list of schools that children in Central Bedfordshire attend has been obtained from the Sustainable School Travel Team. This data includes any Academies and Free Schools in Central Bedfordshire.
- **Community Facilities (Local Food Stores)** – Information on local foodstores, including supermarkets, smaller stores, and grocers, were extracted from a Department for Transport supplied list of such stores in Central Bedfordshire and in surrounding areas.

Time Periods

- 2.8 Accessibility calculations can be assessed for any time period in a day. The use of different facilities varies by the time of day, and therefore it is important to undertake Accession analysis that best fit the time of day where most trips to and from that facility are likely to take place.
- 2.9 Using information from the TRICS database, as well as knowledge from within the Transport Strategy Team, the following time periods have been chosen:

GP Surgeries – Tuesday, 10am to Midday

Hospitals – Tuesday, 10am to Midday

Lower, Middle, and Upper Schools – Tuesday, 7am to 9am

Community Facilities (Local Food Stores) – Tuesday, 7am to 9am

Frequencies

- 2.10 For the frequency calculation, a basic frequency of public transport services was set at one public transport service per hour between the hours of 7am and 9am. This can either be a local bus or rail service. Any stops with bus service frequencies of below this threshold during this time period are excluded from the calculation.

Default Values

- 2.11 For the purpose of the assessment, the default values within Accession have been used;
- Walk Speed – 4.8km/hr
 - Maximum connection distance – 0.4 km (distance to public transport stops)
 - Maximum interchange distance of 0.4 km (walk distance to make a public transport connection)
- 2.12 This ensures that the approach to these results is consistent across all areas of the authority.

Data Quality

- 2.13 All data used as by this analysis is from reputable data sources, and is the most up-to-date data available for this analysis. All data has been assumed to be complete and correct, but due to the changing nature of transport (for example local bus routes can change) this data may be subject to change at short notice.
- 2.14 Central Bedfordshire Council did undertake sense-checking of the results, based up local knowledge and understanding of the sites. Where potentially erroneous results were identified (for example sites located near known bus routes scored poorly for bus accessibility), Accession was re-run to test the accuracy of the assessment. This ensured that the results used for the Gypsy and Traveller Site Assessment was robust.

Assumptions

- 3.1 Accession software has a number of built-in operating assumptions that need to be taken into account when considering the results.
- 3.2 **Choice** – Accession makes an assumption that people will access their local facility (that is the easiest to get to based on the transport modes selected in the options for the calculation). No account is taken of preferential choice to access one facility over another, for example, reflecting the fact that different town centres often have different shops and personal choice. However, the impact of this issue is considered minimal as it is an exercise to represent the availability of any service location, rather than one of preferred choice.
- 3.3 **Buses run on Time** – Accession assumes that buses run exactly to their timetable. This assumption means that connections between services can always be made (if the timetable

and walk times allow) and it takes no account of the knock on effect that a delay to one service may have on further connections necessary to complete the journey.

- 3.4 **Buses aren't full** – No account is taken in Accession of bus loadings and the ability for people to physically get on a bus. Accession assumes that if a bus serves a particular route then it will always have the capacity to accommodate people wanting to board the bus.
- 3.5 **Walk Time** – As outlined above, Accession assumes a walk time to bus stops that is stipulated in the options before undertaking the calculation. This is then applied to all users of public transport. In reality, user groups walk at different speeds when accessing public transport.
- 3.6 **Quality of the Route** – No account is taken as to the quality of the walking or public transport route, which may affect people's choices as to what route to use, or whether to travel at all. This is because there is no facility within Accession to perform this kind of analysis.