

Appendix D

Gypsy and Traveller Local Plan Pre-Submission Consultation Table of Key Issues and Proposed Changes

31/12/13

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 The local plan should be withdrawn and incorporated within Central Bedfordshire emerging development strategy.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</p>	None

		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 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.”	
2.	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.	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.	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
3.	Paragraph 1.13 - Insertion of a caveat regarding the applicability of the Habitats Directive and related legislation / regulation and at what stage	There are no Natura 2000 or Ramsar sites in Central Bedfordshire. The Sustainability Appraisal concluded that the Gypsy and Traveller Local Plan would have	None

	(re)assessment would occur.	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 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	
4.	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>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	This is not an issue for the Plan	None

	owned sites" reflected in the Council's Community Asset Transfer strategy		
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	Officers agree that further detail needs to be provided in relation to anticipated windfall	None

	should form part of the deliverable/ developable supply.	provision. Officers are currently preparing a paper that outlines anticipated windfall levels based on historic trends and anticipated applications.	
11.	<p>The GTAA is flawed because:</p> <ul style="list-style-type: none"> - 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	The Council considers the Plan is in line with national guidance	None.

	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.		
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 the 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 closet 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.	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.	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.	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	<p>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.</p>	<p>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.</p>	
14	<p>Paragraph 5.11 should be expanded to state that</p>	<p>Highways Access is considered at paragraph 5.9</p>	None

	sites should be linked to existing communities/settlements by tarmac footpaths on at least one side of the linking highway.		
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	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. 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	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. 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	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>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>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 an 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 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</i></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

	<i>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>		
19	Policy GT5 fails to include a criterion for assessing the landscape impacts of development particularly within the Chilterns AONB.	Add “and any landscape designation” to bullet 6 in Policy GT5	Add “and any landscape designation” to bullet 6 in Policy GT5
20	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.	Change GT5 to state “Sites for gypsies and travellers will be granted planning permission providing that all of the following issues are addressed.”	Change GT5 to state “Sites for gypsies and travellers will be granted planning permission providing that all of the following issues are addressed.”
21	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.	Agree and make changes “sites will not be permitted that are immediately adjacent to railway lines, water bodies or power lines.”	Add to GT5: “sites will not be permitted that are immediately adjacent to railway lines, water bodies or power lines.”
22	Add a separate bullet point which states the importance of considering the impact of the	Change GT5 bullet 6 to read: “Ensure that any detrimental impact upon the character and	Change GT5 bullet 6 to read: “Ensure that any detrimental

	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).	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.”	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.”
23	Policy GT5 Insert as new Bullet 1: 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;	Add definition of Gypsies, Traveller and Travelling Showpeople as set out in the PPTS to the glossary	Add definition of Gypsies, Traveller and Travelling Showpeople as set out in the PPTS to the glossary
24	Policy GT5 Expand Bullet 2 to include at the end of the current text: 'specifically on education and health and the amenities of the adjoining community	Add “and services” to the end of bullet 2	GT5 Add “and services” to the end of bullet 2
25	Policy GT5: Reword Bullet 4 to read: Satisfactory and safe vehicular and pedestrian access to and from the public highway is provided	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	None

	<p>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>to vehicular and pedestrian access to and from the site at that stage.</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>	None

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."	<p>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..."</p> <p>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."</p>	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	If additional sites need to be found to meet an identified need the sites at Stage 3 of the Site	None.

	stage 3 “pool” or if an additional process will be undertaken to make later allocations.	Assessment may be considered again	
3.	<p>Change Policy GT8: Provision of space/facilities for business use on permanent gypsy & traveller sites.</p> <p>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.</p>	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.	<p>Further the policy should seek to establish entitlement and include a bullet that requires:</p> <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>	<p>The policy states “the use should relate to at least one of the households on the site”</p> <p>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...”</p>	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	Although the field is open in character, there is an	None

	Area of Outstanding Natural Beauty and Barton Hills NNR	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.	
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,	There is a large bund between the proposed site	None

	dust and pollution.	and the Industrial Estate limiting the harm presented by the Industrial Estate to residents of the site	
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	None

		consider the development of the site would harm Red Kites	
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	<p>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:</p> <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.” <p>The Gypsy and Traveller Local Plan complies with</p>	None

		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.	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	The results have been verified the Council stands by the assessment.	None

	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.		
27.	Inconsistent site selection process, (a number of people referenced specific sites) more suitable sites were deselected at Stage 2 and Stage 3.	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	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	A sustainable site does not necessarily have to be accessible by foot or even public transport	None

	transport from site	providing adequate services can be accessed in some format.	
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 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	All sites were made public in January 2013. No	None

	site until January 2013	parish Council's were informed before this time	
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	None

		Traveller sites.”	
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	None

		agricultural land is a Greenfield site.	
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