

Appendix 1

**Summary and Analysis of the Comments Received
During the Public Consultation of the Land Allocations
Issues & Options Paper January 2008 on the Six Areas Of
Search Identified For Gypsy and Traveller Provision
and The Council's Response.**

Summary and Analysis of the Comments Received During the Public Consultation on the Six Areas Of Search Identified For Gypsy and Traveller Provision and The Council’s Response.

“Land Allocations Issues & Options Paper January 2008”

Summary and Conclusions

4

Introduction

.Background

6

.The Approach to Analysing and Responding to the Consultation.

7

Part 1

The Public’s Overall Response to the Consultation

1.1 The Magnitude of Response and the Strongly Expressed Reasons to Reject the Six Locations.

9

1.2. Concerns about the process

East of England Regional Assembly

10

Scott Wilson

10

North Hertfordshire District Council

11

1.3. The Consultation Questions

Question 6: Unsuitability of the 6 areas identified: see Part 2

12

Question 7: The way forward?

12

Question 8: Extending existing sites?

13

Question 9: Other locations?

14

1.4. Seeking The Views of The Gypsy and Traveller Community.

15

Part 2
The Public's Response to the Six Identified Land Allocations
Public Consultation Question 6

2.1	Barkway	Site NH72: London Road	
		Site NH73: Buckland Road,	
	<i>The Comments Common to both Barkway Sites</i>		16
	<i>Specific Comments</i>		
	<i>Site NH72 London Road, Barkway</i>		19
	<i>Site NH73 Buckland Road, Barkway</i>		20
	<i>Conclusions On the Barkway Land Allocations</i>		22
2.2.	<u>Pirton:</u>		
		Site NH95 Land North of West Lane and	23
		Holwell Road.	
	<i>Conclusions On the Pirton Land Allocation</i>		25
2.3.	<u>Sandon:</u>		
		Site NH109: North of Payne End.	
		Site NH112: Land South of Notley Green.	
	<i>The Comments Common to both Sandon Sites</i>		27
	<i>The Location Specific Comments</i>		
	<i>Site NH109: North of Payne End, Sandon</i>		29
	<i>Site NH112: Land South of Notley Green Sandon</i>		30
	<i>Conclusions On the Sandon Land Allocations</i>		31
2.4.	<u>Whitwell, St Paul's Walden:</u>		
		Site NH16 West of The Bury, Lilley	
		Bottom Road.	32
	<i>Conclusions On the Whitwell Land Allocation</i>		35

Appendices

- Appendix A:** List of documents related to Gypsy and Traveller Provision and a Time Chart of the process.
- Appendix B:** North Hertfordshire District Council's Response to East of England Regional Assembly

Summary and Conclusions

- 1. There has been an overwhelming and virtually unanimous response against the six land allocations identified as areas of search for Gypsy and Traveller accommodation, some 3,000 responses were received. The magnitude of the response is such that half the total responses made on the whole document, focused on the single issue of Gypsy and Traveller accommodation and the six identified land allocations. Given that the six allocations were based around 4 small rural settlements with few households, the level of response and opposition from those within the local communities has been overwhelming.**
- 2. Unusually for a planning consultation, many people objected to the process, either the role of the East of England Regional Assembly, the Scott Wilson report or North Hertfordshire District Council. Officers accept that the public have found various shortcomings with the process. In particular the non-Green Belt criteria have resulted in six land allocations all located around small and isolated communities which are ill equipped to meet the needs of Gypsies and Travellers and still maintain the qualities of rural village life. However, the process has largely been driven by Government policy that non-Green Belt sites must be fully considered before Green Belt sites are looked at.**
- 3. The responses clearly show that the public consider that all the six land allocations are in areas where there are few, if any, local services and facilities that would benefit a Gypsy and Traveller community. The small size of the local communities, their isolated rural location and the lack of facilities are seen as the main reasons why the proposals should be rejected. Other reasons include site constraints and the impact of the proposals on the landscape and neighbouring properties or land uses. People also consider the proposals fail both to provide locations where the**

Gypsy and Traveller community wish to live and to preserve the qualities of rural and village life for the local communities.

- 4. Many people believed there were better locations more suitable for Gypsy and Traveller accommodation, these suggestions centred on brownfield sites, sites on the outskirts of the urban areas, west, north and east of Stevenage (the SNAP area) and where there was a demand from Gypsies and Travellers.**

- 5. In response to the consultations, Officers accept that all the six land allocations (Barkway(2), Pirton, Sandon(2) and Whitwell) have serious shortcomings and consider that none of the six should go forward in the LDF process or be identified in the Land Allocations - Preferred Options document scheduled for Spring 2009.**

- 6. Given these conclusions, when progressing any final East of England Regional Assembly requirements for Gypsy and Traveller accommodation in the East of England Plan, Officers will first focus on locations and the opportunities provided by the major growth areas located within the SNAP area north and west of Stevenage which is being promoted to be removed from the Green Belt.**

Introduction

Background

- a) In January 2008 North Hertfordshire District Council produced the Local Development Framework (LDF) document "Land Allocations Issues & Options Paper" for consultation with the public. Amongst many other issues and land allocations for a variety of land uses, the document identified 6 areas of search as options for Gypsy and Traveller provision. The six locations being:

Barkway: **Site NH72: London Road.**
Site NH73: Buckland Road,

Pirton: **Site NH95 Land North of West Lane**
and Holwell Road.

Sandon: **Site NH109: North of Payne End.**
Site NH112: Land South of Notley Green.

Whitwell, St Paul's

Walden: **Site NH16 West of The Bury,**
Lilley Bottom Road,

- b) At this early stage in the LDF process it is important to recognise that the Issues and Options Paper is one of several opportunities the public will have to comment on proposals before they are adopted as policy. At this stage the proposals are only options and no firm proposals have been made.
- c) Following considerations of the public consultation, North Hertfordshire District Council will determine which, if any, of the 6 areas of search

should be further considered for inclusion in the Preferred Options Report due to be published in Spring 2009 for further consultation. A further public consultation will occur when firm proposals are submitted to the Secretary of State (March 2010). The proposals and the public's comments will then undergo an Independent Examination (Jan–February 2011) with the adoption of the final policies and land allocations in the summer of 2011.

- d) This consultation stage on the “Land Allocations Issues and Options Paper” therefore is the important early stage of a long process which continues to engage the public before the policies and land allocations are confirmed.
- e) North Hertfordshire District Council jointly with Stevenage Borough Council are planning the future of an area west, north and east of Stevenage (Stevenage and North Hertfordshire Area Action Plan [SNAP]). The Key Issues and Options Document (2007) identified 4 areas of search for new Gypsy and Traveller provision (2 within North Hertfordshire and 2 within Stevenage) and a possibility to extend the existing provision at Dyes Lane, Stevenage. This document has been on public consultation; however, the results are yet to be considered by the two Councils.

The Approach to Analysing and Responding to the Consultation.

- f) The aim of this document is to produce a fair and full description of the points and comments received from the public consultation and then set out the Council's response.
- g) This document is an appendix to the main report which will be presented to the Cabinet meeting on 24 June 2008, and which will determine the way the Council intends to progress future provision for further Gypsy and Traveller Provision in North Hertfordshire. A further document containing each of the comments received on the draft Gypsy and Traveller land allocations has also been produced and will be available on the Council's website.

- h) Appendix A of this report provides a list of documents related to Gypsy and Traveller Provision and a Time chart of the process.
- i) It is fair to say that the issue of Gypsy and Traveller provision in the Land Allocations Document has generated a huge response. The number of representations and different comments raised on this single issue has been overwhelming. Given the scale of representations and the number of individual points made by the public, this report does not attempt to directly tie the Council's response to the points made by each and every individual. To do so would result in pages and pages of repetitive text and cross references, with the report resembling a directory rather than a summary and analysis of the responses received and the Council's response.
- j) This report therefore, rather than focusing on individual responses, attempts to provide a fair and comprehensive overview of the points made by the public and provide the Council's response. (In reading the responses there is a strong feeling of a common resolve amongst them, even if people may not have raised a point themselves, they possibly share the same concerns.) It is hoped that this approach more informative.
- k) Apart from the formal responses to the public consultation, the public also engaged in local meetings, contacts with their local elected representatives and contacts with the local authority.
- l) For the respondents who asked for the Council to answer specific questions it is hoped that this document addresses those concerns. In addition in response to the many questions raised on Gypsy and Traveller provision the Council has produced on its Website ([http://www.north-herts.gov.uk/index/planning/planning_policy_and_projects/gypsy_and_traveller accommodation/frequently asked questions_faqs .htm](http://www.north-herts.gov.uk/index/planning/planning_policy_and_projects/gypsy_and_traveller_accommodation/frequently_asked_questions_faqs.htm)) a document which lists the most common questions and provides answers.

Part 1 The Public's Overall Response to the Consultation.

1.1 The Magnitude of Response and the Strongly Expressed Reasons to Reject the Six Locations.

- 1.1.1 In total the public consultation attracted almost 3,000 responses regarding the 6 areas of search identified for Gypsy and Traveller provision. Many of the responses covered a multitude of comments and questions which means that thousands and thousands of individual points have been received. What is significant is that there was virtually unanimous opposition to the 6 areas of search identified. It was also obvious from the responses that the proposals had brought about a deep level of concern and anxiety within the local communities.
- 1.1.2 Clearly the level of negative response shows that the public had much to say on the Gypsy and Traveller provision included in the consultation document. However, given the rural nature of the land allocations it would be wrong to assess the level of feeling by just the number of responses even though a significant number have been received.
- 1.1.3 Given that the Gypsy and Traveller provision only made up a small part of the consultation document another way of judging the magnitude of the response is to compare the responses on the Gypsy and Traveller land allocations with the total number of responses made. The Land Allocations document which identified many different land allocations, received in total over 6,000 responses of which about half (almost 3,000) were concerned with the 6 Gypsy and Traveller Land Allocations. Clearly the Gypsy and Traveller Land Allocations is the issue that raised most comment from the public.
- 1.1.4 Given the rural nature of the 6 areas of search and the small communities close by it is informative to compare the responses by location of the land allocation with the size of the local community (remembering that while most responses came from within the local communities not all of them did.)

	Households (HCC 2001)	Reponses (rounded)
Barkway (2 allocations)	299	1070
Pirton	481	790
Sandon (2 allocations)	202	580
Whitwell (St Paul's Walden)	482	350
<i>Not directly related to a location</i>		210
		3000

1.1.5 A significant weight should be placed on these figures as they do give a good indication of the extent that the public was mobilised into responding virtually unanimously in a negative way to the Gypsy and Traveller aspect of the consultation document.

1.1.6 *NHDC Response: Given the public reaction and magnitude of the negative responses to the six allocations, NHDC could not fail to recognise that the allocations have been virtually unanimously rejected by the many people responding to the consultation. Many of the public have also voiced their opposition to the allocations at various meetings and to their elected representatives. The level and degree of public support or rejection is an important factor, however it is only one of many aspects that needs to be taken into account when determining the merits of the land allocations.*

1.2 Concerns about the process

1.2.1 A particular feature of this consultation is that in addition to the expected and sought after comments on the land allocations, very many people have voiced concerns over the process itself and the roles played by EERA (East of England Regional Assembly) Scott Wilson (Planning Consultants advising a group of Hertfordshire Local Authorities) and North Hertfordshire District Council.

EERA

1.2.2 Many people are unhappy with the way the East of England Regional Assembly (EERA) has imposed the need to make provision for some 15 Gypsies and Traveller pitches in North Hertfordshire, particularly the lack of clarity in matching the number of pitches in an area where even EERA's own research shows there is evidence of little demand. Many people were concerned that EERA was unrepresentative and non-elected.

1.2.3 *NHDC Response: NHDC objects to EERA's level of provision (15 pitches) in North Hertfordshire to 2011, as it is contrary to evidence of need (3 pitches) contained in EERA's own report. NHDC believes that the use of up to date evidence should guide provision post-2011. NHDC has made a full response to EERA (see Appendix B), which in it supports promoting any pitch provision as part of major new developments and through the Local Development Documents. NHDC believes there is sound sense in providing any needed Gypsy and Traveller provision in growth areas, where it can be successfully integrated into a growing new community.*

Scott Wilson Report

- 1.2.4 Many people have commented that they were very dissatisfied with the Scott Wilson report which identified and assessed potential areas of search for Gypsy and Traveller accommodation and made a final selection of nine locations in North Hertfordshire. Many people considered that report as inaccurate in part, shallow in assessment and seriously flawed. Of particular concern was that the Scott Wilson study had largely excluded Green Belt land which meant that potential locations around the major urban areas in the Green Belt were not fully considered. Instead the areas of search switched to small more isolated rural communities, which respondents feel are wholly inappropriate locations for Gypsy and Traveller accommodation.
- 1.2.5 When these isolated rural locations were further assessed and identified by the Scott Wilson report, many respondents reported they were astonished and found it incredible that locations, that in their minds clearly fail to meet basic criteria, were not rejected as obvious unsuitable locations.
- 1.2.6 *NHDC Response: Officers note the comments from respondents regarding any factual errors and omissions in the report. Following the public consultation, the insight provided by local respondents has helped improve and clarify the suitability assessment of the six land allocations.*
- 1.2.7 *NHDC Officers recognise that the exclusion of Green Belt locations has skewed the search to small and more isolated communities. However, it was inevitable that the Green Belt locations were excluded at this stage as Government advice remains that Gypsy and Traveller provision, along with much other development remains inappropriate development within the Green Belt. Only if on examination the locations in none Green Belt areas are shown to be unsuitable, is there the needed justification to then look at Green Belt locations. In the case of North Hertfordshire, the intention to remove land west, north and east of Stevenage from the Green Belt, and provide a new growth area in North Hertfordshire, provides a logical new area of search which has many advantages over those offered by the 6 land allocations identified in Barkway(2), Pirton, Sandon(2) and Whitwell.*

North Hertfordshire District Council

- 1.2.8 Some respondents questioned why NHDC only found it justifiable to drop three locations from the list of nine locations identified by Scott Wilson. Many felt that if some sites were dropped then other sites should have been equally dropped.
- 1.2.9 Many respondents questioned why, when there are long-standing policies to restrict development in the six locations identified, should

these policies be put aside to allow Gypsy and Traveller provision to be identified?

- 1.2.10 Some respondents questioned why no prior consultation on these proposals had taken place, suggesting that this damages public confidence in the Local Development Framework process. Some land owners were especially concerned that they had no prior notice that their land had been identified.
- 1.2.11 *NHDC Responses: Having debated the issues, Members voted to drop three locations and go forward with 6 locations for a public consultation.*
- 1.2.12 *NHDC recognises that there are existing policy restraints on development within the local areas which currently would not allow development of a Gypsy and Traveller provision. It is for this very reason that the public are being consulted in a process which could bring about a change and specific policies and land allocations to allow such development.*
- 1.2.13 *While the proposals came as an unexpected shock to many respondents, the formal consultation process on the Issues and Options Paper provides a fair and equal opportunity for everyone to both know what may be being proposed as an option and to make their comments. Where possible, all landowners were notified that their land had been identified prior to the formal consultation taking place.*

1.3 The Consultation Questions

Question 6: Unsuitability of the 6 areas identified (see Part 2)

Question 7: If none of the six areas in this document, or the two areas north of Stevenage which have been identified in the SNAP consultation document, are suitable/available, should the Council:

a. Consider using its compulsory purchase powers?

- 1.3.1 There is no support in the public's responses for the use of compulsory purchase powers, indeed many respondents feel it would be wrong to use them and urge the Council to state they will not be used.
- 1.3.2 No landowners of the land allocations responded that they were in support of the proposals or made any indication they would be willing

to sell the land. To the contrary there was indication that any use of compulsory purchase powers would be contested.

b. Look again at areas of search which were previously considered by Scott Wilson, but were not felt to merit inclusion in the final report?

- 1.3.3 There is widespread dissatisfaction with the Scott Wilson report and its process of selecting and discounting sites. Few people specifically engaged with this question and there is little support for revisiting the Scott Wilson list of sites, other than if to show up what people saw as the report's inconsistencies and errors.

c. Consider those areas of search which are in the Green Belt, but which are not being proposed to be removed from the Green Belt (listed in Appendix 1 of the Scott Wilson report)?

- 1.3.4 Few people engaged with this question. Many may not have had access to the Scott Wilson report, or believed it to be flawed. What many people have said is that sites would be better generally located on the edge of the major towns, which in most cases would mean being in the Green Belt.

d. Other locations (please specify)

- 1.3.5 (A list of sites or areas people consider more appropriate for Gypsy and Traveller accommodation is given under Question 9 below.)

Question 8: Do you consider that there is any scope to provide more pitches on the existing site at Pulmer Water, St Albans Road, Codicote?

- 1.3.6 Many people considered that extending existing sites as a more appropriate way of meeting extra Gypsy and Traveller accommodation. Some people suggest the Pulmer Water site by name as one that could be expanded.
- 1.3.7 However Codicote Parish Council has responded that Codicote already has a licensed site and therefore believe it to be unreasonable to even consider having an additional site. They would also not support the use of compulsory purchase powers.
- 1.3.8 *NHDC Response: Expanding an existing site is an option that can not, at this stage, be dismissed.*

Question 9: Do you know of any other areas in North Hertfordshire, not included in the sections above, which might be appropriate for Gypsy and Traveller use? Please specify the site, the owners (if known) and why you consider it is a suitable site.

- 1.3.9 While not answering the specific question put above, many people have suggested other areas and sites they believe would be more appropriate for providing new Gypsy and Traveller accommodation.
- 1.3.10 Royston Town Council commented that Travellers have been known to illegally use a site at Letchworth Gate. During the construction of the Baldock bypass the site offices were located on land at the junction of the A505 and B197. This site is close to schools, medical facilities and public transport and it is proposed that this should be considered for a permanent traveller site.

Locations Suggested	Notes
Brownfield Sites	
Expand Existing Sites	
Locate where the need /demand exists.	
On the edge of the major urban areas	
Areas to be removed from the Green Belt around Stevenage	
Close to main roads	
Publicly Owned Land	
Bassingbourn Existing Site	
Buntingford	
Royston	
Stevenage	
Former Green Belt	
Away from houses	
Old petrol stations on main roads	
Expansion of the existing site in Codicote.	
Expansion of the existing Dyes Lane Site Stevenage	
North East and West of Stevenage	this would provide better integration into a new community.
Land off the Baldock by-pass	recently used by construction workers, which is close to the road network and has existing services
RAF Henlow	A joint provision with new Central Bedfordshire

1.3.11 NHDC Response: Officers would not wish to re-open the Scott Wilson list of sites as the preferred way forward. Officers will look at all the

other suggestions, and in particular the merits of land to the North, East and West of Stevenage which is proposed to be taken out of the Green Belt as part of a major growth proposal within the SNAP area, as this seems to encapsulate many of the suggestions made by the public.

1.4 Seeking The Views of The Gypsy and Traveller Community.

- 1.4.1 Many respondents were concerned that the process had not taken into consideration the views of the Gypsies and Travellers, as advised in to Government Circular 1/2006. Many respondents refer to a letter from the Gypsy Council which comments on forcing Gypsies into areas where they do not want to be, which is described as being tantamount to social suicide and a complete waste of public time and money. The letter identifies concerns over sites on the outskirts of small villages where the established settled population may not be able to cope.
- 1.4.2 Some respondents refer to evidence from the Gypsy Council stating that many Gypsy and Traveller sites have shut down because the sites were located in areas where there was little demand as Gypsies and Traveller did not wish to stay at the location.
- 1.4.3 Many people strongly feel that if this view of the Gypsy Council had been fully considered in the process starting with Scott Wilson then the six sites identified would not have been found acceptable for further consideration either in Scott Wilson's final list or in the NHDC's "Land Allocations Issues & Options Paper January 2008".
- 1.4.4 *NHDC Response: NHDC did consult with the gypsy and Traveller Community during the formal consultation period, including the Gypsy Council (Romani Kris).*
- 1.4.5 *NHDC considers that matching a local provision to a local need contributes to successful sustainable development. NHDC therefore considers that in providing Gypsy and Traveller accommodation, the level and location of the provision should match the local need. The dangers of making ill matched provision to meet a regionally based contribution have been made to EERA. As the Gypsy Council has commented sites should not be placed where the Gypsy and Traveller community do not wish to live.*

Part 2 The Public's Response to the Six Identified Land Allocations
(Public Consultation Question 6)

2.1 Barkway: Site NH72: London Road.

Site NH73: Buckland Road.

- 2.1.1 In excess of 1,000 responses were received on the two Barkway locations. The letters showed strongly felt objections to the proposals and raised comments on many aspects of the proposal. Barkway Parish Council also made a comprehensive presentation of the opposition to the proposals, at a NHDC Cabinet meeting. Barkway Parish Council also made written representations opposing the Barkway land allocations as did Anstey, Reed, Therfield and Wyddial Parish Councils.
- 2.1.2 The Barkway community is the location for two 'areas of search' land allocations NH72 and NH73. Many of the objections or points made by respondents are common to both locations. This summary of the responses therefore draws together the common responses received on both locations and then deals separately with the comments specific to each location. The NHDC response is also provided as a combined response for both Barkway locations.

Comments Common to both Barkway Sites NH72 and NH73

Inadequate Local Facilities

- 2.1.3 Many respondents draw attention to the advice from Government and other bodies that Gypsy and Traveller sites should be located where the fullest range of facilities can be accessed. Most of the responses to the Barkway locations highlight and give an insight into the lack of the facilities available within Barkway, which are necessary to provide a suitable location for a new Gypsy and Traveller community.

Local Shopping

- 2.1.4 There is no local shop, the nearest being a small village shop in Barley some 3 miles distant.

Health Facilities

- 2.1.5 There are no local health facilities. The nearest GP is in Barley, but the practice is full and has not been taking new patients. Residents report that even after 12 years of living locally they have to use more distant health centres.
- 2.1.6 The nearest hospitals are at Cambridge and Stevenage.

Education

- 2.1.7 There is a small village primary school which many respondents state as being at capacity. The Head Teacher and Governors write that the school capacity is 52 pupils of ages 3.5 to 9 years. There is no scope for additional staffing or equipment. The school is Voluntary Aided and there is little provision for significant adaptations or additions to the school site.

Employment

- 2.1.8 Respondents write that Barkway is a small rural community where there are few local employment opportunities and most workers commute out from the area for work.

Public Transport

- 2.1.9 The respondents, particularly a number of teenagers, without access to cars, state the inadequacy of the local public transport service and how it prevents them from accessing educational, shopping, recreational, social and work opportunities. Many responses highlight the isolation of Barkway if you do not have access to a car.

Impact on The Local Community

- 2.1.10 Of much concern was a feeling that the proposal was completely out of scale with the size of Barkway and facilities available. Many people thought it made no sense to place these sites at villages ill equipped to take on a new community, without the necessary infrastructure to support them. The Gypsy and Traveller provision would create strain on the local community which cannot sustain this level of growth in the population.
- 2.1.11 Of particular concern was the impact on the small village school. People fear a disproportionate intake of Gypsy and Traveller children would imbalance the school and create a strain on existing resources, changing the current high standards and ethos of the school. It is

strongly felt that a small school could not satisfactorily cope with the proposal.

2.1.12 There were concerns that the proposal would have an adverse impact on the character of Barkway, many respondents fearing that the historical setting and village life qualities they prize would be lost. The feeling is that the proposals will increasingly blight the area, many believing that the blighting has already started.

2.1.13 Respondents report fears that the existing network of country lanes passing through settlements are not best suited to coping with extra traffic from Gypsy and Traveller vehicles and the proposal will make the roads more dangerous and congested.

2.1.14 Some concerns were raised about a Gypsy and Traveller site increasing insurance premiums and an impact on fly tipping.

Breaking Established Planning Policies

2.1.15 Many respondents are concerned that the proposals will break the established planning policies which seek to limit development and protect and enhance the quality of the local environment. Many respondents believe that it is unfair and there is no justification to break with established policies to allow Gypsy and Traveller provision at Barkway.

Aircraft

2.1.16 Barkway is situated on the approach and take off and holding patterns for Luton and Stansted Airports – with a planned expansion at Stansted posing an increase in air traffic and noise levels. The sites are 0.8 miles from Barkway Airstrip and immediately under the landing and take-off circuits. The area is a very busy Visual Flying area, with a regular, busy level of low flying private aircraft as well as being a frequent practice area for Duxford Aerodrome, just 8 miles away.

2.1.17 Noise levels in mobile homes are much higher than in wood/brick built homes.

Lack of Local Demand for Gypsy and Traveller Accommodation.

2.1.18 Many respondents, state that Barkway is not on any route used by Gypsies and Travellers and there is no evidence of any demand for pitches in the local area.

Meeting Gypsy and Traveller Own Stated Needs

2.1.19 .Many respondents consider that a compelling fact is that the Gypsy Council believes that places such as Barkway are unsuitable and unviable locations for Gypsy and Traveller provision. The preference is for sites situated closer to larger urban areas, since they would afford access to the required amenities which are very limited or nonexistent in the case of Barkway.

Specific Comments NH72: London Road, Barkway.

Site Constraints

2.1.20 Many respondents highlight problems and issues with the land identified off London Road. A main concern is that access would be from narrow unlit country lanes without footpaths, which are highly unsuitable to provide a safe access to and from any Gypsy and Traveller site.

2.1.21 There are also concerns that the land is poorly drained and becomes waterlogged. Respondents report that there are no mains services available. The sloping land would make providing level areas difficult.

2.1.22 Many respondents referred to the unpalatable level of smell that originates from the nearby chicken sheds, stating the land is unsuitable for providing residential accommodation.

2.1.23 It is reported that the site forms part of a DEFRA/Natural England Environmental Stewardship and Countryside Stewardship agreement - programme designed to increase environmental and wildlife protection. The allocation of a site on land within these designated areas would result in grant repayment and the land being removed from the programmes, which would have a negative impact on the environment in this area and would be a loss to the local conservation initiative.

Impact on the landscape

2.1.24 The respondents note that large parts of the London Road land is highly visible when approaching Barkway along London Road or Buckland Road. There is little existing screening and the site would be intrusive in the landscape.

Impact on Existing Properties and Land Uses.

- 2.1.25 There are concerns that the land is overlooked by neighbouring properties and would impact on the qualities of walking local footpaths.
- 2.1.26 Respondents value the land for its wildlife and flora which they believe will be harmed by the proposal.

Specific Comments NH73: Buckland Road, Barkway

Site Constraints.

- 2.1.27 Many respondents highlight problems and issues with the land identified off Buckland Road. A main concern was that Buckland is a narrow, unlit country lane without footpaths. This lane is seen as highly unsuitable to provide a safe access to any Gypsy and Traveller site.
- 2.1.28 Many respondents referred to the unpalatable level of smell that originates from the adjacent chicken sheds, stating the land is unsuitable for providing residential accommodation.
- 2.1.29 There are also concerns that the land is poorly drained and becomes waterlogged. Respondents report that there are no mains services available and the sloping land would make providing a level area difficult.

Impact on the landscape

- 2.1.30 The respondents note that the Buckland Road land is open and slopes down towards Barkway and therefore is very exposed and visible from surrounding landscape. There is little existing screening.
- 2.1.31 Respondents clearly value the quality of the local landscape and consider this elevated and highly visible land to be a key feature. They are deeply concerned that the proposal would be a blot on the landscape and impact on the high value they place not only on the rural landscape but on the historical buildings and setting of Barkway.

Impact on Existing Properties and Land Uses.

- 2.1.32 There are concerns that the land is too close to several neighbouring properties and would result in overlooking. Respondents are also concerned that the existing qualities of walking local footpaths will be lost.
- 2.1.33 Respondents value the land for its wildlife and flora which they believe will be harmed by the proposal.

2.1.34 Some respondents believe the future of the neighbouring Poultry Farm would suffer from the proposal.

Conclusions On the Barkway Land Allocations

2.1.35 The consultations highlighted many shortcomings in the two land allocations identified as areas of search for future Gypsy and Traveller Accommodation in Barkway. In many ways the root of these shortcomings is due to Government advice that options for non Green Belt sites should be examined prior to Green Belt sites being considered. Within North Hertfordshire there is extensive Green Belt land around the major settlements, therefore the settlements outside the Green Belt tend to be the smaller more isolated, with fewer local facilities and services and poor public transport links. This is certainly the case with Barkway. Although the area was identified by the selection process followed by Scott Wilson, when considered on their own specific merits the Barkway locations have little to offer and fail to meet basic criteria. The community is too small and isolated to either provide Gypsies and Travellers the necessary facilities and services or to prevent the local community being overbalanced and stressed by the introduction of a Gypsy and Traveller community.

2.1.36 In addition there are serious problems and issues with the identified areas of search. On-site and off-site works can provide services, improve drainage, and attempt to screen the site, however, where the sites offer so little current potential the works required could become over extensive in nature and themselves increase, at least in the short term, the impact of any development. Some issues such as the narrow network of country lanes without footpaths could not be addressed other than securing an appropriate safe access to the development.

2.1.37 As a result of the shortcomings with the two locations identified at Barkway, Officers consider that neither location should go forward in the LDF process and should not be identified in the Preferred Options and Land Allocations document scheduled for Spring 2009.

2.2 Pirton: Site NH95: Land North of West Lane and Holwell Road.

- 2.2.1 Some 790 responses were received on the Pirton location. The responses showed strong objections to the proposal and raised comments on many aspects.
- 2.2.2 Pirton Parish Council made a presentation of the opposition to the proposals, at a NHDC Cabinet meeting. Pirton Parish Council also lodged a comprehensive response, firmly rejecting Pirton as a suitable location for Gypsy and Traveller accommodation. NHDC Officers were invited to a public meeting in Pirton, where the community was able to voice its opposition and put questions.
- 2.2.3 Holwell Parish Council also lodged its opposition to the Pirton land allocation as did Ickleford Parish Council.

Inadequate Local Facilities

- 2.2.4 Most respondents drew attention that the Pirton location goes against advice from Government and other bodies, that Gypsy and Traveller sites should be located where the fullest range of facilities can be accessed. Furthermore the proposal appears to be completely contrary to the views stated in the letter from the Gypsy Council which regards forcing Gypsies into areas where they do not want to be is tantamount to social suicide and a complete waste of public time and money. The Gypsy Council is reported to have concerns over sites on the outskirts of small villages where the established settled population may not be able to cope.

Healthcare

- 2.2.5 There is no Doctor's surgery in Pirton, the nearest is some 4 miles distant and the nearest hospital over 7 miles away.

Shops

- 2.2.6 There is a very limited range of goods available in the village with the nearest access to general shops and supermarkets in Hitchin, to which most residents have to travel for the full range of household goods.

Public Transport

- 2.2.7 Respondents report that the public transport system is limited and infrequent with the last bus into Hitchin at 2.33pm on weekdays and the last bus back at 6.30pm. There is no bus service on Sundays and Bank Holidays.
- 2.2.8 The lack of public transport is reported to create problems particularly for young people and those without access to a car. This impacts on

after school activities and accessing services in Hitchin and further afield.

Education

2.2.9 Pirton does have a Primary school. It is however a small village school. The 'Indicated Admission Number' per year is only 20, this figure coming from a measurement of workspace in the school. The 'Published Admission Number' already exceeds this at 21 per year. In short it is already the case that the existing children of Pirton and Holwell cannot all be guaranteed a place at the school with some village children being placed in Hitchin schools. It is strongly felt that it would be nonsensical to create further problems by adding extra demand upon the village school by the proposal.

Employment Opportunities

2.2.10 Respondents report very limited local employment opportunities.

Local Policing

2.2.11 Some respondents are concerned that there is a very limited police presence in the local area.

Lack of Local Demand and Inability to meet Gypsy and Travellers stated needs.

2.2.12 Many respondents to the Pirton proposal referred to a lack of facilities that are required for a successful Gypsy and Travellers site. This conflicts with Government advice in ODPM Circular 01/2006, and statements made by the Gypsy Council.

2.2.13 In addition many respondents believe there is little local evidence of Gypsies and Travellers wishing to stay in the area. Therefore any Pirton provision may not be fully used by the Gypsy and Traveller community.

Impact on The Local Community.

2.2.14 Of great concern was a feeling that the proposal was completely out of scale with the size of Pirton and the level of facilities available. Many people thought the village ill-equipped to take on a new community without the necessary infrastructure to support them. The Gypsy and Traveller provision proposed would place strains on the local community, which would find it hard to accommodate a new Gypsy and Traveller community.

2.2.15 Respondents clearly value the local school as a community asset and are concerned about the impact of the proposals on the small village school. An intake of children from a local Gypsy and Traveller site would seriously imbalance the small school and there is a strong

feeling that the small school could not satisfactorily cope with the proposal.

2.2.16 There were concerns that the proposal would have a general impact on the character of Pirton, and create a culture clash and therefore a lack of integration between the village community and the Gypsy and Traveller community. Respondents felt the proposals have already started to blight and down-value the area.

2.2.17 Respondents report that the extra traffic from Gypsy and Traveller vehicles will make the existing network of country lanes more congested and dangerous.

2.2.18 There is anxiety that a local Gypsy and Traveller site would increase anti-social behaviour and fly tipping.

Site Constraints

2.2.19 Respondents are concerned that the land identified has constraints that make it unsuitable for providing Gypsy and Traveller accommodation. Many report a former sewage plant within the land. The land is also reported to be poorly drained leading to the flooding and the ground becoming waterlogged.

2.2.20 There are major concerns about providing a suitable and safe access to and from any site as the roads are narrow. Many of the local roads have no footways which would make walking to and from the site particularly dangerous.

2.2.21 Local respondents report shortcomings in the existing water and sewage infrastructure and believe that the extra demand would be difficult and expensive to accommodate.

2.2.22 Respondents refer to the sloping nature of the site making it difficult to provide level areas without extensive earth works. They also report a lack a natural screening which makes the sloping land very visible.

2.2.23 The land is also over flown and affected by noise pollution from aircraft using the expanding Luton International Airport.

Impact on the Landscape

2.2.24 Respondents are very concerned about the adverse impact the proposal would have on the quality and value of the local landscape. The respondents consider the open sloping character of the land identified, which drops away from the settlement and has little natural screening, provides the open views from West Lane and Holwell Road. The proposal would be very obtrusive in the landscape from both local views and views from further afield.

2.2.25 Respondents comment on the closeness of the land identified to the Area of Outstanding Natural Beauty and the Pirton Conservation Area and the harm it would do to these designated areas.

Impact on Other Properties and Land Uses

2.2.26 Respondents are very concerned that the identified land is close to many existing residential properties and in particular there will be overlooking between properties on West Lane and Holwell Road and any Gypsy and Traveller site.

2.2.27 Some respondents raise concerns about placing a Gypsy and Traveller site close to an existing dog kennel business.

Pirton likely to become Green Belt

2.2.28 Many respondents state that a coming review of the current Green Belt is likely to propose extending the Green Belt to cover the Pirton area. Many people therefore feel that Pirton should be given the same protection as existing Green Belt areas and excluded as an area of initial search.

Breaking Established Planning Policies

2.2.29 Many respondents are concerned that allowing Gypsy and Traveller provision at Pirton would break the established planning policies which seek to limit development and protect and enhance the quality of the local environment. Many respondents believe that it is totally unfair and unjustified to break with established policies to allow Gypsy and Traveller provision at Pirton.

Errors In Scott Wilsons' Assessment of Pirton

2.2.30 Apart from factual errors in the Scott Wilson Report, respondents firmly believe that they got the assessment wrong. The topography of the land, the level of overlooking from properties and the road, should all have been Rank 3 (the lowest), which would have led to the location being rejected from the final list of nine sites.

Conclusions On the Pirton Land Allocation

- 2.2.31 *The consultations have highlighted the shortcomings in the land allocations identified at Pirton as an area of search for future Gypsy and Traveller Accommodation. Again the root of these shortcomings is due to the fact that Government advice is that the options for non Green Belt sites should be examined prior to Green Belt sites being considered. Within North Hertfordshire there is extensive Green Belt land around the major settlements, therefore the settlements outside the Green Belt tend to be the smaller, more isolated ones, with fewer local facilities and services and poor public transport links. This is certainly the case with Pirton. Although the area was identified by the selection process followed by Scott Wilson, when considered on its own merit the Pirton location has very little to offer and fails to meet basic criteria. The community is too small and isolated to either provide Gypsies and Travellers with the necessary facilities and services or to prevent the local community becoming imbalanced by a new Gypsy and Traveller community.*
- 2.2.32 *In addition there are serious problems and issues with the identified area of search. On-site and off-site works can provide services, improve drainage, and attempt to screen the site. However, where the site offers so little potential, the works may become extensive and themselves increase, at least in the short term, the impact of any development. Some issues such as the narrow network of country lanes without footpaths could not be addressed other than by securing an appropriate safe access to the development.*
- 2.2.33 *As a result of the shortcomings with the location identified at Pirton, Officers consider that the location should not go forward in the LDF process and should not be identified in the Preferred Options and Land Allocations document scheduled for Spring 2009.*

2.3 Sandon: Site NH109: North of Paynes End.

Site NH112: Land south of Notley Green.

- 2.3.1 Some 580 responses were received on the two Sandon locations.
- 2.3.2 The responses showed strongly felt objections to the proposals and raised comments on many aspects of the proposal. Perhaps the strongest feeling is disbelief that such a small isolated community with few facilities and poor road access could be suggested as a suitable location for Gypsy and Traveller accommodation, particularly when the Gypsies and Travellers do not favour such locations. Sandon Action Group was formed.
- 2.3.3 Sandon Parish Council took the opportunity to present their opposition to the proposals to a Cabinet Meeting of North Hertfordshire District Council and made written representations. Reed, Therfield and Rushden & Wallington Parish Councils wrote objecting to the Sandon land allocations.
- 2.3.4 Two areas of search have been identified close to the Sandon community *NH109: North of Paynes End* and *NH112: Land south of Notley Green*. Many of the objections or points made by respondents are common to both locations, therefore a single summary is provided. Where the comment is specific to one site they are summarised separately. A combined Officer response is made for both the Sandon locations.

Comments Common to both Sandon Sites NH109 and NH112

Inadequate Local Facilities

- 2.3.5 Most respondents draw attention to the advice from Government and other bodies that Gypsy and Traveller sites should be located where the fullest range of facilities can be accessed. Most respondents refer to the lack of such suitable facilities in the Sandon area.

Healthcare

- 2.3.4 There is no Doctor's surgery in Sandon, the nearest is some 6 miles distant.

Shops

- 2.3.5 There are no shops or pubs in the village, only a small Post Office which opens for a few hours each week.

Public Transport

2.3.6 Respondents report that the public transport system is pitiful, not reliable and limited to three buses a week.

Education

2.3.7 There is only a small 2 teacher primary school in Sandon which has limited places.

Employment Opportunities

2.3.8 Respondents report very limited local employment opportunities.

Impact on The Local Community.

2.3.9 Many people strongly thought that Sandon was a small and isolated community with which it would be impossible to successfully locate a Gypsy and Traveller site. With a population of only some 400, an influx of Gypsies and Travellers would imbalance and overwhelm the local community, particularly the small school.

2.3.10 Respondents consider Sandon as a small village, divided into 3 or 4 hamlets, any one of which would probably be not much bigger in population terms than the proposed gypsy site.

2.3.11 Many people considered the scale and form of the proposal would be out of character with the existing village and its listed buildings. The Gypsy and Traveller provision would create strain on the local community which cannot sustain this level of growth in the population.

2.3.12 There were also concerns about property values and a very limited police presence in the local area.

Lack of Local Demand and Inability to meet Gypsy and Travellers stated needs.

2.3.13 Many respondents to the Sandon proposals, referred to a lack of local facilities which are needed for a successful Gypsies and Travellers site. They strongly feel that the proposal conflicts with Government advice in ODPM Circular 01/2006 and statements made by the Gypsy Council.

2.3.14 In addition many respondents believe there is little local evidence of Gypsies and Travellers wishing to stay in the area, therefore any Sandon provision may be not fully used by the Gypsy and Traveller community.

Breaking Established Planning Policies

2.3.15 Many respondents are concerned that the proposals will break the established planning policies which seek to limit development and protect and enhance the quality of the local environment. Many respondents believe that it is unfair and there is no justification to break with established policies to allow Gypsy and Traveller provision at Sandon.

Site NH109: North of Paynes End, Sandon.

Site Constraints

2.3.16 Many respondents commented that the identified area of search was a poor location for providing a Gypsy and Traveller site. A main concern was that the area fronts on to a narrow country lane which is unlit and with no footpaths which would make the site dangerous to access by foot.

2.3.17 Many respondents referred to poor drainage of the location citing flooding and the land becoming waterlogged.

2.3.18 Respondents refer to the sloping nature of the site making it difficult to provide level areas without extensive earth works.

2.3.19 The land has no water, power or sewerage services.

2.3.20 A footpath runs through the Paynes End Site

Impact on the landscape

2.3.21 Many respondents were concerned that the proposal would have an adverse impact on the landscape, in particular it would be highly visible. It was felt that the open sloping nature of the land, with little existing natural screening, would mean the site would be very obtrusive.

Impact on Other Properties and Land Uses

2.3.22 Many respondents felt that the identified land was too close to existing properties and would result in unacceptable overlooking.

2.3.23 Respondents are also concerned about the impact of the proposal on local wildlife.

2.3.24 Many people considered the scale and form of the proposal would be out of character with the existing village and its listed buildings.

2.3.25 The proposal would impact on the qualities and enjoyment of the local footpath network.

NH112: Land South of Notley Green, Sandon.

Site constraints

2.3.26 Many respondents commented that the identified area of search was a poor location for providing a Gypsy and Traveller site. A main concern was that the area fronts onto a narrow country lane which is unlit and with no footpaths which would make the site dangerous to access by foot

2.3.27 Many respondents referred to poor drainage of the land citing flooding and the land becoming waterlogged.

2.3.28 A footpath runs beside the whole of the Notley Green site.

Impact on the landscape

2.3.29 Many respondents were concerned that the proposal would have an adverse impact on the landscape and in particular would be highly visible. It was felt that the open sloping nature of the land with little existing natural screening would mean the site would be very obtrusive.

Impact on Other Properties and Land Uses.

2.3.30 Many respondents felt that the identified land was too close to existing properties and would result in unacceptable overlooking.

2.3.31 Respondents refer to Tichney Wood as valued and ancient woodland which is next to the identified land. People believe this will be damaged by the proposal.

2.3.32 The area is reported to be rich in wildlife and the proposal will impact on an important wildlife corridor.

2.3.33 Natural England notes the proximity of this site to Blagrove Common SSSI, which is approximately 200m from the southern boundary of the site. Natural England is concerned that this site allocation may adversely impact on the SSSI, and also the adjacent County Wildlife Site 14/017 known as 'Tichney Wood.'

2.3.34 The proposal would impact on the qualities and enjoyment of the local footpath network.

Conclusions on the Sandon Land Allocations

2.3.35 The consultations highlighted many shortcomings in the two land allocations identified as areas of search for future Gypsy and Traveller Accommodation at Sandon. In many ways the root of these shortcomings is due to the fact that Government advice is that options for non Green Belt sites should be examined prior to Green Belt sites being considered. Within North Hertfordshire there is extensive Green Belt land around the major settlements, therefore the settlements outside the Green Belt tend to be smaller and more isolated, with fewer local facilities and services and poor public transport links. This is certainly the case with Sandon. Although the area was identified by the selection process followed by Scott Wilson, when considered on their own specific merits the Sandon locations have little to offer and fail to meet basic criteria. The community is too small and isolated to either provide Gypsies and Travellers the necessary facilities and services or to prevent the local community being overbalanced and stressed by the introduction of a Gypsy and Traveller community.

2.3.1 In addition there are serious problems and issues with the identified areas of search. On-site and off-site works can provide services, improve drainage, and attempt to screen the site, however, where the sites offer so little current potential the works required could become over extensive in nature and themselves increase, at least in the short term, the impact of any development. Some issues such as the narrow network of country lanes without footpaths could not be addressed other than by securing an appropriate safe access to the development.

2.3.2 As a result of the shortcomings with the two locations identified at Sandon, Officers consider that neither location should go forward in the LDF process and should not be identified in the Preferred Options and Land Allocations document scheduled for Spring 2009.

2.4 Whitwell: Site NH16: West of The Bury, Lilley Bottom Road, (St Paul's Walden Parish).

2.2.34 Some 350 responses were received on the Whitwell location. The letters showed strongly felt objections to the proposals and raised comments on many aspects of the proposal. St Paul's Walden Parish Council also made a presentation of the opposition to the proposals, at a NHDC Cabinet meeting.

2.2.35 NHDC Officers were invited to a village meeting in Whitwell where the community was able to voice its opposition and ask questions. Both Kings Walden Parish Council and St Paul's Walden made representations objecting to proposals for Whitwell.

Impact on the Local Community

2.4.1 Many respondents were very concerned about the adverse impact Gypsy and Traveller accommodation would have on the village and local area. A common concern was that Whitwell is a small close knit community, approached from every direction by narrow twisting rural roads. The High Street suffers considerably from on road parking, due to the nature of the dwellings (no garages). Congestion and disruption to the flow of two way traffic is regularly experienced and would be greatly aggravated by increased usage by towed caravans, vans and lorries such as commonly used by Gypsies and Travellers. Some respondents were worried that an increase in anti-social behaviour and cold-calling would combine with a devaluing of property prices. Given the small size of the community many thought that the proposal was out of scale with the local area. Fears were expressed that an influx of Gypsy and Travellers would stretch limited local facilities and services and create an imbalance in the community making successful integration difficult.

Location in the landscape

2.4.2 Many respondents believed that the local area is one of the most beautiful parts of North Hertfordshire and contest Scott Wilson's assessment of the landscape character being described as poor/moderate, whereas it could be better described as at least good.

2.4.3 Respondents saw the proposal as a "blot on the landscape". The sloping location has little screening and is highly visible from the surrounding area. There would be a loss of farmland and some woodland and an impact on local wildlife. There was also wide concern

that the proposal would have an adverse impact on qualities of the River Mimram.

Site Constraints

- 2.4.4 Many respondents identified what they saw as serious site constraints.
- 2.4.5 Many do not believe there is a suitable safe access point to the location. The roads are narrow and busy leading to periods of congestion.
- 2.4.6 There are many concerns regarding the local gas infrastructure. It is reported that there are high pressure gas pipelines running through part of the location which have a 70 yard exclusion zone around them. The location is also close to a Gas Transmission Site, reported to be one of the largest in England. During the 1960s the village was evacuated due to the likelihood of a huge explosion at the site. A smaller incident in the last few years caused the evacuation of the more local houses. The site is also crossed by powerlines.
- 2.4.7 Aircraft noise from the existing and expanding Luton International Airport is a major local problem which would impact on the location.
- 2.4.8 The site conditions are reported to result in poor drainage and ground becoming waterlogged.

Inadequate Local Facilities

- 2.4.9 Many respondents draw attention to the advice from Government and other bodies that Gypsy and Traveller sites should be located where the fullest range of facilities can be accessed. Many respondents relate the limited suitable facilities and lack of spare capacity serving Whitwell.
- 2.4.10 The local school is small and would probably struggle to accommodate a high level of new pupils. The senior schools in the area would also struggle. Extra bus services for the schools would have to be laid on causing more congestion and traffic, again putting stress on both the current residents and possible new residents.
- 2.4.11 The doctors' surgery is small and would struggle to meet extra demands. Emergency services (Fire Ambulance and Police) struggle to meet any reasonable response times.
- 2.4.12 Local shopping is limited to one small village shop.

Impact on nearby land uses and properties.

- 2.4.13 Many respondents were concerned that the location is close by residential properties with the potential for over looking.
- 2.4.14 There is common concern about the impact on the River Mimram and the long established watercress beds that neighbour the location.
- 2.4.15 The Sanson family have made responses detailing that the family have farmed Watercress at Nine Wells in much the same manner as it has been for over one hundred and fifty years. The watercress is hand cultivated and grows in special watercress beds which rely on the purest spring water which runs from the River Mimram and from underground springs directly into the farm. The defining factor of Nine Wells' Watercress is its purity and quality which is completely dependant upon the purity of the water which runs through the watercress beds. A portion of the proposed Gypsy & Travellers Site is situated on land which is elevated and descends in gradient directly into the watercress beds, via the vegetable plots (also forming an integral part of our family business). The exact scale of the proposed site is as yet unquantifiable but there could be a significant number of individuals, families, caravans, and water and sewerage systems on the land which sits directly above watercress beds. In these circumstances, there will undoubtedly be a possible run-off of pollution into the water system which may ultimately jeopardise the ability to carry on the business of producing 'pure' watercress, which has been family operated for over 150 years. It may also detrimentally impact on the trout lake side of the business for similar reasons.

Breaking Established Planning Policies.

- 2.4.16 Many respondents draw attention to existing policies that seek to restrict development and protect and enhance the local area. They question why these policies should be put aside to provide Gypsy and Traveller accommodation.

Whitwell likely to become Green Belt

- 2.4.17 Given that the Scott Wilson study largely excluded all current Green Belt locations, many respondents commented that as Whitwell was now proposed to become Green Belt this allocation should also be excluded as an appropriate area of search.

Conclusions On the Whitwell Land Allocation

- 2.4.18 *The consultations have highlighted many shortcomings in the land allocation identified at Whitwell as an area of search for future Gypsy and Traveller Accommodation. Once again the root of these shortcomings can be found stemming from Government advice that the options for non Green Belt sites should be examined prior to Green Belt sites being considered. Within North Hertfordshire there is extensive Green Belt land around the major settlements, therefore the settlements outside the Green Belt tend to be smaller and more isolated, with fewer local facilities and services and poor public transport links. This is certainly the case with Whitwell. Although the area was identified by the selection process followed by Scott Wilson, when considered on its own merit the Whitwell location has little to offer and fails to meet the basic criteria. The community is too small and isolated to either provide Gypsies and Travellers the necessary facilities and services or to prevent the local community becoming imbalanced and stressed by a Gypsy and Traveller community.*
- 2.4.19 *In addition there are serious problems and issues with the identified area of search. On-site and off-site works can provide services, improve drainage, and attempt to screen the site, however, where the site offer so little current potential, the works required become over extensive and themselves increase, at least in the short term, the impact of any development. Some issues such as the narrow network of country lanes without footpaths could not be addressed other than perhaps by securing an appropriate safe access to the development.*
- 2.4.20 *As a result of the shortcomings with the location identified at Whitwell, Officers consider that the Whitwell location should not go forward in the LDF process and should not be identified in the Preferred Options and Land Allocations document scheduled for Spring 2009.*

Appendix A: List of documents related to Gypsy and Traveller

Provision and a Time Chart of the process

Provision and a Time Chart of the process

2006	Office of the Deputy Prime Minister Circular 01/2006	Para.23 The Regional Spatial Strategy must set down a requirement of pitches each local authority should provide.
June 2006	Northern and East Hertfordshire: Gypsy and Traveller Accommodation Assessment OCR	The report concluded that 45 extra pitches were required by 2011 across the five Councils of Broxbourne, East Herts, North Herts, Stevenage and Welwyn Hatfield.
March 2007	Proposed Changes to East of England Plan	Policy H4 Interim position for Local Authorities to make provision to meet the identified local needs. EERA to have an early review of the Regional Spatial Strategy to provide framework for provision and identify pitch requirement at district level.
May 2007	EERA single issue consultation	Option 1 North Herts. 3 pitches Option2 North Herts. 15 pitches
January 2007	Scott Wilson: Site Selection Criteria Report	Consultant providing independent advice Northern and East Hertfordshire local authorities sets down criteria for site selection
October 2007	Scott Wilson Report	Identifies 9 possible locations of search for Gypsy and Traveller provision in North Herts, as part of wider provision in Northern and East Hertfordshire. Barkway (2) Sandon (2) Pirton, Whitwell, Ashwell, Kings Walden and Reed.
November 2007	SNAP DPD Issues and Options	Start of an eleven week consultation which includes four possible locations for Gypsy and Traveller provision. North Herts (2), Stevenage (2).
December 2007	North Hertfordshire District Council	Decide to carry 6 possible locations forward into the Land Allocations Issues and Options Paper. Barkway (2) Sandon (2) Pirton and Whitwell
Jan 2008	North Hertfordshire District Council: Land Allocations DPD Issues and Options Paper.	Start of an eight week consultation which includes six possible land allocations for Gypsy and Traveller provision. Barkway (2) Sandon (2) Pirton and Whitwell
February 2008	EERA Single Issue Review : Planning for Gypsy and Traveller Accommodation Draft Policy submitted to Sec of State	Start of a 12 week public consultation. Requirement for North Herts. set at 6 existing pitches and 15 extra pitches to 2006-2011
24 June 2008	North Hertfordshire District Council Cabinet	Report presented report on the responses received on the Gypsy and Traveller accommodation in the Land Allocations Issues and Options Paper
Spring 2009	SNAP DPD - Preferred Options	Public consultation. Six week period for objections and comments to be received
Spring 2009	NHDC Land Allocations DPD - Preferred Options	Public Consultation. Six week period for objections and comments to be received
Spring 2011	NHDC SNAP Public Examinations	
Summer 2011	NHDC Adoption of Policies and Land Allocations	

Appendix B

North Hertfordshire District Council's response to the EERA Single Issue Review Consultation – Planning for Gypsy and Traveller accommodation in the East of England.

1. NHDC **supports**, in Proposed Draft Policy H4, the broad principle of promoting pitch provision as part of new major developments and through the preparation of Local Development Documents. It specifically supports the following wording in Proposed Draft Policy H4, namely: "Local authorities should seek to achieve levels of provision required by 2011 as soon as possible through the development control process particularly when opportunities present themselves in respect of new major developments.....". Notwithstanding points made below, this wording makes sound sense in growth areas where planned development can be successfully integrated into a new community that will be developed together.
2. NHDC **supports** the aspect of Proposed Draft Policy H4 that advocates the use of evidence from up to date Gypsy and Traveller Accommodation Assessments (GTAAAs) for provision beyond 2011.
3. NHDC **objects** to the use of an annual 3% increase in the level of overall pitch provision beyond 2011. This has been selected on what would appear to be an arbitrary basis. Needs for the provision of pitches beyond 2011 should be based on needs related evidence included in up to date GTAAAs.
4. NHDC **objects** to the removal of the following words from the existing RSS Policy H4 which is proposed for deletion, namely: "Local authorities should make provision for sites/pitches to meet the identified needs of Gypsies and Travellers **living in or resorting to their area**". This wording is considered essential to the success of future site provision, as in recent years, many sites located in areas where Gypsy families did not want to be, have closed in different parts of the country. The wording of current RSS Policy H4, quoted above, should be retained in the Proposed Draft Policy H4.
5. NHDC **objects** to the level of provision in North Herts, as this is contrary to evidence in EERA's own report, where the need has been identified as (a maximum of) 3 additional pitches in the District but, bizarrely, the allocation is 500% higher - at 15 pitches. This conflicts with the sensible and logical direction of the original wording of RSS Policy H4 (quoted in 4. above).
6. NHDC **objects** to the figure of 15 additional pitches required, 2006-2011, for North Herts. The number of additional pitches should match the identified need in the district (based on EERA's own assessment) and therefore should be reduced to 3, with the Proposed Pitches at 2011 being amended to 9.
7. In paragraph 5.15 of the Single Issue Review, it states that "Policy H4 seeks to meet the pressing needs of additional provision of residential pitches for Gypsy and Traveller Caravans that are evident in the East of England". While this is understandable, it must be made in the areas where Gypsies and Travellers wish to

live, as this would then accord with ... "The level of provision to be made **reflects the needs of those currently resident in the East of England**....." The needs referred to here includes the need to be in a certain locality, and certainly not in areas where Gypsies and Travellers do not resort to or have any wish to reside in.

8. It seems a rather patronising and inequitable stance for EERA to propose a policy that does not attempt to satisfy the genuine 'local needs' of Gypsies and Travellers. In the settled community, the objective is that people in need of affordable housing have their needs met locally, near where they are currently living or employment areas. Departing from this local need satisfaction for Gypsy and Traveller accommodation, by arbitrarily manipulating the provision away from where the need has been identified by EERA, does not seem to be in the interests of the Gypsy and Traveller community.

9. In paragraph 5.17 of the Single Issue Review, it states that "...Such policies should ensure that there is reasonable scope for identification of sufficient sites to be delivering the level of pitches identified in Policy H4 '**in locations which are likely to be attractive to the local Gypsy and Traveller community**'..... This is of paramount importance to the satisfaction of the needs of the Gypsies and Travellers and to avoid unnecessary expenditure on site identification and provision which may prove to be ill-conceived with sites being unused because they have been located in areas where the Gypsy and Traveller community do not wish to live.

10. The approach to distribution of pitches across the region in Proposed Draft Policy H4 is flawed as it is not an exercise in satisfying the local needs of Gypsies and Travellers based on robust evidence or a true spatial strategy, but is quite simply a numerical distribution approach. To make this worse this flaw is perpetuated by the 3% per annum growth figure.

11. Bearing in mind the comments from the Gypsy Council in relation to "some 40 sites in different parts of the country that have closed simply because they have been located in parts of the country where the Gypsy families for whom they were provided did not want to be" the arbitrary strategy now being adopted by EERA, without a sound evidence base to support why the provision of pitches should be made in areas "where previously little provision has been made" (paragraph 5.16 of the Single Issue Review), defies sound logic.

12. In the absence of GTAAs in the region beyond 2011, arbitrary growth rates of 3% should not be used to extrapolate pitch rates beyond 2011, as this would exacerbate the well founded concerns relating to the robustness of district level figures and whether the short term spatial strategy for the period was still correct for the longer term. In these circumstances, the correct approach is considered to be the provision of pitch figures to 2011 with a commitment to then carry out a new round of GTAAs looking forward in a consistent and co-ordinated basis across the region.

End