

**SOUTH CAMBRIDGESHIRE GYPSY AND TRAVELLER DEVELOPMENT PLAN
DOCUMENT (DPD) ISSUES AND OPTIONS REPORT 2: SITE OPTIONS AND
POLICIES AND LONGER TERM IMPLICATIONS**

To: Cabinet

Date: 29 September 2009

From: Corporate Director, Finance, Property and Performance
Executive Director, Environment Services

Electoral division(s): Bar Hill, Bassingbourn, Bourn, Cottenham, Histon and
Impington, Fulbourn, Melbourn, Papworth and Swavesey,
Sawston, Waterbeach and Willingham and more generally
countywide.

Forward Plan ref: N/a **Key decision:** No

Purpose: To consider the South Cambridgeshire Gypsy and
Traveller Issues and Options consultation document and
the implications for County Council owned sites

Recommendation:

- i. Cabinet agrees the draft County Council
response to South Cambridgeshire Gypsy and
Traveller Development Plan Document
consultation.
- ii. Cabinet delegates to the Portfolio holders for
Growth Infrastructure and Strategic Planning
and Resources and Performance, in consultation
with the Executive Director: Environment
Services and the Corporate Director: Finance,
Property and Performance, the authority to
amend the draft response to enable a final
response to be submitted by the closing date of
9 October 2009.

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1.0 INTRODUCTION

- 1.1 South Cambridgeshire District Council (SCDC) has published its Gypsy and Traveller Development Plan Document (DPD) for consultation. This document sets out the scale and distribution of additional sites for Gypsies, Travellers and Travelling Showpeople within the District as well as potential options for policies to be used in the consideration of planning applications.
- 1.2 This report sets out a joint response from the Strategic Planning and Strategy and Estates teams. In addition, a number of other County Council services were contacted for their comments on the consultation document, including New Communities, Children and Young People's Services, Archaeology, Environment Policy and Projects, Countryside Access and Highways and these comments have been reflected in the proposed responses set out in this report.
- 1.3 The consultation was reported to a combined meeting of Growth and Environment Policy Development Group and Corporate Policy Development Group on 16 September 2009. Members at that meeting made a number of points on the consultation, including that:
- The overall figures for pitch numbers in South Cambridgeshire are too high, and they should be based on proven need.
 - The local view is that Spring Lane in Bassingbourn is completely inappropriate, especially as there is evidence that the site floods regularly, and there is no suitable access for emergency vehicles. In addition, the demand from traveller communities for this site is questioned.
 - There is opposition to the Meldreth site on the grounds that it is not feasible to mix showpeople communities with other travellers groups.
 - Whaddon Parish Council, the warden and residents of the existing site are all comfortable with the proposals for the expansion of pitches on that site, but Whaddon Parish Council opposes the Bassingbourn proposal.
 - Other options for site provision should be looked at, including privately owned sites, or arrangements for a third party (e.g. a registered social landlord) to run sites.
 - The location of traveller sites will always be a contentious issue with local communities, and it is vital to have open communication and debate with communities to ensure that they are fully informed.
 - There should be a preference for small sites, and safety considerations should be paramount.

2.0 BACKGROUND

- 2.1 In accordance with Planning Circulars 01/06 and 04/07 South Cambridgeshire District Council is required to set criteria for the location of Gypsy and Traveller and Travelling Showpeople sites and allocate land within their area for the number of pitches and plots identified in the East of England Plan.
- 2.2 The revision to the East of England Plan was published in July 2009 and sets out the number of additional Gypsy and Traveller pitches (both residential and transit) and Travelling Showpeople plots which South Cambridgeshire District is required to identify as part of their DPD.

- 2.3 The East of England Plan requires at least 127 new permanent pitches to be provided in South Cambridgeshire between 2006 and 2021 which includes an allowance for future household growth beyond 2011. It is important to note that the County Council previously accepted the scale of residential pitch provision within South Cambridgeshire District Council when responding to the consultation on the Government's proposed changes to the Regional Policy in May 2009. The effect of the regional policy is to distribute provision more widely through the region and reduce the numbers that would have to be provided in parts of Cambridgeshire from the levels suggested by Gypsy and Traveller Needs Assessment.
- 2.4 The publication of this Issues and Options document follows earlier consultation in October 2006 relating to the general approach for identifying additional Gypsy and Traveller sites. When adopted, it will form part of the Development Plan for South Cambridgeshire District.
- 2.5 A copy of all the relevant consultation documents can be viewed at:

http://www.scambs.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/Gypsy_and_Traveller_DPD.htm

These documents include two technical annexes with details of the site assessment process that the District Council used in preparing the DPD.

- 2.6 In preparation for the formal consultation, details of the County Council's property portfolio were shared with the District Council in the spirit of openness and joint working. The views of County Council officers were also sought in relation to transport, education and archaeological matters arising from possible sites. The feedback received from County Council officers has been used in the preparation of the consultation document.
- 2.7 A large number of sites were initially considered, 60 of which were on County Council property.
- 2.8 The District Council then adopted a sieving process using three different tiers examining:
- Location and key constraints.
 - Infrastructure.
 - Impact on surrounding land uses, local facilities and prospects for delivery.
- 2.10 Following this process, 20 sites have been carried through to the current consultation for Gypsy and Traveller provision, with additional provision for transit pitches (one site) and Travelling Showpeople plots (one site). Of these sites, three are on County Council property and are under active consideration as part of this consultation. These are:
- Land at Spring Lane, Bassingbourn – new site for Gypsy and Traveller provision.
 - New Farm, Old North Road, Whaddon – expansion of existing site for Gypsy and Traveller provision
 - Blackwell site, near Milton, Cambridge – existing site of residential

pitches proposed to be used for transit purposes.

- 2.11 The District Council has confirmed in the consultation document that the County Council is being consulted and its views as landowner will be specifically sought. Other public landowners were also contacted with regard to the availability of land, but no site options were identified.
- 2.12 The consultation also includes a number of 'rejected options' that were removed from consideration in the later stages of the sieving process. The District Council is seeking views on the appropriateness of their rejection as sites for Gypsy and Traveller provision. In addition to the three County Council sites listed above, the Council also owns sites at Willingham and Meldreth – both now closed. These are included in the list of rejected options.
- 2.13 It should be noted that since the consultation began, new information has been provided to local authorities from the Environment Agency relating to areas susceptible to surface water flooding (July 2009). Where this affects the proposed sites set out in the DPD, this has been highlighted in the responses below, and it is suggested that the District Council seek further advice from the Environment Agency about the implications of this new information.

3.0 SUMMARY OF PROPOSALS BY SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

- 3.1 The Issues and Options consultation document proposes that 88 additional residential Gypsy and Traveller pitches be developed by 2021. This takes into account the number of Gypsy and Traveller pitches which have been developed since 2006 and those which have planning permission.
- 3.2 Having assessed land against the sieving process outlined above, twenty sites have been identified by the District Council for additional pitches and plots within South Cambridgeshire, comprising:
- Sites which currently have temporary planning permission.
 - One site which is currently unauthorised.
 - New sites on private land.
 - Major Development sites.
 - Two sites which are in the County Council's ownership.
- 3.3 The majority of pitch provision is proposed on sites with temporary planning consent or as part of the major development sites already identified in South Cambridgeshire's Local Development Framework. New or expanded sites make up a small proportion of the total.
- 3.4 In addition to these 20 sites, one site has been identified for 10 transit pitches (on County Council property) and a further site is proposed for 6 Travelling Showpeople plots.

4.0 KEY ISSUES & ASSESSMENT

- 4.1 South Cambridgeshire's consultation seeks views on a number of different questions and options. These are dealt with in this section of the report under

the following headings:

- Vision and objectives
- Potential sources of land for new sites
- Site options for consultation – by type and ownership
- Proposed policies for inclusion in the Development Plan Document
- Rejected site options
- Monitoring of the DPD.

Additional commentary is also provided on the financial implications for the County Council of managing existing sites.

- 4.2 Suggested responses are given in italics under each heading. Site numbers are those used in the consultation document.

Vision and objectives (Questions 1 and 2)

- 4.3 The consultation sets out a vision for the Gypsy and Traveller DPD and five objectives are also listed to achieve the vision.

Suggested County Council response:

Cambridgeshire County Council generally supports the vision set out in the draft Gypsy and Traveller Development Plan Document. The provision of carefully planned and managed sites will be key to reducing incidences of illegal and unplanned travelling encampments and developments as well as minimising impacts on neighbouring communities.

*However the vision could be strengthened by adding reference to climate change and the availability of infrastructure, so that it reads: “To address the full range of land-use and planning issues, including sustainability, **climate change mitigation and adaptation, the availability of existing and planned infrastructure** and good design, that need to be taken into account regarding Gypsy and Traveller sites and Travelling Showpeople sites”.*

Potential sources of land for new sites (Question 3)

- 4.4 At previous stages in the DPD’s preparation, the District Council issued a general request for any respondents – including private landowners and public bodies - to highlight land within the District that might be suitable and available for Gypsy and Traveller provision. This question is repeated in this consultation.

Suggested County Council response:

The County Council is not aware of any new sites, beyond those already considered, that may be suitable for Gypsy and Traveller provision.

SITE OPTIONS FOR CONSULTATION

Residential Pitch provision (Sites 1, 2, 9 -17 and 19)

- 4.5 It is proposed to develop additional residential Gypsy and Traveller pitches at the following locations:

- Sites which currently have temporary planning permission: Chesterton Fen Road area (45 pitches on two sites), Willingham area (10 pitches on six sites) and Swavesey area (8 pitches on one site)
- Site which is currently unauthorised: Willingham area (1 pitch)
- New sites on private land: Willingham area (3 pitches)

4.6 Children and Young People's Services have raised concerns regarding potential school capacity in relation to the proposed sites in the Willingham area and any further sites being developed in the Chesterton Fen area.

Suggested County Council response:

The County Council is not aware at this stage of any constraints that would prevent the allocation of the majority of the residential sites in the DPD, subject to the requirements of policy GT2 and the Development Control Policies Development Plan Document. Further assessment may be needed in the next stages of consultation and examination of the DPD, and if planning applications were to be submitted for these sites.

In relation to the proposed sites in Willingham area, the County Council as the Local Children's Services Authority, is currently experiencing pressure on primary school places in Willingham. As a result of this, a scheme to extend the primary school to provide a total of 420 places (two forms of entry (FE)) is currently underway in response to the existing pressures arising from house building and population growth. This is the County Council's preferred maximum size for a primary school. Additional sites for Gypsy and Traveller pitches in Willingham area would add to these pressures and the school might not be able to provide for the numbers of children involved. Given this, the County Council requests that the District Council contact the Authority to have further discussions in relation to the proposed inclusion of new pitches on private land in the Willingham area (Sites 11 and 14) given the apparent uncertainty about the availability of school places and any future funding.

In the case of the proposed sites in the Chesterton Fen area which currently have the benefit of temporary planning permission, the County Council would have significant concerns about any sites being located within this area in addition to those which are currently identified in the DPD. This is as a result of the local catchment primary school (Shirley Primary School) currently being at capacity in some year groups, and the further pressures being experienced across Cambridge City generally as a result of rising birth rates.

A number of these sites are subject to river flooding and/or include areas susceptible to surface water flooding based upon the latest information produced by the Environment Agency. It is suggested that South Cambridgeshire District Council obtain further advice from the Agency about how these issues could be addressed if these sites are to be brought forward.

Residential Pitch provision at Major Development Sites (Sites 3 - 8)

4.7 It is proposed to develop additional residential Gypsy and Traveller pitches at the following major development areas:

- Land between Huntingdon Road and Histon Road (10 pitches)
- Land between Madingley Road and Huntingdon Road (University Site) (10 pitches)
- Ida Darwin Hospital, Fulbourn (5 pitches)
- Cambridge East (20 pitches)
- Northstowe (20 pitches)
- Cambourne (10 pitches)

Suggested County Council response:

The County Council is not aware at this stage of any constraints that would prevent the allocation of the majority of these sites in the DPD subject to the requirements of policy GT2 and the Development Control Policies Development Plan Document. Further assessment may be needed in the next stages of consultation and examination of the DPD, and also in the preparation of masterplans for these major development sites.

There is currently significant pressure in relation to secondary school places as a result of the planned development of the Cambourne new settlement. In addition, given that the precise location of the proposed Gypsy and Traveller site has yet to be determined, its relationship to the catchments for primary schools within this settlement is unclear.

The County Council, therefore, requests that the District Council should contact the Authority to have further discussions in relation to the proposed inclusion of the new pitches at Cambourne given the lack of existing secondary school capacity and the need for clarity to enable the County Council to assess the impacts on the capacity of existing and future primary school catchments.

A number of these sites are subject to river flooding and/or include areas susceptible to surface water flooding based upon the latest information produced by the Environment Agency (July 2009). It is recommended that South Cambridgeshire District Council obtain further advice from the Agency about how these issues could be addressed if these sites are to be brought forward.

Size and tenure of Gypsy and Traveller sites at Major Developments (Question 4 and Option 7)

- 4.8 Views are sought on an option which would require major development areas to provide a specific number of pitches and whether these should be developed as public or private sites or a mixture of both.

Suggested County Council response:

Cambridgeshire County Council supports Option 7 – that major developments should be required to provide specific numbers of pitches, as it would provide greater certainty in relation to the numbers required within Major Development areas and elsewhere in the District.

The locally available evidence provided by Cambridge Sub Region Travellers' Needs Assessment (TNA), indicates that there is likely to be a need to provide for those within the Gypsy and Traveller community who are unable to

develop their own sites. Given that this is the case, it is therefore suggested that a proportion of sites at major developments should be developed as public sites dependant upon the likely level of need within South Cambridgeshire District.

Further guidance on this issue in the South Cambridgeshire District Gypsy and Traveller Development Plan Document would be beneficial to enable delivery of these sites.

Residential sites proposed on land in the County Council's ownership (Sites 18 and 20)

- 4.9 Two sites are proposed within the County Council's ownership for the development of additional residential pitches. The first of which relates to a new site on an agricultural holding at Spring Lane for 5 pitches to the south east of the village of Bassingbourn.
- 4.10 It is also proposed to extend by 2 pitches the existing New Farm Travellers' site which is on land owned by the County Council along side the A1198 near to Bassingbourn Barracks, Old North Road, Whaddon. This is a site of 14 pitches which is currently managed by the District Council on behalf of the County Council.

• Land at Spring Lane, Bassingbourn (Site 18)

- 4.11 No representations have been received directly from the farming tenant on the land at Bassingbourn and in any event the terms of the tenancy agreement enable possession to be regained. No objection is raised from a property perspective by Strategy and Estates on this site. Similarly no other objections have been made by County Council officers in relation to highway matters including Rights of Way and ecological and archaeological impacts, subject to the comments relating to policies GT1 and GT2 set out below. However concerns have been raised by Children and Young People's Services about the inclusion of this site, due to the lack of existing and future primary school capacity as suggested in the current school place forecasts.
- 4.12 The Environment's Agency latest map identifies this site as an area susceptible to surface water flooding.
- 4.13 Representations have been received from the local member for Bassingbourn, Cllr Linda Oliver, who disagrees with the assessment made by the District Council for the following reasons:
- Spring Lane is a dead end and is narrow which would prevent refuse collection and emergency vehicles accessing the site.
 - Significant costs to provide new site in relation to provision of utilities, flood prevention measures, utilities, archaeological works and transport improvements, including sight lines and realignment / widening of existing road.
 - Lack of employment opportunities in Bassingbourn and its immediate surroundings.
 - Local primary school is currently at capacity with the exception of the reception class.

- Materially changes the environment of Spring Lane characterised by Country Lanes as set out in South Cambridgeshire LDF.
- Impact upon biodiversity of the area around Spring Lane.
- No indication that the current tenant farmer would wish to relinquish their use of this land.

Suggested County Council response:

As the Bassingbourn Primary School is potentially facing rising school rolls and is at capacity for certain age groups the County Council requests that the District Council contact the Authority to have further discussions in relation to the proposed inclusion of the new pitches at Spring Lane, Bassingbourn given the apparent uncertainty about the availability of school places and any future funding.

This site is also susceptible to surface water flooding based upon the latest information produced by the Environment Agency (July 2009). It is recommended that South Cambridgeshire District Council obtain further advice from the Agency about the flooding issues affecting this site.

- New Farm, Old North Road, Whaddon (Site 20)

- 4.14 This site and the proposed area for expansion to the rear at Whaddon is owned and occupied by the County Council. No objection is raised from a property perspective by Strategy and Estates on this site. No objections have been made by County Council officers in relation to highway matters including Rights of Way, school capacity and ecological and archaeological impacts subject to the comments relating to policy GT2 set out below.

Suggested County Council response:

The site at New Farm, Old North Road, Whaddon is within an area susceptible to surface water flooding based upon the latest information produced by the Environment Agency (July 2009). It is recommended that South Cambridgeshire District Council obtain further advice from the Agency about how this issue could be addressed if this site is to be brought forward.

The County Council is not aware at this stage of any other constraints that would prevent the allocation of this site in the DPD. Further assessment may be needed in the next stages of consultation and examination of the DPD, and if a planning application was to be submitted for this site.

Transit Pitch Provision (Site 21)

- 4.15 Transit pitches are temporary stop-off sites used by Gypsy and Travellers who are passing through an area. There is currently no transit provision in Cambridgeshire. Policy H3 of the East of England Plan requires the Cambridgeshire and Peterborough Authorities to work together to develop 40 additional transit pitches by 2011. In advance of this joint work, the District Council has proposed that the existing Blackwell site, near Milton, close to Cambridge City but separated from it by the A14, should be redeveloped to become a transit site for 10 pitches.

- 4.16 This site, which is in the County Council's ownership and managed by the District Council, was originally developed as a transit site in 1988 but is currently used as a residential site for 30 pitches.

Suggested County Council response:

The County Council has no objection to the change in use of the Blackwell site, near Milton, from residential to transit provision and no objection is raised from a property perspective by Strategy and Estates. However, redevelopment for transit provision would need to be carefully managed with the existing residents so that suitable alternative accommodation is agreed and made available before work is progressed further.

Travelling Showpeople Provision (Site 22)

- 4.17 Policy H4 of the East of England Plan requires the Cambridgeshire and Peterborough Authorities to work together to identify sufficient sites to provide 18 additional Travelling Showpeople plots by 2011. It is proposed that an additional 6 plots should be provided on an existing Travelling Showpeople site to the west of Meldreth village.

Suggested County Council response:

The County Council is not aware at this stage of any constraints that would prevent the allocation of this site in the DPD. Further assessment may be needed in the next stages of consultation and examination of the DPD, and if a planning application was to be submitted for this site.

This site is within an area susceptible to surface water flooding based upon the latest information produced by the Environment Agency (July 2009). It is recommended that South Cambridgeshire District Council obtain further advice from the Agency about how this issue could be addressed if the site is to be brought forward

Gypsy and Traveller sites in the Green Belt (Options 1, 2, 3 and 4)

- 4.18 It is proposed that if land is allocated in the Green Belt for additional Gypsy and Traveller sites, including the sites proposed in the Chesterton Fen Road area, it should remain in the Green Belt. The District Council considers that a Green Belt release to accommodate a Gypsy and Traveller site would not meet the requirement of exceptional circumstances as defined in Circular 01/06 to take land out of the Cambridge Green Belt.

Suggested County Council response:

Cambridgeshire County Council supports the view of the District Council that there is not sufficient justification as required by Circular 01/06 to release land in the Cambridge Green Belt should sites in Chesterton Fen or elsewhere in the District be used for Gypsy and Traveller provision. Retaining these sites within the Green Belt would help to prevent pressure for their redevelopment for alternative uses.

Proposed policies for inclusion in the Development Plan Document

- 4.19 In addition to the site options discussed above, the consultation proposes that three policies should be incorporated into the DPD that would be used to judge planning applications. These would be in addition to other relevant policies in the District's Local Development Framework.

Design and location of Gypsy and Traveller sites at Major Developments (Options 5 and 6)

- 4.20 It is proposed to include a separate policy relating to the criteria for identifying the location of additional Gypsy and Traveller pitches at Major Development Sites. This would require sites to have good access to services, adequate safety, security and privacy as well as safe road access from major roads.

Suggested County Council response:

Cambridgeshire County Council is supportive of the suggestion that there should be a specific policy relating to the development of additional Gypsy and Traveller sites as part of major development sites.

Sites for Gypsies, Travellers and Travelling Showpeople on Unallocated Land Outside Development Frameworks (Draft Policy GT1)

- 4.21 This policy would be applied to planning applications for Gypsy and Traveller sites that came forward in locations outside those identified in the DPD, on unallocated or 'windfall' sites. The policy states that there must be a clear established need that could not be met by an allocated site and sets out a list of criteria by which these applications would be judged.

Suggested County Council response:

The County Council supports the inclusion of a policy to assess planning applications from windfall sites. The County Council supports the criteria in the policy and the emphasis on a planned approach to providing sites, in preference to provision through windfall development. However reference should also be made to ecological as well landscape impacts, and that sites should not be located in Air Quality Management areas. It would also be helpful to include reference to Development Control Policy NE/11 on Flood Risk.

Design of sites for Gypsies, Travellers and Travelling Showpeople (Draft Policy GT2)

- 4.22 It is proposed to include a policy relating to the design of Gypsy and Traveller and Travelling Showpeople sites. This would apply to all planning applications, whether they were for sites allocated in the DPD or whether they came forward as 'windfall' schemes.

Suggested County Council response:

The County Council supports the inclusion of a policy to secure the highest standard of design in new developments. To enable this it is suggested that

additional criteria be added to Policy GT2 to cover energy and water conservation measures, as well as consideration of potential ecological impacts as part of planning applications e.g. preparation of an Ecological Assessment. Similarly the requirement to provide safe access for new sites should be amended to include equestrians (where appropriate) as well as pedestrians.

Rejected Site Options (Site R1 – R22)

- 4.23 In identifying sites for the DPD consultation, South Cambridgeshire undertook a sieving process which assessed sites against a number of factors. In addition to the sites discussed above, the consultation also presents 22 sites that were rejected by the District Council for a variety of reasons, including potential impacts on the Cambridge Green Belt, landscape, historic environment and existing infrastructure. Of these sites 12 are in the County Council's ownership including the former local authority sites at Meldreth and Willingham. Views are sought as to the appropriateness of their rejection.

Suggested County Council response:

The County Council supports the rejection of sites R1 - R22 through the District Council's tiered assessment process. The rejection of those sites on County Council property is supported by the Council as landowner.

Monitoring (Option 14)

- 4.24 It is proposed to monitor the performance of the Gypsy and Traveller DPD against a number of indicators relating to Gypsy and Traveller completions and unauthorised Gypsy and Traveller sites. However no indication is given of how additional Travelling Showpeople plots will be monitored.

Suggested County Council response:

For consistency with the requirements for monitoring set out in the East of England Plan, it is considered that there is a need for an additional indicator relating to the net changes in plots for Travelling Showpeople.

Existing County Council sites

- 4.25 County Traveller sites are intended to run on a cost neutral basis. However given site management charges, capital investment and ongoing maintenance costs, few sites break-even representing a potential liability for the Council. Some sites e.g. Milton and Whaddon need considerable investment (available from central government) to refurbish them and continue to make them fit for purpose.

5.0 CONCLUSIONS

- 5.1 Concerns over education capacity in relation to the sites at Willingham and Bassingbourn and Cambourne are emphasised in the proposed responses set out above. Since the consultation began, new information has become available from the Environment Agency in relation to surface water flooding and this has also been highlighted where relevant.

- 5.2 Regarding the general content of the DPD, it is suggested that amendments should be made to take account of a range of issues including further consideration of ecological as well as landscape impacts, energy and water conservation and air quality issues.

6. SIGNIFICANT IMPLICATIONS

Resources and Performance

- 6.1 The consultation document proposes that three sites in the County Council's ownership at Milton, Whaddon and Bassingbourn be developed to provide additional Gypsy and Traveller accommodation. This proposal would have both capital and ongoing revenue costs and may be replicated as other district councils develop their site specific DPDs which relate to additional Gypsy and Traveller pitches. This is therefore an opportune time to consider whether this Council wishes to continue with existing management arrangements of its Traveller sites, responsibility for their financial control, capital investment, management and ongoing liaison. The other options available to this Council include transfer of site ownership and / or management to a third party (e.g. a District Council or Registered Social Landlord). This is not a core County Council function and these options that could reduce the number of properties held by the Council will be explored by the Director of Finance, Property and Performance and will be the subject of a subsequent report.
- 6.2 In the case of the new site being proposed at Bassingbourn there is an alternative option and that is for development by a private individual. If this site is to be sold for development as a Gypsy and Traveller site by a third party, any sale would have to be considered against the County Council's established policy for the disposal of property assets at market value unless there is justifiable reason for a reduction.
- 6.3 It should be noted that financial issues are not directly relevant to the suitability of sites in planning terms. However, deliverability of any proposals will be an important consideration for their inclusion in the DPD. The District Council has undertaken a preliminary assessment of the relative costs of developing the proposed sites (set out in the DPD Technical Annex). However, more work will need to be undertaken as the DPD is finalised, and if planning applications were to be prepared for any of the allocated sites.

Climate Change

- 6.4 There are no significant climate change and environmental implications in relation to the proposed consultation response. The response set out above has suggested highlighting ecological impacts and climate change mitigation and adaption. The climate change implications of any new development will be considered as part of the next stage in the DPD and subsequently as part of the planning application process.

Access and Inclusion

- 6.5 The Council's Single Equality Strategy sets out the commitments the County Council makes to all residents to ensure equality and diversity issues are

addressed. The Council aims to listen and be responsive to the needs of our communities through community engagement and promote respect and strengthen communities and encourage exchanges of cultures. The county is very diverse with some areas being considerably more deprived than others. Narrowing the gap between these areas is a major priority as it is recognised that people from Gypsy/Roma and Irish Traveller heritage are not performing as well educationally. This is due to the fact that their communities tend to be rurally isolated and they are not able to access services as easily as other residents. Responding to the District Council's consultation on the DPD is one of the ways in which this can be addressed.

- 6.6 Issues of access and inclusion have been considered by the District Council during the site assessment process, including relationships of sites to nearby settlements, social and transport infrastructure, and access to local facilities. In responding to this consultation, the views of different services in the County Council have been sought as to access and inclusion and their comments have been reflected in the proposed responses set out in Section 4.

Statutory Duties / Requirements and Partnership Working

- 6.7 In accordance with Planning Circulars 01/06 and 04/07 South Cambridgeshire District Council is required to set criteria for the location of Gypsy and Traveller and Travelling Showpeople sites and allocate land within their area for the number of pitches and plots identified in the East of England Plan. These circulars require Local Planning Authorities to consider the availability of public land as part of the process for identifying sites for Gypsy and Traveller pitches and Travelling Showpeople plots. The County Council as a landowner has the discretion to dispose of land for less than best consideration where it will secure the promotion of improvement of the economic, social and environmental well being of the area. As outlined in paragraph 2.6 above, the County Council has shared details of its property portfolio with the District Council in the preparation of the DPD, in the spirit of openness and partnership working.

Engagement and Consultation

- 6.8 The County Council is responding to the consultation on this document being undertaken by South Cambridgeshire District Council. There will be a further period of consultation in 2010, followed by an independent examination in 2011, where the County Council will have further opportunities to respond.

Source Documents	Location
<ul style="list-style-type: none"> • South Cambridgeshire District Gypsy and Traveller Development Plan Document Issues and Options 2 Site Options and Policies (July 2009) • South Cambridgeshire District Gypsy and Traveller Development Plan Document 2 Technical Annex • Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England (July 2009) • Areas Susceptible to Surface Water Flooding: Advice to Local Planning Authorities (July 2009) • South Cambridgeshire Development Control Policies Development Plan Document (July 2007) • Cambridge Sub-Region Travellers Needs Assessment (ARU and Bucks Chiltern College, May 2006) 	A Wing 2 nd Floor, Castle Court, Cambridge

