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# East Devon Gypsy and Traveller Site Design and Layout Supplementary Planning Document



Consultation Statement

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## Supplementary Planning Document

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### Consultation Statement

Prepared by Officers of East Devon District Council

[localplan@eastdevon.gov.uk](mailto:localplan@eastdevon.gov.uk)

Planning Policy, East Devon District Council, The Knowle, Station Road, Sidmouth, EX10 8HL

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#### 1.0 Introduction

- 1.1 This document explains how East Devon District Council has undertaken community consultation and stakeholder involvement to produce the Gypsy and Traveller Site Design and Layout Supplementary Planning Guidance (hereafter called SPD). It is a legal requirement for SPD to undergo public consultation<sup>1</sup>, to take account of any comments which are made and to produce this statement.
- 1.2 In producing Development Plan Documents (such as the East Devon Local Plan) the Council follows the **Statement of Community Involvement** <http://eastdevon.gov.uk/planning/planning-policy/policy-work-whats-new/work-programme-and-consultations/> which sets out who, how and when consultation will occur. This guidance is SPD, and so is not legally required to comply with the Statement of Community Involvement, however it is sensible and consistent to use it as a model process for this document to follow.

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<sup>1</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012, part 5

- 1.3 Consultation responses are usually made public and can be viewed on the Council’s website or at the main Council offices at Knowle. Comments may be summarised, or text redacted, where publication is considered discriminatory to Gypsies and/or Travellers.

## 2.0 The SPD process

- 2.1 The District Council commissioned a Gypsy and Traveller housing needs assessment (along with other Devon authorities) in 2014, which established the number of new pitches which were required in East Devon. Since then several sites have been granted permission, so at the current time, there is a need for 28 permanent pitches for gypsies and Travellers, 16 of which are needed in the next 3 years.
- 2.2 The Council has been working on a Plan for Gypsy and Traveller sites since Summer 2015 and originally intended to produce a Development Plan Document which would allocate sites for development and then contain guidance for detailed site design. Despite extensive ‘calls for sites’ and approaches to landowners and other stakeholders, a lack of sites coming forward has led to the deferment of the allocations element of the Plan. In the meantime, the Local Plan states that up to 30 pitches will be provided in a future expansion of Cranbrook, and several applications for small numbers of pitches elsewhere in the District have been received on an ad-hoc basis, so there is a need for detailed site design guidance, to be met through this SPD.

Production of the SPD consists of four main stages:

SPD Process stage	What is involved?
<b>Stage 1</b> Development of evidence base 	<ul style="list-style-type: none"> <li>• Identification of the issues and collection of the information needed to prepare the SPD</li> <li>• Engagement with relevant stakeholders to decide on content and level of detail of the SPD</li> </ul>
<b>Stage 2</b> Drafting of the SPD (Regulation 12 of Local Plan Regulations 2012) 	<ul style="list-style-type: none"> <li>• Drafting of SPD</li> <li>• Consultation with stakeholders and members of the public</li> <li>• Minimum of 4 weeks consultation</li> </ul>
<b>Stage 3</b> Finalisation of the SPD and supporting documents 	<ul style="list-style-type: none"> <li>• Formal consideration of points raised in Stage 2.</li> <li>• Amendment of the SPD as required and finalisation of the supporting documents in light of consultation.</li> <li>• Potentially further consultation</li> </ul>
<b>Stage 4</b> Adoption of SPD by the Council (Regulation 14 of local Plan Regulations 2012)	<ul style="list-style-type: none"> <li>• Report to Strategic Planning Committee (for ratification by Cabinet). If Cabinet agree, then EDDC can adopt the SPD and produce an Adoption Statement</li> </ul>

- 2.3 The initial work on the Development Plan document was informed by the following evidence:
- [RRR “Devon Partnership Gypsy and Traveller accommodation Assessment” \(2015\)](#)
  - [DCLG 'Designing Gypsy and Traveller Sites Good Practice \(2008\)'](#)
  - [DCLG 'Planning policy for traveller sites \(Aug 2015\)'](#)
  - Bi-annual Caravan Count figures
  - The Planning Inspectorate statistics and appeal decisions
  - Discussion with local Gypsies and Travellers
  - Discussions with Officers of Neighbouring Authorities and their published guidance and Policies
  - Meetings of the Teignbridge Traveller Forum

- Records of discussions with traveller community representatives including: Friends, Family and Travellers; Irish Travellers Movement in Britain and the UK Association of Gypsy Women
- Inequalities experienced by Gypsy and Traveller communities: a review (Equalities and Human Rights Commission)
- Report of the Local Government Association Gypsy and Traveller Task Group
- Information gathered through the Government's formal consultation on the planning policy for traveller sites and National Planning Policy Framework

This resulted in production of the following consultation documents:

- Initial consultation on the possible scope of the DPD and what issues it should address;
- A Call for Sites, consultation on the methodology to be applied to site selection and consultation on the scope of the SEA

- 2.4 After each consultation a report was made to the relevant Council Committee. These reports are available to the public in paper form and can be downloaded from the Councils website<sup>2</sup>. They give details of the issues raised and links to the representations in full.
- 2.5 This evidence and consultation has been used to inform the production of the site Design and Layout SPD.

### 3.0 Who have we consulted?

- 3.1 In line with our commitment to early and meaningful community engagement, extensive public consultation has preceded, and informed, each stage of Local Plan production. Since 2006 the Council undertook almost continuous consultation with the communities of East Devon, along with other stakeholders including developers, landowners and infrastructure providers to input into the Local Plan's development. This SPD built on/was informed by this consultation and our approach has been to use the Statement of Community Involvement (SCI) to guide all engagement activity.
- 3.2 We have consulted with everyone on our consultee database who has previously expressed an interest in Gypsies/Travellers/development of land as part of the Local Plan process, by letter and/or e.mail. This includes the specific consultation bodies and general consultation bodies identified in our SCI as well as individual members of the public. We will do this at each stage of consultation.

#### **Specific Consultation Bodies**

Statutory bodies such as or specifically Natural England, Environment Agency and Highways Agency.

Neighbouring Town and Parish Councils and neighbouring County Councils and Local Planning Authorities.

#### **General Consultation Bodies**

Groups representing voluntary, racial/ethnic, religious, disability and business interests.

Specific groups representing certain interests (nationally and/or locally) for example covering environmental, health, education, transport, leisure, economic development and community need issues, equality groups.

Councillors / MP's.

Members of the public including residents of East Devon.

- 3.3 As Gypsies and Travellers are protected by law as an ethnic group with particular characteristics it is important that they are specifically consulted as their views are key to successfully delivering high quality new development which meets their needs.

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<sup>2</sup> The Development Management Committee minutes are available at: <http://eastdevon.gov.uk/council-and-democracy/committees-and-meetings/development-management-committee/>

- 3.4 Recognising that Gypsies and Travellers and their families constitute a significant 'hard to reach' group with poor literacy rates, but who will be directly affected by this SPD we focussed considerable resources on seeking their views and including them in the process from the outset. Initial attempts to engage by inviting representatives of Gypsy and Traveller organisations to comment on proposals generated little response so we contacted all residents of authorised sites in the District directly and asked the Gypsy Liaison Officer to visit residents who required help in understanding the correspondence or producing a response.
- 3.5 We have also directly contacted Offices and some residents in the neighbouring authorities of Teignbridge and South Somerset where the Local Authorities are involved in the delivery and/or running of very successful sites to learn from their examples of best practice.

#### 4.0 How have we consulted ?

##### 4.1 The Gypsy and Traveller Accommodation Assessment

In April 2014, the Devon Partnership local and national park authorities commissioned *RRR Consultancy* to undertake the Devon Partnership Gypsy and Traveller Accommodation Assessment (GTAA). The purpose of the assessment was to quantify the accommodation and housing related support needs of Gypsies and Travellers (including Travelling Showpeople) in terms of residential and transit/emergency sites, and bricks and mortar accommodation for the period 2014/15-2034/35. The results will be used to inform the allocation of resources and as an evidence base for policy development in housing and planning and underpins this SPD.

- 4.4 Data collection and analysis followed practice guidance set out by Communities and Local Government (CLG) in 'Gypsy and Traveller Accommodation Assessments' (October 2007) and 'Local Housing Assessment: A Practice Guide' (March 2005), obliging local authorities to assess the level of need for Gypsy and Traveller sites. To achieve the study aims, the research drew on a number of data sources including:

- Review of secondary information: including a literature review and secondary data analysis
- Consultation with organisations involved with Gypsy and Traveller issues
- Face-to-face surveys of Gypsies and Travellers

##### 4.5 Specific consultation on the Site Design and Layout SPD

The first consultation on the SPD was carried out between 4.10.16-15.11.16.

Emails were sent to everyone on the Local Plan database (including statutory consultees, the public, neighbouring authorities, local Councillors, Parish Councils, interest groups, agents and landowners who have previously expressed an interest in bringing their land forward for development).

We wrote to all of the Gypsies and Travellers whose details we hold

We put the details on our website and produce a press release.

#### 5.0 Duty to co-operate

- 5.1 The Council must engage 'constructively, actively and on an ongoing basis<sup>3</sup>' during the preparation of plans when they relate to 'strategic matters'. Strategic matters are defined as development, including infrastructure, with a significant impact on at least two planning areas. The Council recognises that the travelling lifestyles of Gypsies and Travellers make it impossible to plan for their needs without considering provision in neighbouring authorities.

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<sup>3</sup> Section 110 of the Localism Act 2011

5.2 South Somerset, Taunton Deane and west Dorset Council's have all consulted East Devon on their needs assessments, and so a wider picture of travelling patterns and need is being established. Exeter City, Teignbridge and Mid-Devon Councils were partners in commissioning the Needs Assessment which included East Devon and agreed to adopt its findings. Work is ongoing with them, the other Devon partners, and Devon County Council, to identify suitable transit or stopping places.

## APPENDICES

### **Detailed Summaries of the Consultation that was carried out at each stage and how this has shaped the Gypsy and Traveller Site Design and Layout SPD**

#### Appendix 1- Initial Consultation (4 August –21 September 2015)

The initial consultation (undertaken during August and September 2015) considered the possible scope of a DPD and what issues it should address. Responses to this consultation can be viewed below. Note- At this stage it was anticipated that the document would primarily be concerned with site selection

#### **Summary of representations received relating to initial consultation (4 August- 21 September 2015)**

<b>Representor name or organisation</b>	<b>Brief summary of points raised</b>	<b>Officer Commentary</b>
RSPB	Should include an 'ecological impacts/constraints' topic as significant parts of the District are unsuitable for residential use because of their ecological importance and sensitivity and strong legal protection as Special Protection Area and Special Area of Conservation	This will be incorporated into the draft methodology for site selection, to be consulted on shortly, as a major constraint.
Councillor Moulding	Welcomes intention to establish pitches particularly as this would reduce unauthorised encampments adjacent highways. The study should specifically address 'traveller' needs, not just those of gypsies and showpeople, and sites for these groups should be distinct from each other.	Comments are noted and will be taken into account in preparing the DPD.
Councillor Allen	Proposes that a former campsite on the Eastern edge of Honiton (which already has water and sewage disposal) be considered as a temporary stopping place. It was designated as allotments. It is important that the Turks Head tourism stopping site to the west of the town is not affected.	The site owners, Oaktree Parks, have been approached regarding this suggestion but, in a letter dated 25 <sup>th</sup> September 15, confirmed that the land is not available to be considered for gypsy and traveller pitches.
Cranbrook Town Council	Requires clarification on how the different needs of gypsies, travellers and showpeople will be met through separate sites as recommended by the needs assessment. Need arising from growing families should be addressed in the same way as for the settled community- ie extend or build subject to	Comments are noted and will be taken into account in preparing the DPD.  The inclusion of Gypsy and/or Traveller pitches at Cranbrook was raised at the Local Plan Examination where it was discussed with the Inspector (supported by a written agreement with the East

	<p>planning constraints. Capacity on the showman's site at Clyst St Mary should be explored.</p> <p>Landowners should be asked to put sites forward and these should be consulted on. Suggested that the site at Daisymount (formerly proposed as a service station) on A30 should be considered if EDDC are looking to purchase a site.</p> <p>Travellers are unlikely to want a permanent site so DCC should identify 'negotiated stopping places'.</p> <p>Cranbrook is unsuitable as it is already subject to negotiated residential allocations. Consultation on these proposals should not detract from the popularity/commercial success of Cranbrook as a place to live and work. Villages around Cranbrook are already under pressure and are not suitable for new sites. The Local Plan commentary assumes a new site will be at or around Cranbrook. This is prejudicial to an objective assessment.</p>	<p>Devon New Community Partners) that a site/s for up to 30 pitches should be included within the future expansion of Cranbrook. The provision of pitches as part of strategic allocations is a common approach in Local Plans (eg it is the approach taken in neighbouring authorities of Teignbridge and Mid-Devon).</p> <p>The owners of the Daisymount site have been contacted in writing and a response is awaited.</p>
Chardstock Parish Council	<p>Like any development sites they should be in sustainable locations</p> <p>As some 'travellers' are no longer nomadic, they should have access to everyday facilities.</p> <p>Rural locations are not suitable due to poor infrastructure and lack of services, accessed by narrow lanes.</p> <p>Sites should be close to main roads- A30/A303/M5</p>	<p>Comments are noted and will be taken into account in preparing the DPD.</p>
Whimble Parish Council	<p>Whimble has 3 sites and is providing adequate facilities but Travellers are choosing instead to use roadside verges. No further sites are required and EDDC should encourage use of the designated sites.</p>	<p>Comments are noted and will be taken into account in preparing the DPD.</p>
Honiton Town Council	<p>The Town Council did not consider there to be any suitable sites within the Parish of Honiton.</p>	<p>Comments are noted and will be taken into account in preparing the DPD.</p>
Bishops Clyst	<p>No Traveller sites are needed as Clyst St Mary</p>	<p>Comments are noted and will be taken</p>



Parish Council	already has one	into account in preparing the DPD. The site at Clyst St Mary is specifically for Travelling Showpeople, rather than Gypsies and Travellers though.
Colaton Raleigh Parish Council	<p>Support a policy restricting growth of Gypsy and Traveller sites particularly in AONB's, nature conservation areas and in or close to isolated communities or villages.</p> <p>The Parish has direct, negative, experience of unauthorised development/activity by Gypsies/Travellers, requiring legal action.</p> <p>Encouraging Travellers to the District may be detrimental to local businesses and residents who have previously had to meet clean up costs. The needs assessment should not take priority over the desires of the local community and environment.</p>	<p>Comments are noted and will be taken into account in preparing the DPD.</p> <p>Site selection criteria within the draft methodology do constrain development in particularly sensitive areas.</p>
Lympstone Parish Council	Doesn't usually affect Lympstone. Sites should be located close to the M5/A30 as this area is popular with Gypsies and Travellers. Concern that general housing stock will be used to provide more permanent accommodation, in preference to people already on the waiting list with strong local connections. In all cases, normal selection criteria should be followed.	<p>Comments are noted and will be taken into account in preparing the DPD. The needs of Gypsies and Travellers seeking houses rather than pitches has been taken into account in our housing numbers.</p> <p>Normal selection criteria would apply.</p>
Policy Section, Teignbridge District Council	Information provided referring to Teignbridge producing a guidance note on gypsies and travellers to be included in Affordable Housing SPD. Not a formal response at this stage.	Comments are noted and will be taken into account in preparing the DPD.
Policy Section, South Somerset District Council	Information provided regarding gypsy and traveller need in South Somerset and initiatives such as Council owned and run sites, the G and T forum and work being undertaken to identify transit sites.	Comments are noted and will be taken into account in preparing the DPD.
Planning section, Dorset County Council	There is a need to manage the movement of travellers through the two counties and support allocation of a suitable site as a temporary/emergency stopping place as long as it is well located in terms of services and well screened.	Comments are noted and will be taken into account in preparing the DPD.

	<p>Travellers recently set up an unauthorised camp on the B3165 near the Devon/Dorset boundary. DCC is keen to find a temporary/transit site in west Dorset (around Dorchester/Weymouth) to replace the Piddlehinton temporary site and help meet the need for transit pitches.</p>	
Natural England	<p>There should be no residential development within 400m of the East Devon Pebblebed Heaths SAC and SPA</p>	<p>This will be incorporated into the draft methodology for site selection, to be consulted on shortly, as a major constraint.</p>
Exmouth Civic Society	<p>Pressure on land within Exmouth boundary and neighbouring parishes , and lack of infrastructure, makes new development unsustainable. This area has no spare land for this or any other use. Similarly, no such development should be allowed on the heathland commons of Woodbury or land between it and the Exe or Otter.</p>	<p>This is noted but any sites which are put forward will be considered on their merits in accordance with the draft methodology.</p> <p>This will be incorporated into the draft methodology for site selection, to be consulted on shortly, as a major constraint.</p>
P Smith	<p>Need to recognise that there are 3 distinct groups who constitute gypsies and travellers.</p> <p>A limited expansion of existing gypsy and traveller sites should be considered</p> <p>Could the travelling showman site be expanded?</p> <p>If a site is needed for transient travellers it should be</p> <ul style="list-style-type: none"> <li>• limited to 10-12 pitches (ideally 2 sites of up to 6-7 pitches)</li> <li>• sited where all outside activities are visible to passers-by</li> <li>• managed 24/7 with adequate resources</li> </ul> <p>Serious consideration should be given to the impact on businesses and the community where sites are located.</p> <p>The local authorities should adopt a very strict policy of enforcement and early removal of illegal site users</p>	

Elim Housing	Information regarding sites developed by Elim Housing elsewhere in the country and slides from an HCA event explaining challenges and costs of developing a site. Guidance documents from DCLG also attached for information. Elim are unlikely to be interested in developing in Devon but will share their experience if needed.	
S Beacham	The success of Cranbrook is dependent on a buoyant housing market and sustained demand.  Adverse publicity could jeopardise the prospects of the town. Provision of pitches should be made in a community with the infrastructure to support it. Cranbrook could be considered for long term provision once it is established.	
Aaron	Resident of Cranbrook objecting to traveller site on the basis that it would devalue and prevent house sales. The objector is concerned about antisocial behaviour which they have experienced previously.	
M Amor	Would be less controversial to put site away from established communities. Concern that tax payers money will fund sites that may not be used and costs won't be recouped as site users will refuse to pay. Observations on the requirements for houses for settled gypsies/travellers. Observations on the (in)effectiveness of Government and consultation.	
M Paisley	Objects to site at Cranbrook due to antisocial behaviour which he has experienced previously.	
J Ockleford	Objects to site at Cranbrook on the basis that it would devalue and prevent house sales. The objector feels that a travelling lifestyle should not require a permanent site and it is a waste of money.	
Oil Mill Lane Residents Association	Should be read in conjunction with Local Plan comments of 8 June 2014.  This issue was addressed at the EiP of the Local	

	<p>Plan and by the DMC on 17 June, so this paper (DPD?) is largely irrelevant and out of date. Council should have regard to the redefinition of 'travellers'.</p> <p>Most need is said to come from overcrowding of existing sites but these weren't planned or enforced properly so shouldn't just be expanded or new sites located nearby. They are not sustainably located as required by the NPPF. West of the District shouldn't be the automatic area of search. Over last 10 years there have been lots of complaints relating to unauthorised sites.</p> <p>Speculative purchase of a site by EDDC would create pressure to grant permission on it contrary to the plan led system. Sites should be identified, assess alternatives, assess their sustainability and then allocate in the Local Plan.</p> <p>The simplest and most sustainable approach would be to provide land within larger allocations.</p> <p>Clear policies are also needed re future unauthorised development.</p>	
<p>Knowle Residents Association</p>	<p>As most Gypsies and Travellers will be passing through the District then sites close to the A30 and M5 should be chosen. Sites away from any main urban areas will reduce the chance of residents objections.</p>	
<p>Network Rail</p>	<p>Traveller sites are considered in the same way as other residential sites. Adjacent to operational railways there is an increased risk of trespass due to increased numbers of young people using the railway as a shortcut. If a site next to a railway is selected, at least a 1.8m high trespass proof steel palisade fence must be provided at the developers cost and at least 2m must be left between the fence and any buildings/structures.</p> <p>Suggestion that a new policy should be included in the DPD addressing level crossing safety and the need to contact Network Rail on any</p>	

	applications affecting level crossings.	
David Lock Associates Ltd (representing East Devon New Community Partners)	<p>The need for a gypsy site at Cranbrook should be determined as part of the district wide DPD and not in isolation. Specifically it's scale and nature.</p> <p>Scale of need should be regularly reviewed to avoid over provision.</p> <p>Strategy 12 should be amended to either refer to "a site or sites" or "up to 30 pitches" rather than just "sites" for gypsy provision.</p> <p>There is no basis for gypsy provision being required concurrent and in early years of delivery of "bricks and mortar" housing development which is also inappropriate.</p> <p>No maximum site size should be adopted.</p> <p>Provision should be limited to a site south of the A30 in a location associated with employment provision.</p>	

No specific comments

Dunkeswell Parish Council

South West Water

Budleigh Salterton Town Council

## Appendix 2- Local Plan Consultation (16<sup>th</sup> October – 30 November 2015)

Consultation on the Local Plan was undertaken between 16 October and 30 November 2015. Among the changes which were subject to consultation were:

- An additional criteria to be added to Strategy 12 (between Criterion 1 and Criterion 2):

1b. Gypsy and Traveller Provision - provision will be made for new gypsy and traveller sites to accommodate up to 30 pitches on land allocated for Cranbrook development. Provision will be required concurrently with (though in the early years of) the 'bricks and mortar' housing development of the allocated land.

- An additional paragraph is added to the start of Policy H7 to read:

H7 - Sites for Gypsies and Travellers:

In the period up to 2034, 37 gypsy and traveller pitches and 3 plots for travelling showpeople should be provided. During the first 5 years, from 2014-2019, at least 22 of the gypsy and traveller pitches should be provided and 1 of the travelling showpeople's plots (with this to be accommodated on an existing permitted site with spare capacity at Clyst St Mary).

- Paragraph 16.31 amended to read:

East Devon has relatively few permanent sites for Gypsies and Travellers and unauthorised sites are occasionally reported but this tends to be a short-term seasonal problem. An (Interim Draft) A Devon Partnership Gypsy and Travellers Accommodation Assessment 2014, by RRR Consultancy Ltd, was completed in early 2015. This study has identified a need in East Devon, in the period up to 2034, for a total of 37 gypsy and traveller pitches and 3 plots for travelling showpeople. During the first 5 years, from 2014-2019, at least 22 of the gypsy and traveller pitches should be provided and 1 of the travelling showpeople plots (there is a travelling showperson site at Clyst St Mary that has sufficient capacity to accommodate identified need). The study also identified a need for 4-5 short-term stopping places (each consisting of 4-5 pitches) up to 2019, but did not specify where these should be located. Additional pitches and plots will be provided through appropriate intensification/expansion of existing sites, the provision of a local authority/RSL owned/managed site or sites and through land allocations in a Gypsy and Traveller Development Plan Document, production of which will commence in June 2015 to be submitted for examination by the end of 2016. Until such a time as the Gypsy and Traveller DPD is finalised, decisions on gypsy and traveller sites will be determined in accordance with national policy and with reference to policy H7.

Note- the Local Plan was subsequently adopted and the final text appears at <http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

Appendix 3- Second Consultation (6<sup>th</sup> November 2015 - 4 January 2016)

Summary of representations received relating to second stage of consultation (6 November- 4 January 2016)

Consultation related to-

Call for Sites

Comments on the Draft Methodology

Comments on the Strategic Environment Assessment Scoping Report

Representor name or organisation	Brief summary of points raised	Officer Commentary
National Federation of Gypsy Liaison Groups	<p>The Panel should have more regard for the needs of the travelling community and less dominance in membership from those involved in traditional housebuilding</p> <p>Windfall sites should be considered on their merits, Allocations should meet the needs in full but not be given preference over windfall sites.</p> <p>The yield per site should be adjusted to reflect traveller site characteristics, not follow an approach based on traditional housing schemes.</p>	<p>Comments will be taken into account in preparing the DPD. It should be noted that the Panel who assess sites is intended to be made up of a range of technical experts, those with knowledge of the property market in East Devon and gypsy/traveller representatives.</p>
South Somerset District Council	<p>Information previously provided regarding gypsy and traveller need in South Somerset and initiatives such as Council owned and run sites, the G and T forum and work being undertaken to identify transit sites.</p> <p>Additionally, SSDC have a continuing need for transit provision and there may be opportunities on arterial roads close to the East Devon border.</p>	<p>Comments are noted and will be taken into account in preparing the DPD. The transit site, whilst close to East Devon, is based on South Somerset's need and is unlikely to have capacity to meet East Devon requirements.</p>
West Dorset District Council	<p>Methodology is appropriate and there is unlikely to be any impact on West Dorset.</p>	<p>Comments are noted and will be taken into account in preparing</p>

	<p>The SA-SEA Scoping report should include reference to the West Dorset, Weymouth and Portland Local Plan and associated documents (such as the emerging Dorset-wide Gypsy and Traveller joint SPD) to ensure there is no conflict and avoid cumulative impacts.</p> <p>You may wish to consider adding a further sustainability objective to the SA:</p> <p>Community: support and promote the distinctive character of Gypsy and Traveller communities as well as fostering cohesion with settled communities</p>	<p>the DPD. It is likely that the additional sustainability objective will be incorporated into the SEA/SA</p>
Devon County Council	<p>Site Assessment Methodology- inclusion of 'mineral resources' is welcomed. Waste management infrastructure should also be considered and the extant DCC Waste Consultation Zones and Mineral Consultation Areas should be used in any assessment.</p> <p>SA/SEA scoping report- Jurassic Coast WHS, scheduled ancient monuments and most significant undesignated heritage assets should be referred to. Changes are suggested.</p> <p>DCC will only object on education grounds if it is not possible to accommodate additional children</p>	<p>Comments are noted and will be taken into account in preparing the DPD. It is likely that the additional sustainability objective and other references will be incorporated into the SEA/SA</p>
Dorset County Council	<p>No comments at this stage</p>	
Somerset County Council	<p>SA/SEA- Sensitivity to noise should be given more importance. Stage A should discount potential sites if night-time noise would prevent sleep or occupation of a site would prevent/restrict future growth on allocated land (eg occupation of land adjacent to a quarry would prevent its future excavation)</p>	<p>Comments are noted and will be taken into account in preparing the DPD. The suggestion that noise should be considered at Stage A is likely to be incorporated into the methodology.</p>



Councillor Moulding	Previous comments reiterated. Welcomes intention to establish pitches particularly as this would reduce unauthorised encampments adjacent highways. The study should specifically address 'traveller' needs, not just those of gypsies and showpeople, and sites for these groups should be distinct from each other.	Comments are noted and will be taken into account in preparing the DPD.
Whimble Parish Council	Reiterated previous comments. Whimble has 3 sites and is providing adequate facilities but Travellers are choosing instead to use roadside verges. No further sites are required and EDDC should encourage use of the designated sites.	Comments are noted and will be taken into account in preparing the DPD.
Seaton Town Council	Baseline Information- Paragraph 13  This paragraph should be expanded to include protection of Nature Reserves and the potential impact on the wider natural environment	Comments are noted and will be taken into account in preparing the DPD.
Exmouth Town Council	Suggestion that the Long Range Hotel site near the A30 could be reinstated.	The Long Range Hotel was for sale recently at a cost of £525,000. With grounds of just over 2 acres and planning permission for 12 lodges in the grounds it might have potential, however it is no longer for sale and, even if it were, the cost of purchase and laying out would far exceed the budget agreed by Members.
Talaton Parish Council	The number of sites in small villages like Talaton should be restricted and only allocated in sustainable villages.  Talaton is a very small village which already has 1 permanent site and 1 temporary	Comments are noted and will be taken into account in preparing the DPD.

	site which the PC considers to be enough for a village which is classed as unsustainable.	
Natural England	<p>Methodology- exclusion of sites designated for their biodiversity/geodiversity interests is welcomed but this does not preclude them from indirect adverse impacts.</p> <p>Geodiversity interests should be included alongside biodiversity. Factors which could be affected by development are set out but a criteria for assessing them is needed.</p> <p>SA/SEA Scoping- In drawing on the SA of the EDLP full references should be given and ensure most recent information is used. A stand-alone SA/SEA is needed.</p> <p>HRA- A stand alone HRA is required.</p>	
S Cowlard	Resident of Cranbrook objecting to Traveller site in the area on the basis that it will impact on the reputation and value of the area.	
J and B Berryman	Resident of Cranbrook objecting to Traveller site in the area on the basis that it will impact on the reputation and value of the area.	
South West Water	No comments at this stage	
Network Rail	Main concern is that for safety reasons access to sites should not increase use of any level/pedestrian crossing in the District. Suggestion that a new policy should be included in the DPD addressing level crossing safety and the need to contact Network Rail on any applications affecting level crossings.	Comments are noted and will be taken into account in preparing the DPD.
Bilfinger GVA on behalf of Skypark Development Partnership (St Modwen and DCC as landowner)	<p>Site application- does 'market viability' relate to delivery of a Gypsy/Traveller site or impact on adjacent lad uses?</p> <p>Methodology- Have provided detailed comments on the local plan consultation which</p>	Comments are noted and will be used to inform the DPD. The noise issues are similar to those raised by Somerset County

	<p>should be read in conjunction. Needs clarification to make clear that sites will be assessed in terms of impact on nearby allocations/permissions. A site in close proximity to high quality employment will make it difficult to let and impact commercial demand.</p> <p>The need to protect Gypsy/Travellers amenity could restrict commercial activities (especially at night) and impact upon the future ability of the airport to expand.</p> <p>It is not appropriate for 80% of the District's need to be concentrated in one settlement especially given the proximity of 18 new pitches to be provided in Exeter, sites should be distributed across the District. Evidence suggests Gypsies and Travellers prefer to live rurally, urban sites may not meet their requirements/preferences.</p> <p>Identifying a site at Cranbrook is premature as alternative sites may be available and a methodology may be agreed which renders Cranbrook unsuitable.</p> <p>These comments also apply to the SA/SEA.</p>	Council.
David Lock Associates Ltd (representing East Devon New Community Partners)	<p>The need for a gypsy site at Cranbrook should be determined as part of the district wide DPD and not in isolation</p> <p>Should provision still be required at Cranbrook a single site should be provided, to the south of the former A30 in close proximity to employment provision (south west of Cranbrook). (An indicative location is shown on a map)</p> <p>Methodology- the Panel should include Cranbrook Town Council and EDNCP. The process should also have regard to potential of existing local authority sites and sites put forward for housing in the SHLAA.</p> <p>Reference to 'strategically appropriate locations' should be deleted.</p>	

	<p>Sites should not automatically be directed to Cranbrook, sites elsewhere offering other opportunities eg enhancement, re-use of brownfields, dispersed approach across the District, and the views of existing communities should be considered. Strong opposition from Cranbrook community.</p> <p>Contribution of windfall sites is dismissed in the methodology but could meet needs, especially on existing sites.</p> <p>SA/SEA Scoping report- Negative feedback, and how it will be addressed, regarding Cranbrook sites should be reflected in the SA/SEA process.</p> <p>Reference to sites being 'large scale' and 'up to 15 pitches' should be deleted as there is no one size fits all approach. No maximum size should be adopted or implied.</p> <p>The factors which should be taken into account in the methodology eg Sites should not automatically be directed to Cranbrook, sites elsewhere offering other opportunities eg enhancement, re-use of brownfields, dispersed approach across the District, and the views of existing communities, should equally be considered in the SA/SEA</p>	
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The Planning Inspectorate wrote in response to the consultation, acknowledging the documents as being published for consultation in accordance with Regulation 18 (1) (b) of the 2012 Regulations and requesting that, on publication of the DPD under regulation 19, paper and electronic copies should be sent to the Planning Inspectorate.

At this stage, 2 sites were submitted for consideration by their owners:

**Site 1- 3 Greendale Lane, Clyst St Mary, EX5 1AW.**

Area of approximately 0.6 acres currently occupied by a single Romany Gypsy family, with the remainder being undeveloped greenfield. The site is suggested as being suitable for use by (an unspecified number of) other Gypsies and Travellers. Pre-application enquiries have been made regarding suitability of the site for 4 additional caravans to act as bedrooms for the existing owners teenage children who are currently sharing a caravan with

their parents and contributed to the 'need' for 37 additional pitches across the District.

**Site 2 – Hawkwell Park, Wareham Road, Hawkchurch, EX13 5RX.**

Area of approximately 3 acres, currently with planning permission for 12 permanent and 5 transit pitches. The site is suggested as being suitable for an additional 22 pitches, partly on undeveloped , but hardsurfaced land, and partly on greenfield land, some of which is the sites sewage treatment plant.

Appendix 4- Consultation on the Site Design and Layout Supplementary Planning Document (4<sup>th</sup> October 2016 – 15 November 2016)

**Summary of representations received**

**Consultation related to-**

**Site Design and Layout**

**Comments on the Consultation Statement**

**Comments on the Equalities Impact Assessment**

**Comments on the Strategic Environment Assessment and Habitats Regulations Assessment Scoping Report**

<b>Rep no.</b>	<b>Name</b>	<b>Comment/Summary of comment</b>	<b>Officer Response</b>
<b>224</b>	South West Water	No comment at present	-
<b>232</b>	Aylesbeare Parish Council	<p>Concerned at lack of progress.</p> <p>Parish has experienced permission being granted on appeal due to lack of suitable sites, need a Plan so that this doesn't happen again.</p> <p>Sites should be close to main roads, not in deserted or unspoilt locations.</p>	<p>Site identification work in ongoing in parallel to the SPD, but very few sites are being put forward by landowners.</p> <p>Aylesbeare PC, along with other PC's were invited to suggest suitable sites but haven't done so yet.</p>
<b>1422</b>	R Bloxham	<p>Welcomes guidance which is helpful.</p> <p>Document should differentiate between settled and transitory Gypsies and Travellers. There is a need for at least 4 types of sites:</p> <p>Sites for Gypsy families that are based in East Devon;</p>	<p>The needs assessment didn't differentiate between different types of Gypsy and Traveller. Suggest that a new para 1.12 is added which clarifies the position and recognises that, whilst both groups have the same basic space and amenity requirements, the finish could reflect their cultural preferences.</p>

		<p>Sites for Traveller families that are based in East Devon (which must be separate from the former);</p> <p>At least one site for transitory Gypsy families who wish to stop for a short time in East Devon; and</p> <p>At least one site for transitory Traveller families who wish to stop for a short time in East Devon (which must be separate from the former).</p> <p>States that there is no evidence of seasonal, transitory need- the report is inaccurate.</p> <p>Needs assessment does not break down the requirements for each type of site, sites can't be allocated until this is known.</p> <p>Sites don't need to be in the west of the District unless they are extensions to existing sites, new family sites could be anywhere in East Devon, just as with the settled population.</p> <p>Up to 30 pitches at Cranbrook is an over allocation. This scale is excessive if proper integration is to be possible.</p> <p>Small family sites are preferred by everyone, larger sites are not justified at Cranbrook.</p> <p>References to Cranbrook residents preferences are wrong- they are skewed because they don't reflect most people's view that 30 is too many pitches for the town, the figures should be represented.</p> <p>The comments in the report about pitch size, orientation, layout, amenity buildings, infrastructure, water supply, drainage, sewerage, energy, waste disposal, scrap, storage, postal services, site management, landscaping, the keeping of animals and site boundaries are welcomed.</p>	<p>This is based on the needs assessment which used the data available. There is evidence of a need for transit pitches but this isn't broken down to individual District level. There is limited evidence of unauthorised stops due to the way that data is collected and the DCC policy to tolerate them.</p> <p>Given the recent planning permissions granted, there is now a need for 28 new pitches. If sites elsewhere in the District are approved the number of pitches needed at Cranbrook will reduce further.</p> <p>This paragraph reflected the results of consultation on the Cranbrook Plan. It is agreed that they should be deleted as they do not add significantly to the SPD.</p>
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		<p>Support the principle that everyone is entitled to a peaceful and enjoyable environment and protection of their amenity, so self-employment must respect this.</p> <p>Transit sites are supported but not where they are part of residential sites. They need to be located near main roads so aren't suited to permanent residential use (if they are not visible, they tend not to be used and unauthorised use will continue on more visible sites) and any adjoining residential use tends to expand so that transit pitches are lost and the site ends up larger than anticipated.</p>	<p>It is agreed that transit sites should be located close to main roads to maximise their use and reduce the likelihood of unauthorised stops.</p>
<b>3743</b>	Natural England	<p>Do not wish to comment as the SPD doesn't affect their interests to a significant extent.</p>	-
<b>7207</b>	Cranbrook Town Council	<p>The positive information in the documents will help to provide good accommodation for Gypsies and Travellers and allay some of the concerns of residents.</p> <p>EDDC still do not make any distinction between the needs of different Gypsy and Travellers groups and the fact that they need accommodation separate from each other. It is still not specified how many sites and pitches are required for each, this would help to inform how the sizes and distribution of sites were allocated.</p> <p>Transit sites aren't dealt with properly. A need for transit places near the main routes remains, considering the instances of unlawful occupation every year. If residential sites are to be located in Cranbrook, these should not also be used as transit sites.</p> <p>The need for permanent pitches seems to stem from the needs of existing families who are expanding. Why do these families need to remain in the west of the district? If settled families expand they are expected to be flexible with regard to location and not expect accommodation close to their ancestral roots.</p> <p>The disproportionately high allocation of up to 30 pitches in Cranbrook remains a real</p>	<p>The needs assessment didn't differentiate between different types of Gypsy and Traveller. Suggest that a new para 1.12 is added which clarifies the position and recognises that, whilst both groups have the same basic space and amenity requirements, the finish could reflect their cultural preferences.</p> <p>There is limited evidence of unauthorised stops due to the way that data is collected and the DCC policy to tolerate them. It is agreed that transit sites should be located close to main roads to maximise their use and reduce the likelihood of unauthorised stops.</p> <p>Given the recent planning permissions granted, there is now a need for 28 new pitches. If sites elsewhere in the District are approved the number</p>



		<p>concern – such a large number would lead to poor integration.</p> <p>Provision of small family-size sites is preferred by everyone, why does E D D C propose larger sites? The Town Council is concerned about the figures quoted from the Cranbrook survey about the size of sites. Following previous community engagement the Town Council is of the view that a significant proportion of the local community would have expressed that 30 pitches per site was too many if the question had not been worded in the way it was.</p> <p>Sites being used for some of the “traditional” employments associated with Gypsies and Travellers is a concern due to the impact on neighbours (settled community and other G and T’s).</p> <p>Concerned about the potential contravention of existing established covenants in Cranbrook which stipulate that residents are not permitted to run businesses from their properties or park commercial vehicles in Cranbrook over a weight of 3.5 tonnes. The provision of any workspaces/business spaces on any Gypsy and Traveller plots plus the parking of larger vehicles would contravene the current covenants.</p>	<p>of pitches needed at Cranbrook will reduce further.</p> <p>This paragraph reflected the results of consultation on the Cranbrook Plan. It is agreed that they should be deleted as they do not add significantly to the SPD.</p> <p>The evidence underpinning Government Guidance supports a maximum site size of 15 dwellings as being appropriate. We don’t have evidence to contradict this and require a specific lower threshold, but we do acknowledge that smaller sites will be preferable, particularly in rural areas.</p> <p>These are legal matters and beyond the scope of the SPD.</p>
<p><b>7641</b></p>	<p>Landscape Architect, EDDC</p>	<p>Where referring to being in keeping with the local character reference should be made to EDDC’s and DDC’s Landscape character assessments to ensure the SPD complies with Strategy 46 of EDDC’s local plan.</p> <ul style="list-style-type: none"> <li>- Document should include typical section and key turning circles for vehicles highly likely to use the scheme</li> <li>- Para 2.6 and para. 2.9 conflict as one talks about providing consistency in the treatment of boundaries while the other promotes variation to serve individual needs.</li> <li>- The para. 2.15 examples which are highly likely to be unacceptable to East Devon should not be included in the SPD as they might cause confusion. The final example layout has a very high ratio of hardstanding, why not label the boundary treatment:</li> </ul>	<p>Agree that SPD should be amended to refer to these matters.</p>

		<p>'Boundary treatment to assist integration into wider landscape context'; which would allow for more variation in boundary treatments. None of the sample layouts include space for SuDS, which should be considered under EDDC policy EN22.</p> <p>- Para. 2.16 – the design of Amenity buildings should consider their landscape and visual impacts within the design and site selection process.</p> <p>- Para 3.10 – Reasonable walking distance should be defined more clearly. The layout of the play area should take account of its local and visual context.</p> <p>- Para 3.15-3.17 Landscaping – Should include the following guidance: 'Any landscape design and site layout should take account of the management guidelines set out in the East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment &amp; Management Guidelines 2008 and the Devon County Council Landscape Character Areas Assessment.'</p> <p>- Para. 3.25-3.26 Drainage – reference should be made to DCC's SuDS Manual. Any drainage scheme will have to show how the SuDS Management train has been applied.</p> <p>- Para. 3.31 – The use of lighting should also consider potential biodiversity impacts.</p> <p>- Gypsy and Traveller Supplementary Planning Guidance Policy 1 should take account of the East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment &amp; Management Guidelines 2008 and the Devon County Council Landscape Character Areas Assessment. Currently the policy includes no reference to these landscape evidence bases. The policy needs to be strengthened to include: 'Any drainage scheme will have to show how the SuDS Management train has been applied' to ensure the policy complies with DCC's SuDS Manual and EDDC policy EN22</p>	
<b>7703</b>	RC Jones	In the case of schemes proposed in open countryside, permissions should be granted as exceptions and land should be reinstated if it becomes	Agree that SPD should be amended to refer to these matters.

		disused/abandoned.	
7705	Environmental Health, EDDC	<p>This service has no comments to make regarding the contents of the consultation documents however we do have observations regarding our statutory work and our involvement with the owners and residents of existing gypsy and traveller sites as well as other agencies and neighbours.</p> <p><b>Our observations:</b></p> <ul style="list-style-type: none"> <li>• There have been a number of cases where non-gypsy/travellers have gained residency (become tenants) of caravans on privately owned sites and have then sought to gain social housing.</li> <li>• There have been cases where transit pitches on privately owned sites have become permanent pitches and the occupiers have claimed or are claiming Housing Benefit.</li> <li>• Increasing density on privately owned sites must include full investigations into the adequacy of sewerage provisions to ensure any environmental pollution risks are mitigated.</li> <li>• Use of generators to provide electricity on some rural sites could cause localised land/water course contamination from fuel spills and noise nuisance.</li> <li>• The key to ensuring effective sites is good management.</li> </ul>	Comments noted.
7706	Waddeton Park Ltd	<p>Evidence at the Local Plan Examination clearly stated that 30 pitches are to be provided at Cranbrook (22 by 2019), leaving 7 for the rest of the District. This was agreed by the Cranbrook Consortium of Developers. Para 1.12 should make clear that 30 pitches will be delivered at Cranbrook.</p> <p>The SPD is pointless if the Council doesn't enforce the requirements, doesn't require sufficient information to properly assess applications, doesn't require and apply proper conditions and doesn't enforce.</p>	<p>There is now a need for up to 28 pitches and Policy requires these to be delivered at Cranbrook if suitable sites are not provided elsewhere.</p> <p>Comments noted.</p>
6154	Planning Policy, South Somerset District Council	<p>Consultation Statement – Appendix 3: this should say: <i>Additionally, SSDC have a continuing need for transit provision and there may be opportunities on arterial roads close to the East Devon border.</i></p>	Agree that Consultation Statement should be amended.

<p><b>7458</b></p>	<p>Planning Officer, National Federation of Gypsy Liaison Groups</p>	<p>Guidance is unduly detailed and restrictive. Each site will have different considerations, guidance should be applied with flexibility and this should be specifically acknowledged.</p> <p>The description of what should or should not be provided in an amenity building is unnecessary although we accept that an indicative floor plan is useful.</p> <p>The suggestion that a fire risk assessment should invariably be undertaken is unduly restrictive. The requirement that electrical equipment must be inspected annually by competent and appropriately qualified personnel is wholly unreasonable. This would never be imposed on “bricks and mortar housing” and is thus discriminatory.</p> <p>The guidance fails to recognise that under the revised definition of Gypsies and Travellers as set out in Planning Policy for Traveller Sites, Gypsies must follow a travelling lifestyle. Thus, in the future, most Gypsies will need the means to travel for employment. In our experience this results in the need for sites to accommodate a touring caravan, and possibly a pick-up truck, as well as a living caravan or mobile home. Pitches will thus need to be large enough to accommodate these items but your suggested layouts will not.</p>	<p>Agree that flexibility should be referred to.</p> <p>It is important that a minimum standard for the facilities within an amenity building is established. This is considered to be useful to a site provider.</p> <p>Mobile dwellings are more susceptible to fire risk due to their construction, proximity and cooking/heating methods- access restrictions can make fires harder to deal with too. A risk assessment is considered essential. The requirement for electrical equipment to be tested annually has been amended to ‘should’ rather than ‘must’ .</p> <p>The guidance states “that typical permanent pitches should be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers), drying space for clothes, a lockable shed, parking space for two vehicles and a small garden” which is larger than the representor suggests is required.</p>
	<p>Nick Freer, David Lock Associates on behalf of the East Devon New Community Partners</p>	<p>Comments provided on behalf of Taylor Wimpey UK, Hallam Land Management and Persimmon Homes, collectively (EDNCp).</p> <p>Local Plan states that there are lots of potential options to accommodate need. Policy H7 advocates expansion or intensification of existing sites.</p> <p>The need for sites for gypsy and traveller provision should be revisited in the District, previous assessment is dated 2014, not up to date.</p>	<p>The evidence is less than 2 years old, the resources</p>

	<p>EDDC should demonstrate that it has undertaken full, robust and proactive investigations of the options. SPD should make this context clear and restate the priorities in the Local Plan in terms of seeking to identify options for intensification and expansion of existing sites and through the provision of local authority and RSL owned or managed sites. SPD should emphasise these options, particularly the design opportunities and design principles to be adopted in facilitating expansion and intensification.</p> <p>Proposed design guidance and minimum standards are inflexible and could frustrate delivery and is contrary to the evidence base and Government Policy. NPPF states policies should “<i>optimise the potential of the site to accommodate development</i>” (para 58). The SPD appears to propose a uniformly low density form of layout.</p> <p>Disagree that a minimum of 500 sq metres should be required for all pitches. This is not a national requirement and isn’t evidenced. This takes no account of various other forms of space that are discussed in the SPD so would result in forms of density lower than most of the remainder of the built up areas of East Devon’s towns and conflict with NPPF. Unachievable in the expansion of existing sites and in delivery terms since many sites will be unaffordable.</p> <p>The SPD proposes a one site fits all policy contrary to CLG guidance and needs assessment. Welwyn Hatfield Borough Council sizes are more sensible, “<i>pitches will range in size depending on the size of household...a pitch size of 175sqm may be suitable for a smaller single person household pitch, 325sqm for an average family size pitch and 500sqm for a large family sized pitch.</i>” Smaller pitches are necessary and required.</p> <p>SPD should include a reference to sites and layouts needing to be subject to consultation with the existing settled community and with the gypsy and traveller communities.</p> <p>Little regard has been had to other cost factors - e.g in the promotion of Devon hedgebanks or of renewable energy. Such features are not necessary and cannot be</p>	<p>required for another assessment, and disruption to the Gypsy and Traveller population is not justified.</p> <p>The SPD is intended to apply to new, extended and more intensified layouts.</p> <p>The Needs Assessment recommends a minimum 500 sqm per pitch. This figure is also used in the neighbouring authority of Teignbridge who partnered us in the assessment work, and on Council owned sites in neighbouring South Somerset. The Policy suggests a density of 20 pitches per ha on new sites to accommodate the amenities and parking required by each family, but recognises that, where additional pitches are proposed as an extension to existing family pitches (e.g. to accommodate growing families) and existing facilities are to be shared, space needs will be assessed on an individual basis.</p> <p>Individual or two person families will still require sufficiently large plots to accommodate a living van, parking for work and travelling vehicles, outside space and an amenities block/day room, so the space requirement may not be significantly smaller than a family pitch. The SPD wording at para 2.3 has been amended to add flexibility though.</p> <p>Consultation will take place as part of the planning</p>
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		<p>requirements of a layout or scheme.</p> <p>A robust and proactive assessment would provide a range of opportunities for provision and a range of potential implementation measures to bring such sites forward. As such EDNCp would anticipate that there would be no (or very little) need to make provision at Cranbrook.</p> <p>References to Cranbrook should be amended as further work by the Council will result in far more appropriate locations than Cranbrook for provision especially having regard to the needs of the Gypsy and Traveller communities. Should avoid concentrating all of East Devon’s need at Cranbrook as this does not reflect need and would be unbalanced. Not possible to meet criteria in H7 at Cranbrook</p> <p>The SPD should:</p> <ul style="list-style-type: none"> <li>• spell out the opportunities for intensification and expansion and provided design guidance relating thereto;</li> <li>• avoid minimum and intransigent standards that will serve to frustrate the delivery of various types of provision;</li> <li>• delete all reference to minimum standards of space - and recognise the need for a range in the types of provision;</li> <li>• delete all reference in particular to a minimum pitch size of 500 sq metres (especially in the new policy and in para 2.3)</li> <li>• set out the obligation to optimise the potential of sites;</li> <li>• avoid absolute standards to be adopted in all circumstances - it is not necessary either to plan for a minimum 15 metre trailer (2.7), to set out detailed standards for amenity buildings (page 18);</li> <li>• carefully avoid prescription in relation to the need for or elements of specific features. There is not a one fits all design solution</li> <li>• the last but three para of the policy on page 28 - “Each pitch...” should be deleted.</li> <li>• refer to the importance of consulting existing and new communities on the form and specifics of provision; and</li> <li>• recognise the need to deal with each case on its merits with design depending not on standards and prescription but site characteristics and the needs of the existing and future residents</li> </ul>	<p>application process.</p> <p>Cost factors have been taken into account and, where these features are not essential (renewable energy) the text states that they will be ‘encouraged’ rather than required.</p> <p>The Local Plan Inspector agreed that Cranbrook should accommodate up to 30 pitches. The SPD adds detail to the Local Plan, it is not an opportunity to change Local Plan Policy.</p>
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