Examination Consultation
Provision for Gypsies and Travellers
January/February 2019

Statement of Consultation
1. **Introduction**

1.1 The North East Derbyshire Local Plan was submitted for Examination on 24 May 2018. Hearing sessions on several main matters were held in November and December 2018 pending the completion of further work by the Council on site provision for gypsies and travellers. That work was subject to public consultation between 4th January 2019 and 15th February 2019.

1.2 This consultation differed from previous Local Plan consultations, in that it formed part of the examination process and was run under the direction of the Inspector appointed to examine the Plan.

1.3 In cooperation with the Programme Officer, the Council assisted the Inspector in inviting comments and in collating responses. This Statement of Consultation explains who was consulted, when and how. Furthermore it summarises the main issues raised and provides a Council response.

1.4 The examination consultation was widely publicised, using a number of different methods, in line with the Council’s Statement of Community Involvement. These are set out below.

2. **Availability of information**

2.1 Comments were invited on the following Gypsy and Traveller documents and proposed allocations for gypsy and traveller sites.

- Gypsy and Traveller Accommodation Assessment (GTAA) Position Statement (EB-G&T1a)
- Gypsy and Traveller Accommodation Assessment (GTAA) Final Report (EB-G&T1b)
- Gypsy and Traveller Topic Paper (EB-G&T2)
- Updated Addendum to the Gypsy and Traveller Topic Paper (December 2018) (ED44d) – which includes the four proposed sites
- Sustainability Assessment of the Gypsy & Traveller Sites Assessments (ED44b)
- Landscape Appraisal Technical Note (ED44c) for Site GT/09 Temperance Hill, Woolley Moor

2.2 Paper copies of the above documents were available at all public libraries in the District and at the Council Offices, from the start of the Consultation Period. A new document (ED44e) was added to the consultation material on 14 January 2019. This is a replacement of Appendix 4 to address formatting errors in the Updated Addendum to the Gypsy & Traveller Topic Paper.

2.3 The Inspector asked for comments on the documents and proposed sites to be made by responding to the Inspector’s Matters, Issues and Questions (MIQs) that are listed in the MIQs document. The Inspector has also provided a Briefing Note which provides guidance on the procedural and administrative arrangements for the examination of the North East Derbyshire Local Plan in relation to the provision for gypsies and travellers. Several paper copies of the MIQs and Inspector’s Briefing
Note were also made available at all public libraries in the District and at the Council Offices.

2.4 All above documents were also available in pdf format on the Council’s website, as well as on the online Consultation Portal.

3. **How people were invited to make comments**

3.1 All contacts on the consultation database (including those who had previously responded to local plan consultations) were contacted via letter or email informing them of the consultation and how they can view the documents and respond to the consultation. This also included all Statutory Consultees.

3.2 A list of all consultees who were directly invited to comment and the publication materials to advertise the consultation, are included in the Appendix to this statement.

3.3 In addition, 25 letters were sent to the occupiers of neighbouring properties informing them of the consultation. The four Parish Councils within whose area the proposed sites are located were also sent the Inspector's MIQ and Briefing Note.

3.4 Information on the Examination Consultation was advertised on the council’s website, as well as on social media. Over the course of the consultation 11,233 people were reached on the eight posts the Council made about the consultation on Facebook. Furthermore, 7,611 people were reached via the eight Twitter posts the Council published. Overall, almost 19,000 people were reached through social media, which is similar to the Consultation on the Publication Draft Plan in 2018 (20,000 people reached).

4. **How people could make comments**

4.1 An online consultation portal has been available to consultees to view the consultation documents and to make and manage comments online. This system was signposted and accessible from the Council’s Local Plan Examination website page, as well as within the letters and emails which were sent directly (see section 3 above).

4.2 Those preferring to submit their comments by email or wishing to discuss consultation arrangements could email the Programme Officer. Those wishing to ask questions regarding the content of the planning documents were advised to contact the planning policy team.

4.3 Comments could be posted to the Programme Officer. Any that were submitted in error to the Council were forwarded on to the Programme Officer.
5. How the comments were dealt with

5.1 Due to the consultation being part of the Examination, it was run under the direction of the Inspector appointed to examine the Plan. The Inspector will look at all responses\(^1\) received and will hold Hearing Sessions on 13\(^{th}\) and 14\(^{th}\) March 2019.

5.2 The Council has summarised each comment received, to provide an overview, both in question order (ED69) and respondent order (ED70). Wherever possible the summaries include the exact text from the comments. The Council has not amended any factually incorrect information or incorrect identification of Inspector’s Questions in the summaries. Where comments did not identify a question, officers have identified the most appropriate question. Where more than one question was referenced in a response, but no specific indication which comment referred to which question, officers have identified the most appropriate comments to the question.

5.3 A summary of a respondent’s comments, their categorisation (support/object) and the question to which the comment has been assigned was emailed to each person submitting comments.

5.4 Those comments which contained discriminatory, offensive or defamatory language were sent back to the respondent to rephrase. If no rephrasing was received, the text was redacted\(^2\). The Inspector will only see the rephrased or redacted text. Personal data was removed in line with the Data Protection Act 2018.

6. Main issues raised

6.1 Overall, 314 individuals and organisations made 534 comments (i.e. answered 534 Inspector’s questions). Examination Documents ED69 and ED70 includes all people and organisations who responded to this consultation.

6.2 Of the 534 comments, 25 (5\%) were in support of the consultation documents and sites and 505 (95\%) raised objections. A few stakeholders either commented on the consultation documents or suggested minor changes. These have been listed as objections.

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1 Responses without either a name or contact details are not duly made and will not be seen by the Inspector. Five responses were received without a name or contact details.

2 Please note that due to time constraints in relation to the timing of the Hearing Sessions, two comments were redacted without being able to wait for rephrasing.
6.3 Summaries of each comment are included in the schedules of representations (ED69 and ED70). The full responses and attachments are available online https://bolsover.jdi-consult.net/localplan/readdoc.php?docid=13, by clicking the magnifying glass of the relevant policy or supporting text.

6.4 The main issues that were raised during the consultation are included at table 1 below, ordered by Inspector’s question. The Council’s response to these main issues is also provided.
### Table 1: Summary of Main Issues Raised – Provision for Gypsies and Travellers

Notes for Table:
- i) Where the subject matter aligns issues have been grouped where possible.
- ii) Where similar issues have been raised in different questions, the Council has given one response in the most appropriate location.

<table>
<thead>
<tr>
<th>Issue – Whether the plan is based on a robust assessment of need for gypsies and travellers</th>
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<tbody>
<tr>
<td><strong>Question 1.</strong> Has the Council complied with the duty to co-operate in respect of the assessment of need and provision of sites for gypsies and travellers? How has that co-operation been undertaken and what outcomes have resulted from that process?</td>
</tr>
<tr>
<td>5 comments received – 2 support – 3 object</td>
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#### Issue: Duty to Cooperate - support

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<tr>
<th>Summary of Issues Raised</th>
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<tbody>
<tr>
<td>Derbyshire County Council has engaged with NEDDC and other partners including the Derbyshire Gypsy Liaison Group to prepare the Gypsy and Traveller Accommodation Assessment (GTAA). Derbyshire County Council's officers have engaged in seeking to identify land in the County Council's ownership that might be suitable for use as Gypsy and Traveller sites. No potential sites were assessed by the County Council as suitable for release for Gypsy and Traveller accommodation.</td>
</tr>
<tr>
<td>We can confirm that North East Derbyshire Council approached Sheffield in early 2018 under the duty to cooperate. SCC remains unable to accommodate extra need from North East Derbyshire.</td>
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#### Council's Response

Comments noted

#### Issue: Duty to Cooperate - Object

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<tr>
<th>Summary of Issues Raised</th>
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<tr>
<td>NEDDC have not consulted with the local community.</td>
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<tr>
<td>No. Many residents are not aware of any proposals.</td>
</tr>
<tr>
<td>NEEDC are running out of time and have taken the decision to extend existing sites rather than find new sites.</td>
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</table>

#### Council's Response

The Council considers that it has fulfilled all the requirements of proper consultation and has prepared a consultation statement to set out the steps it has taken. It appreciates the support for this.

The timescale has not affected the selection of sites, only two of which are adjacent to existing traveller sites.
**Issue – Whether the plan is based on a robust assessment of need for gypsies and travellers**

**Question 2.**

Is the assessment methodology in the GTAA robustly based and in line with national policy as set out in the Planning Policy for Traveller Sites (2015) (PPTS)? Does the PPTS have any implications for the assessment and would the definition of gypsies, travellers and travelling showpeople in the PPTS1 have any implications for the level of need identified?

4 comments received – 1 support – 3 object

<table>
<thead>
<tr>
<th>Issue: Financing traveller sites</th>
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<tr>
<td><strong>Summary of Issues Raised</strong></td>
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<tr>
<td>• Tax payers don't want to pay for the site(s)</td>
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<tr>
<th>Council’s Response</th>
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<tr>
<td>The matter of how funding of sites is delivered is not relevant to a local plan.</td>
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<tr>
<th>Issue: GTAA is out of date - support</th>
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<tbody>
<tr>
<td><strong>Summary of Issues Raised</strong></td>
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<tr>
<td>• Despite revisions to guidance the GTAA is still considered to be compliant with requirements for accommodation assessments in the revised Policy document.</td>
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<tr>
<th>Council’s Response</th>
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<tr>
<td>Comments noted</td>
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<tbody>
<tr>
<td><strong>Summary of Issues Raised</strong></td>
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<tr>
<td>• The GTAA uses an outdated definition of traveller which includes those who have 'permanently ceased' to travel. The GTAA is therefore out of date and we believe it no longer represents a relevant needs assessment.</td>
</tr>
<tr>
<td>• GTAA relies on data from surveys conducted in 2014, which are out of date and contrary to NPPF para 31.</td>
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<tr>
<td>• The results of the assessment does not provide an indication of current need.</td>
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<tr>
<td>• The Council should have undertaken a new needs assessment which in our view would have resulted in lower level of need.</td>
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<th>Council’s Response</th>
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<tr>
<td>As stated also by Derbyshire CC in its response, The GTAA has been tested at a number of Local Plan Examinations in Public (EIPs) since it was published and has been deemed by respective Inspectors to provide a sound and robust basis for the assessment of Gypsy and Traveller pitch and Travelling Showpeople’s plot provision in emerging Local Plans. Although Planning Policy for Traveller Sites has been revised by Government (August 2015) since the GTAA was published, primarily relating to Green Belt matters and an</td>
</tr>
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</table>
### Issue – Whether the plan is based on a robust assessment of need for Gypsies and travellers

amended definition of Gypsies and Travellers, the GTAA is still considered to be compliant with requirements for accommodation assessments in the revised Policy document.

### Issue: The revised MHCLG definition has reduced the requirement

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<tr>
<td><strong>Issue:</strong> Two thirds of the respondents to the GTA survey stated that they did not intend to move in the future, suggesting that the people surveyed to identify the need for 15 sites did not themselves fall within the current definition of &quot;traveller&quot;. (EB G&amp;T2)</td>
</tr>
<tr>
<td><strong>Issue:</strong> Given the proportion of respondents who would be excluded from the revised definition, the reduction in requirement will be more than slight.</td>
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<tr>
<td><strong>Issue:</strong> Since the rules changed in 2015, many councils have identified the need for fewer pitches. Of the 27 authorities with comparable data, 21 plan to provide less space than before (source: ‘Friends, Families and Travellers’).</td>
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#### Council’s Response

The stated response to the survey is not an indication that those travellers fall out of the revised definition, as they have not indicated they have ceased to travel, but do not intend to move from their current location, or base for travelling.

While an assessment was made in the GTAA of those intending to move from ‘bricks and Mortar’ housing onto a pitch, (1.9 pitches for NEDDC) the reason for this was assumed to accord with the then definition. However it was acknowledged in the GTAA (7.1-3 & 7.22) that this may under-estimate the requirement as it was based on a small partial survey of a potentially much larger group.

While other authorities may have reduced their requirement, it is not made clear in representations whether this has been supported through the Local Plan Examination process.

The evidence from the Council’s GTAA could indicate a minimal reduction in requirement. The appropriate response to the change in definition is to commission a GTAA update in 2019 as raised to be considered by Derbyshire Planning Officers Group at its next meeting (7 March 2019). The latest position will be confirmed at the hearing.

Bearing the previous point in mind, there is an immediate requirement for 6 Traveller pitches to 2019, based on the requirement backlog from 2014, plus a five-year supply would indicate 3 further pitches.

### Issue: - GTAA methodology is flawed

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<tr>
<td><strong>Issue:</strong> The methodology relies on inadequate assumptions, for example that the inflow and outflow of Gypsies and Travellers would be equal, when there is no evidence provided to support this. The assessment does not accurately take account of those who do not wish to stay.</td>
</tr>
<tr>
<td><strong>Issue:</strong> As unauthorised encampments in North East Derbyshire are few, it could be concluded that the requirement for pitches is limited.</td>
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</tbody>
</table>
**Issue – Whether the plan is based on a robust assessment of need for gypsies and travellers**

**Council’s Response**

While the assumptions in the GTAA may be challenged, they are demonstrated to be the most reasonable ones, and evidence to the contrary is absent.

See also response to Q.2, 1st Issue

**Question 3.**

*Does the GTAA appropriately identify the level of need for different types of accommodation in the plan area including permanent residential sites, transit sites and emergency stop over sites and for different types of tenure on residential sites?*

3 comments received – 1 support – 2 object

**Issue: - Assessing appropriate need.**

**Summary of Issues Raised**

- It would be better to make sites available for use when needed. There are plenty of plots available for occupation.
- "New Age Travellers" travelling seems to have declined.
- It is impossible to prove need; the need is 'very small'.
- Thus there could be some 'suppressed demand' for traveller sites.
- No-one will ever know what the five year demand is so that a five year supply cannot be calculated. Statistically, the numbers are too small.
- No transit sites or emergency stop over sites have been identified for the next 5 years.
- Chesterfield Borough Council have a transit site adjoining an established site, which is always full. (unverified) (Comment only)

**Council’s Response**

The Local Plan is required to make specific provision, but a criteria-based policy also provides for ad-hoc needs arising.

See also response to Q.2, 1st Issue

**Question 4.**

*Does the GTAA identify any need for travelling showpeople’s accommodation within the District?*

2 comments received – 2 support – 0 object

**Issue: - The need for a travelling showpeople's site**

**Summary of Issues Raised**

- The Assessment does not identify the need for any additional Travelling Showpeople's plots in North East Derbyshire District.

**Council’s Response**

Comments noted
### Issue – Whether the plan is based on a robust assessment of need for gypsies and travellers

#### Summary of Issues Raised
- Support for a site for Travelling Showpeople in a more rural area, on the outskirts of a town, run by the local authority.

#### Council’s Response
The GTAA has made an assessment of Travelling Showpeoples’ needs. A criteria-based policy is intended to accommodate any proposal for such a site.

#### Question 5.
*Is any further joint assessment of the need for gypsy, traveller and travelling showpeople’s accommodation with other adjoining local planning authorities necessary and are there any firm proposals to undertake this work?*

1 comment received – 1 support – 0 object

### Issue: - Need and proposals for a future assessment.

#### Summary of Issues Raised
- There may be a need to commission an update in 2019, the issue of the need to update the GTAA has been the subject of discussion by the Traveller Issues Working Group (TIWG).

#### Council’s Response
There are proposals at the current time by the Derbyshire Traveller Issues Working Group (TIWG) to commission a refresh or update of the GTAA in 2019. This commissioning will be considered by Derbyshire Planning Officers Group on March 7th 2019, as raised by the TIWG on 5th February 2019.

#### Question 6.
*How would the needs of the wider community who reside in caravans or houseboats including people who are no longer classified as gypsies, travellers and travelling showpeople be identified and addressed?*

0 comment received

#### Question 7.
*In assessing the level of need, has appropriate account been taken of:*
- Overcrowding on existing sites;
- Newly forming households;
- Future household formation from families moving out of bricks and mortar accommodation.

7 comments received – 1 support – 6 object
### Summary of Issues Raised

- I believe the local plan identifies the need to only increase the number of pitches within the existing areas that have sites currently. For example High Peak have no pitches currently so do not need to provide any in the future. The methodology behind this is flawed in its self, no consideration would appear to have been given to the cumulative effects of increased numbers of travellers within existing areas or to the need for equal distribution of sites through the entire locality. The Areas that already have established sites have surely met their obligations already and should not be put under undue pressure.
- Has the option to re-establish the Shirebrook Gypsy Site been considered?
- Does not the removal of the Wingerworth proposed site invalidate the whole consultation process?

### Council’s Response

The GTAA methodology, although it has been challenged, remains robust, and independently tested, see response to Q.2, 1st Issue.

Should the Shirebrook Gypsy site change its status, or any provision be made in adjoining districts, in particular Chesterfield or Bolsover, then this would be taken into account, under the duty to cooperate, at a Plan review. However, at this time no sites have come forward. This is under constant review and monitoring.

The withdrawal of the site at Wingerworth was a matter for the District Council, based on the evidence presented. It was consulted on in good faith on the evidence at the time. There is no implication for the consultation process.

Comments on individual sites are addressed under those sites except where they make more general points.

### Question 8.

*Have the affordable housing needs of gypsies and travellers been assessed as part of the mix of affordable housing provision? How would this need be identified and addressed?*

0 comment received

### Question 9.

*Does the GTAA address the qualitative as well as quantitative need for additional pitches including in terms of site location, site size, access to services and facilities and site facilities?*

3 comments received – 1 support – 2 object

### Issue: Quality of provision and facilities on sites - support

- The GTAA clearly sets out recommendations for size of new pitches, accommodating necessary facilities.

### Council’s Response

Comment noted
**Issue: Quality of provision and facilities on sites - object**

**Summary of Issues Raised**

- Generally traveller sites are not just residential. Often there is some sort of trading or manufacturing goes on as well.
- One site specific comment addressed under the relevant issue.

**Council’s Response**

The site size recommendations in the GTAA account for the activities likely to take place on a site.

**Question 10.**

*Do the 5 authorised sites in the District referred to in the Gypsy and Traveller Topic Paper (EB – G&T2) (paragraph 3.13) have a permanent planning permission? In addition, are any of the permissions personal to the occupants and if so, can the Council please provided the necessary details?*

1 comment received – 0 support – 1 object

**Issue: Planning permissions on sites**

**Summary of Issues Raised**

- There no permanent planning permissions on the proposed site (2 pitches) at Dark Lane, Calow for any further development.
- The existing site at Calow has been fully developed.
- Insufficient consideration has been given regarding access, services and facilities at the Calow site.
- This was the easy, ‘tick box’ option for NEDDC to just add two extra pitches on an existing site without due care and attention.

**Council’s Response**

The permissions applicable to each site are set out in the Council’s response to this question. The remaining comments have been addressed under the site-specific questions (14-18)

**Question 11.**

*Are any improvements to facilities and services on any of the existing authorised sites necessary and which policies in the plan would be used to assess such proposals?*

1 comment received – 1 support – 0 object

**Issue: Provision of sufficient housing of different types of resident**

**Summary of Issues Raised**

- The Council should do more to provide new style homes for homeless people, e.g. such as mobile homes, converted structures and small living homes on brownfield land
Council’s Response

Provision is made in the Plan for all these potential means of delivering housing. However, the funding for such housing is not a matter for the Local Plan, unless specifically identified through affordable housing needs.

**Question 12.**

*Is the site selection process soundly based and has it been informed by the consideration of relevant factors including site location, access to services and facilities, site size and other relevant constraints? How were the assessment criteria modified compared with those used in the assessment of general housing sites and is the approach justified?*

12 comments received – 5 support – 7 object

**Issue: Factors informing the Site Assessment and application of criteria for site selection – support / comment**

**Summary of Issues Raised**

- Site foul drainage will need to connect to a main sewer where possible. Otherwise foul drainage will need to be connected to a Package Treatment Plant (PTP)
- HS2 Ltd raise no objection to the proposals. Coal Authority have no comments. Historic England has no concerns to raise in relation to its remit for the historic environment and the four sites set out in the consultation document.
- NFGLG generally supports the approach taken to meeting the needs of Travellers. However:
  - The sites proposed at Wingerworth and Wooley Moor will result in strong local opposition and may be difficult to deliver. Even if these sites can be delivered, there will remain a shortfall.
  - Accordingly, the criteria based policy to deal with sites which come forward for approval should be as flexible as possible.
  - Support for the other two sites put forward for allocation, at Calow and North Wingfield, although we believe that the site at North Wingfield is likely to provide only two pitches.
  - The site at Calow could be extended to the south to create a site for three pitches in total. There is a willing owner. We dispute the doubts raised about the adequacy of the access.

**Council’s Response**

The Council notes these comments.

The criteria-based policy is intended to be more flexible towards Traveller sites, specifically accommodating the requirements of such sites.

An extension of the site at Dark Lane, Calow would go some way to meet the identified need for pitch provision. However, further clarification with the landowner regarding site boundaries and pitch requirements is needed. The suitability of the site also requires further investigations including liaison with Derbyshire County Council regarding access.
Issue: Factors informing the Site Assessment and application of criteria for site selection - object

<table>
<thead>
<tr>
<th>Summary of Issues Raised</th>
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<tbody>
<tr>
<td>• The site selection process is not soundly based. There was no consultation with residents prior to January 2019 and consultation included only people on the Local Plan database. There was no specific correspondence with immediate neighbours to the sites. The consultation was poorly advertised.</td>
</tr>
<tr>
<td>• The Council has not provided adequate information over the site selection process (understood to be the Gypsy &amp; Traveller Topic Paper (EBG&amp;T2)). This information should be available for local residents to assess whether reasonable alternatives have been given proper consideration.</td>
</tr>
<tr>
<td>• There is no evidence that the location of the proposed allocations was directed by, or is supported by the Gypsy and Traveller community.</td>
</tr>
<tr>
<td>• Landscape Impact did not feature in the Step 2 Site Screening (understood to be in the Gypsy &amp; Traveller Topic Paper (EBG&amp;T2))</td>
</tr>
<tr>
<td>• Site(s) associated with level 4 settlements should have been discounted for detailed site assessment. The rationale over not considering new housing in the area while allowing for traveller sites is questioned.</td>
</tr>
<tr>
<td>• Local Plan policies should have been applied consistently to the selection of Gypsy &amp; Traveller sites, in particular SS1.</td>
</tr>
<tr>
<td>• Potentially suitable NEDDC/ DCC owned land may have been excluded for unsound reasons. The conclusions do not accord with conclusions reached in the Council's evidence.</td>
</tr>
<tr>
<td>• The Site Selection methodology has not been consistently applied to all the sites considered over the years.</td>
</tr>
<tr>
<td>• Site GT/09 should have been discounted at step one. The site selection process is not robust as the Council has failed to consider key evidence.</td>
</tr>
<tr>
<td>• How many caravans and how many vehicles can constitute a single pitch?</td>
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Council’s Response

While the advice in the GTAA regarding early engagement is acknowledged, residents were informed as soon as realistic potential sites could be identified and made public. The Council has, from the time of submission of the Local Plan, made clear its ongoing work to identify Gypsy & Traveller sites.

The Council has consistently engaged with the Derbyshire Gypsy Liaison Group over the search for, and selection of sites.

The Council has had regard to the Government’s Planning Policy for Traveller Sites, in particular paragraphs 3 & 4, and its policies A-F. This has guided its approach to site selection and the context presented by Local Plan policies.

Gypsy and Traveller provision is considered appropriate for a countryside location, as made clear in PPTS and Policy SS9 (as modified), thus allowing for small-scale development in association with level 4 settlements.

The examples given for exclusion of NEDDC/ DCC owned sites were those presented by the landowners. Without a willing landowner a site cannot be considered available.
Despite the site selection having been done in two stages the Council undertook to ensure that sites were included for later appraisal, rather than excluded. Therefore all sites referred to in the Updated Addendum to the Gypsy & Traveller Topic Paper (ED44D) were considered on a consistent basis. For the same reason landscape assessment has been undertaken consistently across a wider range of sites.

Pitch size and facilities are set out in the GTAA and adopted by the Local Plan.

Comments on individual sites are addressed under those sites except where they make more general points.

Comments in relation to consultation methods is dealt with at Q28/ Location & general issues.

### Question 13.

**Has the site selection process been informed by Sustainability Appraisal and is it clear how this has informed the identification of the sites proposed for gypsy and traveller accommodation?**

<table>
<thead>
<tr>
<th>3 comments received – 0 support – 3 object</th>
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<tr>
<td>● Site selection cannot have been informed by the Sustainability Appraisal</td>
</tr>
<tr>
<td>● NEDDC should have contacted nearby residents with their proposal to identify the site(s). Correspondence from the NEDDC has been vague and underhand.</td>
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### Council’s Response

The Updated Addendum to the Gypsy & Traveller Topic Paper sets out how the Sustainability Appraisal has informed the selection of sites at both stages (February and November 2018).

The Council undertook consultation in accordance with its Consultation Statement and further detail is set out at Q28/ Location & general issues.

Comments on individual sites are addressed under those sites except where they make more general points.
### Question 14.
*Would the proposed allocation be justified and appropriate in terms of its location including access to services and facilities and the site size?*

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<th>3 comments received – 1 support – 2 object</th>
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**Issue: Location, access to facilities and site size**

**Summary of Issues Raised**

- The proposed site cannot be considered to be a ‘small family gypsy site’.
- To increase the site by two pitches would double the size of the site and would clearly dominate the adjacent 6 cottages and neighbouring properties and infringe on their quality of life and daily activities. It would also detract from the rural character and appearance of the location, urbanising the area even further than it is at present with the existing site.

**Council’s Response**

Response to the above issues is covered in the Council’s Main Matter 15 response statement – see Q14.

In summary, the council considers the proposed use of the site is fully justified and appropriate in terms of its location and the size of the site.

### Question 15.
*Can a satisfactory form of development be achieved having regard to the local environment; connections to utility services; access onto local highway network; adjoining uses; air and water quality, noise pollution, land stability and flood risk.*

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<tr>
<th>7 comments received – 2 support – 5 object</th>
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**Issue: Location in relation to adjoining uses**

**Summary of Issues Raised**

- The site is relatively small and unlikely to have any significant landscape or visual effects.
- Impact on local environment and residents living nearby
- Would impinge on natural beauty of the area
- Effect on wildlife and local area
- Council need to build mini small homes for visitors travellers

**Council’s Response**

Response to the above issues is covered in the Council’s Main Matter 15 response statement – see Q15: the local environment.

The impact of the proposed use of the site on the landscape and biodiversity have been fully considered through the sustainability appraisal process.
Site CAL/2301T - The Old Potato Store, Dark Lane, Calow

The Sustainability Appraisal Regulation 19 Report (SubD3a) at paragraph 2.28.3 found the proposed use of the site would be largely in keeping with the existing setting, and would be unlikely to impact upon biodiversity assets.

Through the consultation it should be noted that Derbyshire County Council’s Landscape Team has commented that the site is relatively small and unlikely to have any significant landscape or visual effects.

Issue: Access

Summary of Issues Raised

- Access to the proposed site is through a privately owned site, there is no other access.
- The uncertainty as to whether suitable access can be made to the site seems highly problematic - the fact that Dark Lane is of a 'narrow and tortuous alignment' and so may impact upon the safety of other highway users is alarming. This would cause concern for current residents in the surrounding area.
- The fact that access could impact on hedgerows indicates that there are environmental concerns; in an area where there seems to be increasing private housing development I feel we must protect the vacant land from any further urban sprawl and maintain areas, where possible, for forestry, agriculture as well as areas to provide habitat to wildlife.
- The access to the proposed site would have to utilise the existing access from Dark Lane and route through the existing pitches to the north-west. The existing access is set back from the highway and a satisfactory level of visibility is not achievable as the land required is outside the control of the site owners. The proposed development would result in the intensification of the existing access and be detrimental to highway safety.
- The impact of increased traffic on the rural lanes in the vicinity of the site would be detrimental to the character and appearance of this area of the countryside.

Council’s Response

Response to the above issues is covered in the Council’s Main Matter 15 response statement – see Q15: access to the local highway network.

It should be noted that Derbyshire County Council as the local highway authority has raised no objection to the proposed use of the site.

Issue: Connections to utility services including water, electricity, gas and drainage and position of high voltage electricity line.
Site CAL/2301T - The Old Potato Store, Dark Lane, Calow

Summary of Issues Raised

- The proposed site is laid to grass therefore no services are directly available other than major disruption for installation through the existing site.
- Effect on services and local facilities
- There are capacity issues with the existing foul drainage system to cope with further development in this location.
- Please see enclosed plan referenced ET307 at Appendix 1. The proposed Gypsy and Traveller site (CAL/2301T) is crossed or in close proximity to a National Grid high voltage electricity transmission overhead line.
- The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid’s overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

Council’s Response

Response to the above issues are covered in the Council’s Main Matter 15 response statement – see Q15: connections to utility services including water, electricity, gas and drainage.

The issue of the proximity of the high voltage overhead line is considered to be a matter which could be satisfactorily addressed at the planning application stage through the careful design and layout of the development and its relationship to the electricity equipment.

In this regard, the council will have regard to National Grid’s “Creating a Sense of Place: Design Guidelines”, and any subsequent advice to ensure safety clearances are maintained between conductors and the ground, trees, buildings and any other structure proposed on the site.

Issue: Air and water quality, noise pollution, land stability and flood risk

Summary of Issues Raised

- There are no flood risk issues associated with the proposed use of the site.
- Impact on air quality
- Would cause noise pollution
- Surface water flooding is a problem that occurs on Dark Lane and adjacent grazing land which would be further compounded by the proposed development.

Council’s Response

Response to the above issues are covered in the Council’s Main Matter 15 response statement – see Q15: air and water quality, noise pollution, land stability and flood risk.

It should be noted that the Environment Agency, and Derbyshire County Council as the Lead Local Flood authority, have raised no particular flood risk issues with the proposed use of the site.
Site CAL/2301T - The Old Potato Store, Dark Lane, Calow

**Question 16.**
**Is the proposed allocation deliverable within the plan period and has it been confirmed by the landowner as being available for the use proposed?**

1 comment received – 0 support – 1 object

**Issue: Deliverability**

**Summary of Issues Raised**

- It is understood that the landowner of the proposed site is an occupant of the existing site.
- Some excavation work to level the land has been carried out and this is unacceptable as no decision has been made.

**Council’s Response**

Response to the above issues are covered in the Council’s Main Matter 15 response statement – see Q16: deliverability.

The issue of excavation work on the site is beyond the remit of the local plan. However, planning and enforcement officers have recently visited this site and found no evidence of any excavation works having taken place.

**Question 17.**
**Are any additional measures or safeguards necessary to achieve an acceptable form of development?**

3 comments received – 1 support – 2 object

**Issue: Mitigation measures**

**Summary of Issues Raised**

- The site has been the subject of many issues in the past few years which have been mainly down to the lack of planning enforcement by the Council.
- The Parish Council has serious concerns that future development would be allowed to be carried out unmonitored and unenforced. The Parish Council would like stringent conditions placed upon NEDDC to enforce and monitor this site effectively.

**Council’s Response**

Comments noted.

In circumstances of a potential breach of planning control the council will investigate the matter further and take any necessary steps to ensure compliance as appropriate.
<table>
<thead>
<tr>
<th>Site CAL/2301T - The Old Potato Store, Dark Lane, Calow</th>
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<tbody>
<tr>
<td><strong>Question 18.</strong></td>
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<tr>
<td><em>What would the ‘spare capacity’ of the site be in terms of pitch numbers and how would any future proposals be assessed?</em></td>
</tr>
<tr>
<td>1 comments received – 0 support – 1 object</td>
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</tbody>
</table>

**Issue: Spare capacity**

**Summary of Issues Raised**

- There is mention of spare capacity which leads me to believe further increases could be considered in months or years to come.

**Council’s Response**

Response to the above issue is covered in the Council’s Main Matter 15 response statement – Q18: spare capacity.
Site NW/2301T - Dark Lane, North Wingfield

**Question 19.**

Is the proposed allocation justified and appropriate in terms of its location?

| 4 comments received – 1 support – 3 object |

**Issue: Location, access to facilities and site size**

**Summary of Issues Raised**

- Why are extra spaces necessary when NE Derbyshire already has sites?
- Will council-tax payer's money be used to fund the site?
- Have all planning regulations been followed in this application?
- New traveller sites should have mini homes built on for those who like to visit and they should pay rent to be there to our local council.
- I do not want any more up there.
- North Wingfield PC would like to object to the site. Whilst acknowledging that travellers are already on the site, they are there without the relevant planning permission.
- The community believes that it is counter intuitive to put this site into the local plan just because it is already there. This appears to turn the planning system on its head.
- If the inspector deems this site suitable, the Parish Council and local residents would like a guarantee that this site will not grow and there will be a limit of 3 plots that are designated in this proposal.

**Council’s Response**

Response to the above issues are covered in the Council’s Main Matter 15 response statement – Q19: location, access to facilities and site size & Q23: spare capacity.

**Question 20.**

Can a satisfactory form of development be achieved having regard to the local environment; connections to utility services; access onto local highway network; adjoining uses; air and water quality, noise pollution, land stability and flood risk.

| 19 comments received – 2 support – 17 object |

**Issue: Location in relation to adjoining uses**

**Summary of Issues Raised**

- The site is relatively small and unlikely to have any significant landscape or visual effects.
- The site is already occupied by caravans, none have planning permission. Site currently used for horses, would have a visual impact on surrounding area.
- Compatibility.
- The proposed site is in green space surrounded by local farmer’s lands and is clearly visible.
- There is already G&T development on the proposed site, without permission.
- The site is part of an 'Ancient Enclosure - Fossilised Strip System' and therefore requires preservation and protection.
Site NW/2301T - Dark Lane, North Wingfield

### Summary of Issues Raised

- The site area and nearby brook is a vital habitat; hedgerows for many bird species and bat community and insects.
- Updated LAA Assessment, regarding bats, I do know that there is a considerable population of bats in the area.
- Concern over impact on environment and nearby wildlife.
- Current site is greenfield, brownfield should be used first.
- Concern over visual impact on adjacent houses. Consideration needs to be given to the scale, design and location of the development so the area is not adversely impacted.
- There is already Gypsy and Traveller development on Dark Lane. Original planning conditions have not be carried out or enforced.
- Measures need to be in place to ensure a planning application is complied by.
- Site has been occupied illegally already.
- Concern over impact on surrounding facilities and services of additional residents.
- Concern over impact on wildlife.
- To grant this planning would have a detrimental effect on the present environment.

### Council’s Response

Response to above issues are covered in the Council’s Main Matter 15 response statement – Q20: the local environment; adjoining uses.

The impact of the proposed use of the site on the landscape and biodiversity have been fully considered through the sustainability appraisal process.

The Sustainability Appraisal Regulation 19 Report (SubD3a) at paragraph 2.29.3 found the proposed use of the site would be unlikely to result in any adverse impacts on landscape and biodiversity assets.

Through the consultation it should be noted that Derbyshire County Council’s Landscape Team has commented that the site is relatively small and unlikely to have any significant landscape or visual effects.

### Issue: Access to site and any implications for the Public Right of Way and its users

- The approach road is an unsurfaced track, any extra traffic could take mud onto Dark Lane posing a danger to road users. Would the approach road be surfaced and extra lighting provided?
- Poor access, cars parked on both sides of the road, poor visibility on Dark Lane, Elyn Ave and Footpath both unsuitable.
- Objection to site. Access and exit would be to / from either Williamthorpe Close or Elyn Ave onto A617 a very busy Rd leading to M1. Both roads are through a residential estate leading to Dark Ln on a damaged surface.
- Numerous vehicles already use the track to get to the travellers site. Some of these drivers are careful, but others go very fast with little consideration to pedestrians on Dark Lane and the vehicles coming from Cromford Close.
Summary of Issues Raised

- Allowing more travellers pitches will increase the amount of vehicle using the track, during the day, night and early morning.
- Walkers using Dark Lane could be at risk due to an increase in traffic. Access onto site is poor and dangerous; the road is narrow. Emergency vehicles would have restricted and difficult access should it be required.
- The lane remains hazardous for pedestrians, with inappropriately parked cars on it.
- Consideration needs to be given to the impact of increased traffic from the site on local residents and area.
- Our main concern is the increase in traffic to the site. This access is already used by horse drawn vehicles, motor cycles, vans, horse boxes, forty ton articulated lorries, heavy low loaders with plant equipment and agricultural machinery.
- There is no separate provisions for pedestrians, as this is a well-used route leading to country walks and the Five Pits Trail.
- The access to the site is a small un-adopted narrow, unlit lane (no passing points, cars often parked on it) with a blind spot at a 90 degree bend. This lane is well-used and leads onto playing fields, whistle wood and the 5 pits trail. The road is unsafe.
- Concerns over access, lane is a single, unmade track, also designated as a public footpath. There is a blind bend in the track, and it is already well-used. There is no street lighting and cars parked along it. Access would be difficult.
- Potential safety issues regarding existing drives, and the junction with Cromford Close. The Bottom and Top of Dark Lane is not wide enough for 2 cars to pass. The Top is only a dust track! Walkers use the track to get to the Five Pits Trail, so if any traffic is coming from the small holding it can't be seen till it actually comes round the corner - dangerous for walkers. Also we have pony and traps and numerous horses going up and down Dark Lane, which is being used as a training track.
- There will be a significant increase in the volume of vehicle movement along Dark Lane. This increase will pose a risk to pedestrians many of who are elderly along the road and track/footpath 14.
- Footpath 14 is an unmade track, and is not suitable. Footpath already unsafe, extending the site will make this worse.
- Compatibility. This site should not be considered; the gypsy site opposite was refused planning permission for several projects; retrospective planning permission was granted subject to conditions none of which have been carried out, nor has the local council enforced them.
- Having more pitches could potentially cause problems and be a danger to members of the public using the site's single access track, which is a public right of way.
- The access does not meet the Equality Act 2010, a design and access statement should be undertaken to consider all needs, since the distance to a surfaced highway is 350metres.
**Site NW/2301T - Dark Lane, North Wingfield**

**Council’s Response**

Response to the above issues are covered in the Council’s Main Matter 15 response statement – Q20: access onto the local highway network.

It should be noted that Derbyshire Council as the local highway authority has raised no objection to the proposed use of the site subject to appropriate parking provision on site.

**Issue: Connections to utility services including water, electricity, gas and drainage**

**Summary of Issues Raised**

- The approach road is an unsurfaced track, any extra traffic could take mud onto Dark Lane posing a danger to road users. Would the approach road be surfaced and extra lighting provided?
- Poor access, cars parked on both sides of the road, poor visibility on Dark Lane, Elyn Ave and Footpath both unsuitable.
- Objection to site. Access and exit would be to / from either Williamthorpe Close or Elyn Ave onto A617 a very busy Rd leading to M1. Both roads are through a residential estate leading to Dark Ln on a damaged surface.
- Numerous vehicles already use the track to get to the travellers site. Some of these drivers are careful, but others go very fast with little consideration to pedestrians on Dark Lane and the vehicles coming from Cromford Close.
- Concern over effects on drains and sewerage.
- As far as we are aware there are no electricity, gas, water or drainage supplies.
- There is no mains water, mains sewer or septic tank on site.
- There is no electricity on site. They use generators which causes noise and disturbs residents.
- There is no natural gas to the site.

**Council’s Response**

Response to the above issues are covered in the Council’s Main Matter 15 response statement – Q20: connections to utility services.

In summary, it is considered that adequate utilities services exist or can be made available to serve the proposed use of the site. As such, it is considered that provision of utilities in relation to the site could be satisfactorily addressed by conditions on any planning permission.

**Issue: Air and water quality, noise pollution, land stability, flood risk and waste removal**
Summary of Issues Raised

- There are no flood risks associated with the proposed use of the site.
- Travellers are responsible for water issues and waste; they should respect local residents, their way of life, environment and county; there should be an agreement in place between Travellers, local residents and the Council.
- Suitability questioned, formally waste/unused strip of land, some light engineering work on site, possible asbestos contamination.
- Our next concern is drainage, there are no existing foul drains on the site. This is a worry as the land falls to the Brook, which could lead to pollution of the watercourse.
- The proposed site slopes down to a stream. Is this likely to become contaminated by waste?
- Concern over contamination of nearby stream and impact on wildlife and nature.
- Possible land contamination, supported by EO.
- There is no means of rubbish disposal/ parcel/postal deliveries.

Council’s Response

Response to the above issues are covered in the Council’s Main Matter 15 statement – Q20: air and water quality, noise pollution, land stability and flood risk. In terms of the issues of land contamination and disposal of refuse from the site, it is considered that both these matters could be satisfactorily addressed by conditions on any planning permission.

**Question 21.**

Is the proposed allocation deliverable within the plan period and has it been confirmed by the landowner as being available for the use proposed?

1 comment received – 0 support – 1 object

**Issue: Deliverability**

Summary of Issues Raised

- Local residents have not been given sufficient time to consider the application. Surely local residents should have been contacted directly by the Council.

Council’s Response

Disagree. The Council considers that it has carried out the gypsy and traveller consultation in line with requirements on behalf of the Planning Inspector.

The Council's Hearing Statement provides a comprehensive overview of the local plan consultation undertaken in relation to gypsy and traveller provision.
| **Question 22**  
| Are any additional measures or safeguards necessary to achieve an acceptable form of development |
| 0 comment received |

| **Question 23.**  
| What would the ‘spare capacity’ of the site be in terms of pitch numbers and how would any future proposals be assessed? |
| 0 comment received |
Site GT/06 – Greenway, Wingerworth

Question 24.

Would the proposed allocation be justified and appropriate in terms of its location including access to services and facilities and the site size?

25 comments received – 0 support – 25 object

Issue: Location & general issues

Summary of Issues Raised

- The location of the site is not sustainable and not appropriate for development as the local infrastructure is not supportive.
- The piece of land is completely unsustainable for a traveller site.
- This area is rapidly changing and is already overdeveloped with new properties being built and the strain being placed on it when more suitable brownfield areas are not.
- The addition of a traveller site is neglecting the wants of the people in the village and seems absurd and unfair. Site needs to accommodate the needs of both travellers and existing residents.
- There is already an established traveller site within a 3 mile radius of this area and there are others in the district. What are the benefits of having another site so close in such a built up residential area?

Consultation:

- No proper consultation has been under taken
- The Travelling Community needs to be consulted

Other issues raised:

- Concerns over light and air pollution of surrounding houses
- The residents of the site would be overlooked
- Concerns over business use on site and impacts on adjacent residential properties; to deny future travellers to work on site would be unfair.
- Some Travellers feel a need to have dogs that warn them of possible encroaching dangers.

Council’s Response

The Council who are landowners of this site have announced that they no longer intend to propose the site for Gypsy and Traveller pitches.

However the Inspector is clear that the site should remain part of the consultation, so that all matters can be discussed and addressed through the examination. The Council’s response to all issues raised in relation to this site are set out below.

Following the site selection process 2018, as described in the Updated Addendum to Gypsy & Traveller Topic Paper (ED44d), site GT/06 – Greenway, Wingerworth is one of only two sites which has been identified as a potentially suitable traveller site. The Council however acknowledges that the site has constraints (e.g. access issues) which would need to be addressed.

Although the Council acknowledges that the area has seen some residential developments in the past few years the identified traveller site is small in scale as it is designed for a
Site GT/06 – Greenway, Wingerworth

family-sized site. The Council considers that the proposed allocation is justified and appropriate in terms of its location as it is located on the edge of the Hunlocke Estate next to the A61 and has overall good access to education and health facilities (as further explained in the Council’s Hearing Statement for Main Matters 15, p. 17).

Site GT/06 shows no ‘major negative significance’ in the Sustainability Assessment of the Gypsy & Traveller Sites Assessments (ED44b). In terms of ‘Rural Barriers’ “site users would be expected to have good access to Hunloke Park Primary School, 930m to the north west of the site, and Tupton Hall Secondary School, 1.8km to the south of the site (SA Objective 6).”

Consultation process:
The six weeks consultation differed from previous Local Plan consultations, in that it formed part of the examination process and was run under the direction of the Inspector appointed to examine the Plan

In addition, neighbours of the proposed sites were sent a letter to make them aware of the relevant proposal.

This consultation was run in accordance with the Council’s adopted SCI and planning regulations and the Council has prepared a consultation statement to set out the steps it has taken.

Issues raised on
- ‘Business/commercial use’ are matters dealt with under Q24/ Site size,
- ‘Light and air pollution of surrounding houses’ under ‘Q25/ Light & Air pollution,
- ‘Future residents would be overlooked’, ‘impacts on adjacent properties’ and ‘dogs on site’ under Q25/ Adjoining uses

<table>
<thead>
<tr>
<th><strong>Issue: Access to Services &amp; Facilities</strong></th>
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<tbody>
<tr>
<td><strong>Summary of Issues Raised</strong></td>
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<tr>
<td>- The nearest facilities are all on the other side of the A61, including shops, schools and doctors. However both schools and the local doctors surgery are already struggling to cope. There are also increased demand on roads, community services, etc.</td>
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<tr>
<td>- Local facilities are therefore already at capacity and development would place further pressure on services.</td>
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<tr>
<td>- Concerns over wider impact of resources required to support travelling communities</td>
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<tr>
<td>- The Wingerworth area has reduced availability of police officers and increasing levels of crime.</td>
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</table>

**Other issues raised:**
- strain on local road network
- monitor potential issues that could occur between existing residents and travellers.
- Concerns over flooding
Site GT/06 – Greenway, Wingerworth

Council’s Response

The Council acknowledges that new development puts additional pressure on local services and facilities. However, in terms of site GT/06 it is a small scale development of four pitches only (see also the Council’s response on Q24/ Location.

Issues raised on
- ‘Strain on local road network’ matters dealt with under Q25/ Access,
- ‘Monitor potential issues between residents & travellers’ under Q25/ Adjoining uses
- ‘Concerns over flooding’ under Q25/ flood risk

Issue: Site size

Summary of Issues Raised
- The site is too small to accommodate four pitches; there is not enough space for self-run businesses and storage needs.
- It also needs clear space around the perimeter and between vehicles to comply with fire regulation, clear safe access for emergency vehicles and bin lorries, access road, parking spaces and turning areas.
- Horses and sometimes traps and carriages need space for grazing storing etc.
- Scale, design and location of the site is inappropriate and financially unviable but larger brownfield sites would provide better value for money.
- Caravans would result in an unacceptable density, for those using the site and for the immediate neighbours.

Other issues raised:
- Development would result in noise nuisance and invasion of privacy.
- Site not be in keeping with the local area.

Council’s Response

The Gypsy and Traveller Accommodation Assessment 2014 (GTAA, EB-G&T1b) provides a pitch definition. “Based on CLG Guidance, it can be determined that a pitch of approx. 325sqm would take into account all minimum separation requirements between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500sqm would accommodate the following on-pitch facilities:
- Hard standing for 1 touring/mobile caravan and 1 static caravan
- 2 parking spaces
- 1 amenity block
- Hard standing for storage shed and drying
- Garden/amenity area”

The site size of site GT/06 is 2400sqm including the existing footpath which would need to be retained.

Based on the above findings, the Council therefore considers that the remaining land could accommodate four pitches, each 500sqm in size. This would comfortably meet all traveller needs.

With regards to business use, the Council considers that no commercial activities shall take place on the land as the land is bounded by residential on three sides and any impact on local residents should be minimised.
### Site GT/06 – Greenway, Wingerworth

**Issues raised on**
- ‘Impact on privacy’ are matters dealt with under Q25/ Adjoining uses,
- ‘Noise nuisance’ under Q25/ Air & noise pollution,
- ‘Not be in keeping with local area’ under Q25/ Local environment

**Issue: Access & highway network**

**Summary of Issues Raised**
- A new access to the A61 Derby Road would be dangerous
- The new access would be opposite of a major new development. The proposed site cannot be safely accessed because it would interfere with the new access of the residential development.
- The A61 is already overloaded with traffic. Adding an extra access will cause more accidents and is dangerous for road users, pedestrians and potential site users.
- The A61 is already struggling with the increase of traffic from all the new developments being built in the area.

**Council’s Response**

These issues have been dealt with under on Q25/ Access.

**Issue: Loss of green space**

**Summary of Issues Raised**
- The site is currently a well-used play area for children and people exercising dogs in a safe, road free area.
- This residential area is already losing enough green space.
- Land left in perpetuity to the children of the Adlington estate, the Council has no right to allocate it.
- Historic application (for grazing ponies) on site dismissed due to access issues and amenity value. Why is it now appropriate for a Travellers Site?
- This site has a Public Footpath running across it - will this be closed off to residents from the Hunloke Estate?

**Council’s Response**

Less than 450m away from the site, there is Adlington Avenue play area with an equipped children’s play space (WING12B) combined with a housing green space and an informal recreational field (WING12A). The children's play space is of good quality and well equipped for younger and older children with two sets of swings, two multi frames, two benches, one zip line and a Basketball hoop. The informal recreational field is a large playing field with approx. 90m x 50m in size, is adequately maintained and clean but has no markings. All facilities are to the back of Hunloke Estate, away from any traffic.

In the 1950’s, site GT/06 was transferred to the Council but there is no absolute covenant that the land should be used as a children’s play space for local children.

If developed the existing footpath crossing the site from the A61 to Greenway would be retained.
Site GT/06 – Greenway, Wingerworth

Question 25.
Can a satisfactory form of development be achieved having regard to:

38 comments received – 1 support – 37 object

Issue: The local environment & general issues

Summary of Issues Raised

- DCC comment that the site is relatively small and unlikely to have any significant landscape or visual effects.
- The choice of this site is inappropriate, it is not fair to put the site there and it should be withdrawn.
- The site is completely unsuitable at the heart of a long established and quiet community. It is in the middle of a housing estate. The site is in an area of high housing demand and several hundred new houses are being built in the area.
- There would be no room to expand; the site will be quickly filled and would have no provision for emergency pitches or stop over provisions. The site offers no provisions for grazing live stocks and dogs and other animals.
- The diverse countryside aspects local residents currently enjoy will slowly disappear and it would cause extreme damage to the environment in the area.
- The use of this site as a traveller site would have a significant adverse impact on the landscape. The site is in no way in keeping with the area and surroundings in Wingerworth.

Consultation:
- Not enough time for consultation
- Planners of NEDDC should have consulted with Ministry of Transport
- Have the travellers and gypsy community been invited to the consolation events?

Other issues:
- The site is too small.
- Financial burden to local taxpayers to provide just 4 plots is inconceivable. The proposed site could be underused, ineffective and a waste of tax payers money.
- Gypsy Liaison Group confirmed preference for expansion of privately managed sites
- Traveller’s cultural way of living should be respected and considered
- Is there any evidence of need for a traveller site at this particular location?
- The proposed site is used by local residents as a green space and has a public footpath running through the site.
- Concern over impact on crime
- Concern over impact on property value and impact on the sales of new homes opposite of site
- Local services and utilities in the area are under pressure
- An influx of population would run the risk of increased noise pollution and reduced privacy.

Council’s Response

Issues raised on suitability of the site and consultation have been dealt with under Q24/ Location.
Site GT/06 – Greenway, Wingerworth

The findings of the Gypsy and Traveller Accommodation Assessment 2014 (GTAA, EB-G&T1b) show that gypsies and travellers prefer to live on a small family-sized site. This is also supported by the Derbyshire Gypsy and Liaison Group.

Site GT/06 is for a small family-sized site with four pitches. There are no plans to expand the site at any point in the future or provide emergency pitches. The site does not cater for grazing live stocks either but based on the GTAA’s pitch definition (as laid out in Q24/ Site size) a pitch of 500sqm provides for a garden/amenity area.

In terms of landscape, the County Council stated that “the site is relatively small and unlikely to have any significant landscape or visual effects.” The District Council considers that the site is a small infill site, surrounded by residential on three sides.

Other issues:
Concerns over impact on crime and property value are not planning matters.

Issues raised on
- ‘Site size’ are matters dealt with under Q24/ Site size
- ‘Local services under pressure’ under Q24/ Access to services & facilities
- ‘Environmental damage’ under Q25/ Biodiversity
- ‘Reduced privacy’ under Q25/ Adjoining uses
- ‘Noise pollution’ under Q25/ Air & noise pollution
- ‘Use as green space’ and ‘public footpath running through the site’ under Q25/ Loss of green space

Issue: Biodiversity

Summary of Issues Raised

Derbyshire Wildlife Trust raise no objection to the site in principle; concerns listed below:
- Site dominated by amenity grassland, with some scrub and trees along boundaries.
- Site is general of low ecological value, with the boundary features providing most interest.
- Site likely to be used by wildlife including birds, hedgehogs and foxes, however protected species constraints are unlikely. No badger setts noted, although some ‘push throughs' were recorded in west and north, possibly created by foraging badgers from setts in the local area.
- A (non-EIA) ecological impact assessment should be undertaken to accompany any planning application.
- It’s assumed that the development would result in the loss of the amenity grassland and potentially some of the western hedgerow for access.
- Where practicable, boundary vegetation should be retained, including the mature ash tree. All trees should be adequately protected with Root Protection Areas.
- Unlikely to be any ecological constraints significant enough to prevent development of the site.

Other Representation:
- Proposal would cause damage to the natural habitat, especially with all the new developments in the area.
Site GT/06 – Greenway, Wingerworth

Council’s Response

Derbyshire Wildlife Trust (DWT) undertook a site visit in January 2019 to ensure that their previous comments are accurate. DWT confirmed that “the site is general of low ecological value, with the boundary features providing most interest.” The Council notes DWT’s findings and takes into account its suggestions to:

- Undertake a (non-EIA) ecological impact assessment as part of any planning application,
- Where practicable, boundary vegetation should be retained, including the mature ash tree.
- All trees should be adequately protected with Root Protection Areas.

Issue: Connections to utility services including water, electricity, gas and drainage

Summary of Issues Raised

- The proposed site would put more pressure on local resources, infrastructure & amenities which will already be stretched pressure due to large housing developments in the area.
- Local schools are already oversubscribed and cannot cope with the extra places needed.

Council’s Response

Issues raised on pressure on local infrastructure and amenities have been dealt with under Q24/ Access to services and facilities.

Issue: Access

Summary of Issues Raised

Representation of Derbyshire County Council (statutory consultee, summary by officer):

- A satisfactory access is not achievable from Greenway, due to insufficient width, at the site boundary with the publicly maintainable highway.
- When taking account of the planned changes to the road layout associated with the consented housing site opposite the proposed site, the provision of a safe access direct from the A61 is not possible.

Summary of Representations:

- A new access to the A61 Derby Road would be extremely dangerous and inappropriate as it is right on the bend on the bottom of a hill within a 50 mph zone.
- Caravans/ mobile homes move slowly and would need a suitably large turning circle/space to allow entry and exit from the site. The assessment fails to mention the planned A61 roundabout and the blind hill which makes large vans onto the site problematic.
- This stretch of the A61 is icy and treacherous in winter and previous application for play equipment was refused due to no safe vehicle access.
- The new access would be opposite of a major new development. The proposed site cannot be safely accessed because it would interfere with the new access of the residential development. Even Highways have now concluded that this would be inappropriate.
Site GT/06 – Greenway, Wingerworth

- The A61 has already extremely heavy traffic every morning and evening and has had several road traffic accidents. Adding an extra access will cause more accidents and is dangerous for road users, pedestrians and potential site users.
- The A61 is already struggling with the increase of traffic from all the new developments being built in the area. The proposed site will further add to the high traffic levels.

Other issues:
- It will increase litter and air pollution

Council’s Response

In the Council’s Hearing Statement for Main Matters 15 (p. 18) it is stated that “the County Council initially considered that there was potential for some form of direct access to the A61, Derby Road but raised concerns with regards to the potential impact on the existing highway and exit visibility. Subsequently, a speed survey was commissioned by the District Council which revealed that a satisfactory level of visibility was achievable. However, at a later stage, the County Council took also into account the proposed access of a residential development on the opposite side of the A61 which raised highway safety issues. The County Council considered two different potential solutions but neither was feasible. The County Council therefore determined that the provision of a safe access to the A61 was not possible.

Issues raised on
- ‘Increase of air pollution’ are matters dealt with under Q25/ Air & noise pollution

Issue: Adjoining uses & privacy

Summary of Issues Raised
- The proposed site is too close to adjoining properties and its impact seems to be completely disregarded
- It will have an impact on privacy of the existing residents on Greenway as they will be overlooked by the travellers and the travellers will have no privacy as they will also be overlooked.
- The proposed site would be visible from the main road as much of the hedges will be lost due to access.
- There would be an impact on community cohesion and the current village like atmosphere as the proposed site sits too close to the established housing.
- Traffic and commercial vehicles using the site would cause disruption to neighbouring residents.
- The proposed site will have a significant detrimental impact on the market value of local properties.

Other issues:
- Disruption and noise nuisance to those using the site and those neighbouring
- The site is a well-used field by local children to play in.
- Residents use the public footpath across this land and would be reluctant to use this path for safety reasons.
- Large residential developments already in the area
- I believe this has the potential to sever the community as there would be a reluctance to use this path for safety reasons.
Council’s Response

The Council acknowledges that the site GT/06 is surrounded by residential uses on three sides. As stated however in Q16 (Compatibility) of the Traveller LAA site assessment (Appendix 5 of ED44d) the site gives a reasonable amount of privacy due to the existing hedges along the A61, a few mature trees and shrubs along the northern boundary and walls and fences to the east and south side of the site.

Issues raised on
- ‘Commercial use/ vehicles’ are matters dealt with under Q24/ Site size,
- ‘Well-used field’ and ‘public footpath’ under Q24/ Loss of green space,
- ‘Noise nuisance’ under Q25/ Air & noise pollution,
- ‘Large residential developments’ under Q25/ Access

Issue: Air and water quality, noise pollution, land stability and flood risk

Summary of Issues Raised

Representation of Derbyshire County Council (statutory consultee, summary by officer):
- There are no flood risk issues associated with the proposed use of the site.

Summary of Representations:
- Drainage system is already at full capacity.
- Existing problems from surrounding developments are causing surface water flooding. After a heavy rain storm this stretch of the A61 is flooded.
- The proposed site is prone to becoming marshy and flooded during bad weather. Any potential additional hard-surfacing would increase the level of surface water flooding.
- Concern that the site could be unsuitable due to former mine workings
- Concern over effects on the environment, and noise and air pollution which could impact the health and well-being.

Council’s Response

Site GT/06 scored ‘green’ for Q3 (Flood risk) of the Traveller LAA site assessment (Appendix 5 of ED44d) which means there is neither a flood risk (Flood Zone 2 and 3) nor a risk of surface water flooding on site. There is however a medium/high risk of surface water flooding outside of the site along the A61.

As Q13 (land stability) of the Traveller LAA site assessment indicates the whole site is located within a development low risk area.

The proposed site is a small family-sized site. As stated in Q24/ Site size the Council considers that no commercial activities shall take place on site. Therefore, potential noise and air pollution to the area is considered to be low.

Issue: Loss of green space

Summary of Issues Raised
- The site is currently a well-used play area for children and walkers
- This densely populated residential area has already lost enough green space; a further loss of this highly valued green space would be detrimental to local children and other residents.
Site GT/06 – Greenway, Wingerworth

- There is a covenant on this land to be used for children to play on; it was a condition of the original planning permission that it be retained as green space.

Council’s Response
Issues raised on ‘loss of green space’ have been dealt with under Q24/ Loss of green space.

**Question 26.**
*Is the proposed allocation deliverable within the plan period and has it been confirmed by the landowner as being available for the use proposed?*

1 comment received – 0 support – 1 object

**Issue: Contradict national planning policy**

Summary of Issues Raised
- Loss of green space would be against national planning policy (paragraph 97 of the 2018 NPPF)

Council’s Response
Site GT/06 is an area of incidental open space. It is a grassed area with no equipment or planting. It is not used as a formal recreation area and is not allocated for such purposes in the existing or emerging local Plans. The site has no other protection or covenant restricting the use of the site for recreation purposes and hence development of the site would not be contrary to the NPPF.

**Question 27.**
*Are any additional measures or safeguards necessary to achieve an acceptable form of development?*

1 comment received – 0 support – 1 object

**Issue: Safe access from the A61**

Summary of Issues Raised
- Further justification would be required to demonstrate that safe access could be achieved to and from the A61
- Further measures would be required to demonstrate that the site would have no detrimental impact on surface water runoff in the local area.
- Further assessment would be required to demonstrate where new provision could be provided.

Council’s Response:
The issue of ‘safe access’ has been addressed in Q25/ Access, ‘surface water runoff’ in Q25/ Flood risk and ‘public open space’ in Q26/ Deliverability.
Site GT/09 – Temperance Hill, Woolley Moor

**Question 28.**

*Would the proposed allocation be justified and appropriate in terms of its location including access to services and facilities and the site size?*

170 comments received – 0 support – 170 object

**Issue: Location & general issues**

**Summary of Issues Raised**

- The location of the site would be totally unsuitable for use as a traveller site as it would not be in keeping with the surrounding area which has a countryside character and appearance, and feels physically separated from the village. Woolley Moor is a small and quite settlement but the site is not inclusive for a large demographic.
- With housing adjacent and opposite the proposed site, the site should be classed as within the centre of the village.
- The potential for work and access to schools and shops are required. A more populous, industrious area with a more varied population would certainly be preferable.
- The Council would discriminate against an underprivileged group as it is intended to place any families or elderly persons wishing to use the site away from basic services and out of sight. An allocation of the site would not meet the needs of travellers. There is little chance of permanent or casual labour in the immediate area.
- Woolley Moor is already contradicted by the local plan in terms of the limited nature of its sustainability (Level 4 settlement). This would indicate that the site is neither suitable nor sustainable.
- The site is inappropriate for the intended use and not in accordance with national and local planning policies and therefore it should not be allocated. The government considers traveller sites in rural areas not suitable and contrary to the council's assessment of the area.
- An allocation would be against the wishes of the local communities and there would be no benefit for the village in having a traveller site. Reverting to its original use would be a more acceptable option. The beauty and idyllic way of life in Woolley Moor should be defended and maintained and the history of the site must be respected.

**Consultation process:**

- The consultation efforts to engage with local residents have been inadequate and not in accordance with planning rules.
- Local residents have received no notification from the Council. They have not received enough information or time to consider this proposal.
- The residents have had to work out themselves how to access the information and not sufficient time has been given.
- The consultation shows disrespect for both the process and the environment together with those who are affected by it.

**General issues:**

- No information about how site would be maintained and paid for (refuse collection, implementation of utilities, services and the necessary upkeep).
- Precedence of rejected planning applications.
Site GT/09 – Temperance Hill, Woolley Moor

Council’s Response

Following the site selection process 2018, as described in the Updated Addendum to Gypsy & Traveller Topic Paper (ED44d), site GT/09 – Temperance Hill, Woolley Moor is one of only two sites which has been identified as a potentially suitable traveller site. The Council however acknowledges that the site has constraints (e.g. impact on landscape quality) which would need to be addressed.

As laid out in ED44d (paragraph 2.7 to 2.9) the Council initially screened approx. 3,230 sites of public land. Due to the large amount of sites, step 1 and 2 of the site selection process were therefore broad brush and focussed on site screening based on absolute constraints, i.e. built-up sites, Green Belt, flood risk, etc. and primary criteria such as location, suitability and compatibility. For example, in terms of location, sites in rural areas were discounted if they were located either more than 500 metres away of any settlement or within a village centre. Site GT/09 is in close proximity to Woolley Moor (c. 230m as the crow flies or c. 350m along Temperance Hill) but not in the village centre. There are no absolute constraints affecting the site. Site GT/09 therefore passed both screening stages and was taken further to the site assessment.

Site GT/09 was assessed in detail through the Traveller LAA site assessment based on the updated LAA methodology from 2017. This included modified or new criteria to assess traveller sites in more detail (see response to Q12 in Council’s Hearing Statement on Main Matter 15). Modified criteria Q4 (Location) confirmed the initial screening results which means that site GT/09 is less than 250 metres away from a settlement without a SDL. As part of this, the site assessment also includes a specific criteria which proposes a site scale of area in relation to the nearest settlement (Q22). Compared to Woolley Moor the site size of GT/09 is approx. 1.5% of the settlement area and 15% if compared to the row of houses along Temperance Hill.

This approach is supported by the national Planning Policy for Travellers (PPTS) which states in paragraph 14 that “when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settlement.”

In terms of sustainability of the location the Council does not dispute that Woolley Moor is a very small village with very limited sustainability (Level 4 settlement within the Settlement Hierarchy). However, due to the difficulty of identifying sufficient suitable sites in Level 1 to 3 settlements to meet identified needs, it was necessary to further investigate potential sites within Level 4 settlements.

Following this process, the Council considers that the proposed allocation is justified and appropriate in terms of its location.

Consultation process:

The consultation on proposed Gypsy & Traveller sites and supporting documents differed from previous Local Plan consultations, in that it formed part of the examination process and was run under the direction of the Inspector appointed to examine the Plan. Local residents were invited to comment on the proposals within a 6 week period, ending on 15 February 2019.

Any comments on the documents and proposed sites were made by responding to the Inspector’s Matters, Issues and Questions (MIQs) that are listed in the MIQs document. The Inspector had also provided a Briefing Note to explain the process in more detail.
Site GT/09 – Temperance Hill, Woolley Moor

During the consultation, the copies of the Inspector’s MIQs, the Inspector’s Briefing Note and the Gypsy & Traveller documents were available to view on the council’s website and local libraries throughout the district.

In addition, neighbours of the proposed sites were sent a letter to make them aware of the relevant proposal.

This consultation was run in accordance with the Council’s adopted SCI and planning regulations. The Council has prepared a consultation statement to set out the steps it has taken.

General issues:
Where appropriate, the site’s maintenance would be addressed by planning conditions as part of any planning consent.

Issues raised on
• ‘GTAA methodology’ and ‘need for pitches’ are matters dealt with under ‘Q7/ Assessing the level of need’,
• ‘Services and facilities’ under ‘Q28/ Services & facilities’,
• ‘Ogston Reservoir’ and ‘impact on beauty of area’ under ‘Q29/ Local environment’,
• ‘Loss of green area’ and ‘stream feeding into reservoir’ under ‘Q29/ Biodiversity’
• ‘Access/ unsafe road’ and , ‘unnecessary car journeys’ under ‘Q29/ Access’
• ‘Close to neighbouring houses’ and ‘site well used by local residents’, ‘need for play area’ under Q29/ Adjoining uses’
• ‘Demolition of houses ” and ‘the site’s condition’ under ‘Q29/ Pollution, flood risk’

Issue: Access to services & facilities

Summary of Issues Raised

• Woolley Moor is isolated and it is only a small village which lacks infrastructure, services and facilities. It is hoped that a more appropriate location could be found which is better situated next to nearby villages.
• Other than a primary school, a church and a pub there are no shops, no post office, no doctor’s surgeries or any other public facilities (i.e. community centre) and no secondary school. Contrary to the Council’s site assessment there is not a post office in the village.
• The nearest GP Surgery is at Ashover and the nearest dentist is in Clay Cross. The nearest A & E being at Calow near Chesterfield.
• There are some local services (shops, village hall) in Stretton but they are very basic. Future residents would have to travel further to Clay Cross for more services. Score of Q25 of the site assessment should be red.
• Employment opportunities are also much diminished and the site does not have space for business activities and such activities would impact on local amenity.
• The buses run very infrequently during the daytime and even less so in the evening. Public transport is not convenient to be able to access a nearby town and has been in danger of being suspended altogether due to lack of use.
• Woolley Moor is beyond walking distance from any main settlement or any key services. The car is the only realistic transport option. This leaves future travellers stranded on site unless they are willing to drive to access many amenities.
Site GT/09 – Temperance Hill, Woolley Moor

- There are concerns regarding the cost to the Council of extending utilities out to such a rural place. My understanding is that these sites must have certain local amenities which are not available in this area.

Council’s Response

As laid out in the Council’s Hearing Statement on Main Matters 15 (Q28), site GT/09 is in close proximity to Woolley Moor and Stretton Handley C o E Primary School is less than 500m away from the site. On the east side of the site along Temperance Hill there is a bus stop with a bench and post box. The site is around 2.7km away from the A61.

Other local services and facilities are further away:
- Pharmacy. The closest pharmacy is located in Clay Cross, approx. 2.91km from the site.
- GP surgery. The closest GP surgery is situated in Ashover, approx. 2.90km away
- Post Office. The closest Post Office is located in Ashover, approx. 3.06km away
- Shop. There is a gas station combined with a shop situated in Stretton, approx. 2.22km away

The results of the Sustainability Appraisal of the Gypsy & Traveller Sites Assessments (ED44b, chapter 3.17) scores for both SA Objective 6 (Rural Barriers) and SA Objective 8 (Health) ‘minor negative’ (light red score ‘-‘).

In Q25 of the site assessment (Appendix 5 of ED44d) undertaken for site GT/09 it is stated that “Stretton Handley C o E Primary School and a post office is less than 500m away from the site.” Whilst this a correct assessment for the Primary School it is not for the post office. Instead there is only a post box in the village centre.

With regards to public transport, bus service 63/63A runs from Chesterfield via Woolley Moor to Matlock. There are seven buses a day from Monday to Friday. There is an hourly service in place from 10am to 2pm. There are four buses on Saturdays but no service on Sundays.

There is also a school bus (109) which runs from Monday to Friday.

In terms of employment opportunities, it is part of the Gypsies & Travellers’ culture to travel for work, sometimes far from where they live and for a longer period (weeks or even months). Any gypsy & traveller family would not be able to work on site GT/09 but would find it helpful to be able to access the A61 within less than 3 km.

In summary, Stretton Handley C o E Primary School is in close proximity to the site but other services and facilities are further away. However, both the A61 and Ashover are less than 3km away from the site and those facilities are accessible by bus services.

Issues raised on
- ‘Suitability/sustainability of location’ and ‘Woolley Moor is a level 4 settlement’ and similar comments are matters dealt with under Q28/ Location,
- ‘DCLG Good Practice guidance’ under ‘Q28/ Sit size’,
- ‘No services on site’ under ‘Q29/ Connections to utility services’
- ‘Dangerous for pedestrians’ under ‘Q29/ Access’
- ‘Existing footpath’, ‘impact on adjacent residents’ under ‘Q29/ Adjoining uses’
Issue: Site size

Summary of Issues Raised

- The site is unsuitable for development due to its small size and is bordered at the rear by a steep bank and to the south there are stone cottages.
- The site size is too small to accommodate large vehicles such as static home, touring caravan and a utility building together with parking for vehicles, as well as for visitors. Some traveller sites also require facilities for storage and amenity areas. All of which would reduce the size considerably.
- Fire regulations would also render useful area even smaller. It recommends an open boundary around the perimeter of the site for safety reason. This reduces the site size further.
- There are concerns over how the size is capable of fitting 3 pitches safely and in compliance to the area. The site would be reduced by the footpath/trail in the north, appropriate hedging along Temperance Hill to protect the local environment and adjacent houses and a suitable turn on site.
- It is believed that the site size is less than 1,500 sqm. When measuring the site it falls way short of the actual size as outlined in the government's recommendations (Good practice Guide 2008). The Council does not consider trees, hedges or the drainage passage on the site.
- Small sites such as this may quickly become overcrowded. Surrounding roads may become congested and cars parked along the road.
- Would gypsy and travellers want to live on a site that probably only just meets the minimum for space requirements? Surely, the gypsy and traveller community require larger spaces to accommodate their amenities.

Council's Response

The Gypsy and Traveller Accommodation Assessment 2014 (GTAA, EB-G&T1b) considers in part 5, Stakeholder Consultation that "small, family-sized sites were both the preferred choice of Gypsies and Travellers and were less likely to provoke tensions with the settled community (paragraph 5.10)."

The GTAA 2014 also provides a pitch definition. "Based on CLG Guidance, it can be determined that a pitch of approx. 325sqm would take into account all minimum separation requirements between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500sqm would accommodate the following on-pitch facilities:
- Hard standing for 1 touring/mobile caravan and 1 static caravan
- 2 parking spaces
- 1 amenity block
- Hard standing for storage shed and drying
- Garden/amenity area"

The Council therefore considers that a pitch size of 500sqm can comfortably meet all traveller needs. Based on the above findings, it is also considered that a family-sized site would usually comprise three to four pitches. This would feature a site size between 1,500 to 2,000sqm.

Woolley Moor’s total site size is approx. 3,800sqm but the larger part to the west is woodland and slopes down to the brook and is therefore excluded. The remaining site size is approx. 1,500 sqm. which could provide a family-sized site with three pitches.
It is acknowledged however that the planting of a hedgerow along Temperance Hill (as discussed in in more detail in Q29) would need some space but this would only amount to approx. 50sqm (hedge length 35m x 1.5m width). There is already a well-established hedgerow to the south side of the site which separates the land from the adjacent house. To the north, along the site’s boundary there are trees and shrubs and a footpath.

Issues raised on ‘Sustainability and ‘consultation’ are matters dealt with under Q28/ Location, ‘Sensitive location’ and ‘safety issues’ under ‘Q29/ Local Environment’ ‘Stream into Ogston Reservoir’ under ‘Q29/ Biodiversity’, ‘Poor access’ under ‘Q29/ Access’ and ‘Site is green space’ under ‘Q29/ Adjoining uses’.

**Issue: Co-existence between Travellers and the local community**

**Summary of Issues Raised**

- Site dominates the settled community
- Site size of 3 pitches
- Lack of services/ shops
- Impact on Ogston Reservoir and tourist industry
- Impact on privacy of adjacent residential, site to close to residential and privacy issues for future residents
- Footpath and trails
- Noise and light nuisance cause by proposal

**Council’s Response**

Issues raised on
- ‘Site dominates settled community’ are matters dealt with under ‘Q28/ Location’,
- ‘Site size’ under Q28/ site size
- ‘Lack of services/ shops' under ‘Q28/ Services & facilities’
- ‘Ogston Reservoir’, ‘tourist industry’ under ‘Q29/ Local environment’
- ‘Impact on privacy of adjacent residential’, ‘site to close to residential’, ‘privacy issues for future residents’, ‘Footpath and trails’ under ‘Q29/ Adjoining uses’
- ‘Noise and light nuisance’ under ‘Q29/pollution’

**Issue: Road network**

**Summary of Issues Raised**

- Temperance Hill is narrow with junctions at each end which have reduced visibility/ blind spots
- Large vehicles might find it difficult to manoeuvre
- Additional traffic could cause potential highway safety issues for pedestrians and walkers, also due to more parked vehicles
- In winter pavements and street lighting are in short supply.
- Additional traffic is also likely to increase noise and pollution.
- Needs easy and unrestricted access for emergency vehicles
- Access to Temperance Hill is difficult and dangerous
- Visibility splays difficult to achieve
- Severe weather would make location quite isolating
### Council’s Response

Issues raised on
- ‘Narrow lane’, ‘junctions with reduced visibility’, ‘difficult for large vehicles’, ‘potential highway safety issues’, ‘lack of pavements and street lighting’, ‘visibility splay difficult to achieve’, ‘Access to Temperance Hill is difficult and dangerous’, ‘emergency vehicles need easy access’ are matters dealt with under Q29/ Access,
- ‘Additional traffic causes noise pollution’ under Q29/Noise pollution
- ‘Location quite isolating’ under Q28/Services & facilities

### Issue: Local character & landscape

**Summary of Issues Raised**

- The site would significantly harm the landscape
- Rural location in a Special Landscape Area
- Affect the character of the village, caravans not in keeping with stone buildings
- Site assessment does not demonstrate an understanding of impact on local area/ landscape
- Site has a public footpath/ Woolley Moor trail
- Close to Ogston Reservoir which is a tourist attraction and public views towards the site
- Area has great natural beauty
- Development on site could negatively impact wildlife.

### Council’s Response

Issues raised on
- ‘Site significantly harms the landscape’, ‘site impacts on built environment’, ‘Special Landscape Area’, ‘Ogston Reservoir, a tourist attraction and views’, ‘Area has great natural beauty’ ‘Site assessment/appraisal’ are matters dealt with under Q29/ Local environment & landscape
- ‘Negative impact on wildlife’ under Q29/ Biodiversity
- ‘Site has a public footpath’, ‘Part of Woolley Moor Trail’ under Q29/ Adjoining uses

### Issue: Local Wildlife

**Summary of Issues Raised**

- Wildlife would be adversely affected

### Council’s Response

Issues raised on
‘Wildlife’ negatively affected’ are matters dealt with under Q29/ Biodiversity

### Issue: Pollution risks

**Summary of Issues Raised**

- The waste discharged from outfall from trailers may contaminate stream and Ogston Reservoir.
- Ground conditions and levels of land - sloping ground which can increase risk of runoff into brook and reservoir.
Issue: Impact on children

Summary of Issues Raised

- If Greenway site is turned into a traveller site, children will not only lose vital safe play space but be exposed to a higher level of traffic

Council’s Response

Officer’s interpretation:
This representation relates to Site GT/06 – Greenway, Wingerworth and is dealt with under Q24/Location.

Question 29.
Can a satisfactory form of development be achieved having regard to:

208 comments received – 1 support – 207 object

Issue: Local environment & impact on landscape quality & general issues

Summary of Issues Raised

Impact on local environment & landscape quality:

- This beautiful area features undulating hills and slopes surrounding a valley holding Ogston reservoir. Most properties are old stone cottages which were left unscathed when the reservoir was built in the 1950's. The site is typical of the area, a field surrounded by hedging and stone walling and a stream runs next to the site. It is very much part of the surroundings and its rural character and is in a prominent and visible location. The views of the surrounding landscape from the site are currently enjoyed by local residents and visitors alike.

- The area lies within a designated Special Landscape Area, is an area of recognised important and attractive landscape character and identified as an Area of Primary Sensitivity (AMES) in relation to ecological features, visual unity and historic environment.

- The proposal is not in keeping with the local environment, the landscape character or with the nearby properties. It would have a significant adverse impact on the sensitive environment, the landscape quality and would not complement the existing built environment. This would be recognised by the Council themselves.

- The proposal would impact on public views around Woolley Moor and nearby Ogston Reservoir and on those in surrounding properties. The site can be overlooked by passers-by and local residents and would detract them from the natural beauty of the countryside.

- The area and Ogston Reservoir attracts many tourists because it is well-known and an area for water sports and fishing and it is rare to find such an unspoilt location as this. A development would reduce the enjoyment of the many tourists and visitors and would affect local businesses in tourism.

- The proposal would also present a very different visual aspect (built intrusions of caravans, vehicles and boundary treatments) and represent an urban encroachment into a rural, historic and attractive landscape. It would compromise the appearance of a well-integrated old country lane and impact on the village.
- It is assumed that the entire area would need to be concreted ruining the rural nature of the area and causing harm to the environment and would ruin the rural hamlet of Temperance Hill.
- Proposal is contrary to national and local policies that seek to conserve landscape and to maintain green space which is typical of the Derbyshire countryside.

**Landscape appraisal:**
- Agree with the landscape appraisal that any development of the proposed site is unlikely to be able to be brought forward without adverse effects on the landscape character of this LCT and the visual amenity of receptors within the local context. Score of Q19 of the site assessment should be red.
- Footpath has not been accounted for in the Landscape Appraisal. The landscape appraisal which was only desktop-based also suggests that any mitigation will markedly impact the woodland.

**Concerns about mitigation measures:**
- Suggested mitigation measures would have no effect, the harmful impact on the local landscape cannot be mitigated. Due to the width of access needed, the site will be fully visible from the road. Planting hedges would in itself affect the sensitivity of this landscape.
- Planted hedgerow to low, therefore traveller site still being visible from an elevated position. Hedgerows with over 3 metres in height will be impossible to fulfil the requirements of the LG guidelines.

**Additional measures or safeguards:**
- The site should provide for removal of business waste, vehicle parking and trailer storage, space for business materials storage, pollution control, natural and effective screening of the site, and that the footpath is still accessible.
- Any caravan should not stand nearer the road than the existing buildings line defined by neighbouring cottages.

**General issues:**
- Why is this grass land being taken away from the village and resident users?
- Given the possible impact on the area, more time and more readily accessible information is essential to the process. The Council has tried to put this through at the last minute and not even said why the site was proposed.
- Other sites have been discounted on similar criteria, e.g. sensitive location, the site has been unfairly treated compared to many other proposed sites with fewer problems. The site should not be considered when it should have been discounted at step 1 in the selection process.
- There is a steep and dangerous incline down to the stream, this could pose a health and safety risk.

**Council’s Response**

The Council acknowledges that the site is part of an area which is identified as an Area of Primary Sensitivity within the Areas of Multiple Environmental Sensitivity Study (AMES). The Sustainability Appraisal of the Gypsy & Traveller Sites Assessments (ED44b) also indicates that “the site could be potentially visible from surrounding areas” and “the proposed site use could potentially alter the landscape character of the local area, however, due to the proposed site use and screening around the site, a minor negative score is awarded (SA Objective 11).” Therefore, the Council...
commissioned Lepus Consulting Ltd to carry out a Landscape Appraisal to investigate the site further.

The Landscape Appraisal (ED44c) concludes that proposals such as Gypsy and Traveller Accommodation are unlikely to be able to be brought forward without adverse effects on the landscape character of this Landscape Character Type (LCT) and the visual amenity of receptors within the local context. There is the potential for tree and other planting to mitigate some of the potential effects on views towards the site. However, the local landscape context to the site is considered to have a unified character with key features that are representative of the Wooded Valleys and Slopes LCT. Proposals which do not respect or enhance the local context, such as Gypsy and Traveller Accommodation, are likely to have an adverse effect on the character of this sensitive landscape” and would therefore need mitigation measures (as laid out in ED44c on page 6 and the Council’s Response to MIQ’s on page 21). The Council considers that by retaining the hedgerows on the south side of the site, trees and shrubs along the western and northern boundary and by planting a new hedgerow along Temperance Hill, adverse impacts on the landscape can sufficiently be mitigated.

Mitigation measures shall be imposed during the planning application process such as planting of a hedgerow along Temperance Hill, appropriate drainage and no commercial activities on site.

The Sustainability Appraisal and many respondents also suggested that the site could potentially be visible from surrounding areas. The Council does not dispute this, but considers that caravans are less visible due to their lower height compared to houses and can be more easily screened by appropriate planting.

Issues raised on
- ‘Not up-to-date GTAA’ are matters dealt with under Q1/ GTAA update,
- ‘Site’s location & sustainability’, ‘restricted business use’, ‘consultation process’ and ‘plan making & methodology’ under Q28, Location & general issues
- ‘No facilities in the village’, ‘Woolley Moor classified as Level 4 settlement’, ‘very limited bus service’ under Q28/ Access to services & facilities
- ‘Planted hedgerow reduces site size’, ‘site cannot enable maximum use’ and ‘site is totally inadequate’ under Q28/ Site size
- ‘Proposal dominates nearby cottage’ and ‘massive influx of population’ under Q28/ Location
- ‘Loss of green area’, ‘close to Ogston Reservoir & wildlife’, ‘ecology of the area’, ‘Reservoir is Site of Special Scientific Interest (SSSI)’ under Q29/ Biodiversity
- ‘Site well used open space/ village green’, Attractiveness/ site used by local residents’, ‘Woolley Moor Trail runs through the site’, ‘historical importance of footpath’ under Q29/ adjoining uses & privacy.

Issue: Biodiversity

Summary of Issues Raised

Representation of Derbyshire Wildlife Trust (statutory consultee, summary by officer): No objection to the site in principle; concerns are listed below:
- Site comprised wholly of amenity grassland (low intrinsic ecological value).
  Evidence of badger activity, but no badger sets identified on site.
- An (non-EIA) ecological impact assessment should be undertaken to accompany any planning application.
- Development would likely result in loss of grassland. Southern hedgerow and northern trees should be retained, and woodland to west adequately protected.
- Human disturbance could impact on woodland.
- Drainage should be carefully considered to ensure pollution impacts to the stream and potentially Ogston Reservoir are fully assessed.
- Unlikely to be any ecological constraints significant enough to prevent development of the site, however development has the potential to be detrimental to the adjacent woodland and cause a minor loss of foraging habitat for local wildlife.
- Mitigation/compensation measures may be necessary to achieve this.
- Site in 'Area of Primary Sensitivity', due to the landscape character of the site and surrounding area, rather than ecology.

Summary of Representations:

Ogston Reservoir, Site of Special Scientific Interest and protection of wildlife:
- Site is in an area of natural beauty, and in close proximity to Ogston Reservoir which is a Site of Special Scientific Interest (SSSI), well-known for wildlife. The reservoir is a sensitive habitat for birds, ducks and geese; it has recorded over 200 species of birds and is home to an abundance of wildlife. This is a safe haven for many species which attracts many tourists and bird watchers.
- A massive increase of population combined with contamination and noise will threaten the birdlife of Ogston Reservoir. The impact on the area from the proposal would be significant to the wildlife and potentially damaging and therefore this development should be reconsidered.
- The site contains a stream which feeds into Ogston Reservoir, a source of drinking water which could threaten the wildlife habitats of Ogston Reservoir and the stream (newts, crayfish, frogs, toads, etc.).

Local wildlife on site & in the area:
- There is a large badger population in this area and the Wildlife Trust are against any disturbances to the local wildlife. The proposal could however cause lights and noise nuisance.
- There are a lot of different species, e.g. foxes, badgers, stoats, etc. present around this area which should not be disturbed.
- Some of the nearby local hedges are up to 500 years old, there is a varied ecology.
- The site is has been a valuable natural habitat, peaceful and tranquil and inhabited by lots of wildlife and wildflowers. Potential impacts on wildlife on site and in surrounding area, e.g. badger setts, owls, etc.
- Loss of grass area and natural habitats. Concerns about contamination to ground aquifers and wider environmental impacts on wildlife and vegetation. Has ecological assessment/ survey been done?

Council’s Response

Derbyshire Wildlife Trust (DWT) undertook a site visit in January 2019 to ensure that their previous comments are accurate. DWT confirmed that “the site is comprised wholly of amenity grassland, which is of low intrinsic ecological value.” However, the Council takes into account DWTs’ suggestions to
- undertake a (non-EIA) ecological impact assessment as part of any planning application,
- carefully consider drainage issues with regards to the stream and Ogston Reservoir,
Southern hedgerow and northern trees should be retained, and woodland to west adequately protected

DWT also states that “the site is located in an ‘Area of Primary Sensitivity’, however this is largely related to the landscape character of the site and surrounding area rather than ecology.”

The Council notes DWT’s findings and the need to fully assess drainage issues to ensure that any potential pollution of the nearby stream and Ogston Reservoir is fully assessed. This would need to be ensured through planning conditions associated with any planning consent.

Issues raised on
- ‘Ogston Reservoir attracts many visitors’ are matters dealt with under Q29/Local Environment & Landscape quality
- ‘The site is a path’ and ‘the only recreational public space’ under Q29/Adjoining uses

### Issue: Connections to utility services

#### Summary of Issues Raised

- There are currently no utility services on site (no running water, no electricity and no waste or sewage disposal facilities) and therefore proposed location of the site is not sustainable.
- Access to mains water would require the agreement of local landowners and high costs per pitch are expected.
- Utility services are usually at capacity; especially sewerage system could not cope. Any further development could adversely affect nearby houses.
- Very careful consideration must be given to any nearby water sources / wells / bore holes.
- Concerns of damaging outflow draining via the boundary stream into Ogston reservoir.
- Concerns if a generator for power would be used as this would create noise & air pollution.

#### Council’s Response

The Environment Agency commented on utility services in response to Q12 and stated that “the site appears to be situated near to an existing combined sewer and foul drainage should be connected to this if feasible. If this is not the case the foul drainage will need to be connected to a Package Treatment Plant (PTP).” The Council considers that this matter could be appropriately addressed by planning conditions as part of any planning consent.

Issues raised on
- ‘Concerns over potential pollution of the stream’ are matters dealt with under Q29/ Biodiversity
Issue: Access onto the local highway network

Summary of Issues Raised

Representation of Derbyshire Count Council (statutory consultee):

An initial site inspection revealed that the site was approached in both directions via narrow and relatively steep lanes. A tractor and trailer was observed travelling past the site and it was therefore considered that the site would be accessible to towing caravans, however it could not be determined that adequate visibility was achievable in either direction.

A speed survey was commissioned by the District Council and the site measured to determine whether a satisfactory level of visibility was achievable. Given the approaches to the site, the measured speeds were predictably low, and as a result the required visibility splays were shortened to comply with the national criteria (2.4m x 47m & 2.4m x 38m). Consequently, it was established that the site could meet the visibility criteria in both directions, and could be reasonably expected to be accessible to, and cater for, a limited number of traveller vehicles.

Summary of Representations:

Local road network:
- Local road network is unsuitable for mobile homes. Surrounding roads are narrow country lanes and heavily used by regular farm vehicles, horse riders and holiday caravans and a lot of traffic comes down from Beresford Lane at speed. Additional traffic could cause potential highway safety issues and could lead to many accidents because roads and width not designed for even small increases. Additional traffic is also likely to increase noise and pollution.
- Temperance Hill is a narrow and winding lane with junctions at each end which have reduced visibility. There are blind spots, and additional traffic with caravans would make it dangerous for pedestrians, especially in winter as pavements and street lighting are in short supply.
- There will also be an increased safety risk due to more parked vehicles along Temperance Hill. Residents of adjacent cottages have to park on the roadside which restricts access to land for larger vehicles.
- This site is extremely close to a local primary school where safety is already a concern with traffic. Further traffic from travellers would increase the risk for school children.

Access to Temperance Hill:
- Poor and dangerous access to the local highway network with caravans and large vehicles due to the uphill blind bend approaching this area. It would be very difficult to achieve the necessary visibility splays because of poor views of traffic travelling at speed from Woolley Moor. Also, the proposed site is not large enough to allow the easy access for emergency vehicles.
- The site would be opposite a busy farm entrance, tractors, trailers and milk tankers would be regularly up and down Temperance Hill.
- A planted hedgerow along the road would block the visibility splay and make access dangerous, yet it is needed to mitigate effects on landscape. These do not appear to be possible together, thus making the site unsuitable for development.

Speed survey:
The County Council’s highways speed survey is not entirely correct and not robust enough, due to the time of day it was undertaken and the length of the three hour survey. It needs testing to see if visibility splays can be achieved in order to protect highway safety.

No suitable or safe access can be made to the transport network from the site. Highway comments inconclusive. Score of Q11 of site assessment should be red.

Council’s Response

The County Council’s Highways Team made initially comments on site GT/09 in September 2018 saying that the development of the site would not cause an adverse impact on the surrounding highway network (Q12 of the Traveller LAA site assessment).

However, the Highways Team noted that it would be unclear if a satisfactory access can be achieved. “The site is situated between 2 bends both of which also form the brow of a hill. It is not clear if adequate visibility is achievable.”

Therefore, the District Council commissioned a speed survey along Temperance Hill to identify the required visibility splays. The Highway Authority has confirmed that the site can achieve the required visibility splays and hence a satisfactory access is achievable.

Issues raised on
- ‘Lack of amenities in the area’ are matters dealt with under Q28/ Access to services & facilities
- ‘Site size too small for proposal’ under Q28/ Site size
- ‘Site size too small for intended capacity & fire safety standards’ to be dealt with in Q28, Site size
- ‘Noise pollution of additional traffic’ to be dealt with in Q29/ Noise pollution

Issue: Adjoining uses & privacy

Summary of Issues Raised
- The proposal would have a negative impact on the privacy of neighbours as the site is next to a row of houses along Temperance Hill. Neighbouring residents would be impacted by loss of views and they do not wish to overlook a potentially “built up area”.
- There is a planning obligation to provide visual and auditory concealment of such sites and this will not be possible due to the intimate shared boundary, the site's proximity to the main road, and the site being overlooked on two sides from above.
- The adjacent rural housing would overlook the proposed traveller site. Also, passers-by could overlook the site so travellers would lack privacy.
- Adjoining uses are residential and farming. Proposal could cause hazard to farming stock.
- The Woolley Moor Trail, a historical and nature trail, runs across the site, and is used by lots of local residents including school children as well as dog walkers and ramblers. Score of Q20 of the site assessment should therefore be red.
- Well Lane footpath, the old well and an old packhorse trail are of historical importance. Well Lane footpath is part of the Woolley Moor Trail and a vital path linking Temperance Hill to the village. The area links also into larger walking routes used regularly by local walking groups.
The site is the only green space and valuable play area for children of Temperance Hill; it has also been used by the local Primary School and is threatened to be lost. Taking this away would seriously impact the lives of the residents.

Concerns about Q16/ Compatibility of the site assessment. The presence of this footpath, paired with the house on the south side overlooking the site, plus the site being visible from Ogston reservoir, arguably contradicts the LAA site assessment point 16 that states the site will provide a fair amount of privacy.

The proposed hedgerows would take years to reach the height required to block visibility and would affect the amount of light to both the site and the neighbouring property.

Council’s Response
Site GT/09 is situated to the north of a row of houses along Temperance Hill; however, the site adjoins only one of the neighbouring houses immediately. The other houses are further away from the site and cannot overlook the site.

Woolley Moor Trail appears to utilise a footpath across the site, the Council will provide an update on the status of this means of access at the hearing sessions.

Q16 of the Traveller LAA site assessment (Appendix 5 of ED44d) states that there are fields to the north and east, residential to the south and woodland to the west. The site would give a fair amount of privacy (hedgerow along road could be planted), does not adjoin communal land and could provide private access.

With regards to the loss of this grassed area, it is considered that children of Woolley Moor are able to use the existing equipped children’s play area and the adjoining playing pitch off Badger Lane. This is the main road through the village. Stretton Handley C o E Primary School provides also grassed and tarmacked outdoor play areas.

Issues raised on
- ‘Mitigation measures reduce site size’ are matters dealt with under Q28/ Site size,
- ‘Screening of site’ under Q29/ local environment
- ‘Light & noise pollution of surrounding area’ under Q29/ Pollution
- ‘Concerns about business use on site’ under Q28/ Access to services & facilities

Issue: Air & water quality, noise pollution, land stability & flood risk

Summary of Issues Raised
- There are concerns over potential run off and waste from the proposed site which could go into the nearby stream. The stream itself feeds into Ogston Reservoir which could pollute drinking water.
- Whenever the water level is low of Ogston Reservoir there is already a line of litter and detritus along the water’s edge. There are concerns that the proposal would exacerbate the problem even further.
- This stream could also flood following heavy rain.
- The land is very susceptible to surface water flooding and parts of the land are boggy. Confirmed by muddy nature of Woolley Moor Trail. Score of Q3 of the site assessment should be amber/red.
- More large vehicles would bring a worsening in air pollution locally and could possible increase noise pollution. The proposal would also cause light pollution to the area.
- Previous dwellings on site demolished in part due to concerns about contamination, reference to relevant water authority required.
- The site has possible land stability issues.

**Council’s Response**

The issue of potential pollution of the stream and Ogston Reservoir is addressed under Q29/ Biodiversity.

Q3 of the Traveller LAA site assessment (Appendix 5 of ED44d) states that there “is no flood risk on site but there is a high/medium risk of surface water flooding further to the west.” This is the larger area to the west which is woodland and outside of site GT/09.

GT/09 is a small family-sized site for three pitches. Potential air, noise and light pollution to the area is considered to be low.

The entire site is within a development low risk area according to the Coal Authority. Further investigation is underway in relation to the potential for contamination in response to issues raised in representations. An update will be provided at the hearing session.

**Issues raised on**

- ‘Impacts on the tourist industry’ are matters dealt with under Q29/local environment

**Question 30.**

*Is the proposed allocation deliverable within the plan period and has it been confirmed by the landowner as being available for the use proposed?*

1 comment received – 0 support – 1 object

**Issue: Consultation**

Summary of Issues Raised

- There has not been enough time for people to give their opinions.
- Time frame too short.

**Council's Response**

The issue of consultation has been already addressed under Q28/ Location & general issues.

**Question 31.**

*Are any additional measures or safeguards necessary to achieve an acceptable form of development?*

1 comment received – 0 support – 1 object

**Issue: Consultation**

Summary of Issues Raised

Has full consideration been given to the ecological impact on the site?

**Council's Response**

The issue of ecological impact on the site has been already addressed under Q29/ Biodiversity.
Issue – Whether or not the approach to assessing other proposals for gypsy, traveller and travelling showpeople’s accommodation would be soundly based and five year supply

**Question 32.**

*Does Policy LC8 set out appropriate and clear criteria for the assessment of planning applications for other gypsy, traveller and travelling showpeople’s sites that may come forward during the plan period? In particular:*

1 comment received – 0 support – 1 object

**Issue: Support**

**Summary of Issues Raised**

- Has full consideration been given to the ecological impact on the site?

**Representation of Derbyshire Count Council** (statutory consultee):

- Support policy subject to amendment to the wording to give firmer commitment to ensure that sites are brought forward for Travellers to meet the identified need (as set out in comments on the NED Local Plan Publication Draft).

**Council’s Response**

The County Council submitted representations on the Publication Draft in April 2018 including comments on Policy LC8: Provision for Traveller Sites. The District Council has already agreed in its Responses to Specific Suggestions for Changes to the Plan (ED6c) that there should be a stronger commitment to bring suitable sites forward for travellers because this is vital to meet identified need within North East Derbyshire and therefore suggested to re-draft paragraph 1 of Policy LC8: Provision for Traveller Sites:

“1. Sites to meet the accommodation needs of gypsies, travellers, or travelling showpeople as assessed through the current Gypsy and Traveller Accommodation Assessment (or its replacement) will be encouraged. The Council will seek to ensure the provision of sufficient pitches within the District to meet the accommodation needs of gypsies and travellers as assessed through the current Gypsy and Traveller Accommodation Assessment (or its replacement).”

**Question 33.**

*Will a five year supply of specific deliverable sites for gypsies and travellers be provided on adoption of the plan together with a supply of specific, developable sites for years 6 to 10? How would any shortfall be addressed?*

1 comment received – 1 support – 0 object

**Issue: Co-existence between Travellers and the local community**

**Summary of Issues Raised**

- Has full consideration been given to the ecological impact on the site?

**Representation of Sheffield City Council** (statutory consultee):

The proposals represent a clear approach to delivering sites to meet both the backlog identified from 2014 - 19 and further sites to meet the initial 5-year period post plan.
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<th>Issue – Whether or not the approach to assessing other proposals for gypsy, traveller and travelling showpeople’s accommodation would be soundly based and five year supply</th>
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<td>The proposals do not provide a supply of sites for years 6 to 10, however we note that there is a development management policy that could be used to deal with any additional sites coming forward during that time, and furthermore depending on progress delivering the four sites identified this may be an issue that could be reconsidered through the first Plan review. We do not consider that this under-supply of 3 pitches over the plan period represents a likely direct risk to increasing Sheffield's assessed needs.</td>
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<th>Council's Response</th>
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