



BIDWELLS

**MATTER 10 POLICIES
FOR TRAVELLERS/
CARAVAN DWELLERS
AND TRAVELLING
SHOWPEOPLE**

**REPRESENTATION
NUMBER 59504**

**BARRATT EASTERN
COUNTIES AND THE
NORTH WEST
CAMBRIDGE
CONSORTIUM OF
LANDOWNERS (17788)**

Matter 10 Policies for Travellers / Caravan Dwellers and Travelling Showpeople

10.1 Assessment of Need

No comments are made.

10.2 Meeting Needs

a)i) Current Supply

No comments are made.

a)ii) New Provision

Is there any evidence to demonstrate (e.g. past performance) that there is a reasonable prospect that the needs of caravan dwellers will be met by windfall sites coming forward in accordance with policies restricting development in the rural areas and the criteria-based policies in the Plans?

What should be the role of the strategic sites in helping to meet needs of caravan dwellers. Is there a reasonable prospect that these sites will deliver new pitches?

Context

It is noted that South Cambridgeshire has concluded at paragraph 40 of their Further Proposed Modifications to the South Cambridgeshire Local Plan that “identifying a supply of further Gypsy and Traveller sites is not required and does not warrant additional land allocations in the Local Plan”.

Two conclusions stem from this statement:

- windfall sites are coming forward to meet year on year needs for the Gypsy and Traveller community and
- there is no need to make specific allocations of sites for the Gypsy and Traveller community

The Local Plan process is reliant on a sound evidence base. On the assumption that the Inspector accepts that the GTANA is that evidence base, then for the Local Plan to still seek to make provision for Gypsy and Traveller pitches “if need is identified” (Policy H/20) and “whether there is a current need” (paragraph 7.69a) is not consistent with the evidence base and provides uncertainty for developers. There is no logic in the Local Plan concluding there is no need and at the same time seeking to allocate areas for provision.

Strategic Sites

Regarding the role of the strategic sites in meeting the needs of Gypsies and Travellers, of note are three matters:

1. South Cambridgeshire's proposed strategy for the location of Gypsy & Traveller sites as part of major developments;
2. the deliverability of Gypsy & Traveller sites as part of major developments and

3. site specific matters relating to land between Huntingdon Road, Histon Road and the A14 Cambridge - Adopted Policy SP/2, Submission Policy SS/2

Gypsy and Traveller Site Location

There is a fundamental concern that significant focus is being given to delivering Gypsy & Traveller sites linked to the major developed sites, essentially those surrounding Cambridge City and new settlements. There are no examples advocated by the Traveller community, Local Authorities or Central Government of where this approach has been adopted as good practice and subsequently delivered successfully on the ground. The question must, therefore, arise as to whether or not South Cambridgeshire is an appropriate area to trial such a fundamentally new approach when the Authority continues to fail to have a five-year housing land supply and is within a growth area with significant pressure to deliver housing.

The approach being advocated prescribes to the Gypsy & Traveller community where they should locate rather than allocating sites and areas of the district which have historically accommodated Gypsy & Travellers and areas where Gypsies and Travellers express a desire to settle. There is no evidence in the public domain that the Gypsy & Traveller community has expressed a desire to purchase land or rent a pitch on any of the major development sites around Cambridge. No historic evidence exists of Gypsies & Travellers reverting to the edge of Cambridge major developed sites as general areas for settling. The exception to this is Chesterton Fen, North East Cambridge, a location which has clearly absorbed the demand for such sites over many years and is now an established traveller community.

The edge of Cambridge sites have been firmly in the public domain since the late 1990s in terms of the Cambridgeshire & Peterborough Structure Plan proposals and, more specifically, in 2002 when the Examination in Public was held and the sites subsequently identified as areas for growth and more latterly through South Cambridgeshire's Local Development Framework, the Core Strategy being adopted in 2007.

Work in relation to these major developed sites has therefore been undertaken over a considerable number of years and at no time until 2009, when SCDC sought to progress a Traveller DPD document which would allocate sites, was it apparent in any way that South Cambridgeshire would seek to incorporate Gypsy & Traveller site provision. It was only during the May 2009 hearings held by the Inspectors in relation to South Cambridgeshire's Site Allocations DPD that it was clear that South Cambridgeshire would be pursuing this issue.

All the major developed sites have an identified capacity in terms of housing numbers. Given the advanced nature of the masterplanning work on these sites, planning permissions already issued and the agreed mixes of uses for the sites to support the residential element, to now accommodate Gypsy & Traveller sites will require land budgets and masterplans to be reviewed and approached differently. This fundamentally undermines the principles upon which landowners and site promoters have entered into the planning process. Gypsy & Traveller pitches together with the appropriate level of open space, boundary treatments and landscaping represent a significant issue in terms of land•take which will affect the capacity and viability of the sites.

The way in which South Cambridgeshire sees Gypsy & Traveller sites coming forward as part of major developments sees those sites either being on the edge of the major developed area or beyond it in the open countryside. These are the principles of siting Gypsy & Traveller sites within the rural area and therefore in terms of community cohesion and seeking to streamline Gypsy & Traveller site provision, these issues are not addressed. Instead, the historic approach of Local Authorities accommodating Gypsy & Travellers on settlement edges will continue. On this basis, there is little merit in seeing major developed sites as any different from other areas of development throughout the district.

Any Authority seeking to mainstream the delivery of sites for Gypsies & Travellers within new communities will need to ensure that such provision is fully integrated into surrounding developments. If it is deemed appropriate that major developed sites should contribute towards such provision, then it is important to establish what size of development would be appropriate to contribute.

Going further and considering social cohesion and the mainstreaming of services, to integrate a number of pitches within a new community of a significant size such as Northstowe, a new settlement of 10,000 dwellings, is far easier to achieve in such a way as to meet the objectives of all sectors of the community than trying to provide pitches within a far smaller development of around 1,000 houses where, by the very nature of such a development, space and scope do not exist to provide a truly workable masterplanning solution which will not impact on viability and deliverability.

However, Northstowe now benefits from an outline planning permission with no such provision and the emerging new settlements of Waterbeach, Bourn Airfield and the Cambourne extension equally do not address the issue of gypsy and traveller provision. The Major Developed sites around the Cambridge Fringe which are being built out equally have no gypsy and traveller provision.

To therefore seek to continue to include provision for gypsy and traveller sites within Policy H/20 and the supporting text is no longer relevant and would result in an unsound approach not based on evidence or best practice locally or nationally.

The policy position being advanced in the Submission Local Plan is not therefore being realised with both none of the new settlements and major developed sites having to provide for Gypsy and Traveller pitches.

Deliverability

The Local Plan does not identify or allude to the way in which pitches will be provided through policy H/20. Any allocation must be deliverable, and in the circumstances of Policy H/20, the Authority is reliant on the good will of private landowners, on the planning application and appeal processes.

With the primacy of the need to deliver conventional housing, given that a five year housing land supply does not exist, it is reasonable to assume that Gypsy and Traveller pitches will not be realised. If the Authority is thinking of seeking such pitches adjoining but outside of particular allocations, then seldom does the promoter or landowner control any additional land beyond the allocation, making this an undeliverable option. In the alternative, if the Authority is seeking sites to be integrated into masterplans then this will create theoretical sites which Gypsy and Traveller groups will not want to occupy and a perception for those occupiers adjoining such sites that those sites will be devalued and incapable of beneficial use. Taking things further such sites will delay and could indeed stop completely sites coming forward for development.

Darwin Green Two / Three – Adopted Policy SP/2, Submission Policy SS/2

The allocation of Darwin Green Two for development has been secured through the Site Allocations Development Plan Document. Extensive debate took place through the Examination process not taking into account any land for Gypsy & Traveller provision. The Inspectors in their decision letter took the view that "the Gypsy & Traveller DPD is the opportunity for a wider consideration of locations such provision, in consultation with the appropriate communities". Accordingly, no decision has been taken to date that the site is appropriate to accommodate such provision. The question again arises in terms of what consultation South Cambridgeshire has specifically undertaken with the Gypsy & Traveller community regarding the appropriateness of this site given the absence of any responses in the public domain. The commentary provided by South Cambridgeshire provides no certainty whatsoever in terms of how the site will be developed, leaving this for the masterplanning and planning application stage.

For Darwin Green, there is a masterplan which has progressed to an advanced stage with the full support of officers. A copy of the masterplan is attached at Appendix One and the Inspector will note that there is no provision for Gypsy and Traveller sites. This is entirely consistent with the Inspectors' decision letter following the Site Allocations Development Plan Document examination. The masterplan does not lend itself to incorporating such pitches, being heavily constrained by Green Belt and with vehicle access restricted to two points.

In a plan-led system it is crucial that Local Plans provide clarity and confidence to developers and landowners regarding how sites will come forward for development. The ambiguous nature of the proposed policy places doubt in the minds of developers and landowners as to how the site would, in practice, be developed if all parties accepted at an undetermined point in the future that a need for Gypsy and Traveller site provision existed. Proposed paragraph 7.69a references that sites could potentially be required and secured not only through initial planning permissions for a site but also through "reserved matters approval" which when the original outline will include a masterplan and fixed parameter plans is not a workable scenario.

Allocating sites for Gypsy & Traveller provision does not secure delivery. The wishes of the landowner and ultimate developer must be taken into consideration at this stage given the need to demonstrate that sites allocated are deliverable. Delivery depends in part on there being an identified need for any particular use and such need has not been identified in terms of the specific site in question. South Cambridgeshire has provided no clarity or a draft strategy for ensuring delivery. Reference is made to sites being able to be privately owned or delivered by an affordable housing provider. Again, there is no evidence that local affordable housing providers are in agreement to deliver Traveller sites. Whilst there are examples of affordable housing providers delivering Travellers sites this is a specialist area of work which will require affordable housing providers to be appropriately experienced and resourced.

At this stage, given the position of the landowners and the promotion agreement which has been entered into with Barratt Eastern Counties, there is no willingness to incorporate Gypsy & Traveller accommodation within the masterplan for North West Cambridge and subsequent applications. Any use can only be incorporated within a development if it will not harm the overall viability of the scheme, that there is a demonstrable need for the use and that future residents will not suffer any reduced amenity from that use operating. Barratt Strategic have entered into a promotion agreement on behalf of the North West Cambridge Consortium of Landowners based on certain assumptions regarding land value, the nature of development to be consented, the quantum of residential development permitted and the nature of the associated uses. Bringing other matters to the table so late in the day fundamentally affects viability and brings uncertainty into an already difficult and lengthy planning process. To introduce issues which will significantly delay the grant of planning permission and ultimate delivery of the site cannot be supported at this time.

The local Gypsy & Traveller population lives in market housing, on private caravan sites comprising mainly family groups and local authority provided sites. This mix of provision has been provided now for some time and in general terms, whilst there has been and will continue to be, some localised disquiet in relation to specific sites, overall there is little overt friction between the Gypsy and settled community as both communities prefer to be near but distinct from each other. This concept of near but separate, advocated by several local authorities, is considered the key to successful community cohesion, particularly when considering the different ethnic background and cultures of the Gypsy & Traveller community. The key for the Gypsy & Traveller community is the need to be close to family members and sources of employment, generally in areas which they are familiar with.

To force Gypsies & Travellers to relocate outside of such areas is morally, socially and ethically wrong and counter to the conclusions of earlier Cambridgeshire Gypsy & Traveller research presented to the previous Local Development Framework Examination. Sites should be provided where Gypsies & Travellers want to live. Given this, it cannot be seen in any way whatsoever appropriate, practical or

deliverable to seek sites within major developed areas which the Council will then have to persuade gypsies and travellers to occupy, at odds with where they desire to locate.

Conscious of the length of time which the Local Plan and the previous Local Development Framework process have taken to date, continuing with the ethos first considered in 2009, Policy H/20 appears as a legacy position which has not been updated to reflect the findings of the GTANA.

b)

No comments are made

10.3 Other Matters

a)

No comments are made

b)

If I were to conclude that the Plans do not meet Legislative requirements and/or are not consistent with National Policy what would be an appropriate and proportionate way forward?

The Inspector is asked to delete Policy H/20 and the supporting text at paragraphs 7.66 to 7.69 inclusive.

Alternatively, if the Inspector considers that seeking to deliver Gypsy and Traveller sites as part of the emerging, standalone new settlements is appropriate as part of delivering balanced communities, then Policy H/20 and the supporting text could be amended to reflect references to “new settlements” rather than “large scale new communities and significant major developed sites”. Taking matters a step further, so as to provide absolute clarity, the policy could name those new settlements which are expected to deliver traveller pitches and the policies for those settlements amended accordingly.

APPENDIX 1

DARWIN GREEN 2/3 MASTERPLAN



KEY SPACES

- 01. Primary Parkland
- 02. Informal activity areas
- 03. Wildflower meadows and habitat corridors
- 04. Woodland glades along bund ridge
- 05. Woodland
- 06. Elevated viewpoints
- 07. Balancing ponds
- 08. Green corridor links with DG1
- 09. Country Park/Sports Pavilion parking and drop off
- 10. Connection across the A14 and Potential link to the Orbital Cycle Route
- 11. Balancing pond/ecological habitats
- 12. Awarded Drainage ditches - retained
- 13. Sports pavillion and square
- 14. Amphitheatre
- 15. Submersible landscape
- 16. Pumping Station

PUBLIC OPEN SPACE FACILITIES

- Sports dimensions taken from Sport England
- 16. 1no. Cricket Pitch - Senior: 6 wickets
111.56 x 106.69m
 - 17. 1no. Rugby Pitch - Senior inc. run off
154 x 80m
 - 18. 1no. Football Pitch = U15-U16 (FA sizes) inc. run off
106.6 x 70m
 - 19. 1no. Hockey Pitch - inc. run off
63 x 50.7m
 - 20. 2no. Tennis Court - Lawn Tennis Courts inc run off
36.57 x 18.29m
 - 21. 1no. BMX Track
2400m²
 - 22. 15no. LAP's
 - 23. 2no. LEAP's
 - 24. 1no. NEAP's
 - 25. Allotments
 - 26. Community Orchard
 - 27. Enhanced landscape - earth mounding etc SCDC to confirm details.

VIEWS

- - - - -> Potential views
- - - - -> Retained Girton Gap

LANDSCAPE VISION

Darwin Green Two promotes a significant quantity of high quality public open space and contains a mosaic of connected landscape habitats. Landscape elements include water courses, woodlands, wildflower meadows and green corridors. These landscape elements are connected to Darwin Green One and the wider Cambridge landscape through a variety of green corridors, pedestrian and cycle links.

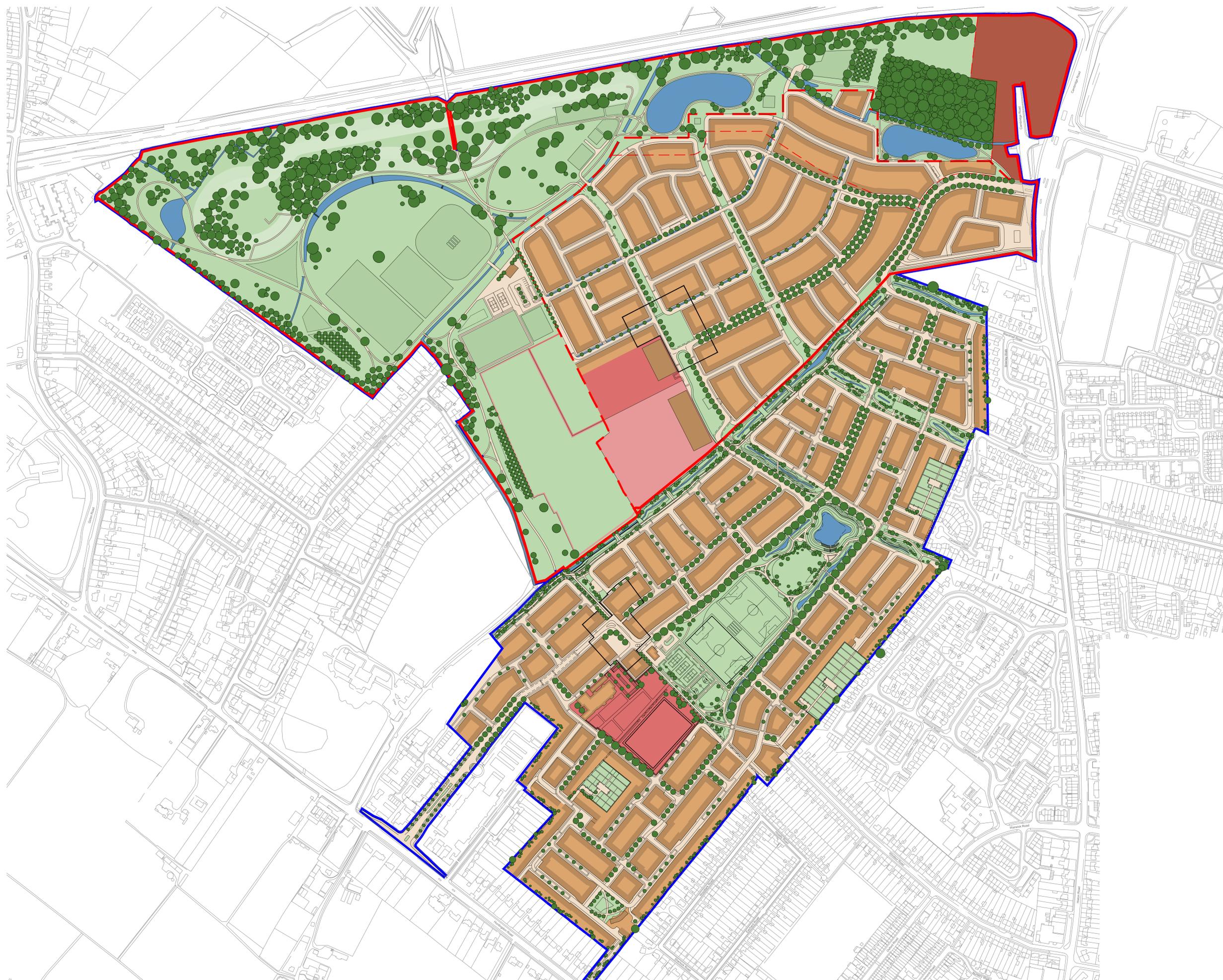
The integral network of space complements the built form promoting a sense of place and legibility to develop whilst encouraging safe permeable movement.

Within the landscape a variety of sports pitches, play facilities and allotments are further complimented by a generous Country Park for informal recreation.

Existing water courses provide enhancement opportunities to promote new ecological habitats and improved biodiversity whilst a potential bund screening the A14 encourages opportunities for new viewpoints of the immediate and broader landscape.

NOTES

- Public Open Space (POS) facilities are based on emerging SCDC Local Plan: POLICY SC/8 OPEN SPACE STANDARDS
- POS facilities illustrated are based on SCDC preliminary requirements.
- POS calculations based on MRA Accommodation Schedule dated 12.12.12 & occupancy recommendations within SCDC Open Space and SPD January 2009 section 2.2
- The A14 Compulsory Purchase Order (CPO) boundary is illustrated as a dashed line for information.
- The Landscape Bund is illustrated to accommodate approximate topsoil quantities generated from both DG1 and 2.
- Award drains retained in current locations as requested by SCDC.
- Indicative location illustrated to identify a potential Orbital Cycle Route connection between the A14 link and DG1.
- Balancing pond areas based upon Woods Hardwick preliminary calculations (Drainage Strategy 16877/B4) issued on 15.08.13.
- Gantry locations are indicative and based upon preliminary dwg issued by SCDC.



Notes
Do not scale from this drawing - use figured dimensions only.
All dimensions are in millimetres unless otherwise stated.

Legend	
	Darwin Green 2 - Planning Application Boundary
	Darwin Green 2 - Land Ownership Boundary
	Darwin Green 2/3 - Allocation Boundary
	Darwin Green 2 - Allocation Boundary
	Indicative building footprints

Key:	
	Streets / Squares / Cyclepaths / Footpaths
	Flexible mixed use zone
	Residential development
	Primary School
	Secondary School
	School playing fields
	Public open space
	Formal play areas
	Sports / community building
	Proposed tree planting
	Urban swales
	Commercial
	Darwin Green One

Revision	By	Date

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Client **Barratt Homes Eastern Counties**
 and the North West Cambridge
 Consortium of Land Owners

Project **Darwin Green 2 / 3**
 Huntingdon Road Cambridge

Drawn Title **Illustrative Master Plan**
 Darwin Green 1, 2 & 3 Composite

Status	Preliminary	Scale @ A1	1:3000	Date	Oct 2013
Drawn No.	11 896 - SK 28.1			Rev	

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Legend	
	Darwin Green 2 - Planning Application Boundary
	Darwin Green - Land Ownership Boundary
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	Darwin Green 2 - Allocation Boundary
	Indicative building heritage

Key:

	Streets / Squares / Cyclepaths / Footpaths
	Flexible mixed use zone
	Residential development
	Primary School
	Secondary School
	School playing fields
	Public open space
	Formal play areas
	Sports / community building
	Proposed tree planting
	Urban swales
	Commercial
	Darwin Green One

Revision	By	Date

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Client: **Barratt Homes Eastern Counties and the North West Cambridge Consortium of Land Owners**

Project: **Darwin Green 2 / 3 Huntingdon Road Cambridge**

Drawn Title: **Illustrative Master Plan**

Status: Preliminary Scale @ A1 1:2500 Date: Oct 2013

Drawn No. 11 896 - SK 28	Rev B
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