



Brentwood
Borough Council



Brentwood Borough Local Development Framework

Gypsies and Travellers Development Plan Document

PRE-SUBMISSION DRAFT PLAN

December 2009



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**BRENTWOOD BOROUGH LOCAL DEVELOPMENT
FRAMEWORK**

**GYPSIES AND TRAVELLERS
DEVELOPMENT PLAN DOCUMENT**

**PRE-SUBMISSION
DRAFT PLAN**

December 2009

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List of Abbreviations and Glossary of Terms (Note terms in *italics* are explained elsewhere in the glossary)

BRLP	Brentwood Replacement Local Plan: The Local Development Plan for the Borough, adopted in August 2005, and will eventually be superseded by the <i>Local Development Framework</i> . The determination of development proposals must be made in accordance with the Development Plan unless material considerations indicate otherwise.
DPD	Development Plan Document: those documents that, together with the <i>Regional Spatial Strategy</i> , form the Development Plan for the area, and are subject to independent examination (including a Core Strategy, Site Specific Allocations, Action Area Plans, and Generic Development Control Policies). The programme for preparing Development Plan Documents is set out in an authority's <i>Local Development Scheme</i> and can be reviewed in whole or in part, independently from one another.
EERA	East of England Regional Assembly: exists to promote the economic, social and environmental well-being of the region. It consists of a partnership of elected representatives from the 54 local authorities in the East of England and appointed representatives from social, economic and environmental interests (Community Stakeholders). It forms the regional planning body responsible for preparing the <i>Regional Spatial Strategy</i> .
LDF	Local Development Framework: the name for the set of Local Development Documents, consisting of <i>Development Plan Documents</i> , Supplementary Planning Documents, a Statement of Community Involvement, the <i>Local Development Scheme</i> and Annual Monitoring Reports, which together will provide the framework for delivering the spatial strategy for the Borough.
LDS	Local Development Scheme: the programme for preparing Local Development Documents. All authorities were required to submit a Scheme to the Secretary of State for approval within six months of commencement of the Planning and Compulsory Purchase Act 2004.
PPG	Planning Policy Guidance: set out the Government's national guidance on different aspects of planning. They are gradually being replaced by Planning Policy Statements.
RSS	Regional Spatial Strategy: part of the Development Plan setting out the region's policies in relation to development and use of land.
SA	Sustainability Appraisal: a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, environmental and economic factors) and required to be undertaken for all Local Development Documents.

1. Summary

Background

- 1.1 As part of the new Local Development Framework (LDF), which will eventually replace the Brentwood Replacement Local Plan (BRLP), the Council is required by the government to prepare a Development Plan Document (DPD) dealing with Gypsy and Traveller accommodation needs in the Borough.
- 1.2 As a first stage in this process, the Council published an Issues and Options document in July 2007 for a six-week public consultation. That document set out the background and context for consideration of what the Council believed to be the issues and options, provided links to other more detailed sources of information, and asked a number of specific questions in order to encourage comments to be made.
- 1.3 As a result of that consultation a number of sites were suggested to the Council as potential permanent residential Gypsy and Traveller sites, particularly by the Brentwood Gypsy Support Group. The Council published those suggested sites as a second stage Issues and Options consultation in June 2008.
- 1.4 These earlier consultations together with the other relevant background information, including progress on the review of the regional policy dealing with the same issue across the East of England Region, have been instrumental in progressing to this next stage of the DPD production, the Pre-Submission Draft Plan, which sets out the Council's proposals for providing the required number of additional authorised pitches.
- 1.5 The earlier consultation documents can still be viewed on the Council's website (<http://www.brentwood.gov.uk>).

The Level of Need

- 1.6 As referred to above, at the same time as the Council has had to produce this plan, the East of England Regional Assembly (EERA) has been preparing a single issue review of the East of England Plan, the Regional Spatial Strategy (RSS), titled 'Gypsy and Traveller Accommodation in the East of England', which has proposed the level of additional authorised permanent pitches to be provided in each local authority across the region.
- 1.7 This was submitted to the Secretary of State for approval and subject to an examination by an independent panel of inspectors in October 2008. The report of the panel was published in December 2008 and recommended that, as set out in EERA's draft policy, Brentwood provides a minimum of 15 additional pitches for immediate needs up to 2011, with on-going need assessed on the basis of an average 3% compound increase per year (an additional 9 pitches to 2021). The Secretary of State subsequently approved the policy in July 2009, which continues to require Brentwood to provide at least 15 additional pitches up to 2011.

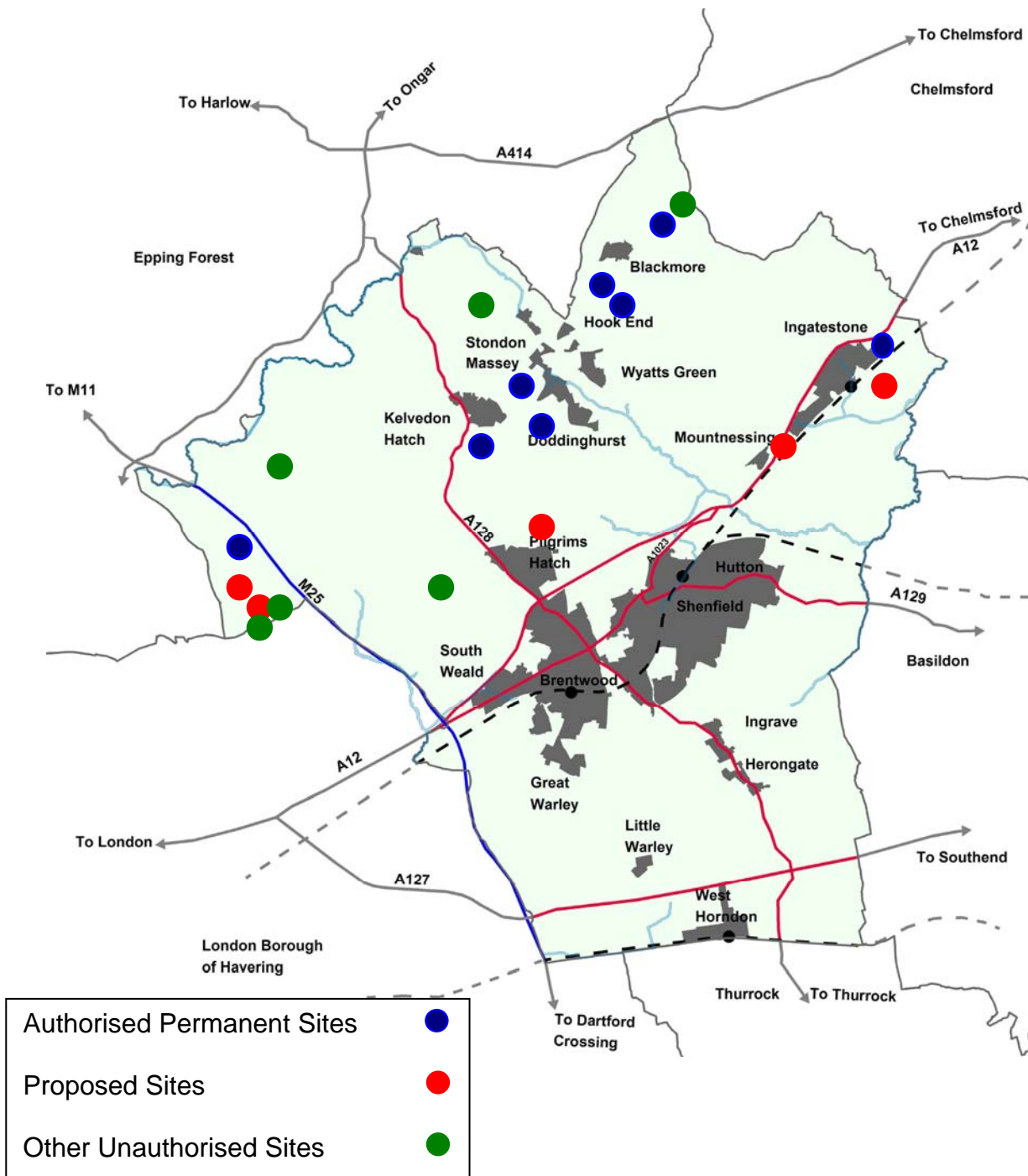
The Draft Plan Proposals

- 1.8 In March 2009, the Council resolved that it is in the best interest of the Borough to accept that 15 additional authorised permanent residential pitches be provided by 2011 (Policy Board 11 March 2009 Min 610). It was further agreed that it would be preferable to consider meeting that requirement from the existing sites with temporary permission or existing unauthorised sites.
- 1.9 The Council has, therefore, identified the following preferred sites to meet the 15 pitch requirement to 2011:
- Willow Farm, Stock Lane, Ingatestone (5 pitches)
 - Roman Triangle, Roman Road, Mountnessing (5 pitches)
 - Hope Farm, Horsemanside/Goatswood Lane, Navestock (1 pitch)
 - Treetops, Curtis Mill Lane (3 pitches)
 - Cottage Garden, Beads Hall Lane, Pilgrims Hatch (1 pitch)
- 1.10 Plan 1 shows the location of existing authorised residential Gypsy and Traveller sites in the borough, the location of the 5 proposed additional authorised sites and the location of other unauthorised sites (with and without temporary planning permission).
- 1.11 The Council wants to achieve the widest possible consultation on these proposed sites in order to encourage views on their appropriateness in meeting the 15 pitch requirement. In making your representations on the proposals please provide an explanation of your views for or against any proposed site. Additionally, if you consider that any of these sites are not appropriate you should put forward what you consider to be a more appropriate site or sites. These may be one or more of the discounted sites also set out in the consultation document or an alternative suggestion. The Council is particularly interested if you are able to identify a non-Green Belt site. Any alternative should have regard to the policy criteria set out on page 18 of this document.

How to Make Representations

- 1.12 The Council uses a variety of consultation methods to enable and encourage involvement in the preparation of the DPD, and more information on this can be found on the Council's website.
- 1.13 Representations on the proposed sites set out in this document can be made by:
- Filling in and returning the enclosed 'Representation Form', or other written representations, to the Planning Policy Team, Brentwood Borough Council, Town Hall, Ingrave Road, Brentwood, Essex CM15 8AY; or
 - Printing a copy of the 'Representation Form' from the Council's website (www.brentwood.gov.uk) and returning it by post or by email to planning.policy@brentwood.gov.uk ; or
 - Completing the online 'Representation Form' at www.brentwood.gov.uk; or
 - Faxing a 'Representation Form' or other written representations to 01277 312635

- 1.14 If you have any queries regarding the consultation, please contact the Planning Policy Team on 01277 312609/312610.
- 1.15 The period for representations will run for eight weeks from 16 December 2009. All representations need to be received, therefore, by 5pm on 10 February 2010. Information provided in response to this consultation will be published or disclosed in accordance with the access to information legislation. All representations will be made available for public inspection.



Plan 1. Existing Authorised and Unauthorised Gypsy and Traveller Sites in Brentwood Borough

2. Introduction

Background

- 2.1 The planning process for providing for Gypsy and Traveller sites is set out in government Circular 1/2006 'Planning for Gypsy and Traveller Sites'. Councils now have a duty to allocate sufficient land for Gypsy and Traveller accommodation needs. The overall level of need should be assessed as part of the Regional Spatial Strategy (RSS). The RSS should identify the number of pitches required (but not their location) for each local authority. The numbers of pitches set out in the RSS must then be translated into specific site allocations in one of the local planning authority's DPDs that form part of the LDF.

The Single Issue Review of the East of England Plan (RSS): Planning for Gypsy and Traveller Accommodation in the East of England.

- 2.2 The East of England Regional Assembly (EERA) was required to undertake an immediate single issue review of Policy H3 of the East of England Plan (approved in May 2008), to determine the need for Gypsy and Traveller accommodation across the region and draft a revised policy to allocate a requirement for additional permanent pitches to be provided by each district/borough authority, including Brentwood.
- 2.3 A draft policy was published for consultation in February 2008. Following an examination in public during October 2008, which considered views on the draft policy, and subsequent consideration of the examination panel's report and recommendations, the Secretary of State published 'Proposed Changes' to the draft policy in March 2009. The report of the examination panel and the 'Proposed Changes' made no amendment to the requirement for additional authorised permanent pitches in Brentwood set out in the draft policy, which remained at a minimum of 15 pitches.
- 2.4 The policy was approved by the Secretary of State in July 2009 and has also continued to require the Council to provide at least 15 additional authorised permanent residential pitches for local accommodation needs in the Borough by 2011.

The Gypsies and Travellers Development Plan Document

- 2.5 The Gypsies and Travellers DPD is required to provide for the needs of Gypsies and Travellers within Brentwood Borough in terms of sites and numbers of pitches to meet the approved regional policy. That need is expressed as both an existing need to 2011 (15 additional pitches) and an on-going need beyond 2011 for future pitch requirements as resident Gypsy and Traveller family circumstances change (3% compound increase per year to 2021, which equates to 9 pitches).

- 2.6 The 15 pitch requirement for the period to 2011 is additional to the existing authorised permanent pitches already provided in the Borough at 2006, which totalled 9 pitches, as set out in Table 1. It should be noted that this information amends previous information due to two pitches at Rye Etch, Mill Lane being wrongly referred to as permanent rather than temporary permissions, and there being two rather than one permanent pitch at Poplars Farm.

Table 1: Authorised Gypsy and Traveller Pitches with Permanent Permission in Brentwood at January 2006	
Address	Number of Pitches
Warren Lane, Doddinghurst	1
Ponderosa, Place Farm Lane, Kelvedon Hatch	1
The Willows, Place Farm, Kelvedon Hatch	1
Lilliputs, Chelmsford Road, Blackmore	1
Meadowview, Ingatestone Road, Blackmore	2
Poplars Farm, Ingatestone	2
Wenlock Meadow, Wenlock Lane, Blackmore	1
Total	9

- 2.7 In July 2009, however, a further one pitch site was granted permanent permission on appeal at Clementines Farm, Murthuring Lane. The inspector considered that the need for this particular site had arisen since 2006, and was therefore in addition to the 15 pitch requirement set out in the regional plan. There are therefore, at July 2009, 10 permanent authorised residential pitches in the Borough.

The Consultation Process

- 2.8 In preparing a DPD, the Council is required to notify specific and general consultation bodies, together with residents and businesses within the Borough, and invite comments on the proposals [Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008]. Furthermore, before submitting a DPD to the Secretary of State for approval, the Council must make available the proposed submission document to the same specific and general consultation bodies and invite local residents and businesses to make further representations [Regulation 27]. This document is the Regulation 27 consultation.
- 2.9 The earlier consultation on Issues and Options (Regulation 25) was undertaken with two formal stages, as follows:

(i) Issues and Options Stage 1 Consultation

The Council consulted on a first stage 'Issues and Options' in July 2007. At that stage the Council did not seek views on specific sites, but raised questions

regarding the level of need, and, if sites were required, the choices for site locations and the criteria by which the appropriateness of any sites should be assessed.

The Council had deliberately not set out any specific sites itself at that stage in order not to be seen to prejudge the issue of need and site locations before a wider debate on the issues and options had been undertaken. This was considered by the Council as being in line with the purpose of the new LDF process to engage with the public and other stakeholders at an early stage and before putting forward draft proposals.

(ii) Issues and Options Stage 2 Consultation

As part of the responses to the earlier consultation a number of suggested possible sites for permanent residential Gypsy and Traveller sites were put forward. The Council had made clear in the first Issues and Options document that any suggestions put forward as possible sites for Gypsies and Travellers would be advertised and an opportunity given for wider public consultation and comment on them.

The second stage consultation in May 2008 provided the opportunity for comments to be made on each of the 18 sites/locations suggested to the Council.

Definition of a Pitch

- 2.10 A pitch is a basic unit of accommodation for a Gypsy/Traveller household, providing an area of land for a building, parking space and one or more caravans (in Essex a pitch accommodates an average of 2 caravans, although the RSS review document uses an average of 1.7 caravans per pitch). There is no set size for a pitch, and in practice can vary in extent.

Why Provide Authorised Gypsy and Traveller Sites?

- 2.11 Whilst it is difficult to establish accurately the number of Gypsies and Travellers in Britain, it is estimated that they make up less than 1% of the population. More detailed figures on numbers of caravans and their distribution are set out in the first 'Issues and Options' document. Due to the national and regional figures, the Government has told local authorities that there is a need for additional authorised caravan sites (some 3,500 Gypsy and Traveller caravans are located on unauthorised developments or encampments across England) and many families encamp illegally on land for temporary periods as they travel for business or pleasure, or are moved on by the authorities due to the lack of authorised sites.
- 2.12 If sufficient provision is not made (both permanent and transit sites), unauthorised camping will inevitably continue. The problems associated with unauthorised sites, such as the cost of taking enforcement action, the clearing up of temporary encampments, the tensions between the settled community and Gypsies and Travellers, and the social exclusion experienced by Gypsies and travellers will continue.

- 2.13 The provision of authorised sites should reduce the occurrence of unauthorised sites over time. The debate at a Regional, County and local level has and continues to be where and how should authorised sites be provided.

Frequently Asked Questions

- 2.14 During the earlier consultation stages a number of questions were raised and/or statements made by respondents regarding Gypsies and Travellers based on misinformation or preconceptions.
- 2.15 In providing information and responses to these issues it is intended that a better understanding of the needs of Gypsies and Travellers and the reasons for the Council's proposals may be gained. Some of the more frequently raised issues were:

- (1) **A Gypsy and Traveller Site will devalue the price of properties.** Whilst it is a generally held view that Gypsy and Traveller sites have an impact on property prices, perhaps surprisingly there is so far no published evidence of permanent sites adversely affecting property prices.

There is very little published research apart from an independent study by the Planning Exchange and the Joseph Rowntree Foundation in Scotland, which found no evidence to confirm an impact. People who moved close to small managed sites seem not to know of the site as they tend to blend into the local community and because of this it seems not to affect property prices in the longer term.

However, from a statutory point of view, the impact on property prices is not a material planning consideration and therefore cannot be considered by the Council.

- (2) **There will be an increase in crime and anti-social behaviour.** There are a minority who break the law in both the Gypsy and Traveller community and the settled community. However, evidence, at a national level, indicates that there is no increase in crime in an area where such sites exist.

Again, independent research (in Scotland) has shown that fear of trouble is not borne out once a site is up and running.

- (3) **Gypsies and Travellers don't pay taxes and other service costs.** Gypsies and Travellers living on authorised permanent sites pay council tax, fuel charges, etc. Gypsies and Travellers are also required to pay income and car tax etc.

These are far easier to collect where there is an official serviced address on a permanent site granted planning permission. All Council Tax demands must be served on a proper postal address. Unauthorised sites often do not have individual postal addresses for each caravan. It is often also difficult to identify individuals.

Authorised sites have proper postal addresses so Council Tax notices can be served. If payment is not forthcoming, it is also possible to serve enforcement papers that take further steps to pursue payment.

All caravans are in Band A (i.e. the lowest band) because Council Tax is calculated in accordance with the value of the property involved. A caravan/mobile home is not considered a property in Council Tax terms, but is considered a "chattel" i.e. a possession.

- (4) **The Council should refuse to carry out government policy to provide sites.** If the Council were to decide not to prepare the document the Government could produce it and charge the Council. In such circumstances there could be less local input or influence on the outcomes.

The Council is also concerned that whilst provision is not made planning inspectors are granting temporary and permanent planning permission on appeal. The Leader of the Council has therefore written to the Secretary of State for confirmation that in carrying out this required process, Local Authorities will be able to defend illegal activity more robustly.

- (5) **There are too many Gypsies in the District; there is no need for any more.** The level of local provision for each authority is determined by the Government through a single issue review of the East of England Plan (the RSS). The figures are based on research commissioned by the East of England Regional Assembly (EERA) or, where available, countywide Gypsy and Traveller Accommodation Assessments (GTAA).

This assessment of need has been debated through the examination on the RSS Single Issue Review and approved by the Secretary of State.

Any unjustifiable ban on further Gypsies and Travellers within the Borough would be considered to be discriminatory (Race Relations (Amendment) Act 2000). The Council also has a statutory duty to meet the housing needs of Gypsies and Travellers under the Housing Act 2004.

- (6) **Why are Gypsies and Travellers being given preferential treatment in the Green Belt?** Government policy is that Gypsy and Traveller sites are appropriate in the countryside but are inappropriate in the Green Belt, and should only be permitted if no suitable sites outside the Green Belt are available.

All of Brentwood's rural area, outside the identified settlements, is Green Belt. The Council has not been able to identify sites within the existing urban areas and it has been considered unlikely that any such sites would be available due to land values and amenity issues.

Whilst the Council continues to take action against unauthorised developments in the Green Belt, it has been concluded that further authorised sites can only be provided by making provision within Green Belt locations. Any Green Belt site would need to minimise the harm to Green Belt objectives, such as openness of the countryside, through, for example, careful consideration of its location and/or by limiting the size of sites.

- (7) **Gypsies and Travellers should live in conventional ‘Bricks and Mortar’ housing like everyone else.** There are no accurate figures about Gypsies and Travellers living in housing.

For some Gypsies and Travellers housing can be a satisfactory solution either for a temporary period or more permanently, and, therefore, some have chosen to live in ‘bricks and mortar’ housing. However, others have been forced to accept conventional housing due to the lack of available caravan pitches and would choose to revert to that lifestyle.

The courts have confirmed that homeless Gypsies and Travellers should not be forced to accept conventional housing. In a High court case in 2003, drawing on European case law, the judge stated “In order to meet the requirements and accord respect, something more than taking account of an applicant’s Gypsy culture is required ... Respect includes the positive obligation to act so as to facilitate the Gypsy way of life” (Willers and Johnson 2004: 188).

3. The Determination of the Preferred Sites

Background

- 3.1 In determining which sites to put forward to meet the requirement for 15 additional authorised permanent residential pitches in the recently approved review of Policy H3 in the East of England Plan, the Council has considered a number of relevant factors, including advice on site suitability set out in government Circular 1/2006 “Planning for Gypsy and Traveller Caravan Sites”; the draft criteria-based policy set out at para. 3.16; the accompanying Sustainability Assessment to this plan; and the views expressed in the earlier stages of consultation on this document.

Circular 1/2006

- 3.2 In assessing the appropriateness of a site location, government guidance set out in Circular 1/2006 indicates the following factors as important:
- Site availability;
 - Site suitability;
 - Impact on the character and appearance of the locality;
 - Impact of areas or features designated for their national landscape and/or conservation;
 - Impact on amenity;
 - Suitability of the location; and
 - Impact on the nearest settlement.

Earlier Consultation Responses

- 3.3 Comments on the previous two stages of ‘Issues and Options’ consultation provided a variety of views to inform the Council’s consideration of how to form a policy for considering sites for Gypsies and Travellers and how to meet the 15 pitch requirement. A full report on the various consultation responses will be published to accompany the document submitted to the Secretary of State for approval. However, the following summary of responses to the earlier consultations is material to the consideration of site selection.

(a) Stage 1: Issues and Options

- 3.4 The first stage of public consultation during July to September 2007 received 185 responses, of which, 157 responses were to the comment form. The form asked a number of questions, of which those relevant to consideration of site identification were:

Should possibilities for Gypsy and Traveller sites being located within existing urban areas be considered before rural sites?

50 responses (36.0%) agreed that urban sites should be considered before rural sites with a further 6 responses (4.3%) caveating that as a possibility. Reasons for this view included access to services and infrastructure; use of commercial brown field sites; integration into the settled community.

However, 35 responses (25.2%) disagreed and 3 responses (2.2%) specified rural rather than urban sites. 5 responses (3.6%) felt both urban and rural should be considered.

If the level of pitch provision requires sites outside existing settlement boundaries, how and where should these be located? Should they be based on the existing unauthorised sites or should they be new sites, either removed from the Green Belt or identified as 'exception sites' within the Green Belt?

41 responses (29.7%) were against any more sites being provided, with 10 responses (7.2%) being against the use of existing unauthorised sites, 4 responses (2.9%) against exception sites and 1 response (0.7%) against any new sites.

Of the positive comments, 21 responses (15.2%) were in favour of new sites, whilst 19 responses (13.8%) were in favour of the use of existing unauthorised sites with or without caveats; and 9 responses were in favour of both.

Should the Council seek to provide Gypsy and Traveller sites as part of proposed larger residential developments? If so, how should this be achieved and is there a site threshold that should be adopted?

93 responses (65.0%) did not agree that the Council should seek to provide sites as part of larger residential developments. Not many of the responses expanded on this view, but 4 responses considered local housing/affordable housing needs should take priority.

Of the 25 responses (17.5%) in favour, a few comments were made encouraging discussion with Travellers/the local community.

To what extent is it reasonable and appropriate to rely on Gypsies and Travellers delivering the required level of pitch provision through acquiring their own private sites?

Of the 63 responses (46.3%) that considered this reasonable, the most common caveats were provided the sites had planning permission and/or the residents paid Council Tax (31 responses or 22.8%).

40 responses (29.4%) considered this not reasonable, with reasons including the need for the Council to be in control of site provision and management and the Gypsies and Travellers should not be able to acquire sites when other residents cannot. These comments were also included in the general responses.

Is there an optimum site size in terms of number of pitches (or range of pitch numbers) and if so what is this?

Of those comments expressing a view on a specific site size, the majority, 30 responses (23.3%), suggested a figure between 1 and 5 pitches. Of those comments not expressing a specific size, again the majority, 31 responses (24.0%), suggested “small sites” as preferable.

Of the other comments, there were again a number expressing preference for “small sites”.

3 responses suggested a site size above 15 pitches.

(b) Stage 2: Suggested Sites

3.5 The second stage of public consultation during May to July 2008 received 2305 responses. In addition to responses to the 18 suggested sites, other comments, both general and specific were made, of which those relevant to site suitability were (number of responses in brackets):

- Don't support sites anywhere in the borough [234]
- Don't support sites in the Green Belt (and on Country Parks, Nature Reserves, Open Space, Conservation areas) [113]
- The law/planning legislation should apply equally to everyone/Gypsies and Travellers shouldn't be given sites that others wouldn't [176]
- Against existing unauthorised sites being authorised – would create a precedent [27]
- Sites should be located where they don't impact on others/away from residential properties/businesses [77]
- Use existing temporary or unauthorised sites [11]
- Any sites should be limited in size [14]
- Sites should be controlled, managed and regularly inspected, and residents pay Council Tax etc. [50]
- More appropriate to use brown field sites with access to main roads [24]
- Sites should be spread across the Borough [8]
- Sites should be close to amenities/integrated into existing communities [21]

3.6 The extent of support or otherwise for each site expressed in the response to the comment forms is set out in the following two tables. Whilst this information has informed the Council's decision on sites, it has been considered with necessary caution due to the potential partiality of the views expressed dependent on the address of the respondent in relation to each of the sites (both in terms of 'for' and 'against')

Table 2: Extent of support for each site/location (i.e. 'YES' response)				
Site/Location	Permanent		Transit	
	Number	%age	Number	%age
Site 15: Land by A12/M25	285	12.4	353	15.4
Site 14: Land adj. the existing caravan site, Bentley	258	11.3	278	12.1

Site 9: Old A12 Works Site, Ingatestone	254	11.1	320	14.0
Site 2: Land off Roman Road Mountnessing	247	10.8	177	7.7
Site 12: Land to North of A127/West of A128	241	10.5	260	11.4
Site 16: Land next to CA site, Coxtie Green Road	227	9.9	273	11.9
Site 7: Chep Site, Warley Street	211	9.2	261	11.4
Site 3: Land by Navestock Side (Hope Farm)	182	7.9	176	7.7
Site 1: Land off Stock Lane, Ingatestone	172	7.5	137	6.0
Site 5: Land off Chivers Lane and the Clapgate Estate	166	7.2	176	7.7
Site 4: Land at Curtis Mill Lane	141	6.2	142	6.2
Site 13: Land at Thoby Priory	107	4.7	111	4.8
Site 6: William Hunter Way Car Park	105	4.6	126	5.5
Site 10: Land off Wenlocks Lane	97	4.2	110	4.8
Site 11: Land at Swallows Cross	97	4.2	100	4.4
Site 18: Land at Lower Road, Mountnessing	84	3.7	94	4.1
Site 8: Former Holly Trees School Playing Field, Warley	72	3.1	78	3.4
Site 17: Hutton Country Park	35	1.5	38	1.7

- 3.7 The site which had the highest number of 'YES' responses supporting a permanent residential site was Site 15 'Land adjacent to the A12/M25' (285 or 12.4%), followed by Site 14 'Land adjacent to the existing caravan site, Bentley' (258 or 11.3%) and Site 9 'The Old A12 works Site, Ingatestone' (254 or 11.1%).
- 3.8 Of the existing unauthorised/temporary planning permission sites, the site with the highest 'YES' response was Site 2 'Land off Roman Road, Mountnessing (247 or 10.8).

- 3.9 The site with the lowest number of 'YES' responses was Site17 'Hutton Country Park' (35 or 1.5%), followed by Site 8 'Former Holly Trees School Playing Field, Warley' (72 or 3.1%).

Table 3: Extent of objection for each site/location (i.e. 'NO' Response)				
Site/Location	Permanent		Transit	
	Number	%age	Number	%age
Site 17: Hutton Country Park	1750	76.4	1724	75.3
Site 18: Land at Lower Road, Mountnessing	1670	72.9	1645	71.8
Site 6: William Hunter Way Car Park	1664	72.7	1621	70.8
Site 8: Former Holly Trees School Playing Field, Warley	1646	71.9	1621	70.8
Site 13: Land at Thoby Priory, Mountnessing	1600	69.9	1581	69.0
Site 1: Land off Stock Lane, Ingatestone	1582	69.1	1588	69.3
Site 2: Land off Roman Road, Mountnessing	1532	66.9	1559	68.1
Site 11: Land at Swallows Cross	1527	66.7	1508	65.9
Site 12: Land to the North of A127/West of A128	1505	65.7	1477	64.5
Site 10: Land off Wenlocks Lane	1499	65.5	1482	64.7
Site 9: Old A12 Works Site, Ingatestone	1483	64.8	1407	61.4
Site 3: Land by Navestock Side (Hope Farm)	1461	63.8	1444	63.1
Site 4: Land at Curtis Mill Lane	1458	63.7	1443	63.0
Site 7: Chep Site, Warley Street	1450	63.3	1381	60.3
Site 16: Land nest to CA Site, Coxtie Green Road	1447	63.2	1393	60.8
Site 5: Land off Chivers Lane and the Clapgate Estate	1424	62.2	1396	61.0
Site 15: Land by A12/M25	1419	62.0	1346	58.8

Site 14: Land adj. the existing caravan site, Bentley	1394	60.9	1355	59.2
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- 3.10 The highest number of 'NO' responses was to Site 17 'Hutton Country Park' (1750 or 76.4%) followed by Site 18 'Land at Lower Road, Mountnessing (1670 or 72.9%), Site 6 'William Hunter Way Car Park (1664 or 72.7%) and Site 8 'Former Holly Trees School Playing Field, Warley (1646 or 71.9%).
- 3.11 The least number of 'NO' responses was Site 14 'Land adj. the existing caravan site Bentley' (1394 or 60.9%), followed by Site 15 'Land by A12/M25' (1419 or 62.0%). All sites, however, had a 'NO' response in excess of 60% of total responses.

The Interim Sustainability Appraisal of the Issues and Options Stage 2: Suggested Sites

- 3.12 As part of the DPD process, each stage of the document production is subject to a sustainability appraisal. Each of the 18 suggested sites were assessed against a number of locational criteria to assess their suitability in terms of sustainable development issues. The report was published on the Council's web site together with the consultation document.
- 3.13 As a result of the Sustainability Appraisal (SA), of the 18 sites suggested to the Council, the SA process marked eight as questionable for consideration as a preferred option. Whilst the SA has 'flagged' these sites this does not necessarily exclude them from being taken forward by the Council as more detailed studies and design may go some way to mitigating the possible predicted impacts. The SA is one part, albeit an important one, of the Council's information base in determining how to take the DPD forward.
- 3.14 The sites that were flagged are:
- Site 3 - Land at Navestock Side (proximity to services and facilities; proximity to SSSI)
 - Site 4 – Land at Curtis Mill Lane (proximity to infrastructure; proximity to SSSI; proximity to services and facilities)
 - Site 5 – Land off Chivers Lane and the Clapgate Estate (proximity to SSSI; proximity to services and facilities)
 - Site 11 – Land at Swallows Cross (flood risk; proximity to services and facilities; proximity to site of local nature conservation importance)
 - Site 12 – Land to the north of the A127/West of A128 (proximity to a SSSI; proximity to services and facilities)
 - Site 15 – Land at A12/M25 (flood risk; proximity to site of local nature conservation importance)
 - Site 17 – Hutton Country Park (flood risk; proximity to services and facilities; proximity to site of local nature conservation importance); and
 - Site 18 – Land at Lower Road Mountnessing (flood risk; proximity to services and facilities)

- 3.15 Two of the sites that were flagged at the earlier stage of consultation have been put forward as proposed authorised sites (Sites 3 and 4). As part of this consultation, all of the sites have been reviewed through the sustainability appraisal (see accompanying Sustainability Appraisal document), and the outcomes incorporated into the SA assessment in the following section on the Proposed Sites.

A Draft Criteria Based Policy

- 3.16 Taking account of the advice in Circular 1/2006, the Sustainability Appraisal and the comments received on the 'Issues and Options' consultation documents, the Council has drafted a criteria-based policy, to be used to consider the appropriateness and suitability of any site for the accommodation of Gypsies and Travellers. This has been applied to the proposed sites in the consultation document and will also apply to any further sites to meet the Post 2011 needs.

Draft Policy for the Consideration of Proposals for a Permanent Gypsy and Traveller Site

ANY PROPOSAL FOR A GYPSY AND TRAVELLER SITE WILL NEED TO MEET THE FOLLOWING CRITERIA:

- (i) THE SITE DOES NOT GIVE RISE TO UNACCEPTABLE HARM TO THE GREEN BELT**
- (ii) THE SITE HAS SATISFACTORY ACCESS TO THE MAIN ROAD NETWORK;**
- (iii) THE SITE IS WELL LOCATED IN RELATION TO EXISTING SCHOOLS, SHOPS, HEALTH FACILITIES AND OTHER SERVICES;**
- (iv) THE SITE PROVIDES AN ACCEPTABLE LIVING ENVIRONMENT FOR ITS RESIDENTS;**
- (v) THE SITE WOULD NOT OVER-DOMINATE THE EXISTING RESIDENTIAL COMMUNITY OR HAVE ANY OTHER UNACCEPTABLE ADVERSE IMPACT ON THE AMENITIES OF NEARBY RESIDENTS;**
- (vi) THE SITE WOULD NOT HAVE AN UNACCEPTABLE ADVERSE IMPACT ON THE CHARACTER AND APPEARANCE OR THE BIODIVERSITY VALUE OF THE SITE AND ITS SURROUNDINGS;**
- (vii) THE SITE IS OR IS CAPABLE OF BEING WELL SCREENED;**
- (viii) THE SITE IS NOT LOCATED WITHIN AN AREA AT RISK OF FLOODING**

- 3.17 Whilst there were a variety of views on a preferred site size, the general view presented in the consultation responses, both from the residents, representatives of Gypsies and Travellers and others, was that any site should be limited in size, possibly no more than 5 or 6 pitches.

4. The Proposed Sites

Sites to Meet the Needs to 2011

- 4.1 The following sites are proposed by the Council for consideration to meet the 15 pitch requirement to 2011.
- 4.2 In determining that the following sites should be put forward for consultation as the preferred sites, the Council decided that it would be preferable, taking into account the factors set out in Section 3, to consider existing sites with temporary planning permission or other existing unauthorised sites rather than to identify new sites.
- 4.3 Whilst there will be undoubtedly contrary views to this proposed way forward, part of the assessment of soundness of any policy and proposals is deliverability and certainty of implementation. The regional plan sets a very challenging target to all authorities to meet their existing local needs at 2006 by 2011.
- 4.4 The identification of existing Gypsy and Traveller sites to meet the 15 pitch requirement clearly shows that the sites are acceptable to Gypsy and Traveller families and that once adopted the plan will have delivered the requirement by 2011.
- 4.5 The Council wants to receive your views on these sites and an explanation of your views for or against any proposed site. Additionally, if you consider that any of these sites are not appropriate you should put forward what you consider to be a more appropriate site or sites, as the Council is required to provide for a minimum of 15 pitches. These may be one or more of the discounted sites also set out in the consultation document or an alternative suggestion, particularly if you are able to identify a non-Green Belt site. Any alternative should have regard to the policy criteria set out on page 17 of this document.

Site 1: Willow Farm, Stock Lane, Ingatestone

Site Area: Approximately 1.2 hectares.

Number of Pitches: 5

Site Description: The site is an existing Gypsy and Traveller site, with temporary planning permission until April 2011. It is located on the northern side of Stock Lane and is separated from the village of Ingatestone to the west by the railway line. The site has been divided into 6 pitches, 5 of which are occupied.

The site is surrounded by dispersed farm buildings and residential properties and to the west, adjacent to the railway line, a vehicle repair garage business.

Local Plan Allocation: The site is within the Metropolitan Green Belt and Special Landscape Area.

Site History: The site was first occupied by the existing Gypsy and Traveller families in 2003, at which time the Council took enforcement action. A public inquiry was held in July 2004 in respect of appeals against the enforcement notice and a related retrospective planning application. The Secretary of State subsequently dismissed both appeals, but in upholding the enforcement notice extended the period for compliance to 18 months. Shortly before that period expired in January 2007 another application was made for the retention of the Gypsy caravan site. An appeal against the refusal of planning permission was held in February 2008 and in April 2008 the Appeal Inspector allowed the appeal and granted a temporary planning permission for 3 years.

Sustainability Appraisal Assessment: There are no issues arising out of the SA

Draft Policy Criteria:

- Harm to the Green Belt – Site is in the Green Belt, but harm not considered unacceptable
- Satisfactory road access – good access to Ingatestone High Street (B1002) and A12
- Accessible to schools, shops, health services etc. – Located on edge of Ingatestone village
- Acceptable living environment - Yes
- Not over dominant and no adverse impact on amenities - No
- No adverse environmental impact – Not within or adjacent to any environmental designations
- Is or capable of being well screened - Yes
- No flood risk – Not within flood risk area

Site 2: Roman Triangle, Roman Road, Mountnessing

Site Area: Approximately 0.3 hectares.

Number of Pitches: 5

Site Description: The site is an existing Gypsy and Traveller site with temporary planning permission to April 2012. It is located on the south side of the Roman Road immediately abutting the eastern edge of Mountnessing village. The site has been divided into 5 pitches.

The land is bounded on its south-western side by residential properties. The south-eastern boundary of the site abuts the A12 carriageway, and is screened by an earth bund. To the north of the site is open agricultural land apart from four detached cottages fronting onto Roman Road.

Local Plan Allocation: The site is within the Metropolitan Green Belt and Special Landscape Area.

Site History: Prior to April 2003 the land was unused. Between 1979 and 1989 the Council determined three separate outline planning applications proposing the residential development of the land, all of which were refused planning permission

on the grounds of the inappropriateness of the proposal and the site's unacceptable proximity to the A12 Trunk Road. In two of these cases appeals were lodged and subsequently dismissed

The site was first occupied in 2003, and in April 2003 a Stop Notice and Enforcement Notice was served on the Occupiers. A planning application was subsequently made for, among other things, the change of use of the land from agriculture to residential use and the stationing of 5 mobile homes and 2 touring caravans. The application was refused and enforcement action taken. A subsequent appeal against each notice was part allowed, part dismissed; in that the time for compliance was extended from 28 days to 1 year (compliance was required by 30 September 2005).

A further application was submitted in November 2005 seeking the continued use of land for residential purposes together with the stationing and occupation of 5 replacement mobile homes and 5 touring caravans. Following an inquiry, the Inspector allowed the appeal and granted a temporary permission for 5 years to April 2012.

Sustainability Appraisal Assessment: This site is within an Air Quality Management Area, but it is understood that a further assessment is likely to take it out of an AQMA.

Draft Policy Criteria:

- Harm to the Green Belt – Site is in the Green Belt, but harm not considered unacceptable
- Satisfactory road access – the site fronts the B1002 with good access to A12
- Accessible to schools, shops, health services etc. – Located on the edge of Mountnessing village
- Acceptable living environment – The original SA identified the site within an AQMA, but this is now unlikely to be the case
- Not over dominant and no adverse impact on amenities - No
- No adverse environmental impact - Not within or adjacent to any environmental designations
- Is or capable of being well screened - Yes
- No flood risk – Not within a flood risk area

Site 3: Hope Farm, Horsemanside/Goatswood Lane, Navestock

Site Area: Approximately 0.4 hectares.

Number of Pitches: 1

Site Description: The site is an existing Gypsy and Traveller site with temporary planning permission until November 2012. It is located on land on the southern side of Goatswood Lane, near its junction with Horseman Side.

The area is predominantly open countryside with some dispersed farm and residential properties. Another unauthorised residential Gypsy site is located to the south east of the site.

Local Plan Allocation: The site is within the Metropolitan Green Belt and within an Article 4 Area (removing permitted development rights for walls, gates, fences and other means of enclosure; temporary buildings, structures, works, plant or machinery; and the temporary use of land).

Site History: The field was formerly in agricultural use. The site was first occupied in August 2002. In October 2002 the Council refused planning permission for a change of use of land to allow the siting and residential occupation of three mobile homes and took enforcement action. The Applicants appealed both enforcement notices and at an inquiry held in July/October 2003, the notices were quashed and a temporary planning permission granted for 3 years for no more than one twin mobile home, two single unit mobile homes (or two large touring caravans) and one touring caravan.

In March 2007 an application for renewal of the temporary planning permission was refused, and enforcement action authorised, but with a two year period for compliance. In November 2008, an appeal against the enforcement notice was allowed and temporary permission granted for 4 years.

Sustainability Appraisal Assessment: Flagged due to Proximity to Services and SSSI

Draft Policy Criteria:

- Harm to the Green Belt – Site is in the Green Belt, but harm not considered unacceptable
- Satisfactory road access – Good access to A12 via Church Road
- Accessible to schools, shops, health services etc. – 2km from Harold Wood
- Acceptable living environment - Yes
- Not over dominant and no adverse impact on amenities - No
- No adverse environmental impact – Not within any environmental designations but some 500m from a SSSI
- Is or capable of being well screened - Yes
- No flood risk – Not within a flood risk area

Site 4: Treetops, Curtis Mill Lane, Navestock

Site Area: Three plots, one plot measuring 0.11 hectares and 2 plots both measuring 0.15 hectares.

Number of Pitches: 3

Site Description: The site is an existing Gypsy and Traveller site with temporary planning permission until June 2012. It is located on land on the eastern side of Curtis Mill Lane.

The area is predominantly open countryside with some dispersed farm and residential properties. To the east of the site is an area of woodland designated as a Site of Special Scientific Interest.

Local Plan Allocation: The site is within the Metropolitan Green Belt.

Site History: The lawful use of the site is for agriculture. The site was first occupied in 2003. In November 2003 the Council refused planning permission for retention of mobile homes on the 3 plots and took enforcement action. The subsequent appeals were dismissed in November 2004.

In November 2005 a further planning application was submitted for the retention of use of the land to residential and the stationing of 3 mobile homes for occupation by a Gypsy family. This was subsequently refused and enforcement action taken.

However, following the identification of this site as one of the preferred locations by the Council in March 2009, an application was invited and in June 2009 a three year temporary planning permission was granted.

Sustainability Appraisal Assessment: Flagged due to Proximity to Services, Infrastructure and SSSI.

Draft Policy Criteria:

- Harm to the Green Belt – Site is in the Green Belt, but harm not considered unacceptable
- Satisfactory road access – Access to A12 via Harold Wood and Colliers Row
- Accessible to schools, shops, health services etc. – Located 4 km from Harold Wood
- Acceptable living environment - Yes
- Not over dominant and no adverse impact on amenities - No
- No adverse environmental impact – Not within any environmental designations but adjacent to a SSSI
- Is or capable of being well screened - Yes
- No flood risk – Not in a flood risk area

Site 5: Cottage Garden, Beads Hall Lane, Pilgrims Hatch

Site Area: 0.15 hectares

Number of Pitches: 1

Site Description: The site is an existing Gypsy and Traveller site with temporary planning permission until October 2011. It is located on land on the eastern side of Beads Hall Lane.

The area is predominantly open countryside with some dispersed farm and residential properties. Some 100m to the south of the site is the edge of the built up area of Pilgrims Hatch.

Local Plan Allocation: The site is within the Metropolitan Green Belt.

Site History: In 2003 an enforcement notice was served relating to the change of use of the land from agricultural to a residential use. Subsequently an application was made for the retention of the residential use of land and associated hard standing together with the siting of a mobile home in December 2005 (BRW/1100/2005). In this case, on balance, given the scale of the development, it was considered that there were very special circumstances to justify the grant of planning permission, but for a temporary period to allow for the resolution of the issues concerning the Gypsy and Traveller DPD and the efforts of the applicant to consider alternatives. A personal temporary permission to 1 July 2009 was granted at the Planning Development Control Committee in June 2007. Permission was also granted for a proposed domestic stable building for a temporary period, again expiring on 1 July 2009, but was not implemented.

In June 2009 an application was made for permanent planning permission for the retention of residential use of the land and associated hard standing together with the siting of a mobile home, erection of a day room and stables (BRW/414/2009). Permission was granted on 22 October 2009 for a temporary two year period for a revised description of development excluding the day room and stables.

Sustainability Appraisal Assessment: No significant issues arising out of the SA

Draft Policy Criteria:

- Harm to the Green Belt – Site is in the Green Belt, but harm not considered unacceptable
- Satisfactory road access – Access to A129 via Hatch Road
- Accessible to schools, shops, health services etc. – Located on edge of Pilgrims Hatch
- Acceptable living environment - Yes
- Not over dominant and no adverse impact on amenities - No
- No adverse environmental impact – Not within any environmental designations
- Is or capable of being well screened - Yes
- No flood risk – Not within a flood risk area

Sites to Meet the Needs after 2011

- 4.6 It is not the intention in this document to identify particular sites to provide for the ongoing need post 2011 set out in the regional plan (i.e. 9 pitches based on a 3% compound increase per year to 2021 on the total number of authorised sites at 2011). This is because it is considered that any further pitches should be provided either on or adjacent to existing authorised sites or, as necessary, on additional new sites.
- 4.7 The appropriateness of providing for additional needs on (or adjacent) to existing sites will be determined by where the specific need arises, the ability to

accommodate further pitches on (or adjacent) to an existing site and conformity with the final criteria based policy.

- 4.8 Any new site to meet ongoing needs post 2011 will be assessed against the final criteria based policy.

5. The Discounted Sites

- 5.1 In determining the preferred sites to take forward, the Council has discounted the other alternative site suggestions in the Stage 2 consultation and other existing unauthorised sites for the following reasons.

(i) Sites within the Flood Risk areas:

- Land off Wenlocks Lane (Suggested Site 10 in Stage 2 consultation)
- Land at Swallows Cross (Suggested Site 11 in Stage 2 consultation)
- Land by A12/M25 (Suggested Site 15 in Stage 2 consultation)
- Hutton Country Park (Suggested Site 17 in Stage 2 consultation)
- Land at Lower Road Mountnessing (Suggested Site 18 in Stage 2 consultation)

(i) Sites with planning permission for development and/or allocated for development in the Brentwood Replacement Local Plan.

- William Hunter Way Car Park (Suggested Site 6 in Stage 2 consultation) – shopping/leisure/residential and car parking.
- Chep Site, Warley Street (Suggested site 7 in Stage 2 consultation) – Office business park
- Land at Lower Road Mountnessing (Suggested Site 18 in Stage 2 consultation) – Hotel, petrol filling station and shopping uses.

(iii) Sites with Open Space designations

- Former Holly Trees School Playing Fields (Suggested Site 8 in Stage 2 consultation) - allocated as Protected Urban Open Space
- Hutton Country Park (Suggested Site 17 in Stage 2 consultation) – Country Park and Local Nature Reserve

(iv) Sites affected by Environmental/Biodiversity/Heritage designations

- Land off Wenlocks Lane (Suggested Site 10 in Stage 2 consultation) – Wenlocks Lane is a Protected Lane
- Hutton Country Park (Suggested Site 17 in Stage 2 consultation) – Country Park and Local Nature Reserve

- Land at Thoby Priory, Mountnessing (Suggested Site 13 in Stage 2 consultation) – Grade 2 agricultural land and site of Scheduled Ancient Monument
- Plot 1, Oak Tree Farm (existing unauthorised site) - Grade 2 agricultural land
- Weald View, Lincolns Lane (existing unauthorised site) – adjacent Historic Park and Garden

(v) Sites with unsatisfactory living environment

- Land next to CA site on Coptie Green Road (Suggested Site 16 in Stage 2 consultation) – proximity to Civic Amenity site
- Land by A12/M25 (Suggested Site 15 in Stage 2 consultation) – proximity to M25/A12 Air Quality Management Area
- Old A12 works site, Ingatestone (Suggested Site 9 in Stage 2 consultation) – located between A12 and the London to Norwich main line railway

(vi) Sites with poor accessibility

- Land off Chivers Lane and the Clapgate Estate (Suggested Site 5 in the Stage 2 consultation)
- Land at Swallows Cross (Suggested Site 11 in the Stage 2 consultation)
- Land to the north of the A127 (Suggested site 12 in the Stage 2 consultation)

(vii) Other sites – these two sites are in close proximity to Hope Farm, Horseman Side, and in an area where a number of Gypsy and Traveller sites already exist.

- Lizvale, Goatswood Lane (existing site with temporary planning permission)
- Orchard View, Horseman Side (existing site with temporary planning permission)

6. The Sustainability Appraisal and Habitat Regulations Assessment

Background

- 6.1 As part of the process of producing DPDs, the Act requires a Sustainability Appraisal (SA) to be undertaken in parallel with preparation of the DPD. The SA process also incorporates the requirements for an environmental assessment of plans and programmes under Article 13.3 of the Strategic Environmental Assessment Directive (Regulation 6.2).
- 6.2 The SA is an iterative process that seeks to identify and report on the likely significant effects of the plan policies and proposals, and identify the extent to which it will deliver sustainable development objectives.
- 6.3 A Habitats Regulations Assessment has also been undertaken to comply with the requirements of the EC Habitats Directive 1992 and the Conservation (Natural Habitats etc) Regulations 1994 (as amended 2007). These require that land use plans are subject to an Appropriate Assessment if they are likely to have a significant adverse effect on a Natura 2000 site (Special Areas of Conservation or Special Protection Areas). Ramsar sites are also included under government policy (PPS9).
- 6.4 The screening process concluded, however, that the DPD does not include policies or site allocations that could lead to a significant effect on European protected sites either alone or in combination with other plans, subject to a policy amendment to mitigate any adverse impacts on water quality or freshwater inputs.

The Sustainability Appraisal of the Gypsies and Travellers DPD

- 6.5 The SA of this Gypsy and Traveller DPD is being undertaken by consultants, Scott Wilson, on behalf of the Council.
- 6.6 The first stage in producing the SA was to establish the baseline information. A baseline evidence report has been prepared by Essex County Council, and can be viewed on the Council website at http://www.brentwood.gov.uk/pdf/pdf_1270.pdf.
- 6.7 As part of the first stage of the SA, a scoping report was also prepared and sets out the appraisal objectives, reviews relevant plans and programmes, and refers to the baseline information.
- 6.8 At each successive stage of document production in the preparation of the DPD an associated Sustainability Appraisal report is also prepared and published for comments. The SA report on this Pre-Submission Draft Plan consultation and earlier SA documents are available to view on the Council's website. The outcome of the SA on the proposed sites is set out above.

7. Equality Impact Assessment

- 7.1 The Race Relations (Amendment) Act 2000 requires public authorities to promote good race relations and specifically to undertake a Race Equality Impact Assessment of various policy documents. Further to this, and the statutory requirements of the Single Equality Act 2005, the Disability Discrimination Act 2005 and the Local Government Equality Standard, the Council intends to undertake an Equality Impact Assessment of its Services, policies, procedures and practices, including policy documents.
- 7.2 In preparing this DPD, therefore, the Council has fully considered the relevant equality issues and take them into account.
- 7.3 Gypsies and Travellers are a long established ethnic group and Circular 1/2006 states that they are believed to experience the worst health and education status of any disadvantaged group in England.
- 7.4 The adoption of the DPD is likely to have very positive impacts, both in terms of the accommodation needs of Gypsies and Travellers and also in helping to resolve the problems of unauthorised encampments and developments and the improvement of relations between the settled and travelling communities.
- 7.5 In providing permanent residential sites, younger family members will benefit from better access to education, all family members, but particularly young or expectant mothers and the elderly, will have access to health care, and there will be better access to employment and other social facilities.
- 7.6 There will, clearly, be some existing Gypsy and Traveller families on unauthorised sites in the borough who are not provided for within the borough's requirement for additional pitches. In so far as some of the recently arising need is met elsewhere, the fact that the total calculated need in greater Essex through the Regional Spatial Strategy process closely balances the level of provision, this should limit the distance, and therefore the adverse impact, which these families have to move in order to obtain alternative accommodation. This was a conclusion in the RSS Panel Report (December 2008).

Appendix 1: Proposed Sites – Location Plans



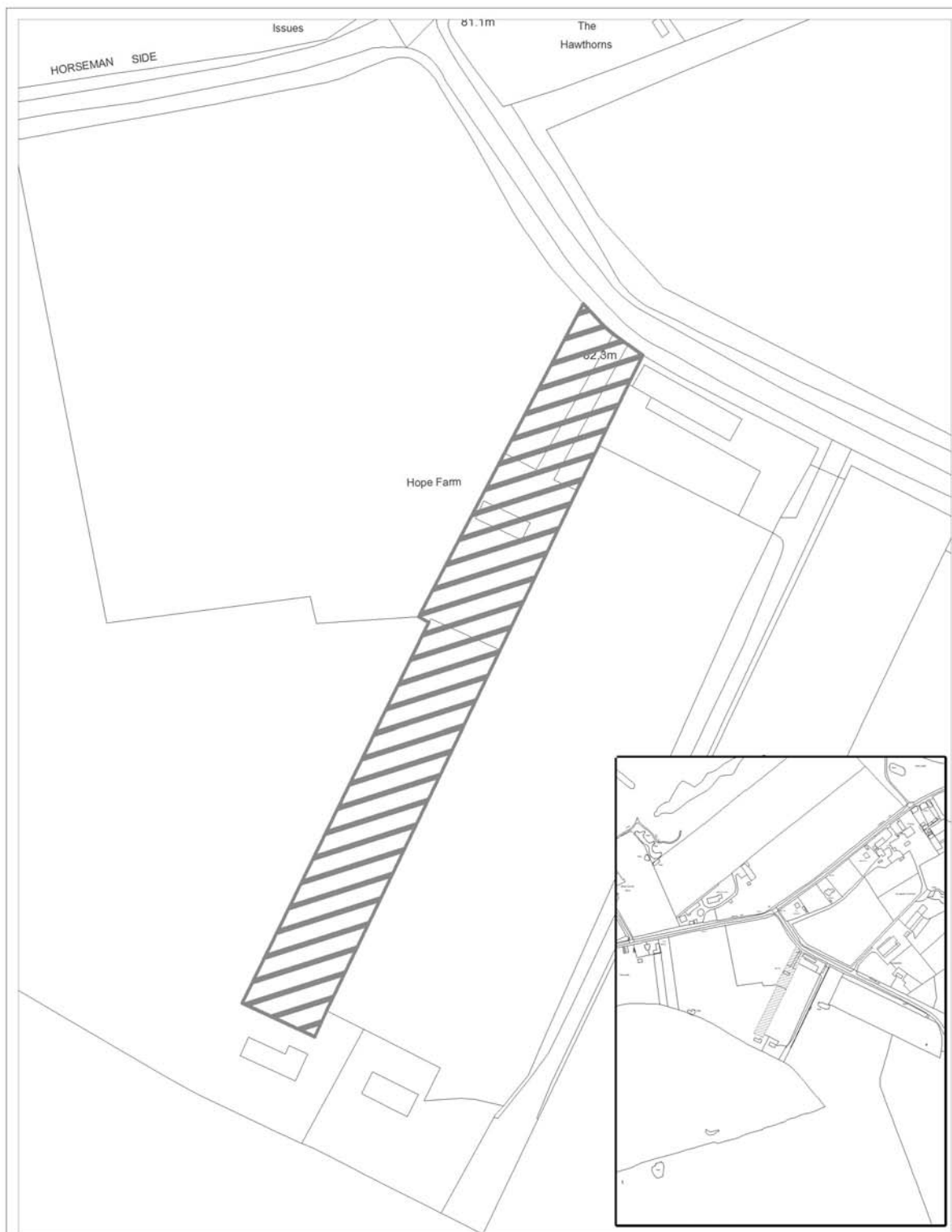
Title Site 1 Willow Farm, Stock Lane, Ingatestone
 Scale 1:1250
 Date 2nd December 2009

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Title Site 2 Roman Triangle, Roman Road, Mountnessing
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 Date 2nd December 2009

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Title Site 3 Hope Farm, Horsemanside/Goatswood lane, Navestock
 Scale 1:1250
 Date 2nd December 2009

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Title Site 4 Treetops, Curtis Mill Lane, Navestock
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Title Site 5 Cottage Garden, Beads Hall Lane, Pilgrims Hatch
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