

Statement of Consultation Appendix – Part 6

Promoting Healthy Communities and Gypsy & Traveller Site Provision Allocations Policy

Summary of Comment	Summary Reference	Council Response	Council Action	Consultee Rep ID
Chp 11 Housing				
Inconsistency in densities applied to proposed development locations.	CHP11.1	In preparing the Draft Local Plan guidance on the densities that were appropriate in each location were taken from the Outline Landscape Appraisal, which was tasked to consider the capacity of the potential development locations to accommodate housing growth, including considerations of scale and density. It was however considered that a density of 35duph would not be appropriate for site H19, and therefore a lower density was proposed for this site to better reflect the surrounding urban development. It is considered that the approach taken to development densities is appropriate.	None required.	DLP/20154, DLP/20177, DLP/2182
Higher densities should be applied to new development locations to reduce the amount of Green Belt land required.	CHP11.2	It is agreed that higher density development would provide the same number of homes over a smaller area of land, however such higher densities may have a greater impact on landscape character in some locations. This is however a matter open for further consideration as the plan is progressed to submission.	Consider whether higher densities should be sought on proposed development sites in order to reduce the land-take for housing. Amend policies H7 and H9-H27 accordingly if necessary.	DLP/2182
Development proposed on sites where applications for residential development have been refused.	CHP11.3	The NPPF is clear that applications for development within the Green Belt should only be approved in very special circumstances. Green Belt should only be altered through the plan-making process. The Local Plan is that plan-making process and may consider the release of Green Belt sites, where development proposals may previously have been proposed, where exceptionally required to meet the needs for sustainable development. Various planning inspectors have concluded for local plans across the Country that housing need provides such exceptional circumstance.	None required.	DLP/2182DLPQQ/672

All new homes should be of a high quality on all sites.	CHP11.4	It is recognised that there is inconsistency between policies H7 - H29 in relation to whether the requirement on site is for homes or high quality homes. It is agreed that all homes should be of a high quality and that this should be consistently required.	Review policies H7 to H29 to ensure high quality homes are specifically required on all strategic housing sites.	DLP/1858, DLP/1879
Call for sites process results in a developer led plan.	Chp11.5	Paragraph 47 requires local plans to identify deliverable/developable sites. If a landowner has no intention of his land being used for the delivery of housing then sites are not deliverable/developable. The call for sites process overcomes this issue. Not all sites, or the full extent of sites, identified through the call for sites process have been included in the local plan.	None required	DLP/2539
Phasing should be used to ensure a brownfield first approach to delivery.	Chp11.6	The Council does not currently have a five year housing land supply from land within the urban area (predominantly brownfield land). Artificially phasing sites will prevent the Council achieving a five year housing land supply, and act to put land not allocated through the Local Plan at risk of planning by appeal.	None required	DLP/2539, DLP/386
Support for the allocation of specific sites within the Draft Local Plan.	Chp11.7	Support noted.	None required	DLP/5445, DLP/5446, DLP/5447, DLP/5448, DLP/5449, DLP/5450, DLP/5451, DLP/5452, DLP/5453, DLP/5454, DLP/5455, DLP/5456, DLP/5457, DLP/5458, DLP/5459, DLP/5460, DLP/5461, DLP/5462, DLP/5463, DLP/5464, DLP/5465
Consideration should be given to heritage assets in the site allocations for Wickford	Chp11.8	The plan should be read as a whole. The policies in chapter 17 set out how the historic environment will be considered when development is proposed.	None required.	DLP/722
Concern that environmental loss will occur before any mitigation measures are put in place resulting in environmental harm.	CHP11.9	Policy IMP4 deals with phasing of development. This policy is very clear that phasing mechanisms will be used to ensure environmental mitigation takes place before	None required.	DLP/1480, DLP/1655

		development. The plan should be read as a whole.		
Alternative urban development options for station car park promoted by Town Council.	CHP11.10	The Council has carried out a thorough appraisal of the urban area as part of the HELAA to determine the capacity of the urban area to accommodate growth. It has been determined that there is capacity for around 6,500-7,000 homes to be accommodated within the existing urban area, leaving a requirement as defined by the OAN for some homes to be accommodated in urban extensions on sites currently within the extent of the Green Belt. The proposed alternative development options is on land not promoted for development purposes by the landowner, and is not reasonably available for development. It is not therefore included in the HELAA, or in the urban land supply for that reason.	None required.	DLP/1655
Natural England are concerned that a number of the allocations (H7, H10, H12, H13, H15, H17, H19, H23 and H26-28) will have impacts on the natural environment. The approach taken in the policies is supported by improved clarity over the delivery and funding of mitigation should be more clearly set out in the policies.	CHP11.11	The advise of Natural England in this regard is welcomed. Policy IMP3 is clear that conditions on phasing will be used to secure timely environmental mitigation and that un-mitigated environmental harm will not be permitted. Policy IMP 2 is meanwhile clear that planning obligations will be used to secure Green Infrastructure including biodiversity enhancements and mitigation. It is also clear that where harm cannot be mitigated development will be refused. The structures for environmental mitigation sought by Natural England are therefore present within the plan, although it is agreed that the listed policies could be made more explicit in regard to these requirements. The Council will liaise with Natural England in making the required changes to ensure that their concerns are addressed.	In liaison with Natural England amend policies H7, H10, H12, H13, H15, H17, H19, H23 and H26-H28 to be more explicit about the delivery and funding of environmental mitigation requirements.	DLP/2729

LLFA supports the approach taken to flood risk in policies H7 to H27.	CHP11.12	support noted.	None required.	DLP/2609, DLP/2610, DLP/2612, DLP/2613, DLP/2614, DLP/2616, DLP/2617, DLP/2618, DLP/2620, DLP/2621, DLP/2630, DLP/2631, DLP/2632, DLP/2633, DLP/2634, DLP/2635, DLP/2636, DLP/2637, DLP/2638, DLP/2639, DLP/2640
Opportunities may exist around the Wickford Church of England School to increase primary provision in Wickford by introducing junior provision. This aligns with the aspirations of the school.	CHP11.13	Information noted.	None required.	DLP/2618, DLP/2620, DLP/2621, DLP/2630, DLP/2631
25% of secondary school places in Wickford are taken up by children from outside the catchment. Most of the growth requirement will therefore be met through displacement of out of catchment children. Some additional growth could be accommodated at the Bromfords School. The Beauchamps School is on a constrained site.	CHP11.14	Information noted.	None required.	DLP/2618, DLP/2620, DLP/2621, DLP/2630, DLP/2631
40% of secondary school places in Billericay are taken up by children from outside the catchment. Most of the growth requirement will therefore be met through displacement of out of catchment children. Some additional growth could be accommodated at the	CHP11.15	Information noted.	None required.	DLP/2632, DLP/2633, DLP/2634, DLP/2635, DLP/2636, DLP/2637, DLP/2638, DLP/2639, DLP/2640

Mayflower School. The Billericay School is on a constrained site.				
The highways mitigation modelling shows that a combination of improvements will improve the capacity of the local highway network around Billericay, enabling it to accommodate additional development and background growth. Further modelling is however needed to refine the mitigation options.	CHP11.16	Information noted regarding the highway capacity in Billericay. Additional work is underway in partnership with Essex County Council and Essex Highways to refine the highways mitigation options for Billericay, to inform the submission Local Plan.	Amend the supporting text to policies H19 to H27, and where appropriate policies H19 to H27, and any associated transport policies to reflect the findings of the additional refinement of mitigation modelling undertaken for Billericay.	DLP/2632, DLP/2633, DLP/2634, DLP/2635, DLP/2636, DLP/2637, DLP/2638, DLP/2639, DLP/2640
Primary School provision in Billericay should be increased to support housing growth / new primary school required.	CHP11.17	Concern about primary school provision in Billericay noted. The County Council have advised that the best approach to increasing capacity to align with growth is through the expansion of local schools, which will be funded via S106 or CIL contributions. The IDP will provide more certainty on which funding stream will be applied prior to the finalisation of the Local Plan for submission. It is noted that some consultees believe an additional primary school is required to meet this need. The Borough Council will undertake further discussions with the County Council to ensure that the approach to meeting the need for primary school places in Billericay is appropriate, and will not result in any deficit.	1) In the IDP provide enhanced clarity over the funding stream to be used to meet primary school needs in Billericay. Clarity should provided around all funding sources where possible. 2) Discuss with the County Council the approach to meeting primary school needs in Billericay to ensure it will deliver sufficient spaces.	DLP/390, DLP/391, DLP/392, DLP/393, DLP/395, DLP/796DLPQQ/954, DLPQQ/778, DLPQQ/612
Infrastructure should be delivered in Billericay before any development occurs	CHP11.18	Noted. The Council will be seeking to align the provision of new homes with infrastructure in accordance with the requirements of the NPPF. This means that planning obligations, CIL and phasing will be used to ensure that infrastructure	None required.	DLP/390, DLP/391, DLP/392, DLP/393, DLP/395, DLP/155, DLP/819, Likely to be covered in IMP summaries

		deficits do not arise. The requirements for this are set out in policies IMP1, IMP2 and IMP3.		
A purpose built healthcare centre for Billericay is sought.	CHP11.19	Noted. The NHS is responsible for determining how healthcare services are delivered at a local level. The Local Plan does have a role to play in ensuring that land and/or buildings are available to deliver the NHS strategy in this regard. The Council have been engaging with the NHS to determine what land and/or buildings they may require in Basildon Borough. These conversations are ongoing, and will be used to inform any specific requirements for healthcare services set out in the submission Local Plan and the IDP. It should be noted that the IDP is a living document that will evolve over time, and can capture increased certainty by the NHS in how they intend to deliver services as their strategy evolves.	None required.	DLP/390, DLP/391, DLP/392, DLP/393, DLP/395DLPQQ/991
Development on sites within the current extent of the Green Belt should be lower density and low in height (2-2.5 storeys)	CHP11.20	Noted. The densities proposed for most development sites would result in relatively low density development compared to what is seen in town centre locations. These densities are based on advice emerging from the Outline Landscape Appraisals and therefore take into account the landscape capacity to accommodate development at different densities. It should however be noted that by actively seeking lower density development, a larger proportion of Green Belt land is required to meet the same housing need, and that other consultees have therefore suggested the converse for that reason.	None required.	DLP/390, DLP/391, DLP/392, DLP/393, DLP/395
A multi-user route should be provided through sites H20-H23. This should be linked to a multi-user crossing over the railway line linking to settlements to the north. The	CHP11.21	Consideration will be given to the practicality of this request in discussion with Essex County Council. If it is considered to be a deliverable proposal, consideration will be given to incorporating a requirement into policies H20 to H23, and into the associated IDP.	Discuss the deliverability of this proposal with Essex County Council. If deliverable, consider incorporating a requirement into policies H20 to H23, and into the associated IDP.	DLP/222, DLP/223, DLP/224, DLP/225, DLP/1438, DLP/1439, DLP/1440, DLP/1441

footpath within site H23 should be upgraded to a Bridleway.				
Objection to the quantum of housing sought in policy H1.	H1.1	Objection noted. The quantum of housing sought in policy H1 reflects the requirement for housing identified in the SHMA, and set out in policy SD1. The SHMA was prepared in accordance with the national Planning Practice Guidance and is considered to be a robust assessment of housing need.	None required	DLP/3360, DLP/3760, DLP/12610DLPQQ/911
Support for policy H1	H1.2	Support noted	None required	DLP/2462, DLP/4463, DLP/10131, DLP/20024,
There should be no phasing in the plan.	H1.3	The Draft Local Plan does not seek to phase development sites identified in this plan, except in cases where infrastructure is required in advance of development. It has however prepared a trajectory of supply, based on its understanding of development constraints, developer readiness and build rates. There is nothing in this plan which requires a developer to deliver in accordance with that trajectory providing the requirements of the relevant allocation policy are met.	None required	DLP/3435
A lower delivery rate should not be applied in the period to 2020. More land should be allocated to meet the OAN for housing and ensure a five year supply.	H1.4	The Council has allocated sufficient land to meet the OAN for housing. It is not considered that allocating additional land is appropriate given the Green Belt constraints and the ability of the area, over the plan period, to meet its OAN.	None required	DLP/578, DLP/667, DLP/695, DLP/1382, DLP/1466, DLP/1990, DLP/1991, DLP/2211, DLP/2217, DLP/2335, DLP/2341, DLP/2352, DLP/2420, DLP/2430, DLP/2439, DLP/2520, DLP/2752, DLP/2773, DLP/2805, DLP/3029, DLP/3054, DLP/3072, DLP/4361, DLP/4601, DLP/4958, DLP/4968, DLP/4975, DLP/7047 DLP/9509, DLP/20646,
Some sites phased later in the plan period could be delivered earlier.	H1.5	The Draft Local Plan does not seek to phase development sites identified in this plan, except in cases where infrastructure is required in advance of development. It has however	None required	DLP/575, DLP/4217

		prepared a trajectory of supply, based on its understanding of development constraints, developer readiness and build rates. There is nothing in this plan which requires a developer to deliver in accordance with that trajectory providing the requirements of the relevant allocation policy are met.		
The rate of housing delivery proposed for the period beyond 2020 of over 800 homes per annum is not realistic/sustainable based on past delivery rates.	H1.6	The rate of housing delivery in the recent past has been suppressed by a lack of housing land supply. One of the purposes of this plan is to overcome that lack of housing land supply in accordance with the NPPF. Additionally, demolitions associated with the redevelopment of the Craylands Estate has acted to suppress net housing growth. Despite these limitations, housing provision in both 2014/15 and 2015/16 has exceeded 600 homes per annum. It is not therefore unreasonable to expect growth beyond 2020 to exceed 800 homes per annum if additional land is made available through the Local Plan. The HELAA identifies a realistic supply of suitable, available and achievable sites for enabling this level of delivery once the Local Plan is in place.	None required	DLP/389, DLP/1083
Over what timescale will housing need be met?	H1.7	The housing requirements of the Local Plan will be met over the period 2014 to 2034. Policy H1 indicates that this will be delivered at a rate of 615 homes per annum to 2020, and then at a rate of 822 homes per annum thereafter. This difference arises from the need for a Local Plan to be in place before some sites within the current extent of the Green Belt can come forward.	None required	DLP/917
Numeric inconsistency / Date inconsistency between policy SD1 and H1.	H1.8	The Council notes this numeric inconsistency and will amend accordingly..	Amend policy SD1/H1 to ensure that the number of homes proposed is consistent over the same timeframes.	DLP/1136

Redevelopment of Laindon Town Centre to provide 200 homes will contribute to capacity in the urban area, reducing pressure on brownfield sites.	H1.9	The Council notes the contribution the redevelopment of Laindon Town Centre will make to housing provision. The capacity of this location has been incorporated into the urban land supply identified in the Draft Local Plan, and does not therefore represent additional supply to that already identified.	None required	DLP/1384, DLP/10131,
Who are new homes for?	H1.10	Paragraph 47 of the NPPF states that Local Plans should plan to meet the full, objectively assessed need for housing. Paragraph 159 confirms that such calculations of need should include both migration and demographic change. This is confirmed within the Planning Practice Guidance. The approach to calculating OAN for housing within the Planning Practice Guidance has been applied in the South Essex SHMA 2016. This identifies the need for housing in Basildon Borough, and forms the basis for the target in the Draft Local Plan.	None required	DLP/101, DLP/2270DLPQQ/992, DLPQQ/968, DLPQQ/559
Open space, as required by part 5b of policy H1, cannot be secured alongside housing in all locations e.g. in town centre locations.	H1.11	It is agreed that on-site open space provision cannot be achieved within every housing development. However, policy H1 does not specifically require this. It requires housing growth and the provision of open space to be aligned where opportunities arise, which allows for flexibility in such instances.	None required	DLP/2046, DLP/3284
Annualised delivery rates should be expressed as minimums.	H1.12	Draft policy H1 does already express the rate for 2015-2020 as a minimum. However, it does not express the rate thereafter in the same way. It is noted that under-delivery in any one year may be constrained by an annualised target which is not expressed as a minimum, and therefore it is recommended that this amendment is made.	Express the rates of delivery in policy H1 as minimums to prevent the target constraining annual supply, and resulting on overall supply being missed.	DLP/2773, DLP/2805, DLP/4463
Open spaces are being developed for housing purposes.	H1.13	It is recognised that in the recent past, a number of open spaces have been developed for housing purposes. This was part of a strategy to make the best use of Council owned land in Basildon, which benefits from above average	None required	DLP/568DLPQQ/149, DLPQQ/963

		provision of open space. However, the Draft Local Plan does not include development of open spaces within its strategy for housing provision.		
The Draft Local Plan should not have been published in advance of the SHMA, as its findings were subject to change.	H1.14	It is agreed that it was not desirable to progress to consultation in advance of the publication of the SHMA. However, Basildon Council was satisfied that the figures in the emerging SHMA were robust and broadly reflected likely need for housing in Basildon. The SHMA was a shared project between five Local Planning Authorities, and it was important that all parties were satisfied with the SHMA in relation to their area before it was published. This resulted in a delay to the publication of the SHMA, which put at risk the Council's timetable for the preparation of the Local Plan. A decision was therefore taken to prepare a topic paper setting out Basildon's results only to accompany the consultation. Observers will note that despite the caveats included in the topic paper, the numbers relating to Basildon in the published SHMA are unchanged compared to the topic paper.	None required	DLP/2341, DLP/2352, DLP/2814
The need for older peoples accommodation should be considered separately in accordance with the latest guidance in the PPG.	H1.15	The need for specialist accommodation for older people has two sources. The first is for those who living within individual dwellings within the community, and will continue to do so even if living in sheltered or extra care accommodation. There is also a need arising from growth in the population of people who live in institutions e.g. care homes. The growth from both of these groups is captured in the details set out against policy H2. It is considered that the need for specialist accommodation such as sheltered and extra care accommodation can and should be accommodated against traditional housing on housing development sites. This should be able to be reasonably achieved on all sites which are	None required	DLP/3054DLPQQ/983

		considered sustainably located for housing. Indeed, proposals for two of the strategic sites identified in the plan have been received showing on-site provision of specialist accommodation for older people. There is therefore no need for the specialist accommodation needs of older people to be treated separately from traditional housing within this plan, as it is evidenced that these needs can be met side by side on sustainably located sites.		
Clarity needed that the requirement for affordable housing is a component of the total housing requirement and not in addition.	H1.16	The need for clarity in this regard is noted and policy H1 will be amended accordingly.	Amend policy H1 to make clear that the affordable housing requirement is a component of the total need for housing and not additional to it.	DLP/3029
Growth in Wickford should not exceed eastward extent of Wickford and degrade Green Belt separation between Wickford and Rayleigh.	H1.17	Concern about the Green Belt separation between Wickford and Rayleigh noted. The eastward extent of sites H14 and H15 have been limited to the current extent of Wickford to ensure separation between these two settlements.	None required.	DLP/3029
Consideration should be given to growth arising from London.	H1.18	As set out in the SHMA Topic Paper, and now made clear in the published SHMA, the GLA Central Scenario has been applied, and the need arising from this forms the lower end of the OAN.	None required.	DLP/2341, DLP/2352
The OAN should include the shortfall arising in the period from 2001 to 2015.	H1.19	The OAN has been calculated using a 2014 baseline. In using such a baseline the population is distributed across the Country at a set point in time, providing a bases for further migration patterns. To include shortfall in calculations prior to that date results in the same need being double counted at a macro scale, and is not therefore appropriate. No amendment is therefore proposed to the Draft Local Plan in this regard.	None required.	DLP/2341, DLP/2352

The SA does not include any sequential analysis of sites.	H1.20	The purpose of the SA is to determine the impacts and suitability of development locations having regard to a range of indicators. Each site is different and will impact on each indicator differently. It is not therefore appropriate to rank sites as suggested, and indeed there is no legal requirement to do so. It is also known that other authorities have experienced difficulties when doing so. Additionally, considerations beyond the SA will determine if and when a site should be made available for development such as infrastructure capacity, availability and viability.	None required.	DLP/2341, DLP/2352
Policy H1 is not clear about how much affordable housing will be sought from individual development sites.	H1.21	Policy H1 sets out the Council's overall requirements and strategy for getting there. The detail required is a matter for planning applications, and is therefore set out in policy H34. No amendment to policy H1 is required.	None required.	DLP/2773, DLP/2805
Support for a market led approach to the release of land.	H1.22	Support noted.	None required.	DLP/2505
ECC will work with Basildon Council to deliver the infrastructure required to support growth.	H1.23	Basildon Council would be pleased to work with ECC in securing the infrastructure needed to support the growth set out in the Local Plan.	Continue to work with ECC to identify and secure the infrastructure required to support the growth set out in the Local Plan.	DLP/2462
Cross reference to the work currently underway at ECC to identify transit sites for the accommodation of gypsies and travellers.	H1.24	It is noted that transit sites have a role in preventing illegal encampments by travelling gypsies and travellers. The Council will therefore liaise with ECC in understanding the work that is underway in identifying a transit site.	In liaison with ECC understand the implications of the work underway to identify transit sites in Essex for gypsies and travellers, and if appropriate amend policy H3 to cross-reference this work.	DLP/2462
Information provided on ECC Independent Living Scheme.	H1.25	Information noted. It will be reviewed and used to inform/update the supporting text to policies H1 and H2, as appropriate.	Review information provided, and if appropriate update supporting text to policies H1 and H2.	
Would like to be able to build a self-build property and be	H1.26	The Council maintains a register of individuals or groups who would like to self build. A form needs to be completed to be added to the	None required.	DLPQQ/946

informed of any opportunities		register and this can be found on the Council's website: www.basildon.gov.uk/selfbuild .		
Support for policy H2.	H2.1	Support for policy noted	None required	DLP/709, DLP/2586, DLP/3055, DLP/20342,
EMPTY	H2.2			
EMPTY	H2.3			
The low level of provision of residential care does not seem to reflect the ageing population	H2.4	The level of provision for additional residential care provision is based on evidence of gross need identified in the South Essex SHMA 2016 compared to existing net provision. The level of provision is therefore justified by evidence.	None required	DLP/918, DLP/3053DLPQQ/182
The requirements in policy H2 reflect evidence held by ECC.	H2.5	Alignment of evidence with that held by ECC, as the adult social care provider, noted.	None required	DLP/2586
The requirement for dementia care places is under estimated.	H2.6	The level of provision for dementia places has been calculated using the nationally recognised Housing LIN tool. This work has been undertaken as part of the South Essex SHMA 2016. It should be noted that the representation submitted by ECC (summary H2.4) confirms that the findings of the SHMA align with their own calculations of future need. It is considered that this requirement has therefore been correctly identified, based on current best practice.	None required	DLP/802
Developer with interest in proposed allocation H13 has indicated the possibility of securing an elderly care facility within that proposed allocation.	H2.7	Potential for the provision of elderly care within proposed allocation H13 noted.	Consider the implications of this potential in assessing the deliverability of policy H2. If appropriate, amend policy H13 accordingly.	DLP/123
Consideration should be given to the provision of Care Farms as they offer therapeutic activity.	H2.8	The Council is not in receipt of any proposals for a Care Farm, and has not previously given consideration to such a proposal, or what it may entail. It is suggested that the Council contacts this consultee to seek further information on what is being suggested before any recommendation is made in respect of this proposition.	Contact consultee to identify what is being proposed, before giving further consideration to this proposal. It may be necessary to amend policy H2, or another aspect of the Local Plan, if this proposal is found to be suitable.	DLP/709, DLP/711, DLP/709,

Policy H2 should be clearer as to what is meant by larger development.	H2.9	Policy H33 sets out the requirement for on-site provision of specialist accommodation for older people, setting out relevant thresholds.	None required	DLP/4960
Developer with interest in proposed allocation H20 has indicated the possibility of securing an elderly care facility within that proposed allocation.	H2.10	Potential for the provision of elderly care within proposed allocation H20 noted.	Consider the implications of this potential in assessing the deliverability of policy H2. If appropriate, amend policy H20 accordingly.	DLP/1787, DLP/2818
The need for older peoples accommodation is additional to the overall need for housing	H2.11	Sheltered and extra care accommodation sites within use class C3 and is a component of overall housing need. The calculations in the SHMA are clear that this is the case as the Housing LIN toolkit uses the non-institutional resident population as its base. It is noted that there is an additional need for residential care provision falling within use class C2. This is an additional need and is recognised as such, as it is change in the institutional population that is used to generate calculation of this need. Policy H2 is considered to be clear in this respect.	None required.	DLP/4610
The plan is not clear on its strategy for older people's accommodation.	H2.12	Policy H2 sets out such requirements.	None required	DLPQQ/311
Observations regarding wording changes to paragraph 11.25, to remove statements about traveller history or ethnicity, which implies special treatment.	H3.1	The Council considers reference to the history and ethnicity of Gypsies and Travellers appropriate, in order to provide context to the circumstances that form the setting for the community, and in terms of which it can be understood. As with the borough wide context (see Chapter 3: Spatial Portrait), the historic thread of our environment is fundamental to understanding how society and landscape have developed over time.	None required.	DLP/139
There is no evidence to support that the majority of Gypsies and Travellers are self-employed.	H3.2	A detailed survey of the Gypsy and Traveller population in Basildon Borough (BBLNAA) provides information about the employment status of household members, by all household	None required, see BBLNAA 2013.	DLP/139

		members aged over 16 Years, amongst the Gypsy and Traveller community. This has been used to inform the Local Plan.		
The employment preference and status of travellers should not be prioritised as a reason for providing travellers' accommodation needs.	H3.3	The NPPF makes it clear that LPAs should plan positively to meet the development needs of the area. One of the NPPF's Core Planning Principles is to meet the objectively assessed need for housing (including accommodation for gypsies and travellers), business and other development needs of an area and respond positively to wider opportunities for growth. The methodology used to calculate accommodation need and future pitch and plot requirements has been developed over the past 10 years, and provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment which has been updated in light of Planning Policy for Traveller Sites 2015 (BBLNAA).	None required, see BBLNAA.	DLP/139
Observations regarding wording changes to paragraph 11.26, to remove statements about the legal status of Gypsies and Travellers.	H3.4	The Council considers reference to the legal status of Gypsies and Travellers appropriate, in order to provide context to the circumstances that form the setting for the community, and in terms of which it can be understood.	None required	DLP/140
The provision of permanent pitches is not required for a nomadic lifestyle.	H3.5	Policy B of the Planning Policy for Traveller Sites (PPTS) establishes that local planning authorities should set local pitch targets for gypsies and travellers and plot targets for travelling showpeople, including the likely permanent and transit site accommodation needs of travellers in their area.	None required.	DLP/377, DLP/2884 DLP/3487, DLPQQ/948
The Council should clarify whether it has been compliant in fulfilling its' legal obligations in respect of the Housing Act 2004.	H3.6	Noted. The Council will consider wording changes and will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	Consider wording changes.	DLP/141

<p>The need arising from the cleared plots at Dale Farm should be met within the borough.</p>	<p>H3.7</p>	<p>Taking a very similar approach to the appraisal of housing sites within the HELAA, the BBSPS (2015) has evaluated suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt, to be in the order of 98 and 109 pitches. With a requirement of 104 pitches arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites, and 136 additional pitches arising from the large scale unauthorised site at Dale Farm, there is demonstrably insufficient land available for that purpose.</p>	<p>None required.</p>	<p>DLP/28</p>
<p>The needs of families on the large scale unauthorised site at Dale Farm should not be treated differently to those of families living on other small scale unauthorised sites.</p>	<p>H3.8</p>	<p>Policy B at paragraph 12 makes specific reference to 'large-scale' unauthorised site that has significantly increased the need of an area. The BBLNAA identifies a requirement arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites of 104 pitches, while that arising from the large scale unauthorised site at Dale Farm is 136 additional pitches - an increase of over 100%. The Council considers this to be a significant increase of its need. Combining these with significant land constraints, the Council considers that there is reasonable justification to apply Policy B of the PPTS to the unauthorised site at Dale Farm.</p>	<p>None required.</p>	<p>DLP/28, DLP/32</p>
<p>Observations regarding wording changes to paragraph 11.35, to quote Policies C, D and E of the PPTS in order to enable consultees to make informed responses.</p>	<p>H3.9</p>	<p>Noted. The aim of the Local Plan is not to repeat policy matters that are adequately covered in the NPPF or other national policy. National Policy guidance advises that having the relevant policies all in one document is convenient for the public, but this is often negated by the production of a long, unfocused and confusing plan in which the essential issues and the</p>	<p>Consider wording changes.</p>	<p>DLP/142</p>

		strategies are lost in a mass of unnecessary material.		
Observations regarding wording changes to paragraph 11.36, to explain why the residential and business needs of travellers should be accommodated on the same site.	H3.10	Noted. The Council will consider wording changes and will keep this situation under review in the development of the Local Plan.	Consider wording changes.	DLP/144
Observations regarding wording changes to paragraph 11.36, to comment on issues relating to the lack integration between the traveller and settled communities, and the associated impacts.	H3.11	Noted. The Council will consider wording changes and will keep this situation under review in the development of the Local Plan.	Consider wording changes.	DLP/144
There is no evidence that the views and interests of either traveller or settled communities were sought or taken into account in drafting the Local Plan.	H3.12	The methodology for identifying the housing needs of Gypsies and Travellers adopted in the BBLNAA was largely based upon face to face interviews with Gypsies and Travellers across Basildon, using survey questionnaires with significant input from Gypsy and Traveller representative groups over time. The study also included extensive stakeholder engagement to help understand the current situation in the area. In addition, the consultation on the Draft Local Plan which ran from the 28 January to the 24 March 2016 sought the views of residents, businesses and other stakeholders on the Draft Local Plan, and any comments received at this time will be used to ensure that the most appropriate options have been selected for each policy area, and to identify any outstanding issues that need to be addressed before the plan is finalised for submission.	None required.	DLP/144, DLP/11577, DLP/11606, DLP/11634, DLPQQ/845, DLPQQ/859, DLPQQ/564, DLPQQ/767, DLPQQ/949

<p>The proposed gypsy/traveller site in Oak Lane and Hovefields is unsuitable due to dangerous/poor access.</p>	<p>H3.13</p>	<p>In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. The Council has also prepared an Infrastructure Delivery Plan that determines what infrastructure is required to support the development proposed in the Local Plan. The Infrastructure Delivery Plan will be updated as the plan moves through its preparation to adoption, to ensure that the appropriate infrastructure is put in place to support development.</p>	<p>Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.</p>	<p>DLP/144</p>
<p>Dale Farm and Oak Lane should not be identified in the plan as Gypsy and Traveller sites but should be allocated for housing development.</p>	<p>H3.14</p>	<p>Noted. The site allocations within the Draft Local Plan have been identified as the most appropriate locations for development based on the findings of a range of studies taking into account infrastructure provision, the supply of suitable and deliverable sites and environmental and historic constraints. The Council will consider reviewing the evidence which led to the allocation of additional pitches for Gypsies and Travellers.</p>	<p>Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.</p>	<p>DLP/699, DLP/700, DLP/702, DLP/2853, DLP/2849, DLP/546, DLP/707</p>
<p>There is no mention of the illegal pitches on Oak Lane, Crays Hill.</p>	<p>H3.15</p>	<p>The BBLNAA contains information on the location of all known sites in the Borough, and the number of pitches or plots on each one.</p>	<p>None required. See Appendix A of the BBLNAA.</p>	<p>DLP/143</p>

<p>The number of pitches projected to accommodate families displaced from the unauthorised site at Dale Farm is excessive.</p>	<p>H3.16</p>	<p>Noted. The Council will consider reviewing the evidence base in light of comments received.</p>	<p>Consider reviewing evidence base.</p>	<p>DLP/372, DLP/1413, DLP/1940, DLP/2098, DLP/2108, DLP/2690, DLP/2868, DLP/3107, DLP/3128, DLP/3149, DLP/3156, DLP/3117, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451,</p>
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				DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735,
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				DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/10191,
Updates to the PPTS in relation to large-scale unauthorised sites and special planning constraints should apply to Dale Farm.	H3.17	Policy H3 make appropriate reference to the PPTS 2015 update which establishes what is expected of local planning authorities that are burdened by large-scale unauthorised sites that have significantly increased their need.	None required.	DLP/372
There is no need to make special provision for travellers and gypsies who have no intention to continue a nomadic lifestyle.	H3.18	As a consequence of the changes to definition of gypsies and travellers in the 2015 update to the PPTS which requires gypsies and travellers, for planning purposes, to demonstrate a nomadic lifestyle, additional interviews were commissioned to update the BBLNAA in October 2015. The purpose of this work is to identify those gypsies and travellers which should be planned for in accordance with the PPTS, as they retain a nomadic lifestyle, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Childrens and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a nomadic lifestyle and where the PPTS does not apply. This work is ongoing, but is not likely to alter the overall assessment of need, but rather, how it is met through different sites in this plan.	The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	DLP/372DLPQQ/736

<p>There are no special circumstances to justify the additional Traveller pitches being proposed on Green Belt.</p>	<p>H3.19</p>	<p>Paragraph 83 of the NPPF allows for Green Belt boundaries to be amended through the preparation and/or review of a Local Plan in exceptional circumstances. Previous SA/SEA work to inform the Core Strategy Preferred Options Report 2012 indicated that an approach which excludes development on land within the current extent of the Green Belt would have negative consequences for the social and economic aspects of sustainable development, and consequently such as approach would not be sustainable in itself. The Council therefore undertook a review of the Green Belt in 2013 and updated this in 2015 to enable the identification of sites where development can be accommodated, whilst maintaining the overall purpose of the Borough's Green Belt. Therefore, the combination of need for pitches and plots, the lack of available and suitable sites in non-Green Belt locations and the specific identification of sites that are suitable in landscape and Green Belt purposes constitute the special circumstances required to allow development of sites for Gypsy, Traveller and Travelling Showpeople use in the Green Belt.</p>	<p>None required. See Policy SD 1.</p>	<p>DLP/418</p>
<p>Gypsy and traveller pitches should be provided alongside strategic housing schemes in the future.</p>	<p>H3.20</p>	<p>In addition to securing a new site to accommodate additional pitches alongside new housing provision within H 13, criterion 1(e) of Policy H 3 states that from 2020 onwards, the Council will determine on a case by case basis, whether any unmet need for gypsy and traveller pitches and/or park home pitches can be catered for on other strategic sized sites identified within policies H9 to H27 of the plan, having regard to market conditions and development viability at the time of submission of a planning application.</p>	<p>None required.</p>	<p>DLP/29, DLP/146, DLP/2849</p>

<p>Why has the council first considered urban areas in meeting gypsy and traveller accommodation needs?</p>	<p>H3.21</p>	<p>It is recognised that there are differences in the way that the settled community and gypsies and travellers go about their day-to-day activities, and make use of places in which they live. Nonetheless, the Council has a responsibility to make provision for the accommodation needs of both communities. Therefore, a careful balance must be struck which ensure that the Council does not exclude gypsies and travellers, or indeed any other group with a protected characteristic, from playing part in the community of Basildon, whilst also ensuring that the needs of the community as a whole are met. Ultimately, it may be the case that if residents are concerned about the conflicts that may arise from gypsies and travellers being in close proximity to the settlement community, that sites within the Green Belt, which are normally more favoured by gypsies and travellers in any event, are considered more favourably within the Local Plan in meeting the needs of gypsies and travellers. This will enable the proximity issues to be overcome.</p>	<p>Give consideration to an approach in meeting the accommodation needs of gypsies and travellers which overcomes the proximity issues raised by allowing for the provision of sites within the current extent of the Green Belt.</p>	<p>DLP/145</p>
<p>The number of pitches on a site should not be restricted to 15.</p>	<p>H3.22</p>	<p>National policy suggests that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family, rather than large sites. Government guidance suggests that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. The number of pitches identified for the accommodation of pitches for gypsies and travellers on each site is based on the outcomes of the Site Potential Study.</p>	<p>None required.</p>	<p>DLP/30, DLP/42</p>

What are the implications of providing traveller pitches on each strategic housing site, on individual site densities and development viability?	H3.23	The Whole Plan Viability Assessment (2015) shows that providing pitches upon strategic sites would make development on these sites marginal in terms of viability, and would consequently put at risk the delivery of housing generally. In addition, Policy H 3 makes provision to determine such implications on a case by case basis from 2020 onwards, having regard to market conditions and development viability at the time of submission of a planning application.	None required.	DLP/146
What is the credibility of the conclusions reached in paragraph 11.44.	H3.24	Many of the evidence bases have been prepared independently by consultants and experts in their specific fields. A schedule of the evidence that has been collected to inform the Draft Local Plan is included at Appendix 1.	None required.	DLP/146
There is no requirement by the government to guarantee long term financial viability and by implication, development viability is outside the Council's competence and should only be addressed after development sites have been agreed in principle.	H3.25	Paragraph 173 of the NPPF states that sustainable development requires careful attention to viability and costs in both plan-making and decision-taking, and that plans should be deliverable. The Whole Plan Viability Assessment (2015) evidences that the requirements of the NPPF are met.	None required.	DLP/146
The council has limited traveller sites to very few areas.	H3.26	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	Consider reviewing evidence.	DLP/146DLPQQ/961
Existing traveller sites should not be allowed to expand	H3.27	The BBSPS identified and assessed a number of sites which it considered to be potentially	Consider reviewing evidence.	DLP/154, DLP/292, DLP/379, DLP/8844,

further, but also limited to 15 pitches.		suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.		
Support paragraph 11.45.	H3.28	Support noted.	None required.	DLP/31
The Council cannot depend on plotlands to meet gypsy and traveller needs because they have not been promoted for such purpose.	H3.29	Noted. The Council will consider updating the evidence base in light of comments received.	Consider updating evidence base.	DLP/147
Observations regarding wording changes to paragraphs 11.46 and 11.47 to clarify that the Council has no obligation to make provision for the need arising from the unauthorised site formerly located at Dale Farm.	H3.30	Noted. The Council will consider wording changes and will keep this situation under review in the development of the Local Plan.	Consider wording changes.	DLP/181, DLP/180
Transit Sites should be provided.	H3.31	Noted. The BBSPS concluded that there is no suitable and available site for the purpose of transit sites, and that this need will have to be addressed through the Duty to Cooperate. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	Consider reviewing evidence.	DLP/9 DLP/33, DLP/36, DLP/461, DLP/1319, DLP/1400, DLP/1609, DLP/1918, DLP/2815, DLP/2835, DLP/2849, DLP/2954, DLP/4723, DLP/8470, DLP/8496, DLP/8506, DLP/8522, DLP/8529, DLP/8530, DLP/8546, DLP/8548, DLP/8554, DLP/8560, DLP/8563, DLP/8570, DLP/8575, DLP/8581, DLP/8586, DLP/8590, DLP/8598, DLP/8604, DLP/8609, DLP/8616, DLP/8637, DLP/8641, DLP/8646, DLP/8656, DLP/8665, DLP/8675, DLP/8677, DLP/8695, DLP/8699, DLP/8704, DLP/8713, DLP/8715, DLP/8722, DLP/8730, DLP/8733, DLP/8737, DLP/8746, DLP/8752, DLP/8757, DLP/8764, DLP/8771, DLP/8776,

				DLP/8784, DLP/8791, DLP/8802, DLP/8803, DLP/8807, DLP/8815, DLP/8820, DLP/8827, DLP/8831, DLP/8837, DLP/8844, DLP/8848, DLP/8853, DLP/8856, DLP/8867, DLP/8873, DLP/8878, DLP/8887, DLP/8890, DLP/8895, DLP/8904, DLP/8907, DLP/8912, DLP/8917, DLP/8924, DLP/8929, DLP/8934, DLP/8940, DLP/8950, DLP/8952, DLP/8959, DLP/8965, DLP/8969, DLP/8978, DLP/8983, DLP/8988, DLP/8997, DLP/9003, DLP/9009, DLP/9019, DLP/9025, DLP/9032, DLP/9041, DLP/9046, DLP/9047, DLP/9055, DLP/9060, DLP/9065, DLP/9072, DLP/9078, DLP/9085, DLP/9091, DLP/9097, DLP/9106, DLP/9108, DLP/9114, DLP/9120, DLP/9125, DLP/9133, DLP/9134, DLP/9144, DLP/9145, DLP/9153, DLP/9161, DLP/9164, DLP/9170, DLP/9178, DLP/9184, DLP/9188, DLP/9193, DLP/9204, DLP/9218, DLP/9231, DLP/9234, DLP/9242, DLP/9255, DLP/9264, DLP/9265, DLP/9276, DLP/9281, DLP/9286, DLP/9292, DLP/9297, DLP/9303, DLP/9313, DLP/9323, DLP/9331, DLP/9341, DLP/9347, DLP/9348, DLP/9356, DLP/9361, DLP/9368, DLP/9372, DLP/9378, DLP/9384, DLP/9387, DLP/9394, DLP/9399, DLP/9405, DLP/9410, DLP/9416, DLP/9424, DLP/9427, DLP/9434, DLP/9440, DLP/9447, DLP/9455, DLP/9465, DLP/9476, DLP/9480, DLP/9489, DLP/9493, DLP/9500,
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Greater Essex Authorities are not doing enough to address unmet gypsy, traveller and travelling showpeople needs.	H3.32	Noted. There has and continues to be ongoing dialogue, meetings and discussions with neighbouring, Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	The Council will continue to seek proactive cooperation with other Greater Essex authorities at a Member and Officer level before the plan is finalised.	DLP/34, DLP/20276,
Neighbouring authorities are unlikely to provide traveller sites for unmet needs.	H3.33	Noted. There has and continues to be ongoing dialogue, meetings and discussions with neighbouring, Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	The Council will continue to seek proactive cooperation with other Greater Essex authorities at a Member and Officer level before the plan is finalised.	DLP/35, DLP/1588, DLP/2849, DLP/20238,
The number of pitches proposed is insufficient.	H3.34	The BBLNAA identifies a requirement arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites of 104 pitches, while that arising from the large scale unauthorised site at Dale Farm is 136 additional pitches. The Council considers the need arising from the unauthorised site at Dale Farm to be a significant increase of its need, with demonstrably insufficient land available for that	None required.	DLP/36DLPQQ/485

		purpose. This need will therefore need to be met through the Duty to Cooperate.		
There should be one policy to summarise the types and locations of proposed pitches.	H3.35	New Gypsy and Traveller Site provision are identified on the Proposals Map, and in Appendix 4. The Council will consider updating Policy H 6, New Gypsy and Traveller Site Provision in light of comments received.	Consider updating Policy H 6.	DLP/36
Support Policy H 3, Criterion 1(a).	H3.36	Support noted.	None required.	DLP/36
Observations regarding wording changes to Policy H 3, Criterion 1(b) to change policy 'H4' to 'H6'.	H3.37	Noted, the Council will consider wording changes.	Consider wording changes.	DLP/36
There is no 'allocation policy' to identify the specific locations of park homes sites for non-travelling gypsies and travellers.	H3.38	Noted, the Council will consider including a separate allocation policy for park homes sites.	Consider a separate allocation policy for park homes sites.	DLP/36
The number of pitches on H 13 should not be restricted to 15 if there is capacity for more.	H3.39	The number of pitches identified for the accommodation of pitches for gypsies and travellers on this site is based on the outcomes of the Site Potential Study.	None required.	DLP/36
No reference has been made in Policy H 3 referring to the proposed allocation for travellers on H10.	H3.40	A decision was taken to not make provision for the need arising from the large unauthorised encampment that previously occupied the Dale Farm site. As a consequence of the overall requirement reducing, the need to secure new provision on large sites such as H10 diminished. This decision was taken later in the day, and whilst the requirement was removed from policy H10, the reference was not removed from the supporting text. Assuming the Council's position in this regard remains unchanged, paragraph 11.89 will need amending to remove this requirement.	If the Council's position regarding the provision of accommodation of gypsies and travellers remains unchanged, update paragraph 11.89 to remove cross reference to policy H3.	DLP/36
Criterion 1(d) conflicts with paragraph 11.43.	H3.41	While paragraph 11.43 does state that providing pitches upon strategic sites would make	None required.	DLP/36

		development on these sites marginal in terms of viability, paragraph 11.44 makes reference to the use of Council assets on site H 13 to secure 15 additional pitches in order to overcome some of the viability issues associated with securing pitches alongside traditional housing provision on strategic sites.		
The Council should not wait until 2020 before securing additional pitches when immediate needs have not been met.	H3.42	Noted. The overall capacity for new gypsy and traveller site provision is 72 pitches, of which 49 are available within five years, and 23 are available beyond 2018. In line with the NPPF, Policy H 3 under Criterion 1 (e) seeks a more flexible approach to the sites coming forward from year 6 onwards, recognising the impact of economic cycles and variations in values and policy changes over time. While sites H9 to H27 might not be viable now, they might instead only become viable at a future point in time.	None required.	DLP/36
Policy H 3, Criterion 2 offers no certainty in addressing immediate needs.	H3.43	Noted. There has and continues to be ongoing dialogue, meetings and discussions with neighbouring, Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	The Council will continue to seek proactive cooperation with other Greater Essex authorities at a Member and Officer level before the plan is finalised.	DLP/36
Observations regarding wording changes to Policy H 3, Criterion 3 to also make reference to policy H 32.	H3.44	Noted, the Council will consider wording changes.	Consider wording changes.	DLP/36
Most of the proposed allocations are on private sites which the Council has little or no control over.	H3.45	The Council is aware that the majority of Gypsy and Traveller sites in the borough are privately owned, and as recommended by the BBSPS (2015), would continue to investigate delivery options, in partnership with the Registered Providers and other delivery partners.	Consider whether further detail could be given in Policy H 3 relating to the delivery and management of Gypsy and Traveller sites.	DLP/36

There in no new social provision for gypsy and traveller accommodation.	H3.46	Planning Policy for Traveller Sites does not require local authorities to split their needs into market and affordable provision in the same way that the National Planning Policy Framework requires for housing. Instead, local authorities must have a 5 year land supply to meet their needs. Therefore, Basildon Borough are not constrained in their delivery to a set mix of public and private provision. Many Gypsy and Traveller sites are in private hands, but accommodate households in need through housing benefit support and therefore are effectively providing for affordable housing needs. The ability of local authorities to meet their 5 year land supply depends heavily upon their own and other public bodies land ownership in their area, the ability of the Gypsy and Traveller community to bring sites forward and also the willingness of other developers to release land for new sites.	None required. See BBLNAA and BBSPS.	DLP/36
Brentwood Borough Council is unable to meet the gypsy and traveller needs of other boroughs because of Green Belt restrictions.	H3.47	Noted.	The Council will continue to work with Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople.	DLP/2051
Uttlesford District Council does not have an overprovision of sites to assist Basildon in meeting its gypsy and traveller needs.	H3.48	Noted.	The Council will continue to work with Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople.	DLP/708
Is there any evidence to support the proposition that some of Basildon's unmet needs can be met in Uttlesford?	H3.49	The Council has engaged formally and informally at officer and some member levels in meeting the needs for gypsy, traveller and travelling showpeople in Greater Essex; which it regards as being a strategic, cross boundary matter. The focus on this engagement until now has been through formal responses to Local	The Council will continue to work with Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople.	DLP/708

		Plan or Spatial Development Strategy consultations, whilst evidence to establish need and determine potential site supply for Basildon Borough has been underway. This has included formal consultation responses setting out that those authorities should be mindful that the findings of, and updates to evidence bases relating to gypsy, traveller and travelling showpeople accommodation could mean they will be asked to meet provision from outside their administrative area.		
Neighbouring authorities should take more gypsy and traveller accommodation needs.	H3.50	Noted. The NPPF makes it clear that LPAs should plan positively to meet the development needs of the area, including accommodation for gypsies and travellers. The BBSPS (2015) has evaluated suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt. Where the Borough has not been able to accommodate its development needs, then under the Duty to Co-operate, as set out in the Localism Act 2011, the Council have asked neighbouring authorities to assist in helping meet the Borough's need. There has and continues to be ongoing dialogue, meetings and discussions with neighbouring, Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople.	The Council will continue to seek proactive cooperation with other Greater Essex authorities at a Member and Officer level before the plan is finalised.	DLP/165, DLP/823 DLP/841, DLP/1062, DLP/1207, DLP/1315, DLP/2388, DLP/3063, DLP/4510, DLPQQ/72, DLPQQ/73, DLPQQ/468, DLPQQ/569
There seems to be an overprovision for sites within the plan in light of new guidance.	H3.51	The methodology used to calculate accommodation need and future pitch and plot requirements has been developed over the past 10 years, and provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment which has been updated in light of Planning Policy for Traveller Sites 2015 (BBLNAA).	The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	DLP/841, DLP/1286 DLPQQ/106, DLPQQ/234

<p>How will the Council prevent/control unauthorised expansion of gypsy/traveller sites and illegal pitches?</p>	<p>H3.52</p>	<p>By working in partnership with relevant stakeholders to make provision for gypsy and traveller accommodation needs not just in Basildon, but in the wider Essex area, the Council expects to prevent issues that may be associated with under provision, illegal pitches and unauthorised development. Conditions can also be put on planning applications, which can be enforced if they are not being complied with.</p>	<p>Consider whether further detail could be given in Policy H 3 relating to the prevention of unauthorised sites.</p>	<p>DLP/138, DLP/823, DLP/976, DLP/1230, DLP/1315, DLP/1413, DLP/1940, DLP/2098, DLP/2108, DLP/2268, DLP/2288, DLP/2690, DLP/2868, DLP/3089, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3881, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310,</p>
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			DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655,
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				DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5746, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/10191, DLPQQ/665
Wickford already has too many gypsy and traveller sites, and should not be taking more.	H3.53	Noted. The site allocations within the Draft Local Plan have been identified as the most appropriate locations for development based on the findings of a range of studies taking into account infrastructure provision, the supply of suitable and deliverable sites and environmental and historic constraints. Pitches are not proposed in locations where the Council does not have a land interest, and where pitches are not being proposed by private landowners, as it is not considered possible to deliver pitches in such instances and the approach to pitch provision in the local plan would not therefore be effective.	None required.	DLP/160, DLP/360, DLP/976, DLP/1070, DLP/1072, DLP/1207, DLP/1319, DLP/1413, DLP/1718, DLP/1940, DLP/2098, DLP/2108, DLP/2187, DLP/2385, DLP/2415, DLP/2690, DLP/2868, DLP/2884, DLP/3063, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3502, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816,

				DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172,
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				DLP/5181, DLP/5422, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/7024, DLP/8669, DLP/8690, DLP/8898, DLP/9052, DLP/9470, DLP/9485, DLP/10052, DLP/10191, DLP/13035, DLP/20656, DP/20096, DLPQQ/58, DLPQQ/59, DLPQQ/67, DLPQQ/682, DLPQQ/664, DLPQQ/961
Object to the proposed expansion of gypsy and traveller sites in Hovefields due to its scale/impact.	H3.54	The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their full objectively assessed need. The Borough's full objectively assessed need is for 15,260 homes, 49ha of employment land and 240 Gypsy and Traveller pitches. In	Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.	DLP/420, DLP/1145, DLP/1546, DLP/2360, DLP/2380, DLP/5033, DLP/8030, DLP/8031, DLP/8035, DLP/8210, DLP/8211, DLP/8725, DLP/9249, DLP/16820,

		line with the NPPF, the Council must demonstrate that this need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact.		DLP/16879DLPQQ/281, DLPQQ/959
Proposed expansion of gypsy and traveller sites in Hovefields will have a detrimental impact on the environment, in terms of flood risk/air quality/noise/pollution e.tc.	H3.55	In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. The Council has also prepared an Infrastructure Delivery Plan that determines what infrastructure is required to support the development proposed in the Local Plan. The Infrastructure Delivery Plan will be updated as the plan moves through its preparation to adoption, to ensure that the appropriate infrastructure is put in place to support development.	The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	DLP/1145, DLP/1242, DLP/2360, DLP/2853, DLP/5033

<p>Why is the Council providing more pitches for Travellers when it cost the Council to remove them from Dale Farm?</p>	<p>H3.56</p>	<p>The NPPF makes it clear that LPAs should plan positively to meet the development needs of the area, with sufficient flexibility to adapt to rapid change. One of the NPPF's Core Planning Principles is to meet the objectively assessed need for housing, business and other development needs of an area and respond positively to wider opportunities for growth. In respect of Dale Farm, planning breaches first came to the Council's notice in 2001. After service of the appropriate notices, the First Secretary of State dismissed various appeals but extended the compliance period by two years. During this time the number of caravans on the site increased significantly, rather than decreased. After that a number of high court decisions brought the legal challenge on planning grounds to a close. Since this time the Council had, alongside planning and preparing for the site clearances here and elsewhere in the Borough, sought to find a means by which the travellers could leave the site, without the need for a forced eviction. However, this was not possible.</p>	<p>None required.</p>	<p>DLP/292, DLP/1070, DLP/1072, DLP/1145, DLP/1286, DLP/1413, DLP/1454, DLP/1546, DLP/1794, DLP/1801, DLP/1932, DLP/1940, DLP/2098, DLP/2108, DLP/2268, DLP/2288, DLP/2380, DLP/2385, DLP/2415, DLP/2690, DLP/2868, DLP/2884, DLP/2990, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3502, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3881, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207,</p>
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				DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5123, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558,
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				DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/10191, DLPQQ/59, DLPQQ/392, DLPQQ/707
The Draft Local Plan omits some existing traveller pitches locally known as Gypsy Hill.	H3.57	Noted. The Council will consider reviewing the evidence in light of comments received.	Consider reviewing evidence.	DLP/1145, DLP/1146, DLP/1546, DLP/2360, DLP/2380, DLP/5033
Object to the proposed expansion of gypsy and traveller sites in Oak Lane due to its scale/impact.	H3.58	The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their full objectively assessed need. The Borough's full objectively assessed need is for 15,260 homes, 49ha of employment land and 240 Gypsy and Traveller pitches. In line with the NPPF, the Council must demonstrate that this need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact.	Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.	DLP/1350, DLP/1426, DLP/1427, DLP/2388, DLP/3881, DLP/420, DLP/1454, DLP/1740, DLP/1523, DLP/1794, DLP/1801, DLP/3089, DLP/347, DLP/97, DLP/99, DLP/347, DLP/349, DLP/7198, DLP/7203, DLP/7208, DLP/7209, DLP/7317, DLP/7336, DLP/7105, DLP/7101, DLP/7091, DLP/7305DLPQQ/996

<p>There is inadequate infrastructure to cope with the increase in traveller pitches.</p>	<p>H3.59</p>	<p>In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. The Council has also prepared an Infrastructure Delivery Plan that determines what infrastructure is required to support the development proposed in the Local Plan. The Infrastructure Delivery Plan will be updated as the plan moves through its preparation to adoption, to ensure that the appropriate infrastructure is put in place to support development.</p>	<p>Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.</p>	<p>DLP/1319, DLP/1413, DLP/1546, DLP/1718, DLP/1932, DLP/2380, DLP/2690, DLP/2853, DLP/2868, DLP/3089, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390,</p>
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				DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4939, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5033, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692,
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				DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/8742, DLP/8781, DLP/8785, DLP/8931, DLP/8964, DLP/10191, DLP/20267, DLP/20269, DLP/8785
Proposals conflict with Policies of the PPTS in terms of green belt development, open countryside and proximity to existing developments.	H3.60	Noted. The site allocations within the Draft Local Plan have been identified as the most appropriate locations for development based on the findings of a range of studies taking into account infrastructure provision, the supply of suitable and deliverable sites and environmental and historic constraints. The Council will consider reviewing the evidence which led to the allocation of additional pitches for Gypsies and Travellers.	Consider reviewing evidence base.	DLP/1413, DLP/1940, DLP/2098, DLP/2108, DLP/2690, DLP/2868, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061,

				DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404,
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Concerns about the loss of open space and recreational facilities.	H3.61	Chapter 13 addresses the Borough's leisure and recreation facilities. Where a loss would occur through new development, the Council would encourage the existing use to be offset elsewhere within the Borough.	None required, see chapter 13.	DLP/1413, DLP/2690, DLP/2821, DLP/2868, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893,

				DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244,
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				DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/8708, DLP/10191, DLPQQ/928
The proposals discriminate against/violate the rights of the settled community.	H3.62	Noted. The site allocations within the Draft Local Plan have been identified as the most appropriate locations for development based on the findings of a range of studies taking into account infrastructure provision, the supply of suitable and deliverable sites and environmental and historic constraints. The Council will consider reviewing the evidence which led to the allocation of additional pitches for Gypsies and Travellers.	Consider reviewing evidence base.	DLP/1319, DLP/1400, DLP/1413, DLP/1609, DLP/1918, DLP/1940, DLP/2098, DLP/2108, DLP/2415, DLP/2690, DLP/2815, DLP/2835, DLP/2868, DLP/2884, DLP/2954, DLP/2954, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3502, DLP/3503, DLP/3511, DLP/3522, DLP/3533,

				DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4723, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866,
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				DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/7024, DLP/8470, DLP/8496, DLP/8506, DLP/8522, DLP/8529, DLP/8530, DLP/8546, DLP/8548, DLP/8554, DLP/8560, DLP/8563, DLP/8575, DLP/8581, DLP/8586, DLP/8590, DLP/8598, DLP/8604, DLP/8609, DLP/8616,
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				DLP/9368, DLP/9372, DLP/9378, DLP/9384, DLP/9387, DLP/9394, DLP/9399, DLP/9405, DLP/9410, DLP/9416, DLP/9424, DLP/9427, DLP/9434, DLP/9440, DLP/9447, DLP/9455, DLP/9461, DLP/9465, DLP/9476, DLP/9480, DLP/9489, DLP/9493, DLP/9500, DLP/9501, DLP/9513, DLP/9519, DLP/9527, DLP/9535, DLP/9543, DLP/9551, DLP/9557, DLP/9563, DLP/9564, DLP/9571, DLP/9572, DLP/9590, DLP/9591, DLP/10191, DLP/16762, DLP/16765, DLP/16797, DLP/16800, DLP/16859, DLP/16863, DLP/16914, DLP/1413, DLP/16915, DLP/1319, DLP/16915, DLP/9556, DLPQQ/67, DLPQQ/225, DLPQQ/227, DLPQQ/378
The proposals will devalue existing properties as a result of close proximity to traveller sites.	H3.63	Noted. However, this is not a valid planning consideration that the Council can take into account when developing its Local Plan.	None required.	DLP/160, DLP/1207, DLP/1413, DLP/1932, DLP/1940, DLP/2098, DLP/2108, DLP/2415, DLP/2690, DLP/2821, DLP/2853, DLP/2868, DLP/2884, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3487, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636,

				DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008,
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				DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350, DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/10191, DLPQQ/59, DLPQQ/144, DLPQQ/225, DLPQQ/227, DLPQQ/608
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<p>Council income via council taxes will reduce because houses will be near traveller sites.</p>	<p>H3.64</p>	<p>Noted. However, this is not a valid planning consideration that the Council can take into account when developing its Local Plan.</p>	<p>None required.</p>	<p>DLP/1413, DLP/1940, DLP/2098, DLP/2108, DLP/2690, DLP/2868, DLP/3128, DLP/3149, DLP/3156, DLP/3117, DLP/3328, DLP/3300, DLP/3283, DLP/3265, DLP/3243, DLP/3221, DLP/3232, DLP/3207, DLP/3188, DLP/3392, DLP/3410, DLP/3429, DLP/3468, DLP/3503, DLP/3511, DLP/3490, DLP/3471, DLP/3426, DLP/3403, DLP/3383, DLP/3452, DLP/3691, DLP/4293, DLP/3522, DLP/3543, DLP/3589, DLP/3603, DLP/3621, DLP/3674, DLP/3615, DLP/3651, DLP/3673, DLP/3554, DLP/3636, DLP/3590, DLP/3567, DLP/3533, DLP/3826, DLP/3720, DLP/3710, DLP/3840, DLP/3816, DLP/3750, DLP/3763, DLP/3783, DLP/3774, DLP/3837, DLP/3792, DLP/3738, DLP/3729, DLP/3699, DLP/4003, DLP/3959, DLP/3854, DLP/3878, DLP/3893, DLP/3919, DLP/3939, DLP/3975, DLP/3869, DLP/3900, DLP/3928, DLP/3911, DLP/3968, DLP/3986, DLP/4123, DLP/4025, DLP/4096, DLP/4048, DLP/4115, DLP/4014, DLP/4029, DLP/4044, DLP/4061, DLP/4084, DLP/4100, DLP/4128, DLP/4270, DLP/4283, DLP/4295, DLP/4243, DLP/4150, DLP/4179, DLP/4198, DLP/4207, DLP/4145, DLP/4281, DLP/4310, DLP/4161, DLP/4170, DLP/4188, DLP/4372, DLP/4234, DLP/4349, DLP/4247, DLP/4262, DLP/4563, DLP/4617, DLP/4606, DLP/4502,</p>
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				DLP/4584, DLP/4390, DLP/4451, DLP/4467, DLP/4327, DLP/4404, DLP/4383, DLP/4364, DLP/4555, DLP/4548, DLP/4570, DLP/4632, DLP/4673, DLP/4641, DLP/4651, DLP/4664, DLP/4765, DLP/4791, DLP/4527, DLP/4479, DLP/4488, DLP/4537, DLP/4919, DLP/4903, DLP/4883, DLP/4833, DLP/4858, DLP/4932, DLP/4981, DLP/4741, DLP/4876, DLP/4866, DLP/4799, DLP/4739, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4763, DLP/5094, DLP/4999, DLP/5060, DLP/5051, DLP/5042, DLP/5026, DLP/5017, DLP/5112, DLP/4839, DLP/4728, DLP/4914, DLP/5235, DLP/5226, DLP/5217, DLP/5208, DLP/5126, DLP/5092, DLP/5073, DLP/5162, DLP/5144, DLP/5135, DLP/5199, DLP/5190, DLP/4990, DLP/5395, DLP/5386, DLP/5377, DLP/5368, DLP/5359, DLP/5350, DLP/5341, DLP/5332, DLP/5323, DLP/5298, DLP/5244, DLP/5271, DLP/5262, DLP/5253, DLP/5181, DLP/5171, DLP/5172, DLP/5422, DLP/5413, DLP/5404, DLP/5492, DLP/5483, DLP/5474, DLP/5431, DLP/5511, DLP/5519, DLP/5280, DLP/5528, DLP/5501, DLP/5540, DLP/5574, DLP/5646, DLP/5637, DLP/5610, DLP/5601, DLP/5592, DLP/5682, DLP/5673, DLP/5664, DLP/5655, DLP/5692, DLP/5707, DLP/5583, DLP/5628, DLP/5619, DLP/5566, DLP/5549, DLP/5558, DLP/5857, DLP/5726, DLP/5717,
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The growth of traveller sites within the Green belt contradicts the treatment plotlands.	H3.65	The BBSPS evaluated whether there are suitable and available locations or specific land parcels available to meet the need for gypsy and traveller accommodation provision within the Borough. The Study identified and assessed a number of sites which it considered to be potentially suitable for new/additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. Based on this study, the Council allocated suitable sites for gypsy and traveller pitches and these are identified separately on the Policies Map and under Policy H6. It is recognised that there is potential for some additional supply to come forward in the plotlands subject to specific criteria, and this may allow for some existing local gypsy and traveller families to meet the needs of their growing families in these locations, albeit limited and uncertain. Policy GB3 would be applied when proposals for development within the extent of Plotlands are considered.	None required.	DLP/1350, DLP/7396,

Additional pitches should be placed elsewhere in the Borough.	H3.66	In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. The Council has also prepared an Infrastructure Delivery Plan that determines what infrastructure is required to support the development proposed in the Local Plan. The Infrastructure Delivery Plan will be updated as the plan moves through its preparation to adoption, to ensure that the appropriate infrastructure is put in place to support development.	Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.	DLP/1426, DLP/1427, DLP/1454, DLP/1523, DLP/1718, DLP/1740, DLP/9030, DLP/9174, DLP/9529
The plan does not make adequate provision for meeting the needs of gypsies and travellers.	H3.67	Policy H 3 states that 'the Council will seek to provide for the accommodation and well-being needs of the Borough's gypsy, traveller and travelling showpeople communities by securing existing provision and seeking the delivery of an additional 104 pitches', being the need arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites. The Council considers the 136 additional pitches arising from the large scale unauthorised site at Dale Farm to be a significant increase of its need, and therefore, a reasonable justification to apply Policy B of the PPTS to the unauthorised site at Dale Farm.	None required.	DLP/1588, DLP/2051
The plan does not say how it will deal with planning applications for gypsy sites.	H3.68	Policy H 31 sets out the development management criteria applicable when considering the new or expanding gypsy, traveller or travelling showpeople sites.	None required. See Policy H 31.	DLP/1588

Object to the Council providing more gypsy and traveller pitches because Basildon already has more sites than neighbouring authorities.	H3.69	The Council has a legal obligation to provide for the Borough's development needs and has a responsibility to provide for growth in line with the Government's growth agenda. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their objectively assessed need. The Borough's objectively assessed need includes 104 Gypsy and Traveller pitches, with 136 additional pitches from the large scale unauthorised site at Dale Farm. In line with the NPPF, the Council has used its evidence base to distribute the development in sites that are deliverable and can meet the objectively assessed need of the Borough.	None required. See BBLNAA and BBSPS.	DLP/1749, DLP/3179, DLP/7206, DLP/7056, DLPQQ/144, DLPQQ/360, DLPQQ/378, DLPQQ/878, DLPQQ/505, DLPQQ/569
Gypsies and travellers are been given special/preferential treatment.	H3.70	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt. The methodology used to calculate accommodation need and future pitch and plot requirements has been developed over the past 10 years, and provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment which has been updated in light of Planning Policy for Traveller Sites 2015 (BBLNAA).	None required. See BBLNAA and BBSPS.	DLP/1546, DLP/1579, DLP/2380, DLP/2380, DLP/4004, DLP/292, DLP/2581, DLP/2579, DLP/2580, DLP/8844DLPQQ/194
Why is H 13 the only strategic site identified for providing gypsy and traveller pitches?	H3.71	The Whole Plan Viability Assessment (2015) shows that providing pitches upon strategic sites would make development on these sites marginal in terms of viability, and would consequently put at risk the delivery of housing generally. In order to overcome this issue, consideration has been given to whether the Council can use its assets to improve the	None required.	DLP/2086

		viability of provision on those sites identified in policies H9 to H27. It however only has land interests in one site – H 13.		
The Council has not tested all the available options to accommodate the gypsy and traveller pitches within the Borough.	H3.72	Noted. The Council will consider updating the evidence base in light of comments received.	Consider updating evidence base.	DLP/2086
The level of engagement and consultation with neighbouring authorities under Duty to Cooperate has not been sufficient on gypsy, travellers and travelling showpeople provision.	H3.73	Noted. There has and continues to be ongoing dialogue, meetings and discussions with neighbouring, Greater Essex authorities on the unmet accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	The Council will continue to seek proactive cooperation with other Greater Essex authorities at a Member and Officer level before the plan is finalised.	DLP/2086
Local authorities in Essex should assess the needs and requirements of Gypsies/Travellers/Travelling Showpeople in the preparation of their local plans.	H3.74	Noted. The Council can only control what happens in their administrative area and the Council has a statutory duty to provide for the Borough's development needs. In accordance with national planning policy, a Basildon Borough Gypsy, Traveller and Travelling Showpeople Local Needs Accommodation Assessment (BBLNAA) was completed in December 2013. In addition, through the Duty to Cooperate, the Council participated in the collation of the wider Essex Gypsy, Traveller and Travelling Showpeople Local Needs Accommodation Assessment (ELNAA) published later in July 2014 alongside all other Greater Essex local planning authorities and the County Council.	None required.	DLP/2086
Gypsies/Travellers/Travelling Showpeople have become concentrated in a number of local authorities including Basildon and Thurrock.	H3.75	Noted.	N/A.	DLP/2086

Wish to engage further with the Council regarding the provision for future needs and requirements of Gypsies/Travellers/Travelling Showpeople.	H3.76	Noted and agreed.	Continue to work with partners and stakeholders.	DLP/2086
Welcomes plans to largely meet Gypsy and Traveller sites within the borough boundary.	H3.77	Noted.	None required.	DLP/1754
Wish to be kept informed about progress on the Duty to Co-operate regarding former Dale Farm site.	H3.78	Noted and agreed.	Continue to work with partners and stakeholders.	DLP/1754
Additional pitches should be put on already established sites.	H3.79	National policy suggests that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family, rather than large sites. Government guidance suggests that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. Nonetheless, the BBSPS has identified and assessed a number of existing sites which it considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots.	None required.	DLP/1940, DLP/2098, DLP/2108, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003,

				DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4293, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162, DLP/5171, DLP/5172, DLP/5181, DLP/5190, DLP/5199, DLP/5208, DLP/5217, DLP/5226, DLP/5235, DLP/5244, DLP/5253, DLP/5262, DLP/5271, DLP/5280, DLP/5298, DLP/5323, DLP/5332, DLP/5341, DLP/5350,
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				DLP/5359, DLP/5368, DLP/5377, DLP/5386, DLP/5395, DLP/5404, DLP/5413, DLP/5422, DLP/5431, DLP/5474, DLP/5483, DLP/5492, DLP/5501, DLP/5511, DLP/5519, DLP/5528, DLP/5540, DLP/5549, DLP/5558, DLP/5566, DLP/5574, DLP/5583, DLP/5592, DLP/5601, DLP/5610, DLP/5619, DLP/5628, DLP/5637, DLP/5646, DLP/5655, DLP/5664, DLP/5673, DLP/5682, DLP/5692, DLP/5707, DLP/5717, DLP/5726, DLP/5735, DLP/5747, DLP/5759, DLP/5770, DLP/5780, DLP/5791, DLP/5800, DLP/5811, DLP/5820, DLP/5829, DLP/5838, DLP/5847, DLP/5857, DLP/5866, DLP/5882, DLP/10191,
Travellers should be subject to council tax, rent, utilities bill e.tc.	H3.80	All Gypsies and Travellers living on a local authority or privately owned sites pay council tax, rent, gas, electricity, and all other charges measured in the same way as other houses. Those living on unauthorised encampments, generally speaking, do not pay council tax, but they also do not generally receive services.	None required.	DLP/1070, DLP/1072, DLP/2268, DLP/2288, DLP/2415, DLP/2884, DLP/5123, DLP/11577, DLP/11606, DLP/11634, DLPQQ/948
Supports the inclusion to work with ECC in respect of the large scale unauthorised former site at Dale Farm and the provision of transit sites.	H3.81	Support noted.	None Required.	DLP/2466
Observations regarding wording changes to Policy H 3, to include reference to current activities within ECC concerning the delivery of transit sites.	H3.82	Noted, the Council will consider wording changes.	Consider wording changes.	DLP/2466

Questions why no gypsy and traveller sites were proposed in Billericay.	H3.83	The locations of additional pitches were informed by the Gypsy and Traveller and Travelling Showpeople Sites Study (2015) which assessed sites that had been put forward for such development for their suitability. There were no suitable and available sites within Billericay.	None required.	DLP/45, DLP/587, DLP/1319, DLP/2329, DLP/4326, DLP/9213, DLP/9226, DLP/9227 DLP/16122, DLPQQ/58, DLPQQ/67, DLPQQ/266
Object to proposed Gypsy and Traveller sites.	H3.84	Objection noted.	N/A.	DLP/1109, DLP/2105, DLP/2329, DLP/7197, DLP/7202, DLP/7300, DLP/8019, DLP/8023, DLP/8622, DLP/8812, DLP/9391, DLP/9481, DLP/20314, DLP/20460, DLP/20525, DLPQQ/1001
The Council is responsible for providing traveller pitches but where would these be?	H3.85	Policy H 3 sets out the Council's strategy in providing Gypsy, Traveller and Travelling Showpeople accommodation.	None required.	DLP/2329
The Council is allowing infill on the cleared Dale Farm site where travellers were evicted.	H3.86	The Plotland Infill Areas were informed by the Plotland Study (2015) which undertook an assessment of each of the 13 Plotland areas to identify their potential for development which would not harm the openness of the Green Belt. Dale Farm is not currently within the Crays Hill Plotland infill area. The BBSPS however identified and assessed a number of sites which it considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots, and these included some sites within the authorised provision at Oak Lane and Hovefields. The Council therefore allocated suitable sites for gypsy and traveller pitches based on the Gypsy and Traveller and Travelling Showpeople Sites Study and these are identified separately on the Policies Map and under Policy H6.	None required.	DLP/2380
Hovefields should either be returned to Green Belt or completely removed from the	H3.87	Hovefields is currently identified within the extent of the Borough's Green Belt where policies GB4 to GB11 would be applied when proposals for development within the extent of the Green Belt	Consider reviewing evidence base.	DLP/2380

Green Belt to allow development.		are considered. However the entire site has not previously been submitted as part of the Local Plan preparation. The Council will consider recommendations for this alternative site for development.		
Objects to gypsy and traveller pitches on strategic housing sites based on viability and deliverability.	H3.88	Noted. In line with the NPPF, Policy H 3 under Criterion 1 (e) seeks a more flexible approach to the sites coming forward from year 6 onwards, recognising the impact of economic cycles and variations in values and policy changes over time. While sites H9 to H27 might not be viable now, they might instead only become viable at a future point in time.	None required.	DLP/2506, DLP/3057, DLP/4613, DLP/11480, DLP/11719, DLP/11708
Observations regarding wording changes to criterion 1 (e) of Policy H3 regarding the consideration of unmet traveller needs on strategic sites.	H3.89	Noted. The Council will consider wording changes and will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	Consider wording changes.	DLP/2506
Only few Gypsies/Travellers would meet the definition of Gypsy/Traveller for planning purposes.	H3.90	Noted. Paragraph 4 of the NPPF makes it clear that local planning authorities should consider the Government's PPTS, in conjunction with the NPPF, when preparing plans or making decisions on Travellers Sites in their area. The Local Plan seeks to identify those gypsies and travellers which should be planned for in accordance with the PPTS, as they retain a nomadic lifestyle, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Childrens and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a nomadic lifestyle and where the PPTS does not apply.	None required.	DLP/2853
The occupiers of Dale Farm are experiencing deprivation.	H3.91	Noted. Policy H 3 states that the Council will seek to provide for the accommodation and well-being needs of the Borough's gypsy, traveller and travelling showpeople. Deprivation does not	Consider whether further detail could be given in Policy H 3 relating to the well-being of	DLP/2853

		only affect travellers in the borough, but other communities as well, with relatively high levels of deprivation in the borough, particularly to the south. The draft local plan sets out how the Council will address deprivation within the borough as it relates to employment, education and skills, health, living environment e.tc.	gypsy, traveller and travelling showpeople communities.	
Dale Farm should be included within the Plotland infill.	H3.92	Policy GB 3 covers the evidence which led to the proposed allocations of plotland infill in the borough. However the entire site has not previously been submitted as part of the Local Plan preparation. The Council will consider recommendations for this alternative site for development.	Consider reviewing evidence.	DLP/2853
Greenbelt must be preserved.	H3.93	Noted. The NPPF makes it clear that Local Planning Authorities (LPAs) should plan positively to meet the development needs of the area, with sufficient flexibility to adapt to rapid change. One of the NPPF's Core Planning Principles is to meet the objectively assessed need for housing, business and other development needs of an area and respond positively to wider opportunities for growth. In accordance with national planning policy, the LPA must consider whether its Green Belt boundaries need to be adjusted through the review of the Local Plan in order to allocate enough land to meet those needs. The Council have carried out a Green Belt review and identified the most appropriate locations for development so that the areas of highest Green belt value can be protected and defensible in the long term.	None required.	DLP/1413, DLP/2690, DLP/2868, DLP/3128, DLP/3149, DLP/3156, DLP/3117, DLP/3328, DLP/3300, DLP/3283, DLP/3265, DLP/3243, DLP/3221, DLP/3232, DLP/3207, DLP/3188, DLP/3392, DLP/3410, DLP/3429, DLP/3468, DLP/3503, DLP/3511, DLP/3490, DLP/3471, DLP/3426, DLP/3403, DLP/3383, DLP/3452, DLP/3691, DLP/3522, DLP/3543, DLP/3589, DLP/3603, DLP/3621, DLP/3674, DLP/3615, DLP/3651, DLP/3673, DLP/3554, DLP/3636, DLP/3590, DLP/3567, DLP/3533, DLP/3826, DLP/3720, DLP/3710, DLP/3840, DLP/3816, DLP/3750, DLP/3763, DLP/3783, DLP/3774, DLP/3837, DLP/3792, DLP/3738, DLP/3729, DLP/3699, DLP/4003, DLP/3959, DLP/3854, DLP/3878, DLP/3893, DLP/3919, DLP/3939, DLP/3975, DLP/3869, DLP/3900, DLP/3928,

				DLP/3911, DLP/3968, DLP/3986, DLP/4123, DLP/4025, DLP/4096, DLP/4048, DLP/4115, DLP/4014, DLP/4029, DLP/4044, DLP/4061, DLP/4084, DLP/4100, DLP/4128, DLP/4270, DLP/4283, DLP/4295, DLP/4243, DLP/4150, DLP/4179, DLP/4198, DLP/4207, DLP/4145, DLP/4281, DLP/4310, DLP/4161, DLP/4170, DLP/4188, DLP/4372, DLP/4234, DLP/4349, DLP/4247, DLP/4262, DLP/4563, DLP/4617, DLP/4606, DLP/4502, DLP/4584, DLP/4390, DLP/4451, DLP/4467, DLP/4327, DLP/4404, DLP/4383, DLP/4364, DLP/4555, DLP/4548, DLP/4570, DLP/4632, DLP/4673, DLP/4641, DLP/4651, DLP/4664, DLP/4765, DLP/4791, DLP/4527, DLP/4479, DLP/4488, DLP/4537, DLP/4919, DLP/4903, DLP/4883, DLP/4833, DLP/4858, DLP/4932, DLP/4981, DLP/4741, DLP/4876, DLP/4866, DLP/4799, DLP/4739, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4763, DLP/5094, DLP/4999, DLP/5060, DLP/5051, DLP/5042, DLP/5026, DLP/5017, DLP/5112, DLP/4839, DLP/4728, DLP/4914, DLP/5235, DLP/5226, DLP/5217, DLP/5208, DLP/5126, DLP/5092, DLP/5073, DLP/5162, DLP/5144, DLP/5135, DLP/5199, DLP/5190, DLP/4990, DLP/5395, DLP/5386, DLP/5377, DLP/5368, DLP/5359, DLP/5350, DLP/5341, DLP/5332, DLP/5323, DLP/5298, DLP/5244, DLP/5271, DLP/5262,
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<p>Travellers should not be placed in close proximity to the settled community.</p>	H3.94	<p>The Council has a responsibility to make provision for the accommodation needs of both the settled community and gypsies/travellers. Therefore, a careful balance must be struck which ensure that the Council does not exclude gypsies and travellers, or indeed any other group with a protected characteristic, whilst also ensuring that the needs of the community as a whole are met. It may be the case that if residents are concerned about the close proximity, that sites within the Green Belt which are normally more favoured by gypsies and travellers in any event, are considered more</p>	<p>Give consideration to an approach in meeting the accommodation needs of gypsies and travellers which overcomes the proximity issues raised by allowing for the provision of sites within the current extent of the Green Belt.</p>	<p>DLP/102, DLP/158, DLP/160, DLP/161, DLP/274, DLP/368, DLP/1857, DLP/1989, DLP/2690, DLP/2868, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589,</p>

		favourably within the Local Plan in meeting the needs of gypsies and travellers.	DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774, DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4295, DLP/4310, DLP/4326, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919,
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Sets out context for reviewing Green Belt.	H3.95	Noted.	N/A.	DLP/3065

Questions methodology used in Whole Local Plan and CIL Viability Study.	H3.96	Noted. The Council will consider updating the evidence base in light of comments received.	Consider updating evidence base.	DLP/3057
No new traveller site on H16, but traveller site in Crays Hill should be extended instead.	H3.97	National policy suggests that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family, rather than large sites. Government guidance suggests that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. Nonetheless, the BBSPS has identified and assessed a number of sites which it considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots, and these included some sites within the authorised provision at Oak Lane and Hovefields. The methodology used to identify sites to meet Gypsy, Traveller and Travelling Showpeople needs in the Borough has been developed driven by national guidance (see BBSPS 2015).	None required.	DLP/3487
Travellers should be accommodated in council/social housing.	H3.98	As a consequence of the changes to definition of gypsies and travellers in the 2015 update to the PPTS which requires gypsies and travellers, for planning purposes, to demonstrate a nomadic lifestyle, additional interviews were commissioned to update the BBLNAA in October 2015. The purpose of this work is to identify those gypsies and travellers which should be planned for in accordance with the PPTS, as they retain a nomadic lifestyle, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Childrens and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a	None required.	DLP/420, DLP/3487, DLPQQ/194

		nomadic lifestyle and where the PPTS does not apply. This work is ongoing, but is not likely to alter the overall assessment of need, but rather, how it is met through different sites in this plan. The PPTS makes it clear at paragraph 3 that the Government's overarching objective is to ensure fair and equal treatment for gypsies and travellers, in a way that facilitates their lifestyle while respecting the interests of the settled community. Therefore, the Council is required by law to meet the needs of those gypsies and travellers which should be planned for in accordance with the PPTS as they retain a nomadic lifestyle, as well as those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Childrens and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a nomadic lifestyle and where the PPTS does not apply.		
The number of families on the authorised and unauthorised pitches is not known.	H3.99	A detailed survey of the Gypsy and Traveller population in Basildon Borough was carried out to deliver the outputs of the BBLNAA. The study sought to identify the location of all known sites in the study area and the number of pitches or plots on each one. The study also gathered information from recent caravan counts and information on unauthorised encampments in the area and also waiting lists for public sites which are managed by the County Council.	The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	DLP/3881
Crays Hill already has too many gypsy and traveller sites, and should not be taking more.	H3.100	Noted. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their full objectively assessed need. The Borough's full objectively assessed need is for 15,260 homes, 49ha of employment land and 240 Gypsy and Traveller pitches. In line with the NPPF, the Council must demonstrate that this need can be met on sites	None required.	DLP/97, DLP/99, DLP/546, DLP/3881, DLP/20643DLPQQ/740

		that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact. Pitches are not proposed in locations where the Council does not have a land interest, and where pitches are not being proposed by private landowners, as it is not considered possible to deliver pitches in such instances and the approach to pitch provision in the local plan would not therefore be effective.		
Why is a gypsy/traveller site allocated on site H 13?	H3.101	Paragraph 11.44 makes reference to the use of Council assets on site H 13 to secure 15 additional pitches in order to overcome some of the viability issues associated with securing pitches alongside traditional housing provision on strategic sites.	None required.	DLP/4326
There should be equal distribution of traveller sites across the borough.	H3.102	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt. The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	Consider reviewing evidence base.	DLP/292, DLP/4510, DLP8844,
Explains context of the Dale Farm Incident.	H3.103	Noted.	N/A.	DLP/5024DLPQQ/865
Issues resulting from the Dale Farm events in terms of flooding/pollution/poor infrastructure/inequality e.tc, remain unresolved.	H3.104	Noted. Policy H 3 states that the Council will seek to provide for the accommodation and well-being needs of the Borough's gypsy, traveller and travelling showpeople. In addition, Policy H31 sets out the types of considerations that will be factored into assessing whether new or expanded sites meet policy aspirations.	The Council will keep this situation under review in the development of the Local Plan.	DLP/5024, DLP/292, DLP8844

How did the Council arrive at the number of pitches required for gypsy and traveller accommodation?	H3.105	A detailed survey of the Gypsy and Traveller population in Basildon Borough was carried out to deliver the outputs of the BBLNAA. The study sought to identify the location of all known sites in the study area and the number of pitches or plots on each one. The study also gathered information from recent caravan counts and information on unauthorised encampments in the area and also waiting lists for public sites which are managed by the County Council.	None required See BBLNAA.	DLP/5123, DLP/5746DLPQQ/217, DLPQQ/860
The number of sites should be reduced because of previous/existing illegal sites.	H3.106	The BBLNAA identifies a requirement arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites of 104 pitches, while that arising from the large scale unauthorised site at Dale Farm is 136 additional pitches. The Council considers the need arising from the unauthorised site at Dale Farm to be a significant increase of its need, with demonstrably insufficient land available for that purpose. This need will therefore need to be met through the Duty to Cooperate.	None required.	DLP/5746
Will illegal pitches be made legal at each Local Plan monitoring review?	H3.107	Policy H 3 seeks to provide for the accommodation and well-being needs of the Borough's gypsy, traveller and travelling showpeople by allocating suitable, available and achievable land within the Borough. In addition, Policy H31 sets out the types of considerations that will be factored into assessing whether new or expanded sites meet policy aspirations. An Annual Monitoring Report is a legal requirement to monitor various indicators of the Local Planning Authority in relation to preparing the Local Plan and planning decisions in the Borough. It will contain an assessment of the extent to which policies set out in the Local Plan are being achieved, and whether targets are being met. Should this monitoring identify that	None required.	DLP/5746

		policies and allocations are not being achieved or are not in compliance with up to date policy, the following mechanisms could be triggered by the Monitoring Report: a review of relevant supply of development related allocations; review of relevant policies; and if necessary, a review of the Local Plan.		
It is not clear why the Alternative Options H 3 are not viable.	H3.108	Paragraph 173 of the NPPF states that sustainable development requires careful attention to viability and costs in both plan-making and decision-taking, and that plans should be deliverable. The Whole Plan Viability Assessment (2015) evidences that the requirements of the NPPF are met.	None required. See Whole Local Plan and CIL Viability Study (2015).	DLP/37
It is not clear how land will be secured, managed, and delivered.	H3.109	The Draft Local Plan does not seek to phase development sites identified in this plan, except in cases where infrastructure is required in advance of development. It has however prepared a trajectory of supply, based on its understanding of development constraints, developer readiness and build rates so that the delivery of housing (including specialist accommodation for older people, and Gypsy, Traveller and Travelling Showpeople's needs as required) and employment land can be effectively managed alongside upgrades to the Borough's infrastructure. This will be monitored by the Council through its Annual Monitoring Report (AMR) to determine whether any phases can come forward earlier, or where others may need to be delayed due to infrastructure issues, or other unforeseen circumstances.	The Council will keep this situation under review in the development of the Local Plan in the event any evidence or priorities change.	DLP/37
More land should be released from the Green Belt for Gypsy/Traveller sites.	H3.110	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within	None required.	DLP/37

		the Borough during the plan period, including locations in the Green Belt.		
Gypsy and Traveller pitches should be provided for in small clusters.	H3.111	Government guidance does suggest that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. Nonetheless, the BBSPS has identified and assessed a number of existing sites which it considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. Policy H 31 sets out the development management criteria applicable when considering the new or expanding gypsy, traveller or travelling showpeople sites. In line with national guidance, criterion B states that 'the maximum number of pitches to be provided on any one site is restricted to 15'.	None required.	DLP/703
The former allotment land at the back of Haslemere Road should be restored back to its previous use.	H3.112	In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. Land in this location had been previously designated as an Area of Special Reserve in the Basildon District Local Plan. The former allotments identified for the provision of gypsy and traveller pitches is no longer in use for allotment purposes, and has not been for some time. There is no legal requirement on the Council for this land to be used for allotment purposes.	None required.	DLP/274, DLP/1413, DLP/1414, DLP/1857, DLP/2690, DLP/2821, DLP/2868, DLP/3063, DLP/3107, DLP/3117, DLP/3128, DLP/3149, DLP/3156, DLP/3188, DLP/3207, DLP/3221, DLP/3232, DLP/3243, DLP/3265, DLP/3283, DLP/3300, DLP/3328, DLP/3383, DLP/3392, DLP/3403, DLP/3410, DLP/3426, DLP/3429, DLP/3452, DLP/3468, DLP/3471, DLP/3490, DLP/3503, DLP/3511, DLP/3522, DLP/3533, DLP/3543, DLP/3554, DLP/3567, DLP/3589, DLP/3590, DLP/3603, DLP/3615, DLP/3621, DLP/3636, DLP/3651, DLP/3673, DLP/3674, DLP/3691, DLP/3699, DLP/3710, DLP/3720, DLP/3729, DLP/3738, DLP/3750, DLP/3763, DLP/3774,

				DLP/3783, DLP/3792, DLP/3816, DLP/3826, DLP/3837, DLP/3840, DLP/3854, DLP/3869, DLP/3878, DLP/3893, DLP/3900, DLP/3911, DLP/3919, DLP/3928, DLP/3939, DLP/3959, DLP/3968, DLP/3975, DLP/3986, DLP/4003, DLP/4014, DLP/4025, DLP/4029, DLP/4044, DLP/4048, DLP/4061, DLP/4084, DLP/4096, DLP/4100, DLP/4115, DLP/4123, DLP/4128, DLP/4145, DLP/4150, DLP/4161, DLP/4170, DLP/4179, DLP/4188, DLP/4198, DLP/4207, DLP/4234, DLP/4243, DLP/4247, DLP/4262, DLP/4270, DLP/4281, DLP/4283, DLP/4295, DLP/4310, DLP/4327, DLP/4349, DLP/4364, DLP/4372, DLP/4383, DLP/4390, DLP/4404, DLP/4451, DLP/4467, DLP/4479, DLP/4488, DLP/4502, DLP/4516, DLP/4527, DLP/4537, DLP/4548, DLP/4555, DLP/4563, DLP/4570, DLP/4584, DLP/4606, DLP/4617, DLP/4632, DLP/4641, DLP/4651, DLP/4664, DLP/4673, DLP/4685, DLP/4694, DLP/4703, DLP/4712, DLP/4728, DLP/4739, DLP/4741, DLP/4763, DLP/4765, DLP/4791, DLP/4799, DLP/4833, DLP/4839, DLP/4858, DLP/4866, DLP/4876, DLP/4883, DLP/4903, DLP/4914, DLP/4919, DLP/4932, DLP/4981, DLP/4990, DLP/4999, DLP/5008, DLP/5017, DLP/5026, DLP/5042, DLP/5051, DLP/5060, DLP/5073, DLP/5092, DLP/5094, DLP/5112, DLP/5126, DLP/5135, DLP/5144, DLP/5162,
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Gypsy and traveller sites should be allocated in Billericay.	H3.113	In line with the NPPF, the Council must demonstrate that its objectively assessed need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact, including assessing the landscape, Green Belt, historic environment and infrastructure improvements. Pitches are not proposed in locations where the Council does not have a land interest, and where pitches are	None required.	DLP/2187, DLP/20096DLPQQ/44

		not being proposed by private landowners, as it is not considered possible to deliver pitches in such instances and the approach to pitch provision in the local plan would not therefore be effective.		
The needs arising from Dale Farm should be resolved and the PPTS doesn't refer to unmet need being met by neighbouring authorities under the Duty to Cooperate.	H3.114	The Council is currently undertaking a engaged with Chelmsford once the results are known.	??	DLP/163
Gypsy and travellers sites should be distributed more evenly around the Borough.	H3.115	In line with the NPPF, the Council has used its evidence base to distribute the development in sites that are deliverable and can meet the objectively assessed need of the Borough.	None required.	DLPQQ/997, DLPQQ/682
Encouraged that the Council has included Travellers & Gypsies in the Draft Local Plan.	H3.116	Noted.	None required.	DLPQQ/485
The housing needs of Gypsies and travellers have not been given the same weight as those of the settled community.	H3.117	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period, including locations in the Green Belt. The methodology used to calculate accommodation need and future pitch and plot requirements has been developed over the past 10 years, and provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment which has been updated in light of Planning Policy for Traveller Sites 2015 (BBLNAA).	None required. See BBLNAA and BBSPS.	DLPQQ/485
The Council should facilitate opportunities for members of	H3.118	The Council notes the suggestion, however the Local Plan covers the policies that would apply	None required.	DLPQQ/485

the settled community and the prospective Traveller residents to engage in constructive dialogue, prior to any development.		and does not control whether such suggestions would come forward from developers.		
How will the Council ensure the tidiness of proposed gypsy/traveller sites?	H3.119	By working in partnership with relevant stakeholders to make provision for gypsy and traveller accommodation needs not just in Basildon, but in the wider Essex area, the Council expects to prevent issues that may be associated with under provision, illegal pitches and unauthorised development. Conditions can also be put on planning applications, which can be enforced if they are not being complied with.	Consider whether further detail could be given in Policy H3 relating to the impact of traveller sites on residential amenity.	
Dissatisfied with the proposed gypsy and traveller pitches.	H3.120	Noted.	None required.	
All future G&T sites should be council controlled, and a warden appointed.	H3.121	The Council notes the suggestion, however the Local Plan covers the policies that would apply and does not control whether such suggestions would come forward from developers.	None required.	DLPQQ/996
Where are the proposed new gypsy and traveller pitches to be located.	H3.122	The details of the gypsy and traveller pitches are set out within policy H 3. The Council has a legal obligation to provide for the Borough's development needs and has a responsibility to provide for growth in line with the Government's growth agenda. The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their objectively assessed need. The Borough's objectively assessed need includes 104 Gypsy and Traveller pitches, with 136 additional pitches from the large scale unauthorised site at Dale Farm. In line with the NPPF, the Council has used its evidence base to distribute the development in sites that are deliverable and can meet the objectively assessed need of the Borough.	None required.	DLPQQ/741

Seeks the inclusion of HCA land at Church Road and Popes Green within the established residential area in order to bring about its potential for residential development.	H4.1	Consideration will be given to the extent of the area identified as the existing residential area in order to determine whether the inclusion of these sites would be appropriate. It would be consistent with the approach taken in the Draft Local Plan to ensure the best use of urban land.	Review the extent of the 'existing residential area' in order to determine whether the HCA land at Church Road and Popes Green should be included within its extent.	DLP/5467, DLP/20176, DLP/20153
Further detail should be given regarding existing Gypsy and Traveller Sites in Basildon.	H5.1	The BBLNAA contains information on the location of all known sites in the Borough, and the number of pitches or plots on each one.	None required. See Appendix A of the BBLNAA.	DLP/153, DLP/178, DLP/179,
What steps are being taken to enforce against planning breaches?	H5.2	The Council's Planning Enforcement Service investigates alleged breaches of planning control and can pursue enforcement action when it is found that a breach of planning control regulations has been committed. The process for dealing with an unauthorised gypsy or traveller encampment on council land can be found on the Council's website: http://www.basildon.gov.uk/article/5674/Gypsies-and-Travellers---Unauthorised-Encampments	None required.	DLP/153, DLP/178, DLPQQ/760
Why has enforcement action not been taken against tolerated pitches?	H5.3	The tolerated sites in the borough are those where the Council has decided not to seek the removal of the encampment/site, and where the encampment/site has been, or is likely to be, allowed to remain for an indefinite period of months or years.	Consider updating evidence base.	DLP/179
Support Policy H 5.	H5.4	Support noted.	None required.	DLP/38
Generally, only small sites should be developed to facilitate integration.	H5.5	The Council has used an approach similar to that of the appraisal of housing sites within the HELAA, to evaluate suitable and available locations available to meet the need for gypsy and traveller accommodation provision within the Borough during the plan period. Policy H 31 also sets out the development management criteria applicable when considering the new or expanding gypsy, traveller or travelling showpeople sites. In line with national guidance,	None required.	DLP/1286

		<p>criterion B states that 'the maximum number of pitches to be provided on any one site is restricted to 15'.</p>		
<p>Crays Hill has a fair quota of travellers at present.</p>	H5.6	<p>Noted.</p>	N/A.	DLP/3672, DLP/3658
<p>Green belt sites should be inset from the Green Belt.</p>	H6.1	<p>New Gypsy and Traveller Site provision are identified within the extent of the Green Belt on the Proposals Map, and in Appendix 4. Policies H31 and H32 set out the development management criteria applicable when considering New Gypsy and Traveller Site or Park Home Provision. The Council will consider wording changes to clarify that these areas are to be retained for such uses.</p>	<p>Consider wording changes.</p>	DLP/39, DLP/43, DLP8844,
<p>Observations regarding wording changes to Policy H 6, to include reference to Policy H 31 under criterion (b).</p>	H6.2	<p>Noted, the Council will consider wording changes.</p>	<p>Consider wording changes.</p>	DLP/39
<p>Object to Policy H 6.</p>	H6.3	<p>Objection noted.</p>	N/A.	DLP/2500
<p>Object to the loss of Eversley Park for Traveller pitch.</p>	H6.4	<p>Policy H13 is clear that 75ha of open space should be provided in this location. This compensates for the loss of Eversley Park, with the reprovision of the park on flatter ground which enables playing pitch provision and use supported by Sports England.</p>	<p>None required.</p>	DLP/1289
<p>Object to a traveller site at Dunton as it pre-supposes development.</p>	H6.5	<p>At this time no changes have been made to any of the planning boundaries in the borough, as identified in the Basildon District Local Plan 1998. Any policies and allocations set out in the Draft Local Plan document are draft only, and are subject to change as the plan is progressed towards submission. The new Local Plan will not be adopted until such time as it has been through an Examination in Public and found sound by a Planning Inspector.</p>	<p>None required.</p>	DLP/1289

The council didn't inform residents of the proposal for additional pitches.	H6.6	The Draft Local Plan January 2016 sets out an initial draft of a new Local Plan for Basildon Borough and has been prepared for the purposes of consultation under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council used a number of consultation methods to notify the public and statutory consultees of the consultation in line with the Statement of Community Involvement First Revision. The methods used included a Special Edition of the Borough Diary distributed to 74,000 households, letters and emails to consultees on the Council's consultation database, posters in public libraries, advertisements in the Basildon cinema, newspapers, internet and radio advertisements, social media promotion and public exhibitions amongst others. It is considered that the methods used were sufficient to reach a wide range of demographics within the Borough and this is reflected in the high number of consultation responses received.	None required.	DLP/1932
Support the inclusion of traveller pitches on Gardiners Lane South.	H6.7	Support noted.	None required.	DLP/2849
Why are only 10 pitches proposed on the former Haslemere allotments?	H6.8	The former allotment land has been evaluated by the Gypsy, Traveller and Travelling Showpeople Site Potential Study (2015) as being suitable to be allocated for a 10 pitch gypsy and traveller site.	None required.	DLP/2849
Support the expansion of gypsy/traveller site at Hovefields.	H6.9	Support noted.	None required.	DLP/2849
Support the potential of Plotland Infill to facilitate the provision of pitches.	H6.10	Support noted.	None required.	DLP/2849

<p>The proposal to use 5 to 10% of plotlands to accommodate the growth of local gypsy and traveller families should be increased.</p>	<p>H6.11</p>	<p>The Council recognises the potential for some additional supply of sites to come forward in the plotlands. However, these plots have not been promoted for that purpose, and this supply cannot be certain. The provision of 5% to 10% is not a policy, but rather used to estimate the number of pitches that could be accommodated within plotlands given the requirements of Policy GB3. Policy GB3 permits for plotland infill to occur subject to specific criteria including a requirement for a local connection to the plotland in question, and for the development to be low in scale and spaciouly set within the site. Proposals for development within the plotlands will be supported where they are compliant with Policy GB3 and all other relevant policies of the plan.</p>	<p>None required.</p>	<p>DLP/2849</p>
<p>Object to development around Barn Hall, Wickford because the area is overpopulated.</p>	<p>H6.12</p>	<p>The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPA) to meet their full objectively assessed need. The Borough's full objectively assessed need is for 15,260 homes, 49ha of employment land and 240 Gypsy and Traveller pitches. In line with the NPPF, the Council must demonstrate that this need can be met on sites that are ready for development. The Council has many evidence base documents that have been used in the preparation of the Local Plan to determine the most appropriate sites that will have the least negative impact.</p>	<p>Review appropriateness of development locations in light of merits of counter proposals and new/updated evidence.</p>	<p>DLP/2821DLPQQ/626</p>