

Daventry District Gypsies, Travellers and Travelling Showpeople Local Plan (Part 2b) Issues and Options Sustainability Appraisal

Name	1a	1b	1c and general comments
Frances Allbury Clerk to Braybrooke Parish Council	S01a Site Location		Travel. There are in fact 27 pitches in the Daventry DC area, not 25 as stated in this part of the document. 23 of these pitches are in Justin Park on the A508 only yards away from the county boundary and on the doorstep of Market Harborough. Golden Stables in Arthingworth Parish provides the other 4 pitches and is an unsustainable location needing travel to all services by personal transport using single track roads for miles all any direction. We would remind you that these two sites provide 100% of Daventry DC permanent traveller sites; and even when the remaining 18 are allocated they will still provide 60% of all permanent sites in Daventry District. More sites must be found, distributed around the District.
	S04a Site Size Site Location		<p>Crime and Community safety. From our experience over many years it is clear a maximum of 4 pitches is far more acceptable. This size is less threatening to the nearest settled community. We have observed that larger sites have produced problems – eg the larger sites in Braybrooke parish, and Justin Park. Small sites can be more easily monitored.</p> <p>Crime and Community Safety. We fully support smaller sites. In this respect the large Justin Park site must not be allowed to grow, or be replicated elsewhere. This site is a prime example of the law and order problems associated with large sites. In our experience whoever runs the sites needs to be accountable to the local authority, making it essential that all sites are routinely monitored and conditions set and adhered</p>
	S05a Site Allocation Site Size Site Location		<p>Shared education is essential for integration and we urge you to consider the size and number of sites/pitches in relation to the nearest settled community. We refer you to our experience of Braybrooke Primary School which came to have a totally traveller intake and then was closed because of insufficient number on the roll.</p> <p>The number of traveller children attending a local school is crucial. There is a balance of numbers that allows and encourages integration. If the number is too high there are</p>

		<p>difficulties both for travellers and the settled community.</p> <p>To allow/encourage integration, the number of pupils entering any school is crucial. Integration must start at a young age otherwise there will always be separation.</p>
	S05b Site Allocation	Sustainable modes of transport. Traveller transport is generally by van, flat-bed truck and 4x4. Narrow country roads are damaged by the frequent use of these types of vehicle. Speed of vehicle through villages must also be considered.
	S08a Site Allocation Site Location	Access to Employment. Gypsies and travellers generally work in landscaping/cars/recycling and do not enter into employment in manufacturing/shops/offices. Consequently appropriate placing of sites is of the utmost importance to ensure local settled communities are not dominated and the environment not damaged.
	S010a Site Tenure	Housing. Please see comments on issue 4, S04a. These points need to be borne in mind together with our experience that pitches on sites are often subdivided creating bigger sites than originally intended or wanted. To this end, close monitoring is needed. It is important that the traveller community are seen to follow the same rules as the settled community.
	S011a Site Location	We note that over 90% of gypsies and travellers surveyed found that access to services was OK. The vast majority of travellers live at Justin Park and access services in Market Harborough. Any new sites must be located away from this area but with an equal opportunity for residents to avail themselves of a full range of services.
	General	It is highly likely that settled residents of new developments would be anxious if their housing was in close proximity to a traveller site. The size of the site would be crucial and screening has to be considered. If the requirements of such provision prove to be too problematic, option 2 could be a reasonable solution. Moreover gypsies and travellers must be accommodated with the same care as the settled community and be subjected to the same restrictions. This is an opportunity to create a level playing field and give equal treatment to everyone
Kayleigh Cheese Natural England	Table 2.2 SA Framework	Section 3. Biodiversity, flora and fauna – We are pleased that the Nene Valley Nature improvement Area has been included within this section, however it should also make specific reference to the internationally protected Nene Valley Gravel Pits Special Protection Area (SPA), which is also listed as Ramsar Site and Site of Special Scientific Interest (SSSI).

			Section 9. Landscape and townscape could also refer to the National Character Areas which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Daventry falls within: NCA Profile: 95 Northamptonshire Uplands.
Emilie Carr Historic England	Table 2.2 SA Framework		The sustainability Appraisal is very brief, however, it is appreciated that the plan is at a relatively early stage, prior to any site allocations. However, within Table 2.2 the appraisal questions to be used as a guide for SA objective 2 in relation to historic environment appear to be incomplete. A more detailed assessment criteria will be required in any case, guidance for which can be found in https://content.historicengland.org.uk/images-books/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/
	General		Although the plans are at a relatively early stage, Historic England do not appear to have been recently consulted on the scoping for the Sustainability Appraisals. Neither of the sustainability appraisals are sufficiently detailed so as to ensure a sound plan. Please find attached link to Historic England guidance which may be of assistance:- https://content.historicengland.org.uk/images-books/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/
Claire Berry Northampton Borough Council	General		No comments to make
Steve Pearce Highways England	General		Regarding the SA for Gypsies, Travellers and Travelling Showpeople Local Plan (Part 2b), Highways England has no comments to provide.
Deborah Jewell Daventry Town Council	General		Daventry Town Council have referred to the sustainability assessment, appraising the results of the issues and options consultation for the Settlements and Countryside Local Plan and for Gypsies, Travellers and Travelling Show people and advise that they found the report confusing and vague. The Town Council understand the purpose of this report is to promote sustainable

			development by integrating sustainability considerations into the plan, the actual document would appear to lack purposeful direction and the Town Council would like to have seen a more focussed response, with clear aims that would feed into and assist in the creation of the final submission document.
Stewart Patience Anglian Water			Anglian Water has no comments relating to this Sustainability Appraisal document