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For and on behalf of
North Devon and Torridge Councils

**NORTH DEVON AND TORRIDGE
TRAVELLER SITE ASSESSMENT STUDY FINAL REPORT**

North Devon and Torridge

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1.0 INTRODUCTION AND BACKGROUND

Introduction

- 1.1 DLP Planning Ltd (DLP) were appointed by North Devon and Torridge District Councils (the Councils) in 2017 to provide advice on the delivery of Gypsy, Traveller and Travelling Showpeople pitches and plots across North Devon and Torridge.
- 1.2 The study set out to identify the sites required to meet the potential accommodation needs as identified in the Devon Partnership Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA undertaken by RRR Consultancy in 2015 covers nine Local Planning Authorities (LPAs) including the partner authorities of North Devon and Torridge¹.
- 1.3 The main objective of the North Devon and Torridge Traveller Site Assessment Study is to identify and assess potential sites to determine if they are suitable, available and achievable to meet the identified needs in both districts. The results will inform the development of relevant policies and allocations in the future North Devon and Torridge Traveller Site Allocations Development Plan Document (DPD). Once adopted this will then form part of the Development Plan for the area and guide the consideration of future planning applications for Gypsy, Traveller and Travelling Showpeople sites.

Background

- 1.4 Planning Policy relating to the provision of accommodation for Gypsies, Travellers and Travelling Showpeople was reformed in 2012 with the publication of 'Planning Policy for Traveller Sites' (PPTS). This replaced Circulars 01/2006 and 04/2007 on the basis that they had failed to deliver adequate sites to meet identified needs over the previous ten years.
- 1.5 PPTS was then updated in August 2015. The most significant change brought in through this update included the amended definition of "gypsies and travellers" which now excluded those who have permanently ceased travelling. This required the Councils to update the GTAA in order to reflect this change and ensure that a robust

¹ The Devon Partnership includes Dartmoor National Park, East Devon, Exeter, Exmoor National Park, Mid Devon, North Devon, Teignbridge, Torbay and Torridge.

assessment of need was in place.

- 1.6 Gypsies and Travellers have lived in Britain for at least 500 years. For planning purposes, Gypsies and Travellers are defined as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.” (Planning Policy for Traveller Sites, CLG, August 2015).

- 1.7 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.

- 1.8 Gypsies and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:

- Romany Gypsies;
- Irish Travellers; and
- New Travellers.

- 1.9 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under equalities legislation. New Traveller is a term used to describe people who have adopted a nomadic lifestyle, generally more recently, through personal preference or force of circumstance and live in mobile/nomadic accommodation whether it is a caravan, truck, boat or yurt, for example.

- 1.10 Travelling Showpeople have traditionally been involved in holding fairs and circuses for many hundreds of years. For planning purposes, Travelling Showpeople are defined

as:

“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller Sites, CLG, August 2015).

- 1.11 National Planning Policy requires LPAs to identify and allocate sufficient sites to meet the needs of Gypsies, Travellers and Travelling Showpeople within their local plans for at least the first 5 years. Critically, allocated sites must be evidenced as being deliverable to be included within the first five years and developable for the period beyond. Footnotes 4 and 5 to Paragraph 10 of the Planning Policy for Travellers Sites (PPTS) defines the terms ‘deliverable’ and ‘developable’ as;

4 “To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”.

5 “To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”.

- 1.12 North Devon and Torridge District Councils have been working together to prepare a Joint Local Plan, the North Devon and Torridge Local Plan 2011-2031 (NDTLP), which was adopted on the 29th October 2018. The NDTLP identifies the scale, nature and location of development required to meet the districts’ future needs, along with the policies and allocations required to guide development proposals and deliver to those needs.

- 1.13 Now the NDTLP has been adopted this replaces the Saved Local Plan Policies of the

Districts' individual Local Plans; specifically, in terms of Gypsy and Traveller policy, this has replaced Saved Policy HSC11: Gypsy Site Provision in the Torridge District Local Plan. Policy HSG14 (Gypsy Accommodation) of the North Devon Local Plan (July 2006) was not formally 'saved' and therefore did not form part of the area's Development Plan beyond 2007.

- 1.14 In terms of provisions specifically for Gypsy and Traveller accommodation, the joint Local Plan includes strategic policy ST20: Providing Homes for Traveller Communities and a subordinate development management policy DM30: Sites for Traveller Accommodation. Policy ST20 sets out the required provision to be made to meet the scale of identified need across the district. Policy DM30 (see overleaf) sets out a criteria-based policy to guide the determination of future applications.

Policy ST20: Providing Homes for Traveller Communities

(1) Delivery will be pro-actively pursued to provide adequate and appropriate accommodation to meet the identified needs and demands of traveller communities in northern Devon whilst recognising their traditional and nomadic way of life and respecting the interests of the settled community.

(2) During the period 2011-2031, provision to meet identified needs in northern Devon will be made to deliver:

(a) at least 15 pitches for permanent traveller accommodation; and

(b) at least 2 transit sites or emergency stopping places each providing for the accommodation of 4 or 5 pitches.

(3) Where allocation offers the most appropriate mechanism for delivery, sites will be allocated through a Development Plan Document to provide an appropriate range of accommodation to meet the identified accommodation needs and demands of travellers across northern Devon.

(4) Proposals for traveller accommodation will be supported where they will meet an identified need whilst respecting the principles of sustainable development and having regard to the interests of the settled community.

(5) Existing authorised sites providing traveller accommodation will be safeguarded unless it is demonstrated that they are no longer required to meet identified need.

Policy DM30: Sites for Traveller Accommodation

(1) Sites for traveller accommodation will be allocated within a separate North Devon and Torridge Traveller Site Allocations Development Plan Document.

(2) Sites for traveller accommodation will be identified and planning applications will be supported, providing the sites meet all of the following criteria:

- (a) the development is commensurate and proportionate to the scale and nature of the nearest settled community;
- (b) it does not have an unacceptable landscape, visual or environmental impact
- (c) it offers an acceptable level of amenity to prospective occupants and will have no significant detrimental impact to the amenities of neighbouring occupiers;
- (d) the site is located where occupants can gain reasonable access to local services and facilities including health and school provision;
- (e) it does not place undue pressure on local infrastructure and services;
- (d) the health and safety of occupants and visitors will not be at risk through unsafe access to the site, noise pollution or unacceptable flood risk;
- (g) adequate on-site provision is afforded for vehicle parking and manoeuvring along with appropriate storage space, ancillary facilities and residential amenity space; (h) the site is capable of being provided with essential services; and
- (i) the scale of employment activity is balanced to the residential component of the proposal.

(3) Proposals seeking to deliver transit accommodation will be required to demonstrate that they offer adequate, safe and convenient access to the strategic highway network.

(4) Proposals seeking to deliver accommodation for travelling show people will be required to offer adequate provision for the on-site storage, maintenance and testing of associated equipment.

1.15 The Local Plan does not however identify or allocate any sites for the provision of traveller accommodation. The allocation of sites for Gypsy and Traveller use will be included in the North Devon and Torridge Traveller Site Allocations DPD, to be informed by this site assessment study.

2.0 EXISTING SITES AND NEEDS

2.1 Paragraph 3 of the PPTS (CLG, August 2015) states that in terms of their objectives for Travellers the overarching aim of Government is *“to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community”*.

2.2 The above policy document sets out how LPAs are required to use a robust evidence base to establish accommodation needs, including to:

- Set pitch and plot targets to address the likely permanent and transit site accommodation needs of Travellers in their area;
- Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
- Identify a supply of specific developable sites or broad locations for years 6 to 10 and where possible for years 11-15; and
- Set criteria-based policies to meet the identified need and/or provide a basis for decisions if applications come forward.

2.3 In April 2014, the Devon Partnership of local and national park authorities commissioned RRR Consultancy to undertake a GTAA. The objective of the assessment being to quantify the accommodation and housing related support needs of Gypsies and Travellers (including Travelling Showpeople) in terms of residential and transit/emergency sites and bricks and mortar accommodation for the period 2014/15 to 2034/35.

2.4 This GTAA provides North Devon and Torridge District Councils with the evidence to address the first of the PPTS requirements set out above.

2.5 This Traveller Site Assessment Study seeks to then identify and assess potential sites to meet the needs identified in the GTAA for the local planning authorities of North Devon and Torridge. The objective of this assessment is to provide robust evidence to support the Councils in the identification and allocation of sites. Policy DM30 of the North Devon and Torridge Local Plan currently provides a criteria-based policy for making decisions on future Gypsy and Traveller applications. The outcome of this

study may also however recommend a revised criteria based policy for the inclusion in a future North Devon and Torridge Traveller Site Allocations DPD.

Existing Sites

Gypsy and Traveller

- 2.6 As set out in the Devon Partnership GTAA there is a need in North Devon and Torridge for additional residential Gypsy and Traveller sites. Residential sites provide occupants with a permanent base from which to travel and can be privately owned, publicly rented (for affordable pitches), or privately rented from other Gypsies and Travellers.
- 2.7 Residential sites generally comprise a number of caravan pitches alongside associated facilities. Although there is no national definition of what size a pitch should be, a general guide contained in Designing Gypsy and Traveller Sites (now withdrawn CLG, May 2008) states that “*an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan... drying space for clothes, a lockable shed...parking space for two vehicles and a small garden*” (paragraph 7.12). On average, usage is approximately 1.7 caravans per pitch.
- 2.8 The level of facilities on residential sites varies, particularly between public and private sites. Public sites will generally have amenity blocks and sometimes play areas and communal spaces. The facilities on private sites can vary significantly depending on the specific requirements of the residents.
- 2.9 The information presented on the location and use of existing sites in North Devon and Torridge (see Table 1) is reflective of that identified through the Devon Partnership GTAA. Any subsequent changes in a site’s planning status will be reflected through this study and taken into account when considering the level of supply against identified need.
- 2.10 Within North Devon and Torridge, as of mid-2018, there were eight authorised private and occupied Gypsy and Traveller sites (two of which however hold a temporary 5-year permission). These sites range in size, but each currently account for a single authorised pitch. Within the districts there are also four unauthorised sites and four tolerated trespass sites. There are no publicly owned sites in North Devon and Torridge.

Table 1 Existing Gypsy and Traveller Pitches in North Devon and Torridge

Ref	Site Name	Local Authority	Planning Status
NDT01	The Heights, Holsworthy, EX22 6NJ	Torridge	Existing G&T (permitted) 1 pitch implemented (2 permitted)
NDT02.1	Northern Section, West Lodge, Bradworthy, Holsworthy, EX22 7SB	Torridge	Unauthorised site
NDT02.2	Little Rainbows End, Bradworthy, Holsworthy, EX22 7SB	Torridge	Unauthorised site
NDT03	Wonford Park Farm, Holsworthy, EX22 7DT	Torridge	Existing G&T (Temporary 5-year permission) 1 pitch
NDT04	The Holly, Rydon Lane, Holsworthy, EX22 7HY	Torridge	Existing G&T (permitted) 1 pitch
NDT05	Woodpark Copse, West Yeo, Witheridge, EX16 8P	North Devon	Existing G&T (permitted) 1 pitch
NDT06	Rock Hill Caravan, Queens Nympton, South Molton, EX364LE	North Devon	Existing G&T (permitted personal permission) 1 pitch
NDT07	Old Repeater Station, Bommerton Cross, Molland South, EX36 3PN	North Devon	Existing G&T (permitted) 1 pitch
NDT08	Site at Elworthy Cross, Witheridge	North Devon	Tolerated Trespass Site
NDT10	Land at OS 3059, Holsworthy Beacon	Torridge	Existing G&T (permitted personal permission) 1 pitch
NDT13	Seven Brethren, Barnstaple	North Devon	Tolerated Trespass Site
NDT39	Former Cattle Market and Car Park, Chanters Road, Bideford	Torridge	Tolerated Trespass Site
NDT42	Silcombe Wood, adj. Bish Mill junction, A361 east South Molton	North Devon	Unauthorised site
NDT43	Southern Section, West Lodge, Bradworthy, Holsworthy, EX22 7SB	Torridge	Unauthorised site
NDT44	Land at Garland Cross, Kings Nympton	North Devon	Existing G&T (Temporary 5-year permission) 1 pitch
NDT48	Tween Moors Cross, Layby West of Horse Hill Lane, West Worlington	North Devon	Tolerated Trespass Site

Travelling Showpeople

- 2.11 The needs of Travelling Showpeople are different to Gypsies and Travellers. Their sites often combine residential, storage and maintenance uses. Typically, a site contains areas for accommodation, usually caravans and mobile homes and areas for storing, repairing and maintaining vehicles and fairground equipment. These combined residential and storage sites are known as plots or yards.
- 2.12 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots (or yards) are also occupied throughout the year, often by older people and families with children, for example. The Showmen's Guild 'Model Standard Package' (2007) provides guidance on model standards and site considerations to inform the planning and development of Travelling Showpeople sites.
- 2.13 In North Devon and Torridge there are currently no existing Travelling Showpeople sites and no need has been identified in the Devon Partnership GTAA for any additional provision here.

Devon Partnership GTAA

- 2.14 According to the Devon Partnership GTAA *"Accommodation need for the study area was assessed using a model in accordance with Practice Guidance issued by the Department of Communities and Local Government (CLG). It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group of Gypsies and Travellers, based on secondary data"*. (paragraph S32, page xviii).
- 2.15 The total requirement for new accommodation in the districts of North Devon and Torridge was calculated as per the table on the following page:

Table 2 GTAA need for North Devon and Torridge in 5-year time periods

Provision	2014 2019	2019 2024	2024 2029	2029 2034	Additional Need
North Devon Gypsy and Traveller Pitches	3	1	1	1	6
Torridge Gypsy and Traveller Pitches	6	1	1	1	9

Source: Based on GTAA - Table S1, page xviii

- 2.16 The overall number of pitches required for permanent residential accommodation for Gypsies and Travellers has been estimated at an additional 6 for North Devon and additional 9 for Torridge to be delivered by 2034. In North Devon, this included a need for 3 additional pitches within the first 5 years (2014-2019) and for Torridge 6 additional pitches within the same timeframe.
- 2.17 In terms of transit provision, the GTAA also identifies a need for further transit provision within the Devon Partnership study area. According to the Councils' position this should include 4-5 additional transit sites or emergency stopping places containing 4-5 pitches across the study areas. The most appropriate locations for these sites is suggested to follow where unauthorised encampments are most likely to occur.
- 2.18 Reflecting existing provision across the study area and historic encampment activity in North Devon and Torridge, Policy ST20 in the North Devon and Torridge Local Plan sets out that at least two transit sites or emergency stopping places, each providing four to five pitches, should be provided in North Devon and Torridge. In reality, the encampment activity would suggest these should probably be provided in the vicinity of Bideford and Barnstaple.
- 2.19 If this Traveller Site Assessment Study identifies a site and it is allocated as such, it would strengthen the Councils' position when dealing with unauthorised encampment activity.

Number of Sites Required

- 2.20 National evidence would suggest that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate and extended family. Government guidance highlights 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. However, smaller sites of between 3-4 pitches can also be successful, particularly where designed for one extended family” (para 4.7 of Designing Gypsy and Traveller Sites Good Practice Guide (2008)). This is clearly the case in North Devon and Torridge, as all sites are generally small single pitch sites.

2.21 Given the number of pitches required to meet the need in both districts and the existing form of provision, the sites provided in the future are also likely to be smaller in nature. However, it is still difficult to identify the exact number of sites required to meet the pitch requirements. The actual number of sites required will be determined according to a number of factors including taking account of:

- The different cultural, ethnic and family groupings of Gypsies and Travellers;
- The extent to which additional provision could be made through extension or intensification of existing sites; and
- Whether replacement sites need to be found for existing sites which may be unsuitable or unsustainable.

3.0 METHODOLOGY

Introduction

- 3.1 This section sets out the methodology that has been followed to complete the Traveller Site Assessment Study in order to identify sites to meet Gypsy and Traveller needs across North Devon and Torridge and support the preparation of the North Devon and Torridge Traveller Site Allocations DPD.
- 3.2 The assessment involved a wide-ranging exercise to identify potential sites followed by the screening of each site on the basis of suitability, availability and achievability, utilising a staged approach to ensure the effective use of resources. The first stage (Part 1) of the assessment involved screening the sites on the basis of fundamental criteria before reviewing any remaining sites in more detail as a second stage (Part 2).

Review of Sources of Sites

- 3.3 DLP, North Devon Council and Torridge Council worked collaboratively to identify potential candidate sites to take forward through the assessment. This involved the consideration of sites from a wide range of sources including a review of the following:
- Authorised Sites - All existing Gypsy and Traveller sites with full, temporary or personal consents or certificates of lawful use (to be assessed for potential intensification and/or expansion);
 - Unauthorised Sites and those with a previous planning history - All existing unauthorised and/or tolerated sites and those sites with a previous Gypsy and Traveller related planning history;
 - Call for Sites – Between the 24th January to 24th February 2017 the Councils undertook a Call for Sites exercise in which all parties on the Councils' consultation database (circa 2,000 individuals and organisations including Town and Parish Councils) were invited to submit sites potentially suitable and available for Gypsy and Traveller uses. This exercise was undertaken alongside a consultation on the proposed methodology. The Call for Sites (and method consultation) was publicised to all on each Council's website and consultation portals including links to a draft response form. On the 4th January 2017 a media briefing for two principal local weekly newspapers was also held

by the Communications Team at North Devon Council and a press release produced to support the exercise. Any sites submitted were considered through this Assessment;

- Council Owned Land – DLP reviewed the extent of each Council’s land ownership. This involved undertaking an initial assessment removing all obviously unavailable or incidental public land such as public buildings, public open space, active waste facilities and highway verges. Any potential available sites emerging through this process were considered and taken forward in agreement with the Councils.
- Sites submitted for the Strategic Housing Land Availability Assessment (SHLAA) – The Councils contacted all promoters of sites submitted to the SHLAA for housing to establish if those sites were also available for Gypsy and Traveller use.

3.4 The output of the review was a list of sites from each source which were then taken forward into the first phase (Part 1) Assessment.

Identifying Criteria for Site Assessment

3.5 Building upon a review of national and local policy and guidance, the identified scale of need as set out in the GTAA and a consideration of physical constraints, a list of site criteria was identified to use in assessing whether sites could be considered suitable for Gypsy and Traveller use.

3.6 In developing the assessment criteria account was taken of:

- National policy, as contained within the NPPF (2012) and PPTS (CLG, August 2015);
- Existing and emerging local policy, including saved policies from the North Devon Local Plan (2006) and Torridge Local Plan (2004) and the then emerging policy from the joint North Devon and Torridge Local Plan;
- Other Guidance including The Showmen’s Guild of Great Britain ‘Model Standard Package’ 2007; and ‘Designing Gypsy and Traveller Sites’, 2008;

- The existing pattern and distribution of need for Gypsy and Traveller provision as set out in the GTAA.
- 3.7 There is a strong argument to ensure that site assessment criteria should be clear, transparent and unambiguous. Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward. Having regard to the overall policy framework, the approach to identifying appropriate site selection criteria was based on the following principles as set out in the NPPF:
- Is the site available?
 - Is the site suitable? and
 - Is the site developable? e.g. viable and deliverable?
- 3.8 These assessment criteria were incorporated into a draft methodology and subject to consultation with both Councils and relevant stakeholders. The consultation on the draft methodology ran alongside the Call for Sites, taking place between January and February 2017. As well as targeted officer consultation (including Council Officers responsible for Highways, Development Management, Urban Design etc), as with the Call for Sites, the consultation was sent to all parties on the Councils' consultation database (circa 2,000 individuals and organisations including Town and Parish Councils). Any representations received were reviewed and where appropriate the comments reflected in a revised method, before being finalised and endorsed by the two Councils.
- 3.9 The site assessment criteria established through the methodology could also reasonably be used as the basis for the development of future Council policy to guide the determination of planning applications for traveller sites.

Applying the Site Criteria

- 3.10 The site criteria were applied in two parts, the 'Part 1 Assessment' was desk based and involved the consideration and application of broad suitability criteria including absolute constraints and an initial investigation of likely availability. The 'Part 2 Assessment' took forward sites that passed Part 1 and then provided a comprehensive assessment of site suitability, availability and achievability.

- 3.11 The objective of the Part 1 Assessment was to sieve out sites which were inherently unsuitable due to major constraints, such as being within key international or national environmental designations, or within the boundaries of scheduled ancient monuments or within flood zone 3a/b.
- 3.12 Availability is a key criteria and discussions, regarding the future availability of the sites to accommodate additional pitches/plots, also informed the Part 1 Assessment. The output from Part 1 was an 'Assessment Matrix' which utilised a traffic light approach identifying where sites do not satisfy the criteria in red, where the criteria may be capable of being satisfied but require further investigation in yellow and where the criteria are satisfied in green. Table 3 overleaf sets out the Part 1 Assessment criteria.
- 3.13 To assist in the assessment of sites (particularly the desk-based review and consideration of constraints) the extent of each site was plotted digitally using mapping software (GIS). Maps covering North Devon and Torridge are contained in Appendix A showing the distribution of sites that have been subject to assessment.
- 3.14 The Part 2 Assessment (Site Survey) involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues were also investigated. All sites not rejected in the Part 1 Assessment were visited by the consultant team, but only sites considered suitable for further consideration after the site visits were distributed for officer comment and given full detailed write-ups within this report (Appendix D), with the remainder either having their reasons for rejection summarised (Appendix C) or, if they were rejected as a result of detailed consideration following a site visit during Part 2 of the assessment, have a detailed write-up provided (Appendix E).
- 3.15 Suitability, availability and achievability of these sites for permanent and transit provision was assessed in detail:
- In terms of **suitability**, each site was assessed against the agreed criteria which are broadly grouped into policy requirements, physical constraints and potential impacts.
 - In terms of **availability**, landowners were contacted to identify whether there is a reasonable prospect that sites will be available and any potential legal or ownership constraints.

- In terms of **achievability**, potential abnormal site constraints, needing to be rectified because they may affect viability were identified and any potential alternative uses likely to affect deliverability.
- 3.16 In order to fully understand the landscape implications of those sites which made it through to the Part 2 assessment, landscape consultants Enderby Associates Limited (appointed by DLP) also visited the sites undertaking landscape focused site appraisals which then fed into the Part 2 Assessment.
- 3.17 The Part 2 Assessment criteria are set out in Table 4 formed the basis of the study method agreed with the Councils. All rejected sites from both **Part 1** and **Part 2** were included in a 'rejected sites' list within the report appendices, setting out clear reasons for rejection.

Table 3 Part 1 Assessment (Desk Based) Criteria

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Flood Risk	Environment Agency Indicative Flood Mapping and SFRA Area at Risk of Flooding	The site is within flood zone 3a and/or 3b and is not suitable for Gypsy and Traveller use.	The site is within flood zones 2 requiring further investigation (and application of policy tests).	The site is not affected by identified areas of indicative flooding or is located in flood zone 1.
Environmental Designations	Special Protection Area Special Area of Conservation RAMSAR Site Site of Special Scientific Interest National Nature Reserve Site of Nature Conservation Importance	The site is within an international or national environmental designation.	The site is within the buffer or close proximity of an international or national designation and could therefore have a negative impact. The site is covered by a local designation or is within close proximity and could therefore have a negative impact.	The site is not within an international, national or local environmental designation or within its buffer.
Potential Contamination or Land Stability Issues	Potential land contamination or land stability issues	The site is located within or adjacent to, a landfill site or the land is unstable and has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There are no known contamination or land stability issues.
Noise Issues	Noise issues relating to existing land uses or transport corridors	n/a	The site is located adjacent to noisy land uses, which requires further investigation.	There are no noisy adjacent land uses and therefore no noise impact on the site.

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Residential Amenity	Location of site in relation to existing dwellings and bad neighbour uses	n/a	The site is adjacent to existing dwellings or bad neighbour uses and requires further investigation.	There are no adjacent dwellings or bad neighbour uses and therefore no impact on residential amenity.
Historic Assets	Scheduled Monuments Registered Parks and Gardens Battlefields Conservation Areas Listed Buildings Non-designated heritage assets	The site is within a Scheduled Monument or Registered Park and Garden.	The site is within or adjacent to a Conservation Area, an Archaeological Priority Area or affects the setting of listed buildings or other heritage asset'.	The site is not within or adjacent to any heritage asset.
Availability and Capacity	Submitted sites, public land ownership, etc.	The owner has confirmed that the site is not available, nor is it likely to be available in the future and/or the capacity of the site is already above the recommended size (15 pitches) set out in government guidance.	Site availability is unknown and requires further investigation. Potential for Land Registry searches (if required). Public owned sites deemed potentially available for Gypsy and Traveller use unless informed otherwise.	There is evidence that the landowner is willing to sell or develop the site for Gypsy and Traveller use.

Table 4 Part 2 Assessment (Site Survey) Criteria

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	Site promoted by landowners, agents and/or the travelling community Public land confirmed as available	Site not available for Gypsy and Traveller use. There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved. Public land has been identified in another plan / strategy for another use.	There continues to be doubt over whether the site is genuinely available for Gypsy and Traveller use after further investigations.	There is evidence that the landowner is willing to sell and/or a developer is interested in developing within the timeframe of the GTAA. There are no known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the GTAA. Public site is not identified in a plan or strategy for another use.
Contamination and unstable land	Potentially Contaminated Land Unstable Land	Contains an area of unstable or contaminated land that is likely to undermine the site's suitability and achievability.	Could contain unstable or contaminated land that should be subject to further investigation.	Not located on unstable land. Not located on contaminated land.
Topography	Topography	Steep slopes which make the site unsuitable and/or unachievable.	Sloping or undulating land which may require works to achieve a suitable development.	Level or gently sloping site.

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Biodiversity / Protected Species / Important Hedgerow	Impact on biodiversity habitats/ known protected species Local Nature Reserve Geological Conservation Review Site Sites of Importance for Nature Conservation Agricultural Land Quality	Significant effect and unacceptable impact of site upon ecology or protected species or habitats not capable of mitigation where there is no overriding public interest.	Impact capable of mitigation. Potential cumulative impact with other identified sites.	No significant effect or unacceptable impact on ecology, protected species or habitats.
Heritage Assets	Scheduled Monuments Registered Parks and Gardens Battlefields Conservation Areas Listed Buildings Non-designated Heritage Assets	Development is likely to harm to the significance of a designated heritage asset, including its setting.	Development is likely to cause some harm to the significance of a heritage asset, including its setting, but this is likely to be able to be satisfactorily minimised/mitigated to such an extent to accord with the provisions of the NPPF.	Development is unlikely to harm the significance of any heritage asset or its setting.
Site access and safety	Site access for caravans between 15 to 25 metres in length Proximity to major roads/ strategic road network	Poor access and/or road of poor standard. Likely to be subject to safety issues from surrounding uses incapable of mitigation	Access poor but capable of being improved. Road of adequate or good standard. Likely to be affected by safety issues but capable of mitigation.	Adequate or good access off adequate or good standard of road. Not affected by safety issues.

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Accessibility to facilities	<p><i>Access to facilities:</i> GP Surgery Primary School Shop</p> <p><i>Access to public transport:</i> Bus stop or route Train station</p>	Actual distances to facilities can be measured to identify the relative sustainability of sites. If the Council identifies a pool of sites, it could use accessibility criteria to select the most sustainable site options to meet its defined needs in the first five years.		
Noise and Air Quality	Noise or air pollution from adjacent uses e.g. road, rail and air transport	Likely to be adversely affected by noise or air pollution from adjacent uses leading to an unacceptable residential environment.	Likely to be affected by noise or air pollution but this is capable of mitigation.	Not affected by noise or air issues.
Residential Amenity (Impact of site and adjoining uses on each other)	Relationship with existing adjacent uses	Close proximity to existing adjacent uses e.g. residential properties where any potential impact (light, visual, noise, traffic) on adjoining uses is not reasonably capable of mitigation.	Close proximity to existing adjacent uses especially residential properties but any potential impact (light, visual, other disturbance) on adjoining uses is capable of mitigation.	Unlikely to adversely affect existing adjoining uses.
Achievability	Deliverable/ Viable	Site constraints or ownership issues that are unlikely to be capable of resolution without considerable expense.	Site constraints capable of being overcome but where extent and cost of mitigation are unclear at this stage.	In a location where housing development is not contrary to spatial policy. No site constraints needing to be overcome.

Capacity

3.18 Following the Part 1 and Part 2 Assessment, a list of sites was identified as potentially suitable for development to provide Gypsy and Traveller pitches. All potentially suitable sites were also then subject to a broad capacity assessment of the number of pitches which could be appropriately provided on site. In this assessment of capacity, account was taken of:

- Designing Gypsy and Traveller Sites: Good Practice Guide (Now withdrawn CLG, 2008); and
- Any relevant planning history.

3.19 The capacity assessment also built upon DLP's first-hand experience and understanding of the variety of pitch and plot sizes that exist across the country, covering various forms of Gypsy and Traveller development, including for both residential and transit sites. This has been used to inform the theoretical capacity of sites and optimum size and configuration of pitches on site. On larger sites, a mix of pitch sizes can be assumed to reflect the needs of different families.

3.20 The potential site capacities also took account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures (including access arrangements) required to achieve a suitable development. This should result in sufficient access and accommodation space to create a site which Gypsy and Travellers find attractive, at the same time, sufficient space and landscaping will help to preserve the residential amenity of neighbouring uses.

4.0 SITE ASSESSMENT AND CAPACITY

4.1 The Part 1 Assessment involved reviewing 51 sites identified from the various sources of sites (paragraph 3.3). The number of sites from each source is set out in Table 5 below.

Table 5 Site Sources

Site Sources	No. of Sites
Existing Gypsy and Traveller Sites	8
Existing Travelling Showpeople Sites	0
Unauthorised Sites and those with a previous planning history (including Tolerated Trespass Sites)	7
Call for Sites	12
Council owned land	24
SHLAA Sites	0
Total	51

Part 1 Suitability and Availability Matrix

4.2 The initial assessment of site suitability and availability is summarised in a matrix which is included in Appendix B. As set out in the method a traffic light approach has been utilised to identify where sites do not satisfy the criteria in red, where the criteria may be capable of being satisfied in yellow and where the criteria are satisfied in green.

4.3 Sites subject to a 'red' outcome within the matrix did not progress to be assessed in Part 2. 17 sites were rejected in Part 1 and therefore 34 sites were taken forward to be examined further in Part 2.

Part 2 Suitability, Availability and Achievability Site Assessments

- 4.4 The Part 2 Assessment involved a more detailed consideration of suitability, availability and an examination of achievability issues. At this stage all sites that were not rejected in Part 1 were visited by the project team. Following these site visits, those determined as continuing to have potential were subject to full write-ups and circulated to obtain detailed comments from specialist officers; with proforma write-ups provided in Appendices D and E.
- 4.5 Appendix C sets out those sites where it was considered, subsequent to Part 1 assessment or a site visit under Part 2, that there is no potential for the sites to accommodate further traveller accommodation and the reasons for those decisions. Appendix D sets out the detailed site assessments for those sites considered potentially suitable, available and achievable for future provision, whilst full write ups of those sites which were rejected in Part 2 of the Assessment after further detailed consideration and consultation with specialist officers have also been included within Appendix E.

Potential Gypsy and Traveller sites

- 4.6 A total of 7 sites were identified as potentially available and suitable to contribute additional pitches towards meeting future identified needs for permanent accommodation for Gypsies and Travellers (Table 6). 1 site was also considered potentially suitable for use as a potential Transit site or relocated Toleration site (Table 7).

Table 6 Potential Gypsy and Traveller sites

Local Authority	Site No.	Site Name	Existing Pitches (Inc. unimplemented permissions)	Potential Additional Pitches
Torridge District Council	NDT01	The Heights, Staddon Rd Holsworthy, EX22 6NJ	1	1
Torridge District Council	NDT03	Wonford Park Farm, Holsworthy, EX22 7DT	1	1

North Devon District Council	NDT05	Woodpark Copse, West Yeo, Witheridge, EX16 8PY	1	1
Torridge District Council	NDT10	Land at OS 3059 Holsworthy Beacon	1	1
North Devon District Council	NDT44	Land at Garland Cross, Kings Nympton, Umberleigh, Devon, EX37 9TT	1 (temporary)	1
Torridge District Council	NDT46	Land at Loxdown Woods, Loxdown Road	0	2
Torridge District Council	NDT49	Land North of Staddon Road, Holsworthy	0	2

Table 7 Potential Transit site or relocated Toleration site

Local Authority	Site No.	Site Name	Existing Pitches (Inc. unimplemented permissions)	Potential Additional Pitches
North Devon District Council	NDT13	Seven Brethren	1 (toleration site)	Transit

4.7 Further details of the individual potential sites are set out in Appendix D and they are considered further in Section 5.

5.0 RECOMMENDATIONS AND DELIVERY OPTIONS

Pitch and Plot Targets

- 5.1 PPTS (CLG, August 2015) requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, to meet likely permanent and transit site accommodation needs arising in each area.
- 5.2 As set out in Chapter 2, Table 2, the Devon Partnership GTAA 2015 identifies the overall pitches required for Gypsies and Traveller accommodation. This has been estimated at an additional 6 pitches for North Devon and additional 9 pitches for Torridge to be delivered by 2034. In North Devon, this included a need for 3 additional pitches within the first 5 years (2014-2019) and for Torridge 6 additional pitches within the same timeframe.

A Supply of Deliverable and Developable Sites

- 5.3 In developing the Traveller Site Allocations DPD, PPTS (CLG, August 2015) requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites sufficient to provide five years' worth of sites against those locally set targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.
- 5.4 It is recommended that the Councils should use a priority approach to safeguarding and allocation of potentially suitable sites. DLP recommend that the Councils meet their need for Gypsy and Traveller provision in the following order:
- Safeguard existing sites to prevent their loss to other uses and increase the identified pitch requirement for the Districts;
 - Continue to monitor new permission for G&T use;
 - Allocate existing sites for intensification, formalise temporary/tolerated pitches on a permanent basis; and
 - Allocate new sites/pitches.

5.5 DLP consider that the distribution and delivery of provision across the Districts is important and therefore the selection of site options by the Councils should also be guided by the following principles;

- Fit with needs: e.g. location of current needs, existing provision and needs of different travelling communities;
- Viability and timing of delivery of sites: e.g. financial viability, provision of other policy requirements such as affordable housing and delivery within the first 5 years; and
- How potential sites relate to spatial strategies: e.g. settlement hierarchy, relationship of sites to sustainable settlements and accessibility to key services.

5.6 The fit with needs is an important consideration. Unlike the housing market, the small-scale nature of need and supply can in some instances mean that the consideration of a specific family's needs is required, including an understanding of the form and location of what is required to meet those needs. DLP are aware of local authorities where specific needs remain unmet, whilst sites remain vacant because the sites provided are inappropriate to meet specific needs. DLP recommend that the provision of pitches and plots for Gypsies and Travellers sites should be managed to ensure a good fit with identified need and to enable delivery.

5.7 The relative accessibility of sites and proximity to the main towns, villages and key services should be considered by the Councils when selecting sites. The level of provision for Gypsy and Traveller pitches over the plan period is small compared to the level of provision for other uses such as residential, but the Councils should still plan for sustainable development where possible.

Safeguarding Existing Sites

5.8 It is suggested that, initially, the Councils should consider safeguarding existing Gypsy and Traveller sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch and plot targets.

5.9 There are 6 existing Gypsy and Traveller sites with full permissions (including personal) for permanent traveller pitches within North Devon and Torridge. It is recommended that these sites are safeguarded in the emerging Traveller Site Allocations DPD to ensure their continued use.

Table 8 Safeguarding Existing Authorised Gypsy and Traveller Sites

Site ref	Site Name	Local Authority	Existing Pitches
NDT01	The Heights, Holsworthy, EX22 6NJ	Torridge	1
NDT04	The Holly, Rydon Lane, Holsworthy, EX22 7HY	Torridge	1
NDT05	Woodpark Copse, West Yeo, Witheridge, EX16 8PY	North Devon	1
NDT06	Rock Hill Caravan Queens Nympton South Molton, EX36 4LE	North Devon	1
NDT07	Old Repeater Station Bommerton Cross Molland South Molton, EX36 3PN	North Devon	1
NDT10	Land at OS 3059 Holsworthy Beacon	Torridge	1

5.10 From the site survey, it is clear that these sites are currently in use and are occupied. There appears to be no reasons why these sites should not be safeguarded in the North Devon and Torridge Traveller Site Allocations DPD. Safeguarding the sites listed in Table 8 will prevent their loss to other uses and therefore ensure that new site provision is only required to meet future needs.

Continue to monitor new permissions for traveller use

5.11 Since the GTAA base date in 2014, 1 pitch has been granted full permission in North Devon. Table 9 below sets out the site details:

Table 9 Permitted sites Since GTAA Base Date (2014)

Site ref	Site Name	Local Authority	Existing Pitches
NDT07	Old Repeater Station, Bommerton Cross, Molland South, EX36 3PN	North Devon	1

5.12 North Devon District Council and Torridge District Council should continue to monitor permissions against the GTAA targets and safeguard sites (as above) for all permanent permitted sites when the Gypsy and Traveller DPD is progressed.

Allocate existing sites for intensification (additional pitches), formalise temporary/tolerated pitches on a permanent basis and allocate new sites/pitches

5.13 The allocation of sites for pitches is the primary way that the Councils can meet defined pitches needs. This can take a variety of forms, including the provision of additional pitches on existing authorised sites, the formalisation of suitable temporary/tolerated pitches on a permanent basis and the allocation of potential new sites to provide pitches.

5.14 To deliver sites with potential there are a variety of different delivery options. To support delivery of sites identified by the study as potentially suitable and available, DLP Planning have identified the most suitable option to bring sites forward. These include:

- **Delivery model 1:** Existing privately-owned (authorised/temporary/tolerated) sites where there is potential for additional pitches to be created within the existing site boundaries to meet future immediate family needs or temporary or tolerated pitches that can be formalised on a permanent basis. Under this model, planning permission and sufficient funds to implement the scheme would be needed by the applicant. The Councils should consider encouraging planning applications to meet short and medium term needs through entering into dialogue with site occupants.
- **Delivery model 2:** Sites which are not currently owned by the travelling communities but have been identified as available for this use. Allocation in the emerging Traveller Site Allocations DPD could identify these sites to travelling communities and they could be purchased on the open market. Alternatively, the Councils could consider using capital monies to buy the site and then make them available to organised groups, registered providers or gypsy and traveller families on a non-profit making basis to enable them to develop and manage them.
- **Delivery model 3:** New transit provision and new public sites where the Councils consider that additional affordable pitch provision may be appropriate. In this case, the Councils should investigate the potential for either buying sites, developing their public assets or working with other public providers using Government grant funding or other monies to secure or increase affordable

provision. Sites could then either be managed by a Council or a Registered Provider (RP).

5.15 A total of 7 sites have been identified as potentially available and suitable to be developed to provide further permanent residential accommodation for Gypsies and Travellers. Table 10 sets out the sites with potential for allocation. Full details of these sites are contained in Appendix D.

Table 10 Sites with Potential for Gypsy and Travellers

Site Ref	Site Name	Existing permanent pitches	Additional permanent pitches	Pitches 2019 2024	Pitches 2024 2029	Delivery option
NDT01	The Heights, Staddon Rd Holsworthy, Torridge EX22 6NJ	1	1 (existing unimplemented permission)	1	0	Model 1 private site
NDT03	Wonford Park Farm, Holsworthy, Torridge EX22 7DT	1 (temporary)	1	1	0	Model 1 private site
NDT05	Woodpark Copse, West Yeo, Witheridge, North Devon EX16 8PY	1	1	1	0	Model 1 private site
NDT10	Land at OS 3059 Holsworthy Beacon, Torridge	1	1	0	1	Model 1 private site
NDT44	Land at Garland Cross, Kings Nympton, Umberleigh, North Devon EX37 9TT	1 (temporary)	1	1	0	Model 1 private site
NDT46	Land at Loxdown Woods, Loxdown Road, Torridge	0	2	2	0	Model 1 private site
NDT49	Land north of Staddon Road, Holsworthy, Torridge	0	2	2	0	Model 1 private site

- 5.16 The study has identified 7 potential sites for Gypsy and Traveller use with capacity to provide up to 9 additional permanent pitches, including 8 additional permanent pitches in the first 5 years.
- 5.17 In terms of meeting the need across Torridge and North Devon, there are 5 potential sites in Torridge with a capacity to provide 7 additional pitches (6 in the first 5 years) and 2 potential sites in North Devon with a capacity to provide up to 2 additional pitches (both in the first 5 years).

Potential Transit Site

- 5.18 The study has also identified potential for a transit site in Barnstaple. The site could be designed and provided as part of the redevelopment of the Seven Brethren existing toleration site to address the need for transit provision along the A361/A39.

Table 11 Site with potential for Transit provision

Site Ref	Site Name	Existing permanent pitches	Additional pitches	Pitches 2018 2023	Pitches 2023 2028	Delivery option
NDT13	Seven Brethren (Toleration Site)	0	4/5	0	4/5	Model 3 public

Meeting the Needs

- 5.19 The following paragraphs and tables (overleaf) compare the supply of potentially suitable and available sites against the identified pitch and plot needs in the GTAA. The comparison shows the need in 5-year time periods to set out potential shortfalls over the Local Plan timescale to 2034, including the current 5 year land supply position for 2019-2024.

Table 12 Gypsy and Traveller need and potential supply in 5-year time periods

	2014 2019	2019 2024	2024 2029	2029 2034	Total
(a) Need for Gypsy and Traveller Residential Pitches	8	2	2	2	14
<i>North Devon</i>	2	1	1	1	5
<i>Torridge</i>	6	1	1	1	9
(b) Permitted Sites at 1st Jan 2019	1	-	-	-	1
(c) Backlog of Need to Carry forward (a-b)	7	-	-	-	-
<i>North Devon</i>	1	-	-	-	-
<i>Torridge</i>	6	-	-	-	-
(d) Need for Gypsy and Traveller Residential Pitches Plus Backlog Carried Forward into years 2019-2024 (a-b+c)	-	9	2	2	13
<i>North Devon</i>	-	2	1	1	4
<i>Torridge</i>	-	7	1	1	9
(e) Pitches on existing sites with potential	-	4	1	0	5
<i>North Devon</i>	-	2	0	0	2
<i>Torridge</i>	-	2	1	0	3
(f) Pitches on new sites with potential	-	4	0	0	4
<i>North Devon</i>	-	0	0	0	0
<i>Torridge</i>	-	4	0	0	4
(g) Total Potential Supply (e+f)	-	8	1	0	9
<i>North Devon</i>	-	2	0	0	2
<i>Torridge</i>	-	6	1	0	7
(h) Net Outstanding Need (d-g)	-	1	1	2	4
<i>North Devon</i>	-	0	1	1	2
<i>Torridge</i>	-	1	0	1	2

5.20 DLP consider that there are potentially 7 sites which may be suitable for up to 9 Gypsy and Traveller pitches. Overall this is 4 pitches short of the identified need figure for 2014-2034 and 1 pitch short of a 5 year land supply (for the period 2019-2024) due to the backlog of need since the GTAA base date in 2014.

Proposed Policy Approach

5.21 As it stands the assessment identifies insufficient sites to meet the needs for Gypsy and Traveller pitches to illustrate a 5 year land supply compared to defined GTAA

needs (including the existing backlog). The inability to demonstrate a five year supply of pitches would potentially introduce a risk that the Travellers Site Allocations DPD could be found unsound at examination, or at the very least there would be a requirement to undertake additional work to address the issue. It is therefore recommended that any such DPD should not proceed to examination, until the Councils can demonstrate that every reasonable endeavour has been made to identify and review all potential site opportunities.

5.22 To proceed with the Traveller Site Allocations DPD to examination it is likely that the Councils will need to include additional sites with potential to meet the overall pitch need (14 pitches) and two transit sites, and allow sufficient flexibility on the timing of delivery of specific sites. This latter point prevents unforeseen issues undermining the Councils' 5 year land supply position(s). In the first instance DLP Planning would suggest the following:

- *Further investigation of site availability* – The study has confirmed the availability of numerous sites (See appendices B, C, D and E), but not all identified sites have been confirmed as available to allow potentially suitable pitches to be considered deliverable in the first 5 years. The Council could target specific sites to confirm availability.
- *Reconsideration of site suitability* – The study has obtained stakeholder input on a variety of technical matters to reach conclusions on the site's suitability. In instances where site unsuitability relates to a sole reason e.g. transport or landscape, the Council could re-consider site suitability or identify adequate mitigation measures to make them more acceptable and following this more marginal sites may be acceptable to the Councils.

5.23 The assessment has incorporated considerable technical work to review potential site sources, including further sites from more recent consultation exercises and made concerted efforts to identify publically owned sites for consideration. It is considered that without sufficient suitable and available sites the Councils are faced with 2 choices regarding the future delivery of the Traveller Site Allocations DPD, including:

- Delaying the Traveller Site Allocations DPD to undertake further work; or

- Proceeding without sufficient identified sites in the Traveller Site Allocations DPD and setting out additional policy, funding and delivery mechanisms to illustrate delivery.

5.24 It is not for DLP to make this decision for the Councils, but the following observations are set out to help inform the Councils' consideration of this difficult issue.

Delaying the Traveller Site Allocations DPD

5.25 The Councils appear to have a strong commitment to meeting the needs of the travelling community. Delaying the Traveller Site Allocations DPD to undertake further work may identify further specific sites, however DLP are of the view that a comprehensive review of all likely sources of sites has been completed and therefore would question what further work could be undertaken (beyond the two points suggested in para 5.22) or if additional sites would be forthcoming in the short term.

Proceeding with the Traveller Site Allocations DPD at risk

5.26 It must be stressed that proceeding without a sufficient supply of sites could pose a significant risk to the achievement of a successful examination. However, in the absence of any likelihood of identifying further site options to address the identified need, and in the context of both limited private Gypsy and Traveller market activity and historical lack of development plan provision, the progression of the DPD could be seen as pragmatic option.

5.27 However, if the Councils were to proceed on this basis DLP would suggest that it may not be appropriate to be solely reliant on the existing criteria-based policy to delivery sites and overcome the lack of identified sites in the first 5 years. DLP recommend further consideration of the following additional policy options:

- Cross boundary working;
- Council Commitment to help the travelling community with funding and delivery; and
- Revised planning policy.

Cross boundary working

5.28 The Councils have a duty to co-operate with adjacent authorities and, given the difficulty identifying sites for Gypsy and Traveller use across the Country, Councils are encouraged to work with neighbouring local authorities to potentially co-operate on the provision of Gypsy and Traveller sites. DLP consider it positive that North Devon and

Torridge Councils are working together to consider Gypsy and Traveller Site provision across their districts.

- 5.29 DLP would encourage the Councils to also work with other neighbouring local authorities to potentially co-operate on the provision of both permanent Gypsy and Traveller sites and transit sites.
- 5.30 The needs of Gypsies and Travellers do not stop at local authority boundaries and the potential for the delivery of all types of sites (especially public sites) should be explored across these boundaries through the Duty to Cooperate, where appropriate.
- 5.31 The duty to co-operate is not the duty to accept, so adjacent authorities will have to be satisfied that the Councils have undertaken robust assessments of both needs and sites to ensure they are not unnecessarily aiding any local authority to avoid providing sites within its own area. Crucially, the very definition of the travelling community, would suggest that this planning use is in fact very cross boundary in nature. If the Duty-to-cooperate is to be used to facilitate delivery outside of a local planning authority's geography, it is important to ensure that there is a legitimacy in doing so and there can be no suggestion that it is on the basis of convenience or political sensitivity to the issue.

Funding

- 5.32 The Government have adopted a range of mechanisms to boost the supply of housing, including the provision of accommodation for travellers. PPTS (CLG, August 2015) identified several potential sources of funding for local authorities.
- 5.33 Firstly, the New Homes Bonus scheme which operates in the same way for traveller sites as for other forms of housing. Namely, for every new pitch, a local planning authority will get six years of matched Council Tax funding, with an extra supplement for affordable pitches (such as sites owned or managed by local authorities and Registered Providers).
- 5.34 Secondly, the Homes and Communities Agency (HCA) (now Homes England) allocated £1.7bn, as part of its National Affordable Housing Programme for 2015-18, to fund the provision of affordable housing, including affordable traveller pitch provision. The HCA has launched its prospectus inviting housing associations, councils, developers and others to bid for a share of grant funding for delivery of new affordable

housing outside London. Bids will only be accepted for the provision of new traveller pitches and as with other types of accommodation, the Government does not expect to receive bids for schemes on Green Belt land or other land with special environmental protections.

- 5.35 A proportion of the £1.7bn funding will be retained for future bids through ongoing Market Engagement. This will allow organisations to take the longer timeframes they need to submit funding bids where schemes had not been fully worked up by 30 April 2014 when the formal bid round closed. The Homes England website confirms that bidding for further allocations will reopen for continuous market engagement in due course. The Homes England approach will encourage bidders to bring forward a higher proportion of firm and realistically deliverable schemes at the outset as it will allow them the flexibility to respond to development opportunities as these arise.
- 5.36 Thirdly, the introduction of the Community Infrastructure Levy (CIL) could provide a further potential funding source for enabling works (including supporting infrastructure) required to deliver Council priorities, should the Councils choose to introduce CILs for the North Devon and Torridge areas.
- 5.37 Torridge District Council has allocated £600,000 as part of its Capital Programme in order to facilitate the delivery of traveller accommodation to meet identified needs (particularly the provision of transit accommodation / emergency stopping places).
- 5.38 North Devon Council do not currently have funds allocated for the provision of traveller accommodation in the capital programme (however the Council will obviously have to consider doing so in the future if it is necessary to provide sites).

Site Allocations DPD Planning Policy

- 5.39 To meet any unidentified need through the plan period and to provide a base for considering planning applications, the future Traveller Site Allocations DPD will need to include site allocations.
- 5.40 DLP welcomes that Policy ST20 of the adopted Joint Local Plan safeguards all existing sites and incorporates pitch targets as set out in the GTAA for both permanent pitches and transit provision. We also welcome the permissive approach of Policy DM30 of the North Devon and Torridge Local Plan that currently provides a criteria-based policy for making decisions on future Gypsy and Traveller applications (both on future

allocations and unallocated site). DLP recommends that further planning policy in the emerging North Devon and Torridge Traveller Site Allocations DPD includes the:

- Allocation of potential sites.

Transit Site Provision

- 5.41 A transit site is a permanent facility on which stopping is only allowed for short periods typically up to 28 days, but it can be up to 3 months, with basic facilities provided. There are currently no authorised transit sites in North Devon or Torridge to which occupiers of unauthorised encampments could be directed. The GTAA identifies a need for further transit provision and/or emergency stopping places within the Devon Partnership study area. According to the study this should include 4-5 additional transit sites and/or emergency stopping places containing 4-5 pitches. The most appropriate locations for these sites are suggested to follow where unauthorised encampments are most likely to occur. Whilst the GTAA did not demonstrate a specific need in North Devon and Torridge the adopted joint Local Plan includes strategic policy ST20: Providing Homes for Traveller Communities, which requires the provision of 2 transit sites in the Northern Devon, each providing accommodation for 4 or 5 pitches.
- 5.42 The assessment has identified one site where delivery is potentially suitable, available and deliverable in the 5 to 10 year time frame after flood defence improvements have been completed. This site (Seven Brethren) currently acts as the toleration site within North Devon. The site is therefore considered suitable with regard to its potential for allocation as a transit site through the North Devon and Torridge Traveller Site Allocations DPD.
- 5.43 Having identified one potential site for transit provision, there remains an unmet policy requirement for a further site. This is problematic as the result of an unmet policy requirement may be, as is currently the case, the use of unauthorised encampments. There are a number of approaches that North Devon and Torridge Councils could take to unauthorised encampments in lieu of transit site provision, including:
- Monitor the use of unauthorised sites and the use of the transit site (when it becomes available), in order to establish the need for the second transit site in the Northern Devon area;
 - Providing emerging stopping places;

- Considering greater use of tolerated trespassing; and
- Negotiated Stopping.

5.44 Of the above approaches, given the context, the use of negotiated stopping is considered the most suitable and further details are set out below.

Negotiated Stopping

5.45 'Negotiated stopping' is a method for approaching the issue of unauthorised encampments used in transit, that has been demonstrated as a workable solution for Leeds City Council and is adopted policy in their Core Strategy 2014. Negotiated stopping is an arrangement that comprises of a mutual agreement made between the Local Authority, and the Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary according to the situation and context, and would likely include matters relating to:

- Provision and use of services by the council, such as portaloos, waste disposal and water;
- Behaviour agreements such as noise, waste disposal, and damage;
- The length of the agreement (typically 28 days but can be shorter, and up to three months);
- Direction to more suitable public land if necessary; and
- The consequences of behaviour agreement breaches, including the option of the Local Authority to use possession orders against individuals/one family (rather than the whole group).

5.46 The benefits of this approach were assessed by DeMontford University following the implementation of the negotiated stopping policy in Leeds. The findings identified are²;

- Improved quality of life for Gypsy and Traveller communities, by living free from harassment and threat of eviction;

² <https://www.negotiatedstopping.co.uk/> accessed 12/02/2019

- Better community cohesion between the Gypsy and Traveller group, the local resident community, and the Local Authority; and
- Combined time and cost savings for the Local Authority and police on eviction and clean-up costs.

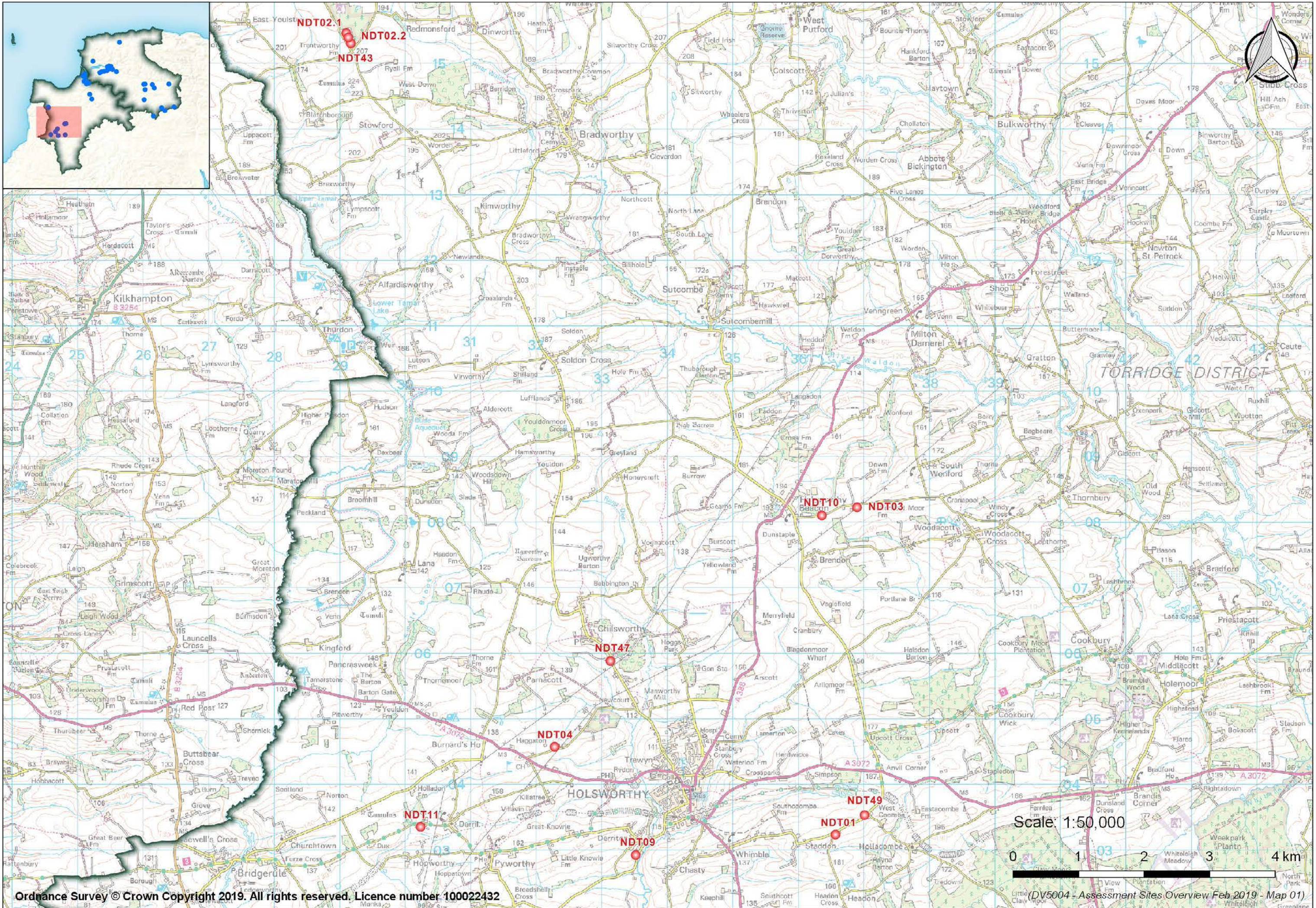
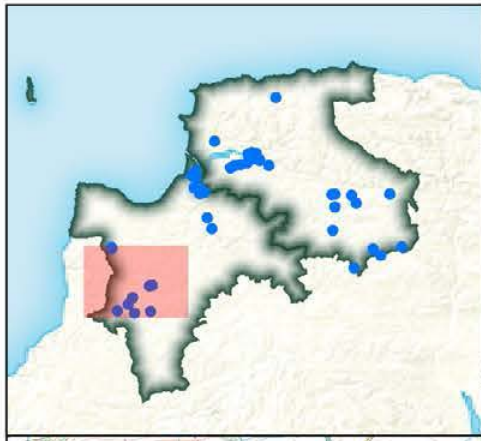
5.47 The negotiated stopping approach is considered an appropriate approach for North Devon and Torridge to investigate further, as the nature of unauthorised encampments in the area are considered to be irregular in their arrival timing, and for relatively short periods of time. Owing to the lack of additional suitable and available sites for additional transit sites for allocation, the negotiated stopping approach avoids the need for identifying permanent facilities and offers a more flexible approach that can be tailored to the sporadic nature of the unauthorised stopping currently seen within the districts. Together with the 'push' of recent legislation providing greater enforcement powers to local authorities to deal with unauthorised encampments, and the 'pull' of the agreement of facility provision without the threat of eviction, this could provide the Councils with the ability to better manage the location and the behaviour of stopping in a collaborative manner. This approach, based on the policy adoption and experience of Leeds City Council, and currently being investigated by the Greater London Authority, is recommended for consideration by North Devon and Torridge District Councils.

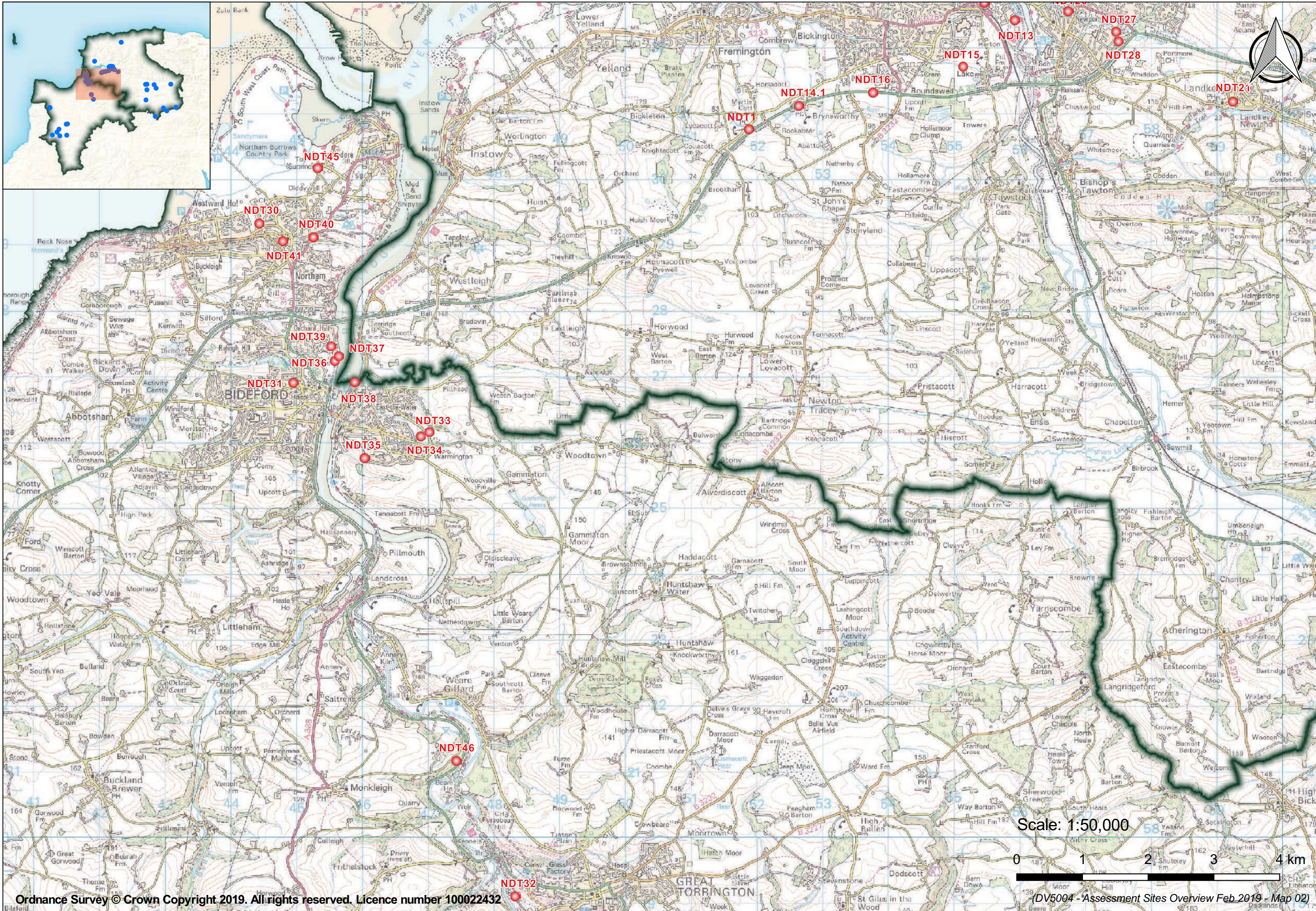
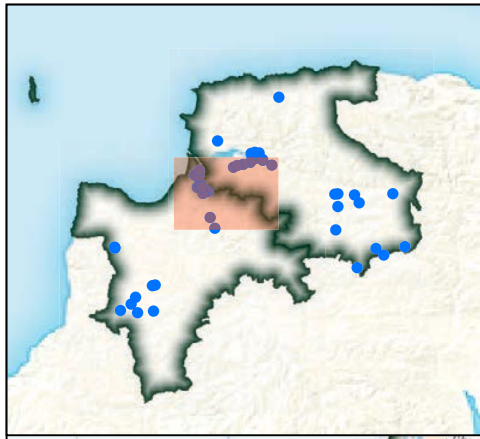
Phasing and Monitoring

- 5.48 As with other forms of development, the release of Gypsy and Traveller sites should be managed to ensure that it corresponds with identified need.
- 5.49 Once the Councils have identified and allocated enough sites, active monitoring of supply against need on an annual basis, as required by PPTS (CLG, August 2015), would determine the need for any potential release of land to meet future needs. To ensure that they are able to demonstrate that they have an up to date understanding of local needs, the Councils should also undertake periodic review of their needs evidence base through the preparation of an updated GTAA.

6.0 APPENDICES

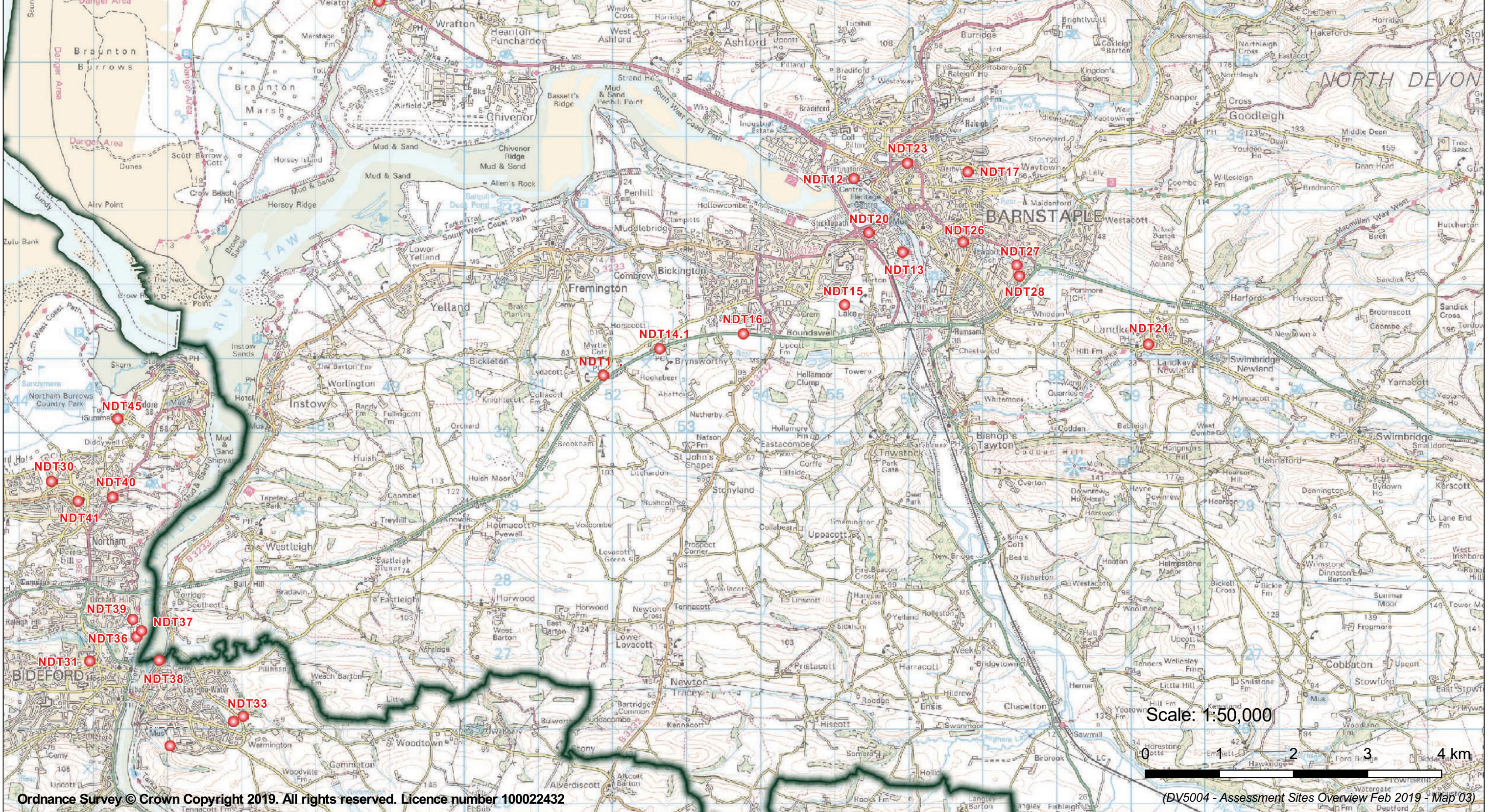
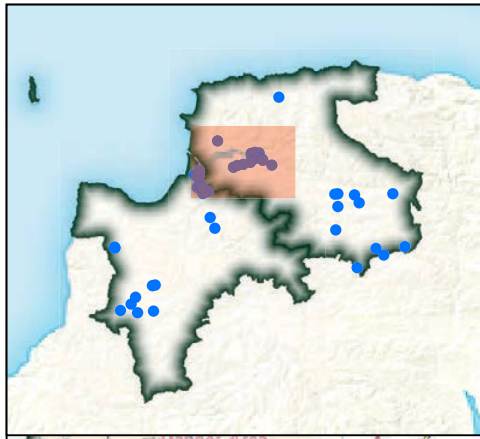
APPENDIX A: SITE LOCATION PLANS

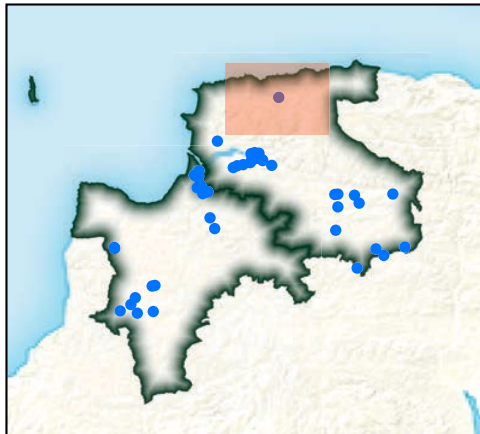




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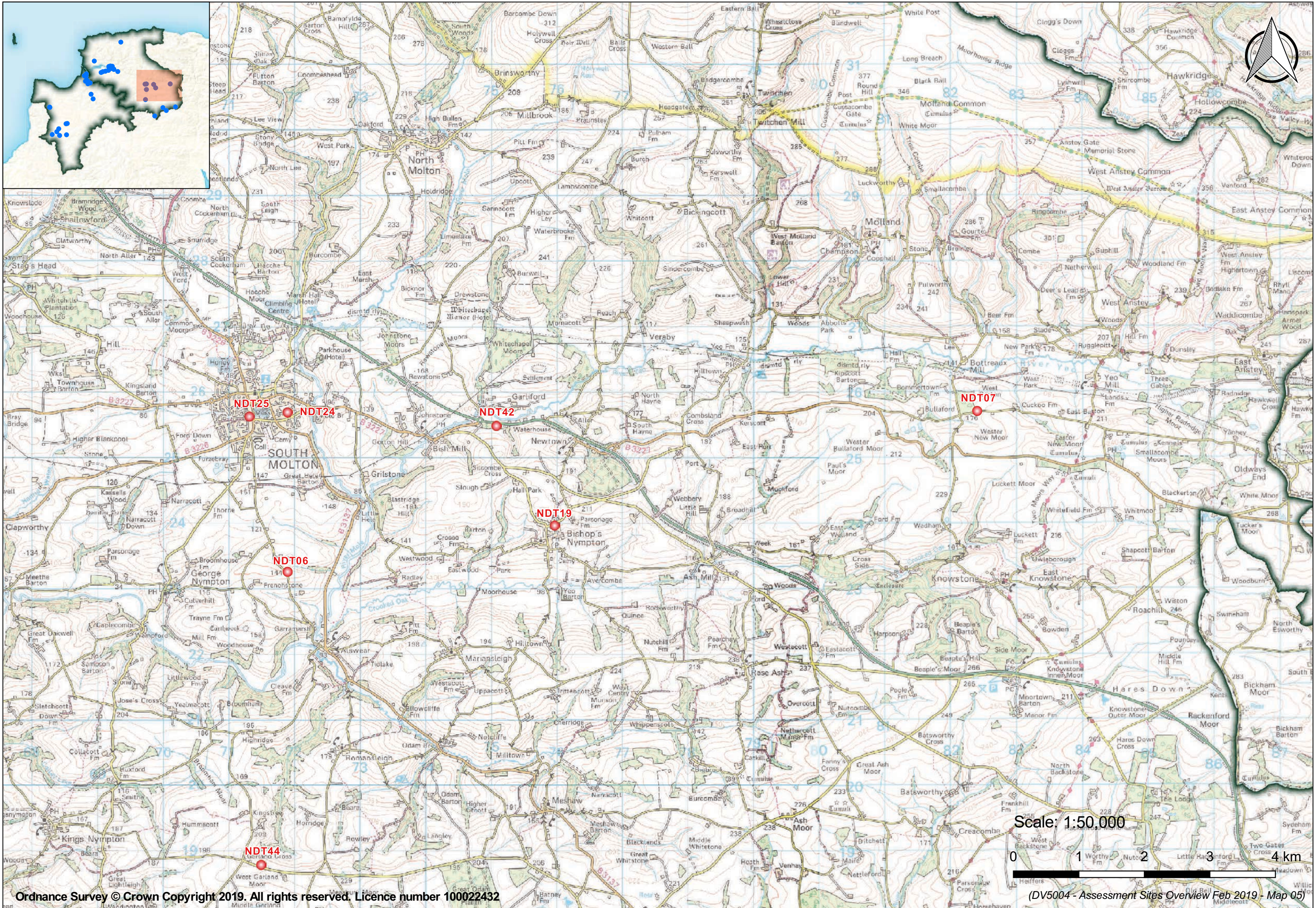
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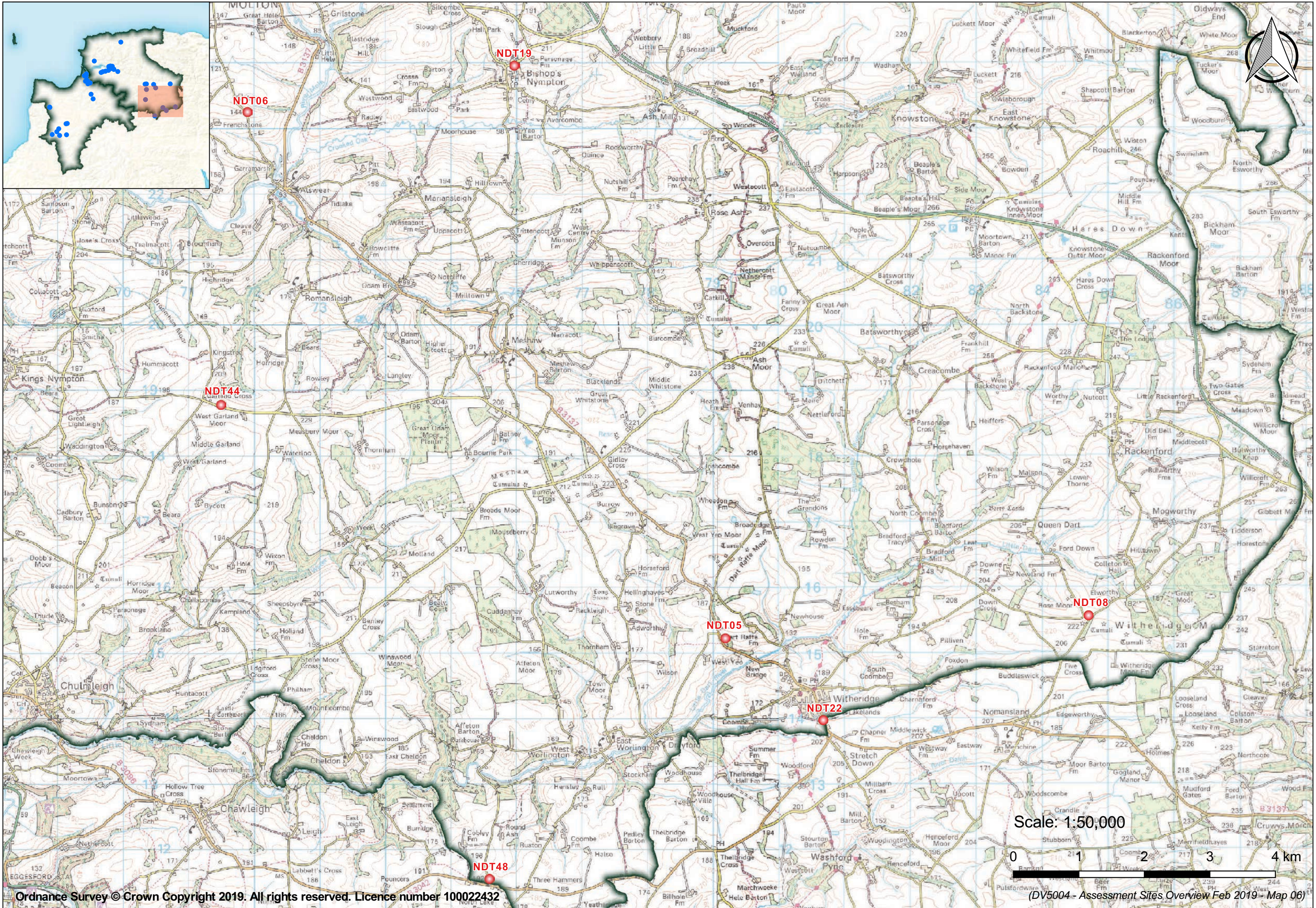




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APPENDIX B: PART 1 ASSESSMENT MATRIX

APPENDIX C: REJECTED SITES LIST

Appendix C: Rejected Sites List

Site Ref	Site Name/Address	Stage Rejected	Reason for Rejection
NDT02.1	Northern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB	Part 2	This site is currently considered unsuitable based on its landscape impact. According to the Landscape Appraisal development in this location would constitute a clear and evident incursion into this deeply rural area and detracts from its natural character and the sense of remoteness. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT02.2	Little Rainbows End, Bradworthy, Holsworthy, EX22 7SB	Part 2	This site is currently considered unsuitable based on its landscape impact. According to the Landscape Appraisal development in this location would constitute a clear and evident incursion into this deeply rural area and detracts from its natural character and the sense of remoteness. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT04	The Holly, Rydon Lane, Holsworthy, EX22 7HY	Part 2	The site is an existing gypsy and traveller site. Given the size and site constraints, the site was rejected in the Part 2 Assessment as having no capacity for intensification to deliver further gypsy and traveller pitches.
NDT06	Rock Hill Caravan, Queens Nympton, South Molton, EX364LE	Part 2	The site is an existing gypsy and traveller site. Given the size and site constraints, the site was rejected in the Part 2 Assessment as having no capacity for intensification to deliver further gypsy and traveller pitches.
NDT07	Old Repeater Station Bommerton Cross Molland South Molton Devon EX36 3PN	Part 2	The site is an existing gypsy and traveller site. Given the size and site constraints, the site was rejected in the Part 2 Assessment as having no capacity for intensification to deliver further gypsy and traveller pitches.
NDT08	Site at Elworthy Cross, Witheridge	Part 2	This site has in the past been subject to enforcement relating to its unauthorised use as a transit site, it has therefore been identified for further consideration. Whilst traffic movements in the area were light and speeds were low, the County Council's Highways Officers were concerned about an increase in traffic movements from the existing access, which is effectively on the cross roads. The limited size of the site is also considered a significant constraint. The site was therefore rejected in the Part 2

			Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT09	Former Derriton Quarry Holsworthy Devon EX22 6SX	Part 2	The site had previously been granted planning permission for Gypsy and Traveller Use, which was not implemented. The land is now privately owned and therefore as the availability of the site for gypsy and traveller pitches has not been confirmed the site was rejected in Part 2.
NDT11	Foxcote Stables Caravan, Derril, Pyworthy, Holsworthy, Devon Road from Dux Cross to Derrill Cross	Part 2	Following further consultation, it became apparent that the owner of the site (who had previously submitted the site as suitable for Gypsy and Traveller pitches through the Call for Sites process), had since sold the site on. The new owners will be using the land for the rearing of a rare breed of sheep, who will only be making use of permitted development rights to reside on site seasonally to support lambing. As such the site should be considered no longer available for Gypsy and Traveller use.
NDT12	The former Gliddon and Squires site and the Mill Road Depot	Part 1	The site is located in an area of flood risk (Zone 3a and b) and was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of gypsy and traveller use.
NDT14.1	Disused lay-by south of the A39	Part 2	Based on the comments received from the County Council's Highways Officers, this site is not considered suitable for Transit provision based on the access constraints and potential impact on highway safety. The site is also not considered to be available for Gypsy and Traveller Use. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT14.2	Disused lay-by north of the A39	Part 2	Following later confirmation from the County Council the site is also not considered to be available for Gypsy and Traveller Use. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT15	Larkbear development . (See Policy BAR02) with access off the Old Torrington Road.	Part 2	The site is in private ownership. As the availability of the site for Gypsy and Traveller pitches has not been confirmed the site was rejected in Part 2 of the Study.
NDT16	Part of designated Park and Change facility at Roundswell.	Part 2	This site was put forward by Barnstaple Town Council through the Call for Sites process, the availability of the site was therefore uncertain. The site has been allocated in the emerging Local Plan (see Policy BAR10: Roundswell Business Park) as a high-quality business campus, in addition to a park and change facility. Given the progress of the Plan, DLP would suggest the site is unlikely to be available or

			amended as an allocation to include Transit use. The site was therefore rejected in Part 2 of the Study.
ND17	Land between 4-5 & 12-13 Chipmunk Walk, Barnstaple, EX32 7JA	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT18	Land at Pill Gardens, Braunton, EX32 2BE	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT19	Land off Parsonage Hill, Bishops Nympton, EX36 4PT	Part 2	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. The northern and southern section of the site are occupied by two ranks of garages which looked to be still be in use. Given the shape (narrowing in the centre) and size of the site, this would be split into separate small plots. This alongside the potential residential amenity issues associated with the adjacent properties, meant the site was rejected in Part 2 as unsuitable for Gypsy and Traveller pitches.
NDT20	Land adj. Clifton & Signal Terrace, Barnstaple, EX31 2BA	Part 1	The site is located in an area of flood risk (Zone 3a and b) and was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of gypsy and traveller use.
NDT21	Car Park at Rear of Church Lane, Landkey, EX32 0JS	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT22	Former Allotments, Witheridge, EX16 8AW	Part 1	The site looks to be still in use as allotments and therefore has questionable availability. There are also concerns relating to the size of the site and residential amenity in terms of the adjacent dwellings. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.

NDT23	Coronation Street Car Park, Barnstaple, EX32 7AY	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT24	Land at end of Dart Park, South Molton, EX36 4BJ	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT25	Land at Cooks Cross, South Molton, EX36 4AW	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT26	Land at Town Walk, Victoria Street, Barnstaple, EX32 9JE	Part 1	The site is located in an area of flood risk (Zone 3a and b) and is therefore unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use. Given the limited size of the site it is also not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT27	Land between 9 & 10 The Pollards, Barnstaple, EX32 9JQ	Part 1	The site is located in an area of flood risk (Zone 3a and b) and is therefore unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use. Given the limited size of the site it is also not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT28	Land off Cherry Arbour, Barnstaple, EX32 9JQ	Part 1	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the limited size of the site it is not considered suitable to deliver the necessary land, amenity space and landscape mitigation appropriate for a single pitch. The site was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches.
NDT29	Harvest Farm, Kentisbury, Barnstaple, Devon, EX31 4NU	Part 2	This site was put forward through the Call for Sites and therefore available and considered suitable for further consideration in Part 2. The site has been rejected as

			unsuitable due to highway and landscape constraints.
NDT30	Woodbine Meadow, Northam, EX39 1JN	Part 2	This site is part of a wider draft allocation in the emerging Local Plan for residential development and therefore suitable for gypsy and traveller use. It is anticipated that the disposal of the site for residential development in accordance with the emerging Local Plan will be pursued and as such it will not be available for the development of Traveller accommodation. As the availability of the site for Gypsy and Traveller pitches was not confirmed the site was rejected in Part 2 of the Study.
NDT31	Westcombe Depot, Bideford	Part 2	<p>The site is currently in use as a waste and refuse depot for the Council. It is however the Council's intention to relocate from the site to a new facility in the next couple of years, meaning that it may become available for disposal or alternative uses.</p> <p>There are however a number of significant constraints: Including the fact that developing the site for Gypsy and Traveller use would incur significant costs due to demolition requirements and potential issues with contamination. The site is also constrained in terms of its narrow access off Westcombe Lane and residential amenity is a concern given the habitable windows of the adjacent residential properties. Given these issues the site has therefore been rejected in Part 2 as unsuitable for Gypsy and Traveller pitches.</p>
NDT32	Land at Rolle Road, Torrington	Part 1	This publicly owned site includes a parcel of greenfield land on the outskirts of Torrington that could be potentially available for Gypsy and Traveller use. It is however potentially constrained by bad neighbour uses with a haulage yard to the south and a sewerage works to the north. The site is also located in an area of flood risk (Zone 3a and b) and was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use.
NDT33	Cleavewood 1, Bideford, EX39 4AJ	Part 2	NDT33 and NDT34 includes two parcels of agricultural land, sitting either side of Manteo Way. The site is subject to a valid planning application for its comprehensive development for up to 300 dwellings with associated infrastructure and public open space (1/0626/2017/OUTM), which accords with the draft allocation in the emerging Plan. In principle the site is suitable for gypsy and traveller use given its residential allocation. The land receipt from the development is also required to facilitate the

			delivery of employment development elsewhere in the town on the draft allocation at Caddsdwn Business Park (recognising that the land at Manteo Way is allocated for employment development in the existing Local Plan). On this basis, it is very unlikely that the site would be available for development of Traveller accommodation. The site was therefore rejected in Part 2 of the Study.
NDT34	Cleavewood 2, Bideford, EX39 4AJ	Part 2	See NDT 33.
NDT35	Churchill Road, Bideford, EX39 4HG	Part 2	This is a publicly owned site, which was considered potentially available and therefore identified for further consideration. Given the woodland and unfavourable topography (on a fairly steep hillside) the site has therefore been rejected in Part 2 as unsuitable for gypsy and traveller pitches.
NDT36	Rugby Club Car Park, Riverbank, Bideford (Part of TDC0205)	Part 1	<p>This site is currently used for coach parking and as an overflow car park. There have been officer level discussions about the use of this site as a toleration site to manage encampment activity, following on from complaints arising from the existing site used for this purpose.</p> <p>The site was put forward as it may have had potential to be made available for traveller accommodation (transit site), however the site is located in an area of flood risk (Zone 3a and b) and was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use to flooding.</p>
NDT37	Skate Park and Car Park, Riverbank, Bideford	Part 1	<p>This site was previously home to a permanent skate park; however, the facility was recently removed due to reaching the end of its life and health and safety concerns. It currently houses a temporary skate facility however the ambition and intention are to provide a relocated new facility in the nearby park</p> <p>The site has been identified as a potential temporary transit site originally agreed at a meeting of the Community and Resources Committee of Torrridge District Council. The site has been subject to a community protest in relation to this matter and therefore this decision is subject to reconsideration. In terms of this Assessment the site is located in an area of flood risk (Zone 3a and b) and was therefore rejected in</p>

			Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use to flooding.
NDT38	Land at Ethelwynne Brown Close, East-the-Water, Bideford	Part 1	The site is located in an area of flood risk (Zone 3a and b) and was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, given the vulnerable nature of Gypsy and Traveller use to flooding.
NDT39	Former Cattle Market and Car Park, Chanters Road, Bideford	Part 1	<p>This publicly owned site includes a public car park and a series of redundant buildings that comprise the former livestock market facility. It is currently treated as an informal toleration site for travellers and is usually subject to some encampment activity during the year. The site is earmarked within the emerging North Devon and Torridge Local Plan for regeneration and the Council is looking into its development for recreation uses (including playing pitches) alongside car parking.</p> <p>Given the site is located in an area of flood risk (Zone 3a and b) it was therefore rejected in Part 1 as unsuitable for Gypsy and Traveller pitches, considering the vulnerable nature of Gypsy and Traveller use to flooding.</p>
NDT40	Car Park, Windmill Lane, Northam	Part 2	The site was identified as a candidate that could be potentially considered for release in the future. The majority of parking is however set over to payable permit-parking on the basis of providing off-road parking for nearby properties how do not have such facilitates. The loss of this parking would potentially have an adverse impact on highway safety in this location. This site is also overlooked by habitable windows of the adjacent residential properties. This site was therefore rejected in Part 2 on grounds of availability, potentially highways impact and residential amenity.
NDT41	Bonehill Car Park, Northam	Part 2	The site was identified for potential release by the Council through the public land review. However, further internal Council discussions have identified that the site is in reality not available, given it is now leased to Northam Town Council for use as car park. At the time of the survey the site was in use as a Car Park. This site is also overlooked by habitable windows of the adjacent residential properties. There are also potential sensitivities in relation to the adjoining cemetery. This site was therefore rejected in Part 2 on grounds of availability and residential amenity.
NDT42	Silcombe Wood, adjoining the	Part 2	Based on the adverse comments received from the County Council's Highways

	Bish Mill junction on the A361 east of South Molton		Officers regarding the site's constrained access and potential impact on highway safety the site is not considered suitable for Gypsy and Traveller use. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT43	Southern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB	Part 2	This site is currently considered unsuitable based on its landscape impact. According to the Landscape Appraisal development in this location would constitute a clear and evident incursion into this deeply rural area and detracts from its natural character and the sense of remoteness. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT45	Seabreeze, Long Lane, Appledore	Part 2	Given the associated landscape constraints in terms of introducing permanent structure into this sensitive location, this site is not considered suitable for Gypsy and Traveller use. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT47	Land adjacent to Canal Farm, Chilsworthy	Part 2	The site is not considered suitable for Gypsy and Traveller use, given the associated landscape constraints as set out in the landscape appraisal and also the close proximity to the sewage works and its potential adverse impact on residential amenity. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.
NDT48	Tween Moors Cross, Lay-by West of Horse Hill Lane	Part 2	Initial observations suggest the site is unlikely to be of a suitable size to successfully include the appropriate infrastructure to ensure highway safety. The site was therefore rejected in the Part 2 Assessment as unsuitable as a transit site or for gypsy and traveller pitches.

APPENDIX D: SITES WITH POTENTIAL

Appendix D – Sites with Potential

Site Ref	Site Name/Address		
NDT01	The Heights, Staddon Rd Holsworthy, EX22 6NJ		
Source of Site		Local Authority	Size
Existing Gypsy and Traveller Site		Torrige District Council	1.03 ha
Description of the Site			
<p>This site was included in the assessment as an existing gypsy and traveller site. In 2010 the applicants (who occupy a dwelling sited on the eastern side of the site) gained planning permission to develop two lodges to form gypsy accommodation for occupation by their sons. According to the information supporting the application the applicants agreed to provide the lodges for gypsy accommodation in general perpetuity.</p> <p>Upon site visit it was noted that one of the timber chalet lodges had been constructed and looked to be occupied but the other was only partially constructed. The application therefore remains extant. The lodges are located on what was an area of rough grassland/scrub in the open countryside. The site is bordered by hedges and trees on all sides. Surrounding uses include agricultural fields on all sides. The site sits approximately 1.5 miles from the village of Holsworthy.</p>			
Planning History			
<p>1/0658/2010/FUL - Erection of two lodges to form gypsy accommodation - amended siting of the lodges and access arrangements. Permission Granted 14/09/2010 (This application was largely identical to the previous permission albeit amendments to the siting and access).</p> <p>1/0092/2010/FUL - Erection of two lodges to form gypsy and travellers accommodation. Each lodge would have 3 bedrooms. Permission Granted 21/05/2010</p>			
AVAILABILITY			
<p>The site is an existing site, so available for gypsy and traveller use. The site has a partially implemented permission for 2 pitches. The owner of the site has confirmed that the additional unimplemented pitch will be completed and can confirm this take place within the next 5 years. The owner has also confirmed that if considered suitable, further land could be made available at this site with the introduction of another pitch/s.</p>			
SUITABILITY: Policy Constraints			
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>DVT2C (Development in The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design);</p>			

Appendix D – Sites with Potential

DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Traffic passing the site is of low speed and volume, the access appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode.

DCC Flood Risk: No flood risk issues within the site boundary that Flood Risk Management are aware of.

Landscape (Enderby Associates Ltd): The site comprises a triangular area of rough grassland the northern side of which, adjoining Staddon Road, is partially developed. This developed part is located at the high point of a broad ridge with the land falling southwards. Whilst there is a belt of stunted trees along the southern boundary, the existing development is apparent on the ridge from the rural lane to the south and partly intrudes onto the skyline. The mobile home located between the two chalets is also apparent and incongruous in what is a deeply rural part of the High Torridge Culm Plateau. The existing development may also be apparent in wider views due to its elevated and exposed position. Remoteness, wildness and tranquillity are identified characteristics of the LCA and the protection of ridgelines from development is part of the overall strategy for the area.

The surrounding settlement pattern is generally of scattered farmsteads, and individual and small ribbons of dwellings adjoining the lanes. Further development at this site would not be consistent with this pattern and is not considered to be appropriate. Further development is likely to increase the visually intrusive effects that are currently evident. It is recommended that existing development is defined and contained from the rest of the field.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or future occupants.

Environmental Designations: No TPOs within the site. No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Conservation and Heritage: No issues identified.

Development Management: The site already accommodates several gypsy and travellers. It is in open countryside away from neighbouring dwellings, but accessible to Holsworthy. DM raise no objection to this.

Appendix D – Sites with Potential

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraints.

DCC Education: No education constraints.

Property/ Estates: No response sought.

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Housing Equality: No comments received.

ACHIEVEABILITY

The owner of the site has confirmed that the additional unimplemented pitch will be completed and can confirm this take place within the next 5 years.

CONCLUSION

The Local Authority has recorded this site as providing 1 gypsy and traveller pitch in the GTAA. A review of the previous permission (including associated submitted material) suggests this site actually includes 2 pitches. This view was confirmed upon visiting the site, when reviewing the site size, access arrangements and current usage. It is recommended that a further pitch be recorded on the site to reflect the permitted permission. Availability/delivery of the second pitch has been confirmed by the owner/applicant, so the site can be recorded in the first 5-year time period. The site is largely unconstrained, but given the landscape impact of the site, it is not considered suitable for further pitches beyond those already permitted.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
1	0	0	0	1

Type of Use	Delivery Model
Gypsy and Traveller	Private Delivery

Appendix D – Sites with Potential

Site Photos



Appendix D – Sites with Potential

Site Map

Site: NDT01 - The Heights, Staddon Rd, Holsworthy, EX22 6NJ



Appendix D – Sites with Potential

Site Ref	Site Name/Address	
NDT03	Wonford Park Farm, Holsworthy, EX22 7DT	
Source of Site	Local Authority	Size
Existing Gypsy and Traveller Site (Temporary 5 Year Permission)	Torridge District Council	1.78 ha
Description of the Site		
<p>This site was included in the assessment as an existing gypsy and traveller site (albeit with a temporary 5-year permission). The site is located in the open countryside and consists of an area of agricultural land with a metal clad barn and stable building. The site is accessed by a short access track from the road which runs between Holsworthy Beacon and Thornbury. Surrounding uses include agricultural fields on all sides.</p>		
Planning History		
<p>1/1167/2015/FUL - Removal/variation of condition 3 of 1/0325/2012/FUL to allow for further change of use of land for stationing of caravans for residential occupation by a Gypsy/Traveller and for storage of a touring caravan (Amended description) Permission Granted 09/02/16. (Temporary 5-year permission).</p> <p>Despite its open countryside location and the Planning Policy for Traveller Sites states that when there is no five-year supply of deliverable sites then this should be a significant material consideration when considering applications for the grant of a temporary planning permission. This weighted in favour of the application and five years was considered appropriate given the work required by the Councils to produce a Gypsy and Traveller Allocations DPD, the current under supply of sites and human rights of the applicants.</p> <p>1/0325/2012/FUL - Change of use of land for stationing of caravan for residential occupation for Gypsy-Traveller and storage of a touring caravan. Permission Granted 29/12/2012. (Temporary 3-year permission).</p> <p>1/0693/2004/COU - Mobile Home. Application Refused 21/05/2004</p> <p>1/0694/2004/FUL - Chicken Sheds, pond for ducks (breeding) & poly tunnel (plants) for sale. Application Refused 21/05/2004</p> <p>1/1309/2004/FUL - Free range chicken sheds, duck breeding pond and polytunnels. Application Refused 27/08/2004</p> <p>1/1173/2007/CPE - Mobile home used as a residential unit. Application Refused 27/11/2007</p>		
AVAILABILITY		
<p>The site is an existing gypsy and traveller site with temporary permission and is therefore considered available for permanent consent.</p>		

Appendix D – Sites with Potential

SUITABILITY: Policy Constraints

Saved Policies: Torridge District Local Plan (Adopted September 2004) (superseded subsequent to assessment)

HSC11 . Gypsy Site Provision, DVT2C (Development in The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Traffic passing the site is of low speed and volume, the access appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode although Holsworthy Beacon (with bus service) is not too far.

DCC Flood risk: No flood risk issues within the site boundary that Flood Risk Management are aware of.

Landscape (Enderby Associates Ltd): This existing temporary site, comprises of a mobile home and metal clad building around a yard (partly enclosed by close-boarded fencing). The site is located on the south western boundary of this rectilinear sub-divided field which is defined by hedges and trees, with a single track rural lane passing along the northern boundary. Access is provided by a stone track along the western side where there appears to be a fence separating the site from the field to the west (not part of the site), which essentially forms part of the same landscape compartment. An HV transmission line and associated pylon cross the land to the east of the existing site. The field is located on a broad ridge which runs east of Holsworthy Beacon. The surroundings have a complex undulating topography and strong rural character which is only sparsely settled with scattered farmsteads (some of with large building complexes) within the Western Culm Plateau LCA. Here the strategy includes the protection of the sparse pattern, undeveloped character and sense of remoteness.

The site is visually discreet and therefore there is scope to integrate this pitch such that its effect on the character and perception of the area would be very limited. The site is not however considered suitable for further pitches. If the site was considered for permanent use, the boundary should be confined to the existing yard to prevent the expansion of ancillary activities into the adjoining land. The reinstatement of the old field boundary east of the yard (between the northern and southern boundaries) with native hedgerow planting should also be conditioned as this would provide containment in the limited view towards the site currently available from the road to the east. Native hedge planting along the western boundary, to define the boundary with the adjoining field and native hedge planting to assimilate the boarded fencing is also recommended. Other incremental improvements (such as widening and

Appendix D – Sites with Potential

surfacing the track and installation of lighting), should be avoided as this will urbanise the site and detract from the prevailing rural character of the area.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs within the site. No significant environmental constraints. No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: The Council recently granted a further extension of time for the siting of mobile homes for gypsy status (see 1/1167/2015). On the basis of the occupants being resident since 2012, DM raise no objection to them being permanent for G&T status only.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint

Property/ Estates: No response sought

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Housing Equality: No comments received.

ACHIEVEABILITY

Achievability would depend on regularising this as a permanent pitch.

CONCLUSION

This site is currently occupied, albeit with permission on a temporary 5-year basis. Following assessment of the site and acknowledging the comments received particularly from Development Management it is considered that the site is suitable, available and deliverable for one permanent pitch. Given the timescale of the existing temporary permission it is considered that the pitch can be delivered in the first 5 years for permanent Gypsy and Traveller use.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
1	0	0	0	1
Type of Use		Delivery Model		
Gypsy and Traveller		Private Delivery		

Appendix D – Sites with Potential

Site Photos



Appendix D – Sites with Potential

Site Map

Site: NDT03 - Wonford Park Farm, Holsworthy, EX22 7DT



Appendix D – Sites with Potential

Site Ref	Site Name/Address		
NDT05	Woodpark Copse, West Yeo, Witheridge, EX16 8PY		
Source of Site		Local Authority	Size
Existing Gypsy and Traveller Site		North Devon District Council	1.34 ha
Description of the Site			
<p>This site is an existing gypsy and traveller site. The site includes a paddock and woodland located in the open countryside, north of the village of Witheridge and adjacent to the B3137. It contains an agricultural timber barn and includes a lawful use for agriculture and forestry. The site's frontage to the road extends for approximately 300 metres and is largely comprised of low banking and substantial vegetation. The site currently includes 1 existing pitch, which is currently occupied.</p>			
Planning History			
<p>55361 - Erection of agricultural building for the storage of agricultural machinery and hay. Permission Granted 12/07/2013</p> <p>54152 - Approval of details in respect of discharge of conditions 6 (access closure, surfacing & drainage) & 11 (landscaping) attached to planning permission 50501. Permission Granted 26/06/2012</p> <p>50429 - Unauthorised material change of use land from agriculture to mixed residential and agricultural use by residential occupation and use of agricultural building (Enf 2464) Appeal Dismissed 05/11/2010</p> <p>16665 - Proposed erection of sheep shelter. Application Refused 09/03/1993</p> <p>16585 - Agricultural building notification in respect of erection of sheep shed. Permission Granted 26/01/93</p> <p>50501 - Change of use of land to allow stationing of caravan for residential occupation with associated works. Appeal Allowed 20/03/2012</p>			
AVAILABILITY			
<p>The site is an existing gypsy and traveller site and therefore potentially available for use. The owner has confirmed through this Assessment that the site could be made available for the delivery of an extra pitch in the short term.</p>			
SUITABILITY: Policy Constraints			
<p>Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)</p> <p>DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)</p>			

Appendix D – Sites with Potential

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)
ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: The site would have to be accessed from the B3137 road, which is National Speed Limit where the width and alignment would allow speeds up to this. Assuming the existing access is used, Highways would have reservations as to whether the required 215 metres could be met. Indeed, they are not sure there is a suitable point along the frontage where these sight lines could be achieved. From a sustainability point of view, pedestrian journeys to local services, schools etc. are not an option. Given these issues it is likely that this site would raise objections from the Highway Authority.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a low risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible. Please refer to Devon County Council's SuDS Guidance for more information.

Landscape (Enderby Associates Ltd): The site is triangular in shape, defined on the western side by the B3137 and associated robust hedgerow for much of its length. There is dense deciduous woodland (Woodpark Copse) to the east and open farmland rising to a ridge a little to the north. The site appears to be sub-divided by fencing into three compartments, with the central and southern parts forming grassland paddocks falling away to the south as part of a small tributary valley of the Little Dart river valley. The northern part of the site appears to contain a single storey timber building (possibly in residential use) with the adjacent area enclosed by low fences and a lean-to type building in the north west corner which is largely screened from the road by an area of mature trees. A public footpath runs across fields to the west of the road, opposite the site. Access is via a stone track curving into the site flanked by recent hedge planting.

The site is located within the Witheridge and Rackenford Moor LCA where the moors are noted as having a remote and wild character with a lack of settlement and absence of lighting away from main roads. The site is located within a farmed landscape and is some distance from the moors where rural settlement is limited to scattered farmsteads, often set back from the roads.

The existing development has a very limited and localised effect on landscape character and is generally well contained by vegetation. There could also be scope to accommodate a pitch in the north western part of the site without giving rise to further landscape or visual harm as long as existing vegetation is protected and managed appropriately. The central and southern paddocks, being on land falling away, glimpsed in winter through roadside vegetation, are not a suitable location for development.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or

Appendix D – Sites with Potential

future occupants.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs within the site. No significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

DDC Other (G&T Liaison): There is already a temporary acceptance site here and it is known to be a popular location with a group of established new travellers. Increasing this site would be supported.

Development Management: No comments received.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No comments.

Environmental Health: No issues identified.

Housing Equality: I wouldn't have any reservations about this site. I would see it more for permanent pitches as opposed to a toleration site / temporary stopping site due to its 'far away' location.

ACHIEVABILITY

Achievability of this site would largely be subject to appropriately addressing the highways constraints as noted and the subjective issue around whether the minor intensification of an existing permitted access would represent a severe highway safety issue. The site has been confirmed as available by the owner/occupant for 1 extra pitch on site. On this basis the site is considered achievable in the 1-5 year time frame.

CONCLUSION

The site currently includes 1 existing gypsy and traveller pitch which was granted on appeal in 2012. The site is potentially suitable for 1 further pitch subject to careful consideration of the highway concern. The site is potentially available given its existing permitted use and availability has been confirmed with the owner/occupier. The site could therefore be considered deliverable with the first 5 years of the gypsy and traveller site allocations DPD. Considering the size of the site, with appropriate landscape mitigation DLP feel there could be potential to increase the number of pitches on site to 2.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
1	0	0	0	1
Type of Use		Delivery Model		
Gypsy and Traveller		Private Delivery		

Appendix D – Sites with Potential

Site Photos



Appendix D – Sites with Potential

Site Map

Site: NDT05 - Woodpark Copse, West yeo, Witheridge, EX16 8PY



Appendix D – Sites with Potential

Site Ref	Site Name/Address	
NDT10	Land at OS 3059 Holsworthy Beacon	
Source of Site	Local Authority	Size
Existing Gypsy and Traveller Site (personal permission)	Torrige District Council	0.12 ha
Description of the Site		
<p>This site was included in the assessment as an existing gypsy and traveller site. The narrow site lies in the open countryside adjacent to the public highway (along the southern side of a narrow rural lane). The site is well screened with mature hedging and trees along the northern boundary. There are various structures visible on the site relating to the gypsy status of the occupier. Surrounding uses are agricultural on all sides.</p>		
Planning History		
<p>1/1549/2005/FUL - Variation of condition 1 of application 1/0447/2003 to retain residential accommodation without complying with Condition No. 1 and provision of mains water supply. Personal permission. Permission Granted 19/10/2005 whilst current occupant is residing on the site.</p> <p>1/0447/2003 - Retention of one unit of residential accommodation (two caravans joined together) Permission Granted March 2005. Approval on this site was given a temporary personal consent due to their not being a permanent potable water supply available on the site. A grant has since been secured to provide a mains water supply to the site via a connection in the adjacent field.</p> <p>1/1159/1996 - Retrospective application for the stationing of a caravan. Granted on Appeal 02/09/1996</p>		
AVAILABILITY		
<p>The site is an existing gypsy and traveller pitch and therefore considered available for use. The scope for an additional pitches would require confirmation from the occupants/owners; if the site is considered deliverable in the short term.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>HSC11 (Gypsy Site Provision); DVT2C (Development In The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).</p> <p>North Devon and Torrige Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		

Appendix D – Sites with Potential

SUITABILITY: Physical Constraints

DCC Highways: Traffic passing the site is of low speed and volume, the access appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode although Holsworthy Beacon (with bus service) is not too far.

DCC Flood risk: No flood risk issues within the site boundary that Flood Risk Management are aware of.

Landscape (Enderby Associates Ltd): This narrow site extends along the southern side of a narrow rural lane which follows a broad ridge east of Holsworthy Beacon. It is extremely discreet being contained by a dense hedgerow flanking the lane and by a hedge along the southern boundary, with existing development (which appears to comprise some low-level buildings/structures) apparently well contained. The access is also offset such that there are no views into the site. The surroundings have a complex undulating topography and strong rural character within the Western Culm Plateau LCA, which is only sparsely settled with scattered farmsteads (some of with large building complexes) and the cluster of properties at Holsworthy Beacon approx. 0.5km to the west. The strategy for the area includes the protection of the sparse pattern, undeveloped character and sense of remoteness.

The site is very discreet and has a minimal perceptible effect of landscape character although this is a reflection of the unimproved and somewhat undeveloped nature of the site. The retention of boundary vegetation is critical to the acceptability of this site.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant Issues in terms of residential amenity for neighbours or future occupants.

Conservation and Heritage: No anticipated historic environment impact.

Environmental Designations: Within reasonably close proximity to Brendon Farm SSSI. Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs within the site. No other significant environmental constraints. No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Development Management: This site is well screened and reasonably accessible to the main Holsworthy road. Development Management feel there is potential scope for a further pitch, using the existing access (so there is no breach of the hedgerow) and have no objections to this.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint

DCC Education: No education constraint

Property/ Estates: No response sought.

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Housing Equality: No comments received.

Appendix D – Sites with Potential

ACHIEVEABILITY

The achievability of this site will be largely determined by whether a further pitch is deliverable without a significant impact on the surrounding vegetation and screening. The site is considered potentially available but confirmation from the occupants/owners will be required if the site is to be deliverable in the first 5 years of the gypsy and traveller site allocations DPD.

CONCLUSION

The site is currently in use and a suitable location for Gypsy and Traveller use. If the site can be worked to accommodate another pitch satisfactorily with appropriate amenity space and screening there could be scope to include an additional pitch. The site has not been confirmed as immediately available, so is considered to have potential in the 5-10 year time frame.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	1	0	0	1

Type of Use	Delivery Model
Gypsy and Traveller	Private Delivery

Site Photos



Appendix D – Sites with Potential

Site Map

Site: NDT10 - Land at OS 3059 Holsworthy Beacon



Appendix D – Sites with Potential

Site Ref	Site Name/Address		
NDT13	Seven Brethren, Barnstaple		
Source of Site	Local Authority	Size	
Council land (including an existing Toleration Site)	North Devon	7.2 ha	
Description of the Site			
<p>Seven Brethren is a predominantly employment and leisure area in Barnstaple and is currently subject to comprehensive redevelopment and master planning. The leisure centre, public car park and events area (Zone A) will become available once replaced further south (indicatively in 2020) as part of comprehensive redevelopment. An existing toleration site (Zone B) adjoins car parking and an existing haulage site (Zone C), both of which could be relocated. The southern area (Zone D) is currently undeveloped and provides unmanaged green infrastructure, part of which may be needed to deliver replacement car parking. The site as a whole is directly west of the River Taw and located within Flood Zone 3, however its suitability is being reassessed given proposed Flood Defence plans that would mitigate against potential flood risk constraints in this location.</p>			
Planning History			
<p>63351 - Outline application for the erection of a new swimming facility in an extension to the existing centre, to include 25m swimming pool & learner pool, sports hall & associated facilities; together with external works comprising the provision of a new full size 3G artificial grass playing pitch, extension of the existing car parking, relocation of HGV parking to accommodate the new car parking, hard & soft landscaping. Approved 20/12/17.</p>			
<p>55809 - Hybrid application for a mixed-use development (at Anchorwood Bank) comprising of housing and commercial uses, which included improved flood defences along the river frontage of Seven Brethren (zone A). Approved 23/1/14. Site is under construction.</p>			
<p>52606 - Application under regulation 3 of the T & C P General Regulations 1992 for extension of car park into the overflow car park & events area. Approved 5/1/12.</p>			
<p>27565 - Application under regulation 3 of the T & C P general regs 1992 in respect of change of use of land to form overflow car park. Approved 27/09/99.</p>			
<p>23114 - Outline application proposed erection of tennis centre, gym club, skate board park, roller hockey pitch, together with formation of new car park and extension to existing car park (amended description and plans). Approved 11/02/97.</p>			
AVAILABILITY			
<p>Council owned site that is available or could be made available as part of current comprehensive redevelopment and master planning for Seven Brethren as a whole. It includes proposed provision of a</p>			

Appendix D – Sites with Potential

new leisure centre further south adjoining the Tarka Tennis centre (adjoining river Taw). Existing long-term leases exist on parts of the site (Zone C). Existing toleration site (Zone B) is currently available as a toleration site.

SUITABILITY: Policy Constraints

Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)

DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), DVS6 (Flooding and Water Quality), HSG2 (Development Boundaries), TRA6 (General Highway Considerations), ENV8 (Biodiversity), STY1 (Sub-Regional Centre), BAR14 (Seven Brethren Regeneration)

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities, Policy DM30: Sites for Traveller Accommodation, BAR13: Seven Brethren.

SUITABILITY: Physical Constraints

DCC Highways: The site is near the centre of Barnstaple and accessed through an industrial/retail area. Nearby sites regularly accommodate travellers without any highway issues arising.

DCC Flood Risk: An ordinary watercourse is within the site. Any alterations or works within the watercourse must be discussed with Devon County Council Flood Risk Management and Land Drainage Consent requested and approved where necessary. A main river (River Taw) is in close proximity to the site boundary. Any alterations or works within the river must be discussed with the Environment Agency and Flood Defence Consent requested and approved where necessary. Flood Zones 2 and 3 are within the site boundary. The National Planning Policy Framework must be adhered and the sequential and exception tests used where necessary. Any planning application must be accompanied by a flood risk assessment. The Risk of Flooding from Surface Water map shows a medium risk of flooding from surface water in some areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible. Please refer to Devon County Council's SuDS Guidance for more information. There is a potential risk of groundwater flooding. A minimum of 12 months ground water monitoring is required to assess the groundwater characteristics found at each individual site in order for an informed decision to be made on the conditions. Some historic flooding has occurred within the site boundary. Any historic flooding information should be used in conjunction with development proposals and any flood risk assessment.

Landscape (Enderby Associates Ltd): Given this brownfield site is located within an existing Industrial area, within the designated settlement boundary, detailed consideration of landscape constraints is not required as the site is considered suitable for development subject to any site specific constraints.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or

Appendix D – Sites with Potential

future occupants.

Environmental Designations: Located in Flood Zone 3 but risks of flooding mitigated by proposed new flood defences around Seven Brethren. No TPOs within the site. No other significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: No comments received.

DCC Archaeology: No anticipated impact upon any heritage assets.

DCC Minerals: No minerals constraint.

DCC Education: No education constraint.

DCC Other: The southern part of the site lies within a Waste Consultation Zone associated with Policy W10 of the Devon Waste Plan that seeks to protect waste management facilities (in this case a household waste recycling centre) from constraint by development that may be sensitive to impacts such as noise, dust and odours. Residential accommodation should not be located within the WCZ unless it can be demonstrated that an acceptable level of amenity can be achieved without constraining authorised waste management activity.

Gypsy/Traveller Liaison Service: Although this site is already used as a toleration site informally for NDDC, due regard needs to be applied to the sensitive impacts that are listed above; if you wouldn't put housing on that land then it shouldn't be used for GT use; however, if those can be agreed and this site proves not to be a sensitive site then it would make an ideal transit site as it is used as such now. Because of its location, I would prefer to see this site used as a transit site rather than for permanent due to its location and the amenities surrounding it.

Property/ Estates: NDC own all the land at Seven Brethren, but the occupation is leased for average of over 50 years. The current uses of the separate zones on Seven Brethren are as follows:

Zone A - Leisure Centre, long stay car park and events area

Zone B . Gypsy and Traveller Toleration Area, overflow car park, and Van Park

Zone C . Haulage . this is occupied on a long lease I would advise that this is area is not zoned as it is not being considered for redevelopment.

Zone D . Undeveloped amenity area with public footpath through

The current Gypsy and Traveller Toleration Area within Zone B is used frequently during the 12 months of the year. It may be possible that provision could be made for a new toleration area within the proposed masterplan/ redevelopment of Seven Brethren. There will need to a suitability assessment with regards to any new location however the new toleration area would still benefit from all the same amenities such as access to shops, services and welfare as the existing toleration area.

Environmental Health: No comments received.

Housing Equality: Subject to availability, I would be in full support of Severn Brethren as a transit/toleration site. It is a well-known location with our Travellers and the location is able to meet wider

Appendix D – Sites with Potential

needs with regards to its close proximity to local amenities.

ACHIEVABILITY

Achieving a new transit site or relocation of the existing toleration site would be subject to identifying how and where it would fit within the wider redevelopment of Seven Brethren. Delivery would not be possible until after proposed flood defence improvements have been completed, by when Zone A is considered potentially available and achievable. The availability of the haulage site (Zone C) is more uncertain than other parts of the site due to current leases. Zone D would result in an adverse biodiversity impact, which would need to be mitigated. The southern most area (south of Zone D) is considered too far from the current road network, with viability implications to providing vehicular access. Whilst unavailable Council land at Seven Brethren is already excluded from this assessment, some suitable areas identified in the assessment may become unachievable in the future by facilitating alternative more profitable uses. On this basis and in view of current redevelopment and regeneration ongoing in phases, provision of a new transit or toleration site is considered potentially achievable in Zones A and B and the northern most part of Zone D in the 5 to 10 year time frame, after flood defence improvements have been delivered.

CONCLUSION

It is considered that a site for either a new transit site or a relocated toleration site is potentially available and achievable in Zones A, B and northern part of Zone D subject to identifying how and where it could be accommodated within the wider redevelopment of Seven Brethren and whilst being compatible with surrounding uses. Delivery is potentially suitable, available and deliverable in the 5 to 10 year time frame after flood defence improvements have been delivered.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	1	0	0	1

Type of Use

Gypsy and Traveller

Delivery Model

Public sector Delivery

Site Photos



Existing leisure centre from North of Zone A



Site of new leisure centre, South of Zone A

Appendix D – Sites with Potential



Existing toleration site, Zone B



Existing haulage depot, Zone C



Northwards to northern part of Zone D

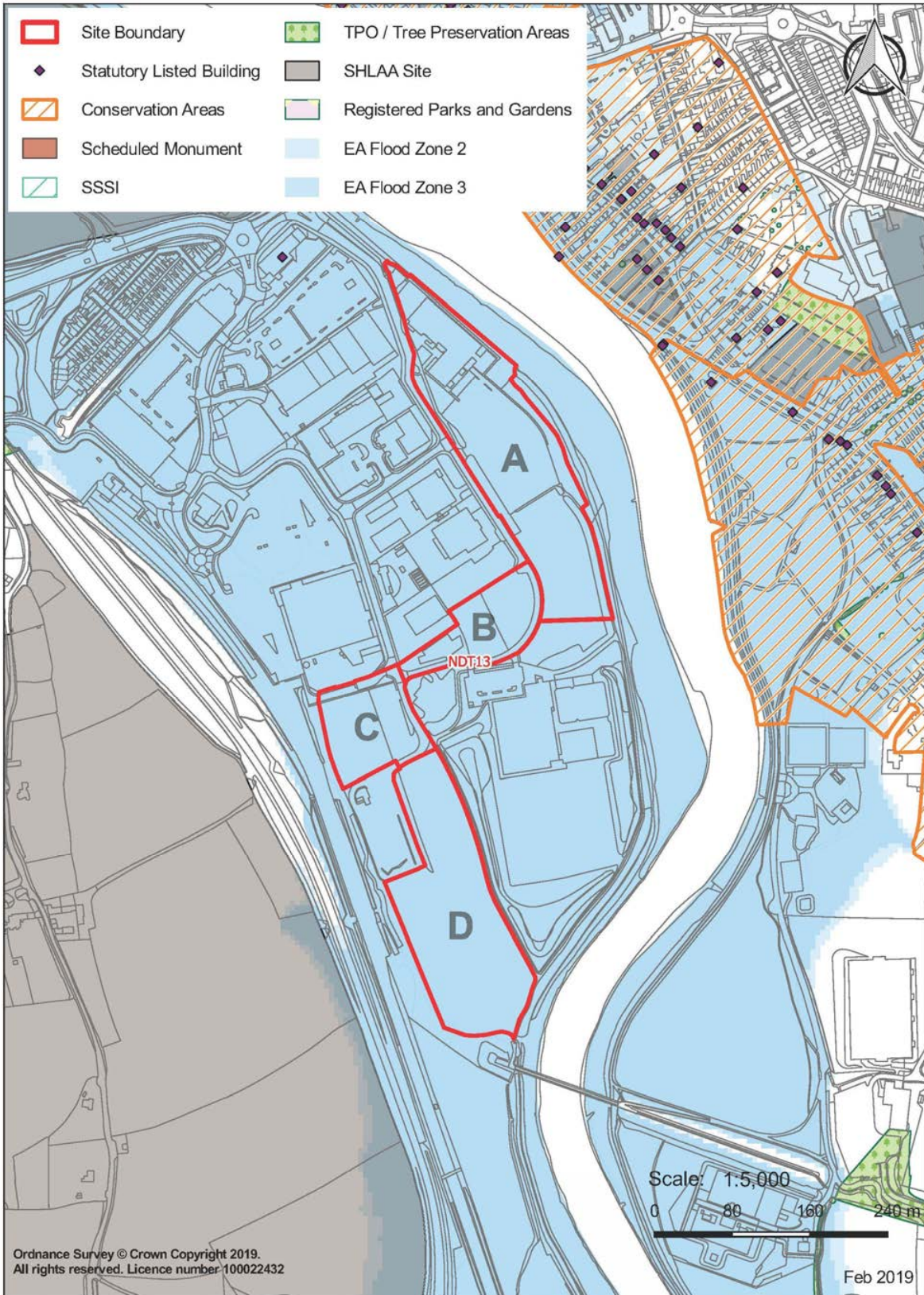


Southwards to southern part of Zone D

Appendix D – Sites with Potential

Site Map

Site: NDT13 - Seven Brethren (Toleration Site)



Appendix D – Sites with Potential

Site Ref	Site Name/Address	
NDT44	Land at Garland Cross, Kings Nympton, Umberleigh, Devon EX37 9TT	
Source of Site	Local Authority	Size
Existing Gypsy and Traveller Site (Temporary 5 Year Permission)	North Devon District Council	0.4 ha
Description of the Site		
<p>The site is located in open countryside around 3.2 km from the nearest village of Kings Nympton. The land (previously agricultural) is rectangular in shape and located adjacent the highway. The landscape character of the area is generally farmed lowland moorland and culm grassland. The site is bordered by mature hedge bank boundaries. The site features a galvanised steel shed and mobile accommodation.</p>		
Planning History		
<p>61523 - Retrospective application for the continued siting of a single occupant gypsy caravan (amended description) Permission Granted 17/10/2016 (Temporary 5-year permission). The Case Officer stated that the application site was within an <i>unsustainable location and due to the parking of vehicles and general paraphernalia that would be visible from the access, does have an impact on the appearance of the area</i>. However, the application was granted as a temporary permission to address the current shortfall in provision.</p> <p>50851 - Unauthorised development consisting of the construction of a block building without planning permission (ENF 6308) Received 06/08/2010.</p> <p>14856 - Proposed retrospective application for change of use of land to the siting of a mobile home. Granted 03/01/1992 . Permission was granted with a condition (2) that it was for the benefit for the applicant only, and on the discontinuance of their occupancy of the site, the uses thereby permitted would cease. As the previous occupant's interest in the site has ceased, this permission is no longer extant.</p>		
AVAILABILITY		
<p>The site is an existing gypsy and traveller site with temporary permission. The site has been confirmed as available to potentially regularise the existing pitch subject to temporary permission and potentially for an additional pitch.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)</p> <p>DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), DVS6 (Flooding and Water Quality), HSG2 (Development Boundaries), TRA6 (General Highway Considerations), ENV8 (Biodiversity), STY1 (Sub-Regional Centre), BAR14 (Seven Brethren Regeneration)</p>		

Appendix D – Sites with Potential

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: No comment provided.

DCC Flood Risk: No comment provided, however located in Flood Zone 1 and therefore limited risk of flooding.

Landscape (Enderby Associates Ltd): The site comprises a narrow strip of land located along the north side of a narrow rural lane, bounded largely by hedges and some developing trees. The site falls within the Witheridge and Rackenford Moor LCA where the moors are noted as having a remote and wild character, with a lack of settlement and absence of lighting away from main roads. Settlement is limited to scattered farms located alongside the lanes or set back from them. The site is positioned on a ridge where the land falls away to the north and south; consequently, the site is in a prominent, elevated and deeply rural location. The site was difficult to view but appears to contain a mobile home, block built single storey building, container and two other structures in the western part, with the eastern part as rough grassland. A short distance to the west lies a plot of land occupied by a mobile home and some sheds. Existing development (like the existing development to the west) is incongruous and has a local adverse effect on the character and appearance of the countryside.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant Issues in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No other significant environmental constraints.

Development Management: No comment provided.

Conservation and Heritage: The site does not look to impact upon any heritage features.

DCC Archaeology: No comment provided.

DCC Minerals: No comment provided.

DCC Education: No comment provided.

Property/ Estates: No comments.

Environmental Health: No issues identified.

Housing Equality: Would not have any reservations about this site. However, would consider it more for permanent pitches as opposed to a toleration site / temporary stopping site due to its 'far away' location.

ACHIEVEABILITY

The site is considered available due to the temporary consent and is potentially suitable subject to careful consideration of the sites potential highway and landscape impacts, as part of any future planning

Appendix D – Sites with Potential

application.

CONCLUSION

This site is a currently occupied gypsy and traveller site with permission on a temporary 5-year basis. The site is potentially suitable subject to detailed consideration of its highway access and landscape impact, which will require careful consideration as part of any future planning application. It could potentially be delivered in the first 5 years.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
1	0	0	0	1

Type of Use	Delivery Model
Gypsy and Traveller use.	Private Delivery

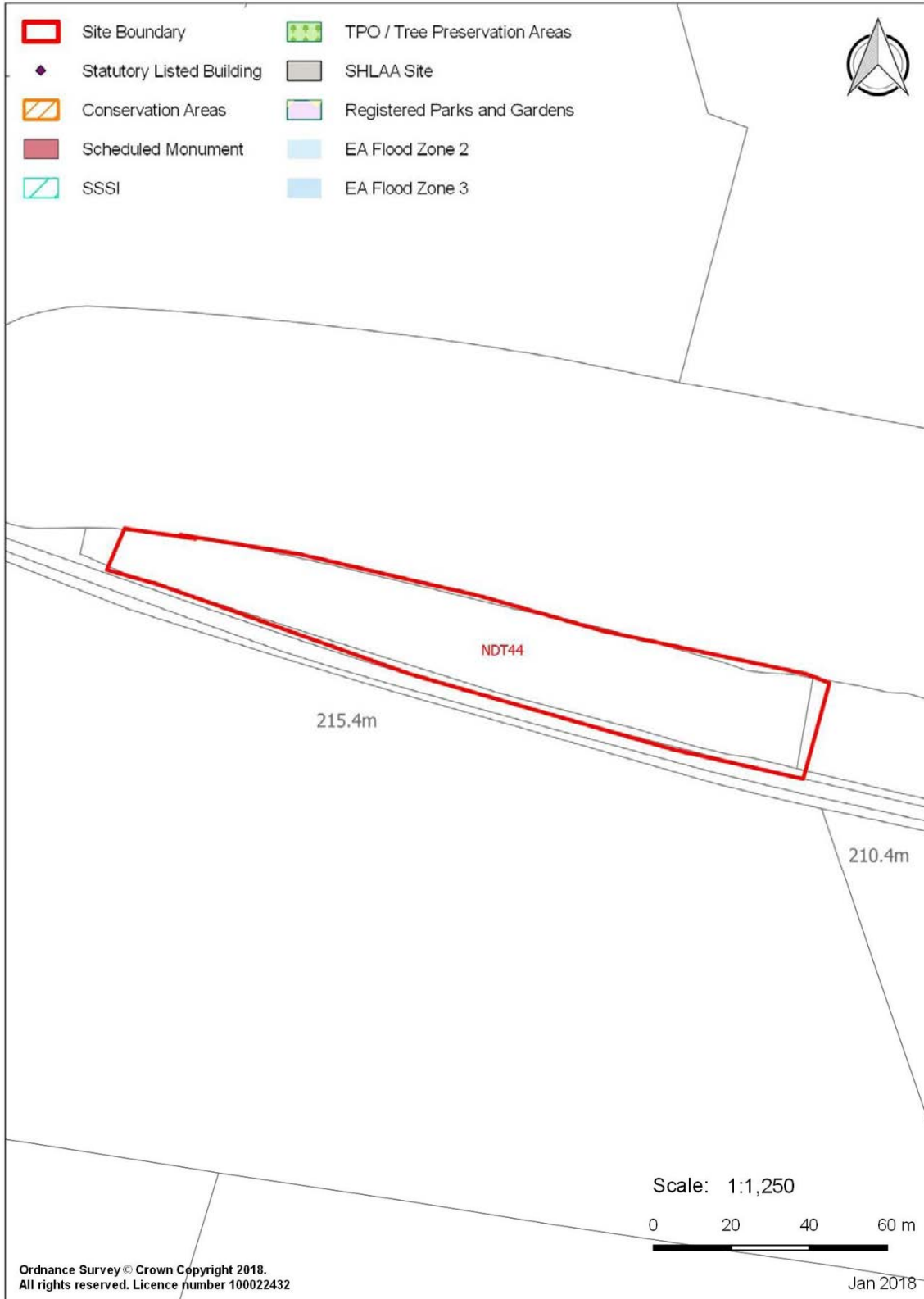
Photos



Appendix D – Sites with Potential

Site Map

Site: NDT44 - Land at Garland Cross, Kings Nympton



Appendix D – Sites with Potential

Site Ref	Site Name/Address	
NDT46	Land at Loxdown Woods, Loxdown Road	
Source of Site	Local Authority	Size
Call for Sites	Torridge District Council	2.08 ha
Description of the Site		
<p>The site comprises an area of woodland in the open countryside to the south of Weare Gifford. The site is bound by Loxdown Road to the North West and the A386 to the South West. The roughly rectangular northern parcel of the site is generally level, with a gentle fall to the east. However, a band of approximately 50m flanking the A386 is steeply sloping, falling significantly to the road on the boundary. A series of quarries adjoin the western boundary of this steeply sloping band, dropping away dramatically to the road below.</p>		
Planning History		
<p>1/0038/2017/AGR - 10m x 10m Forestry Building. Permission Granted 07/02/2017.</p> <p>1/1112/2016/AGR - Forestry shed 9m x 14.7m with green corrugated steel roof and wall material (not permitted development)</p> <p>1/1170/2015/AGR - Shed/workshop for forestry equipment. Permission Granted 02/12/2015.</p>		
AVAILABILITY		
<p>This site was put forward by the owner through the Call for Sites process and therefore can be considered available for Gypsy and Traveller use. This was subsequently withdrawn from the Assessment, however following this it was confirmed via telephone that this site could be made potentially available, by sale to a third party (at the appropriate price) for permanent traveller accommodation.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torridge District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>HSC11 . Gypsy Site Provision, DVT2C (Development In The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).</p> <p>North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: Highways have concerns about the visibility from Loxdown Road onto the A386, particularly to the left. Although efforts have been made to improve this splay, they would have issues</p>		

Appendix D – Sites with Potential

with increased use that this site would lead to. From a sustainability point of view, there are no acceptable walking links to local facilities and services. The Tarka Trail is close by, but this would not be acceptable in the hours of darkness. Moreover, the likely distances are beyond recommended walking distances to make this sustainable.

DCC Flood risk: No flood risk issues within the site boundary that Flood Risk Management are aware of.

Landscape (Enderby Associates Ltd): The site forms part of a large area of mixed woodland (part of an Ancient Woodland Inventory site - AWI) that defines the western flank of the Torridge valley. This, together with a strong sense of place, are intrinsic characteristics of the Torridge Valley LCA. The north western boundary extends to a narrow lane (Loxdown Road) and the adjoining part of the site comprises primarily mature plantation woodland with a number of former tracks evident. The south eastern part is deciduous woodland on steep slopes falling away to the valley below. Access into the site is via a gateway and rubble/stone track leading from the lane to a steel framed barn that is being erected in the central area (the foundations of which are adjacent to mature beech trees). A caravan and container are located nearby within a levelled and stone surfaced area. These elements are discernible through the trees from the lane.

Whilst the developed part of the site is reasonably discreet due to the tree cover, this is likely to change when the plantation (which requires thinning now) is harvested, although there is scope to plant native shrubs between the site and the lane to provide natural screening. It is considered that one or two pitches within the area around the barn could be accommodated with limited harm. The principal concerns lie with the extent of development (i.e. containing it from expanding into adjoining woodland) and the impact on the existing trees and woodland (an AWI site).

SUITABILITY: Other Potential Constraints

Residential Amenity: No residential amenity issues identified.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No other significant environmental constraints.

Conservation and Heritage: This site is bounded by listed buildings including The Downes at Monkleigh and three traditional cottages at Weare Gifford plus Beam Aqueduct. While these assets are within 200 metres to 400 metres the character of the landscape and the wooded nature of this valley means that limited development may be possible but this relies on maintaining the landscaping and whether the access can be achieved without harming the quality of the landscape in this valley side area.

Development Management: No comments provided.

DCC Archaeology: No anticipated archaeological impact, no mitigation required.

DCC Minerals: No minerals constraint

DCC Education: No education constraint

Property/ Estates: No comment provided.

Environmental Health: No issues identified.

Appendix D – Sites with Potential

Housing Equality: No comments provided.

ACHIEVEABILITY

Whilst this site is considered suitable for gypsy and traveller use, the achievability of this site will be largely focused on the ability to address and highways and landscape issues identified.

CONCLUSION

The site is considered suitable subject to the further consideration of landscape and highway issues through a detailed planning application. The site is available as it has been promoted for gypsy and traveller use. If an appropriately designed scheme is proposed the site is considered suitable for 2 pitches in the first 5 years.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
2	0	0	0	2

Type of Use

Gypsy and Traveller

Delivery Model

Private Delivery

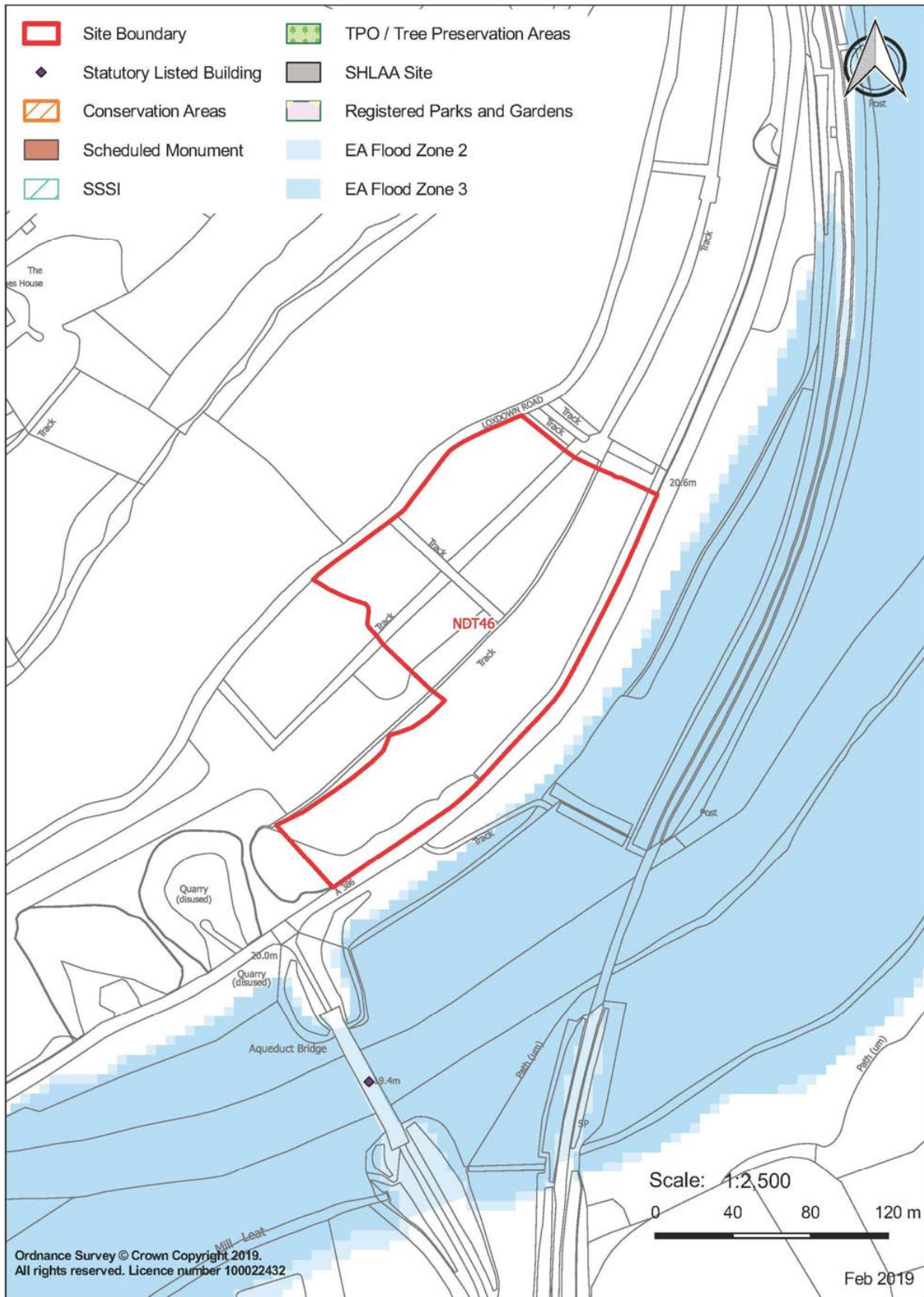
Photos



Appendix D – Sites with Potential

Site Map

Site: NDT46 - Land at Loxdown Woods, nr Weare Gifford (between Bideford & Great Torrington)



Appendix D – Sites with Potential

Site Ref	Site Name/Address	
NDT49	Land at Combesdown Cross, Staddon Road, Holsworthy	
Source of Site	Local Authority	Size
Call for Sites	Torrige District Council	0.31 ha
Description of the Site		
<p>The site comprises a greenfield parcel of land located in the countryside approximately 3km to the east of Holsworthy, at Combsdown Cross. It is surrounded by open arable agricultural land, with a highway - Staddon Road, running east-west along the southern boundary. Combsdown Cross, comprising of a highway junction flanked by a pair of detached residential properties, lies adjacent to the eastern boundary. The site itself has a triangular form, tapering to the east and comprising overgrown scrub land which is generally level with a gentle fall to the north. The site is bound on all sides by well-established hedge banks supplemented by sporadic tree planting, with an overgrown field gate entrance found to the centre of the southern boundary, fronting on to the highway. An unmade vehicular track way runs along the western boundary, providing access to a large agricultural field parcel that lies to the north of the site. A long distance off-road footpath/ cycleway (National Cycle Route 3) can be accessed approximately 400m distant from the site (near Anvil Corner), providing a safer sustainable transport route to Holsworthy, a centre which offers a range of services and facilities appropriate to meet day-to-day needs.</p>		
Planning History		
No relevant planning history.		
AVAILABILITY		
The site has been promoted by the owner as being potentially available for the provision of traveller accommodation. It is therefore deemed reasonable to conclude that the site could be available for development.		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>DVT2C (Development in The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).</p> <p>North Devon and Torrige Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
DCC Highways: Traffic passing the site is of low speed and volume, an acceptable access is likely to be		

Appendix D – Sites with Potential

able to be achieved. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode.

DCC Flood risk: A Critical Drainage Area (CDA) borders the site boundary. There is a need for surface water to be managed to a higher standard than normal, to ensure any new development will contribute to a reduction in flood risks in line with NPPF. Maps and details of CDAs can be accessed at

<https://www.devon.gov.uk/floodriskmanagement/planning-and-development/>.

Landscape (Enderby Associates Ltd): The site comprises a small triangular field at Combesdown Cross. There appears to be no active access into the field which appears to be unused and is showing evidence of scrubbing over. The boundaries are generally strong and defined in places by hedgebanks, scrub and a number of stunted oak trees which are a characteristic of the locality. The southern boundary adjoins Staddon Road and is defined by a belt of scrub with occasional trees and large bushes; to the west is a farm track providing access to adjoining fields. There are two dwellings located at the junction of a lane with Staddon Road opposite the eastern end of the site. The area has a strong rural character being located within a deeply rural part of the High Torridge Culm Plateau LCA where remoteness, wildness and tranquillity are particular identified characteristics of the LCA. The land falls away gently to the north towards a broad shallow valley and is located below slightly higher land south of Staddon Road. The vegetation that surrounds the site gives the appearance of an area of woodland when seen in wider views, notably from Staddon Road where it rises up to the A3072, with no perception in summer of the open part of the field contained within.

The settlement pattern is generally of scattered farmsteads and individual and small ribbons of dwellings adjoining the lanes. Given the immediate proximity of the two existing dwellings a small scale (limited to one or two units), low rise and appropriately designed development within the site would not be entirely out of keeping with the sparse development pattern as long as the important surrounding vegetation, which is an intrinsic landscape feature and which substantially contains the site, is retained, safeguarded and managed appropriately to maintain and enhance enclosure. The suitability of this site is also subject to the design of an appropriate access that ensures the site is appropriately screened from Staddon Road.

SUITABILITY: Other Potential Constraints

Residential Amenity: The site has strong boundary treatments which could be principally retained as part of any development. The site is largely flanked by open agricultural land with a pair of detached residential properties found nearby but separated by a highway to the south east. Development of the site is unlikely to have any significant adverse impacts on the residential amenity of nearby occupiers and there are no surrounding uses that are likely to have an unacceptable impact on the residential amenity of potential occupiers of the site.

Access: Unable to access the interior of site during visit as perimeter boundary treatments appear to be continuous. An overgrown field entrance to the highway on the southern boundary is likely to provide the

Appendix D – Sites with Potential

most appropriate location for the formation of a highway access.

Environmental Designations: The site is not subject to any environmental designations that are likely to impact on the development of the site for the provision of traveller accommodation. A County Wildlife Site (Hollacombe Cottages) lies approximately 480m to the south east of the site, however it is sufficiently distant that it not considered that development is likely to have an impact upon it. Located in Flood Zone 1 and therefore limited risk of flooding.

Conservation and Heritage:

No issue with the site at Combes Cross in terms of historic interest or impact on heritage assets. I am sure there is interest underground but this is not likely to be compromised by the proposed use. As such there are no identified heritage assets in the vicinity of the site and it is considered that development is unlikely to have any adverse impacts on any designated or identified undesignated heritage assets.

Tree / Landscape Officer: This is a small parcel of poor agricultural land which has limited farming use. The site is well screened due to mature hedgerows and hedgerow trees, so the landscape impact would be small. There would be a small loss in habitat due to removal of some hedgerow for a site access. The site is in open country side, but close to main road access into Holsworthy.

Development Management: No comment received.

DCC Archaeology: No anticipated impact upon any heritage assets.

DCC Minerals: No minerals constraint.

DCC Education: No education constraint.

Property/ Estates: Not applicable . no comment received.

Environmental Health: The site is located at the far eastern end of Staddon Road which is largely rural. Agricultural premises exist nearby but not in close proximity that would adversely impact on the site. I am not aware of any pollution or contamination issues at this site or immediate area. However, if the site is being considered as a future traveller site, a land contamination assessment would certainly be required.

Housing Equality: Not applicable . no comment received.

ACHIEVABILITY

There are no significant identified constraints that would preclude the delivery of a small number (up to two) of pitches for permanent accommodation on the site. Whilst the site is identified as being potentially available, it is in private ownership and achievability would be dependent upon private delivery.

CONCLUSION

The site itself is considered physically capable of accommodating one or two pitches of permanent accommodation being broadly level with a site frontage potentially capable of accommodating appropriate highway access and bound by hedgerows and tree planting that would provide appropriate screening of the site within the wider landscape. Some loss of trees and hedge bank is likely to be required to accommodate the formation of an appropriate highway access with associated visibility splays, however the site is sufficiently sized to be potentially able to accommodate compensatory

Appendix D – Sites with Potential

planting. Whilst the site lies on the periphery of a Critical Drainage Area, subject to detailed investigation of ground conditions, the site is considered to be potentially capable of accommodating surface water drainage infrastructure necessary to support the scale of potential development.

The site does however lie in a relatively isolated rural location, some three kilometres distant from Holsworthy, the closest centre offering a range of services and facilities sufficient to meet the day to day needs of potential occupants; tempering the sustainability of the site.

The site is identified as being available for the development of traveller accommodation and, subject to negotiated sales arrangements and a willing private developer, is not considered to be subject to any extraordinary development constraints that would prohibit development being achievable.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
2	0	0	0	2

Type of Use	Delivery Model
Gypsy and Traveller	Private Delivery

Site Photos



External view west along southern boundary (site to right)



External view east along southern boundary (site to left)



View east along northern boundary (site to right)



View south along western boundary (site to left)

Appendix D – Sites with Potential



View into site from south west corner



View of overgrown pre-existing field entrance

Appendix D – Sites with Potential

Site Map

Site: NDT49 - Land north of Staddon Road



Scale: 1:1,250

0 20 40 60 m

APPENDIX E: SITES REJECTED FOLLOWING FULL PART 2 ASSESSMENT

Note: Appendix does not include details of sites that were rejected following an initial site visit in Part 2 of the Assessment, with the summary reasons for rejection of such sites provided within Appendix C.

Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT02.1	Northern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB	
Source of Site		Local Authority
Existing Gypsy and Traveller Site (unauthorised)		Torridge District Council
Size		
1.71 ha		
Description of the Site		
<p>The site is located in the open countryside within the parish of Bradworthy. The site is one of 3 sites which front a minor county road along its western boundary (see NDT02.2 and NDT43). These sites have been sub-divided to take account of the realities of ownership and site activity. There is a dense area of public woodland to the north and the site borders NDT02.2 to the south. Within the site there is an unauthorised mobile home and airport trailer.</p>		
Planning History		
<p>See Planning History for NDT02.2 . Although this covers the site directly below. The existing caravan looks to be located within this section of the land (as opposed to within the boundary of the refused application).</p>		
AVAILABILITY		
<p>Assume availability given the existing use but would require confirmation in terms of the occupants/owner's aspiration for extra pitches if taken forward.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torridge District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p>		
<p>DVT2C (Development in The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage)</p>		
<p>North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)</p>		
<p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: Traffic passing the site is of low speed and volume, the access appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode.</p>		
<p>DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from</p>		

Appendix E – Other Sites Write Ups

surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible.

Landscape (Enderby Associates Ltd): The site comprises a significant area of grassland which appears to be subdivided. A hedge and single track rural lane defines the western boundary, with a dense area of plantation woodland to the north and east (Open Access Land). The southern boundary is open to adjoining site NDT02.2. A number of sheds and other paraphernalia are located along the western boundary of the site, with materials evident extending into the adjoining grassland. The site is located in the Western Culm Plateau LCA and prior to occupation the site was undeveloped rough grassland with some scrub that created a natural, wild character that provided a natural edge to the adjoining woodland. Settlement within the area is primarily widely scattered compact farmsteads and the LCA strategy is to protect this sparse pattern, undeveloped character and sense of remoteness.

The encroachment and change in character that has occurred constitutes a clear and evident incursion into this deeply rural area which detracts from its natural character and the sense of remoteness; the existing use also contributes to the cumulative landscape and visual effects of development that has occurred in sites NDT2.2 and NDT43 which are inconsistent with the distinctive sparse settlement pattern. From a landscape perspective the site is considered an unsuitable location for G&T development.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1. No TPOs within the site. No significant environmental constraints. No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: This site is acceptable in terms of the wider landscape impact and for not having an adverse impact on neighbouring amenity. The big issue is the remote location, the poor road network and distance from any amenities. The site is subject to a range of enforcement issues, however details on these are confidential. The site is very isolated and therefore should only be considered as a last resort.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No response sought.

Appendix E – Other Sites Write Ups

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Housing Equality: No comments received.

ACHIEVEABILITY

The achievability of this site is largely dependent on providing the appropriate mitigation in terms of limiting impacts on the surrounding landscape.

CONCLUSION

Whilst the site is currently occupied, recent permissions have been refused on site NDT02.2 (directly below) to authorise Gypsy and Traveller use. Apart from the identified landscape constraints, the site is however considered largely suitable for Gypsy and Traveller use. Given the Councils find themselves short of a five-year supply there could be scope to reconsider this site in terms of whether a proposal for Gypsy and Traveller pitches could successfully be delivered with limited impacts on the landscape.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use	Delivery Model
Gypsy and Traveller	Private

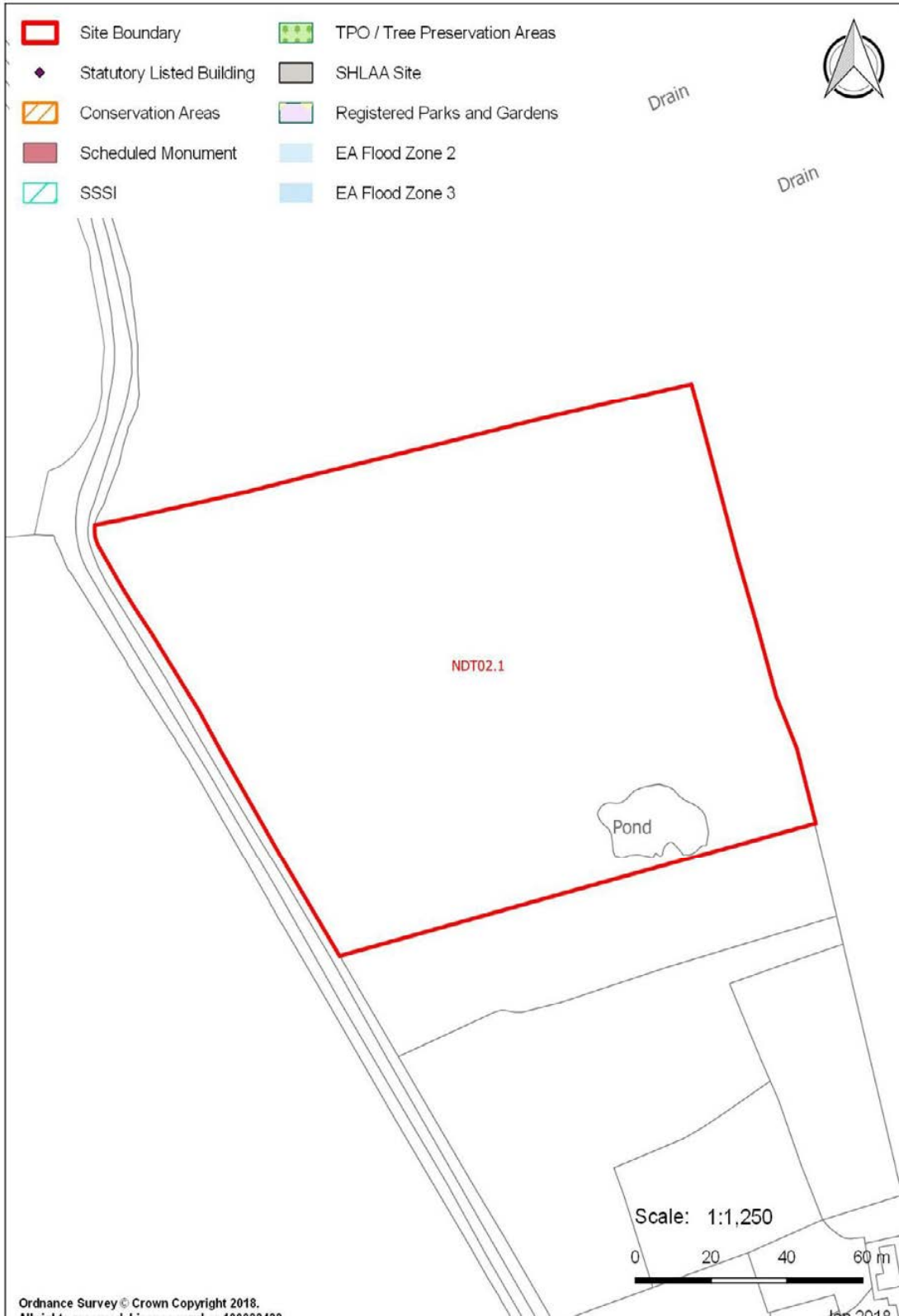
Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT02.1 - Northern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT02.2	Little Rainbows End, Bradworthy, Holsworthy, EX22 7SB	
Source of Site	Local Authority	Size
Existing Gypsy and Traveller Site (unauthorised)	Torrige District Council	0.32 ha
Description of the Site		
<p>The site is located in the open countryside within the parish of Bradworthy. The site is one of 3 sites which front a minor county road along its western boundary (see NDT02.1 and NDT43). These sites have been sub-divided to take account of the realities of ownership and site activity. The site is subject to a refused application for Gypsy and Traveller use although the location of the existing unauthorised caravan looks to be located within NDT02.1 north of the site (as opposed to within the boundary of the refused application).</p>		
Planning History		
<p>1/1016/2016/FUL - Retrospective application for access and siting of air bus trailer and caravan as one unit of accommodation. Re-submission of 1/1016/2016/FUL (refused 02/12/2016). The application was refused as it was not supported by any evidence of Gypsy / Traveller status by the applicant so there was no justification to support residential development in this location.</p> <p>The application was then re-submitted on the 31/05/2017 under reference 1/0531/2017/FUL and again refused (decision issued 25/07/2017) as the information supplied with the application failed to demonstrate an essential need for a worker to live on site and therefore no justification for a mobile home in this location. The application also did not provide information to consider the impact from development on surface and foul water flows or potential pollution to the water environment.</p>		
AVAILABILITY		
Assume availability given the existing use.		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>DVT2C (Development In The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage);</p>		

Appendix E – Other Sites Write Ups

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Traffic passing the site is of low speed and volume, the access appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible.

Landscape (Enderby Associates Ltd): The site comprises a linear field of rough grassland subdivided by a stone track running eastwards, from the rural lane on the western boundary, to a yard that appears to contain a green painted caravan and an airport trailer adjoining the edge of the plantation woodland that lies beyond the eastern boundary. The southern and northern boundaries appear ill-defined, with the site forming part of a larger landscape compartment of rough grassland, between sites NDT02.1 and NDT43.

The site is located in the Western Culm Plateau LCA, prior to occupation, the site was undeveloped rough grassland with some scrub that created a natural, wild character and provided a natural edge to the adjoining woodland. Poorly drained grasslands and sense of remoteness are distinctive characteristics of the LCA. Settlement within the area is primarily widely scattered compact farmsteads. The LCA strategy is to protect this sparse pattern, undeveloped character and sense of remoteness.

The encroachment and change in character that has occurred constitutes an evident incursion into this deeply rural area which detracts from its natural character and the sense of remoteness; the existing use also contributes to the cumulative landscape and visual effects of development that has occurred in sites NDT2.1 and NDT43 which are inconsistent with the distinctive sparse settlement pattern. From a landscape perspective the site is considered unsuitable location for G&T development.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1. No TPOs within the site. No significant environmental constraints. No identified issues in terms of contaminated land, drainage/flooding, air

Appendix E – Other Sites Write Ups

pollution, noise, licensing and asbestos risk.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: This site is acceptable in terms of the wider landscape impact and for not having an adverse impact on neighbouring amenity. The big issue is the remote location, the poor road network and distance from any amenities. The site is subject to a range of enforcement issues, however details on these are confidential. The site is very isolated and therefore should only be considered as a last resort.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No response sought.

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

ACHIEVEABILITY

The achievability of this site is largely dependent on providing the appropriate mitigation in terms of limiting impacts on the surrounding landscape.

CONCLUSION

Apart from the identified landscape constraints, the site is considered largely suitable for Gypsy and Traveller use. Given the Councils find themselves short of a five-year supply there could be scope to reconsider this site in terms of whether a proposal for Gypsy and Traveller pitches could successfully be delivered, with limited impacts on the landscape.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use	Delivery Model
Gypsy and Traveller	Private

Appendix E – Other Sites Write Ups

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT02.2 - Little Rainbows End, Bradworthy, Holsworthy, EX22 7SB



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT08	Site at Elworthy Cross, Witheridge	
Source of Site	Local Authority	Size
Tolerated Trespass Site	North Devon District Council	0.03 ha
Description of the Site		
<p>The rural site includes a small lay-by just north of Elworthy Cross, the nearest village being Witheridge. The lay-by sits by the side of a single track rural lane close to the T junction and is currently being used as a temporary stopping place for Gypsy and Travellers. The site was occupied at the time of the visit by a caravan, converted coach and transit van.</p>		
Planning History		
Unknown		
AVAILABILITY		
This would require further confirmation from the County Council Highways Authority if this was to be considered available.		
SUITABILITY: Policy Constraints		
<p>Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)</p> <p>DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)</p> <p>North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: No comments received.</p> <p>DCC Flood risk: No comments received.</p> <p>Landscape (Enderby Associates Ltd): This transit site comprises a layby by the side of a single track rural lane at a T junction, located on a broad elevated ridge within the Witheridge and Rackenford Moor LCA. Here the moors are noted as having a remote and wild character with a lack of settlement and absence of lighting away from main roads. At time of the landscape survey the site was occupied by a converted coach, horsebox and two vehicles. These appear incongruous in this deeply rural area and</p>		

Appendix E – Other Sites Write Ups

are very conspicuous from the junction, but partially screened from other aspects by nearby vegetation and lane-side hedges; as the land to the north falls away there is the potential for vehicles to be apparent above the flanking hedge. The effect on rural character appears to be localised. Although the site is remote and access is limited to narrow lanes the site could be considered acceptable for transit use but is unsuitable as a permanent site.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant Issues in terms of residential amenity for neighbours or future occupants.

Environmental Designations: No significant environmental constraints. Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs within the site. No significant environmental constraints.

Conservation and Heritage: No comments received. anticipated historic environment impact. Although no listed buildings or other heritage assets within or adjacent the site.

Development Management: No comments received.

DCC Archaeology: No comments received.

DCC Minerals: No comments received.

DCC Education: No comments received.

Property/ Estates: No comments received.

Environmental Health: No comments received.

Housing Equality: No comments received.

ACHIEVABILITY

In order to deliver a transit site in this location it would require some dividing road infrastructure to ensure highways safety, or the relocation of the site access. Confirmation would also be required from DCC to ensure this site was available for Transit use.

CONCLUSION

Given the size of the site, it is unlikely to be suitable to successfully and safely include the appropriate infrastructure to support Gypsy and Traveller use. The site is also considered too close to the T junction to ensure highway safety.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Appendix E – Other Sites Write Ups

Type of Use	Delivery Model
Transit	Public

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT08 - Site at Elworthy Cross, Witheridge



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT14.1	Disused lay-by south of the A39	
Source of Site		Local Authority
Call for Sites		North Devon District Council
Size		
0.6 ha		
Description of the Site		
<p>This site includes a disused lay-by on the southern side of the A39. The site holds several vacant buildings associated with the previous use, an area of grassland and tree covered area. The tree coverage surrounding the site is covered by a tree preservation order.</p>		
Planning History		
<p>32322 - Continued siting of caravan & ancillary buildings for the sale of refreshments (renewal of 26417) . Permission Granted 12/02/02.</p> <p>26417 - Continued siting of caravan & ancillary buildings for the sale of refreshments (renewal of 21327). Permission Granted 14/01/99</p> <p>21327 - Continued siting of caravan & ancillary buildings for the sale of refreshments (renewal of pp 18229). Permission Granted 12/12/95</p> <p>18229 . Retrospective application in respect of continued siting of caravan & ancillary buildings for the sale of refreshments. Permission Granted 01/02/94</p> <p>11205 - Proposed siting of tourist information caravan. Permission Granted 13/02/90</p> <p>9295 . Proposed siting of tourist information caravan (May to September each year). Permission Granted 03/01/90</p> <p>2948 . Circular 18/84 Application: Proposed formation of picnic area adjacent to route of new Trunk Road. NDDC Indicated Approval 28/1/88</p> <p>84/511/27/1 . Circular 7/77 Notification by Dept. of Environment & Transport . Outline proposals, Lydacott & Rooks Bridge Picnic Areas. NDDC Indicated Approval 24/4/84</p> <p>83/1741/27/1 . Circular 7/77 Notification by Dept. of Environment & Transport . Outline application: two picnic areas adjacent to new trunk road (A39). NDDC Indicated Refusal 29/11/83</p>		

Appendix E – Other Sites Write Ups

AVAILABILITY

The site was put forward through the Call for Sites but not by the owner, therefore, it would require confirmation from DCC in terms of availability for Transit use. Following later confirmation from the County Council the site is not considered to be available for Gypsy and Traveller Use.

SUITABILITY: Policy Constraints

Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)

DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: The site is not suitable due to access being left in and left out only. To travel to Barnstaple from the site vehicles would have to travel all the way to Bideford to turn around or carry out unsafe right turn manoeuvres. Any right turns at this location in or out of the site would be severely dangerous on this fast road which includes an overtaking lane in this location. There is no alternative access to the site.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible. Please refer to Devon County Council's SuDS Guidance for more information. There is a potential risk of groundwater flooding. A minimum of 12 months groundwater monitoring is required to assess the groundwater characteristics found at each individual site in order for an informed decision to be made on the conditions. A Critical Drainage Area (CDA) is within the site boundary. There is a need for surface water to be managed to a higher standard than normal, to ensure any new development will contribute to a reduction in flood risks in line with NPPF.

Landscape (Enderby Associates Ltd): This former roadside lay-by contains a redundant building and areas of surfacing raised slightly above the adjoining road. It is well contained from the surrounding area and only open to view from the immediate section of the A39. It is a suitable brownfield site and there is space to accommodate appropriate screening measures between the road and the internal part of the site. The root protection areas of TPO trees would need to be respected if the site is to be developed.

Appendix E – Other Sites Write Ups

SUITABILITY: Other Potential Constraints

Residential Amenity: There could be residential amenity and noise issues given the site is location adjacent the busy A39 with no current screening.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. Surrounded by heavy woodland which are protected through TPOs but no TPOs on the actual site. No other significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: No comment

DDC Other: The site is likely to be needed as a future drainage area or environmental mitigation for the NDLR improvement scheme.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No comments.

Environmental Health: No issues identified.

Housing Equality: I would have reservations re the A39 laybys unless an additional access road was built due to safety concerns

ACHIEVEABILITY

This site is unlikely to be considered suitable given the highways constraints.

CONCLUSION

Based on the comments received from the County Council's Highways Officers, this site is not considered suitable for Transit provision given the access constraints and potential impact on highway safety.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0
Type of Use		Delivery Model		
Transit use		Public		

Appendix E – Other Sites Write Ups

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT14.1 - Disused lay-by south of the A39



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT14.2	Disused lay-by north of the A39	
Source of Site	Local Authority	Size
Call for Sites	North Devon District Council	0.65 ha
Description of the Site		
<p>This site includes a former roadside lay-by north of the A39. The site contains several vacant buildings associated with the previous use, open grassland and access roads/ hardstanding. Surrounding uses include the A39, agricultural fields and woodland.</p>		
Planning History		
<p>39038 . Application under Regulation 3 of the T & C P Gen Regs 1992 Notification by DCC in respect of proposed transit site for travellers comprising 12 plots with amenity blocks, existing tarmac roads to remain with new concrete plots, existing toilet block to be demolished & mobile café to be removed, with formation of fenced platy area, 2.4m high perimeter mesh fencing & entrance gates, closure of access to A 39 & formation of new access to lane (Old Bideford Road), together with lighting columns . Withdrawn 14/12/04</p> <p>31648 . Application under Regulation 3 of the T & C P Gen Regs 1992 in respect of erection of mast for CCTV microwave transmission equipment . Conditional Consent 28/9/01</p> <p>18402 . Retrospective application in respect of siting of chalet for sale of refreshments . Conditional Consent 15/3/94</p> <p>2948 . Circular 18/84 Application: Proposed formation of picnic area adjacent to route of new Trunk Road. NDDC Indicated Approval 28/1/88</p> <p>84/511/27/1 . Circular 7/77 Notification by Dept. of Environment & Transport . Outline proposals, Lydacott & Rooks Bridge Picnic Areas. NDDC Indicated Approval 24/4/84</p> <p>83/1741/27/1 . Circular 7/77 Notification by Dept. of Environment & Transport . Outline application: two picnic areas adjacent to new trunk road (A39). NDDC Indicated Refusal 29/11/83</p>		
AVAILABILITY		
<p>The site was put forward through the Call for Sites but not by the owner, therefore, to be considered available it required confirmation from DCC. Following later confirmation from the County Council the site was not considered to be available for Gypsy and Traveller Use.</p>		

Appendix E – Other Sites Write Ups

SUITABILITY: Policy Constraints

Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)

DVS1 (Design); DVS2 (Landscaping); DVS3 (Amenity Considerations); ENV1 (Development in the Countryside); TRA6 (General Highway Considerations).

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Despite being the same situation on the opposite side of the road to NDT14.1, this site could be suitable if access was obtained via a new access onto the Old Bideford Road north of the site. The existing access points are not considered safe due to the impact of right turning traffic. This would only be acceptable if a minimum width of 15m across the site frontage with the A39 was set aside for future widening of the A39.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible. Any future consideration should refer to Devon County Council's SuDS Guidance. A Critical Drainage Area (CDA) is within the site boundary. There is a need for surface water to be managed to a higher standard than normal, to ensure any new development will contribute to a reduction in flood risks in line with NPPF. Maps and details of CDAs can be accessed at <https://new.devon.gov.uk/floodriskmanagement/planning-and-development/>.

Landscape (Enderby Associates Ltd): This former roadside lay-by contains a redundant building and areas of surfacing and is, in part, slightly below the adjoining road. It is well contained from the surrounding area and only open to view from the immediate section of the A39. The site is considered a suitable brownfield site for Gypsy & Traveller use and there is space to accommodate appropriate screening measures between the road and the internal part of the site. Vegetation that forms a screen on the northern boundary requires protection as the land beyond falls away towards the estuary and there will be views towards the site from this direction. The root protection areas of trees would need to be respected if the site is to be developed.

SUITABILITY: Other Potential Constraints

Residential Amenity: Residential amenity and noise issues given the site is location adjacent the busy A39 with no current screening.

Appendix E – Other Sites Write Ups

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs within the site area No significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: No comments provided.

DCC Other: The site is likely to be needed as a future drainage area or environmental mitigation for the NDLR improvement scheme.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint

DCC Education: No education constraint

Property/ Estates: No comments

Environmental Health: No issues identified.

Housing Equality: I would have reservations re the A39 laybys unless an additional access road was built due to safety concerns.

ACHIEVEABILITY

Devon County Council have confirmed this site is not available for transit use.

CONCLUSION

The site was considered potentially suitable as a transit site subject to confirmation of an appropriate highway access off Old Bideford Road and appropriate noise and landscaping screening to ensure a satisfactory residential living environment. Following further investigation into site availability however, this site has been confirmed as unavailable for transit use.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0
Type of Use		Delivery Model		
Transit use		Public		

Appendix E – Other Sites Write Ups

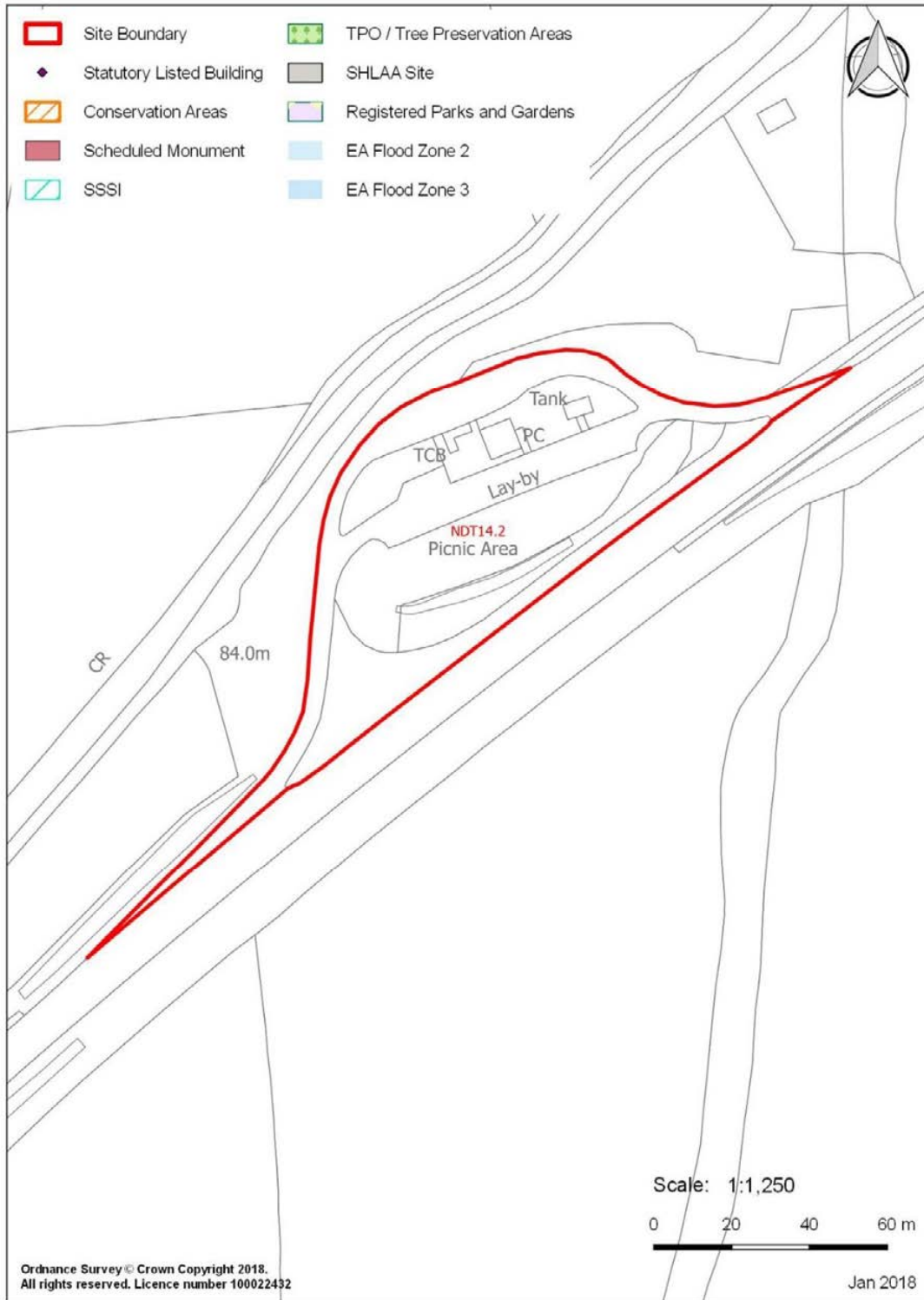
Site Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT14.2 - Disused lay-by north of the A39



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT29	Harvest Farm, Kentisbury, Barnstaple, Devon, EX31 4NU	
Source of Site	Local Authority	Size
Call for Sites	North Devon District Council	0.26 ha
Description of the Site		
<p>The site relates to established agricultural land currently in use as a cattle and sheep farm known as Harvest Farm. This site is located to the west of the village of Kentisbury accessed from the A3123. The piece of land put forward is relatively narrow but long section of field, treeline to the west and south and bordered by the access lane to the east.</p>		
Planning History		
<p>62134 - Agricultural building works prior notification for agricultural barn for storage of hay. Permission Granted 13/12/2016.</p> <p>57340 - Agricultural building works prior notification for erection of building for storage of hay. Permission Granted 15/05/2015.</p> <p>47298 - Agricultural building works prior notification for erection of hay barn. Permission Granted 26/09/2008.</p> <p>21536 - Outline application proposed erection of farmhouse. Permission Granted 01/05/1996</p> <p>19511 - Agricultural building notification in respect of proposed extension to agricultural greenhouse. Permission Granted 18/10/1994.</p> <p>19358 - Proposed siting of agricultural workers mobile home. Permission Granted 19/12/1994.</p> <p>18255 - Agricultural building notification in respect of extension to existing barn. Permission Granted 01/02/1994.</p> <p>18039 - Proposed erection of greenhouse and construction of fish raceway. Permission Granted 14/12/1993.</p> <p>16307 - Agricultural building notification in respect of erection of agricultural storage building. Permission Granted 18/11/1992.</p> <p>31330 - Agricultural building prior approval in respect of erection of agricultural barn for hay & storage use (renewal of 22339). Permission Granted 27/06/2001</p>		

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22339 - Agricultural building notification in respect of proposed erection of agricultural barn for hay storage use (amended description). Permission Granted 13/08/1996.

47217 - Agricultural building works prior notification for new roof on existing calf unit. Permission Granted 15/08/2008.

24928 - Agricultural building notification in respect of extension to barn. Permission Granted 06/02/1998.

21805 - Approval of details proposed erection of agricultural dwelling. Permission Granted 01/05/1996.

AVAILABILITY

This site was put forward by the owner through the Call for Sites process and therefore can be considered available for Gypsy and Traveller use.

SUITABILITY: Policy Constraints

Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)

DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: The site would have to be accessed from the A3123 road, which is a National Speed Limit where the width and alignment would allow speeds up to this limit. Assuming the existing access is used, Highways would have reservations about the available sight lines given the additional traffic movements generated by this proposed development. The required 215 metres are not available and there are little options for improving the existing. From a sustainability point of view, pedestrian journeys to local services, schools etc. are not an option. It is likely that this site would raise objections from the Highway Authority.

DCC Flood risk: No flood risk issues within the site boundary that Flood Risk Management are aware of.

Landscape (Enderby Associates Ltd): The site was difficult to view but comprises a long strip of pasture, separated from the rest of the field by a track which provides access to some farm buildings to the south. A tree belt forms the western and southern boundary whilst the eastern boundary is open. The North Devon AONB lies to the north of the A3123 which lies just beyond the northern boundary of the site. The edge of the Exmoor National Park (NP) lies approx. 1.5km to the east. The site is located in an elevated position with land falling gently to the east; consequentially it is potentially exposed to views

Appendix E – Other Sites Write Ups

from similarly elevated land on the opposite side of an intervening valley to the east (edge of National Park). It is located within the North Devon Downs LCA, an area noted for its High scenic quality ... contributing to the settings of the North Devon Coast AONB and Exmoor National Park where the strategy includes the protection of its quality and avoidance of visually intrusive development.

The site is therefore in a sensitive, elevated position and falls within the immediate setting of the AONB and National Park. The site is not considered to be a suitable location for G&T development.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant Issues in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: No comments provided.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No comments.

Environmental Health: No issues identified.

Housing Equality: Wouldn't have any reservations about this site. I would see it more for permanent pitches as opposed to a toleration site / temporary stopping site due to its 'far away' location.

ACHIEVABILITY

This site is unlikely to be considered suitable given the highways constraints

CONCLUSION

Based on the comments received from the County Council's Highways Officers and those set out in the Landscape appraisal, this site is not considered suitable for Gypsy and Traveller pitches. This is due to access constraints and the potential impact on highway safety and that the site is located in a sensitive, elevated position falling within the immediate setting of the AONB and National Park.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use	Delivery Model
Gypsy and Traveller	Private

Appendix E – Other Sites Write Ups

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT29 - Harvest Farm, Kentisbury, Barnstaple, EX31 4NU



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT42	Silcombe Wood, adjoining the Bish Mill junction on the A361 east of South Molton	
Source of Site	Local Authority	Size
Call for Sites	North Devon District Council	2.78 ha
Description of the Site		
<p>The site is accessed off a lane off the Bish Mill Junction off the A361, east of the village of South Molton. This is an area of dense woodland currently occupied by a caravan and occupant who creates and sells various wood products at the site entrance.</p>		
Planning History		
Unknown . map search unavailable for North Devon.		
AVAILABILITY		
If considered suitable this would still require confirmation from the current owner, in terms of whether this site could be available for Gypsy and Traveller use.		
SUITABILITY: Policy Constraints		
<p>Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)</p> <p>DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)</p> <p>North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: Highways have concerns relating to increased traffic movements through an access that is located so close to the A361 roundabout with relatively poor visibility for emerging vehicles. It is likely that this will raise objections from the Highway Authority. From a sustainability point of view, pedestrian journeys to local services, schools etc. are not an option. It is likely that this site would raise objections from the Highway Authority.</p> <p>DCC Flood risk: An ordinary watercourse is on the site boundary. Any alterations or works within the watercourse must be discussed with DCC Flood Risk Management and Land Drainage Consent requested and approved where necessary. The Risk of Flooding from Surface Water map shows a low risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible. There is a potential risk of</p>		

Appendix E – Other Sites Write Ups

groundwater flooding. A minimum of 12 months groundwater monitoring is required to assess the groundwater characteristics found at each individual site in order for an informed decision to be made on the conditions.

Landscape (Enderby Associates Ltd): It was not possible to view the whole site which appears to comprise a block of deciduous and coniferous woodland. The western end abuts the B3227 just south of the Bish Mill junction and has rustic timber boarded fence and gates with a caravan beyond occupying what appears to be a redundant section of former road. The only evidence of the use of the site is at entrance; the internal occupied part is well screened by vegetation between the site and A361. The site is located in the South Molton Farmland LCA where the character is affected locally by the disturbed corridor of the A361. There are no obvious landscape/visual constraints to the allocation of the currently occupied part of the site, which is very discreet and directly related to the highway network. There may also be potential for an additional pitch (i.e. 2 pitches in total) but this would need to be determined by viewing the site internally. The retention of the existing trees is of fundamental importance. The rest of the site is not suitable due to its steeply sloping topography and wooded character which is an intrinsic part of the character of this area.

SUITABILITY: Other Potential Constraints

Residential Amenity: Potential noise issues given the site is location in close proximity to the A361.

Environmental: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No significant environmental constraints.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No significant environmental constraints.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: No comments provided.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint

DCC Education: No education constraint

Property/ Estates: No response sought.

Environmental Health: No issues identified.

Housing Equality: Housing Equality wouldn't have any reservations about this site although would see it more for permanent pitches as opposed to a toleration site / temporary stopping site due to its 'far away' location.

ACHIEVABILITY

This site is unlikely to be considered suitable given the highways constraints.

Appendix E – Other Sites Write Ups

CONCLUSION

Based on the comments received from the County Council's Highways Officers due to the access constraints and potential impact on highway safety the site is not considered suitable for Gypsy and Traveller use.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use

Gypsy and Traveller

Delivery Model

Private

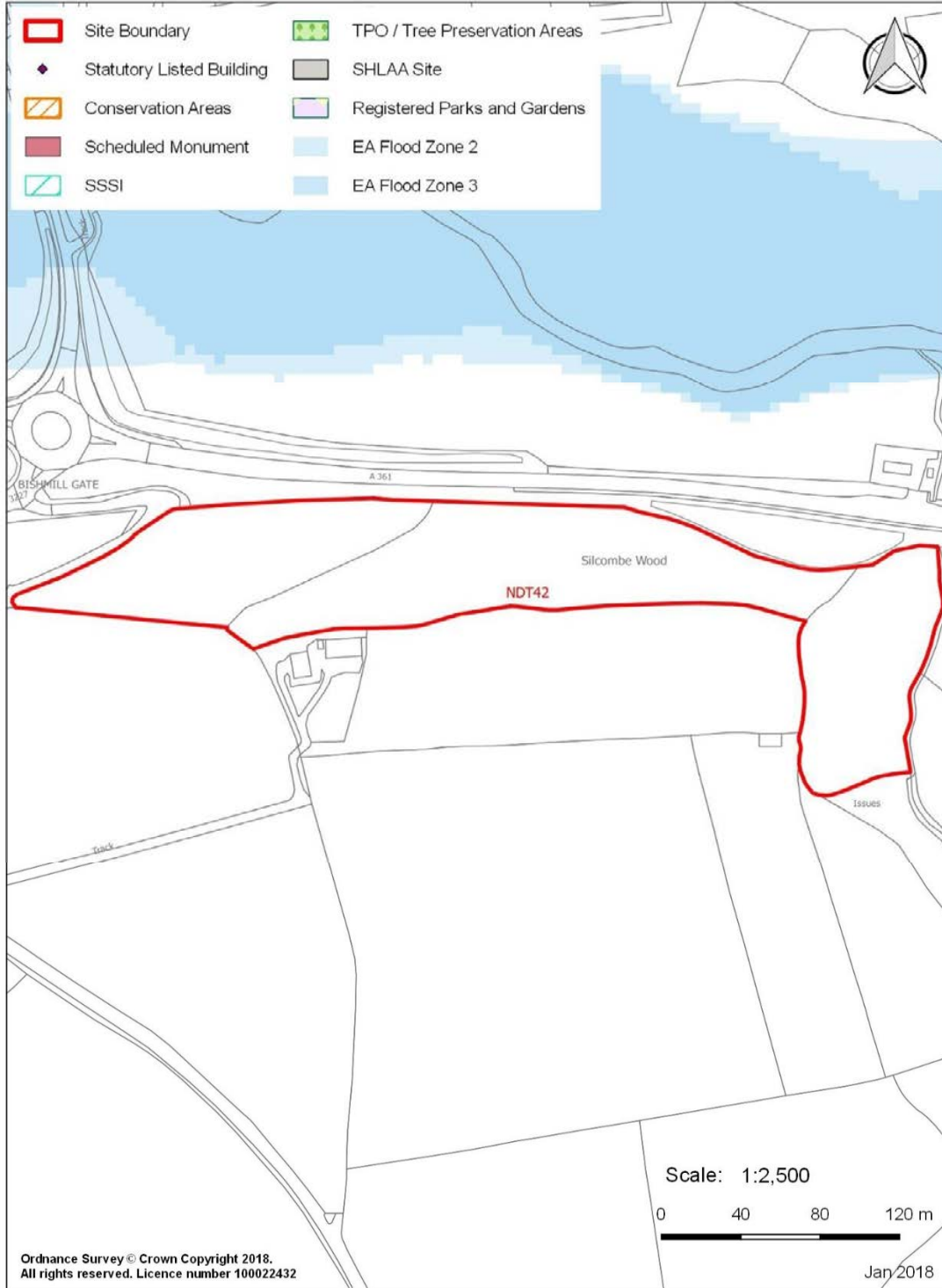
Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT42 - Silcombe Wood, adj. Bish Mill junction, A361 east of South Molton



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT43	Southern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB	
Source of Site	Local Authority	Size
Unauthorised Gypsy and Traveller Site	Torrige District Council	1.74 ha
Description of the Site		
<p>The site is situated in open countryside within the Parish of Bradworthy. The site is one of 3 sites which front a minor county road along its western boundary (see NDT02.1 and NDT02.2). These sites have been sub-divided to take account of the realities of ownership and site activity. The site appears to be occupied by several caravans, although this is not an existing Gypsy and Traveller site.</p>		
Planning History		
<p>1/1207/1990 - Retrospective application of the stationing of a residential caravan in connection with goat farming enterprise. Refused 21/08/1990.</p>		
AVAILABILITY		
<p>If considered suitable this would require confirmation from the landowner in terms of this being available for Gypsy and Traveller use.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>HSC11 . Gypsy Site Provision, DVT2C (Development in The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).</p> <p>North Devon and Torrige Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: Traffic passing the site is of low speed and volume. The access near to the cross roads is not ideal for turning manoeuvres in and out of the site but the low traffic means that banksmen could</p>		

Appendix E – Other Sites Write Ups

be used for such movements. An access further north, possibly in the northern section, appears acceptable. Consideration should be given to the remoteness of the site from services and facilities and the need to travel by non-car mode.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from surface water in areas. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible.

Landscape (Enderby Associates Ltd): The site comprises a large block of land contained to the south and west by rural lanes bordered mainly by partial hedges. The land falls gently northwards to the undefined boundary with site NDT2.2, with the eastern boundary formed by plantation woodland (Open Access Land). There are a number of caravans on the site with other sheds and stable structures, with most being located on the more elevated southern part of the site, with other structures and caravans located on the central eastern part of the site. Overall the site has a rundown appearance that is inconsistent with the well managed character and appearance of the adjoining farmland.

The site is located in the Western Culm Plateau LCA. Settlement within the area is primarily widely scattered compact farmsteads and the LCA strategy is to protect this sparse pattern, undeveloped character and sense of remoteness. Development within the site is apparent from the adjoining cross roads (Trentworthy Cross) and also in southerly views from the lane to the north, with caravans etc. apparent on the more elevated part of the site; these detract from the rurality and remoteness of the area.

The encroachment and change in character that has resulted from piecemeal development within the site constitutes an evident incursion into this deeply rural area which detracts from its natural character and the sense of remoteness; the existing uses also contribute to the cumulative landscape and visual effects of development that has occurred in sites NDT2.1 and 2.2 which are inconsistent with the distinctive sparse settlement pattern. From a landscape perspective the site is an unsuitable location for G&T development.

SUITABILITY: Other Potential Constraints

Residential Amenity: No significant issues apparent in terms of residential amenity for neighbours or future occupants.

Environmental Designations: Located in Flood Zone 1. No TPOs within the site. No significant environmental constraints. No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

Conservation and Heritage: No anticipated historic environment impact.

Development Management: This site is acceptable in terms of the wider landscape impact and for not

Appendix E – Other Sites Write Ups

having an adverse impact on neighbouring amenity. The big issue is the remote location, the poor road network and distance from any amenities. The site is subject to a range of enforcement issues, however details on these are confidential. The site is very isolated and therefore should only be considered as a last resort.

DCC Archaeology: No anticipated historic environment impact.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No response sought.

Environmental Health: No identified issues in terms of contaminated land, drainage/flooding, air pollution, noise, licensing and asbestos risk.

ACHIEVABILITY

The achievability of this site is largely dependent on providing the appropriate mitigation in terms of limiting impacts on the surrounding landscape.

CONCLUSION

Apart from the identified landscape constraints, the site is considered largely suitable for Gypsy and Traveller use. Given the Councils are short of a five-year supply there could be scope to reconsider this site in terms of whether a proposal for Gypsy and Traveller pitches could successfully be delivered, with limited impacts on the landscape.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0
Type of Use		Delivery Model		
Gypsy and Traveller use.		Private		

Appendix E – Other Sites Write Ups

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT43 - Southern Section - West Lodge, Bradworthy, Holsworthy, EX22 7SB



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT45	Seabreeze, Long Lane, Appledore	
Source of Site	Local Authority	Size
Call for Sites	Torrige District Council	0.65 ha
Description of the Site		
<p>The site lies to the west of the small grouping of development that is found around the conjunction of Broad Lane and Long Lane, to the south west of Appledore. It comprises a level grassed field, bound by hedge banks, in use as a touring caravan site. This is permitted by Article 5(1), First Schedule of the Caravan Sites and Control of Development Act 1960; allowing up to 5 caravans at a time on the site. The site operates for 12 months of the year. A cluster of three bungalows are found to the eastern boundary, with open countryside to the north and west, formed of agricultural field parcels. Long Lane runs along the southern boundary, offering vehicular access, provided through an opening with double-field gates in a modified hedge bank.</p>		
Planning History		
<p>1/0874/2012/FUL - Formation of new field access (and closure of existing). Permission Granted 04/02/2013.</p> <p>1/0551/2017/FUL - CL Store and Seasonal Supervisory Caravan. Permission Granted 04/02/2014.</p> <p>1/0139/2016/FUL - Full planning permission for the permanent siting of Lodge Accommodation and Store. Application refused 09/02/2016. Appeal Also dismissed. Reasons relating to adverse impact on the Open Countryside, Also insufficient evidence of the requirement for an additional dwelling within the Coastal Preservation Area.</p>		
AVAILABILITY		
<p>This site was put forward by the owner through the Call for Sites process and therefore can be considered available for Gypsy and Traveller use.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>HSC11 . Gypsy Site Provision, DVT2C (Development In The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage and Drainage).</p>		

Appendix E – Other Sites Write Ups

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Highways would have no particular issue with this site. They believe acceptable visibility is achievable. There is an acceptable footway link to the wider community.

DCC Flood risk: The Risk of Flooding from Surface Water map shows a high risk of flooding from surface water in areas on the site boundary. Any development must be accompanied by a suitable drainage strategy to deal with existing surface water flows and any potential increase in surface runoff. Sustainable Drainage Systems (SuDS) should be encouraged where possible.

Landscape (Enderby Associates Ltd): The site forms an open area of level grassland adjoining the western side of a cluster of properties grouped around a cross roads. Devon banks and low vegetation define most of the boundaries and the site is overlooked by two properties adjoining the eastern boundary. Level farmland extends a short distance to the north before giving way to the estuary and Northam Burrows (a Country Park). Land to the south rises up to a ridge providing vantage points looking over the land and the site below to Northam Burrows, the estuary and the sea. The site, although altered in character due to its existing use as a caravan site, forms an intrinsic part of the expansive, hinterland of the estuary. It straddles the Bideford Bay Coast and Taw-Torridge Estuary LCAs, although its characteristics are more representative of the latter with wide open views and a sense of wildness, where the strategy is to protect the high scenic quality and open character of the estuary. It also lies within the Coastal Preservation Area (CPA) where development should only be accommodated where there is a particular and proven need for the development.

SUITABILITY: Other Potential Constraints

Residential Amenity: Potential Issues with overlooking from adjacent properties.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No other significant environmental constraints. The site is identified as being in a Coastal Protection Area (CPA).

Conservation and Heritage: This is an open site on the edge of the Burrows and is close to the listed building at Oyster Cottage at the junction of Broad Lane and Long Lane. The site could impact on the open nature of the setting of the building but there are already low-density post war bungalows that have been constructed around the Burrows Gate area which break any direct views. The bungalows have been redeveloped in part and where this has been done every effort has been made to limit the height and mass of the resulting buildings to retain this low level feel in the area. Access for vehicles is difficult at the Long Lane /Broad Lane junction and the owner of the listed building has had a long battle with both district and county councils to try and limit use of this junction as access to the Burrows and Skern as

Appendix E – Other Sites Write Ups

long vehicles frequently damage the curved outer house wall.

Development Management: No comments received.

DCC Archaeology: No anticipated archaeological impact, no mitigation required.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Other (Landscape): This site is in the open countryside, within the CPA, adjacent to and visible from the North Devon AONB and bordering the area of mudflats known as The Skern which is an important feeding ground for birds. The caravan club CL site that currently operates here has no permanent structures and the only hardstanding is within the site entrance gate to satisfy highways requirements. The site is licensed for 12 months but only operates from late spring to autumn as access over the grassed field would not be possible during the winter. This means there is no long-term impact on the landscape character and the visual intrusion is only temporary, with the site returning to a greenfield when not in use. To use the site as a traveller site will require more permanent structures such as toilets, waste disposal areas and access track to hard standings for the generally larger caravans used by some travellers. This will have a significant impact on the character of the area and be a more permanent visual intrusion for users of Northam Burrows, the South West Coastal footpath that passes the site and the AONB. Therefore, the use of this site would be contrary to TDC environmental policies and is likely to be opposed by the AONB and local residents.

Property/ Estates: No comments received.

Environmental Health: The proposed site will be directly adjacent to domestic dwellings and the environmental impact on these properties may be high, with specific regard to noise nuisance, anti-social behaviour and waste related issues.

Housing Equality: No comments received.

ACHIEVEABILITY

The achievability of this site would be dependent on providing the appropriate mitigation in terms of limiting impacts on the surrounding landscape. Given the landscape constraints this site is unlikely to be considered suitable.

CONCLUSION

Given the associated landscape constraints in terms of introducing permanent structure into this sensitive location, this site is not considered suitable for Gypsy and Traveller use.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Appendix E – Other Sites Write Ups

Type of Use	Delivery Model
Gypsy and Traveller	Private

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT45 - Seabreeze, Long Lane, Appledore



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT47	Land adjacent to Canal Farm, Chilsworthy	
Source of Site	Local Authority	Size
Call for Sites	Torrige District Council	1.00 ha
Description of the Site		
<p>The site comprises a broadly rectangular agricultural field laid to grass and principally bound by hedge banks. The site is generally level with a slight fall to the south, lying to the southern extent of the built form of Chilsworthy. The site is principally surrounded by open countryside although some residential ribbon development runs away from the site to the north and south, whilst a sewerage works adjoins the western boundary. A highway linking Chilsworthy to Holsworthy flanks the eastern boundary of the site whilst a minor highway runs along the northern boundary, serving a built farm complex found to the north west. The site is currently accessed by a pair of field gate entrance to the southern boundary and adjoining the sewerage works to the north west. High voltage overhead power lines straddle the site east-west near to the southern boundary.</p>		
Planning History		
<p>1/0088/2015/OUTM - Outline application for 14 dwellings. Application Refused 07/05/2015/, Appeal also dismissed. Reasons for refusal include that it would: unacceptably extend undesirable ribbon development and the built form of Chilsworthy into the open countryside, harming its character and appearance. Only affordable housing would be acceptable in this location not solely market and location against the public sewage treatment plant</p> <p>1/1359/1988 - Residential development (2 units). Application Refused 13/09/1988.</p>		
AVAILABILITY		
<p>This site was put forward by the owner through the Call for Sites process and therefore can be considered available for Gypsy and Traveller use.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: Torrige District Local Plan (Adopted September 2004) (superseded subsequent to assessment)</p> <p>HSC11 . Gypsy Site Provision, DVT2C (Development In The Open Countryside); DVT6 (Local Distinctiveness); DVT7 (Building Design); DVT11 (Impact of Development on Amenity); DVT18 (Impact of Development on Traffic); DVT19 (Access and Parking); ENV1 (Conservation Interest); DVT24 (Sewerage</p>		

Appendix E – Other Sites Write Ups

and Drainage).

North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)

ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.

SUITABILITY: Physical Constraints

DCC Highways: Highways would have no particular with this issue with this site. They believe acceptable visibility is achievable. There is an acceptable footway link to the wider community.

DCC Flood risk: A Critical Drainage Area (CDA) is within the site boundary. There is a need for surface water to be managed to a higher standard than normal, to ensure any new development will contribute to a reduction in flood risks in line with NPPF.

Landscape (Enderby Associates Ltd): The site comprises a field of open pasture adjoining the southern edge of the largely linear village of Chilsworthy. The route of a former canal forms the northern boundary beyond which lies a ribbon of houses extending northwards into the village, the west side by a hedgerow and small sewage works, and the east by a road. A residential property is located on the east side of the road opposite the northern end of the site. An HV transmission line crosses the southern part with a pylon in the south west part of the field.

The site lies within the Western Culm Plateau LCA, an area noted for its expansive, elevated, folded landform interspersed with tributaries. The strategy for the area includes the protection of the open rural qualities of the landscape. The field, and the field opposite on the eastern side of the road, form an undeveloped area of countryside that lies between the village and a concentration of significant development (farm, poultry units and nursery) less than 200m to the south. The field is quite open to view when approaching and leaving the village along the road as well as being open to the landscape to the south west. It contributes to the setting of the village which is reasonably assimilated in the landscape by vegetation.

Development within the site would form an obvious and incongruous incursion into the landscape, detract from the village approach and setting, and would also reduce the separation with the area of significant development to the south. It would conflict with the strategy of protecting the open rural qualities of the LCA. The site is therefore considered to be an unsuitable location for G&T development.

SUITABILITY: Other Potential Constraints

Residential Amenity: Residential amenity issues associated with the adjacent sewage works

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No other significant environmental constraints.

Conservation and Heritage: There are no listed buildings nearby but the site is adjoining the old canal

Appendix E – Other Sites Write Ups

which has heritage value. Having said that this site is very flat and the character of the landscape open with sporadic linear development as you approach Chilsworthy from the south. Traditionally there has been a travelling community close by in the nearby Gypsy Lane to the south of the site.

Development Management: No comments received.

DCC Archaeology: No anticipated archaeological impact, no mitigation required.

DCC Minerals: No mineral constraint.

DCC Education: No education constraint.

Property/ Estates: No comments received.

Environmental Health: The site identified was the subject of a previous planning application (1/0088/2015) for 14 no. dwellings. The application was refused for a number of reasons, one being the close proximity to the sewage works and its potential adverse impact on residential amenity. The applicant appealed the decision but the appeal was dismissed with the odour/noise reason being upheld. Odour and noise impact would need to be considered along with any potential land contamination. No asbestos or drainage/ flooding issues identified.

Other (Landscape): Development of 14 dwellings on this site has previously been refused at appeal, the inspector stated: *“therefore conclude that the construction of these new dwellings would be harmful to the rural character and appearance of the area and as such they would be contrary to the objectives of Policy DVT2C of the Local Plan and the Framework which seek to ensure that development does not detract from the character or appearance of the area”*. Again, the infrastructure required for a travellers site would be permanent, and when the site was not in use would still have an impact on the landscape character of the area. The site is on the southern edge of the village immediately adjacent to current housing, there would be significant local opposition to placement of a travellers site immediately adjacent to these dwellings.

Housing Equality: No comments received.

ACHIEVABILITY

Following the landscape appraisal this site is not considered suitable for Gypsy and Traveller use.

CONCLUSION

The site is not considered suitable for Gypsy and Traveller use, given the associated landscape constraints as set out in the landscape appraisal and also the close proximity to the sewage works and its potential adverse impact on residential amenity.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use

Delivery Model

Gypsy and Traveller

Private

Appendix E – Other Sites Write Ups

Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT47 - Land adjacent to Canal Farm, Chilsworthy



Appendix E – Other Sites Write Ups

Site Ref	Site Name/Address	
NDT48	Tween Moors Cross, Lay-by West of Horse Hill Lane	
Source of Site	Local Authority	Size
Unauthorised Tolerated Trespass Site	North Devon District Council	0.04 ha
Description of the Site		
<p>The site includes a lay by on the left-hand side of Horse Hill Lane (just north of Tween Moors Cross) which is currently being used as a temporary stopping place. At the time of the site visit a caravan and van occupied the site. The lay has been tolerated as a transit site for at least 3 years.</p>		
Planning History		
<p>There is no planning history on this site (apart from enforcement investigations)</p>		
AVAILABILITY		
<p>If this was considered suitable it would require confirmation from the County Council Highways Authority to confirm the land was available.</p>		
SUITABILITY: Policy Constraints		
<p>Saved Policies: North Devon Local Plan (Adopted July 2006) (superseded subsequent to assessment)</p> <p>DVS1 (Design), DVS2 (Landscaping), DVS3 (Amenity Considerations), ENV1 (Development in the Countryside), ENV7 (Agricultural Land), TRA6 (General Highway Considerations)</p> <p>North Devon and Torridge Local Plan (at examination at time of assessment, now adopted)</p> <p>ST20: Providing for Traveller Communities; Policy DM30: Sites for Traveller Accommodation.</p>		
SUITABILITY: Physical Constraints		
<p>DCC Highways: No comments provided.</p> <p>DCC Flood risk: No comments provided, however the site is located in Flood Zone 1 and therefore limited risk of flooding</p> <p>Landscape (Enderby Associates Ltd): The site is a lay-by alongside a narrow rural lane, located within an elevated, open and very rural position, close to the summit of a ridge, within the Witheridge and Rackenford Moor LCA. Here the moors are noted as having a remote and wild character, with a lack of settlement and absence of lighting away from main roads. Settlement is limited to scattered farms located alongside or set back from the lanes and the site is positioned on a ridge where the land falls away to the north and south; consequently, the site is in a prominent, elevated and deeply rural location</p>		

Appendix E – Other Sites Write Ups

and existing use (which consisted of a large caravan and van at the time of the site visit) is conspicuous and incongruous in this open landscape setting.

SUITABILITY: Other Potential Constraints

Residential Amenity: potential issues with access to water and waste disposal.

Environmental Designations: Located in Flood Zone 1 and therefore limited risk of flooding. No TPOs on site. No other significant environmental constraints.

Conservation and Heritage: No comments provided, however this doesn't appear to affect any heritage asset.

Development Management: No comments provided.

DCC Archaeology: No comments received.

DCC Minerals: No comments received.

DCC Education: No comments received.

Property/ Estates: No comments received.

Environmental Health: No comments received.

Housing Equality: No comments received.

ACHIEVEABILITY

In order to deliver a transit site in this location it would require some dividing road infrastructure to ensure highways safety, or the relocation of the site access. Confirmation would also be required from DCC to ensure this site was available for Transit use.

CONCLUSION

This site is not considered suitable for transit use given its limited size, which is unlikely to be able to successfully include the appropriate infrastructure to ensure highway safety.

DELIVERY: Potential Yield

2018-2023	2023-2028	2028-2033	2033-2034	Total 2018-2034
0	0	0	0	0

Type of Use	Delivery Model
Gypsy and Traveller	Public

Appendix E – Other Sites Write Ups

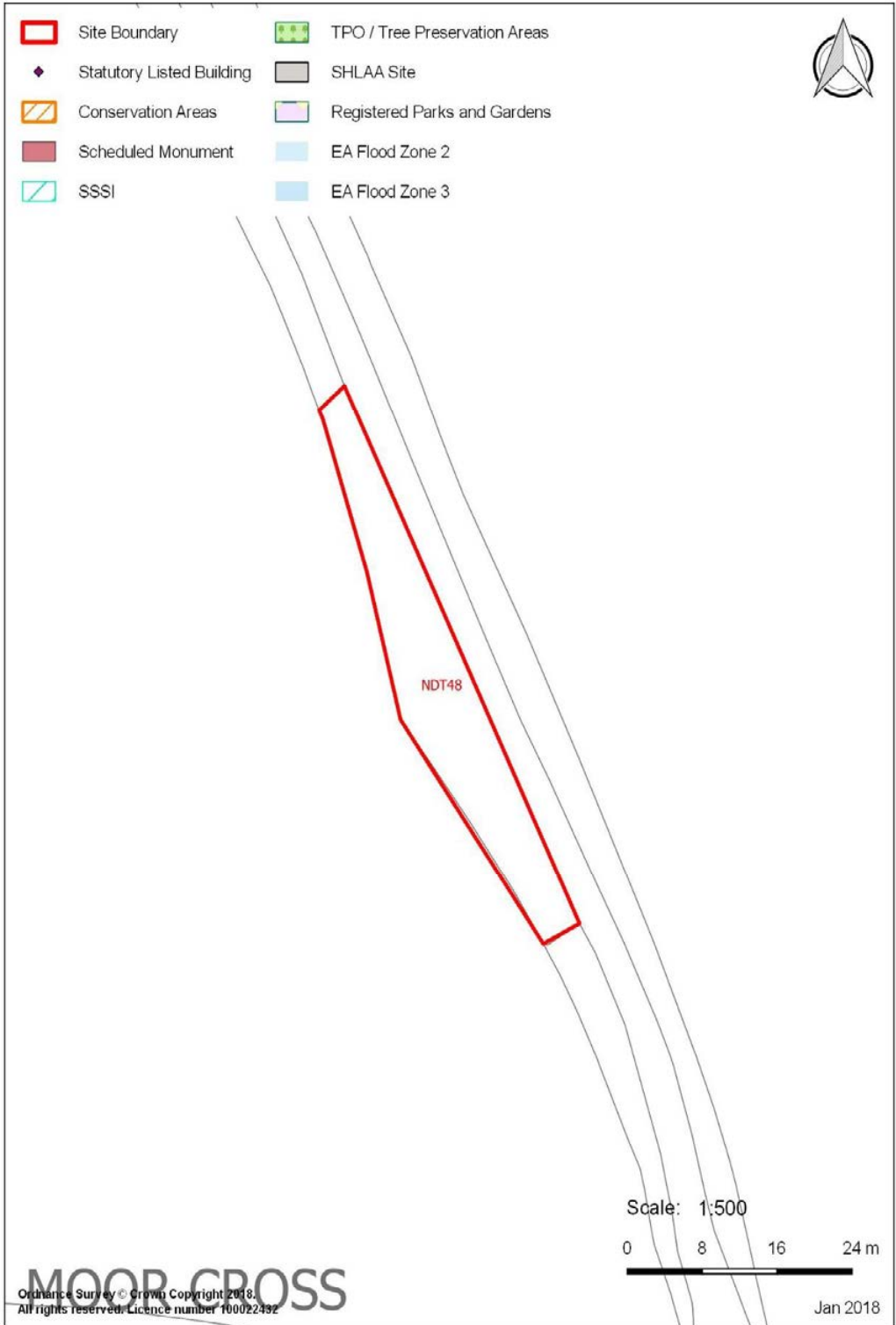
Photos



Appendix E – Other Sites Write Ups

Site Map

Site: NDT48 - Tween Moors Cross, Layby West of Horse Hill Lane



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