

Girton Parish Council

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The Pavilion
Girton Recreation Ground
Cambridge Road, Girton
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Minutes of the Extraordinary Parish Council Meeting held at 7.30pm on Wednesday 7th October 2009 at St Vincent's Close Community Centre

Present: Cllrs D de Lacey (Chairman), R Hiley, V Godby, J Thorrold, R Gordon, B Bromwich, C Starling, M Wilson, L Sparling, P Starling, & M Taylor.

09/115 Welcome from the Chairman

The Chairman welcomed Members, and Dr J Ash to the meeting.

09/116 Apologies

Cllrs Clift, Martin, and Ford-Smith.

09/117 Members' declarations of interest for items on the agenda

None.

09/118 Public Participation session on agenda items & matters of mutual interest

1. **Dr J Ash** - gave a presentation on South Cambridgeshire District Council's Gypsy and Traveller Development Plan Document (GTDPD) as an informed, and independent resident of Girton. His aims were to outline the key aspects of SCDC's plan including the issues and options report; sustainability appraisal; and to explain the background arising from the East of England Regional Assembly's recommendations for our region. Throughout his talk he referred to gypsies and travellers as caravanners, as a neutral non racial term.

His analysis of risk management included the concepts of hazards and risks defining these respectively as a situation that could lead to harm, and something that could happen in relation to hazard. Aspects of risk management in relation to caravan sites included the potential hazards of crime, the potential affect on property values, and environmental affects and values.

Risk Management choices were: to do nothing; to accept the plan subject to mitigating measures being taken; or to reject and fight against the proposal in the development plan that multiple caravan sites should be placed in the immediate vicinity.

During the questions and answers that followed a number of important issues emerged.

- Gypsies and travellers were distinct and separate minorities with different needs, and should not be treated as if they were one community.
- They had separate and distinct traditions and values.
- They preferred to live in different sized communities in some instances purchasing land to establish homes.
- Work and employment issues were not necessarily the same but choice of location was important to meet their needs which traditionally may have followed the seasons, and harvest; or fair grounds and grazing land for horses.
- Education opportunities were important but not necessarily always pursued to secondary level by travelling communities.

Discussion about South Cambridgeshire District Council's role highlighted that it had more travellers than other areas and had had to spend significant monies on dealing with illegal encampments. Like other local authority districts it had accepted Government targets to provide sites for gypsies and travellers. However, the biggest flaw in SCDC's plan was its failure to address the needs of these communities. For example no allowance had been made for access to land for horse breeding. Furthermore allocating sites on a standard basis of 10 pitches did not recognise that gypsies and travellers congregated in different size communities. Sites should offer a range of facilities and accommodation, and be safe and well managed, and environmentally sound not allocated on newly available building land merely to meet government targets for the district. Other factors such as education and health facilities needed to be explored in consultation with travelling communities. If poor administrative decisions were taken they could have a detrimental affect on everyone moving to new housing developments in the area, and on existing residents.

2. Members of the public – None present.

09/119 Business items requiring a decision, or consideration by the Council

1. To approve the sending of a letter to the Chief Executive of South Cambridgeshire District Council (SCDC) on the GTDPD exercise.

Prop: Cllr de Lacey Sec: Cllr Godby

The Chairman commented that the tabled draft letter did not reflect comments received from Cllrs Hiley and Martin. Cllr Hiley said that the draft did not make it clear what Girton Parish Council's concerns were. If these were that the SCDC exercise had been done in a slipshod manner the letter should say so. Cllr Martin considered that the final sentence making reference to legal action should be omitted. This amendment was formally proposed by Cllr de Lacey, and seconded by Cllr P Starling, and was approved by majority of 7.

The Council voted to approve sending the amended letter at Appendix A by majority vote. (7 for, 1 against, and 1 abstention)

2. To approve a response to the SCDC GTDPD Consultation.

Prop: Cllr de Lacey Sec: Cllr Thorrold

The draft response was tabled and discussed in detail. The version at Appendix B was approved by unanimous vote.

3. To approve a response to the SCDC Gypsy and Traveller Strategy proposals.

Prop Cllr de Lacey Sec: Cllr C Starling

Cllr C Starling objected to transit sites being attached to the proposed new developments. The existing transit sites were well managed and run.

Cllr Hiley was concerned to demonstrate that our real grounds for objection to SCDC's strategy were that it had not been produced based on the needs of the travelling communities. If these were to the fore a good rapport could be established. He proposed, and the Chairman seconded, an amendment to Girton Parish Council's draft comments on SCDC's strategy document, as follows:

“A major concern should be that we can provide within a policy a strategy that could allow travellers and settled communities to live side by side. Our comments arose solely from a concern that this current approach will not achieve this objective.”

Cllr Wilson was supported by other Members when he proposed removing reference to the A14 in the fifth paragraph.

The amended document at Appendix C was approved by majority vote (6 in favour, 1 abstention).

The meeting ended at 9.15pm

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Appendix A

Mr G Harlock
Chief Executive Officer
South Cambridgeshire District Council
Cambourne
Cambridgeshire CB23 6EA

12th October 2009

Dear Mr Harlock,

CONSULTATIONS ON GYPSIES AND TRAVELLERS

I am instructed by Girton Parish Council to address the following letter to you.

Girton Parish Council is aggrieved at the paucity of proper care evident throughout the documents. It formally requests that:

1. The ‘vision’ be amended as indicated below.
2. Full risk assessments be conducted for crime and environmental risk for both prospective site 4 and 5 prior to any further administrative action being undertaken.
3. All such assessments be made with full and prior consultation with members or representatives of Girton Parish Council.
4. South Cambridgeshire District Council conduct a full investigation under the jurisdiction of an independent person into the manner in which the site selection procedure has been undertaken to date.

Mindful of its responsibilities to the diverse current and potential future population of Girton, the Parish Council has elected to respond to the site allocation proposals wholly by reference to potential site users identified non-rationally. It will therefore in this context make reference only to ‘caravanners’ – a broad non-racial classification as defined in the Oxford English Dictionary. As neither the Race Relations Act (1976), nor the subsequent case law (eg CRE v Dutton, 1989 ; O’Leary and others v Punch Retail, 2000) recognise ‘caravanners’ as a minority group, any attempt to reject the proposals and comments contained in this letter on grounds of racism will be identified as a deliberate misapplication of the law. Any such malfeasant or misfeasant action shall be regarded as provocative.

Girton Parish Council deplores the lacklustre approach to decision-making and duty to the public trust evident in the policy as stated in the ‘Vision’ at paragraph 3.2. The statement consist of three sentences, all of which it judges to be unfit for purpose, and in two cases, potential incitement to offences under the Race Relations Act (1976). These will be considered in turn.

“South Cambridgeshire contributes fully to the regional provision of...accommodation, meeting the needs of existing and future generations in appropriate locations with well-designed sites” (edited to exclude potentially offensive material).

Clearly, if the needs of future generations are to be met, the sites will have to be more than ‘appropriate’, a term that suggests that suitability will be judged for the administrative convenience of the local authorities.

Sites should be provided in ‘healthy, safe, environmentally sound and socially supportive locations’, or not at all. To consign caravanners to the areas least inconvenient from an administrative perspective is to treat them unfavourably in comparison with other members of the community – and that is unlawful. Moreover, by mentioning only two cohorts of the population, this proposed policy is discriminatory against other members of the caravanner community.

“There will be a range and choice of accommodation, including at major growth areas, which will contribute to the improvement of living conditions”.

Accommodation that does not guarantee healthy, safe and socially supportive conditions discriminates against potential caravan site users and should not be offered.

“Occurrences of illegal and unplanned... encampments and development will be reduced”.

This is in conflict with the sustainability objectives at Annex B, which include at objective 5.2:

‘Reduce and prevent crime, and reduce the fear of crime’. Failure to repeat the word ‘prevent’ in this sentence suggests that the minimum effort to uphold the law will be accepted. In addition, a proper care for public safety and intention to expunge the fear of crime would be indicated if the word ‘reduced’ was replaced with ‘eliminated’. That is surely the least aspiration the citizens of south Cambridgeshire have a right to expect, and to offer less implies a deliberate intention to be derelict or negligent in the duty owed to the community.

The prospective plan objectives at paragraph 3.4 are similarly flawed. References to minority groups should be amended to ‘caravanners’ throughout in order to eliminate the potential for discrimination. Other changes to address significant omissions (indicated in italics) include:

“To address the full range of land-use and planning issues, including *health, safety, environmental risk, socially supportive circumstances and all other aspects of sustainability* and good design, that need to be taken into account regarding...”

“To ensure an adequate and appropriate supply of *healthy, safe, environmentally benign and socially supportive* sites to meet the numbers required by the East of England Plan in South Cambridgeshire”.

“To provide a clear framework for making decisions on planning applications regarding *accommodation sites for caravanners*”.

“To *eliminate by all lawful means* unauthorised encampments and unauthorised developments”.

The Parish Council is persuaded that entirely insufficient care has been exercised in respect of the assessment of sites 4 and 5. The report by the contractors shows a deplorable lack of sound information on which to base safe, proper and acceptable judgements. In particular, the report contains no adequate reference to proper environmental impact assessment of either the former NIAB land or the University farm. The failure properly to identify any residual hazards following the experimental use of these lands is almost certain to be culpably reckless. It certainly suggests wilful negligence to anyone who has experience of environmental auditing, as the presence of any harmful biological (including trans-genetic), chemical or radioactive materials used in the research programmes will constitute a hazard to any person inhabiting the site. That may be particularly the case for families with children.

A separate enquiry made on behalf of the Parish Council to Cambridgeshire Constabulary under the Freedom of Information Act revealed that no information was held regarding any formal risk assessment of crime regarding either caravanners’ sites, or of the community of Girton. Therefore, no proper assessment of this issue has been conducted of the sustainability of utilising sites 4 or 5 for caravanners.

Yours sincerely,

Robert Stone
Clerk to Girton Parish Council

Girton Parish Council: GTDPD Response

Response submitted to the LDF Website, 8. 10. 2009

In all cases but the first ('Comment') the responses were registered as 'Object'. Page numbers refer to the pdf version of the I&O2 Report.

'PURPOSE OF THE GYPSY AND TRAVELLER DEVELOPMENT PLAN DOCUMENT

1.6 The Gypsy and Traveller Development Plan Document (GTDPD), as part of the Council's LDF, will form a vital tool for implementing the council's Gypsy and Traveller Community Strategy, and will set out policies and proposals as they relate to planning for Gypsies and Travellers, and Travelling Showpeople in the district, covering the period 2006 – 2021.' (19)

This is a key statement. If the Council does not get this right it will condemn both settled and travelling communities to more than a decade of misunderstanding and lost opportunities before the issues are likely to be re-addressed.

'1.9 The problems associated with unauthorised sites, such as ... the tension that exists between Gypsies and Travellers and the settled community ... will continue unless appropriate provision is made.' (20)

They will not just 'continue'; they will be exacerbated if inappropriate provision is made. 'Appropriate' must mean 'healthy, safe and socially supportive and where the law is seen to be enforced vigorously and expeditiously'.

'3.2 The following vision is proposed for the GTDPD:

South Cambridgeshire contributes fully to the regional provision of Gypsy and Traveller and Travelling Showpeople accommodation, meeting the needs of existing and future generations in appropriate locations with well-designed sites. There will be a range and choice of accommodation, including at major growth areas, which will contribute to the improvement of living conditions. Occurrences of illegal and unplanned Travelling encampments and development will be reduced.' 'Reduced' is an inadequate goal. Substitute 'addressed vigorously and expeditiously in all cases'.

'QUESTION Q1:

Do you agree with the vision?' (29)

No. Girton Parish Council cannot agree with the vision as stated, because the preamble is false. Because of the chosen methodology the 'range' of sites offered is unfairly restrictive, and in much of the District will offer no improved conditions for caravanners. Hence the occurrence of illegal and unplanned settlement is not likely to be reduced, while our own community will be put under unreasonable pressure with 40 pitches proposed in our vicinity.

'3.4 The following objectives are proposed: ... (29)

The statement of the first bullet point has not been subjected to assessment: the "range" is not spelled out. And issues leading to the betterment of the caravanning communities (for instance, site sizes) have not been addressed at all. Girton Parish Council is aggrieved at the paucity of this objective. On the second bullet-point: (a) The supply is not "adequate" in that large areas of the District are left without facilities (including transit opportunities) for the caravanning community. (b) Sites must not be merely "appropriate", but "healthy, safe and socially supportive".

On the third bullet-point: The very clarity will discriminate against caravanners who wish to settle in most of the District, and is therefore discriminatory. Girton Parish Council is aggrieved at the paucity of this objective.

On the final bullet-point: Since the Strategy is still in its Consultation phase, there is no way of knowing whether this is realistic. But in our view, given our critique of the Strategy, this objective will not be realised by this proposed policy.

‘QUESTION Q2: Do you agree with the objectives of the plan? Should alternative objectives be used?’ (30)

No, and Yes. The stated objectives do nothing to address the needs and concerns of either community. A better considered set of objectives, realistic explicit and measurable, must be framed which will demonstrate the supposed claim to meet the needs (including freedom to travel, freedom from fear of oppression or crime) of all members of our community.

‘5.4 The assessment has focused on sources of land that the council can have confidence can be delivered, a key requirement of the GTDPD. These sources are:

- _ Sites suggested through public consultation.
- _ Extension of existing authorised sites.
- _ Land with temporary planning permission as Traveller sites.
- _ Currently unauthorised Traveller sites.
- _ Former council run Travellers sites.
- _ Land in public ownership.
- _ Major developments.’ (33)

This is unfairly restrictive. SCDC does have powers of compulsory purchase, and therefore suitable land in private ownership should be included. It is not adequate to argue (as may be the case) that no landowner has offered property. Sites in private ownership should be subject to the same assessment as Council land or development sites, so that landowners can be approached on behalf of the caravanning community.

‘QUESTION Q3: Do you know of any additional sites/land within the district that might be suitable and available that should be considered?’ (35)

This is the wrong question. It is the responsibility of the Council, not of individuals, to source appropriate sites. In order to provide a better spread of opportunities to the travelling community, the Council must accept its obligation to investigate sites in private ownership.

‘THE THREE TIERED SITE ASSESSMENT PROCESS

6.2 The site assessment process has been divided into three ‘tiers’, each looking at a different aspect of the suitability of a site. Further information and the site assessment criteria are included in the Technical Annex – Section A, but the broad approach is outlined here.

6.3 The three-tiers are as follows:

Tier 1: Location & Key Constraints

Tier 2: Infrastructure

Tier 3: Impact, Access and Deliverability’ (37)

Girton Parish Council objects to this selection of criteria. (a) The Tier 1 criterion makes unwarranted assumptions about the nature of facilities available in Rural Centres and Group Villages. (b) Tier 2 unreasonably rejects the results of the I&O report 1 (see Technical Annex 3). (c) Measuring distances ‘as the crow flies’ is inappropriate. These criteria appear to be for officer convenience, not for community benefit and this suggests malfeasance.

‘Table 2: Site Options for Consultation’ (42)

No justification is given for the unit of 10 pitches which appears to be used throughout the exercise. This is inappropriate both for Gypsies (who we gather from discussion with representatives would prefer smaller units) and for Travellers (who we gather from discussion would prefer larger units). It is therefore an arbitrary and discriminatory choice. Girton Parish Council is aggrieved that such inappropriately-sized units might be placed in our vicinity.

‘Conclusion: North West Cambridge between Huntingdon Road and Histon Road offers a good opportunity to integrate new site provision with this major new development, so that it meets the needs of all sectors of the community.’ (52)

Since no justification is given for the number of pitches (10); and no demographics offered to

suggest an appropriate size of school and the likelihood of it being provided; this site cannot be regarded as deliverable.

There is also no assessment of the appropriateness of what will be a suburban area as suitable to the needs of travelling people.

Further, this is land which has been used for experimentation, including the growing of GM crops.

There is therefore a presumption that the land will be heavily contaminated with chemicals, GM waste and possibly radio-isotopes. In the absence of a fully comprehensive site soil analysis and risk assessment, Girton Parish Council regards granting permission for its use by a vulnerable mobile population as a failure of duty of care.

‘Conclusion: The site [University Farm] offers a sustainable location on the edge of Cambridge, and an opportunity to integrate new site provision into a major new development, so that it meets the needs of all sectors of the community. However, there are key policy differences between this site and the other major developments which need to be considered.’ (54)

As it stands this statement is vacuous. The purpose for removing this land from Green Belt did not include accommodation for caravanners; the Council has a duty to explain – before the consultation – whether this would be an acceptable purpose. In the absence of such an explanation the site should be withdrawn.

‘Given the scale of the new town [Northstowe] the option put forward is based on two typical sites of 10 pitches.’ (56)

(a) Given that the masterplanning for Northstowe is virtually complete, the option must indicate and justify the location of the sites. (b) No justification is offered that 2 sites of 10 pitches rather than (say) 4 sites of 5-8 each; and/or one of 15 are most appropriate. Girton Parish Council after consultation with representatives of the Gypsy and Irish Traveller communities regards 10 as the wrong size and requests that the sites should be withdrawn.

‘There are locational advantages in linking some new site provision with major new developments. It will help to mainstream Gypsy and Travellers site provision, addressing it as part of general housing needs. It reflects government guidance in Designing Gypsy and Traveller Sites – Good Practice Guidance which states that

‘Where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments.’ Some Gypsies and Travellers have a preference for some detachment and rural locations, but this does not preclude suitably designed provision as part of major developments. Sites could be delivered through section 106 agreements between the council and developers. Only healthy, safe and socially supportive sites should be delivered.

‘OPTION OPT5:

Sites delivered through major developments should be within but on the edge of a development, or outside but in close proximity except in the Green Belt.’ (88)

Even the edge of many sites (particularly 4 and 5) will not be “rural”. If pushing sites to the edge is simply a way of trying to make them more acceptable to the settled population, it is discriminatory. The land-take for new development is already hotly disputed, and the location of extra land for caravanners should not be permitted to increase the overall site location by stealth. Hence all pitches should be within the envelope of any new developments, and certainly not relegated to the side of a busy major road.

‘OPTION OPT6:

The GTDPD should include a policy covering specific issues relating to the design and location of Gypsy and Traveller sites within or close to major developments, covering the following issues:

1) The site should be located within or on the edge of, but closely related to, the Major Development. Sites in the Green Belt would not be appropriate, unless exceptional circumstances can be demonstrated at the masterplanning and planning application stage. This should be re-worded as ‘ The site should be located within, and closely related to, the Major Development. Sites in the Green Belt shall not be appropriate.’

‘OPTION OPT7:

Major developments should be required to provide a specific number of pitches through

the GTDPD, and how that number is split into individual sites should be left to masterplanning of the development.’ (89)

This is an evasion of responsibility. (It also contradicts the ‘two typical sites of 10 pitches’ on p43.) Masterplanners should either be given the sizes of individual sites (agreed with the local travelling population) or required to consult potential users on appropriate sizes.

‘OPTION OPT8:

Delivery of sites should be phased so that key services and facilities are available before Gypsy and Traveller pitches are completed.’

Replace ‘should’ with ‘must’ or ‘shall’. There can be no exception to this requirement.

OPTION OPT9:

‘Gypsy and Traveller pitches should be delivered early in a development, so that sites are established before most of the development takes place but before key services and facilities are available.’ (90)

Insert ‘not’ between ‘but’ and ‘before’.

‘Option OPT12’...

‘DRAFT POLICY GT1: SITES FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ON UNALLOCATED LAND OUTSIDE DEVELOPMENT FRAMEWORKS’ (94)

Paragraph (1): After ‘primary school’ add ‘with adequate class space and resources to provide proper schooling for the expected children without any disruption to the existing settled community’.

Paragraph (4): Add ‘and without any disruption to the existing settled community’. ‘Services’ must be understood to include policing.

‘OPTION OPT13:

The GTDPD should include a policy regarding design of Gypsies, Travellers and Travelling Showpeople sites.’

DRAFT POLICY GT2: DESIGN OF GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE SITES ... 5) The site is not located on contaminated land, unless the land is capable of adequate amelioration prior to occupation’ (97)

Add ‘Land previously used for experimental agricultural purposes shall be regarded as contaminated until duty of care has been exercised in the form of a full and thorough risk assessment.’

‘APPENDIX B. SUMMARY OF THE SUSTAINABILITY APPRAISAL Note: This a copy of the Non-Technical Summary of the Initial Sustainability Report prepared by consultants Scott Wilson. The full Initial Sustainability Report is also published for consultation and available separately.’ (127)

Girton Parish Council regards the Sustainability Report prepared by consultants Scott Wilson as not fit for purpose in its present form, and that dependence upon it shall be regarded as a failure to exercise due diligence.

It is unacceptable that the Transit Site option has been chosen only because the site is deemed unsuitable for permanent occupation, and with no reference to the needs of the travelling communities for suitably-sited transit. This is a failure of duty of care.

Girton Parish Council: GT Strategy Response to South Cambridgeshire District Council

Our major concern is to provide within this policy a strategy that could allow travellers and settled communities to live side by side. Our comments arose solely from our concern that the current approach by south Cambridgeshire DC will not achieve this objective

It is regrettable that, from the first sentence of the Executive Summary to the penultimate page, the Gypsy and Traveller Community Strategy Draft Strategy (quaintly entitled 'Abbreviations') consistently fails to distinguish between the two communities of Gypsy and Irish Travellers (not to mention, of course, others like New Age who are also subsumed under the title 'traveller'). We wish to see not merely acknowledgement of their differing needs, but clear indications of how they may be met.

The 'vision' given (9) seems remarkably minimal, and absent from the parallel GTDPD consultation which should be informed by it:

'To ensure that Gypsy and Traveller communities enjoy equality of service and are part of cohesive communities within which people from different backgrounds participate together and share equal rights and responsibilities.'

Putting arbitrarily-sized groups of pitches on the fringes of developments is no way to establish, or even promote, cohesion. 'Equality of service' hides a number of problems (eg if service requires the recipient to be literate). We wish to see an indication of the employment opportunities which the 'vision' envisages for Gypsies and/or Travellers who wish to come to settle, temporarily or permanently, in the District. We also wish for far greater clarity on how access to education and health care is to be provided in ways appropriate to the needs of these communities which will not adversely affect the settled community.

Objectives (p5): what is the difference between 'promote' and 'positively promote'? 'Ensure that the accommodation and other needs of Gypsies/Travellers are met whilst taking account of cultural issues or specific requirements' would look discriminatory to a homeless member of the settled community. 'Other needs' will clearly include employment opportunities, and since many of the traditional functions of these communities are no longer available, it is incumbent on the Council to explain how the Strategy will contribute to permitting or providing gainful employment. Key priority areas (5): 'Raising awareness of Gypsy and Traveller culture, the duty to promote equality and practical ways to achieve this' (5, repeated at 9) does not seem to make sense.

However, Girton Parish Council feels SCDC should first discuss with Gypsies & Travellers whether all of their culture **can** be preserved, especially in the light of wider issues (note 'The population of the district is undergoing a transition' p7).

'Providing strategic direction and co-ordination' (5) is vacuous.

'Our vision' (13) includes 'opportunities for employment' (cf Aims 4). How have these been assessed with reference to the identified pitches in the DPD exercise? Availability of local gainful employment should be a criterion in the selection of pitch locations.

Sustainable Communities Strategy (14f) commits the LSP to 'Safe and clean communities' (15). Residents of villages seeing increased littering and threats of withdrawal of services because of cuts will wish significant **increased** policing of littering where people whose jobs may involve recycling may be encouraged to settle.

'Most Gypsies & Travellers in Britain live in houses' (25). This claim needs supportive evidence since it is conceded that getting data on numbers is very difficult; and is at best irrelevant in the light of 'In South Cambridgeshire, 90% of the households live in caravans' (38). So why is it cited

here?

'Improving the Education Outcomes of Gypsies and Travellers' (26) is a key area of any strategy to better the lot of these communities. but SCDC must be careful to ensure this is not achieved at the expense of the education of the settled community. However, in the light of recent reports that some smaller primary schools in the County are in danger of closing, there seems here an excellent opportunity her for co-operation with CCC in widening the scope of the GTDPD exercise.

Priority 1 ('Raising awareness of Gypsy and Travellers culture and the duty to promote equality', 29). What does 'showing clear leadership on Gypsy and Traveller matters' mean? If we are to promote equality, it should be of everyone. SCDC must be careful not to be seen to discriminate against members of the settled community. not promote a positive impression of Polish and of African refugees – why not?

What is 'good practice' in bullet 6 ('The Equality and Diversity Steering Group publishing and disseminating good practice')? Practising what?

Priority 3 ('Establishing two-way engagement with Gypsy and Traveller communities', 30) is most important. The disparity between 'explore' and 'engage' in bullets is disconcerting and needs clarification.

Priority 4 ('Promoting community cohesion', 31) moves to the realm of action rather than aspiration. It is unclear that lumps of 10 pitches randomly distributed in new developments achieve any of the bullets, and this appears to discriminate against travelling communities in creating inappropriate sizes of settlements.

Priority 6A ('Improving access to, and experience of, service ...A. Improved analysis of service takeup and planning', 32) This reads as though the intention is to put pressure on Gypsies and Travellers to tick boxes whenever help is provided. This is likely to reduce the willingness of people to seek such assistance, and a clear strategy to avoid such unwanted consequences needs developing. We do not see that the current GTDPD consultation has to do with 'Improving access to, and experience of, services'.

In sum Girton Parish Council feels that this draft needs both bolder thinking behind it and far closer attention to details before it can properly be consulted on as a potential strategy for the District.