

Friday, 28 July 17

**Tendring District Local Plan 2013 – 2033 and Beyond. Publication Draft.**

**Consultation Response Form**

Agent Details: Dr. Simon Ruston  
Ruston Planning Ltd  
10-12 Picton Street  
Montpelier  
Bristol  
BS6 5QA

Please specify which section of the Publication Draft Local Plan your comments relate to by choosing one of the following: Section 2 Tendring

Which part of the section are you responding to? Policy LP9

Do you consider the Local Plan is Legally compliant? No

Does it comply with the Duty to Co-operate? No

Do you consider the Local Plan is Sound? No

If you do not consider the Local Plan is sound, please specify on what grounds:  
Justified, Effective, Consistent with National Policy

Enter your full representation here: See attached Response

Please specify the changes needed to be made to make the Plan sound / legally compliant: See attached response

Do you wish to participate at the oral part of the examination? Yes

If yes you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: See attached response.

Did you raise the matter that is the subject of your representation with the LPA earlier in the process of the preparation of the Local Plan? No

Do you wish to be notified? At all listed points.

Please find attached the following 5 no. documents which form our response to the Tending Local Plan Consultation:

Consultation response cover letter (this document)

Consultation Response – Submission by Ruston Planning Ltd

Guildford Proposed Submission Local Plan - extract

South Cambridgeshire EiP - Inspectors letter to council re GTAA

Hull Local Plan Proposed Main Modifications - extract

Friday, 28 July 17

## **Tendring District Local Plan 2013 – 2033 and Beyond. Publication Draft.**

### **Consultation Response**

#### **Submission by Ruston Planning Ltd**

1. Ruston Planning Limited specialises in Gypsy, Traveller and Showpeople planning. We are instructed by Mr T Buckley, who currently has a planning application submitted (17/00507/FUL Land to The South of Gutteridge Hall Lane Weeley Essex). As such, he wish to see that the elements of the Local Plan that are applicable to him are sound and based on a robust evidence base.
2. In this submission we set out two main arguments. First, we assess policy LP9: Traveller Sites, concluding that in our view certain elements of the policy are not consistent with national policy. Second, we evaluate the evidence upon which this policy is based: Tendring Gypsy and Traveller Accommodation Assessment, Need Summary Report, May 2017 (the GTAA), arguing that the GTAA is not sufficiently robust, and that therefore the level of need in the area has not been adequately assessed. It follows, therefore that policy LP 9 is not based on robust evidence.

#### **Policy LP 9: Traveller Sites**

3. Policy LP.9 correctly provides criteria against which applications for Traveller sites should be assessed. However, in our view much of the policy is overly restrictive, and therefore unreasonable and inconsistent with Planning Policy for Traveller Sites (PPTS).
4. Below we have reproduced the criteria outlined in policy LP 9 (in italics), and annotated with regards to its consistency with national policy:

*In terms of un-met need when considering any proposals for additional traveller sites or pitches, the Council will consult the latest evidence of need contained in the most recent Gypsy and Traveller Accommodation Assessment and will only approve planning permission for proposals that*

*can demonstrate, with evidence, a genuine need for the proposed level of provision.*

In our view this requirement is not consistent with National Policy. PPTS is clear that all applications should be assessed against criteria-based policy, regardless of whether there is any identified need. Para. 11 of PPTS states that:

*“11. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.”*

*The Council will consider proposals against criteria a) to h) below alongside other requirements in the Local Plan:*

*a. sites must avoid any adverse impacts on any internationally, nationally or locally designated protected areas and must avoid areas prone to flooding;*

We consider this criterion to be consistent with PPTS / NPPF.

*b. sites must have reasonable access to key facilities (normally 1.5miles/2.4km on foot or 15 miles/24km by public transport to primary schools, doctors’ surgeries and convenience shops, 2 miles/3.2km on foot or 20 miles/32km by public transport to secondary schools and major employment);*

In our view, this policy criterion is overly prescriptive. It is useful to note that there are no specific distances to services cited in PPTS. And further, there is no mention of the need to reduce reliance on private car use. In addition, Para. 29 of the NPPF acknowledges that *“opportunities to maximise sustainable transport solutions will vary from urban to rural areas”*.

*c. sites should, where possible, utilise previously developed land and recognise the scale of nearby communities;*

We consider this criterion to be consistent with PPTS.

*d. sites must not exceed ten pitches in size and must make a minimum allowance of 250 square metres per pitch including circulation and*

*amenity space and a maximum of 350 square metres. Sites should normally be 3 miles/4.8km apart with scope for smaller sites to be closer than this;*

In our view this policy is overly restrictive, and further the size stipulations are both unrealistic, unnecessary, and discriminatory.

A maximum size of 350 square meters is unreasonably small. There is no reference at all in PPTS to a maximum / minimum size of a pitch. It is also worth noting that, although no longer extant the CLG designing Gypsy and traveller Sites: Good practice guide (2008) also makes no reference to ideal size, instead recognising that requirements will be different for different Gypsies / Travellers.

Further, in our view restricting the location of sites by stipulating a minimum distance between them is not consistent with national policy, the correct approach being to ensure that proposals will not dominate the nearest settled community as set out in para. 25 of PPTS.

*e. sites must comprise flat well drained ground and achieve safe access for large vehicles from the local road network and access to utilities;*

We consider this criterion to be broadly consistent with PPTS. However, the stipulation that the site must be flat is, in our view, overly restrictive. It is perfectly feasible that, as with bricks and mortar housing, with the appropriate permission a sloping site can be levelled to provide an appropriate gradient for development.

*f. sites must be safe for children, achieve aesthetic compatibility with the surroundings with scope for visual and acoustic screening to protect the amenity of nearby residents; and not impact on high grade utilised agricultural land;*

It is unclear why acoustic screening would be necessary and we would suggest that this is not an appropriate requirement. Furthermore, we would suggest that the point on agricultural land should be made to better fit the requirements of the NPPF at para.112

*g. sites must be of a high quality design and landscaping, providing a good standard of residential amenity for their occupiers; and*

In our view this criterion is consistent with PPTS.

*h. sites must be linked to mains services.*

Again, in our view this requirement is too restrictive and not consistent with PPTS. It is not possible for all sites to be linked to mains services, particularly as many inevitably have rural or semi-rural settings. In our view this cannot be taken as indication that the site is not suitable as there are many acceptable alternatives available.

In support of this view, in an appeal decision letter for Traveller pitches at Gutteridge Hall Lane (ref: APP/P1560/A/13/2195901 & 2195904) the Inspector states at para. 58 that:

*58. Although one of the criteria for gypsy and traveller sites in Policy HG22 is that sites should be linked to mains services, this does not appear to be a realistic option at the appeal site. Such connections were evidently not regarded as necessary when permission was granted for the existing pitches, and I see no reason to take a different view now.*

Although the Inspector is referring to old policy, the statement remains relevant.

5. In conclusion, in our view much of the criteria in policy is overly onerous, too restrictive and inconsistent with national policy. As such we suggest that much of it should be revised.
6. As a final and crucial point, it is unclear how the needs of Gypsies and Travellers who do not fit the new planning definition are to be met. We would emphasize that ethnic Gypsies and Travellers have a legal right to culturally appropriate accommodation, regardless of their travelling patterns. As such an absence of clear policy on this matter may leave the Tendring Local Plan open to legal challenge. This point is discussed in more detail below.

#### **Tendring GTAA Need Summary Report (May 2017)**

7. The Tendring GTAA 2017 was compiled largely in response to the change in the planning definition of Gypsies and Travellers introduced with the 2015 amendments to PPTS.
8. It is important to emphasize at the outset that the change in definition is currently subject to legal challenge, and as such it is perhaps premature to base new policy on the current definition.
9. It is noted that DCLG GTAA guidance (the 2007 Guidance), published in October 2007, was revoked in July 2016. However, as it has not been replaced by an updated document it currently represents the only government guidance on

carrying out GTAA's and as such it has been referred to below. In our view many of the issues that the guidance comments on remain unchanged by the 2015 amendments to Planning Policy for Traveller Sites (PPTS).

### ***Survey pool/baseline population***

10. The 2017 GTAA achieved interviews with 4 Gypsy and Traveller households. Even if the baseline population is assumed to be as low as 15 (8 households with which no contact was possible and at least 1 additional household at Spring Stables where the study notes at para. 5.14 an (unquantified) degree of overcrowding), this represents only 26.7% of the identified population.
11. It is worth emphasising that the baseline population figure is likely to be much higher than the 15 identified households and as such the 4 households reached are likely to represent an even smaller percentage of the actual Gypsy and Traveller population in Tendring
12. In our view this represents an unacceptably low percentage of identified households, particularly as no allowance has been made in the need calculations for either households that have not been identified or identified households that have not been reached.
13. Furthermore, we would suggest that as the surveys took place between January and September 2016 and again in May 2017, the fact that no contact was possible with 9 households over this time frame is likely to be indicative of the fact that they were pursuing a 'nomadic lifestyle'.

### ***Bricks and Mortar***

14. The 2017 GTAA achieved no surveys with Gypsies and Travellers living in bricks and mortar and as such no allowance has been made for movement from bricks and mortar to sites. The GTTA states at para. 4.3 that:

*4.3 At the time of concluding this report no contacts had been identified to interview.*

15. The GTAA is clear that it does not extrapolate findings from bricks and mortar population, stating at para. 2.14 that:

*2.14 As a rule we do not extrapolate the findings from our fieldwork with bricks and mortar households up to the total estimated bricks and mortar population as a whole as in our experience this leads to a significant over-estimate of the*

*number of households wishing to move to a site or a yard. We work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity we will put in place. Thus we are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study.*

16. We would note that even if surveys had been achieved it would not be possible to extrapolate the findings as the study provides no estimate/calculation of the baseline bricks and mortar population, which in itself is a gross oversight.
17. Although we acknowledge the difficulties of accessing Gypsies and Travellers in bricks and mortar, we would suggest that achieving no interviews is not reason to make no allowance for movement from bricks and mortar to sites. This view is supported by the Inspector at recent appeal<sup>1</sup> who considered the findings of another ORS GTAA for Central Bedfordshire (the first to be completed after the change in definition), and who states at para. 36 of the decision letter that:

*'I agree with ORS that getting to gypsies in bricks and mortar seems to be very difficult but, rather like the caravan count, **because the interviews revealed nothing doesn't mean it is reasonable to assume there is no-one.**' (emphasis added)*

#### **Household formation rates**

18. It is noted that, as the GTAA acknowledges, it is difficult to make accurate assessments of future need. However, in our view, The GTAA's approach to household formation rates is imprecise and unclear and therefore unsound.
19. With regards to household formation rates, the 2007 guidance states at para. 93 that:

*'Information on the likely rate of household formation and assessments of future accommodation need should be based primarily on locally gathered evidence, rather than average national estimates which may not reflect the position in the survey area concerned. Local trends should be identifiable from the current demographic profile of the community obtained from the local survey, from agencies working directly with local Gypsy and Traveller communities and from figures previously given for the caravan count. Gypsy and Traveller community representatives on the steering group should also be able to advise. In the event that local data*

---

<sup>1</sup> APP/P0240/A/12/2179237

*does not provide a clear picture it should be noted that average national estimates range between 3-4%.'*

20. We would emphasise that the guidance suggests using multiple sources in identifying local trends, and further it states that if the local data does not provide a clear picture average national estimates range between 3-4%. We would suggest that if only a few surveys have been completed, it is unlikely that local data will provide a 'clear picture'

21. The growth rates used in the Tendring study are unclear. The GTAA states, at para 5.12. that:

*5.12 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.*

22. First we would invite ORS to clarify what this 'judgement' entails.

23. Second we would question the accuracy and consistency of assuming that only 50% of newly formed households will remain in the area. If 50% of newly formed households are discounted from the study, where are they counted?

24. In our view, this approach is no different from applying a figure for net out-migration. With regards to in/out migration, in the 'technical report' at the end of the study it states that:

*23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but **in each case the in-migration to one area is matched by an out-migration from another area**. Since it is difficult to estimate the net effect of such movements over local plan periods, **ORS normally assumes that there will be nil net migration to/from an area.***

*Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects. [our emphasis]*

25. In our view this seems to be inconsistent with assuming that only 50% of newly formed households will remain in an area.
26. With regards to actual household formation in Tendring, the GTAA is unclear and imprecise, going on to state at para. 5.14 that:

*5.14 The outcomes in Tendring are that new household formation for Gypsies and Travellers who meet the planning definition has used the site demographics as there were only 2 children identified; site demographics have also been used for Gypsy and Traveller households that do not meet the planning definition as there were only 5 children identified; and the national rate of 1.50% has been used for unknown households.*

27. Whilst we invite ORS to clarify what household growth calculations have actually been used for those who do and do not meet the planning definition, what does seem clear is that according to the demographic results of the survey different growth rates are used throughout the study.
28. In our view relying on local demographic data to calculate growth rates when only a small number of surveys have been conducted is unlikely to yield accurate results.
29. In the appeal referred to above<sup>4</sup> the Inspector directly addresses the issue of using differential growth rates (para.37):

*... What is surprising is that they applied different rates to different groups of gypsies. Whatever a family's relationship to the terminology of PPfTS they are still gypsies in habit and culture and so are likely to exhibit the same household formation tendencies as each other and there would seem to be no reason to ascribe different formation rates.*

30. Further, in a 'Review of Gypsy Traveller Accommodation Assessment Evidence' compiled for Maldon District Council by the University of Salford, Dr Phillip Brown draws attention to the fact that the 1.5% household formation rate which ORS often utilises<sup>5</sup> draws heavily from birth rates from Hungarian Roma

---

<sup>4</sup> APP/P0240/A/12/2179237

<sup>5</sup> As it does in the 2017 GTAA in relation to 'unknown' households for whom no demographic data is available.

population statistics and questions the applicability of this data to UK Gypsies and Travellers. Further the report concludes that:

*planning only for the 1.5% pa figure may not provide for possible understatement resulting from shortcomings in accessing households in bricks and mortar and concealed households.*

31. The issue of providing for concealed households and understatement of need is particularly pertinent for the Gypsy Traveller community which is widely acknowledged can be a 'hard-to-reach' group.

32. Whilst we note that the 2017 GTAA asserts at para.5.1 that:

*[...] the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.*

33. The appeal decision referred to above demonstrates that this is clearly not always the case.

### **Overcrowding**

34. In our view the GTAA's approach to overcrowding demonstrates that the need calculations are not robust. The study states at para. 5.14 that:

*5.14 Whilst it was not possible to formally interview households living at the Spring Stables site **it was noted that there was a degree of overcrowding** on one of the pitches. However the site has **recently been granted planning permission** for 5 additional pitches and these will address any current over-crowding. [our emphasis]*

35. First, it is unclear the extent of the overcrowding noted.

36. Second, it is unclear why this overcrowding has not been included in any of the need calculations. Notwithstanding the potential availability of the 5 additional pitches, any doubled up pitches should, in our view, be included in need calculations, as even if there is not an immediate need, the additional household will inevitably effect future growth projections.

### ***Extrapolating findings***

37. In the past it has been standard for an assessment to contain a certain degree of extrapolation / proportional approach / scaling up. It is unlikely that any survey will reach every household that it relates to, but it should provide a sufficient evidence base from which to extrapolate results in order to account for households that were not surveyed<sup>6</sup>.

38. ORS have previously adopted a more cautionary and, in our view, more reasonable, strategy in order to allow for concealed households. When justifying the use of a 2.5% Household formation rate in the Gloucestershire 2013 GTAA, ORS state at para. 8.34:

*Therefore, an annual growth rate of 2.5% has been used in this assessment. Given that the evidence for population is as low as 1.25% per annum, we consider that this relatively high rate will provide enough pitches to accommodate all newly forming households in Gloucestershire and will also allow for concealed households and those living in bricks and mortar who may not have been identified in the survey.*

39. It is unclear why this was no longer thought to be appropriate.

### ***Dividing the GT Population according to the PPTS definition***

40. It is acknowledged that current policy advises that the needs of Travelling and non-Travelling households should now be assessed separately. However, we would suggest that in order to meet the requirements of both Article 8 of the Human Rights Act 1998 and the Public Sector Equality Duty, the needs of all Gypsies and Travellers including those who are identified as 'unknown' or non PPTS should be met through the same policy, as other LPAs are proposing to do (see attached examples from Guildford and Hull).

41. It is informative that the 2007 guidance observes at paras. 18 & 19 that:

*'18. Gypsies and Travellers will typically form only a very small percentage of the population in any given area. The total population is estimated to be about 0.6% of the total UK population, of which only a proportion are living in, or seeking, caravan site accommodation. This means that the*

---

<sup>6</sup> see for example: Supporting an Assessment of the Accommodation Needs of Gypsies and Travellers in Cornwall (2015), or the Solihull GTAA (2012) both of which were used as part of the evidence base for the respective Local Plans and found to be sound

***Strategic Housing Market Assessment is unlikely to yield results that are statistically robust for Gypsies and Travellers as a separate group.***

*19. Cultural differences, a reluctance of some members of these communities to identify themselves as Gypsies or Travellers, or a disinclination to participate in a process with which they are not familiar, mean that the main Strategic Housing Market Assessment process is likely to be markedly less successful in accessing this group than others. In addition, the particular lifestyle and culture of Gypsies and Travellers may give rise to distinctive accommodation needs, which the main assessment will be unlikely to pick up.’ (emphasis added)*

42. These statements remain pertinent. The change in definition has not altered the significance of cultural differences or the fact that including a very small minority group within the wider SHMA is unlikely to achieve robust results. Indeed, dividing the Gypsy / Traveller population between the GTAA's and the SHMA will only reinforce the significance of the statement as it means that the population included within the SHMA is even smaller.
43. Perhaps more importantly, if the SHMA is to account for Gypsies and Travellers that do not fulfil the definition, and they are not treated as Gypsies and Travellers for planning purposes, their right to a traditional lifestyle is likely to be compromised.
44. This is a point that was addressed by the Inspector in the Cambridge / South Cambridgeshire EiP in a letter dated 30<sup>th</sup> March 2017 (attached):

*Given the above and the very large number of “unknown” households identified in the GTAA, I am concerned that planning for the very small numbers identified as currently coming within the new definition without identifying provision for those persons who fall outside the PPTS definition who have a need to reside in caravans may not represent a sound approach in South Cambridgeshire. **There would also be Human Rights and Public Sector Equality Duty implications in adopting a plan which fails to meet the needs of those persons who no longer fall within the PPTS definition but who are in need of a caravan site, in particular those persons who are also Romany Gypsies, Irish Travellers, elderly and disabled** [emphasis added].*

45. Although the numbers involved in Tendring may be significantly lower than in South Cambridgeshire, the point remains relevant. The Tendring Local Plan policy

is unclear in how it intends to meet the needs of Gypsies and Travellers who do not fit the PPTS 2015 definition, or indeed those whose status is unknown.

46. Notwithstanding that the division of the Gypsy and Traveller population between those who do and do not travel is in itself discriminatory and, in our view, unlawful, we would suggest that the method used by ORS to distinguish between Travellers who do and do not fit the new PPTS definition, is flawed in itself and may in fact exclude Travellers who do still travel. The key point here is the way in which they have applied the relevant case law on the definition. Para. 1.10 cites the well known authority of Dunn:

*1.10 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.*

47. We would agree that this is an accurate description of the case law. It is useful now to consider how this has been applied to the definition.

48. Para 1.15 concludes that those Gypsies and Travellers who have stated that they travel to visit horse fairs do not fit the new definition:

*1.15 The implication of these rulings in terms of applying the planning definition is that it will only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence.*

49. Para. 5.3 of the assessment is indicative of the problematic nature of the application of this approach. When discussing the findings in Tendring, it is stated that:

*Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.*

50. In our view had Mr Dunn been asked the main reason for his travelling he would have most likely have stated “horse fairs” and the ORS approach would have excluded him from being within the definition:

51. In effect, the approach taken to the definition on this point has nothing to do with the August 2015 amendments to PPTS, and it would seem highly probable that this has had the effect of excluding a number of Gypsies and Travellers from the definition. Such an approach is in our view unlawful, and would leave the Local Plan open to legal challenge unless remedied.

### **Lack of Clarity**

52. As a final point, we would suggest that the advice given at para. 5.19 of the GTAA, and reproduced in policy LP9, is unclear. We therefore invite ORS / the LPA to clarify what is meant by the following:

*5.19 It is understood that that one of the undetermined sites that is seeking planning permission for 5 additional pitches to the south of Woodfield Bungalow is owned by the family of the households that do not meet the planning definition. If planning permission is granted these pitches may be used to meet need for 3 additional pitches arising from households living on existing pitches adjacent to Woodfield Bungalow.*

### **Conclusions**

53. In our view, it is erroneous that only those Gypsy’s and Travellers who have completed a survey and have demonstrated that they meet the 2015 definition should be included in need calculations, particularly when such a small survey sample has been achieved.

54. The difficulties of accessing the community are well documented and it is simply unrealistic to expect to be able to survey 100% of the Gypsy / Traveller population. As such it seems somewhat unrealistic and unhelpful to only include in need calculations those Travellers who have ‘demonstrated that they fulfil the new definition’.

55. It simply does not represent ‘good planning’ to work with the most minimum of figures as the update appears to suggest. Not only is there is no basis for such an approach in policy or guidance, it is likely to lead to a greater disparity between provision and need in the future, thereby accentuating the inequalities the Gypsy Traveller community face.

56. In our view, including only Gypsies and Travellers who demonstrate they still Travel in need calculations is discriminatory and unlawful.

57. Furthermore as detailed above the GTAA is at points unclear and inaccurate.

58. For the reasons given above, in our view the GTAA update is not a sufficiently robust assessment of need and as a result the actual level of unmet need has been significantly underestimated. It follows that the related policy has not been based on sound evidence.

Dr Simon Ruston MRTPI

*Ruston Planning Limited*

## **POLICY S2: Borough Wide Strategy Planning for the borough - our spatial development strategy**

- (1) During the plan period (201~~53-343~~), we will make provision for at least 12,426 new homes, ~~37,200~~36,100 – ~~47,200~~43,700 sq m of office and research and development (B1a and b) floorspace, ~~and 4.73.7~~ – ~~5.34.1~~ hectares of industrial (B1c, B2 and B8) ~~employment land and 41,000 sq m of comparison retail floorspace.~~ to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.
- (2) The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.
- (3) We will identify ~~4~~43 permanent pitches for Gypsies and Travellers and ~~4~~6 permanent plots for Travelling Show-people (as defined by Planning Policy for Traveller Sites) within Guildford borough between 201~~72~~ and 20~~34~~17. ~~Between 2017 and 2027 an additional 30 pitches and 2 plots will be permitted or any new target as identified within an updated Traveller Accommodation Assessment.~~ Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs we will seek to provide 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. We will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning status.

### **Annual Housing Target**

<b>Year</b>	<b>Housing number</b>	<b>Year</b>	<b>Housing number</b>
<b>2018/2019</b>	<b>500</b>	<b>2026/2027</b>	<b>700</b>
<b>2019/2020</b>	<b>550</b>	<b>2027/2028</b>	<b>700</b>
<b>2020/2021</b>	<b>600</b>	<b>2028/2029</b>	<b>785</b>
<b>2021/2022</b>	<b>600</b>	<b>2029/2030</b>	<b>790</b>
<b>2022/2023</b>	<b>700</b>	<b>2030/2031</b>	<b>790</b>
<b>2023/2024</b>	<b>700</b>	<b>2031/2032</b>	<b>790</b>
<b>2024/2025</b>	<b>700</b>	<b>2032/2033</b>	<b>790</b>
<b>2025/2026</b>	<b>700</b>		

<b>Year</b>	<b>Housing number</b>	<b>Year</b>	<b>Housing number</b>
<b>2019/2020</b>	<b>450</b>	<b>2027/2028</b>	<b>700</b>
<b>2020/2021</b>	<b>450</b>	<b>2028/2029</b>	<b>700</b>
<b>2021/2022</b>	<b>500</b>	<b>2029/2030</b>	<b>800</b>
<b>2022/2023</b>	<b>500</b>	<b>2030/2031</b>	<b>810</b>
<b>2023/2024</b>	<b>500</b>	<b>2031/2032</b>	<b>850</b>
<b>2024/2025</b>	<b>550</b>	<b>2032/2033</b>	<b>850</b>
<b>2025/2026</b>	<b>600</b>	<b>2033/2034</b>	<b>850</b>
<b>2026/2027</b>	<b>700</b>		

4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.

## 4.2 Housing Policies

### Policy H1: Homes for all

#### Introduction

- 4.2.1 We want to deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs and demands of different people in our community. This includes housing for families, older people, people with disabilities, travellers and students. New housing developments must take account of local need to give a genuine choice and mix of housing and help create balanced, sustainable and inclusive communities.

### **POLICY H1: Homes for all**

#### **Housing Mix**

- (1) New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location.
- (2) Development that results in the net loss of ~~all housing or specialist~~ housing, including sites allocated for housing within the Local Plan will not be permitted. Development that results in the net loss of C2 use class or C3 use class accommodation or traveller accommodation, including sites allocated for such use in the Local Plan, will not be permitted.

#### **Density**

~~New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependant upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.~~

#### **Accessible homes**

- (3) On residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard 'accessible and adaptable dwellings' and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.

#### **Specialist accommodation housing**

- (4) ~~We will support t~~he provision of well designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account local housing needs.

#### **Student accommodations**

- (5) Purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate. We expect About 60 per cent of full time Guildford based the University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces

and accommodation on campus.

### **Gypsy, Traveller and Travelling Showpeople pitches and plots**

- (6) ~~We will identify sufficient sites~~ are allocated within the Local Plan to meet the for Travellers' accommodation needs of Gypsies, Travellers or Travelling Showpeople (as defined by Planning Policy for Traveller Sites) as set out in the latest Traveller Accommodation Assessment as well as to cater for the potential additional needs of households of unknown planning status. These sites ~~are will be~~ for a mix of tenures and provided on a number of small sites and as part of larger development sites to help create sustainable and mixed communities. Sites are also allocated within the Local Plan to contribute to meeting the assessed needs of Gypsies, Travellers and Travelling Showpeople who do not meet the Planning Policy for Traveller Sites definition. New sites must have adequate utility services and amenity space, space for related business activities where appropriate, safe vehicular access, turning space and parking and be in areas with reasonable access to schools health services and local services. Sites should not significantly impact on the visual amenity and local character of the area or adversely affect an environmentally sensitive location.
- (7) Accommodation for Gypsy, Traveller or Travelling Showpeople (whether they meet the Planning Policy for Traveller Sites definition or not) accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need. For 500 to 999 homes two pitches or plots should be provided, for 1,000 to 1,499 homes four pitches or plots, for 1,500 to 1,999 homes six pitches or plots and for 2,000 or more homes eight pitches or plots.

### **Houses in multiple occupation**

- (8) Proposals for houses in multiple occupation that require planning permission will be supported ~~only~~ where the balance of housing types and character of the immediate locality would not be adversely affected and there is sufficient amenity space available.

### **Self-build and custom housebuilding**

- (9) Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites.
- (10) Self-build plots made available must respond to the sizes identified on the register. Plots must be made available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.

## **Definitions**

4.2.1a Evidence of active and comprehensive marketing is defined in appendix A2.

### **Reasoned justification**

4.2.2 We have assessed the types, sizes and tenures of homes required to meet the needs of our community through the Strategic Housing Market Assessment (SHMA). This includes accommodation needs of families, older people, people with disabilities, service families, people wishing to build their own home and students. The Traveller

Accommodation Assessment (TAA) has assessed the need for traveller accommodation. We will have regard to the findings of the latest SHMA when determining the right balance of homes in new development and would encourage applicants to discuss housing mix with the Council's Planning and Housing Officers.

4.2.3 From the SHMA 2015 and Addendum Report 2017 we know that in our borough:

- there is a need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes
- there is a need for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes.
- we have an ageing population with a significant projected growth in the over 65 year olds
- there is a projected increase in people with long term health problems or disability
- there is an estimated need for 433242 registered care bedspaces over the plan period
- there is an estimated need for 1,061334 specialist homes-accommodation for older people over the plan period
- households headed by someone aged under 35 are projected to increase
- there are approximately 15,635 households with dependent children
- there are approximately 4,689 households containing non-dependent children.

4.2.4 ~~We want a~~ flexible housing stock ~~will that~~ helps meet the wide range of accommodation needs so we will expect all new homes to be flexible, accessible, adaptable and age friendly. New homes should support the changing needs of individuals and families at different stages of life. The requirement for 15% of all new residential development to meet Building Regulations M4 (2) category 2 accessible and adaptable dwellings including a percentage of M4 (3)(b) category 3 standard wheelchair user dwellings will help to address the accommodation needs of people with disabilities and older people.

4.2.5 We wish to see an appropriate mix of homes provided across the borough, including the villages. Whilst all new development must be in keeping with the character of the surrounding area this does not preclude the delivery of smaller units as these are capable of being designed in such a way that respects the prevailing built form.

4.2.6 In most cases the accommodation needs of different groups will be met as part of the general housing supply within the overall assessed housing need (use class C3 dwelling houses) through a mixture of different tenure, size and designed homes. ~~The~~ eExceptions to this include is residential care or nursing homes, student halls of residence and traveller accommodation.

4.2.7 For the purpose of monitoring the contribution of new homes towards our identified local housing requirement, we will include use class C3 dwellings<sup>1</sup> and certain uses that do not have a specific use class (known as sui generis uses<sup>2</sup>) such as large houses in multiple occupation or self-contained accommodation for the elderly. We have different targets for traveller accommodation that we will monitor separately. Purpose built student accommodation on campus and use class C2 residential institutions for older people are considered separately from general housing needs in this plan. Any additional student accommodation or residential institutions built over and above projected need (as identified in the SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market.

---

<sup>1</sup> Self-build and custom built houses are classed as C3 use class dwellings.

<sup>2</sup> The Use Classes Order 1987 (as amended)

~~4.2.19 For the purpose of this policy the term ‘eligible students’ applies to students requiring accommodation in the locality and excludes those students not requiring student accommodation such as those on distance learning courses, year out placements, part-time students and those living in their own or family home.~~

**Gypsy, Traveller and Travelling Showpeople pitches and plots**

4.2.20 National planning policy for Gypsy, Traveller and Travelling Showpeople is set out in the National Planning Policy Framework and Planning Policy for Traveller Sites and we will expect all new sites to meet the requirements of national this policy. New pitches and plots should have adequate utility services and amenity space, safe turning space and parking and be in areas with reasonable access to schools, health services and local services. Travelling showpeople sites may also need space for related business storage.

4.2.21 The Guildford borough Traveller Accommodation Assessment (TAA) 2017 found that there was an accommodation need for Gypsies, Travellers and Travelling Showpeople for a mix of tenures for both public and private sites. ~~We support s~~Small-scale ~~t~~Traveller sites ~~(up to nine pitches or plots) are supported~~ as we believe these will better integrate with the locality. Where larger sites exist, we will support reconfiguration and improvements to the overall living conditions.

4.2.22 ~~We have identified s~~Sufficient sites are identified within the Local Plan borough to meet the accommodation needs for 4 permanent pitches for Gypsies and Travellers, 43 permanent pitches for Gypsies and Travellers and 6 permanent and 4 plots for Travelling Showpeople up to 2034/17. Between 2017 and 2027 there is a need for an additional 30 pitches and 2 plots or any new target as identified within an updated Traveller Accommodation Assessment. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs we will seek to provide 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. We will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning traveller status.

4.2.23 Our TAA found no evidence of need for a transit site within our borough. However, we will continue to work with neighbouring authorities to address the issue of transit sites if necessary.

4.2.24 ~~We require t~~Sites allocated for ‘Gypsy and Traveller pitches (sui generis)’ shall be considered for use by “Gypsies and Travellers” as defined by Planning Policy for Traveller Sites and/or for those who do not meet that definition, according to their needs as identified in the council’s Traveller Accommodation Assessment (and any updates) and in accordance with Planning Policy for Traveller Sites (or any updates which may be issued in the future). Gypsy, Traveller and Travelling Showpeople accommodation is required within development sites of 500 homes or more to help create sustainable, mixed communities with suitable accommodation housing for all. The loss of pitches or plots will be strongly resisted.

**Houses in multiple occupation**

4.2.25 Houses in multiple occupation (HMOs) are dwellings lived in by more than one family or groups of individuals who share facilities such as a kitchen or bathroom. They provide a valuable source of accommodation to meet the needs of some of our local population.

## Policy H3: Rural exception homes

### Introduction

- 4.2.45 In many rural Green Belt areas of ~~Guildford the~~ borough high house prices and a limited supply of new affordable homes restrict the potential for resident and newly ~~---~~forming households and those working in the parish to live in a home of their own that they can afford. People who cannot afford to access market housing that meets their needs, either to rent or to buy, need affordable homes. People in this situation who have connections to rural parishes through family, recent past residence, or current employment may be eligible for ~~R~~rural exception housing.
- 4.2.46 As an exception to other development plan policies including Green Belt policy, we will support the provision of rural exception housing. This is affordable housing provided on small sites in rural areas on Green Belt land, as an exception to other planning policies. Such housing must be retained permanently for people who are current or former residents, or who have a family or employment connection to the parish.

### **POLICY H3: Rural exception homes**

- (1) Small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:
- (a) the site adjoins or is closely related to, and in safe and easy-reasonable walking distance of a defined or a non-defined rural settlement, and
  - (b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified ~~local~~ affordable housing needs of the local community, and
  - (c) the affordable homes are all secured ~~as affordable homes~~ in perpetuity.

### Reasoned Justification

- 4.2.47 There are fewer opportunities to build new homes in our small rural settlements surrounded by, or designated as Green Belt than there are in and around the towns of Guildford, and Ash and Tongham due to more restrictive policies on housing in countryside and particularly in the Green Belt. Reflecting this reduced opportunity, legislation enables us to secure affordable housing in perpetuity in and around most of the villages in the borough. In the villages and parishes listed in the legislation we can secure rural exception housing in perpetuity, secured by planning obligation. In the parishes of East Horsley and Send, rural exception housing may be delivered providing the protection is in place to secure these permanently as affordable housing<sup>1</sup>.

---

<sup>1</sup> This is because they are not designated as “rural areas” by the Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997. East Horsley and Send therefore are not exempt from the right to acquire or right to enfranchise, and so affordable housing cannot automatically be secured in perpetuity. In order for a rural exception scheme to be granted planning approval in East Horsley or Send, the housing provider will have to demonstrate that mechanisms are in place to ensure that the properties remain as affordable housing in perpetuity, for example being held in a Community Land Trust and let on terms which would not allow the freehold to be acquired by the resident and/or sold on the open market.

- 4.2.48 In determining whether a site is suitably small scale, consideration will be given to identified local affordable housing needs and to previous applications for rural exception housing.
- 4.2.49 We will work with parish councils, the Surrey Rural Housing Enabler and landowners to understand the affordable housing needs of people with a local connection to specific rural areas. In applying this policy, consideration will be given to the needs of the local community by accommodating households who have a current employment or family connection, or are current or recent former residents of the Parish. ~~This includes a cascade approach to the allocation of rural exception housing.~~ We will also facilitate provision of rural exception sites for local agricultural workers, and for local traveller needs where such a need is demonstrated. Traveller exception housing will be provided on council-owned public pitches on small, suitably located sites in the Green Belt.
- 4.2.50 Local Rural Housing Needs Surveys are generally carried out by the Surrey Rural Housing Enabler, working with the Council and Parish Councils. We have a rolling programme of surveys for the borough's Parishes. Over half of the parishes in the borough already have local housing needs surveys, although such surveys must be up-to-date if they are to be used in support of a planning application for rural exception housing. Developers may also carry out their own surveys, provided these are verified by the Council and the Rural Housing Enabler. The need for affordable pitches for Travellers' accommodation is reported in Guildford's Traveller Accommodation Assessment 2013.
- 4.2.51 Rural exception housing will be delivered by Registered Providers, and by private developers.
- 4.2.52 There may be situations where a developer demonstrates that a rural exception scheme would be unviable ~~without public subsidy~~. In such situations, and where there are no alternative sites available to provide the identified local affordable housing needs (as required by national policy) we may consider permitting the minimum number of market homes to make the scheme viable. We may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels. The inclusion of market housing must serve to benefit the rural affordable housing stock and not inflate the "threshold land value". This is the minimum land value likely to trigger an owner to sell the land.
- 4.2.53 Land values are generally high across the borough. To ensure that developers take into account the policy requirements of land potentially suitable for rural exception housing, where a developer proposes that at least one market house needs to be included to make the rural exception scheme viable, we will require submission of a development appraisal. In considering this, we will limit the threshold land value of the site to no more than ten times the agricultural land value at the time. Where agreement cannot be reached, external consultants will be appointed at the developer's cost to provide an independent assessment of the scheme's viability. Any market housing must improve the mix of market housing in the village, and must be integrated into the rural exception development.
- ~~4.2.54 To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).~~

# LOCAL PLAN EXAMINATIONS

## CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

INSPECTOR: Laura Graham BSc MA MRTPI  
ASSISTANT INSPECTOR: Alan Wood MSc FRICS  
PROGRAMME OFFICER: Gloria Alexander  
Tel: 07803 202578

email: [programme.officer@cambridge.gov.uk](mailto:programme.officer@cambridge.gov.uk) / [programme.officer@scambs.gov.uk](mailto:programme.officer@scambs.gov.uk)

30 March 2017

Mrs C Hunt  
Planning Policy Manager  
South Cambridgeshire District Council

Copy to:  
Joanna Gilbert-Wooldridge  
Acting Planning Policy Manager  
Cambridge City Council

Dear Mrs Hunt

### **South Cambridgeshire District Local Plan Examination Gypsy and Traveller Accommodation Assessment**

The following has been provided by the Inspectors for the Council:

I have now had an opportunity to study the new GTAA (RD/Strat/221) and the Further Proposed modifications (RD/FM/010). There are some initial questions that I wish to raise with the Councils.

Whilst the GTAA sought to engage with the local gypsy and traveller population there is nothing before me to indicate that this new evidence and the further modifications based upon it have been subject to any form of consultation. I am aware that I have advised that there should be only one further round of formal consultation on main modifications, this does not preclude less formal consultation and engagement with key stakeholders, when significant new evidence is prepared. Given the very substantial changes that the Council is proposing to Policy H/19, I am concerned that parties with a legitimate interest have not been consulted at all, and this may lead to an extended examination. As you may be aware, I have received correspondence from Mr Michael Hargreaves, who made representations to this policy at publication stage, relating to the GTAA, to which I have replied, in so far as it raises procedural issues. I suggested that he should approach you with a view to preparing a statement of common/uncommon ground in relation to the GTAA, but I do not know whether he has approached you or whether any progress has been made.

Nonetheless, there are certain concerns that I have identified which I would like you to address as follows:

Following the enactment of section 124 of the *Housing and Planning Act 2016* the assessment of the needs of travellers must be seen in the wider context of the provision of sites on which caravans can be stationed. Section 124 of this Act amends section 8 of the *Housing Act 1985* and requires each local housing authority in England to consider the needs of people residing in or resorting to their district with respect to the provision of:

- (a) sites on which caravans can be stationed, or
- (b) places on inland waterways where houseboats can be moored.

The section also removed section 225 of the Housing Act 2004 which referred to local authorities carrying out a review under section 8 of the Housing Act 1985 specifically assessing the accommodation needs of gypsies

and travellers in their area. DCLG has published the *Draft guidance to local housing authorities on the periodical review of housing needs - Caravans and Houseboats* (11 March 2016).

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/507289/clause\\_115\\_draft\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/507289/clause_115_draft_guidance.pdf) The 2007 Guidance on GTAA's has been withdrawn.

In the above context, will your assessment of the needs for traveller sites be a sub-set of the needs assessment for caravan sites generally and form part of the overall assessment of housing needs in a SHMA?

Further Proposed Modifications (p49 of RD/FM/010) states that with respect to travellers who do not meet the new definition the Council *will assess and plan to meet their needs as part of its wider responsibilities to plan to meet the accommodation needs of the settled communities.*

What steps is the Council taking to address this matter? How does it envisage this need being met? Is further evidence or Further Suggested Modifications likely to be submitted on this matter?

The new GTAA (RD/Strat/221, Fig52) identifies 70 households not meeting the new definition and 170 unknowns of which it suggests only 10 might meet the definition. Assuming for the moment that the GTAA is correct in its assumptions, it identifies a substantial base population of caravan-dwelling households (up to 240) which is likely to give rise to additional needs in the future for additional pitches for caravan dwellers.

The GTAA (eg paragraph 3.20) highlights, among other matters, that some of those who fall outside the new definition may be able to demonstrate a right to culturally appropriate accommodation, which is likely to be caravans. More generally the Council is now required by the Housing Act as amended, to assess the need for provision of sites on which caravans can be sited.

Given the above and the very large number of "unknown" households identified in the GTAA, I am concerned that planning for the very small numbers identified as currently coming within the new definition without identifying provision for those persons who fall outside the PPTS definition who have a need to reside in caravans may not represent a sound approach in South Cambridgeshire. There would also be Human Rights and Public Sector Equality Duty implications in adopting a plan which fails to meet the needs of those persons who no longer fall within the PPTS definition but who are in need of a caravan site, in particular those persons who are also Romany Gypsies, Irish Travellers, elderly and disabled.

I would be grateful to receive a response from you indicating how you intend to address these soundness concerns together with an indication of the likely timescale for any further work.

I note that the number of gypsy and traveller households and/or caravan dwellers identified in Cambridge City in the GTAA is much smaller (2) and therefore unlikely to raise the same level of concern in relation to soundness. I am, however, copying this letter to the City Council, as the requirement to consider the needs of caravan dwellers applies to all local authorities and I am inviting them to provide me with a brief account of how they consider this has been met in the Local Plan.

Laura Graham  
Inspector

I look forward to your response in due course.

Kind regards

Gloria Alexander  
Programme Officer

Hull Local Plan: Proposed Main Modifications. Gypsy and Traveller Policy to include those who do not meet the new planning definition.

			<u>The recently completed Gypsy and Traveller Accommodation Needs Assessment (GATANA) (2017) has taken account of the revised national planning definition of Gypsies, Travellers and Travelling Showpeople, which now excludes those who have ceased travelling permanently (Planning Policy for Traveller Sites (PPTS), DCLG 2015). The GATANA indicated a need in Hull for 15 pitches over the 2016-32 period, with only 3 of these meeting the new PPTS definition. The analysis identified the need over different time bands within the 2016-32 plan period, for both Travellers who do, and those who do not, meet the new definition, as shown in Table 5.B.</u>
MM 5.36	Para 5.43	MIQ6	After para 5.43 add second new para:  <u>Regarding the 3 permanent pitches needed under the new PPTS definition, the study concluded that it would be unlikely to be viable for the Council to meet this need through provision of a new site (due to the small scale shown to be necessary). Instead, it recommended the Council investigate the possibility of expanding provision on existing sites. Only 1 new permanent pitch is required in the next 5 years (2016-21) and it is likely this can be accommodated within an existing site.</u>
MM 5.37	Para 5.43	MIQ6	After para 5.43 add third new para:  <u>Regarding the 12 pitches needed by non-PPTS Travellers, the study indicated that only around half of this need in fact is likely to be for pitches with half preferring "bricks and mortar" accommodation (i.e. a house). Therefore it is assumed that the demand will be for approximately 2 pitches in each of the periods 2016-21, 2021-26 and 2026-32, totalling 6 pitches over the plan period. There is potential for small-scale expansion of existing sites and the Council is currently investigating land adjacent to existing sites to accommodate the 2 non-PPTS pitches required in the next 5 years.</u>
MM 5.38	Para 5.43	MIQ6	After para 5.43 add fourth new para:  <u>The total need for pitches by both Travellers who meet the PPTS definition and those who do not is therefore 9 over the plan period, comprising 3 in each 5-year period. The Council will seek suitable sites either adjacent to existing sites or in Flood Risk zones 1 and 2 to accommodate the 6 pitches required in years 6-16 of the plan. As a significant landowner in the city, it is likely that these will be delivered on Council-owned sites.</u>

Key is MM 5.38 reproduced again below:

After para 5.43 add fourth new para:

The total need for pitches by both Travellers who meet the PPTS definition and those who do not is therefore 9 over the plan period, comprising 3 in each 5-year period. The Council will seek suitable sites either adjacent to existing sites or in Flood Risk zones 1 and 2 to accommodate the 6 pitches required in years 6-16 of the plan. As a significant landowner in the city, it is likely that these will be delivered on Council-owned sites.