

**Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document (DPD)**

**Inspectors' matters, issues and questions (MIQs)**

**Stage 1 – Core Strategy**

26 May 2017

*Note: The MIQs for Stage 2 relating primarily to the Settlement Proposals Development Plan Document and 5 year supply of housing will be made available separately. Some cross-cutting issues relating to both plans will be considered in Stage 1.*

*Abbreviations:*

*ADM – additional minor modification proposed by the Council*

*CS – Core Strategy*

*Framework – National Planning Policy Framework*

*Regulations – The Town and Country Planning (Local Planning) (England) Regulations 2012*

***The Council's answers are in italics with any suggested modifications in red italics***

**Matter 12: Gypsies, Travellers and Showpeople (Policy SP12)**

**Main issue: Is this policy consistent with national policy in respect of providing an on-going supply of land for this type of accommodation throughout the plan period? Is it otherwise effective in its aims?**

Questions

*SP12: Gypsies, Travellers & Showpeople*

1. The policy seeks to meet identified needs within the first 5 years of the plan period, but does not appear to look beyond this time horizon. Why? Has there been an assessment of the likely need for permanent and transit site accommodation for the full plan period to 2031? I.e. is the identified need in paragraph 1, page 56 (20 stopping/transit pitches, 13 permanent pitches and 2 plots for show and circus people) intended to cover the full plan period? (The GTAA 2016 identifies a future need of one pitch arising from existing authorised sites). If not, is the plan consistent with the NPPF which seeks to ensure that full objectively assessed needs are met over the plan period?

*The Council considers the evidence to be consistent with the NPPF. The Council has had two Gypsy and Traveller Accommodation Assessments carried out, one in 2012 (CD37) and one in 2016 (CD38).*

*With regard to permanent pitches, this is both for Gypsies, Travellers and Showpeople; the permanent need for pitches in the District varied by 6 pitches between the two studies, with East Lindsey having one of the lowest caravan counts in the country.*

*The study in 2012 (CD37) states on page 49 - "From years 6 – 10 (2019 – 2023) and 11 - 15 (2024 – 2028) there is not expected to be further need for additional permanent residential pitches for Gypsies and Travellers."*

*The study in 2016 (CD38) focused on the need within the first five years, though on page 32 at 5.16 it does state that the need is required within 5 years. The main difference between the two studies is the second study was able to access the Gypsies already living in the District for more information than the first study did, so the 2016 Study is more robust in this regard and it added on 3 permanent pitches derived from psychological aversion (something the first study had not taken into account).*

*This means that there is very little difference between the two studies with the numbers of permanent families living in the District actually not altering.*

*There is a clearer picture of the how the need is made up in the first five years with the future arising need after the first five years being nil at the present time.*

*The resident population of the District is so small that the Council and the Studies undertaken for the Council have to be very careful not to identify any of the members of the local population with too much detail. The Council does know who they are and from the work the consultants have done and personal contact by officers therefore knows what their needs are going into the future. The existing sites with permission have been assessed and they can accommodate an increase in pitch numbers. The Council is now working on trying to bring the allocated site in Louth for 11 pitches forward but this will involve purchasing the site, which the Council hopes to complete by the end of the year.*

*With regard to the transit site provision, both the 2012 and 2016 study determined that the need was for 20 transit pitches. Most of the unauthorized stopping occurs in the Coastal Zone. The Gypsy and Traveller Community come to the coast in the main to be on holiday, though they do also work when staying in and around the coast. It is not possible to predict if this is going to rise in the future and the 20 pitches are for the whole plan period. However, it is planned that a refresh of the GTAA will be undertaken during the 5 year review of the Local Plan, and this will confirm if any more provision is required.*

*The Council considers that the Plan does seek to ensure its full objectively assessed need with this regard. The Plan could be clearer about the need to review the position during the 5 year review. The Council would suggest a modification to make this clear with an additional sentence added onto the end of paragraph 13 of the policy which could read as follows;*

*To ensure that the evidence continues to be robust in regard to Gypsy and Traveller provision the Council will carry out by the time the review of the Local Plan is submitted for examination a further Gypsy and Traveller Accommodation Assessment and any further provision will be included in that review.*

2. If there has been no assessment of need beyond the first five years of the plan period, or if that assessment is not robust, is the policy consistent with national policy at paragraph 10 of the Planning Policy for Traveller Sites, August 2015?

*See answer to question 1. The Council believes the assessments carried out are robust.*

3. Should the policy make it clear that the relevant sites are allocated in the Settlements Proposals DPD?

*At paragraph 2 of the policy it does state that the Council aims to allocate sites in the Settlement Proposals Document and meet the need within the first five years of the life of the Local Plan. It also states that the GTAA did not identify a need beyond the first five years. This is not translated into the dark text of the policy which could be considered an oversight. The Council would suggest a modification to the plan at clause 1 so it reads;*

*The Council will allocate land in the Settlement Proposals Document to accommodate the following in the first five years of the Plan;*

*20 stopping/transit pitches  
10 permanent pitches*

4. The policy contemplates sites in, adjacent to or in "reasonable proximity" to towns and large villages but in medium villages, sites should be in or adjacent to the settlement. Why would sites in "reasonable proximity" to medium villages not potentially be suitable and what is the justification for omitting any reference to the potential for such development in small villages?

*The policy should read for medium villages "in reasonable proximity" this is an oversight, there is no reason why sites should be treated differently to towns and large villages. Therefore the Council propose a modification to paragraph 6 of the policy so that it reads*

*Medium villages have less services and villages than towns and large villges but some do offer a limited range of services. The Council will therefore support new sites in, adjacent to or in reasonable proximity to medium villages.....*

*And a modification to clause 2 so that it reads;*

*The Council will support new permanent Gypsy and Traveller sites and sites for Travelling Showpeople in, adjacent to, or in close proximity to medium villages.....*

With regard to small villages, these types of settlements are normally very small in the District with very few services or facilities if any and it was felt to be inappropriate and unsustainable to the occupiers of new sites to allow them to come forward in this type of settlement.

5. Does Clause 4 require amendment to clarify that extensions to existing sites in medium villages should not result in a site accommodating more than 3 pitches?

*The Council is unsure how the question relates to clause 4, it relates to paragraph 6 in the light text of the policy and clause 2 of the dark text of the policy. The Council believes that the text of the question above sets out the wording clearer than in the Local Plan and the Council would suggest rewording both parts of the policy so that they read*

*"but they should be small scale resulting in a site no more than 3 pitches or plots"*