

LOCAL PLAN EXAMINATIONS

CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

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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 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