

BDC response to Matter 8 - Meeting the Housing Needs of different groups in the community (BDC-32)

Question 8.4 – Policy ST32

a) The 2019 assessment (pg 56 – para 69) mentions an authorised site whose potential use was under review and if not brought back into use would increase need in first 5 years by 28. There was no further mention of this in the updates. Has it continued in use? If not has this been added to the need figures?

The figure of 28 pitches mentioned at para. 6.9 of the 2019 GTAA [SS-018] related to a site which was not in use at the time but regarded as 'potential' i.e. it could be brought back into use. However, there is no evidence that since the 2019 GTAA [SS-018] was undertaken that the site has been brought back into use or will be by the end of the first 5-year period of 2019-2024. As such, the site was not included in the supply figures of the 2022 GTAA Update [SS-027] (Table 7, p.6 for a list of new supply since 2019).

b) Clarification is required for where the figure of 21 (revised to 25 in MM) additional pitches by 2029 and a further 21 (revised to 24) by 2038 come from in para 7.20.3? Is it from the 2019 assessment which has a 2019 base or the 2022 update which has a 2022 base? Need to be using the same base date as the plan which is 2020.

The need for 10 additional pitches during the period 2019-2024 relates to the 'PPTS' definition accommodation needs as identified by the 2019 GTAA [SS-018] (Table S1, p.10). The figure of 21 pitches is based on calculations in the GTAA and an informed approach taken to delivery, deriving from discussions between BDC, our consultants and landowners. However, given that the GTAA accommodation needs figures are based on contemporary evidence it is not possible to retrospectively rebase the accommodation needs period i.e. to rebase 2022 to 2020.

c) In relation to para 7.20.4 – what is the identified need for the first 5 years (MM says 10 years)?

2019 Table S.1 (page 10) says 2019- 2029 = 30.

2022 update only has figures for first 3 or 8 years (table 1 page 4).

Plan would appear to provide sufficient for 8 years as 27 required and 31 allocated.

The figure of 30 pitches for the 10-year period 2019-2029 relates to the 'Ethnic' definition i.e. the accommodation needs of households who culturally identify as Gypsies or Travellers whether they have ceased to travel or not. This equates to 3 additional pitches per annum. The 2022 GTAA Update [SS-027] identifies a need for 27 additional pitches using the 'Ethnic' definition for the 7-year period 2022-2029 (or 3.8 additional pitches per annum). The allocation of land for 31 additional pitches means that the requirement for additional pitches during the period 2022-2029 has been met.

d) In relation to para 5.44 of 2019 assessment and households living on unauthorised encampments unauthorised and needing perm accommodation. Stated that no such families interviewed – is this is why requirement is zero or is there no unauthorised encampments?

No families residing on unauthorised encampments were identified during the 2019 GTAA [SS-018]. As such, no households were interviewed leading to a need of no additional pitches required from such households. Also, it is important to acknowledge that, if households residing on unauthorised encampments during the survey period had been identified and interviewed, only those with accommodation needs in the local authority area would have been included in the needs calculations for additional permanent pitches. Household transiting through the local authority area may lead to a need for transit provision, which the local authority are looking to address through their draft negotiated stopping policy.

e) On what basis and how realistic is the figure of 10% for those in bricks and mortar?

The 10% figure we apply to estimate accommodation needs arising from households residing in bricks and mortar accommodation is based on GTAA's undertaken by our consultants since 2010. They believe their approach is one that fairly determines the accommodation needs of households residing in bricks-and-mortar accommodation (in comparison to others who disregard those needs). This method has been incorporated into GTAA's which have been found sound by local plan examinations including Central Lincolnshire (2013 and 2020), East Staffordshire and Derbyshire (2015), South Kesteven (2016), Tunbridge Wells (2018), and Islington (2019).

f) The 2019 assessment indicates that there are 33 pitches that have planning permission but are not developed (para S8 – page 8). Do these form part of supply? If so, will they be delivered?

Yes, these are pitches which have planning permission but have yet to be developed, or pitches with planning permission that are currently not in use but could be brought back into use (step 6 of Table 5.1 and para. 5.38, 2019 GTAA [SS-018]). As stated above, this included a site of 28 pitches which was not in use at the time of the 2019 GTAA [SS-018]. It was not included in the 2022 GTAA Update [SS-027] as there is no evidence that the site has been brought back into use or will be by the end of the first 5-year period. Discussions between landowners and the Council and our consultants indicate that the landowners intend to implement planning permissions. This was stated most recently in response to site surveys undertaken to inform the July 2022 GTAA [SS-027] so is considered to be up to date position.

Questions taken from actions arising:

Action 54 - BDC to confirm why a site referred to on p58 of the 2019 GTANA is not included in the supply – quantum is 28 from 33 – BDC to confirm to the use has continued.

See answer to (a) above

Action 55 - BDC to confirm:

- **base date is in line with the rest of the plan.**
- **M1.78 figures**

See answers to (b) and (c).

The GTAA accommodation needs figures are based on contemporary evidence. It is not possible to retrospectively rebase the accommodation needs period i.e. to rebase 2022 to 2020. The base date for gypsy and travellers accommodation needs is therefore different to the rest of the plan as the evidence base was undertaken in 2019 and 2021/2022.

(c) states that the 2022 GTAA Update identifies a need for 3.8 additional pitches per annum which for 2022-2027 is 19 pitches. Its suggested that M1.78 is therefore incorrect; paragraph 7.20.4 should refer to Policy ST32 meeting the identified needs for the first five years of the Plan, and that this need will be met through the intensification and/or extension of authorised sites and/or by formalising arrangements on existing Gypsy and Traveller sites. The sites are those within ST32 1b) and 1c).

As the total number of pitches that can be accommodated on the site allocations is 31 and the overall need is for 49, the remaining need will be delivered through windfall development (to be managed through ST32 Part 2).

The Council suggests a modification is necessary to Paragraph 7.20.4 to clarify the approach to be taken to delivering the identified need.

Action 56 - Inspector questioned the approach taken to accommodating those in bricks & mortar housing (10%). BDC to clarify.

See answer to (e) above