

Matter M10: Policies for Travellers/Caravan Dwellers and Travelling Showpeople – Supplement 2

Supplement to Statement by South Cambridgeshire District Council and Cambridge City Council

Response by South Cambridgeshire District Council and Cambridge City Council to points raised by M Hargreaves at the Matter 10 Hearing regarding the Guildford Proposed Submission Local Plan (Regulation 19) Consultation June 2017

Introduction

1. At the 18 July Matter 10 Hearing, Michael Hargreaves tabled extracts from the Guildford Proposed Submission Local Plan revised Regulation 19 Consultation June 2017 regarding Gypsy and Traveller site provision.
2. As these were only provided a few hours before the hearing, the Inspector agreed that the Councils should have the opportunity to respond in writing.

Background to the Revised Regulation 19 Consultation in Guildford Borough

3. The approach taken by Guildford Borough Council to Gypsy and Traveller issues has evolved during their plan making process. The following section provides a summary of the approach at each stage:
 - **Issues and Options 2013¹**
4. The Issues and Options consultation referred to results of West Surrey 2006 GTAA, and that work has started to identify sites.
 - **Draft Local Plan strategy and sites consultation (Regulation 18) 2014²**
5. The draft plan stated that the Council will identify 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people within Guildford borough between 2012 and 2017. 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. At this point the strategy was based on the PPTS 2012 definition. Needs were based on results of the Surrey GTAA 2012. Site options for 15 Gypsy and Traveller sites were identified. In addition at major developments, the emerging strategy proposed that for 500 to 999 homes development, the Council would expect two pitches or plots, 1,000 to 1,499 homes developments, four pitches or plots, 1,500 to 1,999 homes developments six pitches or plots and 2,000 to 2,500 homes developments, eight pitches or plots.
 - **Guildford Proposed Submission Local Plan: strategy and sites consultation (Regulation 19) 2016³**

¹ <http://www.guildford.gov.uk/newlocalplan/previousconsultations>

² <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=17347&p=0>

6. The Proposed Submission Local Plan 2016 also stated that the Council would identify 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people within Guildford borough between 2012 and 2017. Between 2017 and 2027 an additional 30 pitches and 2 plots would be permitted or any new target as identified within an updated Traveller Accommodation Assessment. Although the plan references the PPTS 2015, at this point the need is still based on the previous PPTS 2012 definition which was used in the GTAA 2012.
7. Allocations were proposed to meet the identified need, through a combination of sites at new major developments, making existing temporary sites permanent with additional pitches in some cases, or new pitches on existing sites. Outside major developments, 9 sites for a total of 54 pitches were identified. Three of the sites are proposed to be removed from the Green Belt 'to ensure delivery'. All three have existing permissions for temporary sites. The six sites outside the green belt were either providing intensification of existing sites or making sites with temporary consent permanent.

- **Guildford Proposed Submission Local Plan (Regulation 19) 2017⁴**

8. Guildford Borough Council published a revised plan on 9 June 2017. Gypsy and Traveller policies were updated following completion of a 2017 GTAA. This reflected the 2015 PPTS definition. This identified a need for 4 permanent pitches for Gypsies and Travellers, and 41 permanent pitches for Gypsies and Travellers who do not meet the planning definition fall outside this allocation, and 8 unknown⁵.
9. Rather than amending the allocations identified in the previous round of plan making, the plan continues with these allocations, but states that they could be used to accommodate the needs those who do meet the definition and / or those who do not meet the planning definition⁶.
10. Policy H/1 part 6 states, '*Sufficient sites are allocated within the Local Plan to meet the 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... 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.*'
11. Guildford Borough Council has produced a Topic Paper on Housing Type, Tenure and Mix⁷ to accompany the plan. Within this document they provide further justification for their approach. The paper acknowledges that they are not required to

³ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=21293&p=0>

⁴ <http://www.guildford.gov.uk/newlocalplan/proposedsubmission>

⁵ Guildford Proposed Submission Local Plan 2017 Policy S/2

<http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=24628&p=0>

⁶ Guildford Proposed Submission Local Plan 2017 Paragraph 4.2.24

⁷ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=24612&p=0>

set targets regrading those who no longer meet the definition. They refer to meeting need in the way set out in the plan “as a pragmatic approach”, and one which provides certainty should the current high court challenge to the planning definition of traveller be successful⁸.

Comment by South Cambridgeshire District Council and Cambridge City Council on the Guildford approach and its implications for the submitted Cambridge and South Cambridgeshire Local Plans

12. As they acknowledge themselves, Guildford Borough Council have taken what then consider to be “a pragmatic approach”, based on their position in the plan making process and the chronology of plan making stages in relation to changes in national guidance and availability of needs assessments. They also comment that their approach will safeguard against any future changes to National Guidance. They have already identified and consulted on allocations at previous stages, and therefore chose to carry on with them rather than to abandon them in light of changes to national policy and fresh accommodation needs information. Their decision was based on their individual circumstances, and how their plan has evolved though plan making. It is of note that their allocations relate to existing sites or sites with temporary consent, or to provision at strategic residential sites.
13. Although Guildford state that its approach provides certainty should the planning definition be changed as a result of a challenge in the High Court, the PPTS definition remains current and will remain so unless or until quashed by a court or altered further by the Government. South Cambridgeshire and Cambridge City Councils do not consider it is reasonable or appropriate in the context of the plans here under examination to second guess any future changes in national guidance as a reason for an approach to plan making.
14. In many ways the Guildford approach does not seem to reflect the change in the definition and National planning guidance brought about by the amendments to the PPTS. Their GTAA did not identify whether those who have ceased to travel have a need for culturally appropriate accommodation. Guildford seek to allocate sites in the countryside for travellers who meet the current definition or those who do not with parity, and without any consideration of the actual extent of any need caravan-based accommodation from amongst those who have ceased to travel permanently. This approach seems to give rise to a tension with the PPTS.
15. It is also notable that the Guildford plan is presently at Regulation 19 consultation stage and, as such, the extent to which the approach is sound is far from being determined at this early stage. The weight to be attached to the approach taken in Guildford, in advance of the consistency of its approach with national planning policy within the PPTS being examined and confirmed, is limited at this stage. Given that the Guildford Plan has not yet been examined or even submitted for examination, it does not represent an approach which it is necessary to apply to South

⁸ Topic Paper 2017 Housing Type, Tenure and Mix Para 4.45

Cambridgeshire or against which the approach in the South Cambridgeshire Local Plan should be judged in terms of its soundness.

16. South Cambridgeshire District Council and Cambridge City Council consider that the material in relation to the approach within the revised regulation 19 consultation draft of the Guildford Local Plan, tabled at the hearing, does not change their position, and that the approach taken in their Local Plans as proposed to be modified is sound, for the reasons set out in their Examination statement and supplement and in their representations at the hearings.