

# LOCAL PLAN EXAMINATIONS CAMBRIDGE CITY and SOUTH CAMBRIDGESHIRE

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24 April 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 Inspector for the Council:

I refer to your letter of 10 April, the contents of which are noted. However, your letter does not include any acknowledgement of the requirements, referred to in my letter of 30 March 2017, under the Housing Act 1985 (as amended) to consider the needs of people residing in or resorting to the District with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Information in the Gypsy and Traveller Accommodation Assessment (GTAA) (2016), suggests that there are about 250 households who are currently living in caravans in the District, of whom only 11 are considered to meet the PPTS definition. Whether there are any households living on houseboats is not addressed. Appendix B to the study suggests that there may be a net requirement of 68 new pitches to meet the needs of caravan dwellers whose status in relation to the PPTS definition is unknown, and a net requirement of 61 pitches to meet the needs of households who do not meet the PPTS definition.

The National Planning Policy Framework (the Framework), at paragraph 14, requires Local Plans to meet objectively-assessed needs, other than in the circumstances defined in that paragraph. I am not aware of any provisions in the legislation or national policy which indicate that it is necessary to address only the needs of those meeting the PPTS definition, which appears to be the approach taken in the Proposed Further Modifications (and the submission Plan, albeit that relates to the previous definition).

Furthermore, I have concerns about whether criteria-based policies and the development management process are likely to meet the wider needs of caravan dwellers, bearing in mind that the development framework boundaries are quite tightly drawn round the existing developed area of villages and that, as a result, opportunities to meet the needs of caravan dwellers may be limited and would be in competition with those seeking to provide bricks and mortar housing.

In the circumstances, I still have concerns about the soundness of the Plan in relation to this issue. However, in order to move forward with the Examination, I consider that some focussed consultation on the revised GTAA and the proposed modifications should be undertaken with principal stakeholders. This should include those who made representations to the relevant policies at publication stage and any other individuals/organisations in the District who may have a recognised interest that you are aware of through the usual channels. It would be helpful to have regard to the advice on consultation in the draft Guidance in considering who to contact.

For the avoidance of any doubt, my indication that there should be only one further round of formal consultation on main modifications should not be interpreted as an indication that the general expectations for consultation in relation to the preparation of new or updated evidence should not be met.

I would be grateful if you could provide an indication of the likely timescale for a focussed consultation to inform the Examination Programme.

Laura Graham  
Inspector

I look forward to your response in due course.

Kind regards

*Gloria Alexander*

Gloria Alexander  
Programme Officer