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North Lincolnshire Council

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To the Inspectors for examining the North Lincolnshire
Local Plan via Ian Kemp- Programme Officer
Via Email to:
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Dear Inspectors: Elaine Worthington MTP MUED MRTPI, Louise Crosby MA MRTPI and Rachael Bust BSc (Hons) MA MSc LLM PhD MInstLM MCMi MEnvSci MRTPI

RE: INSPECTORS' INITIAL QUESTIONS- GYPSY AND TRAVELLER ACCOMMODATION

Further to our letter of 12 May 2023 responding to the first set of initial questions posed in your letter of the 15 December 2022. We now attach our responses to the remaining two unanswered questions (IQ 18 and IQ21) on gypsy and traveller accommodation below.

Paragraph 10 of Planning Policy for Traveller Sites advises, amongst other things that, "local planning authorities should, in producing their Local Plan:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15."

It appears from what we have read that the Council have not done this.

IQ18 It would be helpful to understand the reasons behind this and in particular if any attempts were made to find appropriate sites through a call for sites or allocating land on a part of larger residential or mixed use site, for example.

Council's Response:

At the Local Plan issues and options consultation stage (2018) on Gypsy and Traveller Provision the following questions were posed- 'Which of the options for providing Gypsy and Traveller accommodation do you support? Are there any other options that need consideration?'. The document provided the following options for consideration:

'Options for Providing Gypsy and Traveller Accommodation

- Option A Seek to allocate sites as part of residential allocations.
- Option B Seek to allocate sites specifically for Gypsies, Travellers and Travelling Showpeople.'

Support was not given for Option A and a small amount of support was given to Option B which is why Gypsy and Traveller sites have not been proposed as part of residential allocations.

The preferred options stage (2020), stated that, 'North Lincolnshire Gypsy and Traveller Accommodation Needs Assessment 2017 provides an objective assessment of future pitch requirement for Gypsy and Travellers including Travelling Showpeople in accordance with national policy. The assessment identifies that North Lincolnshire needs to find provision for 10 permanent residential pitches and 13 transit pitches. Currently North Lincolnshire has two locations (Brigg and

Kirton in Lindsey) providing permanent Gypsy and Travellers facilities. The two Brigg sites River View and Mill View currently have additional capacity to meet the future additional needs with the scope for future expansion.' At that time, no further Gypsy and Traveller sites were therefore needed as the identified need could be met through expanding existing sites.

At the Publication stage (2021) the Gypsy and Traveller Accommodation Needs Assessment was updated. The assessment identified that North Lincolnshire needs to find provision for 17 permanent residential pitches and 0 transit pitches Between 2021 and 2038. The GTAA identifies a need for 8 permanent residential pitches between the first five years of the plan. To ensure delivery the council proposed to set out a criteria based policy and work with the market to bring forward sites to meet the identified needs within the plan period, as expanding existing sites would not meet the increased needs.

The council received no proposed gypsy and traveller sites through any of the call for sites stages and have considered council owned land for this purpose but none were deemed suitable due to contamination issues or high flood risk. It is for these reasons why no allocation was identified for gypsy and traveller provision.

More recently, the Council has revisited this issue in light of any changes in circumstances, including the initial Inspector's Questions posed here and the ongoing requirements of the Planning Policy for Traveller Sites as outlined above. It has now carried out a fresh draft site assessment exercise, which has resulted in a draft proposed site allocation. Both the draft site assessment document, draft proposed site allocation and associated proposed modifications that would result can be finalised then provided if desired. We have not provided this upfront as there was the suggestion in your letter of 7/11/23, that the Council cease any work on the gypsy and traveller site as this may be abortive.

Please let us know if you would like to see this information.

IQ21 Is this approach to meeting the needs of gypsies and travellers and travelling showpeople justified, effective and consistent with national policy?

Council's Response:

Specifically identifying specific, developable sites, or broad locations, where appropriate is a requirement of Planning Policy for Traveller Sites, but deliverability within the timescale required is also a requirement. Deliverability was the concern given the council received no proposed gypsy and traveller sites through any of the call for sites stages and had previously considered council owned land for this purpose with none deemed suitable. It is for these reasons why no allocation was thus far identified for gypsy and traveller provision. As outlined above in answer to IQ18, the Council has now identified a draft proposed gypsy and traveller site allocation to meet needs.

Yours sincerely,



James Durham MRTPI
Place Planning Specialist