Ipswich Borough Council Core Strategy and Policies Development Plan Document

Proposed Focused Changes

Topic Paper: Gypsy and Traveller Accommodation 2

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How do the focused changes weight against the RSS policy and Circulars 01/06 and 04/07

The focused changes are in general conformity with the RSS dated July 2009, which requires local planning authorities to make provision for Gypsy and Travellers pitches through their DPDs. The RSS sets a provision up to 2011 and thereafter provision is based on a forecast, based on 3% population growth per year i.e. number of residential pitches should increase by 3% compound interest each year. As the Ipswich Core Strategy will not be adopted until 2011, it is considered necessary to undertake an update on the GTAA to accurately assess need over the plan period, to provide up to date position of need rather than based on a forecast. The RSS doesn’t set an accurate provision beyond 2011 therefore it is necessary for the Council to undertake its own local assessment of need.

The RSS requires Suffolk to make a provision of 20 additional transit pitches and this should include the Ipswich /Felixstowe area. It does not specify a pitch requirement to be made within Ipswich Borough Council’s administrative boundary, it states a broad location between Ipswich/Felixstowe, which is likely to be within Suffolk Coastal DC. The Core Strategy policy CS11 accords with the RSS by stating Ipswich BC will work with Suffolk County Council and neighbouring authorities to develop a transit site here.

The Inspector’s question will be addressed in further detail in the Council’s submission statement.

Meeting the Gypsy and Traveller provision
Permanent Provision
Policy CS11 clearly states the Council’s intention to identify and deliver additional permanent pitches in accordance with local assessment of need. The local assessment process will feed into the Site Allocations DPD, which will identify where all the pitches will be found, including those outside the administrative area. A Sustainability Appraisal will be undertaken to take account of all the alternative sites, including those outside the administrative area. Site identification and delivery will be monitored through the Gypsy and Traveller Steering Group and Ipswich Borough Council’s Annual Monitoring Report. The 5 yearly updates to the GTAA, may necessitate further site allocations over the course of the plan period. The Site Allocations DPD may need to be reviewed from time to time in order to identify additional need.

The GTAA 2007 study requires 1-3 permanent pitches in Ipswich for the period 2006-2011. Provision for 11 pitches in Ipswich for the period 2011 to 2016 is a prediction based on 3% per year household growth rate applied to households on existing authorised provision and new households forming in the areas between 2006-2011. An update assessment of provision beyond 2011 is therefore required.
The Suffolk Gypsy and Traveller Accommodation Sub Group have undertaken to update the GTAA in 2011 to assess the requirements for the period 2011 to 2016 and beyond. The results of this assessment, which are expected to be published at the end of 2011, will inform the review of the Core Strategy in 2013 and site allocations in IP-One AAP and Site Allocations DPD.

Ipswich Borough Council proposes to identify a family sized site of 5-6 permanent pitches in the next 5 years in or close to Ipswich, as stated in the Ipswich Housing Statement and Strategic Action Plan 2010/11-2015/16. The Council is working with neighbouring authorities, through the Gypsy and Traveller Accommodation Sub Group to seek to identify and deliver a suitable site. The size of site accords with the CLG Designing Gypsy and Traveller Sites: Good Practice Guide which recognises that smaller sites can be successful, particularly where designed for one extended family and more than meets the GTAA requirements up to 2011 of 1-3 pitches. This will meet the council’s permanent pitch requirements of up to and beyond 2011.

The GTAA says local authorities should prioritise permanent pitches before transit pitches, as the demand for transit pitches is inflated by lack of permanent pitches.

The Council’s approach to provision accords with the Government’s intentions as set out in Consultation Draft PPS: Planning for Traveller Sites published 13th April 2011 which states at para 3.14 that local planning authorities should plan for a 5 year supply of travellers pitches/plots.

**Transit Provision**

Policy CS11 clearly states the Council intention to work with Suffolk County Council and neighbouring authorities to develop a transit site. A suitable site will be identified through the local assessment process and will feed into the Site Allocations DPD. A Sustainability Appraisal will be undertaken of all the alternative sites, taking account of available sites outside the administrative area. Site identification and delivery will be monitored through the Gypsy and Traveller Steering Group and Ipswich Borough Council’s Annual Monitoring Report. The 5 yearly updates to the GTAA, may necessitate further site allocations over the course of the plan period. The Site Allocations DPD may need to be reviewed from time to time in order to identify additional need.

The transit pitch requirements of the RSS set provision for the whole of Suffolk, but specifically identify provision should be made in Ipswich/Felixstowe area. It states that the location and size should be defined through local studies.

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1 Ipswich Borough Council, Ipswich Housing Statement and Strategic Action Plan 2010/11-2015/16, pages 7 and 14, Core Document Library PCD83
2 CLG Designing Gypsy and Traveller Sites: Good Practice, para 4.7, page 21, Core Document Library: PCD78.
The GTAA says ‘the authorities should develop one new transit site as a pilot scheme in the near future and monitor its usage and management in order to learn lessons for further provision’.4

The RSS recognized that there was a need for 20 transit pitches in the whole of Suffolk whereas the GTAA study stated an estimated need for 10 pitches in each authority, which in our view was too high. The RSS single issue review tested the GTAA findings and recommended a figure of 20 pitches for Suffolk.

Given the locational requirements of transit pitch sites, being located close to trunk road network, this provision is likely to be met outside the Borough boundary.

**Travelling Showpeople**

Paragraph 4.79 of the GTAA states there are no unauthorised encampments, which suggest no demand.5 The GTAA update will assess requirements after 2011.

**Evidence of cross boundary working**

A statement of intent to cross boundary working will be submitted in advance of the submission of other evidence.

Ipswich Borough Council is committed to working with neighbouring authorities through the Gypsy and Traveller Steering Group and Accommodation Sub Group in planning for provision and delivery of gypsy and traveller sites across Suffolk. The group established in 2006 and has representatives from all Suffolk local authorities including the police, PCT and Children and Young People’s Services who work together to coordinate improve services for Gypsies and Travellers in Suffolk, whilst balancing the needs of the settled communities.

The Gypsy and Traveller Steering Group and the Accommodation Sub Group meet regularly (every 12 weeks and 8 weeks respectively) to discuss cross boundary joint working. The meetings show that the individual districts and boroughs are initially focussing on meeting permanent pitch provision. The monitoring work undertaken by the Social Inclusion and Diversity team at Suffolk County Council, headed by Keren Wright, Gypsy and Traveller Liaison Officer informs the groups’ action plan. See Gypsy and Traveller Countywide Action Plan 2009-2011, which is incorporated into the Gypsy and Travellers Strategy 2009-2011.6

Suffolk County Council keep records of unauthorised encampments occurring throughout the county, the highest incidence of these is in Mid Suffolk DC,
therefore the group is focussing on meeting transit provision in this district first.

The Accommodation Sub Group was instrumental in commissioning of the GTAA 2007 five authorities cross boundary study and has agreed to review the GTAA to identify needs beyond 2011.


The cross boundary approach accords with the Government stated intention as set out in PPS Consultation on Planning for Travellers Sites, para 2.9, page 11, which states that ‘abolishing regional strategies will remove the system of top-down housing and traveller site targets that were set by regional planning bodies. It will instead make local planning authorities responsible for determining the right level of site provision in their area and in consultation with local communities’. Para 2.10 goes on to say the ‘top-down imposition of development will be replaced with a duty on councils to work together across boundaries in a way that reflects their genuine shared interests. The introduction of this duty to cooperate should result in greater understanding and achievement of shared aims. The reforms will lead to a more collaborative planning system’.

Ipswich Borough Council’s commitment

Post 2011 requirement
Policy CS11 makes provision for post 2011 in paragraph 7 of the policy, where it states ‘If site allocations through the Local Development Framework are needed within Ipswich up to 2021, they will be progressed through the Site Allocations and Policies development plan document or the IP-One AAP’. If the inspector considers it helpful, the council would be willing to insert a sentence to para 8.120, after the first sentence stating as follows; ‘Thereafter provision will be made in accordance with local assessment of need’.

Fall back position
Ipswich Borough Council is committed to providing 5-6 pitches in the next 5 years as indicated in the Housing Statement and Strategic Action Plan. The Council will continue working with gypsy and traveller community, the county, neighbouring authorities and partners to identify a suitable site and ensure this provision is met. A review of the GTAA will be undertaken to assess need beyond 2011. The council will make provision in accordance with these requirements and this will be reflected in the Housing Statement and Strategic Action Plan.

7 CLG Consultation Draft PPS: Planning for Traveller Sites published 13th April 2011, para 2.9, page 11, Core Document Library PCD79
8 CLG Consultation Draft PPS: Planning for Traveller Sites published 13th April 2011, para 2.10, page 12, Core Document Library PCD79
The Council is working with all neighboring authorities including Mid Suffolk, Babergh and Suffolk Coastal District Council to seek to deliver a transit site. In the event that updates to the GTAA indicate unmet need, the council could provide Temporary Stopping Places, within the borough boundary or on Ipswich Borough Council controlled land beyond the Borough boundary.

How will cross boundary be monitored
Gypsy and Traveller provision will be monitored through the Gypsy and Traveller Steering Group and Ipswich Borough Council’s Annual Monitoring Report.