

Ipswich Borough Council Final Draft Local Plan Review

Matter 3 – Housing Provision, Gypsy and Traveller Accommodation Tasks Arising from Hearing Session 3, Day 6

January 2021

Planning Policy
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

planningpolicy@ipswich.gov.uk

www.ipswich.gov.uk/localplan

Tel: 01473 432019

Figure 1: Comparison between the base year of the 2017 Gypsies and Travellers ANA and the position in December 2020

PINS: Update table A.3 in ANA [D17] to include 2020 G&TA need and supply figures alongside 2016/2017 figures for Ipswich. Table A.3: Five year estimate of the need for permanent/residential site pitches (2016-2021)		Update position at December 2020 ¹
1) Current occupied permanent / residential site pitches	39 (37 West Meadow; 2 Henniker Road) In base year 2016/17	45 (43 West Meadow; 2 Henniker Road) An increase of 6
<i>Current residential supply</i>		
2) Number of unused residential pitches available** (figures relate to West Meadows only)	5	5 (different pitches from 2017)
3) Number of existing pitches expected to become vacant through mortality 2016-2021 (figures relate to West Meadows only)	1	1
4) Number of family units on sites expected to leave the area in the next 5 years (figures relate to West Meadows only)	0	4 (6 pitches vacant from families leaving and 2 families re-occupying vacant pitches on the West Meadows site)
5) Number of family units on sites expected to move into housing in the next 5 years (figures relate to West Meadows only)	2	2
6) Residential pitches planned to be built or to be brought back into use 2016-2021	0	0
7) Less pitches with temporary planning permission	0	0
Total Supply	8	12 (steps 2 to 7)*(plus 6 from step 1)
<i>Current residential need: Pitches</i>		
8) Family units (on pitches) seeking residential pitches in the area, 2016-2021, excluding those already counted as moving due to overcrowding in step 12	7	2

9) Family units on unauthorised encampments requiring residential pitches in the area	0	1
10) Family units on unauthorised developments requiring residential pitches in the area	0	2
11) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	1	1
12) New family units expected to arrive from elsewhere	0	2
13) New family formations expected to arise from within existing family units on sites	9	9
Total Need	17	17
<i>Current residential need: Housing</i>		
14) Family units in housing but with a psychological aversion to housed accommodation	4	0
Total Need	21	17 (steps 8 to 14)
<i>Balance of Need and Supply</i>		
Total Need	21	17
Less total supply	8	18
Total Additional Pitch Requirement	13*	-1
Annualised Additional Pitch Requirement	3	3

*The new total supply in 2020 results in a potential supply of 12 pitches (plus the additional occupied pitches of 6). Step 1 equals 45 pitches (increase of 6 since 2017 ANA; step 2 equals 5; step 3 equals 1; step 4 equals 4; step 5 equals 2; step 6 equals 0; step 7 equals 0. The total additional supply therefore is 12 (plus 6 from step 1).

** Including vacant pitches is a normal part of the exercise, because you are measuring the number of pitches and available at a given time against the identified need. This means that there is no double counting.

¹ The position at December 2020 has been determined as a result of desk-based work and interviews with key officers (please see I29 and IBC Matter Statement for Matter 3, J7). It is subject to final confirmation through site visits.

The net need in the first 5 years has been met through the additional 6 pitches. The additional pitches have been occupied by people with need as identified in 2017, and only 2 families have moved onto the West Meadow site from outside of the area (step 12). The first 5 years need has therefore been met. As outlined below:

- Additional supply =18 (12 as above plus the 6 additional spaces identified in Step 1);
- Need = 17;
- Additional need arising from 2017-2021 to be carried forward to years 5-10 = minus 1 because 17(need) minus 18(supply) is minus 1 so the first 5 years (2016/17 to 2021/22) has already been met in terms of pitch space.

The total residential need at December 2020 has reduced from 21 in 2017 to 17 in 2020 due to families leaving and other needs identified in 2017 being met such as those with an aversion to permanent housing being met.

For the period years 5-10 of the ANA, there is a requirement for 4 permanent pitches in the ANA for the Borough. Because 1 additional pitch to the first 5-year requirement has been provided in the first five years, this pitch requirement figure for Years 5-10 of the ANA has reduced to three additional pitches (4-1 pitches). To the end of the plan period, beyond years 5-10 the ANA requires an additional 10 pitches ie from 2027 to 2036, the end of the plan period. So, from 2021 to the end of the plan period the need is 13 additional pitches.

The 2020 Aerial Survey for the West Meadows site identifies the locations of the additional pitch space provision that has been provided between 2016 and 2020 (ignoring the incursion into Mid Suffolk District to the south). In addition, several pitches have been subdivided in the south-east corner of the allocation which contributes to meeting the need requirement overall in the first 5-year period of the ANA (2017).

There is sufficient vacant land to accommodate up to a further 13 pitches using some of the land the north-west and the east of the site within the existing allocation boundary , (the marked area in the east for example can accommodate up to 5/6 pitches - based on a standard 386sq m pitch space as can the area marked to the north west); and there is some capacity for limited subdivision of existing pitches elsewhere in areas which have already been the source of change between 2017-2020. The existing allocation has potential to be enlarged to the Borough boundary adjoining the south-west and south-east boundaries of the allocation. (See Figures 2 and 3 overleaf.)

This allows for potential within the West Meadow site to provide sufficient pitch space for the plan period to 2036 to meet the needs identified in the 2017 ANA and the 2020 update. Indeed, the land proposed as an enlargement of the allocation in the southwest alone, is sufficient for 13 pitches in total meeting the whole identified need for the post 2021 remaining plan period. Through this new allocation, there is capacity to ensure that site layout meets required standards when the existing site at West Meadow is site visited and sufficient flexibility and capacity to:

- Accommodate any additional need for pitch space that arises over the plan period;
- Accommodate existing pitch amendments to the site as currently laid out such as additional dayrooms or vehicle parking space; and
- Ensure that the site layout does not become over-crowded and meets the Government space requirements.

In conclusion then, West Meadow site has the capacity with the extension to the allocation, and pockets of space within and adjoining the existing allocation to meet the pitch need for the gypsy and travelling community for the whole of the plan period with some additional flexibility should needs change or the existing layout requires more space in order to meet design requirements set out by Government.

Evidence of delivery West Meadow 2016-2020

Figures 2 and 3 show where there have been changes to the layout and additional pitches at the West Meadows site. The Council identifies that some of those enlarged areas showing additional pitch spaces have areas which are not fully developed. Therefore, there is scope to improve the layout on areas where there is evidence of new pitch space and potential for some additional pitch space. For example, the rectangular hatched area to the west in the lower portion of the site can clearly accommodate an additional number of spaces.

Figure 2: 2016 position (IBC Aerial Map July 2016)



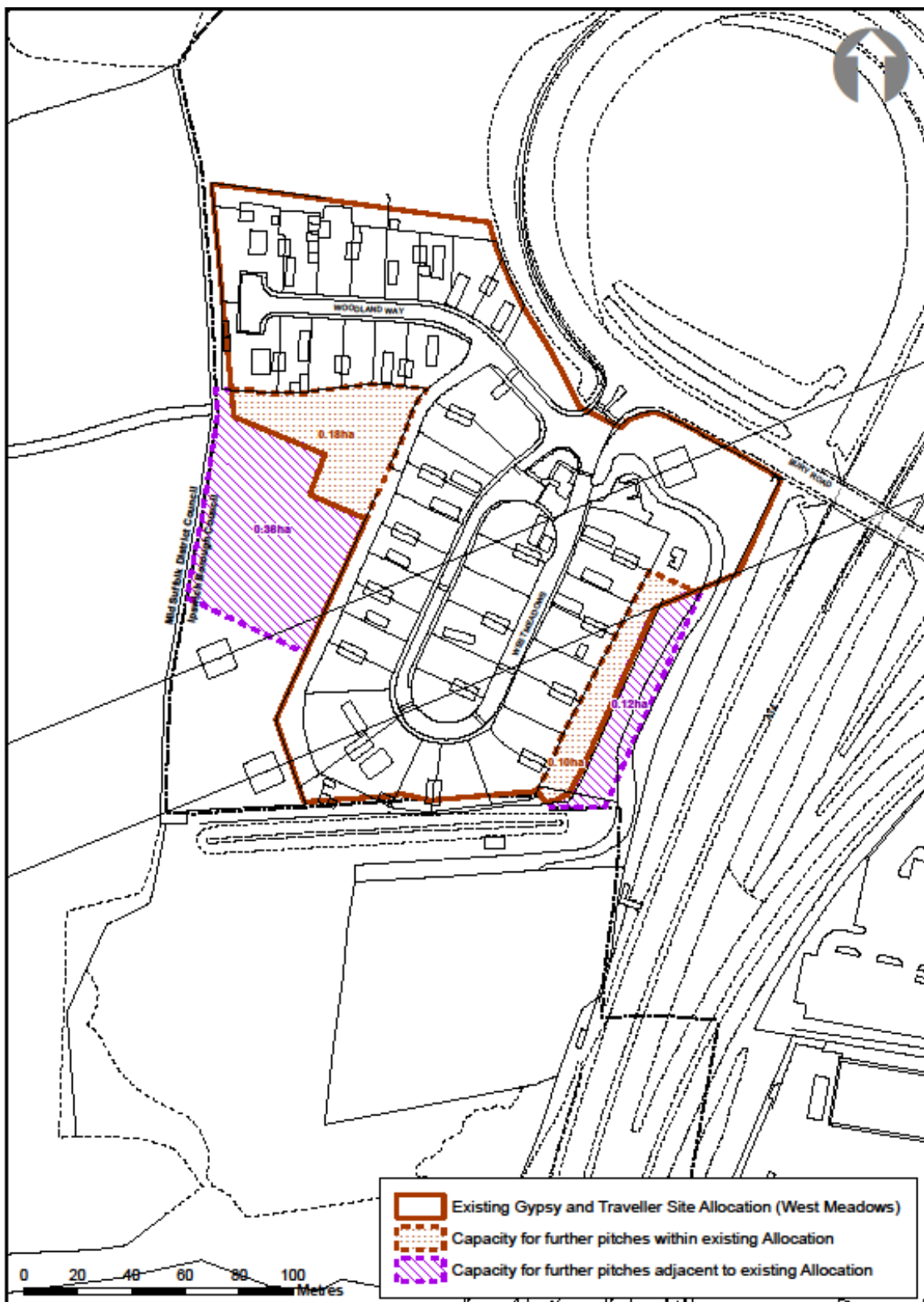
Imagery copyright Getmapping PLC 2016. www.getmapping.com.
© Crown copyright and database right 2020. Ordnance Survey Licence number 100021566. Ipswich Borough Council.

Figure 3: West Meadow 2020 – base identifying areas of change to July 2020, using the IBC July 2020 Aerial survey.



Imagery copyright Getmapping PLC 2020. www.getmapping.com.
© Crown copyright and database right 2020. Ordnance Survey Licence number 100021566. Ipswich Borough Council.

Figure 4: Existing Ordnance Survey Map – identifying areas that can encompass additional capacity, existing used pitch space and potential allocation extensions proposed



© Crown copyright and database right 2020. Ordnance Survey Licence number 100021566. Ipswich Borough Council.

To ensure that the layout of the site meets current government standards it is important that the site as a whole does not become overcrowded. It is proposed that the existing allocation is marginally enlarged as indicated above to ensure:

- That the site as a whole if required is capable of providing the Council's required pitch space to the end of the plan period (2036); and
- At the same time ensuring that the setting and design requirements laid out in government guidance can be accommodated.

Policy CS11 – Gypsy and Traveller Accommodation

This policy and supporting text has already been subject to a number of changes, largely to reflect the agreement for the ISPA authorities to meet their own identified needs for permanent pitches within their own boundaries and to reflect the current position regarding the provision of transit and stopping places where a countywide approach is being taken. (see Main modifications MM33 to MM35 – as outlined in the Appendix). However, there are additional changes required to CS 11- and lower-case text to reflect changes to the identified need for permanent pitch space through the 2020 update work.

Proposed MMS to Policy CS11

POLICY CS11: Gypsy and Traveller Accommodation

- 8.32 Local housing authorities will continue to decide how best to undertake their duties to assess the needs of all their residents and those who reside in their area. This will be in accordance with the legal obligations in the Equality Act 2010. National planning policy for Gypsies and Travellers is set out in Planning Policy for Traveller Sites (2015) and requires planning authorities to use their evidence to plan positively to meet the needs of Gypsies & Travellers and Travelling Show People and Boat People.
- 8.33 ~~Ipswich has 43 permanent pitches for Gypsies and Travellers at present, and~~ The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) 2017 identified the Borough's needs from 2016 to 2036 as 27 pitches. However, an update to the need and supply position in Ipswich undertaken during 2020 indicates that the need for pitches 2016-2021 has been met through changes at the existing West Meadow site, including through families moving away and reorganisation of pitches. As a result, there is outstanding need for 13 additional pitches to be provided 2021-36.
- 8.34 There is scope at the West Meadow site to meet the additional need over the plan period and an extension is proposed to the west of the allocation (0.38ha) and to the east of the existing allocation (0.12ha) as sites IP400a and IP400b to ensure that the needs of the remaining plan period 2021-2036 can be met and to ensure that the site can meet Government design requirements and expectations. Therefore, the Council's approach is to continue to protect the West Meadow site, but also to proactively work with families so that they can bring forward small sites which better meet their needs. Therefore, in addition to the extensions proposed at West Meadows, a criteria-based approach is set out in policy CS11.
- 8.35 ~~In addition,~~ National guidance requires the Core Strategy to include a criteria based policy to guide the siting and location of sites for Gypsies and Travellers. The

accommodation needs of Gypsies and Travellers need to be considered alongside those of the 'settled' population. The revised national Planning Policy for Traveller Sites, published in August 2015, amends the definition of Gypsies and Travellers for planning purposes to exclude those who have ceased travelling permanently.

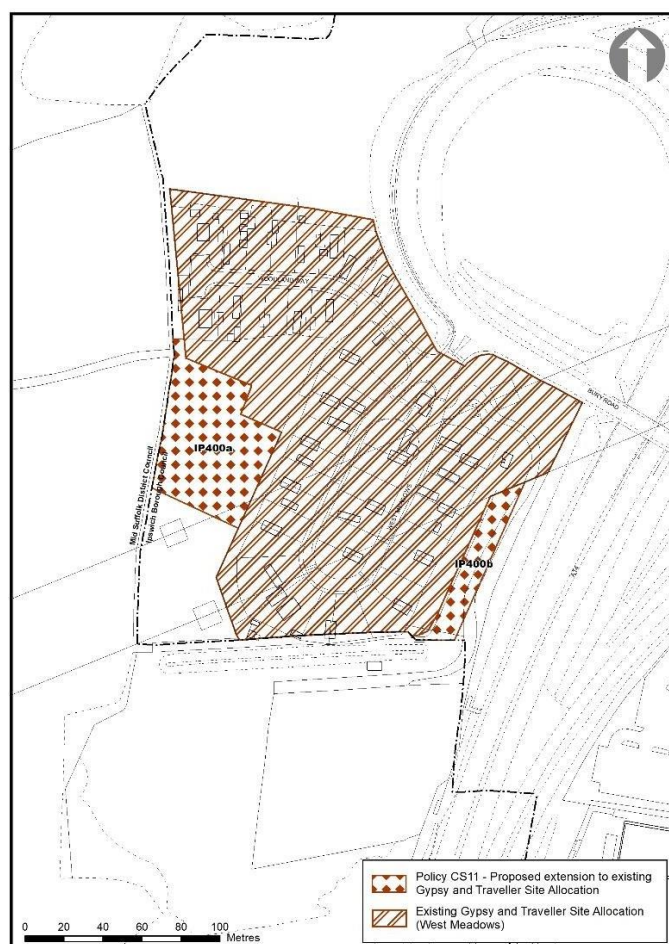
- 8.36 ~~Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich Strategic Planning Area. The policy will provide the context for the ongoing provision of pitches over the plan period.~~

POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION

Provision will be found within the Ipswich Borough ~~where possible~~ for additional permanent pitches to meet the need for ~~2713~~ permanent pitches ~~2021~~ to 2036, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment 2017 and updated to reflect changes in need and provision at 2020. ~~Where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.~~

Two extensions to the existing West Meadows Gypsy and Traveller site are proposed:

- IP400a - an extension is proposed to the west of the allocation (0.38ha); and
- IP400b - to the east of the existing allocation (0.12ha)



© Crown copyright and database right 2021. Ordnance Survey Licence number 100021566. Ipswich Borough Council.

to ensure that the pitch requirements to meet the needs of gypsies and travellers in the remaining ANA (2017) period 2021-2036 can be met and to ensure that the site as a whole can meet Government design requirements and expectations. Sufficient land will therefore be available at the West Meadow site to accommodate the need for 13 additional pitches to the end of the plan period and to provide some additional flexibility if demand for additional pitches changes over the plan period.

However, It is anticipated that provision for smaller sites for family groups better meet the identified needs of gypsies and the travelling community. This will ensure greater social cohesion with the settled community and this is the preferred option. It is anticipated that ~~this~~ such sites will be delivered through working closely with the gypsy and travelling community to bring forward appropriate planning applications. ~~normal development management functions.~~

The Council's identified need is for 27 permanent pitches between 2016-2036. Additional work in 2020 indicated that the ~~The 5 year supply is for 13 permanent pitches which annually requires, 3 pitches a year.~~ The need for pitches 2016-2021 has been met and the outstanding need for the rest of the plan period is 13 pitches.

If Pitch provision is not delivered as anticipated, progress does not move forward, the Council will conduct a focussed review within 5 years and the results of this would feed into the next local plan as positive allocations.

Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.

Applications for the provision of permanent pitches will be considered against the following criteria:

- ~~a. The existing level of local provision and need for sites;~~
- ~~b. The availability (or lack) of alternative accommodation for the applicants; and~~
- c. Applications for the provision of permanent pitches from or on behalf of persons ~~Other personal circumstances of the applicant, including the proposed occupants must meeting~~ the definition of Gypsy or Traveller will be supported subject to satisfying the criteria below:

Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.

- ~~d.~~a. The site should be located:
 - i. where it would be well served by the road network; and
 - ii. where it would be well related to basic services including the public transport network.
- ~~e.~~b. The site should be:
 - i. accessible safely on foot, by cycle and by vehicle;
 - ii. free from flood risk and significant contamination;
 - iii. safe and free from pollution;
 - iv. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities;
 - v. proportionate in size to any nearby settlements, to support community cohesion; and
 - vi. where possible, located on previously developed land.
- ~~f.~~c. The site should not have a significant adverse impact on:
 - i. the residential amenity of immediate or close neighbours;
 - ii. the appearance and character of the open countryside;
 - iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities;
 - iv. heritage assets including their setting; and
 - v. the physical and social infrastructure of local settlements.

Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.

The Council will work with Suffolk County Council and ~~neighbouring other local authorities in Suffolk to deliver identified needs for short stay stopping sites within Suffolk. develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.~~

~~The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.~~

~~Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.~~

- 8.37 Sites for Gypsies and Travellers could be privately or publicly provided - the criteria will apply equally to both, as they are about creating safe and healthy living conditions and providing sites within a reasonable distance of basic services such as schooling. Basic services include primary school, secondary school, convenience store, health centre or GP surgery, children's play facility, pharmacy and meeting place.
- 8.38 ~~Sites will be sought to meet the joint needs of Ipswich and neighbouring authorities for permanent pitches within the Ipswich Strategic Planning Area. Need for Ipswich and its neighbouring authorities was identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) carried out in 2017 by RRR Consultancy Ltd. The 2017 ANA identified a need for 27 pitches in Ipswich Borough 2016 to 2036, out of a need for 52 pitches across the five local authority areas included in the assessment (Ipswich, Babergh, Mid-Suffolk, the former Suffolk Coastal area and Waveney). The update undertaken in 2020 shows that the first 5 years need (2017-2021) has been met through subdivision, new pitches and families permanently leaving the area. need for 13 pitches 2016-2021 has been met with 14 pitches gained. Of the 13 pitches required ~~pitches needed~~ in Ipswich over the rest of the plan period (2021-2036), ~~13~~ 3 are needed between ~~2016 and 2021~~, 4 between 2021 and 2026, 5 between 2026 and 2031 and 5 between 2031 and 2036. No need was identified in Ipswich for the other types of provision.~~
- 8.39 ~~The Council will work with Suffolk authorities to meet the joint transit (short stay) and permanent needs and the needs of travelling showpeople. The ANA identifies a need for three short stay sites across the study area. The short stay work is both identifying suitable sites and developing a countywide short stay policy with local authorities and the police.~~
- 8.40 ~~Just as affordable housing is delivered through the planning system in larger housing developments where there is a local need, so the needs of Gypsies and Travellers should be met in a more systematic manner.~~
- 8.41 The Council will work with the Gypsy and Traveller communities to ascertain need in particular locations, prior to the identification or allocation of sites. Pitch demand will be kept under review.
- 8.42 The existing site at West Meadows is a large one containing 42 pitches in 2017 (37 occupied plus 5 unused) In 2020 the site had enlarged to 48 pitches (43 occupied plus 5 unoccupied) making an increase of 6 pitches. Whilst the Council would not limit the size of new sites, anecdotal strong evidence through the ANA of preferences in the Gypsy and Traveller community locally is for smaller sites to provide pitches for family groups.
- 8.43 Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' for flood risk as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance, are not permitted in Flood Zone 3 and

require the exception test in Flood Zone 2. This is because, these developments are very difficult to make safe through raised flood levels.

8.44 This policy supports plan objectives 3 and 10.

Appendix 5 – Existing Main Modifications (these are unaffected by the proposed additional modifications.

MM33	80	Paragraph 8.141	<p>Modification to paragraph 8.141:</p> <p>Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich Strategic Planning Area. The policy will provide the context for the ongoing provision of pitches over the plan period.</p>	To reflect the SoCG agreed with Babergh & Mid Suffolk District Councils.
MM34	80 – 81	Policy CS11	<p>Modification to Policy CS11: Gypsy and Traveller Accommodation:</p> <p>POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION Provision will be found within the Ipswich Borough where possible for additional permanent pitches to meet the need for 27 permanent pitches to 2036, as identified through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment 2017. Where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision.</p>	To reflect the SoCG agreed with Babergh & Mid Suffolk District Councils and SoCG agreed with East
			<p><u>It is anticipated that provision for smaller sites for family groups better meet the identified needs of gypsies and the travelling community. This will ensure greater social cohesion with the settled community and this is the preferred option. It is anticipated that this will be delivered through normal development management functions.</u></p> <p><u>The Council's identified need is for 27 permanent pitches between 2016-2036. The 5-year supply is for 13 permanent pitches which annually requires, 3 pitches a year.</u></p> <p><u>If progress does not move forward, the Council will conduct a focussed review within 5 years and the results of this would feed into the next local plan as positive allocations.</u></p> <p>Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.</p> <p>Applications for the provision of permanent pitches will be considered against the following criteria:</p> <ul style="list-style-type: none"> a. The existing level of local provision and need for sites; b. The availability (or lack) of alternative accommodation for the applicants; and c. Other personal circumstances of the applicant, including <u>that</u> the proposed occupants must meet the definition of Gypsy or Traveller. <p>Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.</p> <ul style="list-style-type: none"> d. The site should be located: <ul style="list-style-type: none"> i. where it would be well served by the road network; and ii. where it would be well related to basic services including the public transport network. e. The site should be: <ul style="list-style-type: none"> i. accessible safely on foot, by cycle and by vehicle; ii. free from flood risk and significant contamination; iii. safe and free from pollution; iv. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities; v. proportionate in size to any nearby settlements, to support community cohesion; and vi. where possible, located on previously developed land. f. The site should not have a significant adverse impact on: <ul style="list-style-type: none"> i. the residential amenity of immediate or close neighbours; ii. the appearance and character of the open countryside; iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities; 	Suffolk Council.

			<p>iv. heritage assets including their setting; and</p> <p>v. the physical and social infrastructure of local settlements.</p> <p>Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.</p> <p>The Council will work with Suffolk County Council and neighbouring other local authorities in Suffolk to deliver identified needs for short stay stopping sites within Suffolk. develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.</p> <p>The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.</p> <p>Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.</p>	
MM35	81	Paragraph 8.114	<p>Modification to paragraph 8.114:</p> <p>The ANA identifies a need for three short stay sites across the study area. <u>The short stay work is both identifying suitable sites and developing a county-wide short stay policy with local authorities and the Police.</u></p>	In response to question 52 of the MIQs