

## **Breckland Council Response to Inspector's Initial Questions**

### **Provision for Travellers and Travelling Showpeople**

**2. Policy HOU 08 of the Plan identifies a need for 10 additional pitches for gypsy and traveller households, of which 7 should be provided for in the first five years of the Plan. In addition, there is a requirement for 2 plots for travelling show people that need to be delivered in years 11-15 of the Plan. Does this mean within the first 5 years of the Plan period (2011- 2016) or from the adoption of the Plan (anticipated 2018)?**

The Gypsy and Traveller Accommodation Needs Assessment (LP/H/2) covers the period 2016-2036. The first five years is as set out within the document and covers the period 2016-2021. This is also included within Table 3.1 of the submission plan.

**3. The Council has not sought to make provision for this identified need through site allocations, but relies on a criteria based policy. What is the justification for this approach, given that there is an identified need within the first 5 years of the Plan? In addition, what efforts have been made to identify potential sites? Is this set out in the evidence base for the Plan?**

The Council's proposed approach to Gypsy and Travellers is set out within Policy HOU08 which supports the expansion of existing sites and the provision of new sites. As referenced in response to question 2, the Gypsy and Traveller Accommodation Needs Assessment (GTANA) (LP/H/2) provides the evidence base on need.

Through the preparation of the Local Plan the Council carried out a call for sites (including for Gypsy and Traveller sites) in 2013. Additional calls for sites also occurred alongside the regulation 18 Issues and Options and Preferred Directions consultations. During these consultations a single site for Gypsy and Travellers was submitted to the Council (site reference LP[002]028). This site was included within the Preferred Directions – Part 2 Emerging Site Options consultation. The site was not proposed for allocation due to objections from Norfolk County Council highways on the inability to achieve safe access to the site. No further sites were promoted to the Council through the call for sites. Due to the lack of sites submitted for Gypsy and Traveller use alternative approaches rather than allocation were considered.

When carrying out the assessment of need in the GTANA, a number of unauthorised sites and sites with temporary planning permission were identified. The GTANA takes account of both supply and demand to provide a net figure of assessed or projected need. When calculating the need only sites with permanent planning permission and sites that have been recognised as long term tolerated and exempt from enforcement action are counted as supply. Sites which are unauthorised and not tolerated are excluded from the supply calculation. Therefore for the purposes of the GTANA these permissions were counted as components of need.

The Council is looking at the regularisation of the temporary, unauthorised and some tolerated sites considering their planning history and the potential for the sites to be considered lawful due to the passage of time. Initial work including a planning history check of each of these sites, indicate that they meet the requirement of a certificate of lawful use due to being in situ for a period of at least 10 years. For those that meet the requirements,

the level of unmet need contained with the GTANA would therefore be reduced. This approach ensures that the need assessment is taking account of all supply within the District that is capable of being counted for the purposes of the GTANA.

The work undertaken to date on the regularisation of sites has shown that there are 7 pitches across 4 sites which can be regularised. This presents a sufficient supply to yield enough pitches to meet the requirement of the first five years of the plan. Beyond the first five years the Council consider a criteria based policy to be appropriate for meeting need.

In addition to the above, the Council propose to proactively write to all those who submitted land for residential development to establish whether they would support the use of a gypsy site on their land.

### **Approach to Saved Policies**

**4. There are several 'Saved' policies / allocations that are imbedded into the Local Plan that were adopted as part of the Breckland Site Specific Policies and Proposals Development Plan Document and the Thetford Area Action Plan (AAP). These include:**

- Saved Policy D5 – Land at Dereham Business Park**
- Saved Policy SW2 – Land to the North of the Eco-Tech Centre**
- Saved Policy SW3 – Land to the West of the Eco-Tech Employment Area**
- Saved Policy TH30 – New Employment Land (of the Thetford AAP)**

**5. I would like clarification on the Council's approach to these policies. For example, the Plan at Pages 28 and 29 identifies the policies of the Thetford AAP that will remain and those that will be replaced. This includes Policy TH30 – New Employment Land. However, later in the Plan on Page 192 Policy TH30 is set out in full and appears to repeat the supporting text set out in the AAP. In addition, representations have been made about these policies. My assumption therefore, is that these policies (including TH30) appear to form a part of the Plan which has been submitted for examination. Please confirm.**

**6. On a related matter, the Council has not included a list of policies that will be replaced by the policies of the Local Plan, once adopted. This is a formal requirement and I request that the Council provide a list as soon as possible.**

A complete list of all currently adopted policies within the Core Strategy, Site Specifics and Thetford Area Action Plan and details of whether they are being replaced or saved by the Local Plan policies is included at Appendix A of this response.

In relation to the employment policies, saved policy D5, SW2, SW3 and TH30, these form an important element of the supply of employment land in Breckland. The policies relate to the supply of land and were included in full in the pre-submission publication to clarify their role in meeting the requirements of Policy EC01 Economic Development which references the policies. It is the Council's opinion that these policies should be viewed as saved policies.