

Central Lincolnshire: Meeting the Accommodation Needs of Gypsies and Travellers

April 2021

RRR Consultancy Ltd



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Overview

- 1.1 The purpose of this document is to confirm current pitch accommodation supply and need within the Central Lincolnshire Local Plan area. It also outlines potential ways in which accommodation need could be met. In preparation for the newly forming Local Plan *RRR Consultancy Ltd* has been commissioned to review the accommodation supply and need of the Gypsy and Traveller and Showpeople communities and to assist in the identification of land to meet accommodation need.
- 1.2 Whilst the 2020 Central Lincolnshire GTAA provided two needs figures ('ethnic' and 'PPTS'), this report focuses on identifying land to meet the PPTS 2015 accommodation needs requirements. It recommends that the Central Lincolnshire Local Plan seeks to meet the PPTS (as required) need of 32 additional pitches during the period 2019-2040, along with the 'ethnic' need of a further 9 additional pitches (potential need) are covered by a criteria-based policy, and that this policy should include that the council is working with the families with additional accommodation need in meeting that need. This approach has already proven successful, as it is the method used in meeting the first five-year need (5 pitches in West Lindsey).
- 1.3 As the 2020 GTAA identified no additional accommodation need for Travelling Showpeople plots during the period 2019-2040, this report focuses on the accommodation needs of Gypsies and Travellers. Also, as Central Lincolnshire is seeking to address Gypsies and Travellers accommodation need across Central Lincolnshire rather than on a Local Plan Authority basis, it focuses on the collective supply and need, and how the collective need can be met, through working with the families.

Aims and objectives

- 1.4 The key aims and objectives of the report include:
 - Research and summarise findings into the merits of safeguarding existing sites.
 - Examine the planning history of sites with accommodation need.
 - Consultation with families with accommodation need to discuss options.
 - Contact landowners who have expressed interest in developing sites.

Accommodation need

- 1.5 Based on the 2020 GTAA, there is an overall accommodation need in the Central Lincolnshire area for the period 2019-2024 -4 (PPTS 2015) Gypsy and Traveller pitches. The accommodation need of -4 pitches in Central Lincolnshire is due to the number of vacant pitches in the study area (mainly located in Lincoln).
- 1.6 For the period 2019-2040, the 2020 GTAA identified a need for 32 additional pitches based on the PPTS 2015 definition. It also recommends the accommodation need is met across the three Central Lincolnshire local authorities.
- 1.7 It is further recommended that the Central Lincolnshire local authorities adopt a negotiated stopping place policy to deal with transient encampments, and that they work with neighbouring authorities across Lincolnshire to developing a countywide policy. This includes land temporarily used as authorised short-term (less than 28 days) stopping places. The land does not have to be specifically identified within the policy, as locations can change over time and can even be determined by where encampments arise. The land is unlikely to require planning permission if in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the location will only be used for a proportion of the year and that individual households will normally only stay on the agreed location for a few days. Amenities such as portaloos and showers (or access to alternative nearby facilities) and skips or wheelie bins could be made available for the duration of the agreed period.
- 1.8 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community.
- 1.9 The following tables summarise the additional accommodation needs of Central Lincolnshire as a whole, followed by each constituent Central Lincolnshire local authority.

Period	Ethnic definition	PPTS 2015 definition
Total 2019-24	5	-4
Total 2024-29	10	10
Total 2029-34	11	11
Total 2034-40	15	15
Total 2019-40	41	32

Source: GTAA 2020

1.10 Local authority data shows that some accommodation need has been addressed by granting planning permissions for new pitches since the 2020 GTAA was undertaken. As Table 2 below shows, planning permission for a further 5 pitches on an existing site in West Lindsey has been granted, resulting in the PPTS 2015 accommodation needs arising in this local authority being met for the first five-year period.

Table 2: Planning permissions since GTAA		
Planning Reference	Number of Pitches	Date Granted
140684	5	22/05/2020

Source: Internal 2021

1.11 This means that Central Lincolnshire local authorities have met the PPTS 2015 accommodation needs for the first 5-year period of 2019-2024. As Central Lincolnshire is seeking to address Gypsies and Travellers accommodation need across Central Lincolnshire rather than on a Local Plan Authority basis, this results in a surplus of 9 pitches. It also means that Central Lincolnshire has also met the needs of the 5 identified in the first five years based on Ethnic identity (thus including those who do not meet the PPTS 2015 definition). The figure in brackets illustrate the implications of the surplus in the first five years.

Table 3: Summary of accommodation needs 2019-40 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
Total 2019-24	0	-9 (0)
Total 2024-29	10	10 (1)
Total 2029-34	11	11 (11)
Total 2034-40	15	15 (15)
Total 2019-40	36	27 (27)

Source: Internal 2021

Addressing accommodation need

Safeguarding existing sites

1.12 It is important for the Central Lincolnshire local authorities to consider safeguarding existing Gypsy, Traveller, and Travelling Showpeople sites and yards. This means that sites and yards with permanent planning permission cannot be developed for alternative use unless it can be demonstrated that they are no longer required to meet identified need.

1.13 One implication of safeguarding sites and yards is that households can be confident that their right to remain on the sites is protected and that the sites cannot be

redeveloped for different use. The implementation of this policy would ensure that existing and future Gypsy and Traveller sites remain as such and are not lost to alternative development.

1.14 Not safeguarding sites could potentially lead to the loss of Gypsy and Traveller sites for alternative uses where there is still an identified need. This would have an adverse effect on the supply of pitches and the ability of the Central Lincolnshire local authorities to meet accommodation needs as discussed above. This has already been the case for a number of sites in the local area.

1.15 A number of local authorities have already implemented a safeguarding of Gypsy and Traveller sites policy including South Oxfordshire District Council. According to the council's Local Plan Second Preferred Options Consultation Report (September 2017) only authorised, permanent sites will be safeguarded i.e. not unauthorised sites or those with temporary planning permission.

1.16 Policy H14 of South Oxfordshire's Local Plan 2034 'Safeguarding Gypsy, Traveller and Travelling Showpeople sites' states that:

1. Proposals that result in the loss of an authorised and permanent site for residential use by Gypsies, Travellers and Travelling Showpeople will not be permitted unless:
 - i. suitable alternative provision is made for the use on a site with equal access to services; or
 - ii. it has been determined that the site is no longer needed for this use.
2. Appropriate, detailed and robust evidence will be required to satisfy the above criteria. The Council will require the independent assessment of this evidence.
3. Planning conditions or legal obligations may be necessary to ensure that any replacement sites are provided. Any replacement site should be available before the original site is lost.

1.17 Similarly, Policy CS17 of Gravesham Borough Council's Local Plan states that it will safeguard Gypsy and Traveller sites with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet

identified need. Also, it will support new sites within the urban area and rural settlements inset from the Green Belt which accord with Local Plan policies.

- 1.18 Finally, Policy HOUS17 of Ashford Borough Council's Local Plan states that existing permanent authorised Gypsy and Traveller sites and sites for Travelling Showpeople shall be retained for the accommodation of Gypsies and Travellers and for Travelling Showpeople as defined in the relevant national planning policy document. Any new sites granted permanent planning permission shall also be safeguarded under the provisions of this policy. This policy may not apply if the site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed in policy HOU16 ('Traveller Accommodation'). However, the Local Plan also states that sites which have been granted personal permission i.e. inhabited by a named family, will not be safeguarded under this policy.
- 1.19 Considering the above it is clear that there are advantages and disadvantages in relation to the Central Lincolnshire local authorities safeguarding current Gypsy and Traveller sites. The main advantage is that existing and future Gypsy and Traveller sites remain as such and are not lost to alternative development. The main disadvantage is that, whilst current sites could be safeguarded, expanding sites located in areas may contravene Local Plan policies regarding sustainability i.e. whilst current sites can be safeguarded the same principle cannot be applied to the expansion of sites where landscape restrictions apply.
- 1.20 As such, we recommend that the Central Lincolnshire local authorities adopt a safeguarding policy for all current permanent, authorised Gypsy and Traveller sites. This would include safeguarding both current sites and sites which may become intensified in the future. However, there is a caveat that this cannot be applied to expanding sites located in areas with landscape restrictions.

Regularisation of unauthorised developments

- 1.21 There is one site located in West Lindsey which is listed in the 2020 GTAA as an unauthorised development. Should the site be granted planning permission, it would result in 2 pitches being added to accommodation supply and subsequently removed from accommodation need.

Table 4: Summary of accommodation needs 2019-40 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
Total 2019-24	-2 (0)	-11 (0)
Total 2024-29	10 (8)	10 (0)
Total 2029-34	11 (11)	11 (10)
Total 2034-40	15 (15)	15 (15)
Total 2019-40	34 (34)	25 (25)

Source: Internal 2021

Intensification and/or expansion of existing sites

- 1.22 Some existing sites within Central Lincolnshire have sufficient space to accommodate additional pitches to meet the occupying household's additional accommodation needs. Whilst it is acknowledged that planning constraints may apply (which is for the local authorities to consider), it is regarded by the households who own private sites as the best way forward for them, the local communities, and the local authorities. This has already proven to be an effective way of meeting need in the area, as the 5 pitches already granted were achieved through this method, and with the respective local authority (West Lindsey) working closely with the family (assisted by *RRR Consultancy*).
- 1.23 The owner of a site in West Lindsey has confirmed that they will be applying for 4 additional pitches within the first five years of the plan. If successful, this would result in a further reduction in need as follows:

Table 5: Summary of accommodation needs 2019-40 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
Total 2019-24	-6 (0)	-15 (0)
Total 2024-29	10 (4)	10 (0)
Total 2029-34	11 (11)	11 (6)
Total 2034-40	15 (15)	15 (15)
Total 2019-40	30 (30)	21 (21)

Source: Internal 2021

- 1.24 Due to covid 19 restrictions, it has not been possible to visit the sites or complete the relevant consultation with the respective site owners, in particular, the completion of the necessary paperwork confirming their intention to submit a planning application. However, as the following table illustrates, through consultation that has been possible, both during the 2020 GTAA for this ongoing work, there are clear intentions to apply for additional pitches on the respective sites within the Local Plan period. These additional pitches could potentially result in all need for this period being met.

Table 6: Meeting accommodation need via new provision	
Site	No. of Pitches
A (North Kesteven)	2
B (North Kesteven)	2
C (West Lindsey)	4
D (West Lindsey)	1
E (West Lindsey)	2
F (West Lindsey)	10
Total Additional Supply	21

Source: Internal 2021

Table 7: Summary of meeting accommodation need via new provision	
Method	No. of Pitches
Intensification on 2 sites in North Kesteven	4
Intensification on 4 sites in West Lindsey	17
Total Additional Supply	21

Source: Internal 2021

Using local authority owned land

- 1.25 The following demonstrates how, if the preferred method in meeting accommodation need (engaging with the community) does not address all of the identified need, it is recommended that Central Lincolnshire consider some of its own land as potential. This is only recommended after every attempt has been made via working with the families in meeting the identified accommodation need.
- 1.26 The following images illustrate how existing local authority sites and adjoining land could potentially accommodate additional need.

Lincoln

- 1.27 Due to the number of vacant pitches the 2020 GTAA identified no additional need in Lincoln for the period 2019-2024. However, the existing site would benefit from improvements, and could accommodate additional pitches to meet the accommodation needs of households from throughout the study area. This would include households related to current occupants who are reluctant to move onto the site due poor conditions. There is potential for land to both accommodate additional pitches and be used to improve facilities. The new pitches could be used to help meet accommodation need deriving from throughout the Central Lincolnshire area.
- 1.28 Subject to any site-specific constraints this site could be expanded to 19 pitches, an increase of 6 pitches.

1.29 The *Google Maps* image below shows how the Lincoln local authority site could be developed to accommodate additional pitches.

Current Provision



Source: Google Maps 2021

Potential Revised provision



Source: Google Maps 2021

West Lindsey

1.30 The *Google Maps* image below demonstrates the potential of the site to accommodate additional pitches. It is important to acknowledge health and safety issues including the possible requirement of removing land potentially contaminated due to previous use. The land is also situated in a flood risk area although risks could potentially be

mitigated by applying the same environmental conditions to any expansion as met by the current site. Despite constraints it is apparent that the local authority land has potential to meet the accommodation needs of local households. This area would benefit from some attention in relation to removal and reformatting the area as a whole which would result in an improved location, which would potentially result in an area that is easier to maintain.

Current Provision



Source: Google Maps 2021

Potential provision



Source: Google Maps 2021

Overview of meeting accommodation need

- 1.31 Since the 2020 GTAA was completed planning permission has been granted for an additional 5 pitches on an existing site in West Lindsey. This was through the planning application process and by working with the households with accommodation need to identify how this can be met. There is no requirement for the Central Lincolnshire local authorities to identify land supply for the first 5-year period as accommodation need has already been met.
- 1.32 Whilst clearly the location of sites is relevant, Central Lincolnshire are seeking to address Gypsy, Traveller and Travelling Showpeople need across Central Lincolnshire rather than on an LPA basis. As demonstrated above, there are two key ways in meeting the identified accommodation need. It is recommended that Central Lincolnshire, collectively, focuses on meeting its need via a policy protocol which will enable them to address the need via engaging with the communities. It could also include what could be regarded as backup plan, and that is, if after every attempt is made and this is not successful, then the council can call on identified land on and adjoining their existing local authority sites to address any outstanding need.

Table 8: Meeting accommodation need via new provision	
Method	No. of Pitches
Changes to the number of pitches since the 2020 GTAA	5
Intensification of existing sites	25 *
Authorisation of Unauthorised Development	2
Total Additional Supply	32

Source: Internal 2021

(*including the 4 in West Lindsey)

Table 9: Meeting accommodation need via Local Authority Land	
Method	No. of Pitches
Changes since GTAA	5
LA land as potential land supply Lincoln	6
LA land as potential land supply West Lindsey	21
Total Additional Supply	32

Source: Internal 2021

Summary

- 1.33 Whilst the 2020 Central Lincolnshire GTAA provided two need figures, this report focuses on identifying land to meet the PPTS 2015 requirements. It recommends that the Central Lincolnshire Local Plan should seek to meet the PPTS need (as required).

The 2020 GTAA identified no additional accommodation need for additional Travelling Showpeople plots.

- 1.34 The 2020 GTAA identified 4 sites in West Lindsey and 2 in North Kesteven with accommodation need. The site owners intend to apply for planning permission for additional pitches on respective sites within the first 5-year period of the Central Lincolnshire Local Plan. As part of this work, *RRR Consultancy* are working with the households to assist in this process alongside the local authorities. The aim is to have these formalised as land supply prior to the Local Plan Examination. This could potentially result in 24 additional pitches. As the above has demonstrated, there has already been meaningful progress in delivering sites through this engagement process with the community and in meeting some of the identified need.

- 1.35 There is also local authority land located in both West Lindsey and Lincoln City adjoining or close to respective local authority sites that has potential in addressing the identified accommodation need. The Lincoln site could potentially be altered to enable the site layout and size of each pitch to be revised and for additional pitches to be developed. This could result in a potential land supply for an additional 6 pitches. In West Lindsey, there is scope for land adjoining the existing local authority site to serve as potential land supply to meet accommodation need. However, this option should only be considered if accommodation need is not met through the intensification and expansion of existing sites, and/or the development of new site(s).