Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 2
The Suffolk Coastal Spatial Strategy
B - Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers

August 2019
www.eastsuffolk.gov.uk/localplanexamination

Source – www.thesuffolkcoast.co.uk
Contents

**Question 2.10** Having regard to the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (D17) has the need for additional pitches, plots and moorings been robustly calculated? .................................................................................................................................................. 1

**Question 2.11** Having regard to the ANA and the Councils response to my initial questions, should the Plan set targets for the provision of pitches, plots and/or moorings? What is the present position in respect of the planning status of the unauthorised ‘New Traveller’ sites which are indicated to be a significant component of the identified need in the Councils response to my initial questions? .................................................................................................................................. 4

**Question 2.12** To be positively prepared, is it necessary for the Plan to make provision for the identified need for additional pitches and/or plots through a site allocation(s)? ...................... 7

**Question 2.13** How would the needs of the wider community who reside in caravans including people who are no longer classified as gypsies, travellers or travelling showpeople be identified and addressed by the Plan? ........................................................................................................ 9

**Question 2.14** Is there sufficient capacity within the identified areas shown on the Policies Map (Policy SCLP5.15) to meet the identified need for additional moorings? ......................... 10

**Question 2.15** Will a five year supply of specific developable sites for gypsies, travellers, travelling showpeople and boat dwellers be provided on adoption of the plan together with a supply of specific, developable sites for years 6 to 10? How would any shortfall be addressed? ........................................................................................................................................... 11

**Question 2.16** Is Policy SCLP5.17 justified and consistent with National Policy? ....................... 11

**Suggested Modifications** ...................................................................................................................................................... 13
Question 2.10

Having regard to the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (D17) has the need for additional pitches, plots and moorings been robustly calculated?

1. The need for additional pitches, plots and moorings has been subject to a robust assessment through the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (Document 17).

2. Planning Policy for Traveller Sites, which is relevant to the assessment of the needs for pitches and plots for Gypsies and Travellers, (Document H15) states that:

   ‘In assembling the evidence base necessary to support their planning approach, local planning authorities should:
   
   a) Pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups)

   b) Cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities

   c) Use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.’

3. In relation to the needs for moorings, the Draft Guidance to Local Housing Authorities for the Periodical Review of Housing Needs – Caravans and Houseboats (Document H25) states that authorities should use approaches of direct engagement, existing data sources and specialist surveys to identify the needs.

4. The ANA was commissioned jointly to cover the areas of Babergh District, Ipswich Borough, Mid Suffolk District, and the former Suffolk Coastal and Waveney Districts. Paragraphs 1.1 and 1.2 (page 8) of the ANA explains that the purpose of the assessment was to quantify the accommodation and housing related support needs of Gypsies, Travellers, Travelling Showpeople and Boat Dwellers to be used as an evidence base to inform planning policy. The assessment has therefore been carried out within the context of this overall objective. Paragraphs 1.4 – 1.5 (pages 8 and 9) of the ANA summarise the methodology that has been
followed and this is explained in further detail in the subsequent chapters. The methodology involved a review of secondary information, direct contact with key stakeholders and extensive face to face surveys with Gypsy and Traveller households and postal and face to face surveys of boat dwellers. The Norfolk and Suffolk Gypsy and Traveller Liaison service were closely involved in the production of the ANA.

5. Chapter 4 of the ANA explains the extensive liaison that was undertaken with stakeholders throughout the production of the ANA, including through a focus groups and direct contact with organisations. This approach enabled specific themes and issues to be identified in relation to the type of sites needed, travelling patterns, barriers to provision and issues around communication. This qualitative element of the assessment has helped to inform the conclusions of the assessment, when considered alongside the quantitative assessment.

6. Direct contact was made with households, through the use of surveys conducted via face to face contact, as explained in Chapter 5 of the ANA, to inform the needs for permanent pitches for Gypsies and Travellers and plots for Travelling Showpeople. The Councils provided details of the existing Gypsy and Traveller sites to the consultants. Paragraph 5.2 of the ANA explains that the surveys were conducted at a time of year when families were most likely to be present on the sites. Paragraph 5.3 explains that by visiting the Gypsy and Traveller sites this enabled the consultants to clarify the status of pitches as well as to conduct the surveys. The surveys also identified whether or not those surveyed would meet with the definition of Gypsy and Traveller as set out in the Glossary to Planning Policy for Traveller Sites (Document H15). A high response rate (86%) was yielded in relation to the surveys.

7. The need identified for permanent pitches for Gypsies and Travellers in the Suffolk Coastal area is based largely upon the unauthorised status of two sites which currently accommodate those meeting the definition of Gypsies and Travellers. A further future need for pitches was identified from the survey data in relation to 2 new family formations which are expected to arise over the period 2016 – 2021 in the Suffolk Coastal area. The methodology for identifying the 2016 – 2021 future need is set out in paragraphs 6.17 – 6.25 of the ANA (pages 71-72). The needs from 2021 – 2036 have been based upon consideration of local Gypsy and Traveller population characteristics as determined by the household surveys as stated in paragraphs 6.28 – 6.29 of the ANA (page 73). The calculation for the Suffolk Coastal area is set out in Appendix 1 of the ANA on page 120.

8. The need identified for plots for travelling showpeople in the Suffolk Coastal area relates to the potential future needs of the existing plots. Future needs for plots have been identified through the surveys, as set out in paragraphs 8.11 – 8.16 of the ANA, and for Suffolk Coastal relate to family units seeking a plot in the area (1 plot) and new family formations arising from existing family units (1 plot). The calculation for the Suffolk Coastal area is set out in Appendix 1 of the ANA on page 125.
9. Needs for short stay stopping sites (also referred to as transit sites) have been informed by the contact made with organisations through the focus group and telephone calls, and also by a review of the locations and number of unauthorised encampments which had taken place in recent years. Data on unauthorised encampments is set out in paragraph 3.21 and Table 3.4 of the ANA (pages 33-34). Prior to the undertaking of the ANA it had been agreed by authorities in Suffolk that 3 short stay stopping sites would be developed in Suffolk and stakeholders consider that this approach would remain relevant to address the need that they had been experiencing (as explained in paragraph 4.21 of the ANA). Due to the nature of the need for short stay stopping sites, in that this relates to needs for accommodation linked to patterns of movement, it is appropriate that the need is identified and planned for at the strategic scale and therefore figures have not been identified for individual authorities.

10. The need for moorings has been identified through the use of postal surveys. Existing moorings were identified through direct contact with boat yards and through searches of Council Tax registers. The assessment used the same considerations as to what may constitute future need as for the Gypsy and Traveller surveys. In relation to Suffolk Coastal the assessment identified that there are currently 16 occupied permanent residential moorings and that over the period 2016 – 2021 there is a need for 15 new moorings based on families seeking moorings in the area, new family formations expecting to arise and need related to waiting lists (as set out in Appendix B, page 130 of the ANA). The needs from 2021 – 2036 have been based upon consideration of national annual average family growth rates and the applicability of these rates to the study area, as set out in paragraph 10.20 of the ANA (page 106).

11. For each of the areas of need above, engagement with relevant parties has informed a quantitative assessment which follows a set of key steps which consider the various elements which may constitute future need. The conclusions of the ANA, as set out in Chapter 11, reflect the qualitative and quantitative nature of the assessment as described above. The Council therefore concludes that the approach to identifying needs is consistent with Planning Policy for Traveller Sites (Document H15) and Draft Guidance to Local Authorities on the Periodical Review of Housing Needs - Caravans and Houseboats (Document H25) on providing a robust assessment of needs through engagement with travellers and representative organisations.
Question 2.11

Having regard to the ANA and the Council’s response to my initial questions, should the Plan set targets for the provision of pitches, plots and/or moorings? What is the present position in respect of the planning status of the unauthorised ‘New Traveller’ sites which are indicated to be a significant component of the identified need in the Council’s response to my initial questions?

12. The Council’s response to the Inspector’s initial questions (Document H4, Question 5, pages 8-15) referred to Paragraph 9 of Planning Policy for Traveller Sites (Document H15) which states that ‘Local planning authorities should set pitch targets for Gypsies and Travellers as defined in Annex 1 and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.’

13. The needs that have been identified for permanent pitches for Gypsies and Travellers, plots for Travelling Showpeople and for Short Stay Stopping Sites, as identified through the Accommodation Needs Assessment (Document D17), are explained in Council Response to Inspector Questions – H2 (20/05/19) (Document H4) and are set out below for clarity:

**Accommodation needs for permanent pitches for Gypsies and Travellers**

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent pitches</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>15</td>
</tr>
</tbody>
</table>

**Table 3: Accommodation needs for Travelling Showpeople**

<table>
<thead>
<tr>
<th></th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travelling Showpeople plots</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
</tbody>
</table>

14. The need for short stay stopping sites is for 2 to 3 sites across the study area over the period 2016 - 2036 (which is the area comprising the former Suffolk Coastal District, Babergh District, Mid Suffolk District, Ipswich Borough and the former Waveney District).
15. In its response to the initial Inspector Questions (Document H4) the Council set out potential modifications to Policy SCLP5.17 and the associated supporting text. The Council would agree that these requirements could be incorporated within Policy SCLP5.17 and therefore sets out suggested modifications below to this effect. These modifications are as per the potential modifications contained in the Council’s earlier response set out in Document H4.

Paragraph 5.90:

“The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (2017) identifies Suffolk Coastal as ‘unique’ in the eastern region in that it has a relatively stable population of New Age Travellers and concludes that there is a need for 15 permanent Gypsy and Traveller pitches\(^1\) over the period 2016 – 2036. The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area. This need relates largely to the unauthorised nature of sites on which the existing population of New Travellers reside. The need over the period 2016 – 2036 is set out below.

\[
\begin{array}{|c|c|c|c|c|c|}
\hline
 & Existing provision (2016) & Additional need 2016 - 2021 & Additional need 2021 - 2026 & Additional need 2026 - 2031 & Additional need 2031 - 2036 & Total additional need 2016 - 2036 \\
\hline
Permanent pitches & 0 & 12 & 1 & 1 & 1 & 15 \\
\hline
\end{array}
\]

Insert new paragraph after paragraph 5.90 (including last sentence of 5.90):

“The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area. The Council is working with other authorities across Suffolk to deliver the need for short stay stopping sites, as set out in the East Suffolk Private Sector Housing Strategy (2019 – 2023).”

“5.91 The District also has one, long-established Travelling Showpersons site. The Accommodation Needs Assessment identifies a need for 4 2 plots for Travelling Showpeople in Suffolk Coastal over the period 2016 - 2036. The need over the period 2016 – 2036 is set out below.”

\[
\begin{array}{|c|c|c|c|c|c|}
\hline
 & Existing provision (2016) & Additional need 2016 - 2021 & Additional need 2021 - 2026 & Additional need 2026 - 2031 & Additional need 2031 - 2036 & Total additional need 2016 - 2036 \\
\hline
Travelling Showpeople & 2 & 2 & 0 & 0 & 0 & 2 \\
\hline
\end{array}
\]

\(^1\) Area on a site developed for a family unit to live
Policy SCLP5.17:

“The Council will support the provision of permanent sites for Gypsies and Travellers and Travelling Showpeople, to meet the needs identified through the 2017 Accommodation Needs Assessment as set out below:

a) Provision of 15 pitches to meet the needs for permanent accommodation for Gypsies and Travellers;

b) Provision of 2 plots to meet the needs for Travelling Showpeople.

The Council will work with other Councils across Suffolk to deliver identified needs for short stay stopping sites, including the delivery of one short stay stopping site within East Suffolk.

Sites for Gypsies and Travellers and Travelling Showpeople will be permitted where:

a) The proposed occupants meet the definition of ‘Gypsies and Travellers’ or ‘Travelling showpeople’ as set out in ‘Planning Policy for Traveller Sites’ (2015) (or subsequent revisions);

b) The site is within, adjacent to or well related to a Major Centre, Town, Large Village or Small Village. Where the requirement for a site is linked to the education or health needs of the occupants the site must be well related to locations where these services are provided;

c) The site is capable of being provided with mains water and adequate sewage/waste disposal provision (including the storage of waste prior to disposal);

d) The site is acceptable in terms of highway safety;

e) The site is designed so as to minimise visual impact on the surrounding area and landscape character, and does not dominate the nearest settled community;

f) The site is not located in flood zone 2 or flood zone 3;

g) Any industrial, retail, commercial, or commercial storage activities to take place on the site must be ancillary to the primary use of the site for residential purposes and must not harm the amenity of occupants of the site or surrounding areas;

h) The scale and range of uses proposed within the site are acceptable in terms of their impact on any existing neighbouring uses; and
Matter 2: The Suffolk Coastal Spatial Strategy – B Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers

i) Where it is intended that a site should be self managed by the occupants, the capacity of the site should not normally exceed 8 pitches.

Where the proposal is for a Travelling Showpersons site (or extension to an existing site) sufficient space for storage of vehicles and equipment will be provided.

Neighbourhood Plans may allocate sites for Gypsy and Traveller use.”

16. In relation to moorings, the ANA (Document 17) demonstrates a need for 17 additional moorings across the Suffolk Coastal area over the course of the Local Plan. The Council is supporting this approach through identifying existing areas of residential moorings across the District where such a need could be supported relative to any potential harm caused to protected areas. There is no requirement in planning policy to set a requirement in relation to the needs for moorings and due to the environmental sensitivities relating to the locations where moorings would be supported, it is appropriate that the needs are included for reference in the supporting text as per paragraph 5.77 of the Final Draft Local Plan.

17. In relation to the New Traveller sites, the present planning status is that these are unauthorised. Paragraph 2.21 of the Accommodation Needs Assessment (Document D17) refers to the situation as described in the current adopted Core Strategy and Development Management Policies (2013) (Document F1, page 34), which acknowledges that the groups of New Travellers have existed in Suffolk Coastal for 20 years or so and that this is a lifestyle choice. The sites are visited routinely as part of the Council’s responsibility to undertake half yearly caravan counts. Recently there has been some reduction in numbers of permanently occupied pitches on the established sites but it is too early to say if this is a downwards trend.

18. Should there be sufficient evidence to demonstrate that lawful use has been established on the sites, the Council could look to regularise the planning position, however there has not been a need to date to progress this route with the occupants of the sites.

Question 2.12

To be positively prepared, is it necessary for the Plan to make provision for the identified need for additional pitches and/or plots through a site allocation(s)?

19. As stated in the Council Response to Inspector Questions – H2 (20/05/19) (Document H4, page 10) whilst there is a need for 12 pitches in the first five years of the period covered by the Accommodation Needs Assessment, it is necessary to consider this in light of the characteristics of that need. The Accommodation Needs Assessment (Document D17, paragraph 2.21) refers to the situation as described in the current adopted Core Strategy and Development Management Policies (2013) (Document F1, page 34), which acknowledges that the groups of New Travellers have existed in Suffolk Coastal for 20 years or so and that this is a lifestyle choice. Paragraph 11.19 of the Accommodation
Needs Assessment recognises that the need could be met through options other than the provision of an alternative site or sites, through for example authorising unauthorised development.

20. The Council undertook a ‘call for sites’ exercise in 2016, as explained in the Strategic Housing and Economic Land Availability Assessment (Document D10, page 5 and Appendix A). Whilst ‘Gypsy and Traveller pitch’ was included as an option in the list of uses for which sites could be submitted, no sites have been submitted for Gypsy and Traveller use through the ‘call for sites’ or through subsequent consultations undertaken as part of the production of the Local Plan.

21. Due to the nature of use of the sites by New Travellers, there may be more appropriate options open to the Council, should the need arise, other than allocating a site elsewhere. As stated above in response to Question 2.11, should the Council consider that there may be sufficient evidence to demonstrate that lawful use has been established on the sites, the Council would (through its Housing service and with liaison with the Norfolk and Suffolk Gypsy and Traveller Liaison Service) be able to provide assistance to the occupants in this respect should this be necessary to secure future occupation. The occupants would also have access to the Council’s Housing Needs service which would be able to provide advice on securing alternative accommodation if this was desired or required by the occupants.

22. In light of the circumstances surrounding the current population of New Travellers and the need identified, it would not be appropriate for the Council to seek to meet the need described above through the provision of a site allocation or allocations for permanent Gypsy and Traveller pitches in the Local Plan. Alongside the potential for the Council to work with the occupants and owners of the sites should the need arise, Policy SCLP5.17 (including the modifications set out under Q2.11 above) provides a framework for the consideration of any planning application for an alternative site or site(s) should this be necessary, and the Plan is therefore positively prepared in this respect.

23. In terms of plots for Travelling Showpeople, as explained in the Council Response to Inspector Questions – H2 (20/05/19) (Document H4), the Accommodation Needs Assessment (Document D17, page 80, paragraph 7.15) identifies that there is one authorised Travelling Showpeople yard in Suffolk Coastal which consists of 2 plots occupied by an extended family. Appendix A of the Accommodation Needs Assessment identifies that the need relates to family units seeking residential plots in the area and to new family formations expected to arise from within existing family units.

24. The Council’s approach to providing for this need is to provide a policy framework which would support new provision where this meets with the criteria set out in the Policy. This is consistent with paragraph 11.17 of the Accommodation Needs Assessment which suggests that the need could be met by increasing provision on the existing site. Policy
Suffolk Coastal Local Plan Examination | Hearing Statement by East Suffolk Council

Matter 2: The Suffolk Coastal Spatial Strategy – B Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers

25. The Council Response to Inspector Questions – H2 (20/05/19) (Document H4) also explains the position in relation to provision for short stay stopping sites. The Councils across Suffolk have established an agreed way of working in order to bring forward short stay stopping sites to meet the need identified. This is explained in the Council’s Local Development Scheme (Document E1) (paragraphs 26 – 29, pages 5&6). This agreed way of working across Suffolk has been progressing, and in 2019 a Special Projects Officer – Gypsies and Travellers has been appointed to take forward the work of delivering three sites across Suffolk. This position is reflected in the Council’s Private Sector Housing Strategy (2019 – 2023) (Document H13, page 8) which states that the Councils across Suffolk have jointly funded a post to deliver a solution to the need for short term transit sites in the County. The Private Sector Housing Strategy sets a specific action for the identification of a short stay stopping site within East Suffolk for operation by 2021 and states that a small number of possible sites have been identified and that work is underway on progressing feasibility studies (pages 24 - 25).

26. The Private Sector Housing Strategy relates to the full East Suffolk Council area, and therefore the appropriate site may be outside of the area covered by the Suffolk Coastal Local Plan.

27. In light of the above agreed approach to address the needs for short stay stopping sites, it would not be appropriate for the Local Plan to allocate sites to meet this need. Policy SCLP5.17 in the Final Draft Local Plan (Document A1) therefore provides a framework for the consideration of any planning applications which is consistent with the criteria set out in Paragraph 13 of Planning Policy for Traveller Sites, and along with the inclusion of the modification as set out under Q2.11 provides a positive approach towards meeting this need. The plan is therefore positively prepared in this respect.

28. The Accommodation Needs Assessment (D17) sought to distinguish between those who meet the definition of the Gypsy, Traveller or Travelling Showpeople as set out in Annex 1: Glossary of the Planning Policy for Traveller Sites (Document H15), and those residing in caravans who do not. The Accommodation Needs Assessment (Document D17, paragraph 5.25) states that...
none of the respondents and families who have permanently stopped travelling are requiring alternative accommodation or have any hidden or future need, and therefore their status does not impact on the calculations.

29. Nevertheless, in acknowledgement of the potential for the need for caravans for residential use over the plan period, the Council has included Policy SCLP5.16 within the Plan that would provide a framework for the consideration of planning applications for such uses.

**Question 2.14**

Is there sufficient capacity within the identified areas shown on the Policies Map (Policy SCLP5.15) to meet the identified need for additional moorings?

30. Existing moorings across the District are predominantly located along the River Deben which includes a number of European and nationally protected areas. As such, any future provision of additional moorings along the River Deben would be limited due to environmental constraints. Notwithstanding this, the Council has identified areas of existing moorings where additional moorings could be provided, and it is considered that there is scope within these identified areas to accommodate the need for additional moorings.

31. The identified moorings in the Policies Map in the Final Draft Local Plan (Document A1, pages 651 – 654) includes the existing boat yards with residential moorings, as referred to in the Accommodation Needs Assessment (Document D17), which are considered by the Assessment to be at capacity. The Assessment outlines that boat yard owners may wish to increase the number of residential moorings allowed on their yard, and that some boat yard owners with no residential moorings might consider having some (paragraph 11.29). Indeed, the Assessment states that one boat yard owner in Suffolk Coastal is considering expanding to include more spaces for permanent residential moorings (paragraph 9.22). Although, no recent planning applications have been submitted seeking to expand a boatyard for the purposes of permanent residential moorings.

32. The Council has made a judgement in identifying areas of existing moorings through identifying existing areas of houseboat activity and considering these alongside environmental sensitivities in these areas. Although some of the areas are considered to be at capacity, there are local indications that there is potential for additional moorings to be provided. As such, it is generally considered that there is capacity within Martlesham Creek (Document A1, page 652) and Woodbridge (Document A1, page 654) for additional moorings. In light of this and the above; it is considered that there is capacity within the identified areas shown on the Policies Map to meet the needs for additional moorings.

33. This should be viewed within the context that the Accommodation Needs Assessment (Document D17, page 99, paragraph 9.24) refers to need as relating to lifestyle choice as well
as need, and this needs to be carefully balanced against protecting the nationally and internationally protected environmental assets on the estuaries.

**Question 2.15**

*Will a five year supply of specific developable sites for gypsies, travellers, travelling showpeople and boat dwellers be provided on adoption of the plan together with a supply of specific, developable sites for years 6 to 10? How would any shortfall be addressed?*

34. The circumstances surrounding the identified need in the Suffolk Coastal area are explained in response to questions 2.11 – 2.14 above. As explained in response to question 2.12 it is not considered appropriate to allocate sites to meet the numerical need for pitches and plots, as this would not address the qualitative needs which are specific to the circumstances of Suffolk Coastal. In relation to moorings, the Council has set out a location based approach to direct future needs to areas where there are currently moorings in view of the environmental sensitivities of the estuaries. The Council therefore considers that the approach taken is justified in terms of the circumstances of the Suffolk Coastal area and that the Plan is positively prepared through the inclusion of Policy SCLP5.17 (with modifications as outlined in response to question 2.11) which provides a framework for the consideration of planning applications. This approach needs to be viewed within the wider context of the approach of the Council in relation to support that can be provided to Gypsies and Travellers, particularly through its Housing service when needed, and the work with other Councils in Suffolk to identify short stay stopping sites, as set out in response to question 2.12. This provides a more appropriate outcome than the allocation of sites through the Local Plan.

**Question 2.16**

*Is Policy SCLP5.17 justified and consistent with National Policy?*

35. Policy SCLP5.17, including the modifications identified under the Council’s response to Question 2.11 above, provides an appropriate strategy for addressing the needs of Gypsies and Travellers. In response to Question 2.11 above, the Council has explained that to address the specific circumstances of the need in the Suffolk Coastal area it is appropriate for the Local Plan to set out a criteria based policy against which planning applications can be determined should they come forward. As explained in response to Question 2.15, this approach is to be viewed within the wider context of the approach of the Council in relation to support that can be provided to Gypsies and Travellers, particularly through its Housing service when needed, and the work with other Councils in Suffolk to identify short stay stopping sites.

36. Policy SCLP5.17 is therefore justified.
37. Policy SCLP5.17 is consistent with national policy contained in Planning Policy for Traveller Sites (Document H15). The modifications identified under the Council’s response to Question 2.11 would provide additional clarity in relation to Paragraph 9 of Planning Policy for Traveller Sites by identifying the quantified needs within the policy.

38. The criteria set out within Policy SCLP5.17 reflect the policy contained in Planning Policy for Traveller Sites. Criterion a) ensures that the Policy is effective in addressing the needs of those who meet the definition set out in Annex 1 of Planning Policy for Traveller Sites. The criteria in the Policy take forward the social and environmental objectives of Paragraphs 10 and 13 of Planning Policy for Traveller Sites. The criteria in the Policy, collectively, would ensure that any new sites would support the objective of promoting peaceful and integrated co-existence between the site and the local community, would reduce the need to travel and promote access to services and protect local amenity and the environment.

39. Policy SCLP5.17 is consistent with national policy on flood risk as set out in paragraph 155 of the National Planning Policy Framework. The Planning Practice Guidance (Paragraph: 066 Reference ID: 7-066-20140306) identifies caravans as being highly vulnerable and should therefore be avoided in flood zone 3 and only permitted where the exception test is passed in flood zone 2. Paragraph 13 of Planning Policy for Traveller Sites (Document H15) states that planning authorities should ensure that their policies do not locate sites in areas of high risk flooding due to the vulnerability of caravans, and therefore the policy is consistent with this approach.

40. Criterion l) sets out policy in relation to the scale of sites, which is reflective of the Accommodation Needs Assessment (Document D17, page 67, paragraph 5.47), and is therefore consistent with Paragraph 7 of Planning Policy for Traveller Sites which sets out an evidence based approach to planning for Gypsies and Travellers.

41. Policy SCLP5.17 is therefore consistent with national policy.
### Matter 2: The Suffolk Coastal Spatial Strategy – B Provision for Gypsies, Travellers and Travelling Showpeople and Boat Dwellers

#### Suggested Modifications

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph No. / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2B.1</td>
<td>Paragraph 5.90 (MIQ2.11)</td>
<td>Amend paragraph 5.90 to read: “The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (2017) identifies Suffolk Coastal as ‘unique’ in the eastern region in that it has a relatively stable population of New Age Travellers and concludes that there is a need for 15 permanent Gypsy and Traveller pitches over the period 2016 – 2036. The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area. This need relates largely to the unauthorised nature of sites on which the existing population of New Travellers reside. The need over the period 2016 – 2036 is set out below.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>To provide further clarity over requirements.</td>
<td>N/A</td>
</tr>
<tr>
<td>2B.2</td>
<td>After paragraph 5.90 (MIQ2.11)</td>
<td>Insert the following as a new paragraph after 5.90 (including last sentence of 5.90) to read: “The Accommodation Needs Assessment also concludes that there is a need for 2 to 3 short stay stopping sites across the study area. The Council is working with other authorities across Suffolk to deliver the need for short stay stopping sites, as set out in the East Suffolk Private Sector Housing Strategy (2019 – 2023).”</td>
<td>To clarify the current position in relation to short stay</td>
<td>N/A</td>
</tr>
</tbody>
</table>

#### Related Representation

<table>
<thead>
<tr>
<th>Change</th>
<th>Related Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>42 Area on a site developed for a family unit to live“</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permanent pitches</th>
<th>Existing provision (2016)</th>
<th>Additional need 2016 - 2021</th>
<th>Additional need 2021 - 2026</th>
<th>Additional need 2026 - 2031</th>
<th>Additional need 2031 - 2036</th>
<th>Total additional need 2016 - 2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>15</td>
</tr>
<tr>
<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
<td>Reason</td>
<td>Related Representation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------</td>
<td>-------------------</td>
<td>--------</td>
<td>--------</td>
<td>-------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>28.3</td>
<td>Paragraph 5.91 (MIQ2.11)</td>
<td>Amend paragraph 5.91 to read as follows and include a new table: “The District also has one, long-established Travelling Showpersons site. The Accommodation Needs Assessment identifies a need for 4 plots for Travelling Showpeople in Suffolk Coastal over the period 2016 - 2036. The need over the period 2016 – 2036 is set out below.”</td>
<td>To provide further clarity over requirements.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td><img src="image" alt="Table" /></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>28.4</td>
<td>Policy SCLP5.17 (MIQ2.11)</td>
<td>Add the following text to the start of Policy SCLP5.17 to read: “The Council will support the provision of permanent sites for Gypsies and Travellers and Travelling Showpeople, to meet the needs identified through the 2017 Accommodation Needs Assessment as set out below: a) Provision of 15 pitches to meet the needs for permanent accommodation for Gypsies and Travellers; b) Provision of 2 plots to meet the needs for Travelling Showpeople. The Council will work with other Councils across Suffolk to deliver identified needs for short stay stopping sites, including the delivery of one short stay stopping site within East Suffolk.”</td>
<td>To provide further clarity over requirements.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.