Email Council to Inspector 170615 re Gypsies & Travellers

From: Andrew Marshall Sent: 17 June 2015 15:21 To: Tony Blackburn

Dear Mr Pratt,

I refer to the above matter and the e-mail from Tony Blackburn which invited the Council's views on a number of issues relating to the planning for the accommodation needs of gypsies and travellers and in particular the implications of the Maldon Local Plan Inspector's report.

The Council takes the view that the approach being taken by the Council is both in line with national government guidance and is very different to that which was being pursued by Maldon Council.

It appears that Maldon Council have put forward a plan which fails to include a reliable, robust and up to date assessment of the accommodation needs of travellers. The Maldon Plan also seeks to take an inconsistent approach to planning for travellers as compared to how the the needs of other stakeholders have been dealt with. It appears that while the Maldon plan seeks to assess needs and then allocate land for other uses it is relegating the allocation of sites for travellers to a future and separate development plan document.

The situation at Bradford could not be more dissimilar. The Council is not seeking to rely on dated evidence or indeed on any form of limited internal review of the last relevant needs assessment. As you know the Council has commissioned Arc4 to carry out a full, robust and independent assessment of need, which has involved the relevant stakeholders within the work and will be seeking to implement its recommendations in full via a main modification to the Core Strategy. The work being carried out by Arc4 is in the Council's view consistent with the Government's technical guidance for completing such assessments and also consistent with Planning Policy for Traveller Sites 2012.

The second and crucial point to make is that unlike Maldon, Bradford Council will be seeking to allocate land in full for the needs of both travellers and travelling showpeople and to do this at the same time and within the same plan as for all other land uses. This will ensure that sites and land supply options are considered together in the most appropriate and sustainable way. The Council acknowledges that there is not currently a 5 year land supply of sites for gypsies and travellers and travelling showpeople. Indeed at present there is no supply for such uses as the Replacement Unitary Development Plan did not allocate sites and the Council has received no recent planning applications for the development of sites for either travellers or showpeople. However there are currently a number of vacant plots on the Council's site Esholt details of which will form part of the updated Accommodation Assessment from Arc4.

As with the supply of land for bricks and mortar housing, the Council takes the view that the best way to resolve this is to get a strategic plan, the Core Strategy in place as soon as possible, so that strategic decisions and issues have been resolved and that this will then allow for a quicker process for the completion of the site allocation plans which will be dealing with the shortage of land for both housing and for traveller sites. The Council have an up to date Local Development Scheme (LDS) and programme for the completion of the different components of the Local Plan. It will seek to identify and bring forward sites for travellers as soon as possible and all sites will be available immediately i.e. with no phasing of site release proposed.

In summary the Council considers that it will be in full compliance with paragraph 8 of Planning Policy for Traveller Sites 2012 in that the Core Strategy will set pitch and plot targets for travellers and showpeople, based on robust and objective evidence, which addresses in

full the permanent and transit site accommodation needs of travellers and further considers that it has worked collaboratively with stakeholders in doing so, including with neighbouring local planning authorities. The ways in which the Council have engaged with and worked with neighbouring authorities is detailed within its Duty to Co-operate Statement. This involved the sharing of evidence relating to Traveller sand traveller needs, considering options for joint working where appropriate, and consideration of any cross boundary issues and full consultation with neighbouring authorities on the draft emerging accommodation assessment.

With regards to paragraph 9 of the Government's guidance, the completion of the Core Strategy will enable the Council to move quickly to identifying within the Local Plan both a sufficient supply of deliverable sites to meet need in the short term and and indeed to allocate land in full for the 15 year plan period.

I hope the above clarifies the approach adopted the Council on this matter and highlights the view of the Council that the approach is in line with national guidance and in no way comparable with the approach adopted by Maldon from our review of the available information.

Yours Sincerely

Andrew Marshall

Planning & Transport Strategy Manager

City of Bradford Metropolitan District Council

Department of Regeneration and Culture