



Bridgend Replacement Local Development Plan 2018-2033



Background Paper 18: Gypsy and Traveller Site Options

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BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (LDP) 2018-2033

BACKGROUND PAPER 18: GYPSY AND TRAVELLER SITE OPTIONS

1.0 Purpose of the Report

1.1 This purpose of this Paper is to outline total and type of identified need for Gypsy and Traveller provision over the Replacement LDP period, before evaluating a range of site options to accommodate the need spatially. This Paper also clarifies instances where the situation has changed since the GTAA was published. The Paper then justifies one site as being suitable for allocation to meet the identified need.

2.0 Introduction

2.1 The Replacement LDP will guide development in the County Borough between 2018 and 2033. The LDP will identify certain locations where new development, such as housing and employment will be permitted, whilst also seeking to protect other areas from development. Once adopted, the LDP will form the basis for making decisions on individual planning applications within the County Borough. In addition to setting out the level of growth needed across the Borough over the plan period, the Local Authority must put forward a clear strategy to meet the identified need of Gypsy and Traveller accommodation within the Replacement LDP.

2.2 This Paper is one of a range of papers prepared to support the Replacement LDP and explains the Council's rationale and methodology for meeting the identified need for Gypsy and Traveller sites, through specific allocations in the Plan. These allocations will be supplemented through a criteria based policy to make provision for any additional need arising throughout the Plan period.

3.0 Legislation and National Guidance

3.1 Housing (Wales) Act 2014

The Local Authority has a statutory duty to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to its area under Part 3 of the Housing (Wales) Act 2014. The Act requires Local Authorities to undertake a GTAA at least every 5 years, although there is flexibility to undertake GTAAs more frequently if a material change in the level of need in the area has been identified. The GTAA must be subject to consultation and submitted to Welsh Ministers for approval. If an approved assessment identifies need for additional pitches within an Authority's area, the Local Housing Authority has a legal duty to ensure that need is met by exercising its powers under section 56 of the Mobile Homes (Wales) Act 2013.

3.2 Planning Policy Wales (Edition 11)

In relation to Gypsies and Travellers, para 4.2.35 advises that 'Local authorities are required to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need'. PPW advises that 'Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met'. The guidance goes on to advise that 'Planning authorities will need to demonstrate that sites are suitable for development and deliverable in the identified timescales'.

3.3 WG Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Sites

The Circular reinforces that 'The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and that the identified need for pitches is met. Local authorities are required to exercise their powers under section 56 of the Mobile Homes (Wales) Act 2013, as far as necessary, to ensure Gypsy and Traveller sites are provided for the unmet need'.

3.3.1 Local Authorities are advised in paragraph 38 of the Circular 'In deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services e.g., education settings, health services and shops'. Paragraph 39 goes on to say,

'Sites in the countryside, away from existing settlements, can be considered for Gypsy and Traveller sites if there is a lack of suitable sustainable locations within or adjacent to existing settlement boundaries. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local services. Over rigid application of national or development plan policies that seek a reduction in car borne travel in order to effectively block proposals for any Gypsy and Traveller Site in a countryside location would be inappropriate. Sites should be considered in context and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities'.

3.4 Welsh Government Guidance – Designing Gypsy and Traveller Sites

Delivering more sites, whether public or private, is an issue for Local Authorities to address, in order to find local solutions for local needs. Paragraph 3.17 of the Guidance states,

‘When considering locations for permanent residential sites, the preferences of community members should be included in the assessment process. However, Local Authorities are not expected to always provide sites in locations which mirror these aspirations. It is recognised other factors such as availability of land, site sustainability and achievability of planning permission will be more significant matters to consider’.

The Guidance also requires Local Authorities to consider the long-term impact of a concentration of pitches / sites in one particular part of the authority area. It is important the provision of large or multiple sites in one small area does not create spatial segregation of these communities and reduce interaction and long-term inclusion within mainstream services.

3.5 Development Plans Manual, Edition 3, 2020

Manual Guidance states that ‘LPAs must ensure the GTAA is up to date and identifies a need for the entire plan period. This work will need to be completed, in addition to the provision of appropriate site allocations (where relevant) prior to the statutory deposit stage. LPAs must ensure the GTAA has had formal sign off by the relevant Welsh Minister. The status of the GTAA supporting the plan must be clear’ (para 5.79).

3.5.1 Welsh Government wrote to all Local Authorities in September 2019 to confirm those undertaking an LDP Review must ensure the GTAA establishes an evidence base for Gypsy and Traveller needs across the entire plan period. Welsh Government also confirmed that this may necessitate undertaking of a new GTAA (and providing appropriate site allocations, where relevant) prior to the statutory deposit LDP consultation to ensure plans can be found sound through the examination process and are able to be adopted.

3.5.2 The LDP must be clear of the results of the GTAA in terms of the total and type of need over the plan period and the required timescales for meeting the need in line with the evidence. The Manual clarifies, “where there is a need for site allocations, LPAs should include a specific policy identifying the Gypsy and Traveller allocation(s) making clear the location and total number of pitches to be accommodated. The Plan must also clarify if the situation has changed since the GTAA was published and include a criteria based policy to make provision for any additional need arising throughout the Plan period”.

4.0 The Identification of Need

Status of GTAA, 2020

- 4.1 A refreshed GTAA was completed in 2020 to replace the previous GTAA for Bridgend County Borough that was published in 2016. It is a robust and credible evidence base which can be used to aid in the understanding of, and the provision of Traveller pitches and plots, and potential transit provision for the Replacement Bridgend Local Development Plan period to 2033.
- 4.2 The revised GTAA sought to understand the accommodation needs of the Gypsy and Traveller population in Bridgend County Borough through a combination of desk-based research, stakeholder engagement and consultation with members of the Travelling Community. In addition, a range of local stakeholders were invited to sit on a Project Steering Group. A total of 3 interviews were completed with Gypsies and Travellers living on authorised sites in Bridgend County Borough. In addition, an interview was completed with a Travelling Showperson household living at a site in Porthcawl, an interview was completed with a household living in bricks and mortar, and an interview was completed with a household living on a public site in another local authority with links to Bridgend. There are relatively low numbers of Gypsy and Traveller households that reside in or resort to the County Borough, yet this level of engagement indicates how comprehensively the GTAA was publicised. All primary interviews were successfully completed prior to the initial COVID-19 lockdown being imposed on 23rd March 2020.
- 4.3 The refreshed GTAA calculated a County Borough need of 5 pitches for the first 5 years of the GTAA period and a further 2 pitches for the remainder of the LDP period. The total calculated pitch provision needed for Gypsies and Travellers in Bridgend County Borough is therefore 7 pitches up until 2033. This total was the projected amount of provision necessary for the Local Housing Authority to meet its statutory obligations towards identifiable needs of the population arising in the area.
- 4.4 The GTAA was approved by Cabinet and submitted to Welsh Government for approval in December 2020, in order to ensure sufficient time for formal sign off by the relevant Welsh Minister prior to Deposit Stage consultation. Initial feedback was received from Welsh Government in April 2021, follow up meetings were held throughout May 2021 and the Local Authority responded to all questions raised. However, formal sign-off of the GTAA was not completed prior to consultation on the Deposit Replacement LDP. Nevertheless, the Council are in dialogue with Welsh Government on this matter and remain committed to progressing the GTAA to formal approval.

Identified Need and Latest Position

- 4.4 In advance of formal approval of the GTAA, the Council has proactively sought to address the identified need through the Replacement LDP. Circular 05/2018 states that the Council should work with the Gypsy and Traveller community when identifying sites, firstly considering sustainable locations within or adjacent to existing settlement boundaries with access to local services e.g., education settings, health services and shops. Sites in the countryside, away from existing settlements, can be considered for Gypsy and Traveller sites if there is a lack of suitable sustainable locations within or adjacent to existing settlement boundaries.
- 4.5 The Council's Housing Solutions Team therefore undertook more detailed accommodation assessments with the families that were originally interviewed as part of the GTAA process. This exercise revealed two important factors. Firstly, Family A had already relocated to another authorised site in the County Borough and no longer requires assistance from the Local Authority (planning application P/17/891/FUL refers). This reduced the outstanding need to six pitches. Secondly, the two other families (who both required three pitches) stated they were only willing to reside on their own private sites and would not consider renting pitches from the Local Authority under any circumstances. Therefore, the Local Planning Authority undertook further engagement with these two families identified as being in accommodation need.
- 4.5.1 Family B (three pitch need) already resided on an authorised site at the time the GTAA was conducted, and the existing consent already allowed for one additional caravan on site in the form of a mobile home. Family B therefore submitted a planning application to intensify their existing site and provide space to accommodate the net need identified. Planning consent was granted to further increase the net number of caravans on site by two (one additional mobile and one additional static), thereby enabling up to four households to reside on the site (planning application P/21/677/FUL refers). Detailed discussions between the Local Planning Authority and Family B have confirmed that this consent will enable the family's accommodation needs to be met completely and no further assistance is required from the Local Authority.
- 4.5.2 Family C (three pitch need) did not reside on an authorised site and were living in bricks and mortar at the time of the GTAA. Detailed discussions between the Local Planning Authority and Family C confirmed the family were settled in bricks and mortar within the area, although the family are members of the Showmen's Guild of Great Britain and would prefer to reside on a private showperson site. Family C also reported ownership of a 0.2 hectare site off Old Coachman's Lane, Court Colman, which is outside of the existing settlement boundary. There is need to determine

whether the site is suitable to meet the family's identified need, assessed against other potential site options.

5.0 Identification of Sites

- 5.1 The Council undertook a Call for Candidate Sites between September and November 2018, during which any landowner, developer or other interested person could put forward land for consideration for inclusion in the Plan. Despite over 170 sites being submitted to the Council for consideration, no sites were submitted for Gypsy and Traveller proposals. Equally, no other sites were submitted for Gypsy and Traveller Sites during the consultation on the Preferred Strategy (September to November 2019).
- 5.2 Therefore, the Council's Corporate Landlord Department undertook a detailed search of sites in the Council's ownership to provide options to meet this identified need. The initial search began by considering whether the Council owned any land adjoining any existing authorised Gypsy and Traveller sites. However, no adjoining land was found to be in Council ownership.
- 5.3 A comprehensive range of surplus and vacant land assets was then considered, which involved perusing the Council's Main Asset list, Strong Communities Connecting Services Plans and BridgeMaps system. The latter search sought to identify sites within or adjacent to existing settlement boundaries, or outside of the existing settlement boundaries if no suitable sites were otherwise found. This approach was strictly in conformity with the sequential search sequence outlined in Circular 005/2018. This process identified a limited number of a sites, which enabled a shortlist to be compiled based on Corporate Landlord's assessment of the current status and suitability of these sites for this use. The shortlist of sites is detailed overleaf for ease of reference, along with relevant planning constraints and the results of the site assessment.

5.4 Figure 2: Brewers Garage and Land Adjoining, Caerau (1.72 hectares)



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Planning Consideration	Comments
Settlement Boundary	Partially outside of existing settlement boundary
Flood Risk	Site does not lie within a Flood Risk Zone
Nature Conservation Designations	The site is not within an area of nature conservation interest.
Green Wedge	Outside of boundary
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are no tree preservation orders in or around the site boundary
Agricultural Land Classification	Predictive Agricultural Land Classification Code - U
Minerals Interest	Partially within an existing secondary coal resource safeguarding area
Contamination	There are no known contamination constraints at the site
Planning History	P/07/400/BCB - Change of use to build a multi- use games area

5.4.1 The site is located on the periphery of Caerau, a community-based settlement located approximately 2 miles north of Maesteg in the Llynfi Valley. The site comprises 1.72 hectares in total and lies partially outside of the existing designated settlement boundary. The site is bound to the north and west by residential properties, to the south by a footpath, to the east by open countryside, surrounded by mountainous terrain and forestry. The Llynfi River is also located to the south. Caerau was classified at a Local Settlement within the Settlement Assessment, recognising that it does not have a large degree of self-containment and is served by a limited range of local retail and community services to meet the needs of its immediate population. Whilst only a proportion of the overall site would be needed to accommodate Gypsy and Traveller provision, this site is not considered to be an optimal location for this use. The site is located in a relatively isolated position at the north of the Llynfi Valley and is not particularly accessible through sustainable modes of transport. Access to a wide range of services and facilities is also limited. Moreover, given the site's proximity to existing residential properties, development may adversely affect residential amenity and not be conducive to the promotion of peaceful and integrated co-existence between the site and the local community. For these reasons, the site is not considered suitable for Gypsy and Traveller provision.

5.5 Figure 3: Land at Bwlch-y-Clawdd Road, Nant-y-moel (6.61 hectares)



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Planning Consideration	Comments
Settlement Boundary	The site lies within the Nant-y-moel settlement boundary
Flood Risk	The site does not lie within a Flood Risk Zone
Nature Conservation Designations	Partially within Nant-y-moel Conservation Area
Green Wedge	Does not lie within a Green Wedge boundary
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are no tree preservation orders in or around the site boundary
Agricultural Land Classification	Predictive Agricultural Land Classification Code - U
Minerals Interest	There are no mineral constraints within the boundary of the site
Contamination	There are no known contamination constraints at the site
Planning History	N/A

5.5.1 The site is located within the settlement of Nant-y-moel, a small community to the north east of the County Borough, approximately 12.4 mile from Bridgend Town Centre. The site measures approximately 6.61 hectares and lies within the Nant-y-moel settlement boundary. The site is bound to the immediate north, south and west by residential properties and to the east by open countryside. In terms of scale, the site is far more substantial than the need identified. The settlement of Nant-y-moel is served by a limited a range of local retail and community services to meet the needs of its immediate population. However, access to wider services is only achievable through unsustainable means of travel. Additionally, the sites lies partially within the Nant-y-moel Conservation Area. Any development within or adjacent to a conservation area will only be permitted if it would preserve or enhance the character and appearance of the conservation area or its setting. The site is also presently surrounded by residential properties and acts as a green space in the centre of the community. Gypsy and Traveller provision in this location may therefore adversely affect residential amenity and would not be conducive to the promotion of peaceful and integrated co-existence between the site and the local community. For these reasons, the site is not considered suitable for Gypsy and Traveller provision.

5.6 Figure 4: Land at Glynteg, Bettws (1.72 hectares)



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Planning Consideration	Comments
Settlement Boundary	Partially within the existing settlement boundary
Flood Risk	The site does not lie within a Flood Risk Zone
Nature Conservation Designations	The site does not lie within a Nature Conservation Area
Green Wedge	The site is not within a Green Wedge
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are no tree preservation orders in or around the site boundary
Agricultural Land Classification	Predictive Agricultural Land Classification Code - U
Minerals Interest	There are no mineral constraints within the boundary of the site
Contamination	There are no known contamination constraints at the site
Planning History	N/A

5.6.1 The site lies within the existing settlement of Bettws at the foot of the Valleys. The site is located at the south western tip of the settlement of Bettws and lies partially within the existing settlement boundary. The settlement is in a relatively rural location within the borough and the site itself, measuring 1.72 hectares, lies adjacent to extensive open countryside to the west and a cluster of residential properties to the immediate east. In the Settlement Assessment, Bettws, considered a local settlement, was found to have a low level of facilities and services as well as no active travel routes. Based on this the site is considered to be unsustainable, given that any potential residents would be highly reliant on private car use to access a wider range of amenities and services. Moreover, Gypsy and Traveller provision in this location would not be conducive to the promotion of peaceful and integrated co-existence between the site and the local community. For these reasons, the site is not considered suitable for Gypsy and Traveller provision.

5.7 Figure 5: Land rear of Victoria Road, Kenfig Hill (3.2 hectares)



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Planning Consideration	Comments
Settlement Boundary	The site lies outside of the existing Kenfig Hill settlement boundary
Flood Risk	The site does not lie within a Flood Risk Zone
Nature Conservation Designations	The site does not lie within a Nature Conservation Area
Green Wedge	The site lies within a current adopted Green Wedge

Planning Consideration	Comments
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are no active Tree Preservation Order's within or adjacent to the boundary of the site
Agricultural Land Classification	Predictive Agricultural Land Classification Code - U
Minerals Interest	Within Secondary Coal Resource Safeguarding Area
Contamination	There are no known contamination constraints at the site
Planning History	N/A

5.7.1 The site is located at the north eastern corner of the settlement known as Kenfig Hill and lies outside of the established settlement boundary. Kenfig Hill is considered a Main Settlement in conjunction with Pyle and North Cornelly, to which it lies adjacently. Kenfig Hill is served by a variety of amenities and services in relatively close proximity to the site. The site is surrounded by residential properties which enclose it from the west, while to the east lies arable field and open countryside. At present the site is partially occupied by clustered woodland and falls within the 'Green Wedge' boundary. Green Wedges are not proposed for retention within the Replacement LDP; defined settlement boundaries and policies are considered sufficient to strictly control development in the countryside, open space, biodiversity, landscape and the environment. Nevertheless, the site is not considered to be a suitable location for development outside of the settlement boundary. The close proximity to existing residential properties would adversely affect residential amenity and provision of a Gypsy Traveller site at this location would not be conducive to the promotion of peaceful and integrated co-existence between the site and the local community. The site also lies within a Secondary Coal Resource Safeguarding Area. Given the outlined environmental constraints of the site, coupled with the impact that residential development at the site would have on the existing vernacular and setting of the area, the site is therefore not considered suitable for the provision of Gypsy and Traveller accommodation.

5.8 Figure 6: Plas Morlais, North Cornelly (0.2 hectares)



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Planning Consideration	Comments
Settlement Boundary	The site lies within the existing North Connolly settlement boundary.
Flood Risk	The site does not lie within a Flood Risk Zone
Nature Conservation Designations	The site does not lie within a Nature Conservation Area
Green Wedge	The site does not lie within a Green Wedge
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are no active Tree Preservation Order's within or adjacent to the boundary of the site
Agricultural Land Classification	Predictive Agricultural Land Classification Code - U
Minerals Interest	There are no mineral constraints within the boundary of the site
Contamination	There are no known contamination constraints at the site

Planning Consideration	Comments
Planning History	P/19/408/NMA - Land off Plas Morlais North Cornelly - Non material amendment to P/17/561/RLX to change some windows and cladding
	P/19/399/DOC - Land off Plas Morlais North Cornelly - Approval of details for conditions 3 & 4 of P/17/561/RLX
	P/17/561/RLX - Land off Plas Morlais North Cornelly - Removal/variation of conditions of P/14/522/FUL (
	P/14/522/FUL- Land off Plas Morlais North Cornelly - Erect 4No. Dwelling Houses - Barnhaus Pilot Project
	P/12/304/DPN - Plas Morlais North Cornelly Bridgend CF33 4LU Proposal - Demolition of 21 No Dwellings on Plas Morlais

5.8.1 The site is located at the east of the Borough within the North Connolly settlement boundary. Along with Pyle and Kenfig Hill, North Connolly is considered a 'Main Settlement' as per the Settlement Assessment. North Connolly is served by a wide range of amenities and services which would be accessible via means of sustainable transport such as walking and cycling. The site measures approximately 0.2 hectares. The site sits within a large residential area and lies adjacently to the east of Pyle cemetery. The site itself consists of a small patch of tarmac and is surrounded immediately by residential dwellings. The provision of Gypsy and Traveller Accommodation at this site would not be sympathetic to existing residential amenity. Given the proximity of the site to existing residents, assimilation of Gypsy and Traveller provision in to the middle of the existing street scene at this location would negatively impact on existing community cohesion and sit incongruously within the street vernacular. For this reason, whilst the site is within the settlement boundary, development for Gypsy and Traveller provision would conflict with

the holistic principles of Circular 005/2018, which seek to promote peaceful integrated co-existence between sites and the local community. The site would therefore not be suitable for Gypsy and Traveller provision on this basis.

6.0 Alternative Sites

- 6.1 As demonstrated above, the Council has exhausted its shortlist of available sites to accommodate the need within existing settlement boundaries. None of the sites are considered suitable in planning terms, with reference to the criteria set out in Circular 005/2018. Detailed analysis of the sites show that they would have a detrimental impact on residential amenity and not promote peaceful integrated co-existence with the local community.
- 6.2 Given the lack of suitable locations within or adjacent to existing settlement boundaries, as demonstrated above, the search sequence was extended to sites in open countryside. This approach is in accordance with Circular 005/2018, which states that “sites in the countryside, away from existing settlements, can be considered for Gypsy and Traveller sites if there is a lack of suitable sustainable locations within or adjacent to existing settlement boundaries”.

6.3 Land south of M4 Motorway off Old Coachman’s Lane Court Colman

- 6.3.1 This site is already in the ownership of Family C, immediately to the south of the M4 motorway and within open countryside. The closest amenities and services are accessed via the nearby local settlement of Pen-y-fai, an approximate 8 minute cycle or 30 minute walk. Planning consent was recently granted for four stable blocks (P/20/103/FUL) to accommodate horses. As part of the Accommodation Assessment, Family C stated that this site would be suitable for their accommodation needs and they would prefer to reside permanently on this site rather than in bricks and mortar. The site is surrounded by a number of existing trees, hedges and open fields that provide sufficient screening, with Public Footpath NEW/8/2 located to the north. Further discussions with Family C have revealed that they are in the process of preparing a planning application to develop three pitches at this location, which will demonstrate deliverability, subject to the Development Management process.

Figure 7: Land south of M4 Motorway off Old Coachman's Lane Court Colman Bridgend (0.2 hectares)



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Planning Consideration	Comments
Settlement Boundary	The site lies outside of a settlement boundary
Flood Risk	The site does not lie within a Flood Risk Zone
Nature Conservation Designations	The site is adjacent to, but not within, a Site of Importance for Nature Conservation
Green Wedge	The site is not within a Green Wedge
Heritage Conservation	The site is not close to any listed or heritage assets
Tree Preservation Orders	There are Tree Preservation Orders adjacent to the site but none are within the site boundary
Agricultural Land Classification	Predictive Agricultural Land Classification Code – 3b

Planning Consideration	Comments
Minerals Interest	The site is partially within Secondary Coal Resource Safeguarding Area
Contamination	There are no known contamination constraints at the site
Planning History	P/20/103/FUL - Construction of 4 stables

6.3.2 A full utilities check has been undertaken to confirm the site’s capacity for connection to the existing gas and electricity networks. The utilities check confirmed there are no conflicts with network assets, and in terms of capacity the site would not be an issue from a National Grid or Wales and West Utilities perspective. Welsh Water have also confirmed there are no issues in terms of sewage disposal or water provision. However, due to the proximity of the site to a Welsh Water asset, any development would need to be sympathetic to the existing installation.

6.3.3 Whilst the site is in a countryside location, there are a lack of suitable, sustainable and deliverable alternatives within or adjacent to existing settlement boundaries that are in the Councils existing ownership. In addition, no other candidate sites have been submitted for this use. Family C’s consider the site suitable to meet their identified accommodation needs and it is already in the family’s ownership. Therefore, based on the sequential approach outlined in Circular 005/2018, the site is considered the only suitable option to propose for allocation in the Replacement LDP. Indeed, Paragraph 39 of Circular 005/2018 makes it clear that, “over rigid application of national or development plan policies that seek a reduction in car borne travel in order to effectively block proposals for any Gypsy and Traveller Site in a countryside location would be inappropriate”.

7.0 Conclusions

7.1 The Replacement LDP has been informed by the findings of the GTAA 2020, which originally identified need for seven pitches. Since this time, Family A have met their accommodation needs (for one pitch) by relocating to an existing authorised site in the County Borough. Family B have also received planning consent to intensify their existing authorised site and meet their accommodation needs (for three pitches). This leaves a remaining need for three pitches for Family C.

7.2 In absence of any candidate site proposals or representations at Preferred Strategy Stage, a detailed search of sites in Council ownership was therefore

undertaken prior to Deposit Stage. This process followed the sequential search sequence outlined in Circular 005/2018, although did not identify any suitable sites within existing settlement boundaries. The Council therefore expanded the search for sites outside of settlement boundaries and considers the site at Old Coachman's Lane, Court Colman to be appropriate for allocation in accordance with national policy. The site is in Family C's ownership and is considered deliverable within the Replacement LDP period. Specific allocation of this site will ensure that the Plan has the capacity to respond to the remaining identified need, through provision of 3 pitches at this location. The proposed allocation is sufficient in scale to meet the need within the timescales specified and there are no impediments to delivery.