

King's Lynn & West Norfolk Local Plan Review Examination

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Claire May
Planning Policy Manager
Borough Council of King's Lynn & West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk PE30 1EX

By email via the Programme Officer

Dear Mrs May,

Examination of King's Lynn & West Norfolk Local Plan Review: Gypsy and Traveller Accommodation Assessment, June 2023

We refer to the King's Lynn & West Norfolk Borough Council Gypsy and Traveller Accommodation Assessment (GTAA), June 2023, recently submitted to us along with your covering email to the Programme Officer, dated 9 June 2023.

The updated GTAA identifies a significant level of additional need for Gypsy and Traveller accommodation within the Plan period for the Local Plan Review (LPR) up to 2039, in comparison with that identified in the 2016 GTAA. You indicate that the Council will now start to look at how to address the identified need, but that this work could take until Spring 2024 to complete. We note your concern that this is likely to extend the Examination of the LPR beyond 2 years from first submission, which will require the Council to revisit the overall housing need for the Borough, with further consequential delay to the Examination. Therefore, you have requested our views on whether provision for Gypsy and Traveller accommodation could be addressed in a separate Development Plan Document (DPD) following the adoption of the LPR.

Whilst we understand the Council's concerns about the potential delay to the Examination of the LPR, we do not consider that deferring the identification of a supply of sites to meet the accommodation needs of Gypsies and Travellers is justified as an appropriate strategy, on the following basis:

1. The 2023 GTAA identifies a pressing level of need for Gypsy and Traveller accommodation, with up to 76 pitches for Gypsies and Travellers who meet the definition in the Planning Policy for Traveller Sites (PPTS) and 4 plots for Travelling Showpeople, required within the next 5 years (2023-2027). This represents the majority (approximately 75%) of the need identified over the Plan period.
2. If this need were to be addressed in a separate DPD, following the adoption of the LPR, it is unlikely the pitches required would be provided within the next 5 years. Assuming adoption of the LPR in mid-2024, we estimate that it would take until at least 2027 for a DPD to be prepared, consulted upon, examined and adopted.
3. Therefore, if the LPR were to be modified to direct that the supply of sites to meet Gypsy and Traveller accommodation needs should be addressed in a separate DPD, it would fail to meet the Borough's objectively assessed needs for Gypsy and Traveller accommodation, three-quarters of which the GTAA says are required to be provided by 2027. As such, we are unlikely to find the LPR positively prepared if it sought to adopt this approach.
4. National policy in the PPTS seeks to ensure fair and equal treatment for Gypsies and Travellers, amongst other things, by requiring local planning authorities, in producing their Local Plan, to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets. Therefore, deferring this to a subsequent DPD would not be consistent with national policy, nor with our responsibilities under the Public Sector Equality Duty.

For these reasons, it is likely the LPR would be found unsound if the Council were to pursue the option of meeting the need for Gypsy and Traveller accommodation through a separate DPD.

Accordingly, we would invite the Council to undertake the necessary work to identify a supply of sites to meet the identified need for Gypsy and Traveller accommodation through the LPR, for consideration as part of our Examination. This work should also address the need identified for undetermined households and those who do not meet the PPTS definition. To address the latter may require a review of the housing requirement and supply for general housing needs, if, as indicated in the GTAA, the needs of households that do not meet the PPTS definition are to be met through other policies in the LPR.

The Council should provide a timetable for this work for publication on the Examination website by 5 July 2023.

On receipt of this letter, please would the Council upload a copy to the Examination website, along with a copy of the June 2023 GTAA.

We are not inviting or proposing to accept comments on this letter from any other Examination participants. Consultation on the GTAA and any future Hearing sessions on this matter will provide the opportunity for any representations on the issues raised in this letter and the associated evidence to be made and considered as part of our Examination.

Yours sincerely,

Karen L Baker

INSPECTOR

Mike Hayden

INSPECTOR