

Please can you pass the attached on to the Council:

As part of our ongoing post-hearings deliberations, we wish to raise the following matters:

Provision for Gypsies and Travellers and Travelling Showpeople

We need to ask whether the Council needs to revisit, modify, or update the GTAA (EX/CYC/88) in the light of the recent *Lisa Smith* judgment?

Notwithstanding the response to that question, there may be a need to adjust draft Policy SS1 (as proposed to be modified in EX/CYC/111) to accord with the terms of the judgment, with particular reference to those that meet, and those that do not meet, the 'definition'.

Further, there are some additional observations we would make about Policy H5 (as proposed to be modified in EX/CYC/111). First, H5 a) which deals with the provision of 10 extra pitches on existing local authority sites ought to make clear when those additional pitches will be provided. Second, H5 b) which refers to 30 pitches to be provided as part of the strategic allocations gives no indication of when those pitches might come forward, and (in detail terms) where. In short, it would be helpful if the Council could provide a trajectory for the provision of the 40 additional pitches, identifying the number of pitches each site will provide, and when that provision is expected to take place. We need to see a satisfactory rolling supply of pitches over the Plan period.

Green Belt Boundaries

Site visits have shown up a few concerns about detailed Green Belt boundaries. In particular, these relate to the approach to sports fields that are part of a wider complex where the boundary has been drawn tight around buildings, rather than the overall complex itself. This does not appear correct where the sports facilities involved involve enclosures of significant height, floodlighting, and other facilities, that make little or no contribution to openness. It seems to us that in these cases, the boundary would be better drawn around the curtilage of the facility involved, especially when boundaries to that curtilage are significant in themselves, and more easily defensible. As examples, we would point to the approach taken to Queen Elizabeth Barracks, where an area within the eastern part of the complex has been included in the Green Belt despite the presence of significant infrastructure. Also, at St Peter's School, the flood defence bund would appear to be a more rational Green Belt boundary than the school buildings (some of which are scheduled for replacement in any event) given the nature and scale of the sports facilities behind it. Similarly, the (very strong) boundaries of the school grounds, rather than the buildings, at the Joseph Rowntree School, and Burton Green Primary School, would seem to us to offer more easily defensible Green Belt boundaries. There may be other examples too and we would encourage you to review other boundaries of this type, in the light of our comments.

Your letter of 14 November 2022 is noted and we will endeavour to have all our post-hearings observations with you in time for you to have a final schedule of MMs and any other material in place by mid-December 2022.

Thanks Carole – this can be published on the website alongside the Council's letter of 14 November, and all the H59 material (that I am currently considering).