SOUTH EAST ENGLAND REGIONAL ASSEMBLY
REGIONAL PLANNING COMMITTEE

Date: 28 January 2009

Subject: **Gypsies, Travellers and Travelling Showpeople Review: Preferred Option**

Report of: Regional Planner

Recommendations:

That Regional Planning Committee notes the results of consultation and recommends to the Assembly support for:

1. Provision of an additional 1,064 permanent residential pitches for Gypsies and Travellers and 276 for Travelling Showpeople, for the period 2006-2016.

2. The Option D residential pitch distribution for both Gypsies and Travellers and Travelling Showpeople, as tabulated at Annex 3.

3. The revised approach to and allocations for provision of transit, temporary and emergency stopping places, as set out in Section 5.4 of the report and as tabulated at Annex 4.

4. The content outline for the new policy at Annex 5.

Purpose of the report:
To agree what overall provision and distribution of pitches for Gypsies, Travellers and Travelling Showpeople (GTTS), both permanent and temporary stopping, should be recommended to the Assembly for agreement as regional advice to government on provision in the South East.

Key issues:
The Assembly undertook Issues and Options public consultation on four options for the distribution of permanent residential pitches for GTTS based on the total level of need identified in combined final council advice, and an additional homeless element of need for Showpeople: 1,064 pitches for Gypsies and Travellers, and up to 276 for Travelling Showpeople (2006-2016). In the absence of comprehensive transit advice we also consulted on whether to delegate identification of need for transit provision to local authorities, rather than make specific allocations.

There was a good level of response including 1,129 valid questionnaires received, of which 382 were from GTTS. Regrettably 148 (13%) were deemed discriminatory by legal advisors and are therefore being returned to the consultees.

The consultation revealed strong overall support for making both permanent and transit provision to reduce unauthorised sites, and for doing so throughout the region. There is a mix of views on the adequacy of the level of provision proposed, but no substantive new evidence to justify specific changes from the level of need consulted upon. The report therefore recommends no change in total permanent provision. GTTS widely perceive the allocations as being too low.

The Option D approach is recommended as preferred option. Consultation has revealed strong support overall for wider regional redistribution, especially so amongst GTTS (66% support, 51% for the most redistributive Option C) but also by the general public. This provides some hard evidence of a community case for redistribution previously lacking and now difficult to ignore. This case is strengthened by the recommendations arising from the East of England Examination in Public, supporting regional pitch redistribution both in principle and on practical grounds to improve delivery and choice, and specifically rebutting a number of arguments against it raised in our region. Option D also offers a compromise between wider preferences and that of the majority of councils, who oppose regional redistribution and favour Options A and/or B. Gypsy and Traveller and Showpeople pitch allocations are tabulated at Annex 3 using our existing methodology. Some changes to the consultation distributions, these arise from updating to the latest available criterion data.

The consultation also indicated widespread doubts about the merits of the delegated approach to transit provision, and experience from the East of England indicates an allocative approach should be put forward. The panel report helpfully develops an approach that we recommend using: specific allocations in accordance with Circular 1/2006, but to county-group level for refinement through local studies delegated to county group level. Where councils have provided transit advice, the allocations directly reflect it and follow-up work may not be necessary. As in the East Caravan Count data is used to generate county estimates where no advice was provided. The total regional requirement arising is 177 pitches (tabulated at Annex 4). The form of provision eg emergency stopping, seasonal site or permanent transit site would be locally determined.

1. Report structure

1.1 Section 2 of the report re-caps the proposals consulted upon and the consultation process. Section 3 and Annexes 1 and 2 summarise the consultation results. Section 4 draws out relevant lessons from the East of England GTTS Panel Report. Section 5 addresses the key issues in turn: level of provision, distribution options, transit provision, sustainability and GTTS policy content. Annexes 3 and 4 tabulate residential and transit pitch allocations respectively, and Annex 5 provides a content outline for the new GTTS policy. Section 6 notes next steps.

2. Background and context

2.1 The Assembly on 16 July 2008 agreed for the purposes of Issues and Options public consultation four options for the distribution of permanent residential pitches for GTTS based on the total level of need identified in combined final council advice, and an additional homeless element of need for Showpeople: 1,064 pitches for Gypsies and Travellers, and up to 276 for Travelling Showpeople (2006-2016). The Assembly also agreed to consult on an approach where the level of transit provision would be locally determined.

2.2 Issues and Options consultation ran 1 September 2008 to 21 November 2008. It included 26 local consultation events, a regional stakeholder workshop, Gypsy and Traveller focus group sessions, and a MORI poll of 1,000 residents. A questionnaire was used to collect structured feedback.

2.3 To ensure community input, Gypsy and Traveller representatives were commissioned to visit sites, authorised and unauthorised including roadside encampments, and also housed Gypsies and Travellers, to explain the process, the consultation issues and questions, and to help respondents complete the questionnaire[1]. Over 300 forms were returned via the survey with approximately even coverage for each county group area.

3. Headline consultation results

3.1 This section provides a brief overview of the main consultation messages. Annexes 1 and 2 respectively provide a more detailed statistical analysis and commentary summary of the consultation questionnaire responses. Residents views expressed in the MORI survey tended to be broadly similar to, but more moderate, than those of residents responding directly.

3.2 <u>Response rate</u>
There were 1,129 valid responses of which we have accepted 981. We are legally required to identify and return discriminatory responses, and exclude them from further consideration – 148 are being returned. Of the 981 accepted: 7% were from SE councils, 39% from GTTS communities, 19% from

[1] The Showmen's Guild did not feel it necessary to survey their members directly, instead at their recommendation the consultation was publicised in World Fair, the show trade gazette.

SE residents (plus another 1,000 by MORI poll) and the balance of 35% from other organisations and stakeholders (mostly town and parish councils).

3.3 A clear mandate for action

There was strong overall support for:- provision to reduce unauthorised encampments, provision in all parts of the region and provision near jobs and services (84-89% overall strongly agreeing or tending to agree).

3.4 Level of provision

Somewhat predictably there was a tendency for residents to say the proposals were 'too high', Gypsies and Travellers to say 'too low', and councils to say 'about right' (although half of councils did not comment). Various anecdotal comments and personal observations and experiences were cited in support of need estimates being too high or low. Other than in the Thames Valley[2], the Showmen's Guild accepts the identified level of provision as a minimum starting point subject to future review. Note also Oxfordshire authorities have just completed a TSAA indicating need for 33 rather than 7 TS pitches in the county to 2016. Consequential adjustments to figures are used in this report would be appropriate if Oxfordshire councils submit updated formal advice once they have had an opportunity to formally consider their TSAA findings.

3.5 Preferred option

3.5.1 Overall responses favour redistribution (57% options C and D). Notably GTTS favoured greater redistribution: 51% support option C. In addition 15% support option D including the Showmen's Guild and the National Federation of Romani Gypsy and Traveller Liaison Groups (Southern Network). This provides the hard evidence of a community case for redistribution previously lacking. Councils were almost the mirror opposite, with 63% favouring no regional redistribution and most favoured the option lowest for their area. Option A has 43% support.

3.5.2 Credible arguments were put forward for and against all four options, as well as a few credible but not inherently preferable variations to criteria or the methodological basis for the redistributive options (see Annex 2 for fuller details and a response). The only wholly different approach comes from Friends, Families and Travellers: Option A+, need arising but adding extra pitches in low provision areas.

3.6 Transit approach

There was 79% support for providing stopping places in locations where that often occurs. As to whether the proposed delegated approach could be improved upon, there was a fairly low and mixed response overall. Responses tended to the view that count data need to be used with caution, and that there needs to be more research including consultation with Gypsies and Travellers. It was also noted that GTAA guidance requires consideration

[2] The Guild criticise high turnover assumptions employed in Buckinghamshire and Berkshire, although the Guild's views were known when their advice to the Assembly was submitted and agreed. Unless the authorities concerned are minded to change their advice in response this matter is perhaps best resolved at Examination in Public.

of transit need, that this is an important element in the overall package of provision, and that specific transit provision allocations form part of the requirements of Circular 1/2006.

4. The East of England GTTS Panel Report

4.1 The above report was published in December 2008, shortly after our consultation period closed. It offers some useful insights as to how inspectors have worked through arguments for and against redistribution that have featured prominently in our process, how they have tackled the issue of constraints on provision, and assessment of transit requirements on a limited evidence base.

4.2 Redistribution

4.2.1 The Panel accepted that achieving a more 'balanced' pitch distribution is sound in principle. They viewed the East redistribution option[3] as a rebalancing mechanism to progress towards an eventual pattern of provision better suited to overall needs and more capable of meeting ongoing requirements. They agreed that there should be greater equity between authorities in pitch provision, and that widening responsibility for provision should help speed up delivery.

4.2.2 Responding to arguments that redistribution could prevent GTTS living where they want or split families/networks, the Panel noted that strengths of local connections vary, that some GTTS appeared willing to be flexible and thus that adverse effects could not be generally presumed. They could be avoided if the entire family moved together. Individual development control decisions could respond to specific family circumstances.

4.3 Constraints

The Panel concluded that Green Belt and environmental designations did not preclude achievement of modest provision in any district, noting that some, minor Green Belt boundary changes would likely be necessary.

4.4 Transit provision

EERA did not consult on nor submit transit proposals for examination. The Panel were firmly minded to include them, and took an inclusive definition of transit to include seasonal and emergency stopping places, not just formal transit site provision. They used Caravan Count-based need estimates as a common starting point for Examination debate, taking into account relevant GTAA information and other evidence provided. Their conclusion was that their refined, count-based estimates were adequately robust for use at county-group level but not for district-level allocations, and they recommended local studies to refine the details at site and district level. The appropriate balance between provision formats would be locally determined.

[3] East of England's preferred option was to top-slice provision in the four highest authorities, to top up all districts to a minimum of 15 pitches, which the Panel supported (existing provision in the East is very concentrated).

5. Toward a preferred option

5.1 This section works through the key SE issues in turn, looking at the pros and cons of the more credible possibilities and in each case noting the approach that seems most reasonable.

5.2 Levels of provision

We recommend that no change be made to the proposed levels of permanent pitch provision[4]. Whilst there are diverging views on the robustness of the pitch levels proposed, there is little specific, new evidence to consider. The generalised nature of consultation feedback makes it very difficult to determine whether in fact a change is justified, let alone precisely what change to make. A view expressed at the regional stakeholder workshop perhaps serves as a summary: the proposals may tend to err on the 'underestimate' side, but are still a significant step forward and a place to start based on the best available evidence.

5.3 Preferred option

5.3.1 All the options put forward for consultation are credible and could be defended at Examination in Public, but none are immune from criticism. In terms of their relative merits:

- A majority of councils oppose regional redistribution and prefer options A and/or B. But based on consultation feedback (GTTS and residents) and the Panel findings in the East of England to proceed on this basis would ignore the clear mandate established for a degree of regional redistribution to widen GTTS choice and responsibility for provision.

- The Friends, Families and Travellers' alternative option of 'A plus top-up' could meet these objectives whilst also predominantly following need assessment evidence, but by increasing overall provision[5] above the total level supported as robust in combined council advice. It also diverges from the agreed Assembly approach, that allocations should be guided by planning and sustainability criteria.

- Option C finds most support in SE consultation, but the implications for Hampshire are significant. Hampshire has the lowest (per authority average) level of existing provision and highest county-group level of unauthorised encampments, so a case can be made for increasing relative provision. But the 100% increase under option C is perhaps extreme.

5.3.2 On balance we recommend Option D as a deliverable compromise. We also recommend that option B should continue to be the starting point for regional redistribution (rather than A), as the local redistributions put forward within option B will also help deliverability by widening responsibility for provision. In addition the Showmen's Guild and The National Federation

[4] Showpeople figures for Oxfordshire could be updated in line with the recent TSAA if advice is provided in time, if not they could be submitted at Preferred Option consultation stage.
[5] A top-up to eg 10 pitches minimum would add around 150 pitches regionally.

of Romani Gypsy and Traveller Liaison Groups (Southern Network) both support option D, as a balance between recognition of the reasons why GTTS gravitate to particular areas (employment, family links etc), and the need for each Authority to play a part in resolving the need for new sites.

5.3.3 We also recommend that the redistribution methodology remain the same. There was little overall call for change, nor much common ground on the alternative approaches or criteria proposed. The alternatives whilst credible do not appear inherently preferable. Groups of councils will retain the option to pool and redistribute their combined allocations between them if they so wish. However we have taken the opportunity to update our methodology to the latest datasets and improve their combination[6], and this in itself **changes the distributions** the current methodology generates. The updated option D distributions are tabulated at Annex 3.

5.4 Transit

5.4.1 The wholly delegated approach we consulted upon appears insufficient based on both consultation feedback, and in particular Circular 1/2006 requirements as reflected in the expectations and intervention of the Panel in the East of England GTTS partial review Examination in Public. The Panel's recommended approach was county group-level allocations plus local/county follow-up studies to determine location, size and type (covering the full range of options, formal transit sites, seasonal and emergency stopping places; mix to be determined locally).

5.4.2 We recommend adapting the same approach for use in the South East, in effect a midpoint between the delegation we consulted upon and the district/unitary-level allocations required by Circular 1/2006. Annex 4 tabulates the arising South East requirements for stopping places, summing regionally to 177 pitches or stopping-place equivalents. Where councils have assessed transit need and provided advice the proposed allocation and any locational commentary is based directly on their advice, consistent with our approach on residential provision. Where they have not, Caravan Count-based estimates are employed[7]. Helpfully, a comparison between advice where given and Caravan Count estimates shows the results are similar.

5.4.3 The Secretariat will investigate whether there is value in regionally examining patterns of transit movement, traditional routes and higher-level evidence of type, scale and location of provision required, to support the more specific local work the above approach requires. The aim would be to complete this work to inform EiP considerations.

5.5 Sustainability Appraisal and Habitat Regulations Assessment

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[6] The redistribution criteria indicators are 'Population at 2016', and 'area not designated: AONB, Green Belt, National Park, SSSI/SAC/SPA and flood risk zones 2 and 3'. The most notable change is the recent availability of digitised Green Belt boundaries, which has eliminated an element of land-constraint double-counting acknowledged by footnote in earlier RPC reports.

[7] Specifically, the **higher of** the 2004-2007 average level of unauthorized encampments, or the average summer increase in UE (as in some cases the levels are seasonally similar or reduce in summer).

5.5.1 At the regional scale we consider there are no significant differences between the impacts of the four options, as the most important impacts are the positive socio-economic benefits to GTTS of making provision, and as a consequent reduction in potentially adverse consequences of recourse to unauthorised sites (which are common benefits to all four). Consultation feedback pointed out that the draft Assessment in places overstated the potentially negative impacts, especially of Options B to D. Essentially the potential for negative impacts is much more dependent on how provision is made at the local level than the different local levels of provision under the different options.

5.5.2 Note the draft assessments included an allowance for the then unknown level of provision required for Showpeople and for transit use. The top up estimate used has proved sufficient to assess the total scale of all forms of provision noted in this report. The particular issues around the concentration of additional Showpeople pitches required in Hampshire have also been assessed, and do not change the assessment conclusions.

5.5.3 An updated version of the draft SA and HRA are being prepared and will accompany the preferred option report to the Assembly on 4 March 2009.

5.6 Policy content
The wording of the replacement GTTS SE Plan policy will be considered at Assembly on 4 March 2009. The East and South West region GTTS review Panel Reports provide a useful guide of appropriate policy coverage. This informs the outline policy content set out at Annex 5, which RPC are requested to support.

6. Next Steps

6.1 A final decision on the preferred option will be consideration by full Assembly on 4 March 2009, informed by this committee's recommendation.

6.2 Subject to the above and following discussions with Government Office for the South East, GOSE's consultation on the submitted preferred option would commence immediately after the 4 June 2009 elections.

6.3 The onward timetable has not yet been set, but we anticipate Examination in Public around December 2009, publication of the Panel Report Spring 2010, and publication of the final policy around the end of 2010.

Mark Williams
Regional Planner

19 January 2009

Tel: 01483 555218
Email: markwilliams@southeast-ra.gov.uk

Annex A: Statistical analysis of GTTS consultation responses

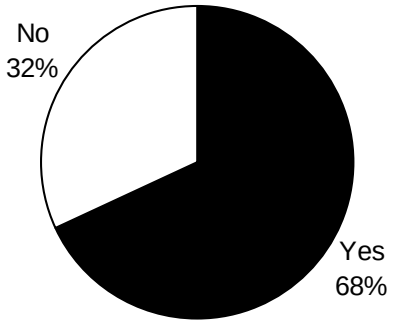
Are you aware that a GTAA has been carried out in your area?

Key

Yes

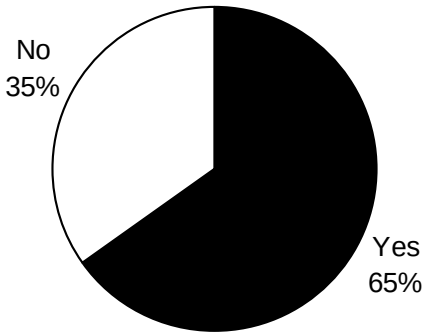
No

All respondents



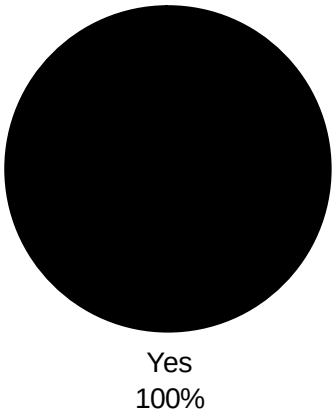
30% no response/no opinion/don't know

GTTS only



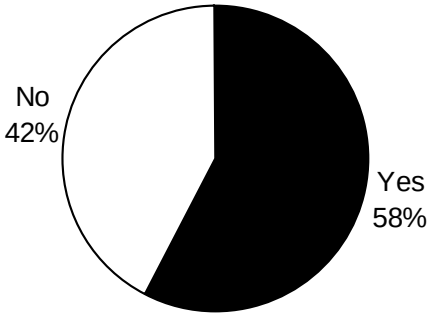
14% no response/no opinion/don't know

SE Councils only



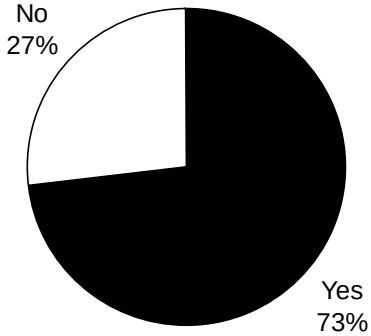
51% no response/no opinion/don't know

Residents only



43% no response/no opinion/don't know

Other stakeholders



36% no response/no opinion/don't know

1.1 Extent of agreement that new provision be shared by all parts of the region including those with little current provision

Key

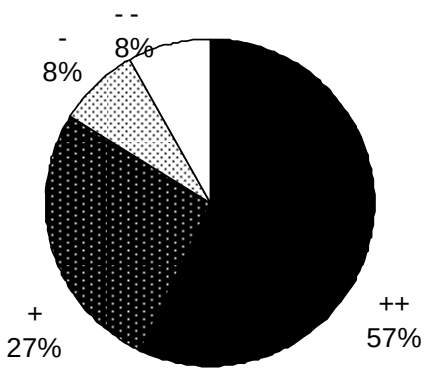
Strongly agree ++

Tend to agree +

Tend to disagree -

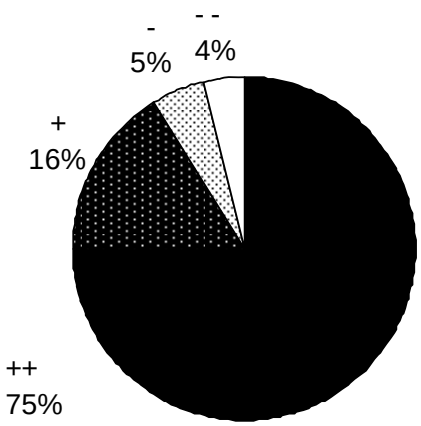
Strongly disagree - -

All respondents



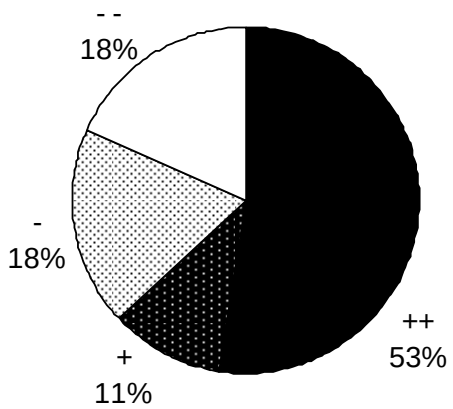
13% no response/no opinion/don't know

GTTS only



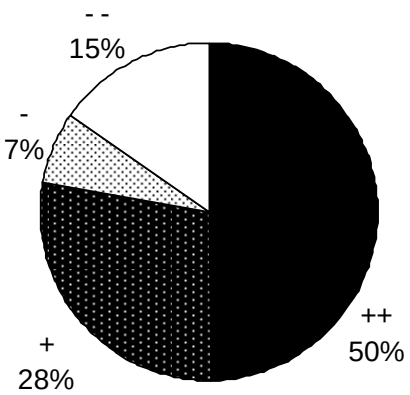
3% no response/no opinion/don't know

SE Councils only



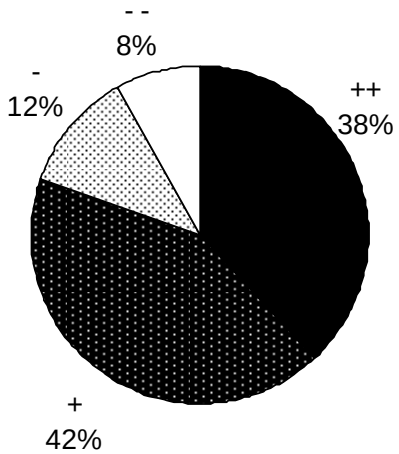
46% no response/no opinion/don't know

Residents only



12% no response/no opinion/don't know

Other stakeholders



17% no response/no opinion/don't know

1.2 Extent of agreement that new provision should only be in locations with good access to employment and services

Key

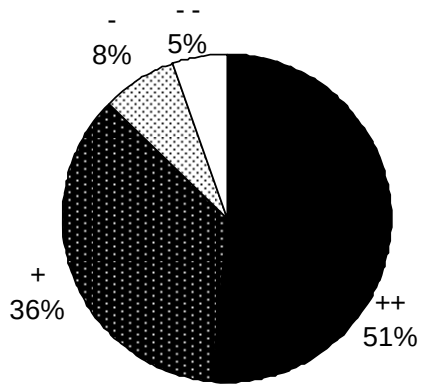
Strongly agree ++

Tend to agree +

Tend to disagree -

Strongly disagree - -

All respondents



13% no response/no opinion/don't know

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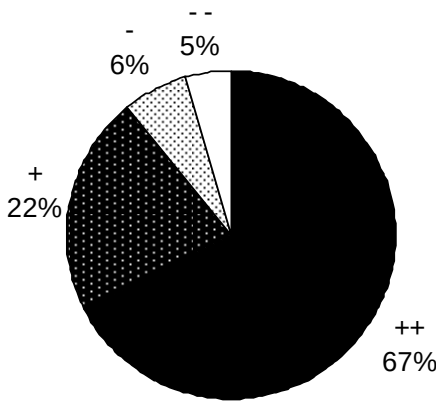

3% no response/no opinion/don't know

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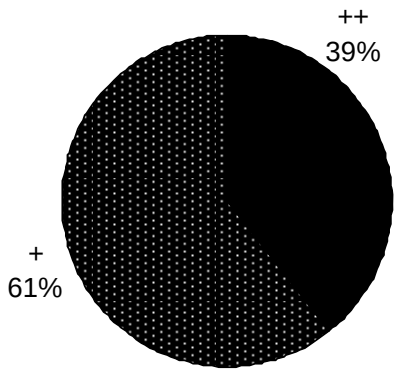

46% no response/no opinion/don't know

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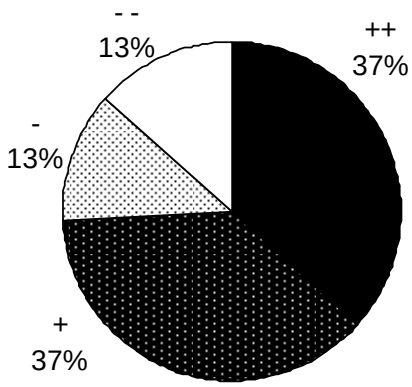
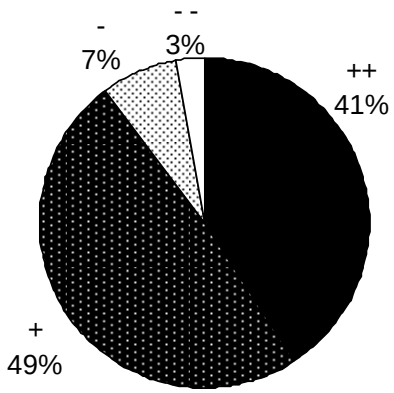


15% no response/no opinion/don't know

Other stakeholders



17% no response/no opinion/don't know

1.3 Extent of agreement that authorised temporary pitches be provided where Gypsies and Travellers often stop while travelling

Key

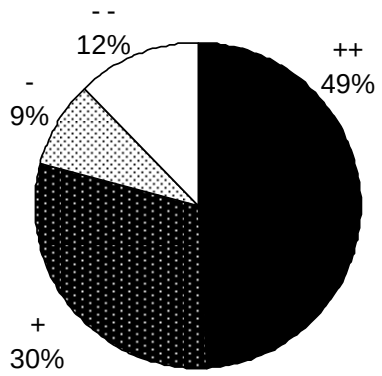
Strongly agree ++

Tend to agree +

Tend to disagree -

Strongly disagree - -

All respondents



15% no response/no opinion/don't know

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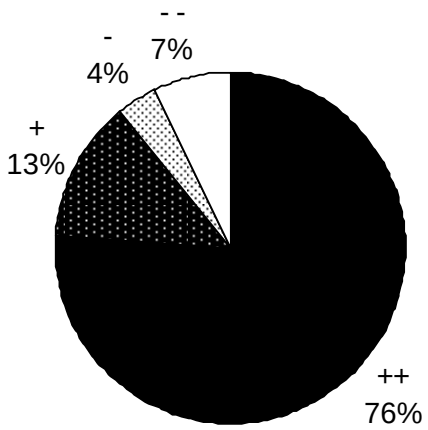

5% no response/no opinion/don't know

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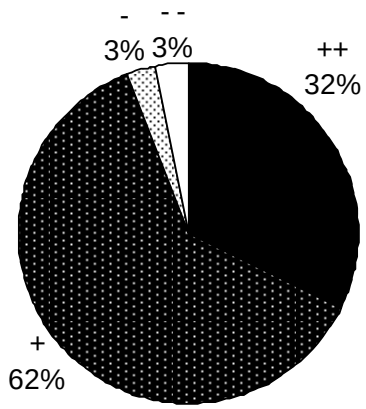
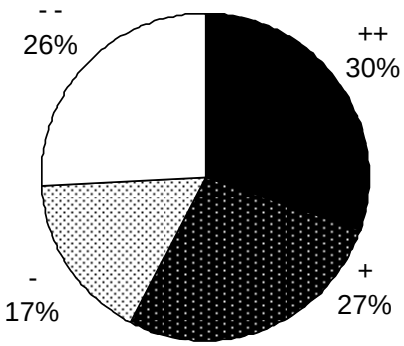


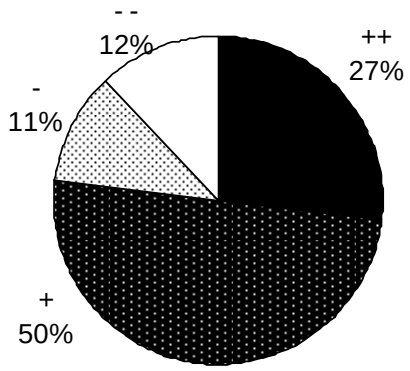
51% no response/no opinion/don't know

Residents only



12% no response/no opinion/don't know

Other stakeholders



19% no response/no opinion/don't know

2. Extent of support for provision of new pitches to reduce unauthorised encampments

Key

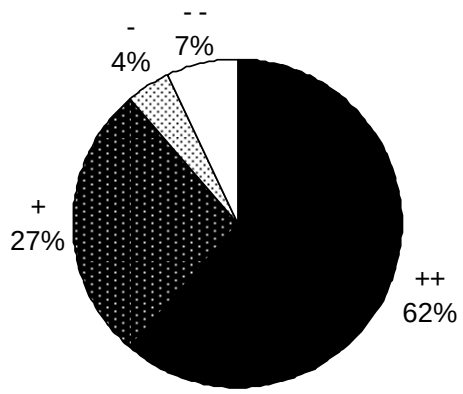
Strongly support ++

Tend to support +

Tend to oppose -

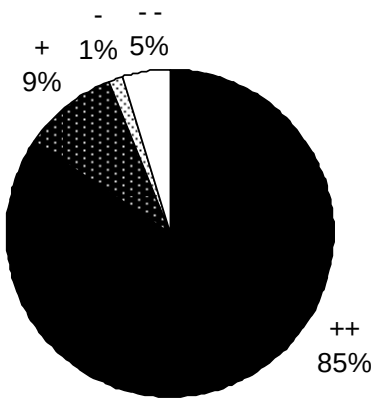
Strongly oppose - -

All respondents



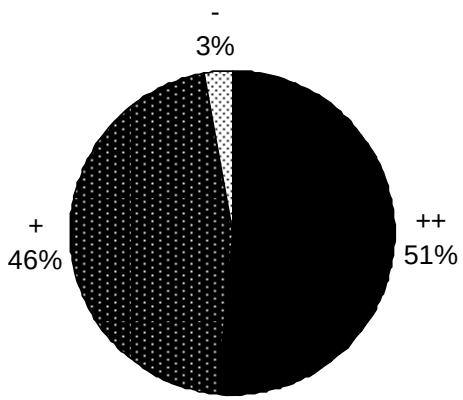
14% no response/no opinion/don't know

GTTS only



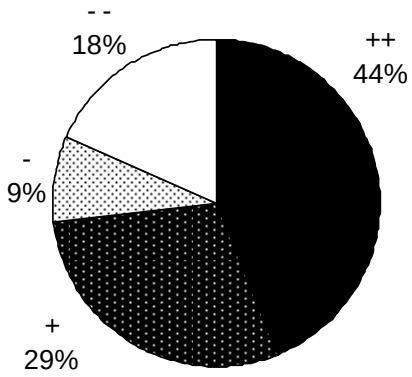
5% no response/no opinion/don't know

SE Councils only



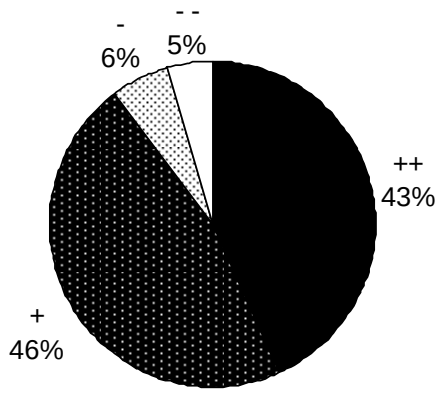
47% no response/no opinion/don't know

Residents only



11% no response/no opinion/don't know

Other stakeholders



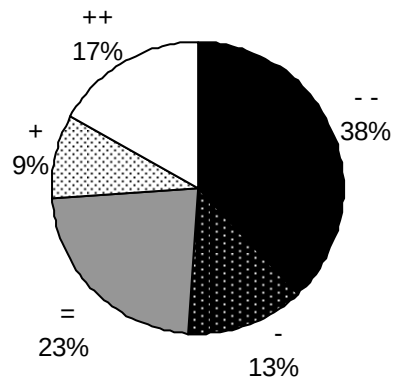
17% no response/no opinion/don't know

3. Views on proposed total regional provision for Gypsies and Travellers (1,064 additional permanent pitches 2006-2016)

Key

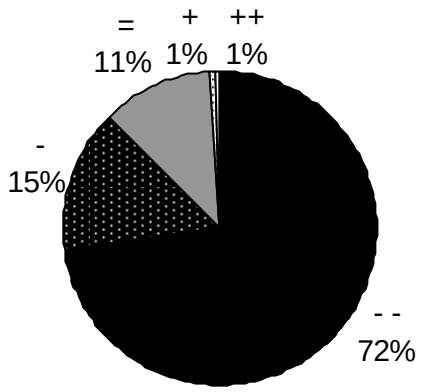
Much too low	- -
A bit low	-
About right	=
A bit high	+
Much too high	++

All respondents



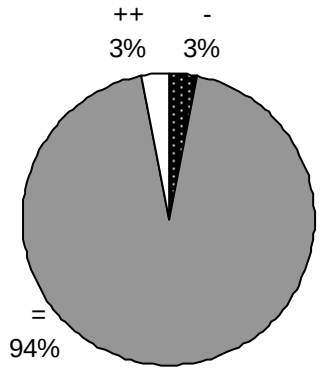
28% no response/no opinion/don't know

GTTS only



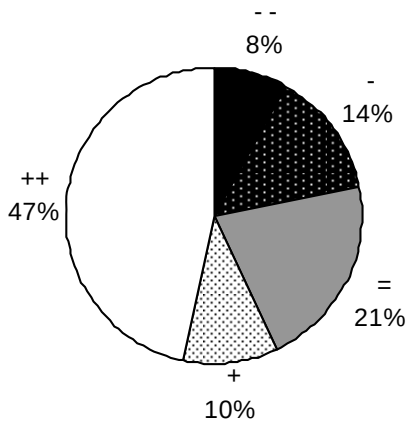
10% no response/no opinion/don't know

SE Councils only



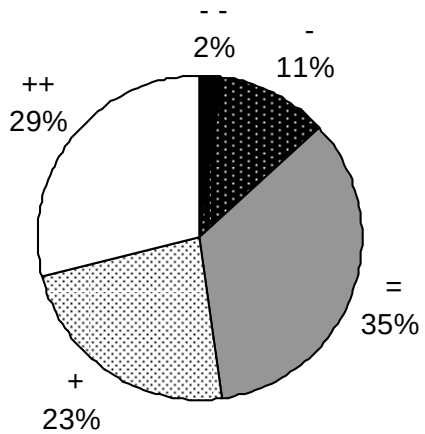
54% no response/no opinion/don't know

Residents only



26% no response/no opinion/don't know

Other stakeholders



45% no response/no opinion/don't know

4. Views on proposed county level provision for Gypsies and Travellers (option A figure)

Key

Much too low - -

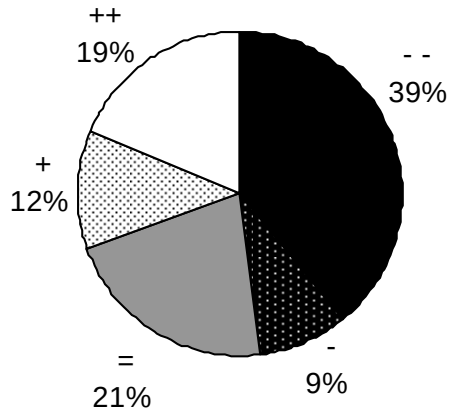
A bit low -

About right =

A bit high +

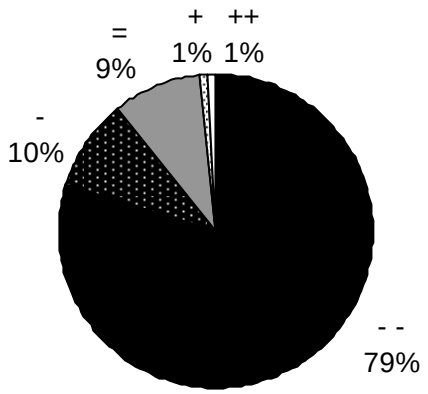
Much too high ++

All respondents



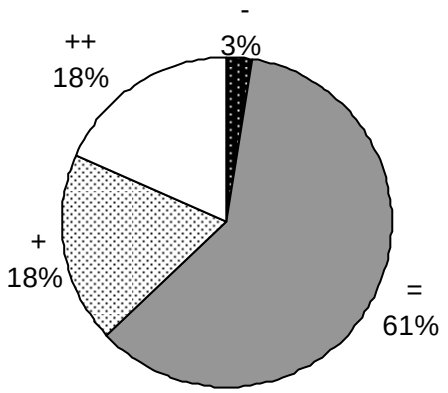
20% no response/no opinion/don't know

GTTS only



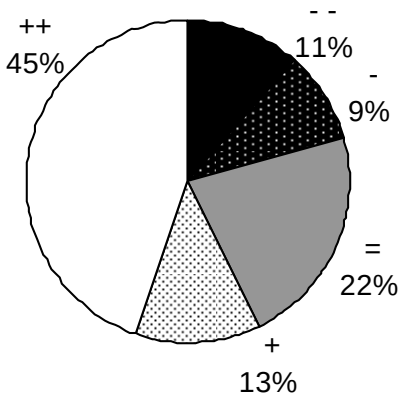
7% no response/no opinion/don't know

SE Councils only



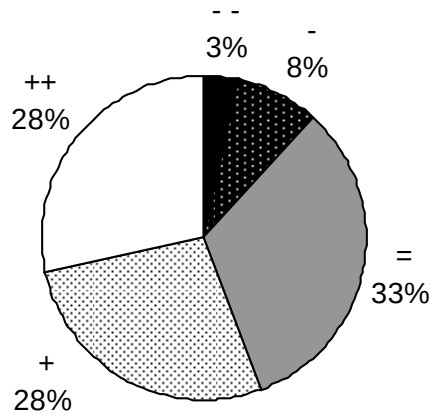
46% no response/no opinion/don't know

Residents only



19% no response/no opinion/don't know

Other stakeholders



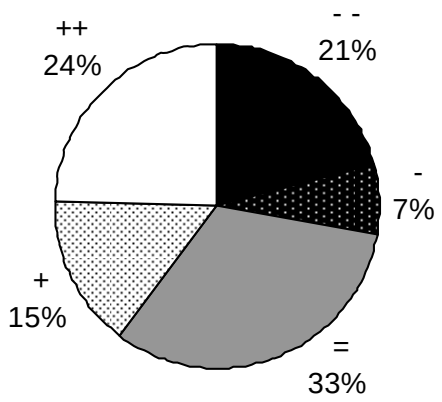
30% no response/no opinion/don't know

5. Views on proposed total regional provision for Travelling Showpeople (up to 274 additional permanent plots 2006-2016)

Key

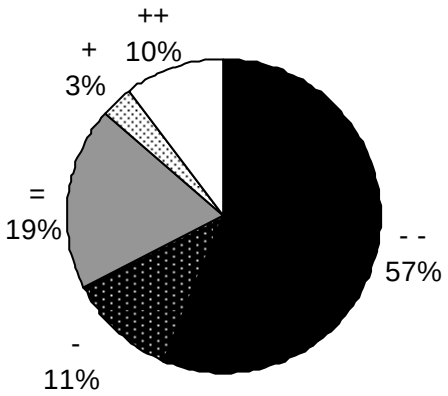
Much too low	- -
A bit low	-
About right	=
A bit high	+
Much too high	++

All respondents



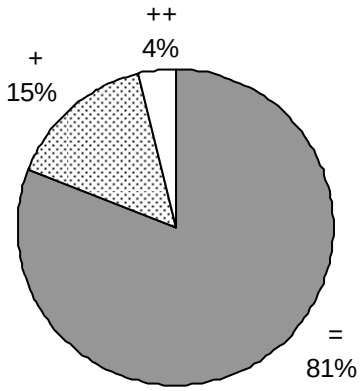
50% no response/no opinion/don't know

GTTS only



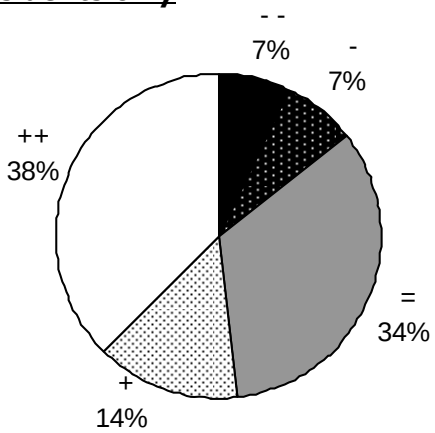
60% no response/no opinion/don't know

SE Councils only



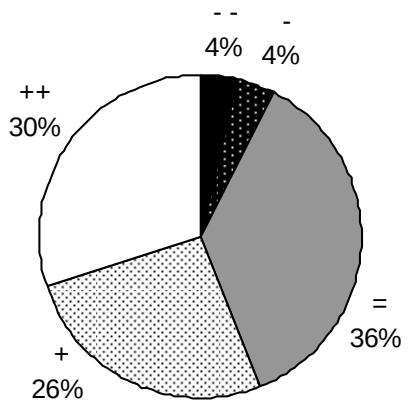
63% no response/no opinion/don't know

Residents only



32% no response/no opinion/don't know

Other stakeholders



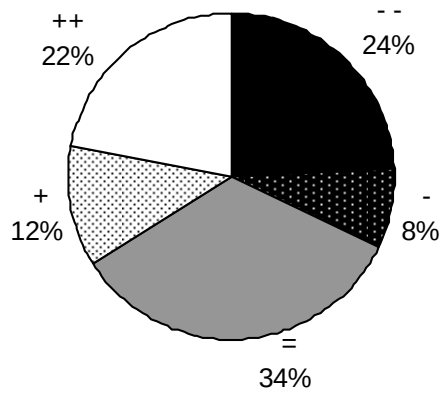
46% no response/no opinion/don't know

6. Views on proposed county level provision for Travelling Showpeople (option A figure)

Key

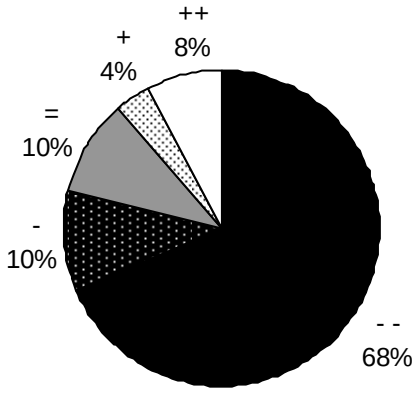
Much too low	- -
A bit low	-
About right	=
A bit high	+
Much too high	++

All respondents



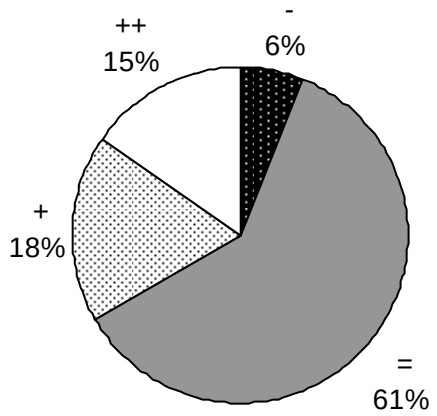
44% no response/no opinion/don't know

GTTS only



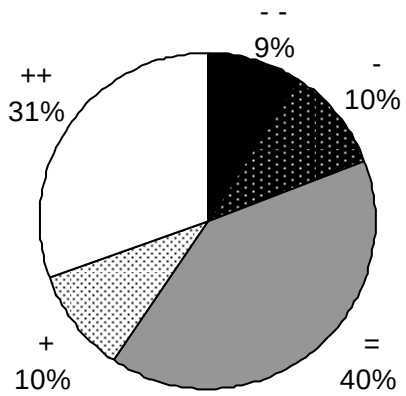
57% no response/no opinion/don't know

SE Councils only



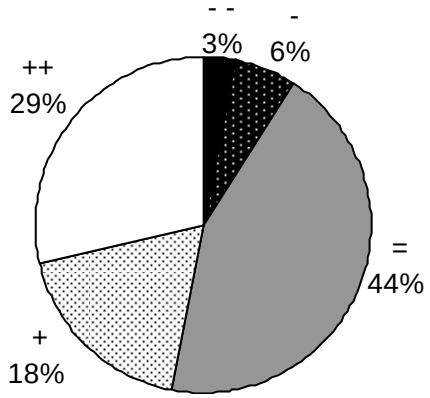
53% no response/no opinion/don't know

Residents only



29% no response/no opinion/don't know

Other stakeholders



36% no response/no opinion/don't know

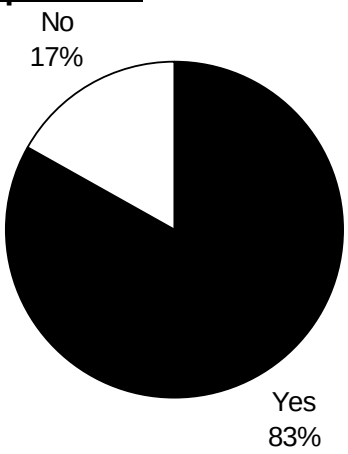
7. Respondent aware of a Gypsy & Traveller site in their area

Key

Yes

No

All respondents



13% no response/no opinion/don't know

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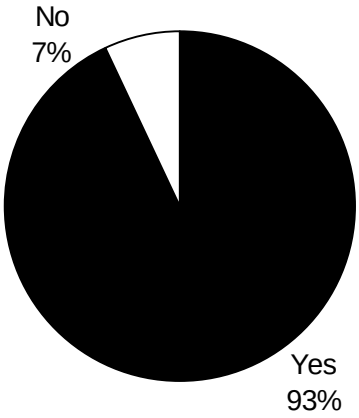
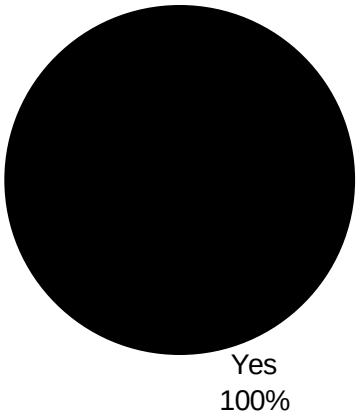


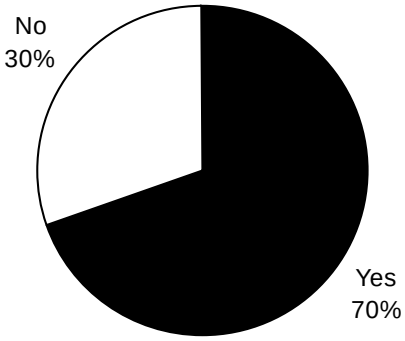
7% no response/no opinion/don't know

SE Councils only



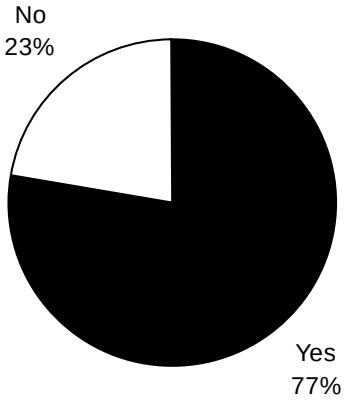
44% no response/no opinion/don't know

Residents only



11% no response/no opinion/don't know

Other stakeholders



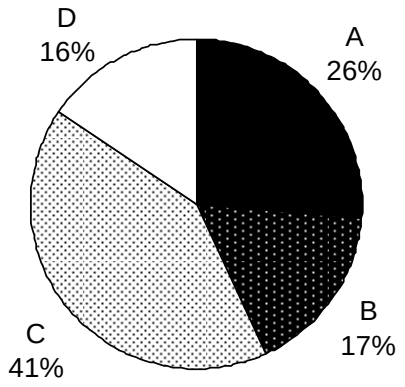
15% no response/no opinion/don't know

8. Preferred distribution option for GTTS provision

Key

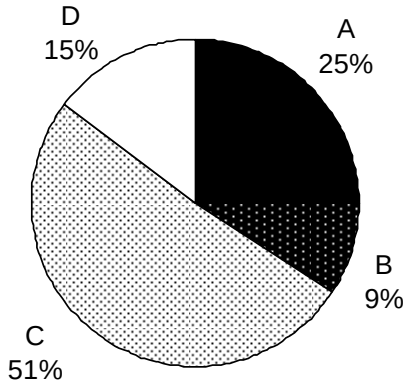
Option A need where arises	A
Option B local/county redistribution	B
Option C greater regional redistribution	C
Option D lesser regional redistribution	D

All respondents



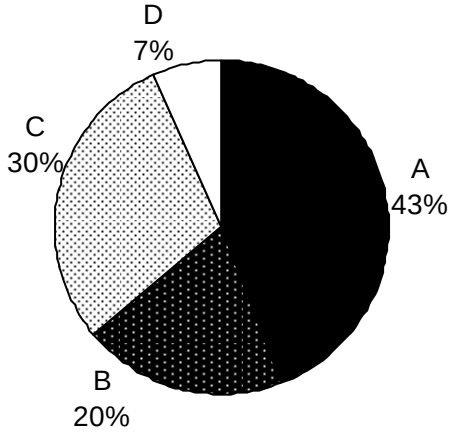
12% no response/no opinion/don't know

GTTS only



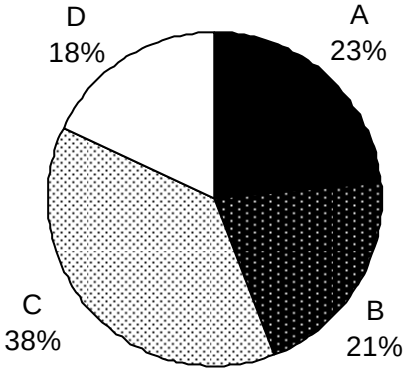
5% no response/no opinion/don't know

SE Councils only



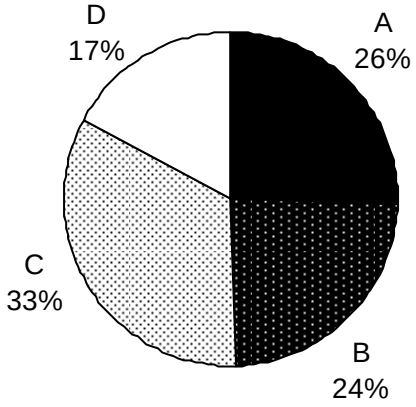
13% no response/no opinion/don't know

Residents only



17% no response/no opinion/don't know

Other stakeholders



16% no response/no opinion/don't know

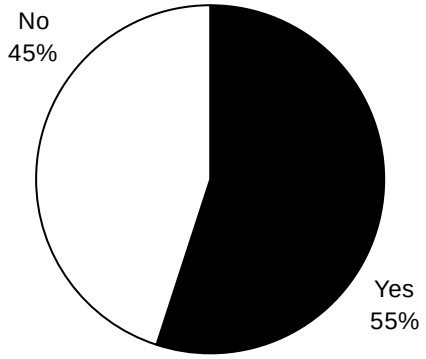
10. Is there a better approach to assessing transit provision needs than use of unauthorised encampment records?

Key

Yes

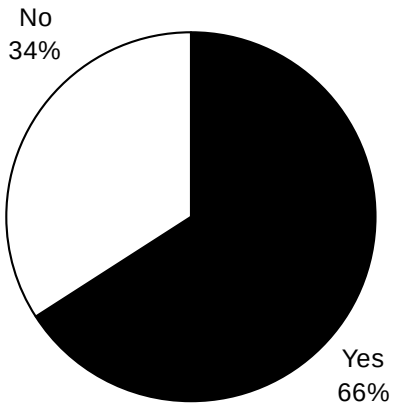
No

All respondents



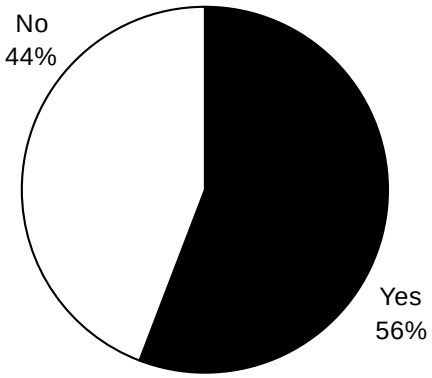
45% no response/no opinion/don't know

GTTS only



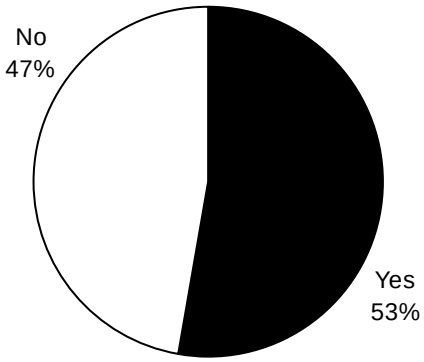
52% no response/no opinion/don't know

SE Councils only



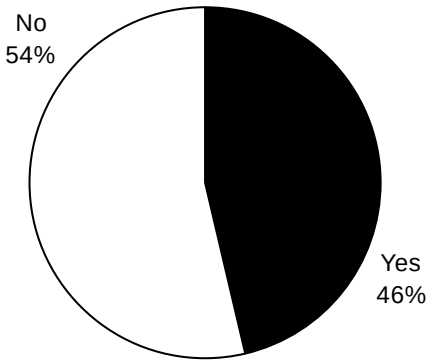
51% no response/no opinion/don't know

Residents only



32% no response/no opinion/don't know

Other stakeholders



42% no response/no opinion/don't know

Annex B: Summary of Consultation Responses – Received by Questionnaire, Online, Letter and Email.

Summary of Responses	Proposed Assembly Response
Qn 3&4. Views on the proposed level of provision for Gypsies and Travellers (regional and county figures)	
• The proposals are about right as they reflect GTAA evidence, is the best information currently available and is compiled with G&T input.	• Noted.
• The assessments are too high and identify aspirations not actual need.	• This is a methodology issue for councils at GTAA stage, and was not identified as a problem in benchmarking
• The proposals are too high, the South East is already over-populated; providing additional sites would encourage either G&T in-migration, or others into this lifestyle.	• Provision will be increased in all regions so should not stimulate migration. The total G&T requirement is a very small fraction of that for standard housing and the SA concludes it can be sustainably accommodated.
• Provision should be much higher or unlimited, and any surplus could be used by non G&Ts.	• The allocations are to meet the needs of specifically defined communities in accordance with Circulars 1/2006 and 4/2007. Criteria-based policies will enable additional provision where justified.
• GTAAs underestimate need as acknowledgement in full would not be politically expedient. The proposed level of provision is a conservative minimum estimate and a number of GTTS noted that they had not been counted in the GTAAs. • Estimates are too low to meet currently unmet need. The level of, and growth rate, in unauthorised sites suggests the situation will get worse as families grow, and assessments may have overlooked or missed 'hidden' G&T in need. Similar general comments were made about all areas at county level.	• The process and methodology is new, and whilst unlikely to be perfect the GTAAs have sought to involved GTTS communities - of necessity by sampling rather than interviewing the full community. Supplemented by local council knowledge, this is the best information currently available to the Assembly. Backlog, unauthorised encampment levels and family growth all form part of the GTAA assessment methodology. Hidden need is by definition unquantifiable - over time as the process delivers those in hidden need may gain the confidence to make their needs known.
• The E Sussex figures, particularly in coastal towns and cities, were criticised as being too low - based on known families in need and families in housing specifying they wish to return to a site. • W Sussex figure does not account for growth and fluctuation in New Traveller population.	• Noted but it is unclear the extent to which this represents additional need or need already assessed in the GTAA
Qn 5&6. Views on the proposed level of provision for Showpeople (regional and county figures)	
• The figures reflect the available evidence, including the needs assessments.	• Noted, although benchmarking has clear limitations.
• Showpeople figures supported except in Thames Valley, but as a minimum and starting level of provision.	• Noted.
• The robustness and completeness of the evidence base, including the GTAA/TSAA methodologies, is not sufficiently clear to draw a conclusion or is considered unsound (i.e. double counting).	• The data is the best currently available.
• The demand for such a high number of sites was questioned in the context of declining and less frequent shows.	• The Guild suggest this is offset by increasing business in other ride/show operations eg corporate/commercial events
• The need element for 42 homeless families is questioned.	• The Showmen's Guild have confirmed that they can provide details of the individual families at issue.

• Unclear of the basis for, or oppose, the Hampshire figures, which are so much higher than elsewhere in total as well as relative to the base population. Further, the level of unauthorised sites in Hampshire is much higher than recorded in the GTAA.	• Total results from Hampshire's own TSAA. Hampshire has a comparatively larger Showpeople population. Compared to other county areas with significant TS populations, Hants apparently has less (offsetting) unused TS pitch capacity and/or greater backlog.
• Due to local shortages, and existing overcrowding, the figures were considered low in a number of areas eg E Sussex, Bracknell, Southampton and Mole Valley.	• Noted but in principle these issues should be taken into account in assessments. The Guild accept the relevant estimates as a minimum staring point.
• Berks and Bucks figures are too low, based on an incorrect high turnover percentage. Using a 1.5% growth net turnover would result in 21 and 33 pitches respectively for 2006-2016.	• Noted. The figures are based on local needs assessments and reflect council advice, the Assembly's agreed basis for provision. In the absence of revised advice this is a technical matter for resolution at Examination in Public.
• A recently completed needs assessment indicates a higher level of provision may be appropriate for Oxfordshire.	• Noted. Advice based on the TSAA results should be submitted.
Qn 8. Comments of preferred distribution option	
• A number of respondents saw Opt A or B being similar and thus supported either, with many of the reasons given being the same. Likewise for Opt C or D.	N/A
• Opt A would allow GTTS to be close to friends and families and it is where there is existing provision to meet their needs, as well as a degree of community integration. GTAA evidence is that most GTTS want to remain locally. Consequently, Opts C&D may not address GTTS wishes and pitches might not be taken up.	• Need evidence is but one of several material planning considerations. All options meet the same level of need. GTAAs struggle methodologically to address need from outside the study borders. The clear majority of GTTS consultation responses support wider redistribution. Redistribution only impacts on a modest proportion of assessed future need. Nor does it inherently require close family groups to disperse or be split up.
• Support a fairer, redistributive approach to improve equality and spatial choice for G&Ts otherwise new provision will be disproportionately concentrated in areas that have made provision in the past - particularly in respect to Kent and Surrey.	• Noted. Consultants results and East of England experience lends support in principle for a degree of redistribution
• Opt A is preferable for TS sites as they tend to travel in large groups and need large sites, making redistribution infeasible.	• The reasoning appears to reflect localised unauthorised encampments experience which is not considered representative. Showpeople tend to seek settled, privately-owned home sites from which to travel to pre-arranged shows.
• Opt A opposed as it reinforces inequities in past provision and there is no evidence to identify if GTTS live where they do by choice or because of constraints to provision elsewhere.	• Noted
• Opt B is based on local sustainability considerations and is the most sustainable.	• Noted. SA indicates little difference between the options' impacts.
• Opt B reflects evidence of need but also provides some choice of location to G&Ts and shares responsibility for provision, including better sharing of the resources/services needed.	• Noted
• Opt C supported as it provides greater choice for GTTS, thus improving access to employment opportunities and other community facilities.	• Noted, the majority of GTTS respondents concur.

• Opt C is more equitable to local authorities (and their residents) that have previously met their obligations to provide for GTTS, helping address past	• Noted. Government seeks that responsibility for provision be shared more widely, but this is one of several material planning considerations.

inconsistencies.	
• Opt D is the most balanced or fair option, allowing security in the existing area (including families able to stay together), but also some opportunity or freedom of choice to move to other areas.	• Noted
• Opts C and D could help avoid ghettos or overcrowding in certain districts, thus reducing problems with the settled community.	• Noted
• Options C&D are not transparent or evidence based and are completely arbitrary. They rely on "normal" spatial planning approaches that are unlikely to be applicable to GTTS (some view option B similarly). In some cases provision is increased where need arising is already high.	• Option C/D methodology was agreed by the Assembly and is set out in a briefing note. The underlying data is from published government sources. The criteria used are relevant environmental / planning considerations for meeting wider housing need, and in all cases no more than a third of locally arising need is reallocated elsewhere. Evidence from this public consultation is that a majority of GTTS favour some redistribution. An approach without agreed criteria that are relevant to planning would be more arbitrary. Redistribution is also based on assessed relative potential to accommodate pitches and wider opportunities for GTTS, not solely shifting provision responsibility from areas of high provision to areas with less.
• For TS, redistribution not supported. Especially for Kent, where it is impractical to redistribute a small number of plots across such a wide area where family groups tend to exceed the size of the allocation.	• Showmans Guild support widening provision in principle, and Showpeople tend to live in private yards in small/immediate family groups.
• A less arbitrary approach is needed to identify where the needs of the 42 homeless showpeople families should be met. Guild suggestion is that the needs should be met where they own the land they were evicted from, not distributed across the region.	• Noted. Eviction follows loss of appeals against refusal of planning permission for unauthorised developments. To do so would essentially reward purchase of inappropriate land.
• Kent CC propose an alternative to their own Option B advice. Further work in progress to resolve and issues with the allocation of Showpeople plots in North & West Kent post 2011 (whole requirement allocated to Dartford).	• Status and extent of constituent district support for revised option B unclear, and no alternative Showpeople allocations submitted, so no specific changes made at this stage. Policy will offer scope to internally redistribute pitch allocations.
• No option supported due to extremity of local constraints justifying no provision / much reduced provision/greater redistribution/ local determination.	• The process requires specific allocations. Requirements are vey small relative to those for housing and no authority is so constrained that any provision is impossible (a conclusion also reached by the Panel for the East of England GTTS review).
Qn 10. Alternative transit provision approaches	
• Include transit or visitor provision on new residential sites.	• Noted, LDF matter. An option for visitor accommodation, but potentially disruptive for residents to accommodate passing G&T strangers.
• Use GTAA information. Where not available, areas concerned should undertake an assessment on a county or sub-regional basis. Further regional research including G&T consultation or a detailed census/count of families was suggested	• The use of GTAA information accords with the proposed consultation approach, Count is to fill gaps. However, there will not be time to undertake additional assessments to inform advice to government.
• Round out Count data with local enforcement, police and TES information, some views Count data is unreliable and volatile.	• This should have formed part of GTAAs as it is part of the statutory duty on LAs to assess need under s.225 of the Housing Act 2004 (see also GTAA guidance para

	22). The detailed information required is most readily available locally and/or via the GTAA process. A range of possible data has been examined regionally (where provided) and found to be very variable in terms of quality, coverage and detail, and found not regionally comparable. A pragmatic way forward is needed, and averaged time-series Caravan Count is at least consistent.ly collected and available
• Each area should have a transit site, especially big towns; or be evenly distributed over the South East.	• Noted, but some correlation with the extent and location of need would be preferable.
• A number of additional data sources were suggested, such as unauthorised encampment records from the police and LAs, waiting list records, TES records, court records or demand from existing transit sites.	• SEERA has already sought police and LA enforcement records to round out Caravan Count data. Response and coverage was partial, and record keeping in different areas was not on a comparable basis and varies in detail and quality. No regionally meaningful conclusions could be drawn. Most areas lack transit sites altogether so cannot monitor demand in use.
• Take into account regional transit/migration patterns or locations where GTTS go to find work.	• Such information would be useful but does not yet exist. Regional research will be considered.
• There was support for a regional strategic provision of transit pitches, however others felt that this should be delegated to the county or sub-regional level.	• Noted. A way forward is proposed that combines elements of both.
• The emphasis should be on permanent residential provision to reduce transit site need, rather than the provision of transit sites.	• To meet the requirements of Circular 1/2006, transit provision also needs to be addressed - there is need for both.
Qn 11. Other needs not accounted for.	
• Housed G&Ts are difficult to identify and thus their needs may not be fully reflected.	• Noted, a difficulty for all GTAAs with no obvious retrospective solution. For currently housed G&Ts wanting a pitch, to some extent this may also be an issue of preference rather than need.
• Hidden travellers.	• Unquantifiable.
• European Gypsies.	• If permanently resident in the UK this should in theory be picked up in GTAAs.
• G&Ts with horses and wagons, with specific needs for horses.	• Should be accounted for numerically in GTAAs. The specific nature and location of local provision is an LDF matter.
• New age travellers, need a network of temporary stopping places suitable to alternative lifestyles (i.e. not concrete sites).	• In theory should be accounted for in GTAAs, but it is difficulty to know the extent to which their needs have been identified. New Travellers were not included in Caravan Count data until mid 2007. To an extent transit/stopping places may meet some of any need un-quantified, if in suitable locations.

Qn 12. Comments on SEA / AA	
• Each option has not been assessed on its own merits, casting doubts that the SA meets the statutory requirements.	• The SA meets the statutory requirements. The focus of the assessment on variations between the options is reasonable. However, the presentation of the options has been changed to provide more clarity.
• The presentation of Options B to D against Option A, rather than on its merits, is confusing and potentially misleading as it gives the impression that the impacts of these options are neutral/negative in absolute terms.	• The presentation of the options has been changed to provide more clarity. The assessments of Options B to D are presented on their own merits.
• Options B to D should provide a more sustainable distribution that takes account of a wider range of social, economic and environmental considerations than Option A. This is not reflected in the SA.	• The assessments have been reviewed addressing the overstatement of some negative impacts for Options B to D. It is considered that at a regional scale there are no significant differences between the impacts of the four options. In particular, the impacts of Option B with new sites in the same general areas to where GTTS currently live, should be very similar to those of Option A. Potential negative impacts depend on implementation at the local level.
• A re-consideration and further investigations concerning the impact on the fear of crime is necessary.	• The contradictions related to the impacts on fear of crime and the inaccurate recommendations have been addressed.
• The SA and HRA should have considered the in-combination effects of the SE Plan (housing numbers) and the four options for GTTS to highlight potential discrepancies between the options.	• The GTTS assessment is essentially supplementary to that undertaken for the draft South East Plan Appropriate Assessment, and its conclusions. When undertaking this work it was intended to be implicit that the Gypsy & Traveller allocations were within the existing context of the draft South East Plan housing allocations/other policies, and its Appropriate Assessment (including the list of other plans or projects which had already been considered in the core document Appropriate Assessment). For clarification, the final version of the report should be amended to make this more explicit.
• It is questionable that in areas with European sites (e.g. the Thames Basin Heath SPA) harm to such sites and its biodiversity can be ruled out.	• This is a matter for the identification of GTTS sites at local level. Individual sites which are considered unsuitable in a local HRA will not be allocated for GTTS sites.
• The SA concludes for Options B and C that a more in depth HRA may be required. This means that environmental constraints have not been adequately reflected.	• The HRA Screening concludes that at a regional scale no option would lead to a significant adverse effect on European sites. The recommendation concerning the SA Objective on biodiversity has been amended to clarify that it is explicitly referring to more in depth HRA at local level.
• There are other environmental considerations that need to be taken into consideration, such as the provision of foul drainage infrastructure.	• This is a matter for the identification of GTTS sites at local level.
• The SA should include an explicit assumption against sites in Flood Zones 2 and 3.	• The recommendation concerning the SA Objective on flooding has been amended accordingly.
• It has to be recognised that different ethnic groups will not want to live on the same sites.	• The recognition of the distinctions between the sub groups within the different GTTS communities is included as a recommendation concerning the SA Objective on vibrant communities (Table 6.8).

• The SA omits assessing the impact of the Showpeople proposals.	• In the light of a lack of data an appropriate general allowance was made for Showpeople (and transit) requirements . As further data are now available the SA has been amended accordingly.
• The SA includes errors concerning figures from the CLG Caravan Count 2006 and the water supply situation within some districts.	• The errors have been corrected.
• Various individual locations/areas are unsuitable for GTTS sites or require further investigation.	• This is a matter for the identification of GTTS sites at local level.
Qn 13. Other comments	
• Recognition of the Gypsy way of life and identifying sites will improve community cohesion, however it is important that decision-makers are resolved to deal with any opposition.	• Noted.
• Gypsies should be encouraged to integrate into wider society, adopting a settled lifestyle. Possibly being put into social housing.	• Those that wish to travel have a legally recognised human right to do so and to live in caravans/trailers.
• Building more sites could also free up Council houses occupied by GTTS who would prefer a site.	• Noted
• Some G&Ts would prefer to live on their own land rather than council sites and there should be help for GTTS to buy land themselves.	• Noted
• There should be greater flexibility for genuine applications, including allowing unobtrusive sites with landowners consent or the ceasement of enforcement action until 60% of new pitches are provided.	• Noted. A local authority implementation matter
• Any outcome should reduce illegal parking and ensure swift action if illegal camps are set up, ending the contradiction of planning laws.	• Not a regional matter
• Underused sites should first be identified and considered before new sites are developed. Alternatively, some felt that sites should not be too large, which would help integration/community relations.	• A local implementation issue, but GTTS preferences for smaller (and hence more) sites also need to be considered. Also existing sites may not correspond with the location of need.
• Different GTTS and families have different needs and often don't get on.	• Noted.
• It was commented that sites should not be in the Green Belt and/or sparsely populated, small rural communities.	• No area is in principle 'unsuitable' for GTTS provided it is suitable in principle for general residential use. Greenbelt exception sites may be justifiable.
• There were also a number of comments made that were site specific, or an issue raised that was more appropriate for implementation stage (e.g. putting pitches in housing developments, ensuring sites are safe, well maintained and managed to reduce problems (with local management groups set up, with GTTS representatives), with adequate on site infrastructure being provided and being located away from areas such as flood plains, motorways, dumps etc).	• Noted. For the most part these are a combination of site managements and LDF implementation issues to be addressed locally. Those of regional significance for implementation can be considered in policy wording.
• There should be a review of the policy in 5 years.	• Periodic review is an RSS requirement, precise timing will need to be determined alongside the timetable for the review or replacement of the emerging RSS.
• LDF good practice guide in planning for GTTS accommodation would be useful.	• Noted. CLG have published site (design) guidance. The following may also be useful: *Providing Gypsy and Traveller sites: contentious spaces* (Joseph Rowntree 2007)

Annex C: Recommended preferred option D pitch allocations[1]

(net additional permanent residential pitches 2006-2016)

County grouping and Authority	G&T Option D	TS Option D
Berkshire	77	12
Buckinghamshire MK	114	26
East Sussex	55	9
Hampshire IoW [2, 3]	143	119
Kent [4, 5]	290	26
Oxfordshire [6]	62	17
Surrey	146	53
West Sussex	177	14
SOUTH EAST	**1,064**	**276**
Bracknell Forest	15	2
Reading	7	2
Slough	7	1
West Berkshire	18	3
Windsor and Maidenhead	9	2
Wokingham	21	2
Berkshire	**77**	**12**
Aylesbury Vale	39	5
Chiltern	9	16
Milton Keynes	36	3
South Bucks	15	1
Wycombe	15	1
Buckinghamshire and MK	**114**	**26**
Brighton and Hove	13	2
Eastbourne	3	1
Hastings	2	1
Lewes	10	1
Rother	7	1
Wealden	20	3
East Sussex B&H	**55**	**9**

Continued…

County grouping and Authority	G&T Option D	TS Option D
Basingstoke and Deane	11	17
East Hampshire	6	11
Eastleigh	4	6
Fareham	4	5
Gosport	2	3
Hart	13	8
Havant	4	5
Isle of Wight [3]	27	0
New Forest	9	11
Portsmouth City	10	7
Rushmoor	2	4
Southampton City	12	9
Test Valley	18	17
Winchester	21	16
Hampshire and IoW	**143**	**119[2]**
Ashford	30	2
Canterbury	30	3
Dartford [5]	22	6
Dover	23	2
Gravesham	12	1
Maidstone	35	2
Medway	30	2
Sevenoaks	19	1
Shepway	12	1
Swale	28	2
Thanet	17	2
Tonbridge and Malling	18	1
Tunbridge Wells	14	1
Kent and Medway	**290[4,]**	**26[5]**
Cherwell	15	5
Oxford City	9	1
South Oxfordshire	12	4
Vale of the White Horse	12	3
West Oxfordshire	14	4
Oxfordshire	**62**	**17[6]**

Continued…

County grouping and Authority	G&T Option D	TS Option D
Elmbridge	12	3
Epsom & Ewell	6	1
Guildford	27	12
Mole Valley	7	1
Reigate & Banstead	9	4
Runnymede	10	10
Spelthorne	8	6
Surrey Heath	16	8
Tandridge	8	4
Waverley	33	3
Woking	10	1
Surrey	**146**	**53**
Adur	15	0
Arun	17	2
Chichester	54	3
Crawley	19	1
Horsham	50	5
Mid Sussex	20	2
Worthing	2	1
West Sussex	**177**	**14**

Notes.

1. District/unitary figures vary slightly from Option D as consulted upon, due to updating of underlying redistribution criterion data.
2. Hampshire has not agreed a distribution of need arising for Showpeople. A default has been calculated using the redistribution methodology.
3. Figures for the Isle of Wight are held constant to need arising throughout.
4. G&T Figures for Kent authorities reflect January 2008 advice. A revised Option B distribution was proposed by Kent CC in the consultation, supported by some Kent districts. If confirmed as agreed replacement advice the revised figures can be incorporated. This would alter the Option D G&T distribution in Kent.
5. The Dartford Showpeople allocation contains the entire post 2011 requirement for North and East Kent. This should be adjusted by agreement between the authorities concerned.
6. Oxfordshire Showpeople figures do not yet reflect their recent TSAA as councillors have yet to consider it and offer formal advice. The TSAA indicates need for 33 Showpeople pitches 2006-2016 rather than 7 (the allocation of 17 includes inward redistribution). If 33 were agreed this could slightly increase Showpeople allocations elsewhere, via the redistribution methodology.

Annex D: County-Group Transit Provision Requirements

County Group	Pitches	Caravans	Comments
Berkshire	***12***	***20***	Caravan Count estimate using the average number of unauthorised encampment caravans (20)
Buckinghamshire MK	***8***	***14***	Caravan Count estimate based on the average summer increase in number of caravans in unauthorised encampments (14)
East Sussex B&H	32	60	Advice & GTAA. Includes provision in Brighton and Hove that council advises to be already met, and one or two further sites in coastal East Sussex. (***Using Count***: ***35p/60c***)
Hampshire IoW	41	77	Advice & GTAA.. A permanent transit site in each of S, N & W Hampshire subgroups. Further consideration to need on the Isle of Wight and for a network of emergency stopping places. (***Using Count***: ***45p/70c***)
Kent	41	70	Advice & GTAA. Small sites (4 pitches, 7 caravans) in Tonbridge & Malling, Dartford, Gravesend and Dover. Medium sites (8-9 pitches, 14-15 caravans) in Swale, Sevenoaks and Canterbury. Advice includes permanent transit sites, seasonal and emergency stopping places. (***Using Count***: ***29p/50c***)
Oxfordshire	***10***	***17***	Caravan Count estimate using the average number of unauthorised encampment caravans (17)
Surrey	***8***	***13***	Caravan Count estimate based on the average summer increase in number of caravans in unauthorised encampments (13)
West Sussex	25	42	Advice & GTAA. Need focused on Crawley, Horsham & Mid Sussex and main routes. GTAA identifies potential but low transit need in southern Chichester district. (***Using Count***: ***25p/42c***)
South East	**177**	**313**	One pitch per 1.7 caravans assumed

Notes

Caravan Count estimates ***in bold italics*** are the **higher of** the 2004-2007 (8-count) average of: **overall unauthorised encampments,** or **summer increase in UE.**

One pitch per household assumed for need identified in advice in terms of numbers of households.

Where advice on need was expressed as a range, midpoint used. Minority report positions ignored.

Annex E: Outline of matters to be covered in Policy and supporting text

- Tabulated pitch provision requirements, to district/unitary for permanent provision, to county-group level for transit/stopping places.

- That provision be planned-for and enabled through LDFs ie site allocations rather than primarily through criteria-based policies.

- Promotion of joint LDDs and flexibility to groups of councils to thereby redeploy their combined allocations.

- Local studies required to refine transit requirements

- Brief implementation/delivery guidance eg exception sites, s106, alongside new housing development, with access to jobs and services, GTTS preference for smaller sites, cross-reference to CLG site design guidance.

- Monitoring requirements: Net additional residential and transit pitches both permanent and temporary permissions (both Core Output Indicators), details of unauthorised developments and encampments incidents (recommended by the East of England Panel). We are minded to initiate this from 1 April 2009.

- That delivery is urgent and allocations include a significant element of backlog.

- Indicative guidance beyond 2016 for longer term LDF planning (eg onward 3% compound growth)

- Support for local delivery steering groups including GTTS representatives.

- Indicative date for the next review (provisionally another single topic review following the review or replacement of the emerging RSS).

- Intention that there be greater coordination and consistency of timing and approach in the next round of GTAAs.