



PARTIAL REVIEW OF THE REGIONAL SPATIAL STRATEGY FOR THE SOUTH EAST

Provision for Gypsies, Travellers and Travelling Showpeople

**Recommendations for
new policy H7**

June 2009

The South East England Regional Assembly was dissolved on Tuesday 31 March 2009 and replaced by a Partnership Board comprising members of South East England Councils and the South East England Development Agency.

For more information see www.southeast-ra.gov.uk

The content of this document was agreed by the Assembly on Wednesday 4 March and it has been published by the South East England Partnership Board.

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PARTIAL REVIEW OF THE REGIONAL SPATIAL STRATEGY FOR THE SOUTH EAST

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1. Introduction

- 1.1 This submission contains the South East England Regional Assembly's recommendations on the provision of new pitches for Gypsies, Travellers and Travelling Showpeople (GTTS) in the South East.
- 1.2 These recommendations were formally agreed by the full Assembly on Wednesday 4 March 2009 and are set out as new Policy H7 in Section 4 of this document.
- 1.3 The Government will run consultation from Monday 8 June to Friday 28 August 2009. All comments should be sent to the address below to arrive no later than 28 August 2009:

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- 1.4 Section 2 summarises our recommendations. Section 5 explains how they were developed. Annex A details who and how we have consulted in coming to our recommendations, and how that feedback has helped us formulate them.
- 1.5 Accompanying this submission document are two technical reports that have also informed our advice, the Sustainability Appraisal and Habitats Regulations screening report. Both are also available on the Assembly's website¹, alongside a wide range of supporting and background material.

2. Summary

- 2.1 This document is the product of a single issue review of the South East Plan, the Regional Spatial Strategy for the South East. The review was initiated in response to publication of Government guidance² requiring that Regional Spatial Strategies address the accommodation requirements of Gypsies and Travellers. Guidance states that we should identify the number of caravan pitches each local planning authority should provide (but **not** their location) and identify suitable land on which to accommodate them. This process takes account of Gypsy and Traveller Accommodation Assessments produced by our local authorities, and a strategic view of needs across the region.
- 2.2 This guidance seeks to reverse under-provision for GTTS in recent decades, and thereby to reduce unauthorised sites and the tensions they can cause with other residents. In the South East 22% of GTTS caravans have no authorised place to stop, and their occupants are therefore legally homeless. Gypsies and Irish Travellers already fare the worst of any British ethnic group in terms of health and education. The shortage of authorised sites makes it more difficult for an already socially-excluded and discriminated-against part of the community to access employment, health care, education and other services.
- 2.3 To address their needs for the period 2006-2016 we recommend that an additional 1,064 permanent residential pitches are provided for Gypsies and Travellers, and a further 302 for Travelling Showpeople. Taken together, the average local authority in the South East will need to find suitable land for 20 pitches, although individual requirements vary. This represents around 0.5% of the equivalent

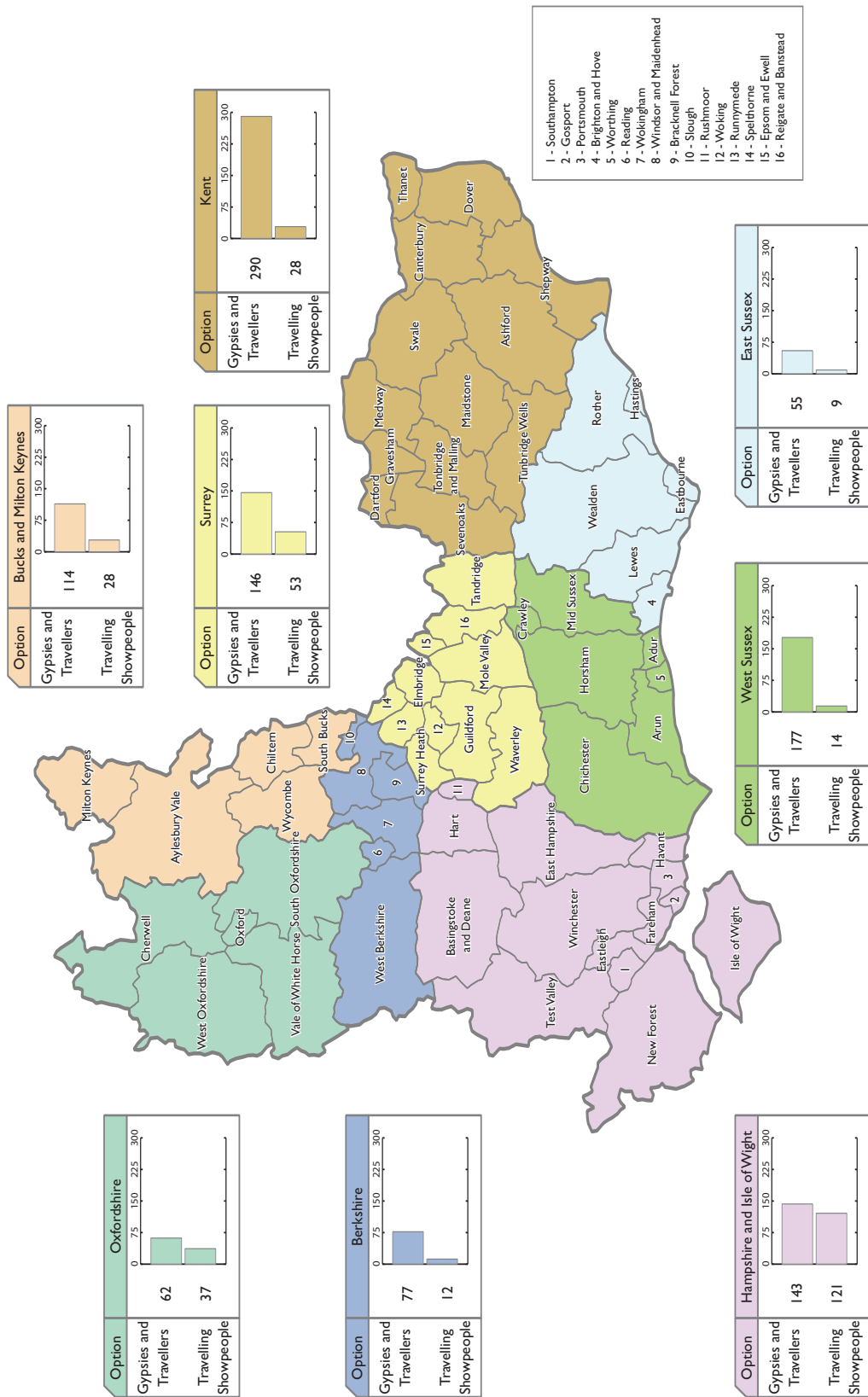
FOOTNOTES

¹ Currently www.southeast-ra.gov.uk/sep_gtts.html.

² *Planning Circulars 01/2006 Planning for Gypsy and Traveller Caravan Sites (CLG February 2006), and 04/2007 Planning for Travelling Showpeople (CLG August 2007).*

FIGURE 1

Gypsy and Traveller and Travelling Showpeople Provision in the South East 2006-2016



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requirements for standard housing in the same period. The recommended approach includes a modest element of regional redistribution to widen opportunities for GTTS in areas with limited current provision, and thereby to improve delivery by broadening responsibility for new pitch provision.

- 2.4** These requirements are illustrated by county group in Figure 1, and tabulated by local authority within the proposed new Policy H7 in Section 3 of this document. This will replace an interim statement on provision for Gypsies and Travellers in the draft South East Plan. In addition, councils will need to locally assess the demand for temporary stopping places for use by Gypsies and Travellers while travelling (such as transit site pitches), and identify suitable locations for them.

3. Next steps

- 3.1** The proposals in this document will be tested at an Examination in Public chaired by an independent planning inspector, scheduled to run from Tuesday 2 to Friday 5 February 2010. Responses to the Government-run consultation will help the planning inspectors identify issues for exploration at the examination. Dates for preparatory meetings and other examination information and resources will be published on the Planning Inspectorate website³.

4. New policy H7 and supporting text

Provision for Gypsies, Travellers and Travelling Showpeople⁴

- 4.1** The South East is home to around a fifth of England's GTTS. Most tend to live fairly settled lives, often alongside other residents both on authorised caravan sites and Showpeople's yards, and in housing. However, due to a combination of a growing GTTS population and the lack of new sites provided in the last two decades, delivery of new pitches has become a national priority. In the South East 22% of GTTS caravans have no authorised place to stop, so their occupants are legally homeless. The shortage of authorised sites makes it more difficult for an already socially-excluded part of the community to access employment, health care, education and other services.

- 4.2** The level of proposed provision is derived from survey-based needs assessments carried out by local authorities in consultation with GTTS communities, and advice from local authorities on how the assessments should be interpreted for their areas⁵. GTTS reside in and move through all parts of the South East, with local concentrations of Gypsies and Travellers in Kent and Surrey, and of Travelling Showpeople in Hampshire and Surrey. The pitch allocations mostly reflect historic GTTS settlement patterns, but a quarter of the total requirement has been regionally redistributed to widen opportunities where provision is currently limited⁶.

FOOTNOTES

³ www.planning-inspectorate.gov.uk/pins/rss/south_east_g&t.

⁴ As defined in Circulars 1/2006 Planning for Gypsy and Traveller Caravan Sites and 4/2007 Planning for Travelling Showpeople respectively.

⁵ Factors taken into account include family and population growth; the existence of unauthorised sites; current pitch supply, turnover and overcrowding; and where available migration intentions and transfer to and from pitches and other forms of accommodation.

⁶ Redistribution takes broad account of relative access to opportunities including services and employment, and the relative extent of potentially developable land. In practice this generally (but not always) tends to modestly increase requirements in areas where current provision is relatively low. An element of redistribution was strongly supported by both GTTS and South East residents.



4.3 The combined requirements of this policy will provide for an increase in authorised pitch numbers of two-thirds by 2016, but the extent of backlog means there is an immediate need to provide additional pitches. This is both a significant step forward and a delivery challenge, although the total requirement is modest at around 20 pitches or 0.5 hectares per local planning authority (0.5% of the land-take for housing). At current costs and funding levels Gypsy and Traveller Site Grant is unlikely to enable more than a third of the residential pitches required. Regional partners, councils and the GTTS community will need to work together to ensure effective delivery. Allocations will be updated following a regional review of GTTS provision starting in 2011-12. Where Local Development Documents (LDDs) look beyond 2016, onward requirements can be calculated on the basis of 3% compound growth for Gypsies and Travellers and 1.5% for Travelling Showpeople⁷.

4.4 The Homes and Communities Agency has an important role in improving value for money in public pitch provision and greater involvement by registered affordable housing providers, including consideration of the potential of intermediate tenures, is desirable. Publicly-funded Gypsy and Traveller pitches count as affordable housing and provision

via Section 106 legal agreement or by developers within new developments is encouraged. However, the primary means of delivery will be through local authority development control powers and the identification of suitable, available and viably developable land through LDDs, for take-up by GTTS otherwise able to provide for themselves.

4.5 The siting, scale and design of new GTTS sites⁸ is a matter for local authorities in consultation with GTTS, noting their expressed preference to live in reasonable proximity to services and employment opportunities, and to live on smaller sites in family groups. Collaborative working between councils is encouraged. Where formally agreed between the councils concerned and set out in their LDDs, allocations may be combined and redistributed between partner authorities where it would improve delivery outcomes. In principle, pitches could be provided on any land that is allocated or suitable for residential development, or capable of being made so. Where land availability poses significant constraints and there are no suitable, viable and deliverable alternatives, unmet GTTS need may constitute exceptional circumstances that could justify relaxation of Green Belt policy or use of sites within protective designations such as Areas of Outstanding Natural Beauty.

FOOTNOTES

⁷ Both figures are growth net of pitch turnover, to be calculated from the sum of the 2006 pitch baseline and the full 2006-2016 allocation, compounded annually.

⁸ See Circulars 1/2006 and 4/2007; and the *Designing Gypsy and Traveller Sites Good Practice Guide (CLG 2008)*. The following may also be helpful: *Travelling Showpeople's Sites – A Planning Focus (Showmen's Guild of Great Britain, 2007)*.

4.6 Travelling for both work and cultural reasons remains an important part of GTTS lifestyles. An increase in suitable, authorised stopping places is also a high priority and is important to improve relations between settled and travelling communities. The evidence currently available⁹ at regional level is insufficiently robust to provide transit allocations for individual planning authorities. Councils working together on a county-group basis should take immediate steps to compile and assess all available local indicators of transit need. This is for consideration alongside regional evidence to identify and provide the appropriate quantity, form and distribution of transit and emergency-stopping places. As a starting point Table H7b provides county-group data on unauthorised encampments and where available a summary of transit commentary from local authority needs assessments. A regional transit study will examine travelling patterns and high-level evidence of transit need.

4.7 Regional partners and local authorities will monitor pitch permissions and completions and progress on site-specific LDD allocations, to track progress and improve the evidence base for LDDs and the next regional review. Monitoring will differentiate between residential pitch and transit provision, between affordable and private provision and between provision for Gypsies and Travellers and for Travelling Showpeople. Temporary permissions should be noted separately. Councils that do not already do so should instigate robust monitoring of unauthorised developments and unauthorised encampments, noting the number of caravans and collating time-series data co-ordinated with CLG Caravan Count recording. Collection of data about travelling groups is desirable, including home/origin, destination and if applicable their preferred area for permanent provision.

**POLICY H7:
PROVISION FOR GYPSIES, TRAVELLERS
AND TRAVELLING SHOWPEOPLE**

Local Planning Authorities will make provision in Local Development Documents to deliver 1,064 net additional permanent residential pitches for Gypsies and Travellers in the period 2006-2016, and 302 for Travelling Showpeople, as set out in Table H7a which details pitch requirements by local authority. Local Planning Authorities will also make appropriate provision in Local Development Documents to meet requirements for transit and temporary stopping purposes.

FOOTNOTES

⁹ *Not addressed in half the region's GTAA's. Other sources considered include CLG Caravan Count, and where available and provided, council enforcement records and police data.*



TABLE H7a

Permanent residential pitch baseline and net additional pitch provision requirements 2006-2016

| Unitary/District Authority | Gypsies & Travellers | | Travelling Showpeople | |
|--|----------------------|--------------|-----------------------|-------------|
| | 2006 baseline | Requirement | 2006 baseline | Requirement |
| Total South East | 1,868 | 1,064 | 431 | 302 |
| Bracknell Forest | 15 | 15 | 17 | 2 |
| Reading | 0 | 7 | 11 | 2 |
| Slough | 40 | 7 | 0 | 1 |
| West Berkshire | 39 | 18 | 5 | 3 |
| Windsor and Maidenhead | 49 | 9 | 12 | 2 |
| Wokingham | 71 | 21 | 1 | 2 |
| Berkshire Unitaries | 214 | 77 | 46 | 12 |
| Aylesbury Vale | 41 | 39 | 4 | 6 |
| Chiltern | 12 | 9 | 1 | 16 |
| Milton Keynes | 18 | 36 | 0 | 3 |
| South Bucks | 87 | 15 | 0 | 1 |
| Wycombe | 36 | 15 | 10 | 2 |
| Buckinghamshire and Milton Keynes | 194 | 114 | 15 | 28 |
| Brighton and Hove | 0 | 13 | 0 | 2 |
| Eastbourne | 1 | 3 | 3 | 1 |
| Hastings | 1 | 2 | 0 | 1 |
| Lewes | 11 | 10 | 0 | 1 |
| Rother | 8 | 7 | 1 | 1 |
| Wealden | 22 | 20 | 1 | 3 |
| East Sussex/Brighton & Hove | 43 | 55 | 5 | 9 |
| Basingstoke & Deane | 0 | 11 | 2 | 17 |
| East Hampshire | 10 | 6 | 18 | 12 |
| Eastleigh | 2 | 4 | 3 | 6 |
| Fareham | 1 | 4 | 0 | 5 |
| Gosport | 2 | 2 | 0 | 3 |
| Hart | 40 | 13 | 9 | 8 |
| Havant | 2 | 4 | 0 | 5 |
| Isle of Wight | 0 | 27 | 0 | 0 |
| New Forest | 42 | 9 | 27 | 11 |
| Portsmouth | 0 | 10 | 0 | 7 |
| Rushmoor | 0 | 2 | 17 | 4 |
| Southampton | 14 | 12 | 8 | 9 |
| Test Valley | 13 | 18 | 14 | 18 |
| Winchester | 34 | 21 | 19 | 16 |
| Hampshire/Isle of Wight | 160 | 143 | 117 | 121 |

TABLE H7a – continued

Permanent residential pitch baseline and net additional pitch provision requirements 2006-2016

| Unitary/District Authority | Gypsies & Travellers | | Travelling Showpeople | |
|-------------------------------|----------------------|-------------|-----------------------|-------------|
| | 2006 baseline | Requirement | 2006 baseline | Requirement |
| Ashford | 106 | 30 | 4 | 3 |
| Canterbury | 50 | 30 | 10 | 4 |
| Dartford | 45 | 22 | 3 | 4 |
| Dover | 18 | 23 | 0 | 2 |
| Gravesham | 13 | 12 | 0 | 1 |
| Maidstone | 115 | 35 | 8 | 3 |
| Medway | 14 | 30 | 15 | 3 |
| Sevenoaks | 82 | 19 | 1 | 1 |
| Shepway | 1 | 12 | 0 | 1 |
| Swale | 48 | 28 | 3 | 2 |
| Thanet | 0 | 17 | 1 | 2 |
| Tonbridge and Malling | 37 | 18 | 3 | 1 |
| Tunbridge Wells | 17 | 14 | 0 | 1 |
| Kent | 546 | 290 | 48 | 28 |
| Cherwell | 48 | 15 | 14 | 11 |
| Oxford City | 0 | 9 | 1 | 3 |
| South Oxfordshire | 37 | 12 | 22 | 7 |
| Vale of White Horse | 37 | 12 | 3 | 4 |
| West Oxfordshire | 80 | 14 | 18 | 12 |
| Oxfordshire | 202 | 62 | 58 | 37 |
| Epsom and Ewell | 30 | 12 | 2 | 3 |
| Mole Valley | 20 | 6 | 4 | 1 |
| Reigate & Banstead | 12 | 27 | 12 | 12 |
| Tandridge | 33 | 7 | 1 | 1 |
| Elmbridge | 23 | 9 | 12 | 4 |
| Runnymede | 56 | 10 | 42 | 10 |
| Spelthorne | 22 | 8 | 0 | 6 |
| Woking | 24 | 16 | 0 | 8 |
| Guildford | 32 | 8 | 37 | 4 |
| Surrey Heath | 32 | 33 | 6 | 3 |
| Waverley | 52 | 10 | 0 | 1 |
| Surrey | 336 | 146 | 116 | 53 |
| Adur | 12 | 15 | 0 | 0 |
| Arun | 17 | 17 | 6 | 2 |
| Chichester | 64 | 54 | 18 | 3 |
| Crawley | 0 | 19 | 0 | 1 |
| Horsham | 44 | 50 | 1 | 5 |
| Mid Sussex | 36 | 20 | 0 | 2 |
| Worthing | 0 | 2 | 0 | 1 |
| West Sussex | 173 | 177 | 25 | 14 |



TABLE H7b

Indicators of need for transit provision by county group

| County group | Indicative transit advice/assessment | Unauthorised encampment caravans | | |
|-----------------------------------|--------------------------------------|----------------------------------|------------|------------|
| | | Winter | Summer | Change |
| Berkshire Unitaries | No advice | 23 | 16 | -7 |
| Buckinghamshire and Milton Keynes | No advice | 5 | 19 | 14 |
| East Sussex, Brighton & Hove | 2 sites | 24 | 84 | 60 |
| Hampshire, Isle of Wight | 4 sites | 40 | 113 | 74 |
| Kent and Medway | 7 sites/stopping places | 62 | 38 | -25 |
| Oxfordshire | No advice | 17 | 17 | 1 |
| Surrey | No advice | 2 | 15 | 13 |
| West Sussex | 25 transit pitches | 34 | 50 | 17 |
| South East | | 205 | 352 | 147 |

Number of caravans, averaged from CLG Caravan Count data 2004-07 inclusive. Figures do not sum due to rounding.

5. Background to the recommended approach

Introduction

5.1 This section explains the process by which we agreed the recommended level and distribution of residential pitches, and the recommended approach to transit pitch provision. Consultation played an important part and the headlines are noted. The feedback received and approaches used are summarised in detail in the Pre-submission Consultation Statement attached at Annex A.

5.2 The review sought to identify the level of accommodation needed, determine how it should be distributed between local

authorities and to consider how it will be provided. Local authorities were asked to form groups and submit advice to the Assembly on pitch requirements in their areas, taking into account their Gypsy and Traveller Accommodation Assessments (GTAAAs) and other factors they considered locally relevant. The ‘advice groups’ were asked to provide advice on two options for distributing the required number of pitches between them:

Option A: a distribution meeting needs by making provision within the same local authority where the need arises, essentially providing new pitches only where GTTS currently live

Option B: a distribution which seeks to protect and enhance the natural environment, including its biodiversity and landscape character while making best use of previously developed land and existing

or planned infrastructure provision; and facilitates access to employment opportunities and local services to support social inclusion.

Residential pitch requirements

5.3 The level of additional, permanent residential pitches required has been established by a bottom-up process. GTAAAs provided the base information underpinning local authority advice. GTAAAs were benchmarked for procedural robustness and internal consistency by independent academic consultants¹⁰. The results were fed back to local authorities to inform their submission of advice on pitch requirements.

5.4 Local authority advice was audited by the same consultants to establish whether it was reasonable in the light of the GTAA and benchmarking results, and any other local factors identified by the advice group as being relevant to the level of pitch provision proposed¹¹. As this was the first time GTAAAs have been carried out, councils were provided an opportunity to update their advice in the light of practice elsewhere in the region¹².

5.5 Additional government guidance,¹³ published part-way through the review, extended the process to Travelling Showpeople, including circus people. Supplementary Travelling Showpeople needs assessments were produced where

necessary and the results incorporated. For timing reasons these were not benchmarked, and Option B advice was not sought. Representatives of the Guild of Travelling Showmen identified 42 homeless families whose needs had not been accounted for and could not be allocated to any specific area using the approach in government needs assessment methodology¹⁴. This additional element of need was accepted and shared across the region.

5.6 GTAAAs assessed pitch needs for a five-year period. Part-way through the review it was decided that 10-year allocations would better address current and medium-term GTTS needs and add certainty in the planning process. Some advice groups provided pitch figures for a ten-year period. Elsewhere five-year requirements were extrapolated to 10 years by the Assembly using standard household growth assumptions¹⁵.

5.7 In some cases local authority advice groups recommended pitch numbers below the level of need identified in GTAAAs¹⁶, or advised that the extrapolation of onward need over-estimated future requirements¹⁷. The advice audit report¹⁸ identified this as an area of concern, while accepting the reasonableness of some of the adjustments made. In considering the relative merits of the top-down/expert audit view and the bottom-up view based on local knowledge the Assembly decided

FOOTNOTES

¹⁰ Pat Niner, University of Birmingham with colleagues from University of Salford/Sheffield Hallam University. Note the benchmarking process is a high-level check that assumes, but cannot confirm, the reliability of the underlying survey work. The consultants final report on GTAA benchmarking and the advice audit is available online: www.southeast-ra.gov.uk/southeastplan/consultation/gt_update.html.

¹¹ All advice submitted and the final report of the benchmarking and audit process is available online www.southeast-ra.gov.uk/southeastplan/consultation/gt_update.html.

¹² Updated advice was submitted by Kent and Surrey authorities, and was not re-audited.

¹³ Planning Circular 04/2007 Planning for Travelling Showpeople (CLG August 2007).

¹⁴ Primarily families evicted after losing appeals for unauthorised development sites.

¹⁵ 3% compound growth for Gypsies and Travellers, 1.5% for Travelling Showpeople.

¹⁶ Oxfordshire and Buckinghamshire (not including Milton Keynes) in original advice, and Surrey and Kent authorities in their updated advice after the audit process (although for Kent the change was modest and a by-product of improving consistency in assumptions used across their four GTAAAs). In addition figures for Chichester were reduced in accordance with advice audit recommendations to correct a double-counting error identified at benchmarking stage.

¹⁷ East Sussex.

¹⁸ www.southeast-ra.gov.uk/southeastplan/consultation/gt_update.html.



in favour of the latter, although we acknowledge that both viewpoints have their merits.

5.8 Issues and Options public consultation on the level of provision recommended by local authorities revealed mixed views. Not surprisingly most local authorities thought they were about right. Residents tended to view them as too high. Travelling Showpeople tended to view the numbers as low, although the Guild accepts that the Showpeople pitch numbers proposed for the majority of the region are a reasonable starting point¹⁹. Most Gypsies and Travellers and their community representatives consider the proposed number of pitches much too low in all areas, with a widespread view that the GTAA process has underestimated need. We have found no specific evidence that need has been underestimated but acknowledge the risk, not least as there is very little information available about GTTS populations on which to base GTAA forecasts of future accommodation need. Nonetheless, we conclude that the GTAA evidence base and local authority advice received is the best information available to us.

Residential pitch distribution

5.9 The recommended pitch provision distribution reflects a combination of local authority advice and the Assembly's strategic view of needs across the region. The latter is as much a political decision as a technical one.

5.10 When we compiled local authority advice we found that Options A and B produced similar spatial pitch distributions largely following existing GTTS settlement patterns. This meant that many parts of the region would continue to offer few or no GTTS pitches. To test whether this was an appropriate outcome the Assembly consulted on two additional, regionally redistributive options. It was agreed that they would be based on planning and sustainability considerations, not simply transferring pitches from high to low provision areas. That said the redistributive approach agreed generally tends to increase requirements in county areas where advised need arising is relatively low, and decrease them where they are comparatively high.

5.11 For Gypsies and Travellers the additional options build on the local redistribution within Option B, by pooling a proportion of each area's Option B allocation for regional redistribution²⁰ (the later inclusion of Travelling Showpeople in our process meant that no Option B distribution was

FOOTNOTES

¹⁹ The Guild disagree with vacancy rate assumptions used in assessments in the Thames Valley area.

²⁰ Further details are provided in the Further Options Technical Note available on the Assembly website. The same criteria were used to allocate provision for the 42 homeless Showpeople families noted previously. Note Hampshire did not submit an Option B distribution in their advice, so Option A was used instead.

produced, so Option A was used as a starting point²¹). Option C pooled 50%, and Option D pooled 25%. A proportion of the pooled total was then allocated back to each authority based on two equally weighted criteria, their share of the regional total of:

- Land area without restrictive environmental and landscape planning designations, representing relative constraints to development and environmental protection priorities
- Population at 2016, representing relative employment opportunities and access to public services (both tending to be more readily available in populous areas).

5.12 To recap, the four options consulted on at Issues and Options stage, all providing the same total number of pitches, were as follows:

Option A: to meet need where it arises

Option B: redistribution within local advice areas as locally determined, for Gypsies and Travellers only

Option C: Option B plus 50% regional redistribution

Option D: Option B plus 25% regional redistribution, a midpoint between options B and C.

5.13 Consultation revealed polarised views, with the most redistributive Option C approach attracting 41% support, followed by the least distributive approach, Option A (26%). Taken as a whole, a majority of respondents supported some redistribution (57% options C and D). Notably GTTS favoured greater redistribution (51% support option C and 15% support option D), although views from leading community representatives were mixed. Residents also tended to favour more even distribution. Councils

were almost the mirror opposite, with 63% opposing regional redistribution. A number of local authorities and town or parish councils identified significant constraints to local pitch delivery due to shortages of developable land, for example due to restrictive planning and environmental designations or tight urban boundaries.

5.14 Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) indicated that, at the regional scale, all the options produce a moderately positive overall effect on sustainability without significant adverse effects on habitat areas of European significance. The most important SA effects are the compelling positive socio-economic benefits to GTTS of making provision, and consequent reduction in the potentially adverse effects of recourse to unauthorised sites (which are common benefits to all four options). We consider there are no significant SA differences between the effects of the four options. That said, it is clear that GTTS welcome wider location choice in principle. On the other hand, while some are prepared to be mobile, if redistribution were too extreme there is a potential, but unquantifiable risk, that some pitches provided would not be occupied, reducing overall sustainability benefits.

5.15 Having considered consultation feedback received and the SA and HRA conclusions the Assembly recommends Option D as a deliverable compromise. While there is majority support for deeper redistribution, Option D will offer both widened choice and a less abrupt transition towards a pattern of provision that is more sustainable in the long-term. The combination of local and regional redistribution within this approach will assist pitch delivery by sharing responsibility for provision more widely

FOOTNOTES

²¹ Hampshire authorities agreed a total requirement for Travelling Showpeople but were unable to agree an Option A distribution. The Assembly generated an interim distribution for consultation using our redistribution methodology. By default this remains in place as Option A.



between councils. The Showmen's Guild and some representatives of the National Federation of Romany Gypsy and Irish Traveller Liaison Groups (Southern Network) also 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.

Transit provision

5.16 The Assembly recommends a delegated approach to transit provision. While there was a fairly low and mixed consultation response on the merits of this approach at Issues and Option consultation stage, and 79% support for provision where GTTS often stop while travelling, we conclude that the evidence currently available at regional level is insufficiently robust to make consistent transit pitch allocations across the region. Our draft policy recommends county-based joint working to establish the level and form of provision required. To assist local authorities in this task and to help address the current evidence gap we are commissioning a regional study into transit movement patterns and higher-level evidence of need. We aim to complete this work during 2009.

Pre-submission consultation statement



1. Introduction

- 1.1** This section describes the consultation process undertaken by the South East England Regional Assembly during the preparation of the review. It should be read in conjunction with the South East Plan *Submission Draft Policy H7: Provision for Gypsies, Travellers and Travelling Showpeople*.

2. Duties and background

- 2.1** Circular 01/2006 – Planning for Gypsy and Caravan Sites (ODPM February 2006) requires that a Regional Spatial Strategy (RSS) – in our case the South East Plan – identifies the number of caravan pitches required (but not their location) for each local planning authority in light of local authority Gypsy and Traveller Accommodation Assessments (GTAAAs) and a strategic view of needs across the region. This circular was published shortly before the draft South East Plan was submitted to Government, and before GTAAAs had been carried out in our region.
- 2.2** In light of the impending Circular 01/2006 and in response to an interim policy statement issued by the Government, the Assembly agreed at its Regional Planning Committee meeting on 7 December 2005 to an early partial review of the South East Plan to provide a full assessment of regional and district level pitch requirements for Gypsy and Traveller caravan accommodation. An interim statement was added to the Draft South East Plan submitted to the Government in March 2006²². Initial work on this partial review began shortly thereafter.

- 2.3** Circular 04/2007 – Planning for Travelling Showpeople (DCLG August 2007) extended the approach in Circular 01/2006 to include Travelling Showpeople; and the scope of this partial review was expanded accordingly.

- 2.4** The interim statement was updated to reflect progress on the partial review in July 2008, within the Government's Proposed Changes to the South East Plan.

Planning Policy Statement 11 (PPS11) requirements

- 2.5** PPS11 sets out the requirements for preparing a Regional Spatial Strategy revision along with the criteria for assessing whether it is sound. Criteria (vii) assesses “*whether community involvement and partnership working have been satisfactory, including whether the RPB has taken proper account of the views expressed*”. The legislative requirements for community consultation, along with recommended measures to facilitate community involvement are outlined in Annex D (paras 12 to 41) of PPS11.

- 2.6** In preparing this partial review, the Assembly has exceeded the consultation requirements as set out in PPS11, particularly in the context of a single policy issue for the South East Plan. A detailed report of the consultation process is set out in this report and a summary of the consultation opportunities is included in Table 1 overleaf.

FOOTNOTES

²² See Annex A of the Project Plan www.southeast-ra.gov.uk/southeastplan/consultation/gt_update_early_info.html.

BOX I

Submission Resources Website

Details of the documents referred to in this statement (including meeting minutes) that are not included as an annex can be found on the Assembly's submission resources website:

www.southeast-ra.gov.uk/sep_gtts.html

TABLE I

Overview of the Partial Review Consultation Opportunities

| Stage | Consultancy Opportunity |
|--|---|
| Project Plan and SA Scoping Report (See Section 4) | Six-week consultation period ending on 13 October 2008. |
| Advice to the Assembly from Local Authorities (See Section 5) | Authorities undertook their own consultation as part of the formulation and submission of advice to the Assembly. |
| Issues and Options Consultation (See Section 6) | Twelve-week consultation process held between 1 September and 21 November 2008. |
| Submission Consultation | Following submission a 12-week consultation period will be held by the Secretary of State (8 June 2009 – 28 August 2009). |

3. Partnership working

- 3.1** Three strands of partnership working, two formal and one informal, were agreed by Regional Planning Committee (RPC) on 20 May 2006 to guide the partial review process.

A Gypsy and Traveller RPC Steering Group

- 3.2** A member sub-group of RPC was set up to oversee and provide the necessary political steer at key stages in the review process. The Chair of the steering group provided direct feedback to RPC.

Engagement with GTTS representatives

- 3.3** The needs assessment stage of the Partial Review led by local authorities required direct and extensive local GTTS community engagement including surveys and interviews (see Section 5.5). Regional engagement sought to build on this by ongoing informal dialogue with GTTS community representatives. Assembly officers attended and gave updates to several planning committee meetings at the offices of the Showmen's Guild and at committee meetings of the National Federation of Romany Gypsy and Irish Traveller Liaison Groups (Southern Network) – and before that similar meetings held by Friends, Families and Travellers.

3.4 As the Partial Review progressed towards issues and options development and public consultation there was closer liaison with GTTS community representatives, including on the production of the consultation DVD and press coverage. Representatives also helped the Assembly to improve the consultation questionnaire and advised on approaches to engage their communities directly, including the survey (which they essentially delivered) and focus groups (co-ordinated by RAISE, see Section 6.6 below).

Gypsy and Traveller Officer Task Group

3.5 An officer task group was established to help co-ordinate the review process and take a strategic view of the needs of the region as a whole. The group has been responsible for: preparing the project plan; reviewing the emerging GTAAs to develop a strategic picture of demand and supply across the region and address any inconsistencies in the emerging evidence base; and reviewing the final policy advice submitted by the principal authorities. The group comprised:

- Representatives of all principal authorities and some local authorities
- GOSE
- Assembly officers
- A direct link to the Regional Housing Board through the representation of the Assembly's Housing Advisory Group.

4. Partial Review inception (Project Plan)

4.1 The Project Plan²³ was the first stage in producing a revision to the RSS and set out how the Assembly would approach the task, covering the period to submission to the Secretary of State.

4.2 To meet the requirements under the Planning and Compulsory Purchase Act the Project Plan included within it at Section 5 a Statement of Public Participation. This statement provided the process for which consultation would be undertaken as part of the Partial Review in relation to:

- Partnership working
- Stakeholder involvement
- Public consultation
- The list of stakeholder groups to be consulted.

4.3 All consultation undertaken as part of this partial review has been undertaken in accordance with the Statement of Public Participation.

4.4 Stakeholder consultation on the Project Plan

4.4.1 Consultation on the draft Project Plan was agreed by the RPC on 20 July 2006. Consultation commenced on 1 September 2006 and ended on 13 October 2006. Key stakeholders were consulted, as outlined in Table 5.1 of the Project Plan (See Annex B).

4.4.2 A total of 163 completed questionnaires and a further 34 letters were received by the 13 October deadline. Of the questionnaire responses received, 75% were from parish councils and a further 10% from local authorities. Only three responses were received from members of the Gypsy and Traveller communities, which may partly be a reflection of the procedural content of the consultation document.

FOOTNOTES

²³ For further information: www.southeast-ra.gov.uk/southeastplan/consultation/gt_update_early_info.html.

- 4.4.3** Headline messages from the consultation are as follows:
- 75% of respondents agreed with the proposed objectives for the review
 - A number of additional stakeholders were identified as essential for engaging with during the review process, including: social landlords; Travelling Showpeople; land managers; and a number of existing Gypsy and Traveller representative groups
 - The biggest concern expressed by consultees was in relation to the proposed timetable for the review, with only 60% considering it to be realistic.

Recommendations

- 4.4.4** The final Project Plan was agreed by the RPC on 21 November 2006. A small number of amendments were made to the final project plan, including an update to the consultation table (5.1) in the Statement of Public Participation; and adding reference to Travelling Showpeople in Objective 1 of the Partial Review.

4.5 Stakeholder consultation on the Sustainability Appraisal Scoping Report

- 4.5.1** The SA Scoping Report was consulted on at the same time as the Project Plan. In response to the consultation on the scoping report a significant number of consultees found the Sustainability Appraisal process complicated. However, technical responses from local authorities generally supported the

approach taken, although some questioned the relevance of a number of Integrated Regional Framework (IRF) objectives to this particular policy area.

Recommendations

- 4.5.2** No changes were made to the final SA Scoping report, however a recommendation to publish a non-technical summary on the Assembly's website was taken forward; along with a recommendation that the advice submitted by local authorities to the Assembly should include data on existing and proposed Gypsy and Traveller caravan sites.

5. Working with local authorities

- 5.1** In preparing options for consultation, the Assembly has worked with South East authorities who provided technical evidence in the form of accommodation assessments (GTAA's and TSAAs) and submission of formal advice. Consultation undertaken by authorities as part of the preparation of accommodation assessments and their advice is outlined below.

Advice sought from S4(4) authorities²⁴

- 5.2** The Assembly sought formal advice from local authorities on the appropriate level of provision and two ways of distributing that provision, drawing on their needs assessments. Advice was sought under Section 5(5)²⁵ of the Compulsory Purchase Act (2004) to engage the full partnership

FOOTNOTES

²⁴ For further information see the Brief for Submission of Advice by Local Authorities www.southeast-ra.gov.uk/southeastplan/consultation/gt_update_early_info.html.

²⁵ Section 5(5) of the Compulsory Purchase Act (2004) requires that the Regional Planning Body must first take account of Section 4(4) authorities where it decides to make different provision for different parts of the region. Section 4(4) of the same act requires RPBs to seek the advice of bodies with strategic planning expertise. In the South East of England these comprise the seven county and 12 unitary authorities.

groupings of local authorities, and not just principal (Section 4(4)) authorities. All South East councils fed into the process through 12 partnership groups.

5.3 Advice was submitted by:

- 31 January 2007 for confirmation of the partnership groupings of local authorities
- 30 April 2007 for the provision of site data
- 15 October 2007²⁶ for submission of district based figures, two spatial distribution options for permanent pitches and a qualitative assessment of transit provision needs
- Kent & Surrey authorities only, took advantage of a further opportunity to provide final advice in April 2008.

5.4 Consultation on the GTAAs/TSAs and advice submitted

5.4.1 Local authority groups, working in partnerships, were required to establish a steering group to oversee and formally agree the needs assessment studies and to interpret the study findings to submit agreed formal advice to the Assembly on pitch provision in their area. In preparing a GTAA/TSAA, it was necessary to undertake interviews with a sample of Gypsies and Travellers as part of the study methodologies – either as questionnaires, or direct interviews, in order to determine need.

5.4.2 In preparing advice, partnerships were expected to consult with appropriate delivery agencies, service providers and other stakeholders (eg town and parish councils, social landlords, Gypsies

and Travellers, social services, police etc).

A summary of the consultation undertaken by the partnerships can be found on the submission resources website (see Box 1; page 18).

6. Issues and Options public consultation

6.1 On 16 July 2008 the Assembly agreed a level of pitch provision and options for distribution, for the purposes of public consultation. This decision endorsed a supporting recommendation by RPC on 21 May 2008. A 12-week public consultation was held between 1 September and 21 November 2008 with respect to:

- The provision of an additional 1,064 residential pitches for Gypsies and Travellers between 2006 and 2016
- Provision of an additional 234-276 residential plots for Travelling Showpeople between 2006 and 2016
- Four distribution options (A-D):

Option A: New spaces should ALL be provided as close as possible to where GTTS currently live. This may mean some council areas have no spaces.

Option B: New spaces should ALL be in the same general areas where GTTS currently live. Neighbouring councils would share the duty for providing new spaces but some council areas would have none. The local redistribution takes account of local constraints and opportunities.

Option C: 50% of new spaces should be in the same general areas where GTTS currently live. The other 50% would be spread across the region to

FOOTNOTES

²⁶ The date for submission of this advice was extended from 1 June 2007 in the revised project plan.

make sure that all areas provide some spaces. The region-wide redistribution takes account of strategic constraints and opportunities.

Option D: 75% of new spaces should be in the same general areas where GTTS currently live. The remaining 25% would be spread across the region to make sure that all areas provide some spaces. The region-wide redistribution takes account of strategic constraints and opportunities.

- A delegated approach for transit provision whereby councils would identify the appropriate level and form of provision, taking into account GTAA information where available and a regional analysis of unauthorised encampment patterns.

6.2 Amendments were made to the consultation form, based on Gypsy and Traveller community advice.

6.3 Consultation events

6.3.1 The consultation programme included 23 local public drop-in exhibitions attended by up to 150 people, three local stakeholder/councillor meetings, four Gypsy and Traveller focus group sessions and a regional, facilitated stakeholder workshop. Assembly officers attended most of the staffed exhibitions; and presented to the local and regional stakeholder meetings. (See Annex A for the schedule of events.)

6.4 Local events

6.4.1 The 23 exhibitions were delivered by local authorities with financial, technical and staff support from the Assembly, including exhibition posters and display materials, a consultation DVD and copies of the consultation booklet and questionnaire. A media pack was also provided to help councils to

raise awareness of the consultation with their local and community networks such as Local Strategic Partnerships (LSPs), residents etc. This included draft editorial, logos and illustrations for use in organisations' newsletters and websites. Local authorities were encouraged to include a news article in their residents' magazines and funding was provided for paid media advertising.

6.5 General engagement

- The Assembly followed PPS1 I guidance to ensure relevant stakeholders were consulted (see Annex B). This involved sending out 4,100 consultation packs to relevant public, private and voluntary sector stakeholders
- Online consultation – the same material was made available on the Assembly website, including an online questionnaire
- Copies of all consultation materials were made available to local authorities and libraries for public inspection
- A consultation DVD (awarded the RTPI 2008 Equality and Diversity Award) was produced to raise awareness of the issues faced by the Gypsy and Traveller community as well as the consultation process. The DVD was available on the Assembly's website and 200 were distributed to key stakeholders. Where possible it was also shown at the consultation meetings (ie the local level exhibitions, the Kent Stakeholder meetings and the Stakeholder workshop)
- The Assembly also raised awareness of the consultation among public and stakeholders via:
 - E-alerts to our 1,200 website subscribers with links to the online consultation materials

- Editorial coverage in Assembly magazine Voice, distributed via 17,000 printed copies and also published on the Assembly website
- An edition of the South East Plan Update newsletter, circulated to around 2,000 stakeholders and published on the Assembly website.
- The Assembly employed Ipsos MORI to conduct research exploring public attitudes towards Gypsies and Travellers in the South East. This poll of 1,000 residents was conducted in October 2008
- **Stakeholder workshop**
The Assembly held a workshop on 4 November 2008, which brought together a diverse group of stakeholders to consider the GTTS consultation options and the underlying information and issues. This event was independently facilitated and aimed to promote better understanding of the concerns and points of views across the stakeholders. Attendees included councillors, members of the GTTS communities and representative groups, local authority officers from housing, planning, Travellers education, GTTS liaison services and Assembly officers. A summary of the outcomes is included in Annex C.

6.6 Targeted Gypsy, Traveller and Travelling Showpeople consultation

- Consultation packs were sent directly to all private or local authority sites that the Assembly had a record of. A total of 330 packs were sent out; 80 could not be delivered
- Gypsy and Traveller representatives²⁷ were commissioned to visit sites, both authorised and unauthorised (including roadside encampments) and housed Gypsies and Travellers, to explain the process, the consultation questions

and to help respondents complete the consultation questionnaire. Over 300 completed questionnaires were collected; spread evenly across the region

- 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
- Regional Action and Involvement South East (RAISE) was commissioned by the Assembly to undertake a research project on Gypsy and Traveller communities. Four focus groups were held, in Hart and New Forest District Councils in Hampshire, and in north and west Kent. These aimed to reach Gypsies and Travellers and gain further insight into the cultural needs of these communities and their views on the key elements affecting their quality of life. The report on the RAISE consultation is included on the submission resources website (see Box 1; page 18).

6.7 Media engagement

6.7.1 The Assembly communications team attracted wide media coverage to encourage responses to the public consultation. The Assembly worked proactively with national, regional, local and trade media to ensure the stakeholders and the public were kept informed of progress of the review. Work in this area has included media liaison, supplemented by paid print advertising.

6.7.2 A summary of the media coverage and paid advertising is provided in Annexes D and E.

FOOTNOTES

²⁷ The Thames Valley Gypsy Association supported by the National Federation of Romany Gypsy and Irish Traveller Liaison Groups (Southern Network), and Friends, Families and Travellers.

6.8 Consultation responses

6.8.1 There were 982 acceptable responses received to the Issues and Options consultation. Of these 7% were received from South East councils, 39% from GTTS communities, 19% from South East residents and the balance of 35% from other organisations and stakeholders (mostly town and parish councils). In addition, an Ipsos MORI poll contributed 1,001 responses from telephone interviews with adults across the region, approximately 125 from each of the eight South East county groups.

6.8.2 Statistical and commentary summaries of the responses to the Issues and Options consultation are included within Annex F and G respectively. The full Mori poll report is available on the submission resources website (see Box 1; page 18).

6.8.3 A further 145 responses were deemed to be discriminatory and were excluded from further consideration using guidance prepared by the Assembly's solicitors (which drew on Royal Town Planning Institute and Commission for Racial Equality guidance). These responses were returned to the respondent with a factsheet to help them understand why the response was discriminatory.

7. Sustainability Appraisal/Habitats Regulations Assessment

7.1 An independent Sustainability Appraisal (SA) and Habitats Regulations Assessment screening (HRA) was undertaken on the four options and proposals by Scott Wilson, and completed by the Assembly.

7.2 At the regional scale the SA showed that there are no significant differences between the impacts of the four options. Particularly given that the most important impacts are the positive socio-economic benefits to Gypsies, Travellers and Travelling Showpeople of making provision, and consequent reduction in the potentially adverse impacts of recourse to unauthorised sites (which are common benefits to all four options).

7.3 The draft SA included an allowance for the then unknown level of provision required for Showpeople and for transit use. This top-up estimate proved to be sufficient in assessing, as part of the updated SA, the total scale of all forms of provision outlined in the submission partial review. The particular issues around the concentration of additional Showpeople pitches required in Hampshire have also been assessed and do not change the assessment conclusions in the final SA. Consultation feedback pointed out that the draft SA in places overstated the potentially negative effects of options B to D, and it was corrected accordingly.

7.4 The HRA scoping (ie risk assessment) showed that it is unlikely that provision of new sites for Gypsies, Travellers and Travelling Showpeople would significantly affect areas of habitat value of European significance. Since no likely significant effects were identified a full 'Appropriate Assessment' was not necessary. Further consideration will be required at site allocation stage.

Annex A: Schedule of consultation events held

| EVENT LOCATION | EXHIBITION TYPE | DATE EVENT HELD |
|------------------------|------------------------|---|
| BERKSHIRE | | |
| No events held | | |
| BUCKINGHAMSHIRE | | |
| Aylesbury | Exhibition (staffed) | Thurs 16 Oct & Fri 17 Oct |
| Beaconsfield | Exhibition (staffed) | Thurs 9 Oct & Fri 10 Oct |
| | Exhibition (unstaffed) | Sat 11 Oct |
| HAMPSHIRE | | |
| Havant | Exhibition (unstaffed) | Mon 22 Sept (for 1 work week) |
| Fareham | Exhibition (staffed) | Tues 20 Sept & Weds 1 Oct |
| Test Valley | Exhibition (unstaffed) | Mon 6 Oct (for 2 work weeks) |
| Winchester | Exhibition | Tues 14 Oct (for 1 week) & Mon 3 Nov (for 1 work week) |
| | | |
| Eastleigh | Exhibition (unstaffed) | Mon 27 Oct (for 1 work week) |
| Fleet | Exhibition (staffed) | Mon 3 Nov & Tues 4 Nov |
| KENT | | |
| Gravesend | Stakeholder Meeting | Thurs 23 Oct |
| Maidstone | Stakeholder Meeting | Mon 27 Oct |
| Canterbury | Stakeholder Meeting | Tues 28 Oct |
| Chatham | Exhibition | Mon 29 Sept (for 1 work week) |
| Dover | Exhibition | Mon 6 Oct (for 2 work weeks) |
| Canterbury | Exhibition | Mon 13 Oct (for 2 work weeks) |
| Maidstone | Exhibition | Mon 20 Oct (for 1 work week) |
| Sittingbourne | Exhibition | Mon 3 Nov (for 1 work week) |
| Swanley | Exhibition | Mon 10 Nov (for 2 work weeks) |
| OXFORDSHIRE | | |
| Oxford | Exhibition (staffed) | Weds 15 Oct & Thurs 16 Oct |
| SURREY | | |
| Woking | Exhibition (staffed) | Weds 1 Oct |
| Guildford | Exhibition (staffed) | Mon 20 Oct |
| Redhill | Exhibition (staffed) | Tues 21 Oct |
| EAST SUSSEX | | |
| Bexhill | Exhibition (staffed) | Tues 14 Oct |
| Lewes | Exhibition (staffed) | Thurs 16 Oct |
| Hastings | Exhibition (staffed) | Mon 20 Oct |
| Uckfield | Exhibition (staffed) | Tues 21 Oct |
| Eastbourne | Exhibition (staffed) | Tues 28 Oct |
| WEST SUSSEX | | |
| No events held | | |

Annex B: Stakeholder consultation

- All Assembly members
- All county, unitary and district authorities in the South East
- All county, unitary and district authorities that border the South East
- All English Regional Development Agencies
- All English Regional Planning Bodies
- Countryside and landowner groups
- Fire and Police Authorities, NHS
- Government Agencies and Non Departmental Public Bodies (Environment Agency, Natural England, English Heritage Highways Agency, Housing Corporation)
- Local Strategic Partnerships in the South East
- Rural interest groups and organisations
- South East businesses and their representative bodies
- South East MP and MEPs
- South East regional organisations (eg GOSE, SEEDA, RAISE)
- Gypsy, Traveller and Travelling Showpeople organisations (FFT, National Federation) and the communities they represent
- Town and parish councils in and adjoining the South East
- Utilities providers (electricity, telecoms, water and sewerage).

Annex C: Summary of the key outcomes from the stakeholder event

Key Stakeholder Consultation Workshop
Tuesday 4 November 2008
Mandolay Hotel, Guildford

Key outcomes

Merits of provision

A wide range of benefits were identified for both 'settled' and GTTS communities, and the positives identified significantly outweigh the negatives.

Overall level of provision

Two main views emerged. Firstly, that the proposal levels of provisions are, to varying degrees, likely to be on the low side. Secondly (and in some cases as a follow-up to the first view), that the proposals are evidence-based and a reasonable starting point that can be improved upon by monitoring and future assessments and review. No-one suggested that the proposals are too high.

Pitch distribution options

The majority view was that there should be some degree of redistribution, but consensus did not extend to how much or on what basis. Of those who expressed a preference, more tended to favour the moderately redistributive Option D.

Transit provision

The consultation proposal that transit need be identified locally was not supported, for two main but divergent reasons. First, that there should be a specific transit provision requirement. Second, that effort should focus on permanent provision and that transit needs should be researched further.

Implementation

GTTS in particular stressed the need to get on with making provision. For some, prompt provision of what is currently proposed would be better than further delay around revising numbers upwards.

From differing perspectives there was a view that there should be a correlation between extent of provision made and the relative vigour of enforcement action on remaining unauthorised sites.

Annex D: Media coverage of the Gypsy, Traveller and Travelling Showpeople consultation – September to December 2008

| BROADCAST PRESS | | | | |
|--|----------|--|-----------|--------------------------------------|
| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
| BBC Radio Kent; BBC One South East Today (Kent) | 04/11/08 | An Assembly consultation says a third of the South East's new pitches could go to Kent. | Breakfast | Assembly release |
| BBC Radio Oxford; BBC Online | 04/11/08 | Oxford City Council has been criticised for saying it will not take any pitches outlined in the Assembly consultation. | Breakfast | Unknown |
| BBC Southern Counties Radio | 03/11/08 | Regional Planning Committee (RPC) Chairman, Cllr Moira Gibson is interviewed regarding consultation. | Breakfast | Assembly press release and interview |
| The Politics Show (BBC One South East) | 19/10/08 | The Assembly is running a consultation on Gypsy and Traveller pitch numbers. Interviews with Gypsies, members of the public and the Leader of Sevenoaks. | None | Assembly press release |
| South Today; South East Today; and Spotlight (all BBC One) | 14/10/08 | An Assembly consultation seeks views on Gypsy and Traveller pitch numbers. RPC Chairman, Cllr Moira Gibson interviewed. | None | Assembly press release and interview |
| Ocean FM | 30/09/08 | Plans for more Gypsy and Traveller pitches in the South East are being discussed by the Assembly. | None | Assembly press release |
| BBC Radio Three Counties | 25/09/08 | The Assembly has dropped from its consultation a question asking if Gypsies and Travellers should have the same rights as everyone else. | None | Assembly consultation documents |
| BBC South Today, BBC South East Today and BBC Radio Solent Breakfast | 04/09/08 | The Assembly wants views on Gypsy and Traveller pitches across the region. | None | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|-------------|----------|--|----------|---|
| 2Ten FM | 03/09/08 | Berkshire could see 78 new sites – the Assembly is seeking views. Cllr Moira Gibson interviewed. | None | Assembly press release and interview with Cllr Moira Gibson |

| ONLINE PRESS | | | | |
|---|--|---|---|---------------------------------------|
| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
| Oxford Times and Oxford Mail | 20/12/08 | A site in Oxford could be extended to house extra pitches outlined in the Assembly consultation. | Plan to extend travellers' site on to superdump | Unknown |
| Kent Messenger | 19/12/08 | There is anger that Kent County Council has suggested to Assembly consultation an option that will see the number of pitches in Swale double. | Travellers' pitches row | Unknown |
| Planning Resource and Planning Magazine | 12/12/08 | An Assembly produced Gypsy and Traveller DVD has been shortlisted for an RTPI national planning award. | RTPI Planning Awards 2008- Inspired choices | RTPI Awards |
| Guardian.co.uk | 19/11/08 | The Assembly is running a consultation to determine the number and spread of pitches. | Gypsies settle for unwanted sites | Assembly press release and interviews |
| Surrey Advertiser | 04/11/08 | Surrey CC has recommended to the Assembly that 118 new pitches should be created in the county. | Gypsy and traveller sites provision discussed | Assembly press release |
| Newbury Weekly News; Reading Evening Post; BBC Online; Bucks Free Press; Rye, Hastings and Battle Observer; Eastbourne Herald and Bexhill Today | 04/11/08 02/11/08 01/11/08 22/10/08 21/10/08 | The Assembly is consulting on pitch numbers. | Views on travellers sites sought | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|---|--|---|---|------------------------|
| Bexhill and Mid Sussex Today; Rye and Battle Observer; and Eastbourne Herald | 22/10/08 | Rye councillors are considering a response to the Assembly's consultation. | Rye is being called on to identify new sites for Gypsies and Travellers | Assembly consultation |
| Bexhill, West Sussex, Worthing, Mid Sussex and Shoreham Today; Battle and Hastings and Rye Observer; Eastbourne Herald; Littlehampton Gazette; Sussex Express; and Bracknell and Wokingham Standard | 04/10/08 30/09/08 29/09/08 27/09/08 26/09/08 19/09/08 | The Assembly is running a Gypsy and Traveller accommodation consultation with events across the region. | Council's views on accommodating gypsies and travellers are sought | Assembly press release |
| BBC online | 03/09/08 | Assembly launches Gypsies, Travellers and Travelling Showpeople consultation. | Views sought on traveller sites | Assembly press release |
| PA News Wire | 02/09/08 | Assembly launches Gypsies, Travellers and Travelling Showpeople consultation. | Gipsy site talks to begin | Assembly press release |

TRADE PRESS

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|---------------|----------|--|---|------------------------|
| World's Fair | 19/12/08 | The Society of Independent Roundabout Proprietors discusses the Assembly consultation. | Lively debate at SIRPs AGM | SIRPS meeting |
| Business News | 01/10/08 | The Assembly is running a consultation on Gypsy and Traveller pitch numbers. | Assembly wants views on Gypsy and Traveller needs | Assembly press release |
| Planning | 05/09/08 | Assembly consultation on pitch options for Gypsies, Travellers and Travelling Showpeople begins. | In brief | Assembly press release |

| REGIONAL PRESS | | | | |
|--|--------------------------------------|---|--|-------------------------|
| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
| Portsmouth News (and web); Southern Daily Echo (and web); and Andover Advertiser (web) | 16/12/08 | East Hampshire has told the Assembly that they do not need any pitches. | 'Gypsies don't want to live here' says council | Unknown |
| Windsor, Ascot & Eton Express; and Maidenhead Advertiser (and web) | 12/12/08 11/12/08 | Assembly consultation says more pitches are needed. | More traveller pitches | Assembly press release |
| Witney Gazette; Oxford Mail and Oxford Times | 03/12/08 28/11/08 27/11/08 | Oxfordshire County Council has responded to Assembly consultation saying its pitches should be shared equally among its five districts. | New gypsy pitches to be shared equally | Unknown |
| Aldershot, Yateley Camberley, Ash & Farnham, Sandhurst & Crowthorne, Farnborough and Fleet Mail; and Surrey Hants Star Courier | 02/12/08 | Assembly consultation closes (NB: Although this is a correction to a previous story, one of the figures is wrong – Ed.). | Consultation closes on proposed sites for travellers | Assembly correspondence |
| Kent Messenger | 28/11/08 | A local councillor attends a consultation event. | Borden | Unknown |
| Eastbourne Herald; Rye and Battle and Hastings Observer (web); Eastbourne Herald (web); Bexhill Today (web) | 28/11/08 (02/12/08) (01/12/08) | A Gypsy says that Gypsies and Travellers need to be accepted into the community and need permanent pitches. The Assembly closed its consultation on Friday. | Gypsy speaks out on group's rights | Assembly press release |
| Petersfield Post and Petersfield Today | 26/11/08 (02/12/08) | East Hampshire has told the Assembly that they do not need any pitches. | Councillors rule not to set up gypsy sites | Unknown |
| Cobham, Walton & Hersham, Esher and Weybridge News & Mail; Surrey Advertiser (web); Surrey Times; Staines and Ashford and Staines and Egham News | 26/11/08 22/11/08 19/11/08 | Assembly consultation says more pitches are needed. | Number of gypsy pitches is set to rise by a third | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|--|----------------------------------|--|---|------------------------|
| Surrey Times | 22/11/08 | Surrey County Council is submitting a response to the Assembly's consultation. | Choosing sites for gipsies and travellers in Surrey | Unknown |
| The Portsmouth News | 13/11/08 | Portsmouth Council is submitting a blank form in response to the Assembly consultation as the city does not believe it has any room for pitches. | Blank draw for travellers | Unknown |
| Bracknell and Ascot News; Andover, Alresford and Romsey Advertiser (web); Winchester News Extra & Advertiser; Ascot Wokingham, Bracknell, and Crowthorne & Sandhurst Times; Adscene; Medway Standard; Alton Post Gazette; Haslemere Herald; Hastings & St Leonards, Slough & Langley and South Bucks Observer; KM Extra; Brighton Argus; South Bucks Star; Basingstoke Observer; Reading and Hampshire Chronicle; Reading Evening Post and Portsmouth News | 13/11/08 07/11/08 06/11/08 | Time is running out to respond to the Assembly consultation. | Days left to comment on traveller's site plan | Assembly press release |
| Argus (Brighton) | 03/11/08 | The Assembly wants views on pitch numbers. (Incorrect numbers appear in the article. A correction has been published – Ed.) | Campsites for travellers | Assembly press release |
| Southern Daily Echo; Dorking and Leatherhead Advertiser; Kent & Sussex Courier; Kent Messenger; Isle of Wight County Press; and Rye Observer | 03/11/08 31/10/08 22/10/08 | The Assembly wants views on pitch numbers. | Shape the future of gypsy housing | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|--|--|--|---|------------------------|
| Liphook Herald | 31/10/08 | Liphook parish council has discussed the Assembly's consultation. | Gypsy sites under the spotlight at meeting | Assembly consultation |
| Oxford Mail | 24/10/08 | Oxford City Council says the city cannot cope with any pitches outlined by the Assembly. | City council objects to distribution plan | Unknown |
| Sandhurst & Crowthorne, Camberley, Fleet, Yateley, Aldershot, and Farnborough News; Basingstoke Gazette; Surrey Hants Star Courier; and Petersfield Post | 24/10/08 23/10/08 | An exhibition is being held in Fleet, Hampshire to inform people about the Assembly's consultation. | Traveller site exhibition | Assembly release |
| Crawley Observer | 15/10/08 | Crawley Council says although it recognises the need for the permanent sites outlined by the Assembly, there needs to be more power to deal with unauthorised sites. | Council 'not keen' on permanent traveller sites | Unknown |
| Oxford Mail; Bexhill on Sea Observer; East Grinstead Courier and Observer; Seaford Gazette; and Hayling Islander | 14/10/08 10/10/08 09/10/08 01/10/08 | The Assembly is seeking views on how South East Gypsy and Traveller pitches should be distributed. | Meeting for gipsy pitch | Assembly press release |
| Reading and Woodley Chronicle | 09/10/08 | Article documents the plight of a Traveller family. The Assembly is running a consultation on pitch numbers. | 'They can evict us... we will keep coming back' | Unknown |
| Kent Messenger | 03/10/08 | Swale Council has not identified any transit sites for four years. An assessment for the Assembly shows that an extra 80 pitches are needed up to 2016. | Urgent action demanded on huge gipsy site | Unknown |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|--|--|--|--|------------------------|
| Eastbourne Herald; Hastings and St Leonard's Observer; Hampshire Chronicle; Haslemere and District Messenger; Southern Daily Echo (and web); West Sussex County Times; Kent and Sussex Courier; Bognor Regis, Midhurst and Petworth and Chichester Observer (and web eds); Farmers Guardian (and web); Liphook Herald; Newbury Advertiser; and Banbury Guardian | 03/10/08 02/10/08 01/10/08 30/09/08 26/09/08 25/09/08 23/09/08 19/09/08 11/09/08 04/09/08 | The Assembly is running a consultation on Gypsy and Traveller accommodation with events across the region. | None | Assembly press release |
| Downs Mail | 01/10/08 | There is concern that a decision to allow a site in Maidstone will give an open passport to Gypsies. The Council is unable to act, because the Assembly does not have guidelines. | Are the floodgates now open for more gypsy settlements | Unknown |
| Surrey Advertiser | 26/09/08 | Assembly planning chairman Cllr Moira Gibson corrects an article that said Assembly consultation was seeking views on 2,340 Gypsy and Traveller pitches across the region. This should be 1,064. | Assembly seeking pitch opinions | Assembly letter |
| Crowthorne and Sandhurst Times, Newbury Advertiser | 17/09/08 | Berkshire should have 78 Gypsy and Traveller pitches, says Assembly consultation. | Call for more traveller spaces | Assembly press release |
| Reading Evening Post (and web) | 15/09/08 | Berkshire should accommodate 78 Gypsy and Traveller pitches, says Assembly consultation. | Call for county to offer 78 traveller and gipsy spaces | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|---|--|--|--|------------------------|
| Farnham Herald | 12/09/08 | Waverley could get more Gypsy and Traveller pitches than elsewhere in Surrey under an option in the Assembly consultation. | Consultation sought on traveller sites | Assembly press release |
| Romsey Advertiser; Kent and Sussex Courier; Medway Messenger; Surrey and Hants Star; Your Canterbury, Maidstone, Thanet, Medway, Shepway, Dover and Swale; and The Argus (Brighton) | 12/09/08 10/09/08 05/09/08 04/09/08 02/09/08 | Assembly consultation begins on options for Gypsy, Traveller and Travelling Showpeople sites. | Plan bids to provide more travellers' sites | Assembly press release |
| Dorking Advertiser | 11/09/08 | Mole Valley could get up to 17 more Gypsy and Traveller pitches, according to options in the Assembly's consultation. | District 'needs more pitches for travellers' | Assembly press release |
| News Shopper (and web); Gravesend Reporter; Dartford and Swanley Times; and KM Extra (web) | 11/09/08 02/09/08 | Assembly consultation on Gypsy, Traveller and Travelling Showpeople pitches begins. Kent could get 320 new Gypsy and Traveller pitches. | Give views on gipsy camp sites | Assembly press release |
| Dover Express | 11/09/08 | Assembly consultation on Gypsy, Traveller and Travelling Showpeople pitches begins. Dover could see pitch numbers more than double from 24 to 54. | Views on extra travellers' sites | Assembly press release |
| Hastings Adnews; Hastings and St Leonards Observer; Mid Sussex, Worthing and Bexhill Today; Sussex Express; and Rye and Battle Observer | 10/09/08 05/09/08 | The Assembly wants to hear views on targets for Gypsy and Traveller sites. West Hill and Bexhill residents recently complained about nearby travellers for creating rubbish and flouting parking laws. | Have your say on the best sites for gypsies | Assembly press release |
| Bucks Herald | 10/09/08 | More than 700 Gypsies and Travellers could be moved to Buckinghamshire in proposals outlined by the Assembly. | Bucks to be home to 700 gypsies | Assembly press release |

| MEDIA TITLE | DATE | SUMMARY | HEADLINE | SOURCE |
|---|----------------------|--|---|------------------------|
| Bucks Free Press | 09/09/08 | Travellers left rubbish on a Bucks AONB after vacating the site. The Assembly is consulting on pitch options. | 'I'm angry – it's just a mess' | Unknown |
| Bucks Free Press | 09/09/08 | Local people are asked if councils should be responsible for finding homes for travellers. | Are councils responsible for travellers' homes? | Vox pop |
| Surrey Advertiser | 05/09/08 | Assembly consultation starts on options for Gypsy, Traveller and Travelling Showpeople pitches. (Article incorrectly says opinions are being sought on allocating 2,340 pitches, this should be 1,064 – Ed.) | Sites earmarked for travellers | Unknown |
| Bucks Free Press and Marlow Free Press | 05/09/08 | South Bucks could get up to 60% more Gypsy and Traveller pitches, according to Assembly consultation. | 'Find more places for gypsies' says authority | Assembly press release |
| The News (Portsmouth) | 05/09/08 | Portsmouth may be forced to find up to 10 pitches for Gypsies and Travellers, according to Assembly consultation. Portsmouth Council leader, Cllr Gerald Vernon-Jackson says he will fight the proposals. | New traveller sites could be imposed | Assembly press release |
| Slough and Langley Observer and Maidenhead Advertiser | 05/09/08 04/09/08 | Assembly consultation on Gypsy and Traveller pitches in Windsor and Maidenhead and Slough begins. | Public asked about more gipsy sites | Assembly press release |
| Newbury Weekly News | 04/09/08 | Town councils should get more legal advice on how to deal unauthorised sites, says a parish clerk. The Assembly begins its consultation on pitch options. | Call for legal help to confront travellers | Unknown |

Annex E: Paid advertisements

| MEDIA | EDITION (DAY, DATE) | |
|--|---------------------|-------------|
| Aldershot News | Friday | 7 November |
| Banbury Guardian | Thursday | 6 November |
| Basingstoke Weekend Gazette | Thursday | 13 November |
| Bucks Free Press | Friday | 14 November |
| Bucks Herald | Wednesday | 12 November |
| Chichester Observer | Thursday | 13 November |
| Crawley Observer | Thursday | 13 November |
| East Grinstead Courier & Observer | Wednesday | 12 November |
| East Kent Mercury | Thursday | 13 November |
| Eastbourne Gazette | Wednesday | 12 November |
| Farnham Herald Series (Six papers covers NE Hants) plus Surrey & Hants News | Friday | 14 November |
| Hampshire Chronicle | Thursday | 13 November |
| Hants Advertiser & Times Series | Saturday | 15 November |
| Hastings & St Leonards Observer | Friday | 14 November |
| Henley Standard | Friday | 14 November |
| Herald Series | Wednesday | 12 November |
| Isle of Wight County Press | Friday | 7 November |
| Kent & Sussex Courier | Friday | 14 November |
| Kent Messenger (Maidstone) | Friday | 14 November |
| Kentish Express | Thursday | 13 November |
| Kentish Gazette | Thursday | 13 November |
| Maidenhead Advertiser | Thursday | 6 November |
| Mid Sussex Times | Friday | 14 November |
| Milton Keynes Citizen | Thursday | 6 November |
| Newbury Weekly News | Thursday | 13 November |
| Oxford Mail | Tuesday | 11 November |
| Oxford Times | Thursday | 13 November |
| Portsmouth News | Friday | 7 November |
| Reading Chronicle | Thursday | 13 November |
| Reading Evening Post | Wednesday | 5 November |
| Sevenoaks Chronicle | Thursday | 13 November |
| Southern Daily Echo | Monday | 10 November |
| Surrey Advertiser | Friday | 7 November |
| Surrey Mirror | Thursday | 13 November |
| Surrey & Hants News (part of Farnham Herald) | Monday | 10 November |
| Sussex Express & County Herald | Saturday | 8 November |
| Thanet Adscene | Thursday | 13 November |
| The Argus (brand: int, lite, online) – Brighton | Thursday | 6 November |
| West Sussex County Times | Friday | 7 November |
| Worthing Herald | Thursday | 13 November |

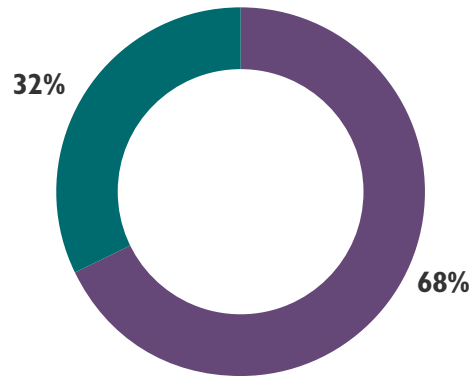
Annex F: Statistical analysis of GTTS consultation responses

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

Key

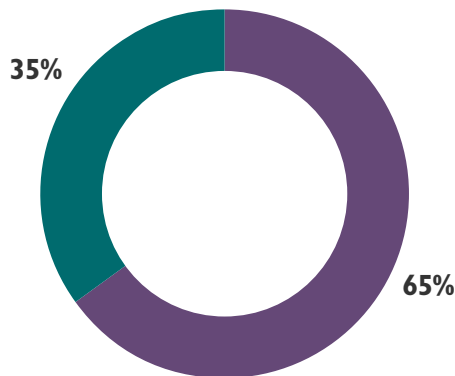
- Yes
- No

All respondents



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

GTTS only



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

SE Councils only



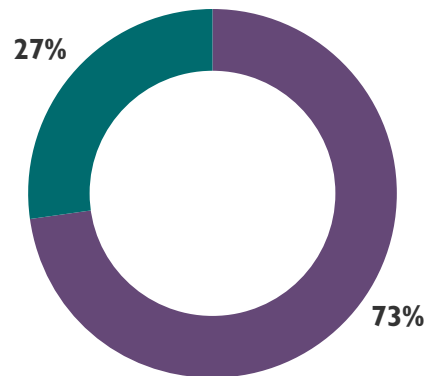
51% no response/no opinion/don't know

Residents only



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

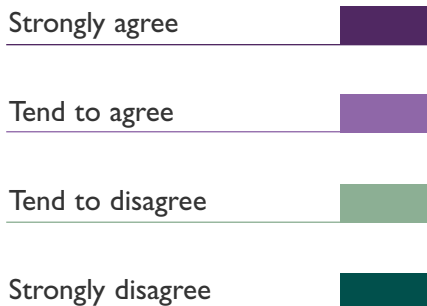
Other stakeholders



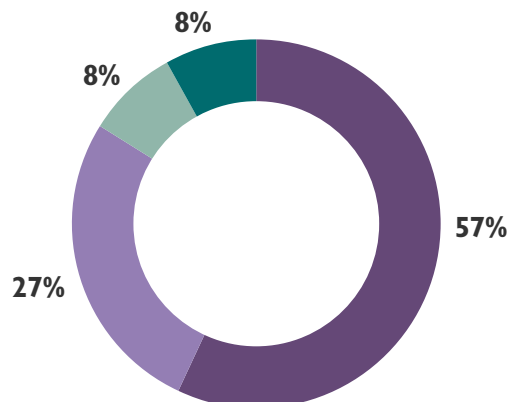
36% no response/no opinion/don't know

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

Key

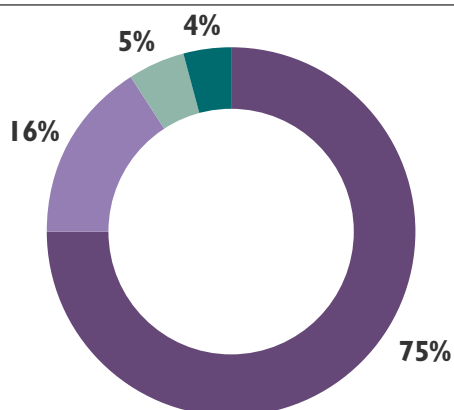


All respondents



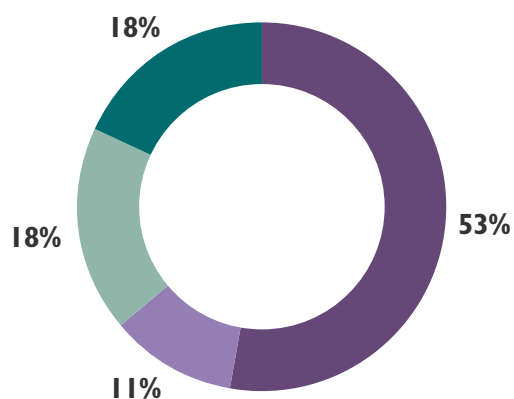
13% no response/no opinion/don't know

GTTS only



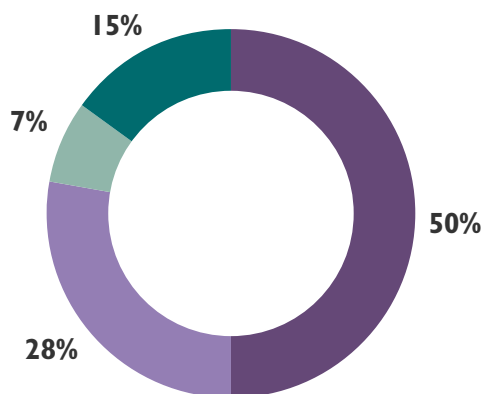
3% no response/no opinion/don't know

SE Councils only



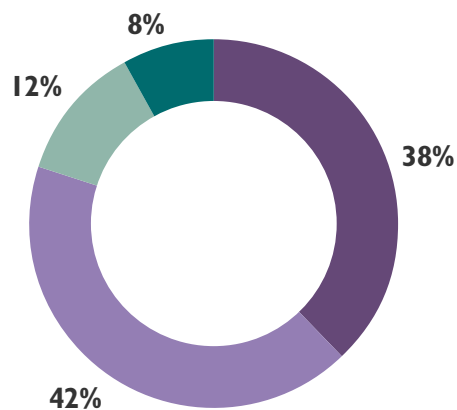
46% no response/no opinion/don't know

Residents only



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

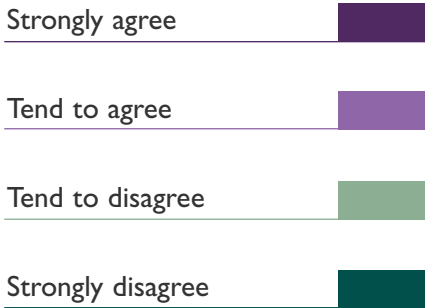
Other stakeholders



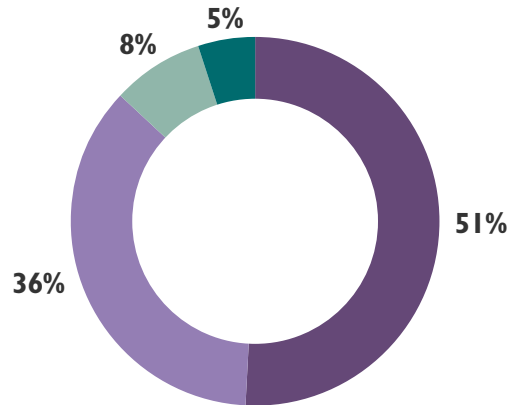
17% no response/no opinion/don't know

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

Key

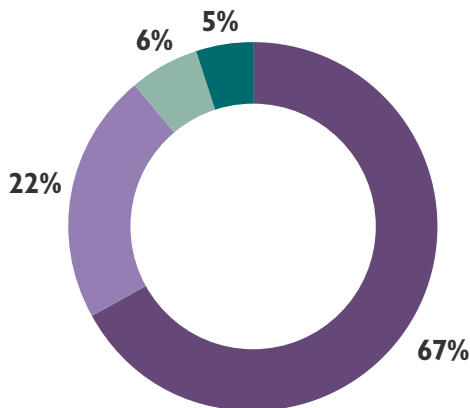


All respondents



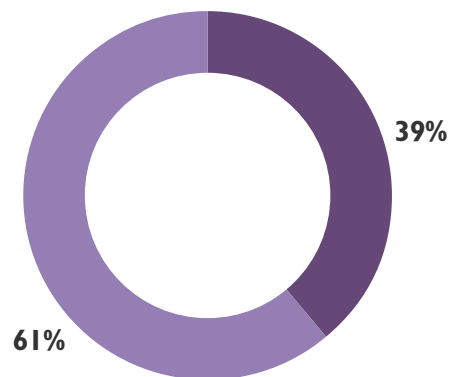
13% no response/no opinion/don't know

GTTS only



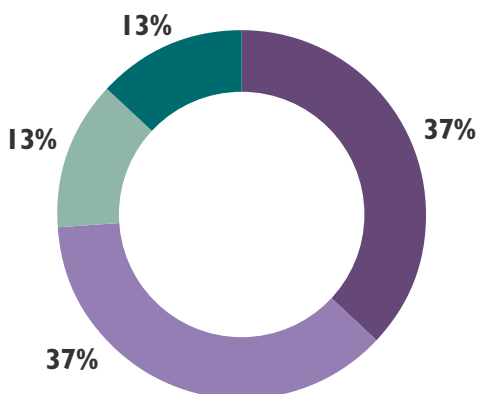
3% no response/no opinion/don't know

SE Councils only



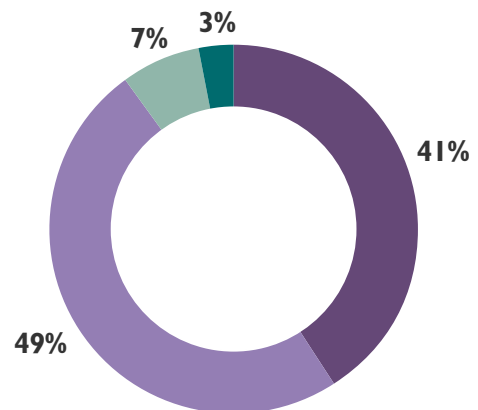
46% no response/no opinion/don't know

Residents only



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

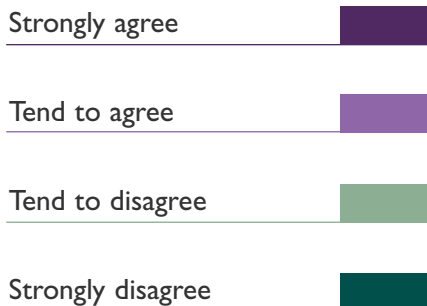
Other stakeholders



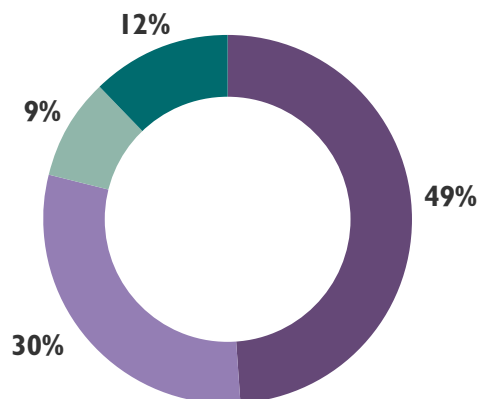
17% no response/no opinion/don't know

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

Key

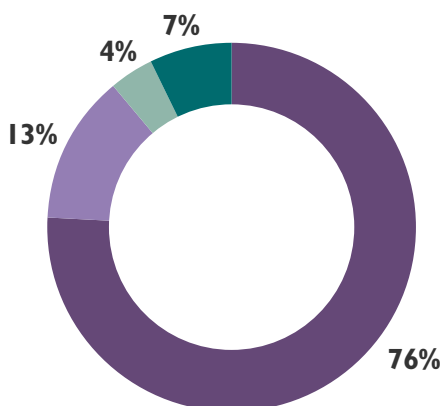


All respondents



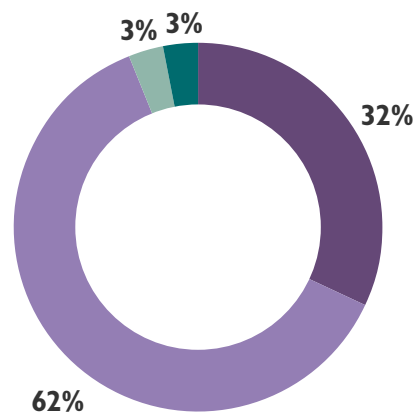
15% no response/no opinion/don't know

GTTS only



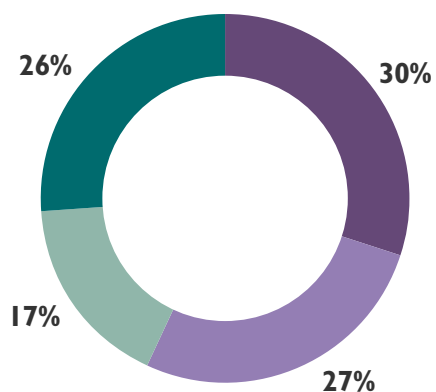
5% no response/no opinion/don't know

SE Councils only



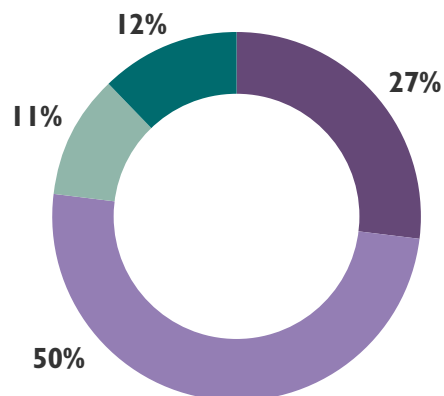
51% no response/no opinion/don't know

Residents only



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

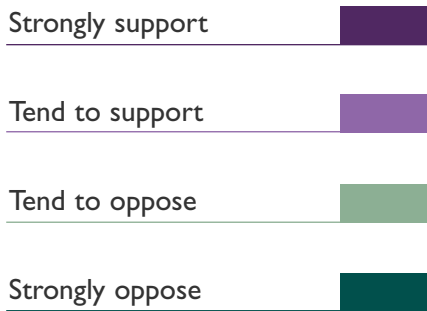
Other stakeholders



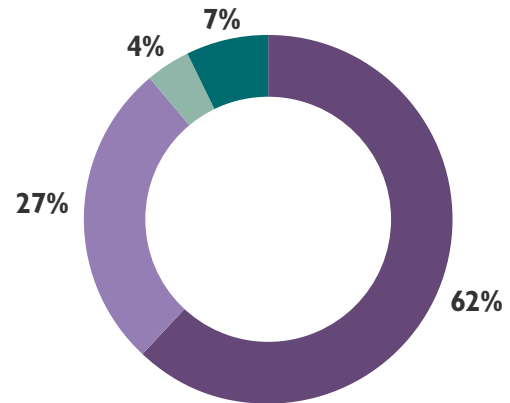
19% no response/no opinion/don't know

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

Key

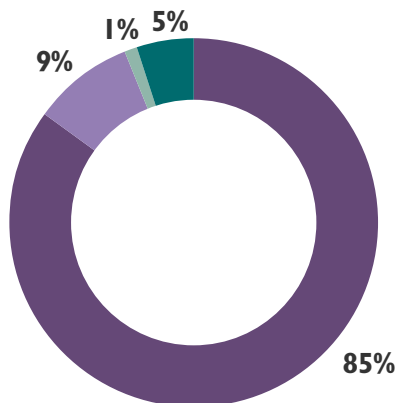


All respondents



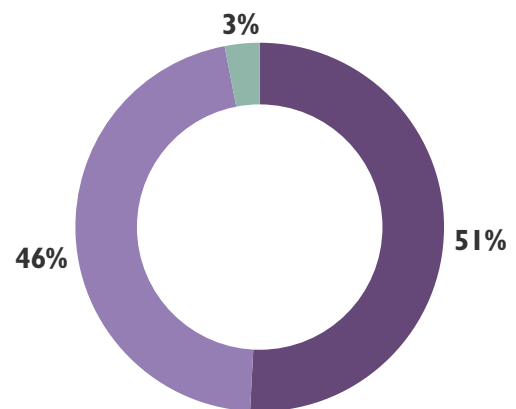
14% no response/no opinion/don't know

GTTS only



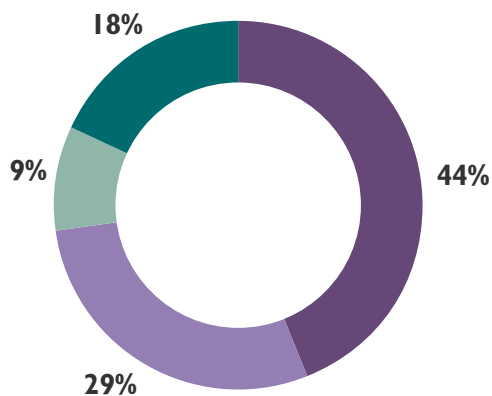
5% no response/no opinion/don't know

SE Councils only



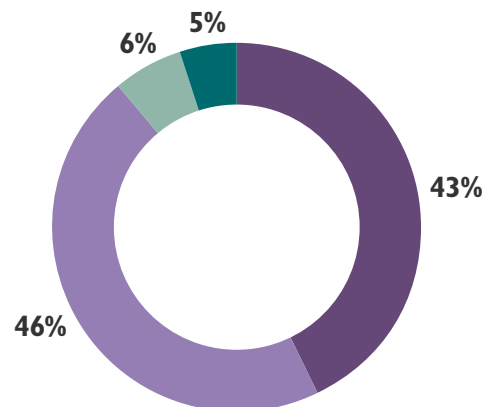
47% no response/no opinion/don't know

Residents only



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

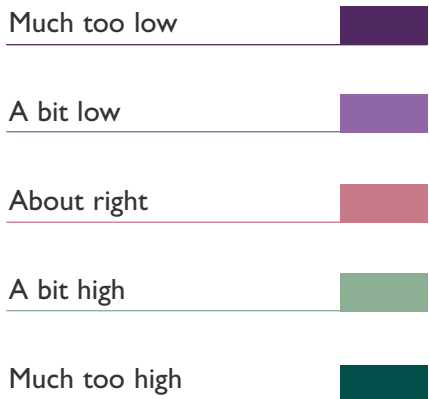
Other stakeholders



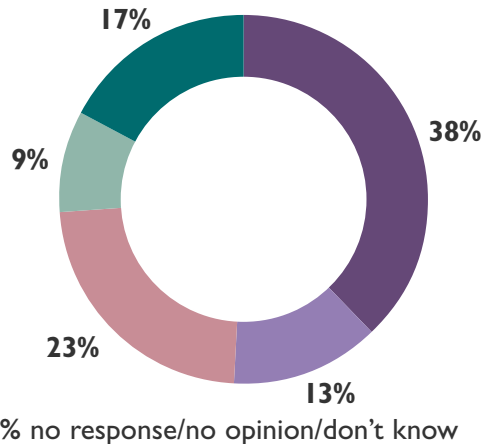
17% no response/no opinion/don't know

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

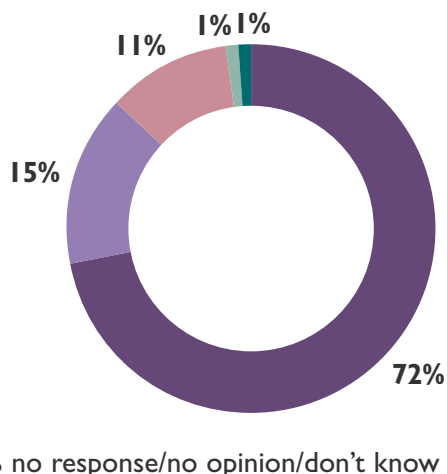
Key



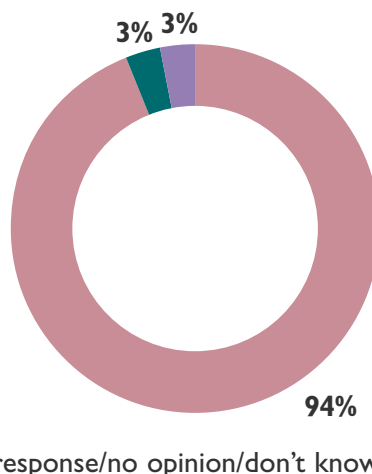
All respondents



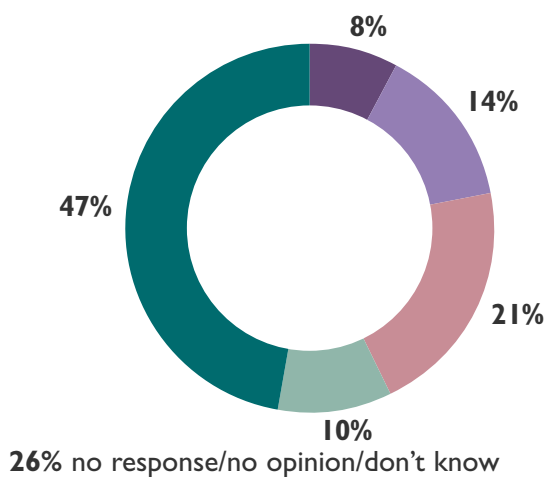
GTTS only



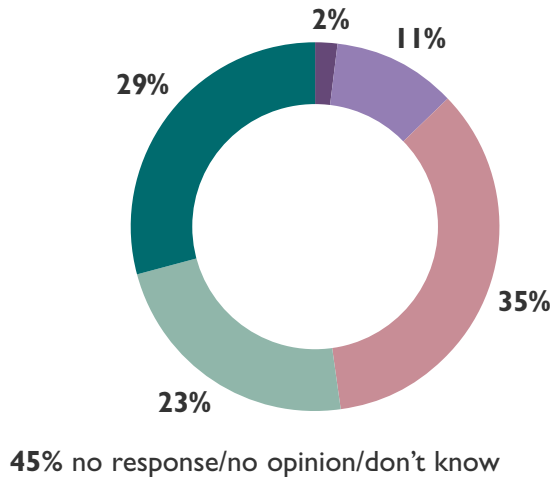
SE Councils only



Residents only

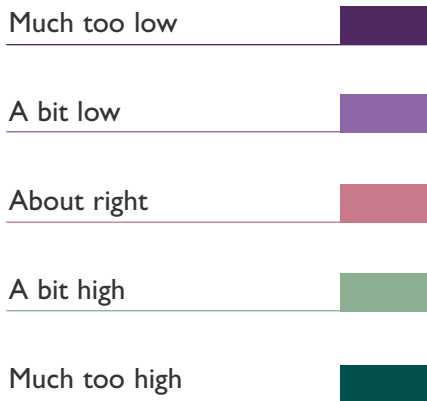


Other stakeholders

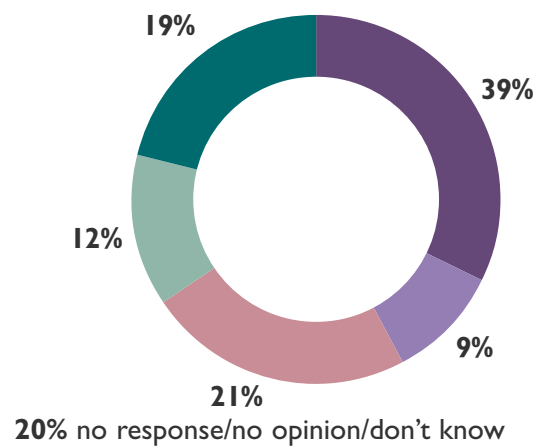


4 Views on proposed county level provision for Gypsies and Travellers (Option A figure)

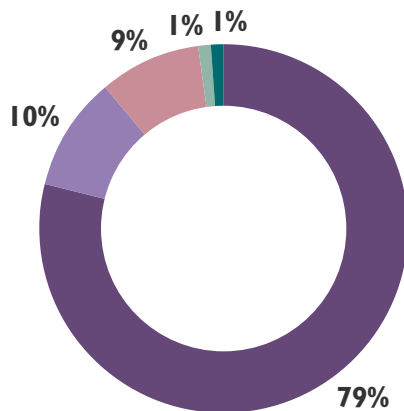
Key



All respondents

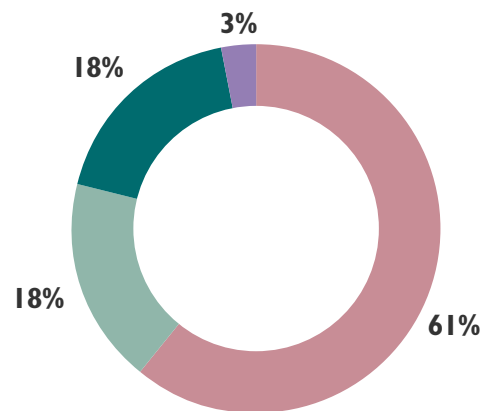


GTTS only



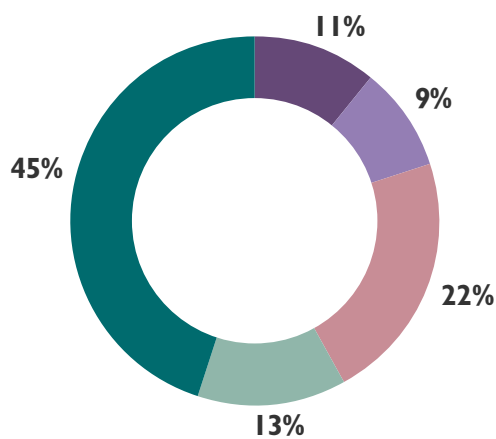
7% no response/no opinion/don't know

SE Councils only



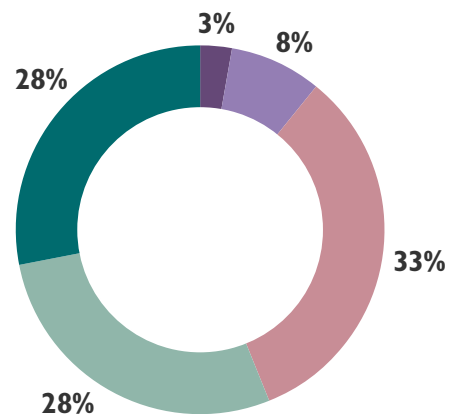
46% no response/no opinion/don't know

Residents only



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

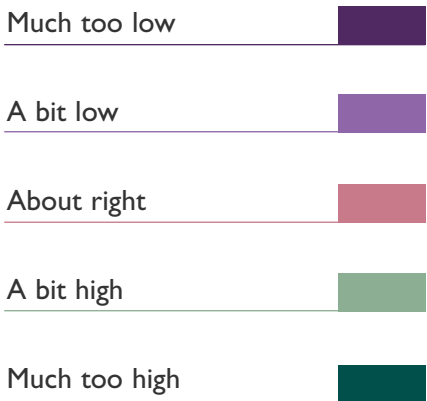
Other stakeholders



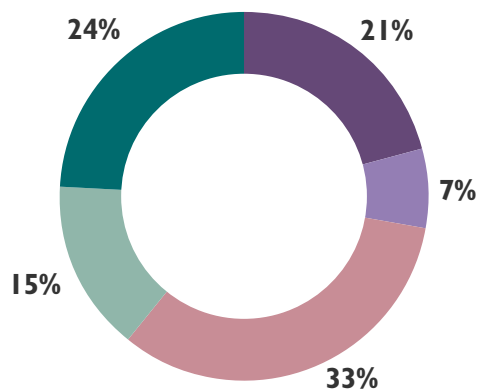
30% no response/no opinion/don't know

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

Key

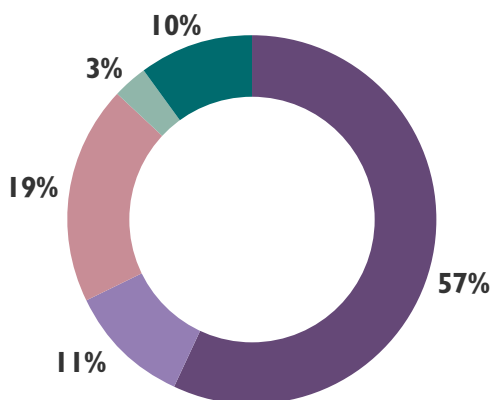


All respondents



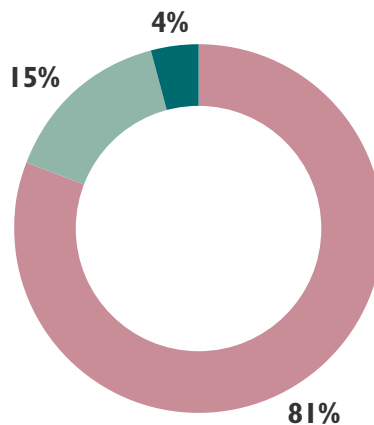
50% no response/no opinion/don't know

GTTS only



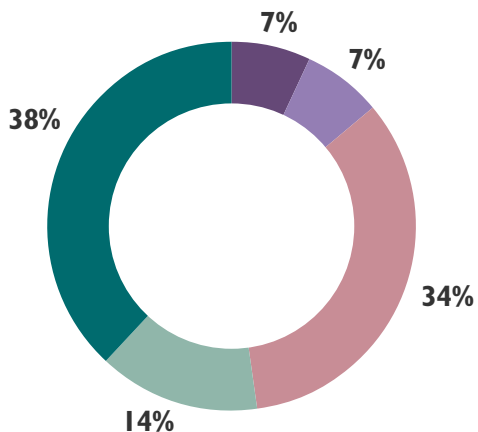
60% no response/no opinion/don't know

SE Councils only



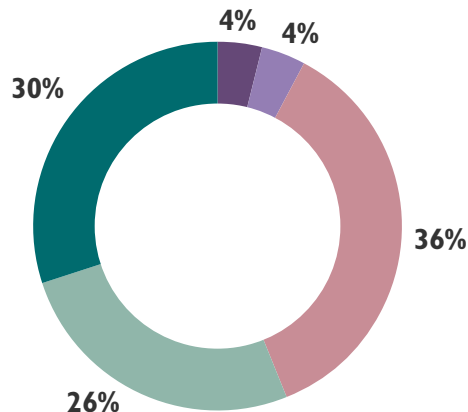
63% no response/no opinion/don't know

Residents only



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

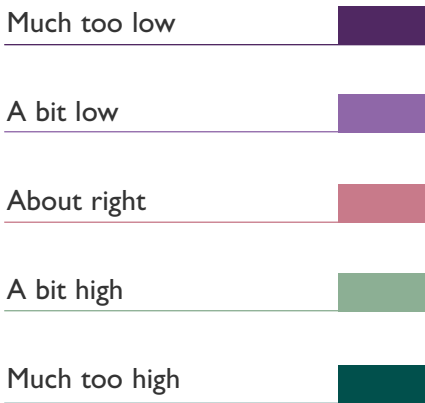
Other stakeholders



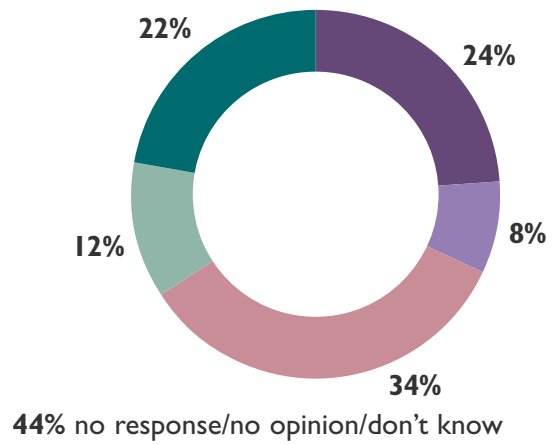
46% no response/no opinion/don't know

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

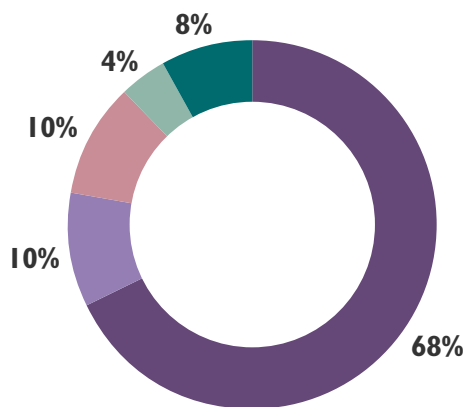
Key



All respondents

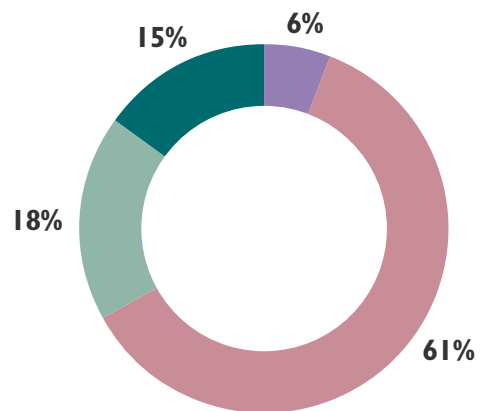


GTTS only



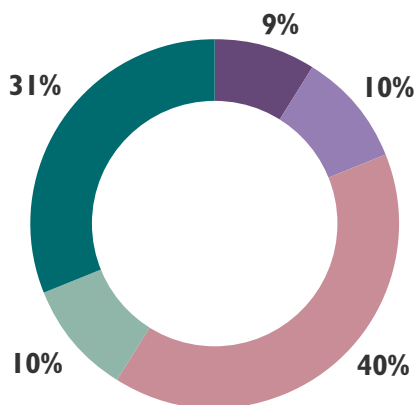
57% no response/no opinion/don't know

SE Councils only



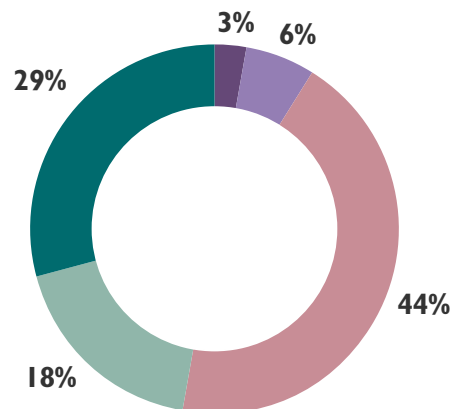
53% no response/no opinion/don't know

Residents only



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

Other stakeholders



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

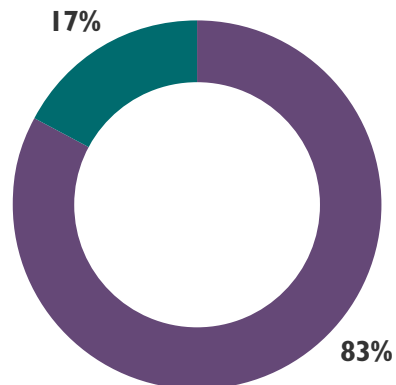
7 Respondent aware of a Gypsy & Traveller site in their area

Key

Yes 

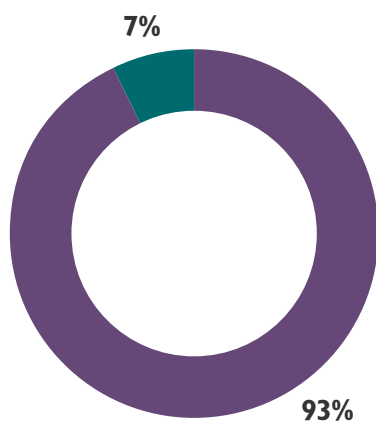
No 

All respondents



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

GTTS only



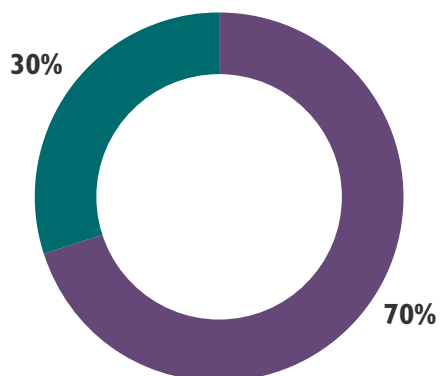
7% no response/no opinion/don't know

SE Councils only



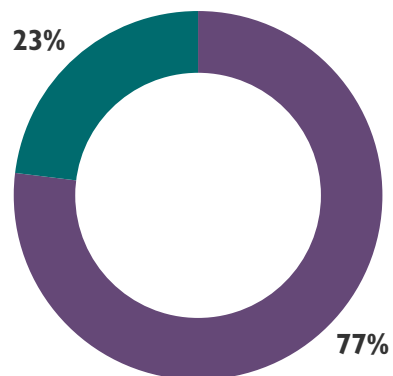
44% no response/no opinion/don't know

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



Option B
local/county redistribution



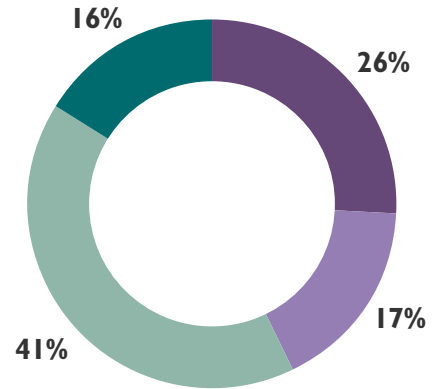
Option C
greater regional redistribution



Option D
lesser regional redistribution

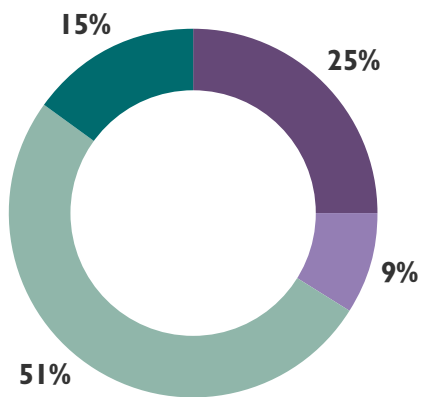


All respondents



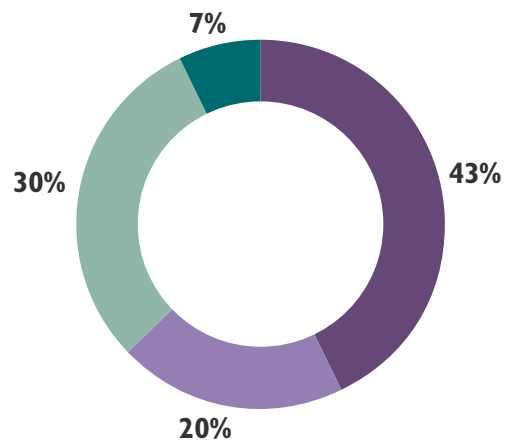
12% no response/no opinion/don't know

GTTS only



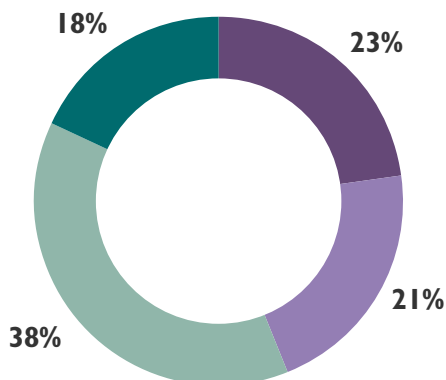
5% no response/no opinion/don't know

SE Councils only



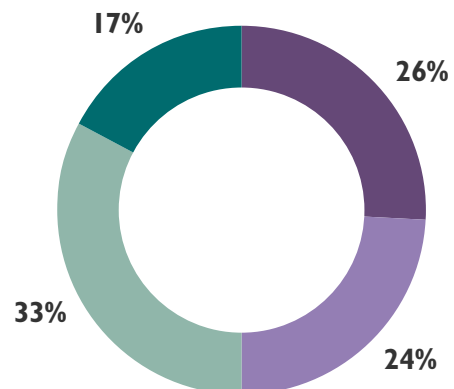
13% no response/no opinion/don't know

Residents only



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

Other stakeholders



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

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

Key

Yes



No

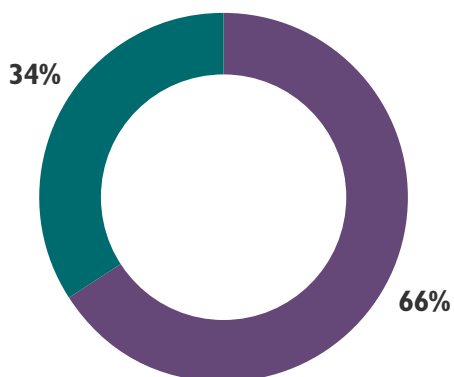


All respondents



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 G:

Summary of consultation responses – received by questionnaire, online, letter and email

These responses were agreed by the Assembly on 4 March 2009. We have amended the formatting slightly to more clearly attribute comments by category of respondent, included in brackets with the following key:

GTTS: Gypsies, Travellers and Travelling Showpeople
SEC: South East Councils
RES: Residents
Others: All other stakeholders, including Town and Parish Councils.

Q3&4 Views on the proposed level of provision for Gypsies and Travellers (regional and county figures)

Summary of Responses

- The proposals are about right as they reflect GTAA evidence, the best information currently available and compiled with G&T input. (*SEC*)
- The assessments are too high. (*Others/Res/SEC*)
- Assessments identify aspirations not actual need. (*SEC*)
- 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. (*Others/Res*)
- Provision should be much higher or unlimited, and any surplus could be used by non G&Ts. (*GTTS*)
- GTAA's underestimate need as acknowledgement in full would not be politically expedient. (*GTTS*)
- The proposed level of provision is a conservative minimum estimate and a number of *GTTS* noted that they had not been counted in the GTAA's. (*GTTS*)
- 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. (*Others/Res/GTTS*)

Agreed Assembly Response

Noted.

This is a methodology issue for councils at GTAA stage and was not identified as a problem in benchmarking.

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.

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.

The process and methodology is new, and while unlikely to be perfect the GTAA's have sought to involve *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 impossible to quantify – over time, as the process delivers, those in hidden need

Summary of Responses

- Assessments may have overlooked or missed 'hidden' G&Ts in need. (*Others/GTTS/SEC*)
- Similar general comments were made about all areas at county level.
- The East 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. (*GTTS/Others*)
- West Sussex figure does not account for growth and fluctuation in New Traveller population. (*GTTS*)

Agreed Assembly Response

may gain the confidence to make their needs known.

Noted, but it is unclear the extent to which this represents additional need or need already assessed in the GTAA.

Q5&6 Views on the proposed level of provision for Showpeople (regional and county figures)

Summary of Responses

- The figures reflect the available evidence, including the needs assessments. (*SEC*)
- Showpeople figures supported, except in Thames Valley, but as a minimum and starting level of provision. (*GTTS*)
- 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 (ie double counting). (*Others/Res/SEC*)
- The demand for such a high number of sites was questioned in the context of declining and less frequent shows. (*Others/Res*)
- The need element for 42 homeless families is questioned. (*SEC*)
- 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. (*Others/Res/SEC*)

Agreed Assembly Response

Noted, although benchmarking has clear limitations.

Noted.

The data is the best currently available.

The Showmen's Guild suggest this is offset by increasing business in other ride/show operations, eg corporate/commercial events.

The Guild has confirmed that they can provide details of the individual families at issue.

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.

Summary of Responses

- The level of unauthorised sites in Hampshire is much higher than recorded in the GTAA. (GTTS)
- Due to local shortages, and existing overcrowding, the figures were considered low in a number of areas eg East Sussex (*Others/Res*), Bracknell, Southampton and Mole Valley (GTTS).
- 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. (GTTS)
- A recently completed needs assessment indicates a higher level of provision may be appropriate for Oxfordshire. (SEC)

Agreed Assembly Response

Noted, but in principle these issues should be taken into account in assessments. The Guild accepts the relevant estimates as a minimum starting point.

Noted. The figures are based on local needs assessments and reflect council advice, as the Assembly's agreed basis for provision. In the absence of revised advice this is a technical matter for resolution at Examination in Public.

Noted. Advice based on the TSAA results should be submitted. [*Assembly note: updated results now incorporated.*]

Q8 Comments on preferred distribution option

Summary of Responses

- A number of respondents saw Option A or B being similar and thus supported either, with many of the reasons given being the same. Likewise many supporting Option C would also support Option D.
- Option A would allow GTTS to be close to friends and families, where there are existing facilities to meet their needs (*Others/Res/SEC*), as well as a degree of community integration (GTTS).
- GTAA evidence is that most GTTS want to remain locally (SEC). Consequently, Options C and D may not address GTTS wishes and pitches might not be taken up. (SEC/*Others/Res*).
- Support a fairer, redistributive approach as new provision for G&Ts will be disproportionately concentrated in areas that have made provision in the past, and this will improve equality and spatial choice for G&Ts – particularly in respect to Kent and Surrey. (All)

Agreed Assembly Response

Noted.

Need evidence is but one of several material planning considerations. All options meet the same level of need. GTAA's struggle methodologically to address need from outside their 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.

Noted. Consultants results and East of England experience lends support in principle for a degree of redistribution.

Summary of Responses

- Option A is preferable for TS sites as they tend to travel in large groups and need large sites, making redistribution infeasible. (SEC)
- Option 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. (SEC)
- Option B is based on local sustainability considerations and is the most sustainable. (SEC)
- Option B reflects evidence of need but also provides some choice of location to G&Ts and shares responsibility for provision (GTTS/SEC), including better sharing of the resources/ services needed (Others).
- Option C supported as it provides greater choice for GTTS, thus improving access to employment opportunities and other community facilities. (All)
- Option C is more equitable to local authorities (and their residents) that have previously met their obligations to provide for GTTS, helping address past inconsistencies. (Others/Res/SEC)
- Option D is the most balanced or fair option, allowing security in the existing area (including families able to stay together) (All), but also some opportunity or freedom of choice to move to other areas (GTTS).
- Options C and D could help avoid ghettos or overcrowding in certain districts, thus reducing problems with the settled community. (GTTS)
- Options C and 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. (SEC)

Agreed Assembly Response

The reasoning appears to reflect a very localised experience which is not considered representative. Showpeople tend to seek settled home sites from which to travel to pre-arranged shows.

Noted

Noted. SA indicates little difference between the options' effects.

Noted

Noted, the majority of GTTS respondents concur.

Noted. Government seeks that responsibility for provision is shared more widely, but this is one of several material planning considerations.

Noted

Noted

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.

Summary of Responses

- For Travelling Showpeople, 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. (SEC)
- A less arbitrary approach is needed to identify where the needs of the 42 homeless Showpeople families should be met. (SEC)
- Guild suggestion is that the needs should be met where they own the land they were evicted from, not distributed across the region. (GTTS)
- Kent CC proposes an alternative to their own Option B advice. Further work in progress to resolve and issues with the allocation of Showpeople plots in North and West Kent post 2011 (whole requirement allocated to Dartford). (SEC)
- No option supported due to extremity of local constraints justifying no provision/much reduced provision/greater redistribution/local determination. (SEC)

Agreed Assembly Response

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.

Showman's Guild support widening provision in principle; and Showpeople tend to live in private yards in small/immediate family groups.

Noted. Eviction follows loss of appeals against refusal of planning permission for unauthorised developments. To do so would essentially reward purchase of inappropriate land.

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.

The process requires specific allocations. Requirements are very small relative to those for housing and no authority is so constrained that any provision is impossible (a position also reached by the Panel for the East of England GTTS review).

Q9 Alternative distribution approaches

Summary of Responses

- Need to recognise land availability constraints to provision in dense urban areas, including protective designations on abutting land. (*Other/SEC*)
- In principle Options C and D should be based on Option A rather than Option B. (*SEC*)
- Option E: Approach similar to Option C but starting from Option A, and adding criteria for brownfield land opportunities, wider role of authorities in housing supply, comparative accessibility to key services, and adjusting for the greater sensitivity to the nature of environmental constraints at, and around, key settlements where pitch provision may be expected. (*SEC*)
- Additional or amended criterion for Option C and D which considers the relative extent of the unconstrained urban boundary. (*SEC*)
- Option A or B in the first instance plus a modest extra figure for each LA currently with low or no provision, to address both equity/choice, unrecorded need, and likely under-estimation of total need. (*GTTS/Others*)
- There should be an option that redistributes more than 50%. (*SEC*)

Agreed Assembly Response

It is not accepted that any authority is unable to find any land for GTTS use, nor was this accepted in the East of England inspectors' report. By this reasoning the South East should accommodate a proportion of London's arising need. In principle any housing land can be employed, and some protected land eg Green Belt can be considered on an 'exceptions site' basis.

In principle Option B should be more sustainable from the perspective of the area concerned, and it also adds a degree of local redistribution that will in principle enhance deliverability. Some areas have forged a consensus or majority support around Option B that should not be discarded lightly.

The Assembly has opted for a simple approach using readily available data, drawn from the wide range of techniques used locally within the region. There are many plausible alternative criteria but a more technical and complex approach is better suited to site selection than the modest redistribution of a fairly small number of pitches across a very large region with considerable variations in character. The policy wording will enable councils working together to pool and locally redistribute their allocations if they so wish.

The agreed Assembly approach is that redistribution should be guided by criteria relevant to planning and sustainability.

Extreme redistribution is likely to reduce social sustainability, a balance needs to be struck between ability to provide, extent of locally arising need and the flexibility of some but not all GTTS appear prepared to accept or to welcome.

Summary of Responses

- By taking account of all land that is not protected by environmental constraints. In respect to Options C and D, more weighting should be given to the environmental constraints. (*Others/SEC*)
- Taking account of available infrastructure, community facilities, and employment as well as the level of deprivation in an area. (*Others/Res/SEC*)
- A wider and more equitable redistribution from high provision areas, based as a starting point on latent demand evidenced by unauthorised encampment levels. (*SEC*)
- All areas should have the same provision, or one site be provided for every district. (*Other/Res/GTTS*)
- Where GTTS own land and cannot get planning permission, or allow GTTS site expansion for families. (*GTTS*)
- A number of comments were made that suggested improving the evidence, such as TES information, waiting lists, police records and asking the GTTS and their representatives where they wish to live. (*Other/Res/GTTS*)

Agreed Assembly Response

Weighting for opportunities as well as constraints is considered more balanced as it also addresses people's needs. Given the small numbers of pitches required (compared to housing) the significance of environmental constraints should not be overstated.

More relevant to local implementation. Deprivation varies within as well as between districts. GTTS provision in the most deprived localities within districts can and should be avoided.

Unauthorised encampment levels also include those passing through, not just those in need of a pitch locally.

Some correlation to the scale of local need seems more appropriate.

Unauthorised developments, family growth and overcrowding are factored into needs assessments.

GTAAAs tend to consider all or most of these sources of information, all of which have some issues of reliability or suitability for needs estimation, eg TES records do not contain sufficient detail to draw conclusions on level, location or type of need, as this is not their purpose.

Q10 Alternative transit provision approaches

Summary of Responses

- Include transit or visitor provision on new residential sites. (*SEC*)
- Each area should have a transit site, especially big towns; or be evenly distributed over the South East. (*Other/Res/GTTS*)

Agreed Assembly Response

Noted, LDF matter. An option for visitor accommodation, but potentially disruptive for residents to accommodate passing G&T strangers.

Noted, but some correlation with the extent and location of need would be preferable.

Summary of Responses

- Use GTAA information (SEC). 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. (All)
- Count data is unreliable and volatile and should be rounded out with additional data sources, such as unauthorised encampment records from the police and LAs, waiting list records, TES records, court records or demand from existing transit sites. (All)
- Take into account regional transit/migration patterns (SEC) or locations where GTTS go to find work (GTTS).
- There was support for a regional strategic provision of transit pitches (GTTS/SEC); however others felt that this should be delegated to the county or sub-regional level. (SEC)
- The emphasis should be on permanent residential provision to reduce transit site need, rather than the provision of transit sites. (SEC)

Agreed Assembly Response

The use of GTAA information accords with the proposed consultation approach, count data is to fill gaps. However, there will not be time to undertake additional assessments to inform advice to government [*Assembly note: follow-up research to be completed during 2009*].

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.

Nonetheless the Assembly sought police and LA enforcement records. 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. A pragmatic way forward is needed, and Caravan Count is at least consistently collected and available. Use of averaged eight counts/ four years data should even out volatility.

Most areas lack transit sites altogether so cannot monitor demand in use.

Such information would be useful but does not yet exist. Regional research will be considered. [*Assembly note: follow-up research to be completed during 2009*].

Noted. A way forward is proposed that combines elements of both.

To meet the requirements of Circular 1/2006, transit provision also needs to be addressed – there is need for both.

Q11 Other needs not accounted for

Summary of Responses

- Housed G&Ts are difficult to identify and thus their needs may not be fully reflected. (*GTTS*)
- Hidden travellers. (*GTTS*)
- European Gypsies. (*GTTS/Res/Other*)
- G&Ts with horses and wagons, with specific needs for horses. (*GTTS/Res/Other*)
- New age travellers need a network of temporary stopping places suitable to alternative lifestyles (ie not concrete sites). (*GTTS/Res/Other*)

Agreed Assembly Response

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.

Unquantifiable.

If permanently resident in the UK this should in theory be picked up in GTAAs.

Should be accounted for numerically in GTAAs. The specific nature and location of local provision is an LDF matter.

In theory should be accounted for in GTAAs, but it is difficult 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.

Q12 Comments on SEA / AA

Summary of Responses

- Each option has not been assessed on its own merits, casting doubts that the SA meets the statutory requirements. (*SEC*)
- 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. (*SEC*)
- 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. (*SEC*)

Agreed Assembly Response

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 the options has been changed to provide more clarity. The assessments of Options B to D are presented on their own merits.

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

Summary of Responses

- A re-consideration and further investigations concerning the impact on the fear of crime is necessary. (*SEC, GTTS*)
- The SA and HRA should have considered the in-combination effects of the South East Plan (housing numbers) and the four options for GTTS to highlight potential discrepancies between the options. (*Others*)
- It is questionable that in areas with European sites (eg the Thames Basin Heath SPA), harm to such sites and its biodiversity can be ruled out. (*Others/SEC*)
- 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. (*SEC*)
- There are other environmental considerations that need to be taken into consideration, such as the provision of foul drainage infrastructure. (*Others*)
- The SA should include an explicit assumption against sites in Flood Zones 2 and 3. (*Others*)
- It has to be recognised that different ethnic groups will not want to live on the same sites. (*Others*)

Agreed Assembly Response

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.

The contradictions related to the impacts on fear of crime and the inaccurate recommendations have been addressed.

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.

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 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.

This is a matter for the identification of GTTS sites at local level.

The recommendation concerning the SA Objective on flooding has been amended accordingly.

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).

Summary of Responses

- The SA omits assessing the impact of the Showpeople proposals. (*Others*)
- The SA includes errors concerning figures from the CLG Caravan Count 2006 and the water supply situation within some districts. (*SEC*)
- Various individual locations/areas are unsuitable for GTTS sites or require further investigation. (*Others/Res*)

Agreed Assembly Response

In the light of a lack of data an appropriate allowance was made for Showpeople requirements. As further data is now available the SA has been amended accordingly.

The errors have been corrected.

This is a matter for the identification of GTTS sites at local level.

Q13 Other comments

Summary of Responses

- Recognition of the Gypsy way of life and identifying sites will improve community cohesion (*Others/Res*), however it is important that decision-makers are resolved to deal with any opposition (*GTTS*).
- Gypsies should be encouraged to integrate into wider society, adopting a settled lifestyle. Possibly being put into social housing. (*Res*)
- Building more sites could also free up Council houses occupied by GTTS who would prefer a site. (*GTTS*)
- 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. (*GTTS*)
- There should be greater flexibility for genuine applications, including allowing unobtrusive sites with landowners consent or the cessation of enforcement action until 60% of new pitches are provided. (*GTTS*)
- Any outcome should reduce illegal parking and ensure swift action if illegal camps are set up, ending the contradiction of planning laws. (*Others/Res*)

Agreed Assembly Response

Noted.

Those that wish to travel have a legally recognised human right to do so and to live in caravans/trailers.

Noted.

Noted.

Noted. A local authority implementation matter.

Not a regional matter.

Summary of Responses

- Underused sites should first be identified and considered before new sites are developed. (SEC)
- Alternatively, some felt that sites should not be too large, which would help integration/ community relations. (Others/Res/GTTS)
- Different GTTS and families have different needs and often don't get on. (Others/Res/GTTS)
- It was commented that sites should not be in the Green Belt and/or sparsely populated, small rural communities. (Others/Res)
- There were also a number of comments made that were site specific, or an issue raised that was more appropriate for implementation stage (eg 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). (All)
- There should be a review of the policy in five years. (GTTS/SEC)
- LDF good practice guide in planning for GTTS accommodation would be useful. (SEC)

Agreed Assembly Response

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.

Noted.

No area is in principle 'unsuitable' for GTTS provided it is suitable in principle for general residential use. Green Belt exception sites may justifiable.

Noted. For the most part these are a combination of site management and LDF implementation issues to be addressed locally. Those of regional significance for implementation can be considered in policy wording.

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.

Noted. CLG have published site (design) guidance. The following may also be useful: Providing Gypsy and Traveller sites: contentious spaces (Joseph Rowntree Foundation, 2007).

The South East England Regional Assembly was dissolved on Tuesday 31 March 2009 and replaced by a Partnership Board comprising members of South East England Councils and the South East England Development Agency.

For more information see www.southeast-ra.gov.uk

The content of this document was agreed by the Assembly on Wednesday 4 March and it has been published by the South East England Partnership Board.

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