

**REGIONAL SPATIAL STRATEGY
SINGLE ISSUE REVIEW
PLANNING FOR GYPSY & TRAVELLER ACCOMODATION
CONSULTATION ON OPTIONS & ISSUES**

(Joint Report by Head of Planning Services and Head of Housing Services)

1 INTRODUCTION

- 1.1 The East of England Regional Assembly has published the Issues and Options document for the first stage of public participation on developing a policy within the Regional Spatial Strategy (RSS) to address the accommodation needs of Gypsies and Travellers. The consultation period runs until 31st July 2007.

2 BACKGROUND

- 2.1 The Government's Circular 01/2006 (in para 23) requires the RSS to identify the number of pitches needed (but not their location) for each local planning authority in the light of local Gypsy and Travellers Accommodation Assessments (GTAA's) and a strategic view of needs across the region. The current RSS, which is at the Proposed Changes stage with adoption due later this year, does not address this matter and that is why a single issue policy review is needed.
- 2.2 In coming to a strategic view of needs across the region, EERA commissioned research to reconcile the various Gypsy and Traveller Accommodation Assessments (GTAA's) which have been or are being prepared. The GTAA for the wider Cambridge Sub-Region was published in May 2006; it identified that the need in Huntingdonshire for the period to 2011 is for an additional 15 to 25 pitches. The GTAA identified that in Huntingdonshire at the time of the survey (2005) there were 20 pitches (with a capacity for 36 caravans) on the County Council owned site at St. Neots, while the average number of unauthorised caravans 2002-2004 was 14 caravans. This was reported to Cabinet on 29th June 2006.
- 2.3 The Council is committed to prepare a Development Plan Document (DPD) for Sites for Gypsies and Travellers and the programme for it is set out in the Local Development Scheme. The programme reflects the need to ensure that the DPD is consistent with the RSS policy and policies in the Core Strategy. Consistent with Government Guidance as set out in Circular 01/2006, this Council has recently granted temporary planning permission for a number of pitches. These are sites which could potentially be options for allocations in the Development Plan Document (DPD). If they are translated into allocations, which could then be granted permanent planning permission, they would count towards the

requirement of 20 additional pitches. Any permanent permission for pitches granted ahead of the DPD would also count towards this requirement.

3 THE RSS ISSUES AND OPTIONS DOCUMENT

- 3.1 The consultation document poses a number of questions in respect of the issues and options that are set out in Appendix A together with a recommended response.
- 3.2 The consultants for EERA developed a methodology to establish need across the region, taking into account published GTAAs. They have devised a formula to assess need where a GTAA is not in existence and to benchmark existing GTAAs. This has led to the assessment that 1,220 net additional residential pitches are required for the five years 2006 to 2011. For Huntingdonshire it proposes an additional 20 pitches (which is consistent with the Cambridge Sub-Region's GTAA estimate of 15-25 pitches).
- 3.3 The document also considers whether it is possible to forecast needs beyond 2011. This could be done through using a compound growth rate of 3% either to 2016 or 2021. Although EERA proposes a further general review of the RSS to be adopted by 2011, this is unlikely to be significantly later than the adoption of the single policy for Gypsies and Travellers, and therefore the general review provides no real opportunity to revisit provision.
- 3.4 The next section of the document considers issues and options for the distribution of pitches within the region. Two options are put forward: the first would accommodate need where it arises, while the second proposes that each local council area should provide at least 15 additional pitches over and above the existing number of pitches.
- 3.5 The document then considers issues of delivery and implementation. It considers provision by local councils/registered social Landlords, by Gypsies and Travellers or private landlords or by the development industry secured through S106 Agreements.

4 Recommendation

- 4.1 It is recommended that the responses set out in Appendix A be approved as the formal response of the Council.

Background Papers:

Planning for Gypsy & Traveller Accommodation in the East of England: Issues & Options Consultation Document; *East of England Regional Assembly, May 2007.*

Planning for Gypsy and Traveller Caravan Sites, Circular 1/2006, ODPM February 2006.

Cambridge Sub-Region Traveller Needs Assessment; Anglia Ruskin
University/Buckinghamshire Chilterns University College, May 2006.

CONTACT OFFICER - enquiries about this report to Richard Probyn (Planning Policy
Manager), on 01480 388430 or Steve Plant (Head of Housing Services) on 01480
388240.

APPENDIX A

Planning for Gypsy and Traveller accommodation in the East of England: Issues and Options.

Recommended Responses from Huntingdonshire District Council

Q1. Do you think 1,220 net additional residential pitches is a reasonable estimate of the level of unmet need for residential pitch provision taking into account how this may change over the period until 2011?

Recommended Response:

The Cambridge Sub-Regional GTAA is a robust and carefully worked detailed assessment and the Council accepts the number of pitches it suggests for Huntingdonshire. The wider regional figures, based on research undertaken by CLG, which includes estimates where such detailed assessments may not be in place, is considered to be the best evidence available and the Council has no evidence to question them.

Q2. If you think 1,220 net additional pitches is not a reasonable estimate of need what alternative level do you think is a more reasonable estimate of need at 2011? Please make clear why.

Recommended Response:

The Council considers there is no evidence to suggest that 1,220 net additional pitches is not a reasonable estimate of need.

Q3. On the basis of information currently available is it helpful if the RSS revision seeks to establish policy on the level of need for transit pitches? And, if so, would it be more helpful to distinguish this provision from the need for residential pitch provision in policy.

Recommended Response:

The Cambridge Sub-Region GTAA considered that there are difficulties in establishing the need for transit sites, and that in practice the distinction between transit and residential sites becomes blurred over time with transit sites becoming long-stay over time. The GTAA therefore provides only very limited evidence of this aspect of need. The Council therefore sees little point in trying to establish this in policy in the RSS.

There are also considerably more difficulties over management of such sites for a number of reasons including high turnover, non-payment of rent, vandalism of facilities, anti-social behaviour, complaints from neighbouring land users, conflict between different occupiers and difficulty in enforcing maximum length of stay. Transit sites tend to be sought by G&Ts along the main road routes.

The Council considers that such need is best served by pragmatic decisions taken locally. The need for short-term provision may be better met through the use of emergency stopping places.

Q4. Should this revision seek to establish policy on the level of pitch provision beyond 2011? If so, what assumptions should this be used to do this and until what year should they be applied?

Recommended Response:

The Council notes that the I&O document points to a number of studies which suggest an 3% annual compound growth rate, but the CLG consultants do not endorse this strongly pointing to the difficulties of establishing longer-term needs. If a 3% compound growth rate is used, the Council assumes that this is based on the total number of G&T households in the District once the pitch provision need at 2011 has been met. There are great difficulties in translating this somewhat dubious level of need into sound evidence for specific site allocations in a DPD. The District Council therefore considers that there is no sound evidence base for the RSS Policy to establish policy on the level of need beyond 2011.

The difficulties of predicting in the longer term are compounded by potential changes within the G&T community as they become more settled and their children receive education, so their aspirations are likely to change. This points to the need for additional survey and research.

There are also difficulties in establishing what end date should be used, 2016 or 2021. The Council is unsure as to the implications for G&T housing of the requirement of PPS3 that a 15 year supply should be identified to cover the period from the date of the adoption of the Core Strategy (or indeed the G&T DPD).

Q5. To what extent is it reasonable to seek to spread the distribution of pitches from the Council areas where need is calculated to arise? Will a more dispersed distribution still meet the needs of G&Ts? Would a different pattern of dispersal seeking to re-distribute provision from areas of greatest need into nearby council areas be more appropriate than option 2?

Recommended Response:

The Council is firmly of the opinion that need should be met where need arises. To try to influence the location of Gypsies and Travellers into areas where they do not wish to go will simply continue existing problems of unauthorised encampments and unauthorised developments in those areas favoured by Gypsies and Travellers. Consideration should be given to the reasons why Gypsies and Travellers prefer to locate in certain areas. This may be cultural tradition or the need to gain access to appropriate employment, such as

seasonal agricultural work, areas suitable for the breeding of horses and ponies or recycling of material and scrap metal dealing. Where it is agricultural, sites will need to be in areas of appropriate agriculture where seasonal workers are in high demand (such as Fenland); where work is based on recycling of materials sites are likely to be needed in close proximity to large urban centres (as is the case with sites around Cambridge and Peterborough).

The principle of meeting housing need where it arises is a key current planning policy for the Cambridge Sub-region which has replaced a previous and discredited policy of trying to disperse housing to areas where the need was lower; the same principle should be applied to the housing needs of Gypsies and Travellers.

It is more appropriate for Local DPDs to consult at the local level on the location of site provision which would meet local needs in an appropriate way

Q6. Is it reasonable to accept the principle that each local council area should seek to provide at least one additional site?

Recommended Response:

No, for the reasons set out in the response to Q5.

Q7. In the light of the above consideration of locational issues, is there any evidence to suggest that any council area within the East of England could not make provision for a level of pitches in the order of that shown in the two illustrative options without having an adverse impact on areas of recognised environmental importance? Are there any other environmental or policy constraints that may be so significant to influence the distribution of pitches between council areas?

Recommended Response:

This will be a matter for each individual council to comment upon in the light of its own knowledge of local circumstances; it is not appropriate for Huntingdonshire to speculate about the capacity of other council areas. The Council considers that there are no overriding constraints or environmental factors which would lead it to be unable to identify sites for the level of need suggested in the RSS Options & Issues document at Options 1 and 2 of 20 pitches in Huntingdonshire.

Q8. To what extent is it reasonable to rely upon the delivery of sites either by Gypsies and Travellers themselves or by the development industry?

Recommended Response:

There is evidence that Gypsies and Travellers prefer to buy their own sites and manage them themselves, particularly small family sites. It is considered that this could satisfy a considerable proportion of the need. However, councils should be given considerable flexibility to establish locational and site requirements criteria

appropriate for their local council area, particularly with regard to “sustainable” locations.

At the same time there will be a need for local authority/registered social landlord sites for those unable to buy their own sites. The Government must allocate sufficient funds to local authorities to enable them to undertake this provision and to ensure adequate management and maintenance. The Council notes that Luminus, a local RSL, wishes to extend its current site at St. Neots.

The Council is extremely sceptical that the development industry would be eager to develop or contribute towards sites for Gypsies and Travellers, given land values.

Q9. In view of the potential scale of pitch provision in the east of England and constraints on public funding available is it reasonable to suggest that most of the need identified is likely to have to be met by provision on “exception” sites or other sites that would not normally be granted planning permission for other forms of housing?

Recommended Response:

The Council considers that it is unrealistic to expect sites to be provided on land where the alternative is traditional housing as the land values will exclude Gypsies and Travellers from buying land at such values. Local authorities and Registered Social Landlords would also face similar difficulties on the open market. It is therefore almost inevitable that most sites which are not allocated in a Development Plan Document (DPD) will come forward in locations where planning policies would not permit housing for the settled community (ie “as exceptions”). In these circumstances councils should be given flexibility in determining appropriate locational criteria for such sites in terms of sustainability, as suggested in the answer to Q8.

In preparing its DPD for Gypsy and Traveller sites, the District Council will be seeking agreement with the Gypsy and Traveller community and willing landowners. The agreed sites would then be allocated for that use which should result in appropriate land values, as the land would not be in competition with other forms of housing. However, it is too early in the process to assess what proportion of the total requirement in Huntingdonshire will be met by allocated sites as opposed to those coming forward on unallocated land as “windfalls” which will be in “exception” locations.

Q10. In view of the scale of potential need for new sites identified, is there a need to develop new means of providing Gypsy and Traveller sites, such as through the establishment of some form of specialist delivery organisation?

Recommended Response:

The creation of yet another delivery vehicle is to risk increased bureaucracy with less local accountability. Delivery is better vested in the Gypsy and Traveller communities and local authorities properly supported by Government funding.

Q11. In the light of the proposed draft Circular is it appropriate for the revision to seek to identify the number of pitches that should be provided in each council area to meet the needs of Travelling Showpeople separately from those to be provided to meet the needs of Gypsies and Travellers? If so, what evidence is available to inform this and what other issues should be taken into consideration?

Recommended Response:

The Cambridge Sub-Region GTAA did not find evidence of specific need. Such need is likely to be very specific to a few sites and the Council considers that this is a matter better addressed in local DPDs rather than at a regional level.