

**SOUTH EAST ENGLAND REGIONAL ASSEMBLY
REGIONAL PLANNING COMMITTEE**

Date: 26 September 2007

Subject: **South West Gypsy and Traveller Partial Draft Revision
Submission Consultation**

Report of: Director of Planning

Recommendations:

1. That the Committee notes the consultation and supports the production of a partial revision to the South West Regional Spatial Strategy (RSS) in relation to the provision of accommodation needs of Gypsies and Travellers within the South West.
2. That the Committee agrees the submission of representations to address the minor concerns, included in Annex I, with the Gypsy and Traveller draft revision document.

Purpose of Report:

To provide an overview of the South West of England Regional Assembly's (SWERA's) Gypsy and Traveller draft RSS revision submission document; and to recommend the Assembly's response.

Key Issues:

In accordance with Government guidance SWERA is taking forward an early partial review of the South West RSS in respect of accommodation needs of Gypsies and Travellers. SWERA have submitted their draft revision document to Government which includes distributions for permanent and transit pitches.

The extent to which the SWERA have developed their draft revision document using the CLG methodology, developed to assist Regional Planning Bodies (RPB) develop partial reviews in this respect, is unclear. This CLG methodology has been rolled out nationally and is the methodology already used by the East of England Regional Assembly (EERA) and the methodology we will be use to inform our Partial Review document for the South East.

The SWERA draft revision submission document includes pitch requirement figures for both permanent and transit accommodation. However, it is acknowledged by CLG, leading academics, and technical officers that assessing transit accommodation needs is difficult until significant progress has been made to address permanent pitch provision.

The SWERA draft submission document does not include provision for Travelling Showpeople. However, Circular 04/2007: Planning for Travelling Showpeople requires partial reviews to include provision for Travelling Showpeople pitch requirements or at least include a regional contextual statement of accommodation needs.

We are therefore propose to submit representations to the partial revision consultation to address the following minor issues:

- Express concern regarding the extent to which a strategic view has been taken given the over reliance on a small number of districts to meet a significant proportion of the region's accommodation needs.
- Recommend that the final RSS revision document should include indicative pitch figures for the period 2011 to 2016 to provide longer term policy guidance.
- Recommend that greater emphasis be placed on the requirement on local authorities to provide the pitch numbers identified in the RSS.
- Support the proactive approach to identify transit pitches for each local authority within the South West, but comment that a more indicative and regional approach may be appropriate given data uncertainties.
- Recommend that the final partial review document should include pitch requirements for Travelling Showpeople for each local planning authority, or at least an interim regional statement of their accommodation needs.

1. Introduction

- 1.1 The South West region has the third highest number of caravans behind the East of England and the South East. According to the CLG January 2007 Caravan Count data the South West contained 2,247 Gypsy and Traveller caravans, 14% of all Gypsy and Traveller caravans in England. In comparison, the South East has the second greatest concentration with 2,895 Gypsy and Traveller caravans (17% of all Gypsy and Traveller caravans in England). A breakdown of all regions is included in Annex 2. A direct comparison can not be made between number of caravans and number of pitches as more than one caravan can be sited on one pitch.
- 1.2 Circular 01/2006 'Planning for Gypsy and Traveller Caravan Sites' requires Regional Planning Bodies (RPBs) to identify within their RSS the number of pitches required (but not their location) for each local planning authority in the light of local authority Gypsy and Traveller Accommodation Assessments (GTAAAs) and a strategic view of needs across the region.
- 1.3 The final Circular was published in February 2006, two months prior to the submission of the draft South West RSS to Government in April 2006. There was insufficient time for the draft RSS to accommodate the Circular's requirements. SWERA is therefore undertaking a single issue partial revision bringing the RSS into line with Government policy.
- 1.4 In July 2007 SWERA submitted their 'Draft Regional Spatial Strategy revision (Gypsies and Travellers)' to Government. The draft revision proposes revised text and policies to the draft South West RSS submitted in April 2006. A copy of the revised text and policies is included in Annex 3. The submission draft revision consultation closes on 31 October 2007. An Examination in Public is anticipated in spring 2008.

2. Partial Review Process

- 2.1 Planning Policy Statement (PPS) 11: Regional Spatial Strategies outlines that regional planning bodies (RPBs) should involve, Government Office, other stakeholders and the public in developing and refining options regional planning bodies.
- 2.2 SWERA has not undertaken a preferred options public consultation prior to submission. We understand the decision to go straight to submission was taken following discussions with the Government Office for the South West. A pre-submission consultation statement was submitted alongside the draft revision document, this statement outlines that SWERA consulted the Gypsy and Traveller community; local planning authorities, county, unitary and national park authorities and other key stakeholders. The statement notes that a number of members of public attended their stakeholder events.

- 2.3 We are of the opinion that our approach as set out within the Partial Review Project Plan (December 2006), which includes an additional, formal 'issues and options' public consultation stage between May-July 2008, is the most appropriate, consultative and robust approach to ensure that the requirements set out within PPSI I are fully satisfied.

3. Policy Formulation

- 3.1 The Circular requires RPBs, when identifying pitch numbers, to undertake a strategic view of needs across the region. SWERA were part of the CLG steering group¹ who commissioned a piece of work to develop a methodology and approach for translating GTAA's into RSS partial reviews². The purpose of the CLG research was to ensure that there was a nationally consistent approach for developing the RSS partial reviews.
- 3.2 The CLG guidance outlines a number of factors and issues RPBs should take into consideration when undertaking their strategic view of needs across the region; one of these is 'equity and choice'. GTAA's generally identify requirements based on current provision - needs directly generated from existing sites. The CLG guidance puts forward strong arguments for seeking to diversify provision beyond areas of current provision. The guidance states that the RSS strategic pitch allocation process provides an opportunity to achieve a wider spread of authorised site provision. However, the guidance also outlines arguments for ensuring sufficient pitches for Gypsies and Travellers who wish to continue to live on or near current provision.
- 3.3 The extent to which a strategic view of needs across the South West region has been undertaken is unclear. There are a number of authorities within the region with significant pitch requirements and where neighbouring local authorities have small or zero requirements. Concern is raised that if pitch requirements are not met within these highly reliant districts, or that these pitches are not located within Gypsy and Traveller aspirational locations, then a significant proportion of the regions Gypsy and Traveller accommodation needs may not be delivered. This could potentially increase pitch pressures in authorities outside the region, such as the South East, through out migration.
- 3.4 PPSI I states that RSS's should cover a time period of between 15 to 20 years. GTAA's cover a time period of only five years. In relation to Gypsy and Traveller accommodation needs it is difficult to reliably project forward beyond the GTAA's period as no historic population information on which to base projections exists. However, the CLG research provides a growth rate formula based on past academic Gypsy and Traveller population growth study findings. This formula enables RSS partial reviews to project forward GTAA findings beyond the GTAA five year period.

¹ The steering Group consisted of South East, South West, East of England Regional Assemblies, their respective Government Offices' and CLG.

² Niner P et al, March 2007, "Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies2.

- 3.5 The South West draft revision document only covers the five year period 2006-2011. Although this approach is based on robust GTAA evidence it does not provide longer term certainty for local development frameworks or guarantee pitch provision within the region beyond the five year RSS period. We consider providing certainty of site and pitch delivery beyond 2011 to meet the South West's future Gypsy and Traveller population growth accommodation needs is vitally important. A revision period of ten years would align with LDF time periods. The South West draft revision should therefore include indicative pitch figures for at least the period 2011 to 2016 based of the GLG guidance formula, with a commitment to monitor and review.

4. Policy Wording and Reasoned Justification

- 4.1 Circular 01/2006 states that “local authorities must [emphasis added] allocate sufficient sites for Gypsies and Travellers, in terms of the number of pitches required by the RSS...” However, the wording of Policy GT1 of the submission policy states that “local authorities should [emphasis added] identify realistically deliverable sites in their DPDs to provide for about 1,600 additional pitches...”
- 4.2 To ensure sufficient sites are provided within the South West region to meet the region's identified Gypsy and Traveller accommodation needs the policy wording could be stronger to fully align with the Circular. Insufficient RSS policy weight on the allocation and deliverability of sites within the South West could result in increased pressures for Gypsy and Traveller accommodation outside the region through migration to other regions such as the South East.

5. Transit Accommodation

- 5.1 SWERA draft revision document includes pitch numbers for each local authority for both permanent and transit accommodation. Our officer work taking forward the South East Partial Review has concluded that it is not possible to robustly assess transit accommodation need until significant progress has been made to address the permanent pitch provision. An unknown extent of existing transit provision is currently being used on a more permanent basis due to permanent pitch shortfalls. Furthermore the nature of Gypsy and Traveller transit pitch requirements and travel patterns have and are changing due to factors such as employment diversification and an increasing preference for a 'permanent base' to improve access to education and services.
- 5.2 As such the South East Partial Review document will not seek to identify the number of transit pitches required for each local planning authority but include a regional statement of need, and only where robust evidence supports, sub-regional context statements on transit accommodation needs. Our position has been endorsed by CLG and Government Office for the South East (GOSE) and is the same approach being taken by the East of England Regional Assembly.

- 5.3 Although we support the proactive approach that SWERA have taken towards seeking to identify the number of transit pitches required for each local planning authority we raise concern over the robustness of the proposed pitch requirement, particularly as 10 of the 48 authorities (21%) have only estimated transit pitch figures, not pitch figures based on final evidence. The reliance on estimated evidence may result in the delivery of sites and pitches in the wrong location which might not meet the regions transit accommodation needs. This may result in increased pressures for Gypsy and Traveller accommodation outside the South West though out migration and short stay stopping in other regions such as the South East.

6. Travelling Showpeople

- 6.1 In January 2007, GLC revised the definition of Gypsies and Travellers for the purposes of undertaking GTAAs to include Travelling Showpeople. At the same time CLG also published a consultation document on revised planning guidance in relation to Travelling Showpeople. Although a draft document CLG encouraged, where timetables allowed, the current round of Gypsy and Traveller partial reviews to include plot numbers for Travelling Showpeople for each local authority. However, where this is not possible the draft guidance outlined that RSS revisions should set out interim arrangements through a clear contextual statement of regional Travelling Showpeople accommodation needs. Circular 04/2007 Planning for Travelling Showpeople was published in final form in August 2007. These requirements remain within the final Circular; albeit that the SWERA draft partial revision was submitted to Government prior to the publication of the final Circular.
- 6.2 CLG and GOSE have confirmed to us that they are expecting the South East Partial Review to identify the number of Travelling Showpeople pitches required (but not their location) for each local planning authority. Assembly officers have been working closely with local authorities and the Showmen's Guild of Great Britain to ensure that we will satisfy this requirement.
- 6.3 On this basis we would expect the South West draft revision document to include plot requirements for each local planning authority or at least an interim regional context statement in accordance with the Circular. We raise concern if the South West revision document in final form does not include any policy context for Travelling Showpeople accommodation provision as this may result in increased pressures for Travelling Showpeople accommodation outside the South West though out migration to other regions such as the South East.

7. Conclusions and Recommendations

- 7.1 It is recommended that the Assembly notes the consultation and supports the production of a partial revision to the South West Regional Spatial Strategy (RSS) in relation to the provision of accommodation needs of Gypsies and Travellers within the South West.

- 7.2 It is recommended that the Assembly agrees the submission of representations to address the minor concerns, included in Annex I, with the Gypsy and Traveller draft revision document.

Catriona Riddell
Director of Planning

11 September 2007

Contact: Dominick Veasey, Regional Planner
Tel: 01483 555201
Email: dominickveasey@southeast-ra.gov.uk

Representations to be submitted to the South West Gypsy and Traveller draft partial revision submission document

1. Express concern regarding the extent to which a strategic view has been taken given the over reliance on a small number of districts to meet a significant proportion of the region's accommodation needs.
2. Recommend that the final RSS revision document should include indicative pitch figures for the period 2011 to 2016 to provide longer term policy guidance.
3. Recommend that greater emphasis be placed on the requirement on local authorities to provide the pitch numbers identified in the RSS.
4. Support the proactive approach to identify transit pitches for each local authority within the South West, but comment that a more indicative and regional approach may be appropriate given data uncertainties.
5. Recommend that the final partial review document should include pitch requirements for Travelling Showpeople for each local planning authority, or at least an interim regional statement of their accommodation needs.

CLG Gypsy and Traveller Caravan Count Data – January 2007

Region	Total All Caravans	Percentage
East	4,163	25%
South East	2,895	17%
South West	2,247	14%
West Midlands	1,714	10%
Yorkshire and Humber	1,482	9%
North West	1,441	9%
East Midlands	1,317	8%
London	803	5%
North East	549	3%
England	16,611	100%

South West Submission Draft Policy and Reasoned Justification Wording

1. Under the provisions in the Housing Act 2004, local authorities are required to consult with, and consider, the accommodation needs of Gypsies and Travellers in their areas and outline in their housing strategies how any identified need will be met.
2. Circular 01/2006 Planning for Gypsies and Traveller Caravan Sites (February 2006) requires Local Planning Authorities to establish criteria for the location of Gypsy and Traveller sites in their Core Strategies as a guide to the specific allocation of sites in the relevant Development Plan Document (DPD). The circular requires local authorities to assess Gypsy and Traveller accommodation needs as part of the Gypsy and Traveller Accommodation Assessment (GTAA) process and to consult on those assessments with Gypsies and Travellers, both housed and travelling. The GTAA process has informed the RSS in terms of an overall assessment of need. In some locations it is expected that further transit provision will be phased in once significant progress at the local level has been made in meeting the need for residential pitches.

Policy GT1 Gypsy and Traveller Pitch Requirements:

Local authorities should identify realistically deliverable sites in their DPDs to provide for about 1,600 additional pitches for Gypsies and Travellers in the region, over the period 2006-2011, distinguishing between residential and transit pitches, to deliver the distribution of pitches contained in Table 4.3

Table 4.3

Table 4.3 Housing Market Areas, Unitary Authorities and Districts: Gypsy and Traveller Additional Pitch Requirements to 2011		
	Residential Pitch Requirement	Transit Pitch Requirement
West Of England Housing Market Area Bath & North East Somerset Bristol City North Somerset South Gloucestershire West Wiltshire Mendip	207 - 227 18 estimate 14 - 34 estimate 45 estimate 74 estimate 7 fdp 49 fdp	47 n/a n/a 17 estimate n/a 0 fdp 30 fdp
Gloucester Cheltenham Housing Market Area Cheltenham Gloucester Tewkesbury Cotswold Forest of Dean Stroud	193 0 estimate 14 estimate 122 estimate 15 estimate 25 estimate 17 estimate	n/a n/a n/a n/a n/a n/a n/a
Swindon Housing Market Area Swindon North Wiltshire Kennet	31 7 fdp 24 fdp 0 fdp	12 0 fdp 12 fdp 0 fdp
Salisbury District & Housing Market Area	9 fdp	0 fdp
Bournemouth & Poole Housing Market Area Bournemouth Poole Christchurch East Dorset Purbeck North Dorset	227 28 fdp 35 fdp 33 fdp 50 fdp 44 fdp 37 fdp	261 20 fdp 13 fdp 27 fdp 38 fdp 35 fdp 128 fdp
Weymouth & Dorchester Housing Market Area West Dorset Weymouth & Portland	44 44 fdp 0 fdp	65 36 fdp 29 fdp
West Cornwall Housing Market Area Kerrier Carrick Penwith Restormel	135 30 fdp 24 fdp 13 fdp 68 fdp	25 5 fdp 10 fdp 5 fdp 5 fdp
Isles of Scilly	0	0
Polycentric Devon & Cornwall Housing Market Area North Cornwall Torridge North Devon	29 0 fdp 24 fdp 5 fdp	20 10 fdp 5 estimate 5 estimate
Exeter Housing Market Area Exeter East Devon Teignbridge Mid Devon	100 12 fdp 9 fdp 65 fdp 14 fdp	20 5 estimate 5 estimate 5 estimate 5 estimate
Plymouth Housing Market Area Plymouth City South Hams Caradon West Devon	109 40 fdp 51 fdp 12 fdp 6 fdp	30 15 estimate 5 estimate 5 fdp 5 estimate
Dartmoor National Park	0 fdp	0 fdp
Torbay Unitary Authority & Housing Market Area	0 fdp	5 estimate
South Somerset District & Housing Market Area	17 fdp	10 fdp
Taunton Housing Market Area Taunton Deane Sedgemoor West Somerset	35 17 fdp 15 fdp 3 fdp	0 0 fdp 0 fdp 0 fdp
Exmoor National Park	0 fdp	0 fdp
TOTAL	1,136 - 1,156	460
<p><i>fdp - First Detailed Proposals (advice provided by County, Unitary and National Park Authorities)</i></p> <p><i>estimate - Technical estimates provided by County and Unitary Authorities</i></p> <p><i>n/a - First Detailed Proposals/technical estimates not available</i></p>		