

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

Summary of Responses	Proposed Assembly Response
<b>Qn 3&amp;4. Views on the proposed level of provision for Gypsies and Travellers (regional and county figures)</b>	
<ul style="list-style-type: none"> <li>The proposals are about right as they reflect GTAA evidence, is the best information currently available and is compiled with G&amp;T input.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
<ul style="list-style-type: none"> <li>The assessments are too high and identify aspirations not actual need.</li> </ul>	<ul style="list-style-type: none"> <li>This is a methodology issue for councils at GTAA stage, and was not identified as a problem in benchmarking</li> </ul>
<ul style="list-style-type: none"> <li>The proposals are too high, the South East is already over-populated; providing additional sites would encourage either G&amp;T in-migration, or others into this lifestyle.</li> </ul>	<ul style="list-style-type: none"> <li>Provision will be increased in all regions so should not stimulate migration. The total G&amp;T requirement is a very small fraction of that for standard housing and the SA concludes it can be sustainably accommodated.</li> </ul>
<ul style="list-style-type: none"> <li>Provision should be much higher or unlimited, and any surplus could be used by non G&amp;Ts.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>GTAAs underestimate need as acknowledgement in full would not be politically expedient. The proposed level of provision is a conservative minimum estimate and a number of GTTS noted that they had not been counted in the GTAAs.</li> <li>Estimates are too low to meet currently unmet need. The level of, and growth rate, in unauthorised sites suggests the situation will get worse as families grow, and assessments may have overlooked or missed 'hidden' G&amp;T in need. Similar general comments were made about all areas at county level.</li> </ul>	<ul style="list-style-type: none"> <li>The process and methodology is new, and whilst unlikely to be perfect the GTAAs have sought to involved GTTS communities - of necessity by sampling rather than interviewing the full community. Supplemented by local council knowledge, this is the best information currently available to the Assembly. Backlog, unauthorised encampment levels and family growth all form part of the GTAA assessment methodology. Hidden need is by definition unquantifiable - over time as the process delivers those in hidden need may gain the confidence to make their needs known.</li> </ul>
<ul style="list-style-type: none"> <li>The E Sussex figures, particularly in coastal towns and cities, were criticised as being too low - based on known families in need and families in housing specifying they wish to return to a site.</li> <li>W Sussex figure does not account for growth and fluctuation in New Traveller population.</li> </ul>	<ul style="list-style-type: none"> <li>Noted but it is unclear the extent to which this represents additional need or need already assessed in the GTAA</li> </ul>
<b>Qn 5&amp;6. Views on the proposed level of provision for Showpeople (regional and county figures)</b>	
<ul style="list-style-type: none"> <li>The figures reflect the available evidence, including the needs assessments.</li> </ul>	<ul style="list-style-type: none"> <li>Noted, although benchmarking has clear limitations.</li> </ul>
<ul style="list-style-type: none"> <li>Showpeople figures supported except in Thames Valley, but as a minimum and starting level of provision.</li> </ul>	<ul style="list-style-type: none"> <li>Noted.</li> </ul>
<ul style="list-style-type: none"> <li>The robustness and completeness of the evidence base, including the GTAA/TSAA methodologies, is not sufficiently clear to draw a conclusion or is considered unsound (i.e. double counting).</li> </ul>	<ul style="list-style-type: none"> <li>The data is the best currently available.</li> </ul>
<ul style="list-style-type: none"> <li>The demand for such a high number of sites was questioned in the context of declining and less frequent shows.</li> </ul>	<ul style="list-style-type: none"> <li>The Guild suggest this is offset by increasing business in other ride/show operations eg corporate/commercial events</li> </ul>
<ul style="list-style-type: none"> <li>The need element for 42 homeless families is questioned.</li> </ul>	<ul style="list-style-type: none"> <li>The Showmen's Guild have confirmed that they can provide details of the individual families at issue.</li> </ul>

<ul style="list-style-type: none"> <li>Unclear of the basis for, or oppose, the Hampshire figures, which are so much higher than elsewhere in total as well as relative to the base population. Further, the level of unauthorised sites in Hampshire is much higher than recorded in the GTAA.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>Due to local shortages, and existing overcrowding, the figures were considered low in a number of areas eg E Sussex, Bracknell, Southampton and Mole Valley.</li> </ul>	<ul style="list-style-type: none"> <li>Noted but in principle these issues should be taken into account in assessments. The Guild accept the relevant estimates as a minimum starting point.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. The figures are based on local needs assessments and reflect council advice, the Assembly's agreed basis for provision. In the absence of revised advice this is a technical matter for resolution at Examination in Public.</li> </ul>
<ul style="list-style-type: none"> <li>A recently completed needs assessment indicates a higher level of provision may be appropriate for Oxfordshire.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. Advice based on the TSAA results should be submitted.</li> </ul>
<b>Qn 8. Comments of preferred distribution option</b>	
<ul style="list-style-type: none"> <li>A number of respondents saw Opt A or B being similar and thus supported either, with many of the reasons given being the same. Likewise for Opt C or D.</li> </ul>	N/A
<ul style="list-style-type: none"> <li>Opt A would allow GTTS to be close to friends and families and it is where there is existing provision to meet their needs, as well as a degree of community integration. GTAA evidence is that most GTTS want to remain locally. Consequently, Opts C&amp;D may not address GTTS wishes and pitches might not be taken up.</li> </ul>	<ul style="list-style-type: none"> <li>Need evidence is but one of several material planning considerations. All options meet the same level of need. GTAAs struggle methodologically to address need from outside the study borders. The clear majority of GTTS consultation responses support wider redistribution. Redistribution only impacts on a modest proportion of assessed future need. Nor does it inherently require close family groups to disperse or be split up.</li> </ul>
<ul style="list-style-type: none"> <li>Support a fairer, redistributive approach to improve equality and spatial choice for G&amp;Ts otherwise new provision will be disproportionately concentrated in areas that have made provision in the past - particularly in respect to Kent and Surrey.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. Consultants results and East of England experience lends support in principle for a degree of redistribution</li> </ul>
<ul style="list-style-type: none"> <li>Opt A is preferable for TS sites as they tend to travel in large groups and need large sites, making redistribution infeasible.</li> </ul>	<ul style="list-style-type: none"> <li>The reasoning appears to reflect localised unauthorised encampments experience which is not considered representative. Showpeople tend to seek settled, privately-owned home sites from which to travel to pre-arranged shows.</li> </ul>
<ul style="list-style-type: none"> <li>Opt A opposed as it reinforces inequities in past provision and there is no evidence to identify if GTTS live where they do by choice or because of constraints to provision elsewhere.</li> </ul>	<ul style="list-style-type: none"> <li>Noted</li> </ul>
<ul style="list-style-type: none"> <li>Opt B is based on local sustainability considerations and is the most sustainable.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. SA indicates little difference between the options' impacts.</li> </ul>
<ul style="list-style-type: none"> <li>Opt B reflects evidence of need but also provides some choice of location to G&amp;Ts and shares responsibility for provision, including better sharing of the resources/services needed.</li> </ul>	<ul style="list-style-type: none"> <li>Noted</li> </ul>
<ul style="list-style-type: none"> <li>Opt C supported as it provides greater choice for GTTS, thus improving access to employment opportunities and other community facilities.</li> </ul>	<ul style="list-style-type: none"> <li>Noted, the majority of GTTS respondents concur.</li> </ul>

<ul style="list-style-type: none"> <li>• Opt C is more equitable to local authorities (and their residents) that have previously met their obligations to provide for GTTS, helping address past inconsistencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. Government seeks that responsibility for provision be shared more widely, but this is one of several material planning considerations.</li> </ul>
<ul style="list-style-type: none"> <li>• Opt D is the most balanced or fair option, allowing security in the existing area (including families able to stay together), but also some opportunity or freedom of choice to move to other areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>
<ul style="list-style-type: none"> <li>• Opts C and D could help avoid ghettos or overcrowding in certain districts, thus reducing problems with the settled community.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>
<ul style="list-style-type: none"> <li>• Options C&amp;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.</li> </ul>	<ul style="list-style-type: none"> <li>• Option C/D methodology was agreed by the Assembly and is set out in a briefing note. The underlying data is from published government sources. The criteria used are relevant environmental / planning considerations for meeting wider housing need, and in all cases no more than a third of locally arising need is reallocated elsewhere. Evidence from this public consultation is that a majority of GTTS favour some redistribution. An approach without agreed criteria that are relevant to planning would be more arbitrary. Redistribution is also based on assessed relative potential to accommodate pitches and wider opportunities for GTTS, not solely shifting provision responsibility from areas of high provision to areas with less.</li> </ul>
<ul style="list-style-type: none"> <li>• For TS, redistribution not supported. Especially for Kent, where it is impractical to redistribute a small number of plots across such a wide area where family groups tend to exceed the size of the allocation.</li> </ul>	<ul style="list-style-type: none"> <li>• Showmans Guild support widening provision in principle, and Showpeople tend to live in private yards in small/immediate family groups.</li> </ul>
<ul style="list-style-type: none"> <li>• A less arbitrary approach is needed to identify where the needs of the 42 homeless showpeople families should be met. Guild suggestion is that the needs should be met where they own the land they were evicted from, not distributed across the region.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. Eviction follows loss of appeals against refusal of planning permission for unauthorised developments. To do so would essentially reward purchase of inappropriate land.</li> </ul>
<ul style="list-style-type: none"> <li>• Kent CC propose an alternative to their own Option B advice. Further work in progress to resolve and issues with the allocation of Showpeople plots in North &amp; West Kent post 2011 (whole requirement allocated to Dartford).</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• No option supported due to extremity of local constraints justifying no provision / much reduced provision/greater redistribution/ local determination.</li> </ul>	<ul style="list-style-type: none"> <li>• 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 conclusion also reached by the Panel for the East of England GTTS review).</li> </ul>
<b>Qn 10. Alternative transit provision approaches</b>	
<ul style="list-style-type: none"> <li>• Include transit or visitor provision on new residential sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, LDF matter. An option for visitor accommodation, but potentially disruptive for residents to accommodate passing G&amp;T strangers.</li> </ul>
<ul style="list-style-type: none"> <li>• Use GTAA information. Where not available, areas concerned should undertake an assessment on a county or sub-regional basis. Further regional research including G&amp;T consultation or a detailed census/count of families was suggested</li> </ul>	<ul style="list-style-type: none"> <li>• The use of GTAA information accords with the proposed consultation approach, Count is to fill gaps. However, there will not be time to undertake additional assessments to inform advice to government.</li> </ul>

<ul style="list-style-type: none"> <li>• Round out Count data with local enforcement, police and TES information, some views Count data is unreliable and volatile.</li> </ul>	<ul style="list-style-type: none"> <li>• This should have formed part of GTAA's as it is part of the statutory duty on LAs to assess need under s.225 of the Housing Act 2004 (see also GTAA guidance para 22). The detailed information required is most readily available locally and/or via the GTAA process. A range of possible data has been examined regionally (where provided) and found to be very variable in terms of quality, coverage and detail, and found not regionally comparable. A pragmatic way forward is needed, and averaged time-series Caravan Count is at least consistently collected and available</li> </ul>
<ul style="list-style-type: none"> <li>• Each area should have a transit site, especially big towns; or be evenly distributed over the South East.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, but some correlation with the extent and location of need would be preferable.</li> </ul>
<ul style="list-style-type: none"> <li>• A number of additional data sources were suggested, such as unauthorised encampment records from the police and LAs, waiting list records, TES records, court records or demand from existing transit sites.</li> </ul>	<ul style="list-style-type: none"> <li>• SEERA has already sought police and LA enforcement records to round out Caravan Count data. Response and coverage was partial, and record keeping in different areas was not on a comparable basis and varies in detail and quality. No regionally meaningful conclusions could be drawn. Most areas lack transit sites altogether so cannot monitor demand in use.</li> </ul>
<ul style="list-style-type: none"> <li>• Take into account regional transit/migration patterns or locations where GTTS go to find work.</li> </ul>	<ul style="list-style-type: none"> <li>• Such information would be useful but does not yet exist. Regional research will be considered.</li> </ul>
<ul style="list-style-type: none"> <li>• There was support for a regional strategic provision of transit pitches, however others felt that this should be delegated to the county or sub-regional level.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. A way forward is proposed that combines elements of both.</li> </ul>
<ul style="list-style-type: none"> <li>• The emphasis should be on permanent residential provision to reduce transit site need, rather than the provision of transit sites.</li> </ul>	<ul style="list-style-type: none"> <li>• To meet the requirements of Circular 1/2006, transit provision also needs to be addressed - there is need for both.</li> </ul>
<b>Qn 11. Other needs not accounted for.</b>	
<ul style="list-style-type: none"> <li>• Housed G&amp;Ts are difficult to identify and thus their needs may not be fully reflected.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, a difficulty for all GTAA's with no obvious retrospective solution. For currently housed G&amp;Ts wanting a pitch, to some extent this may also be an issue of preference rather than need.</li> </ul>
<ul style="list-style-type: none"> <li>• Hidden travellers.</li> </ul>	<ul style="list-style-type: none"> <li>• Unquantifiable.</li> </ul>
<ul style="list-style-type: none"> <li>• European Gypsies.</li> </ul>	<ul style="list-style-type: none"> <li>• If permanently resident in the UK this should in theory be picked up in GTAA's.</li> </ul>
<ul style="list-style-type: none"> <li>• G&amp;Ts with horses and wagons, with specific needs for horses.</li> </ul>	<ul style="list-style-type: none"> <li>• Should be accounted for numerically in GTAA's. The specific nature and location of local provision is an LDF matter.</li> </ul>
<ul style="list-style-type: none"> <li>• New age travellers, need a network of temporary stopping places suitable to alternative lifestyles (i.e. not concrete sites).</li> </ul>	<ul style="list-style-type: none"> <li>• In theory should be accounted for in GTAA's, but it is difficulty to know the extent to which their needs have been identified. New Travellers were not included in Caravan Count data until mid 2007. To an extent transit/stopping places may meet some of any need un-quantified, if in suitable locations.</li> </ul>

<b>Qn 12. Comments on SEA / AA</b>	
<ul style="list-style-type: none"> <li>Each option has not been assessed on its own merits, casting doubts that the SA meets the statutory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>The assessments have been reviewed addressing the overstatement of some negative impacts for Options B to D. It is considered that at a regional scale there are no significant differences between the impacts of the four options. In particular, the impacts of Option B with new sites in the same general areas to where GTTS currently live, should be very similar to those of Option A. Potential negative impacts depend on implementation at the local level.</li> </ul>
<ul style="list-style-type: none"> <li>A re-consideration and further investigations concerning the impact on the fear of crime is necessary.</li> </ul>	<ul style="list-style-type: none"> <li>The contradictions related to the impacts on fear of crime and the inaccurate recommendations have been addressed.</li> </ul>
<ul style="list-style-type: none"> <li>The SA and HRA should have considered the in-combination effects of the SE Plan (housing numbers) and the four options for GTTS to highlight potential discrepancies between the options.</li> </ul>	<ul style="list-style-type: none"> <li>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 &amp; 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.</li> </ul>
<ul style="list-style-type: none"> <li>It is questionable that in areas with European sites (e.g. the Thames Basin Heath SPA) harm to such sites and its biodiversity can be ruled out.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<ul style="list-style-type: none"> <li>There are other environmental considerations that need to be taken into consideration, such as the provision of foul drainage infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>This is a matter for the identification of GTTS sites at local level.</li> </ul>
<ul style="list-style-type: none"> <li>The SA should include an explicit assumption against sites in Flood Zones 2 and 3.</li> </ul>	<ul style="list-style-type: none"> <li>The recommendation concerning the SA Objective on flooding has been amended accordingly.</li> </ul>
<ul style="list-style-type: none"> <li>It has to be recognised that different ethnic groups will not want to live on the same sites.</li> </ul>	<ul style="list-style-type: none"> <li>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).</li> </ul>
<ul style="list-style-type: none"> <li>The SA omits assessing the impact of the Showpeople proposals.</li> </ul>	<ul style="list-style-type: none"> <li>In the light of a lack of data an appropriate general allowance was made for Showpeople (and transit) requirements. As further data are now available the SA has been amended accordingly.</li> </ul>

<ul style="list-style-type: none"> <li>• The SA includes errors concerning figures from the CLG Caravan Count 2006 and the water supply situation within some districts.</li> </ul>	<ul style="list-style-type: none"> <li>• The errors have been corrected.</li> </ul>
<ul style="list-style-type: none"> <li>• Various individual locations/areas are unsuitable for GTTS sites or require further investigation.</li> </ul>	<ul style="list-style-type: none"> <li>• This is a matter for the identification of GTTS sites at local level.</li> </ul>
<b>Qn 13. Other comments</b>	
<ul style="list-style-type: none"> <li>• Recognition of the Gypsy way of life and identifying sites will improve community cohesion, however it is important that decision-makers are resolved to deal with any opposition.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>
<ul style="list-style-type: none"> <li>• Gypsies should be encouraged to integrate into wider society, adopting a settled lifestyle. Possibly being put into social housing.</li> </ul>	<ul style="list-style-type: none"> <li>• Those that wish to travel have a legally recognised human right to do so and to live in caravans/trailers.</li> </ul>
<ul style="list-style-type: none"> <li>• Building more sites could also free up Council houses occupied by GTTS who would prefer a site.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>
<ul style="list-style-type: none"> <li>• Some G&amp;Ts would prefer to live on their own land rather than council sites and there should be help for GTTS to buy land themselves.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> </ul>
<ul style="list-style-type: none"> <li>• There should be greater flexibility for genuine applications, including allowing unobtrusive sites with landowners consent or the ceasement of enforcement action until 60% of new pitches are provided.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. A local authority implementation matter</li> </ul>
<ul style="list-style-type: none"> <li>• Any outcome should reduce illegal parking and ensure swift action if illegal camps are set up, ending the contradiction of planning laws.</li> </ul>	<ul style="list-style-type: none"> <li>• Not a regional matter</li> </ul>
<ul style="list-style-type: none"> <li>• Underused sites should first be identified and considered before new sites are developed. Alternatively, some felt that sites should not be too large, which would help integration/community relations.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• Different GTTS and families have different needs and often don't get on.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> </ul>
<ul style="list-style-type: none"> <li>• It was commented that sites should not be in the Green Belt and/or sparsely populated, small rural communities.</li> </ul>	<ul style="list-style-type: none"> <li>• No area is in principle 'unsuitable' for GTTS provided it is suitable in principle for general residential use. Greenbelt exception sites may be justifiable.</li> </ul>
<ul style="list-style-type: none"> <li>• There were also a number of comments made that were site specific, or an issue raised that was more appropriate for implementation stage (e.g. putting pitches in housing developments, ensuring sites are safe, well maintained and managed to reduce problems (with local management groups set up, with GTTS representatives), with adequate on site infrastructure being provided and being located away from areas such as flood plains, motorways, dumps etc).</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. For the most part these are a combination of site managements and LDF implementation issues to be addressed locally. Those of regional significance for implementation can be considered in policy wording.</li> </ul>
<ul style="list-style-type: none"> <li>• There should be a review of the policy in 5 years.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>• LDF good practice guide in planning for GTTS accommodation would be useful.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. CLG have published site (design) guidance. The following may also be useful: <i>Providing Gypsy and Traveller sites: contentious spaces</i> (Joseph Rowntree 2007)</li> </ul>