

## Explanatory Note: Further Options for the Gypsies, Travellers and Showpeople partial review

- I. This note sets out the rationale for further pitch allocation options, describes how they were arrived at, and illustrates resultant pitch distributions by means of a worked example.

### Reasons for further options

2. There are five main, inter-related reasons to consult on further options:
  - i. South East outcomes: Options A and B<sup>1</sup> are identical at county grouping level. Furthermore we do not have complete coverage for Option B, and some Option A and B figures are not locally agreed. Without further options some authorities would offer just one figure for consultation, or two options which are almost the same.
  - ii. Procedural robustness: Government Office advice<sup>2</sup> is to test a reasonable range of strategic policy alternatives to meet sustainability requirements. There is a greater risk the process will be found unsound if options are unduly constrained at the outset.
  - iii. Government objectives: CLG guidance explicitly promotes widening responsibility for pitch provision including increasing supply and choice where there is little or no current provision. There are 21 local authorities in the South East that currently do not have any local authority or RSL pitches.
  - iv. Need assessment (GTAA) methodological limitations: GTAA methodology is known to forecast most need where there are existing population concentrations. Existing concentrations are often based on historic reasons which may have changed, and cannot be assumed to best represent where future provision should be made. Future provision needs to be responsive to future opportunities.
  - v. Patterns of provision: pitch provision sometimes differs widely between neighbouring authorities for no evident reason. GTAA methodology cannot establish whether there is any demand in a given area arising from outside the area surveyed. Hence advice submitted based on GTAAs would not address such differences. So there is no way of knowing whether the differences reflect actual gypsy and traveller needs and preferences, rather than, for example, the long-term consequences of an enforcement-led approach in one area compared to a provision-led approach in the other.

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<sup>1</sup> **Option A** - a distribution which seeks to meet identified needs where they arise as identified through the GTAA and the existence of unauthorised encampments

**Option B** - a distribution which seeks to protect and enhance the natural environment, including its biodiversity and landscape character whilst 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.

<sup>2</sup> Letter here: [http://www.southeast-ra.gov.uk/meetings/planning/2008/300108/agenda\\_item\\_5-annex\\_h\\_gose\\_letter.pdf](http://www.southeast-ra.gov.uk/meetings/planning/2008/300108/agenda_item_5-annex_h_gose_letter.pdf)

3. None of the above is intended to suggest that the current options A or B are 'wrong', nor that the further options are necessarily better. Rather that there needs to be a wider testing and evidence gathering through public consultation. The testing of genuine alternatives will ensure the eventual preferred option – which may be something else entirely - can be shown to be the best approach and robustly defended as such.
4. A common criticism of the further options is that they are not 'evidence based'. Four points in response:
  - i. GTAA evidence is a starting point not an endpoint, and has its own issues of quality and robustness;
  - ii. Most if not all authorities experience unauthorised camping. The travellers involved that lack a permanent site have the most pressing needs, but are the most difficult to reach in carrying out needs assessments. It is unlikely such groups are fully accounted for in every GTAA;
  - iii. Consultation will generate further evidence and improve our understanding; and
  - iv. The decision on an appropriate approach is not just a technical exercise, but - as with housing allocations - a political one. It is right and proper that a wider range of factors be taken into account.
5. The following quotes from regional guidance<sup>3</sup> illustrate these points and the challenges they raise at the regional level:

*“The limitations of current knowledge about Gypsies and Travellers and the complexities of the issues involved dictate that, at present, no method would be capable of producing an incontestable estimate of regional pitch requirements. The evidence from which such estimates and allocation decisions would be derived is simply not robust enough to ensure high levels of confidence about the accuracy and reliability of the results.*

*“RPBs need to generate pitch allocation options for consultation and sustainability appraisal before the preferred option is incorporated into the draft RSS. At this stage of the process there is no ‘technical’ answer based only on the needs or preferences of Gypsies and Travellers [ie GTAA’s alone]. These must be considered in a wider context so as to achieve a sustainable outcome which balances the needs of all communities within general planning principles.*

### **How the further options were developed**

6. The starting point for Options C/D was to analyse the most commonly used planning and sustainability criteria employed by local authorities in generating Option B Advice. The approach in Options C/D is representative of your prioritisation of the wider set of possible opportunities and constraints we asked you to consider in

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<sup>3</sup> *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies*, CLG March 2007, respectively p.18 and p.47 (insert added).

submitting advice on Option B. We then sought to represent the most important elements of opportunity and constraint in the simplest possible way.

7. The approach, including selection, weighting and combination of criteria, was discussed and refined through both the Gypsy and Traveller Partial Review Officer Task Group and the Steering Sub Group of the Regional Planning Committee. Regional Planning Committee in January 2008 supported the options – for the purposes of public consultation only. This is the basis on which they are recommended.

### **The further options**

8. The main difference to Options A and B is that the Options C/D distributions operate across, rather than just within, advice group areas, on the basis of the relative extent of opportunities and constraints (as defined below) in each authority.
9. The two variants respectively retain locally 50% (Option C) and 75% (Option D) of the Option B requirements set out in your advice<sup>4</sup>.
10. For simplicity, transparency and even-handedness between areas of different character the balance is reapportioned by equal weighting (hence averaging) between the two proxies. These are:
  - Land area free of major environmental constraints (total land area less 100% of SSSIs and floodrisk zones 2 and 3, and less 95% of greenbelt and AONB) - representing constraints to development and environmental protection priorities; and
  - Population at 2016 (the partial review end date), representing opportunities in the widest sense (as gypsies and travellers need access to services and employment, and these are more readily available in populous areas).
11. Both are expressed as a percentage of the regional total, and the two results averaged (averaged because it was agreed they be evenly weighted) to generate a percentage share of the total number of pitches to be reallocated, which is then added back to the proportion of Option B retained. The tables at Annex A show a worked example.

### **Resulting distributions**

12. Options C/D **do not** explicitly seek to redistribute pitches from areas of higher current provision to areas of lower provision 'by design'. Rather, to an extent they have that effect because some of the areas of lowest current provision are also comparatively less constrained and/or have a large general population.

### **Next Steps**

13. Proposals for consultation purpose will be considered by RPC on 21 May 2008 and decided by full Assembly at Plenary on 16 July 2008.

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<sup>4</sup> Tabulated here: <http://www.southeast-ra.gov.uk/meetings/plenaries/2008/050308.html>

## Annex A: Model Option C/D calculations

Table 1: Worked example of the construction and combination of redistribution proxies to obtain district redistribution share.

District	Typology	Total land area	Highly constrained land	Potential land	% total potential land	Population 2016	% total population	Redistribution share (even weighting)
		<b>A</b>	<b>B</b>	<b>C=A-B</b>	<b>D, PROXY #1</b>	<b>E</b>	<b>F, PROXY #2</b>	<b>G=50%D+50%F</b>
<b>Bristol</b>	Small potential area, large population	30,000	20,000	10,000	2%	400,000	36%	19%
<b>Jersey</b>	Small potential area, small population	30,000	20,000	10,000	2%	50,000	5%	3%
<b>Doncaster</b>	Medium potential area and population	120,000	20,000	100,000	19%	200,000	18%	19%
<b>Essex</b>	Large potential area, large population	240,000	40,000	200,000	38%	400,000	36%	37%
<b>Cumbria</b>	Large potential area, small population	240,000	40,000	200,000	38%	50,000	5%	22%
<b>TOTAL</b>		<b>660,000</b>	<b>140,000</b>	<b>520,000</b>	<b>100%</b>	<b>1,100,000</b>	<b>100%</b>	<b>100%</b>

Table 2: Worked example of Option D (75% of own requirement retained, 25% redistributed).

District	Pitch need	Share retained (Option D 75%)	Share for redistribution	% of total redistributed	Received share	Change	Option D pitch requirement
	<b>H</b>	<b>I = 75% of H</b>	<b>J = H-I</b>	<b>K=G</b>	<b>L = K% of 125</b>	<b>M=L-J</b>	<b>N=I+L</b>
<b>Bristol</b>	100	75	25	19%	24	-1	99
<b>Jersey</b>	100	75	25	3%	4	-21	79
<b>Doncaster</b>	100	75	25	19%	23	-2	98
<b>Essex</b>	100	75	25	37%	47	22	122
<b>Cumbria</b>	100	75	25	22%	27	2	102
<b>TOTAL</b>	<b>500</b>	<b>375</b>	<b>125</b>	<b>100%</b>	<b>125</b>	<b>0</b>	<b>500</b>