

CONSULTATION ON PARTIAL REVIEW OF THE REGIONAL PLANNING STRATEGY FOR THE SOUTH EAST: PROVISION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

1. PURPOSE OF THIS REPORT

- 1.1 In March 2009, the South East Regional Assembly (now dissolved and replaced by a South East Regional Planning Board) agreed for submission to the Government a recommended partial review of the Regional Planning Strategy regarding provision for Gypsies, Travellers and Travelling Showpeople. The Government has now published SEERA's recommendations for consultation. The submitted document includes proposals for new pitch provision at local authority level across the South East region. It includes a requirement for new pitch provision for New Forest District (including the National Park).
- 1.2 The response to the Government's current consultation will inform an Examination in Public (EIP) of the proposals which is due to be held in February 2010.

2. BACKGROUND

- 2.1 In 2006 and 2007 Government introduced new rules requiring all local authorities to allocate sufficient legal stopping places for Gypsies, Travellers and Travelling Showpeople. New provision is intended to reduce the incidents of unauthorised encampments, which can be a considerable cause of tensions within some communities. It is also intended to meet accommodation needs of, and improve the living conditions for, these recognised minority groups.
- 2.2 The Regional Assembly undertook a partial review of the South East Plan to:
- Address the under provision of legal stopping places;
 - Improve conditions for Gypsies, Travellers and Travelling Showpeople; and
 - Reduce unauthorised camping and development and the associated problems and costs.
- 2.3 The review identifies how many spaces are needed in each council area, but not the location of sites. Local councils are responsible for identifying suitable locations through their own Local Development Frameworks. Each council will have its own timetable, and its own public consultation arrangements for this process. New Forest District Council will address the additional provision it is required to make through its Sites and Development Management Development Plan Document, part of the Local Development Framework, work on which is currently underway. The Council's Core Strategy, which was recently examined by a planning Inspector, includes a criteria-based policy to guide the search for site allocations, as required.
- 2.4 To identify how much space is needed, local authorities have carried out Gypsy and Traveller and Travelling Showpeople Accommodation Assessments. New Forest District Council joined with other Hampshire Authorities, including Southampton and Portsmouth, and the Isle of Wight, in commissioning this work.

- 2.5 SEERA undertook a consultation in September 2008 on the total amount of provision proposed and four options for distributing the provision across the Region. A report was taken to Cabinet on 5th November 2008 where Members supported 'Option A' of the consultation which proposed provision based on the Council's own needs assessments. A formal response was made to SEERA on this basis. The requirement for New Forest District under Option A would have been 5 pitches for gypsies and travellers and 5 pitches for travelling showpeople for the period 2006-2016.
- 2.6 At its final meeting on 4th March 2009, SEERA formally agreed to recommend an option (Option D) for a level of redistribution across the region in order to seek a more 'balanced' pitch distribution. This approach stems from the results of the consultation on options, in which redistribution was favoured by the gypsy and traveller communities, and the publication of the Panel's Report relating to provision in the East of England which also favoured a redistributive approach in order to create greater equity of provision between different authorities in that region. Option C found most support in the consultation on options. However, the implications of Option C for Hampshire, which would require a 100% increase in provision for the County, resulted in SEERA recommending Option D as a compromise approach.
- 2.7 The recommended new Policy H7 of the South East Plan and Table H7a, which details pitch requirements for each local authority, is set out in Annex 1 to this report and is further explained below.

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3. IMPLICATIONS FOR THE DISTRICT OF THE POLICY H7 RECOMMENDATION

- 3.1 The SEERA recommendation is for the provision of 1,064 permanent residential pitches for gypsies and travellers and for 302 pitches for travelling showpeople across the South East. This provision is required for the period 2006-2016. The 2006-2016 requirement for New Forest District (including the National Park) is for 9 additional pitches for gypsies and travellers and 11 pitches for travelling showpeople. However, the actual proposed provision is significantly greater than these figures. The Council's Local Development Framework is expected to look ahead to 2026. It is recommended that the pitch provision figures are increased to cover this whole period using a compound annual growth rate of 3% for gypsies and travellers and 1.5% for travelling showpeople (applied to baseline provision plus additional requirement). Hence the total additional provision for New Forest District (including the National Park) for the period 2006-2026 will amount to 26.5 pitches for gypsies and travellers, and 17 pitches for travelling showpeople. The methodology used results in New Forest District receiving a relatively high ongoing requirement because it already has substantial existing provision.
- 3.2 In addition to residential pitch provision there is a requirement for transit sites. Transit sites are temporary stopping places for people travelling within or through an area perhaps to attend seasonal or family events. The current proposals do not provide allocations for transit provision for individual districts. However, figures are provided for county groupings with the figures for Hampshire and the Isle of Wight amounting to 41 pitches and 77 caravans. It is proposed that county-based joint working establishes the level and form of provision required within those areas. The Regional Planning Board is commissioning a regional study into transit movement patterns and higher level evidence of needs.

4. OFFICER COMMENT ON THE RECOMMENDATION FOR PROVISION

4.1 The Council commissioned jointly with other Hampshire authorities a Gypsy and Traveller Accommodation Assessment, which was published in June 2007, and a Travelling Showpeople Accommodation Assessment, published in March 2008. These assessments examined the needs for accommodation arising in the area, as well as potential in-migration to Hampshire from neighbouring areas of Wiltshire and West Sussex. These reports formed the basis for the Council's response to the previous consultation in 2008, in which provision in line with these assessments was supported.

4.2 The justification for the pitch distribution now proposed is set out in the supporting text to Policy H7 which states at para.4.2:

'The level of proposed provision is derived from survey-based needs assessments carried out by local authorities in consultation with GTTS [Gypsies, Travellers and Travelling Showpeople] communities, and advice from local authorities on how the assessments should be interpreted for their areas. 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 limited.'

4.3 It is clear that although the proposed distribution of sites has been informed by needs assessments, a policy decision has been taken to redistribute identified needs away from some parts of the region to be accommodated in other areas. This results in a relatively high requirement in New Forest District (including the National Park). Consistent with Members' previous consultation response, it is recommended that the Council should object to the proposed revised distribution.

4.4 The distribution which is proposed was chosen over a more redistributive option as a compromise, in part to ameliorate the severe implications of that option for pitch provision in Hampshire (see 2.6 above). However, looking at the implications for new pitch provision in New Forest District, the proposed approach results in a requirement for 2006-2016 which is double that suggested by the Council's own needs assessments (requirements of 9 pitches for gypsies and travellers and 11 pitches for travelling showpeople under the proposals, compared with 5 pitches each under the Council's needs assessments). This level of increase was previously rejected as an option, it being seen as undeliverable in Hampshire when considered on a county basis. It should also be noted that New Forest District already has the largest share of existing provision for both gypsies and travellers, and travelling showpeople of any district in Hampshire. An approach which requires twice the amount of provision than is suggested by the evidence, as is now proposed, is clearly at odds with the strategy of the South East Plan, which recognises the need for development restraint in the New Forest.

4.5 Furthermore, the calculation of the requirement for the period beyond 2016, based on compound annual growth of existing and proposed pitch provision, results in a significantly higher overall pitch requirement for the District up to 2026. Sites to accommodate this higher provision up to 2026 will need to be identified in the Local Development Framework. However, the scale of new provision raises serious questions regarding the delivery of this number of pitches within New Forest District.

4.6 The methodology used for the redistribution of pitches across the Region is explained in paragraph 5.11 of the Policy H7 recommendations. 25% of the pitch provision across the South East was 'pooled' and then redistributed across the region. This approach is effectively transferring needs from one part of the region to be met by new provision in other areas. It is stated that the redistribution is then made on the basis of two equally weighted criteria:

- The share of the regional total of land without restrictive environmental and landscape designations; and
- The share of population at 2016 as an indicator of relative employment opportunities and access to public services (tending to be more available in populous areas).

4.7 It is considered that the regional-scale application of this methodology does not take account of the particular circumstances which apply within New Forest. If this methodology had taken account of the very high level of national and international designations in the District, as well as the dispersed pattern of small settlements, then it would be unlikely to justify such a relatively high pitch requirement for the following reasons:

(a) A large proportion of the district (77%) lies within the National Park or Area of Outstanding Natural Beauty and includes large areas of the most sensitive nature conservation designations. Substantial areas are also at risk of flooding. Taking into account the statutory requirement to protect the setting of the National Park and AONB and other factors, there are significant constraints to finding sites for new development in the District.

(b) Using population as an indicator of accessibility to jobs and services is not a useful measure when applied to New Forest. The District has one of the largest populations of any non-unitary authority in the country. On this simplistic analysis the District is assumed to have good access to jobs and services and therefore should provide for a substantial number of pitches. However, the District's population is dispersed into small towns and villages which do not contain large employment centres. There is a high level of out-commuting to neighbouring conurbations, as might be expected of a largely rural District.

It appears that these factors have not been given proper consideration, which results in a misleading characterisation of the District and a false impression of its capacity to accommodate new pitches.

Conclusions

4.8 It is considered that the Council should make the following representations to the Planning Inspectorate regarding the pitch provision proposed in the recommendations for Policy H7 in the partial review of the South East Plan:

- The Council does not support the redistributive approach to the distribution of pitch provision. The evidence does not justify provision in one part of the region to meet needs arising in another part. In this instance, the transfer of needs arising in the far east of the region to the far west is unsustainable.
- The regional redistribution proposed results in a pitch requirement which is not supported by the Council's own needs assessments. The District already has the highest existing provision for gypsies and travellers and travelling showpeople in Hampshire. The proposed requirement for new pitches 2006-2016 equates to twice the level of need indicated by the Council's own evidence, and is too high. The same level of increase in pitches now proposed for New Forest District was rejected for Hampshire as a whole because it was seen as being undeliverable.
- The methodology used for the redistribution provides a misleading impression of the District's characteristics and its capacity to accommodate new pitch provision. Account

needs to be taken of the extent of national landscape designations, international nature conservation designations and other constraints on development, as well as the lack of major employment and service centres in the District. The high requirement for new sites is inconsistent with the strategy of the South East Plan which recognises the high level of constraints in New Forest District and provides for development restraint in the area.

- The clear difficulties in meeting the proposed 2006-2016 requirement within New Forest District are further compounded by the methodology for calculating requirements beyond 2016. The 3% and 1.5% compound annual growth rates for new provision beyond 2016 result in a requirement which is unlikely to be deliverable within the District. The Council has not previously been consulted on the extension of this method for calculating provision beyond 2016.
- The Council supports further work on provision for transit sites and will work with neighbouring Hampshire districts on this matter. Future provision should be based on evidence of needs and the capacity of areas to accommodate provision.

5. ENVIRONMENTAL IMPLICATIONS / CRIME AND DISORDER IMPLICATIONS / EQUALITIES AND DIVERSITY IMPLICATIONS

- 5.1 The Consultation document is accompanied by a Sustainability Report. This can be viewed on the website:
gos.gov.uk/497648/docs/171301/815607/824352/Sustainability_Appraisal_of1.pdf
- 5.2 Options for sites to accommodate the finally agreed provision of new pitches for gypsies and travellers will need to be identified through a Local Development Document under the Local Development Framework. This will be subject to sustainability appraisal and statutory consultation.
- 5.3 It should be acknowledged that the identification of additional pitches and sites to accommodate needs should reduce the incidents of unauthorised encampments.
- 5.4 The partial review of the South East Plan on this matter is designed to make provision for a recognised minority group. This is not challenged. The issues highlighted in this report focus on the special circumstances of New Forest District rather than on the principle of meeting regional needs for accommodation for gypsies, travellers and travelling showpeople.

6. FINANCIAL IMPLICATIONS

- 6.1 None directly as a result of this report, but it should be acknowledged that gypsy and traveller provision on authorised sites should serve to reduce unauthorised encampments which would provide financial benefits through reductions in enforcements and removals where these arise on Council land.

7. PORTFOLIO HOLDERS' COMMENTS

- 7.1 Planning and Transportation Portfolio Holder supports the recommended objection, on the grounds that our own "needs" based assessment together with our necessary requirement of respecting environmental constraints is a more soundly-based policy than the one asked of us which is based solely on a regional redistribution.

Comments to follow from:

- Employment, Health and Wellbeing Portfolio Holder.

8. RECOMMENDATION

- 8.1 That Cabinet endorses paragraph 4.8 of this report as the Council's response to recommendations of the partial review of the South East Plan on provision for gypsies, travellers and travelling showpeople.

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Annexes to document not included, but available by following the link below.
gos.gov.uk/497648/docs/171301/815607/824352/Partial_Review_of_Policy_H7.pdf



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:
- Barbara Bay – Panel Secretary
The Planning Inspectorate
Room 4/02 Temple Quay House
2 The Square, Temple Quay
Bristol BS1 6PN
- Email: bbaysdnp@googlemail.com
Telephone: 0117 372 8424
Mobile: 079 1905 7365
Fax: 0117 372 8766
- 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

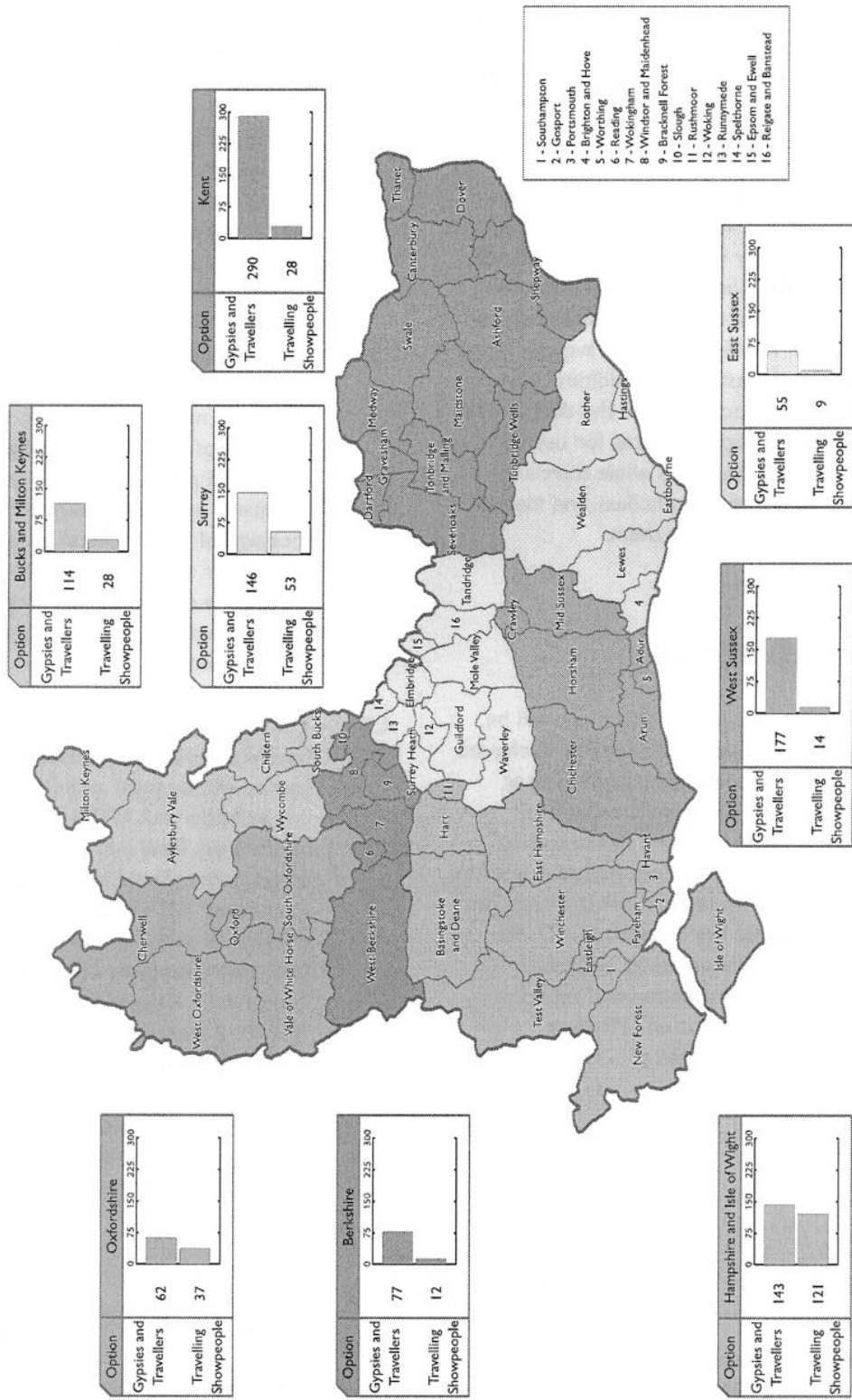
FOOTNOTES

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.

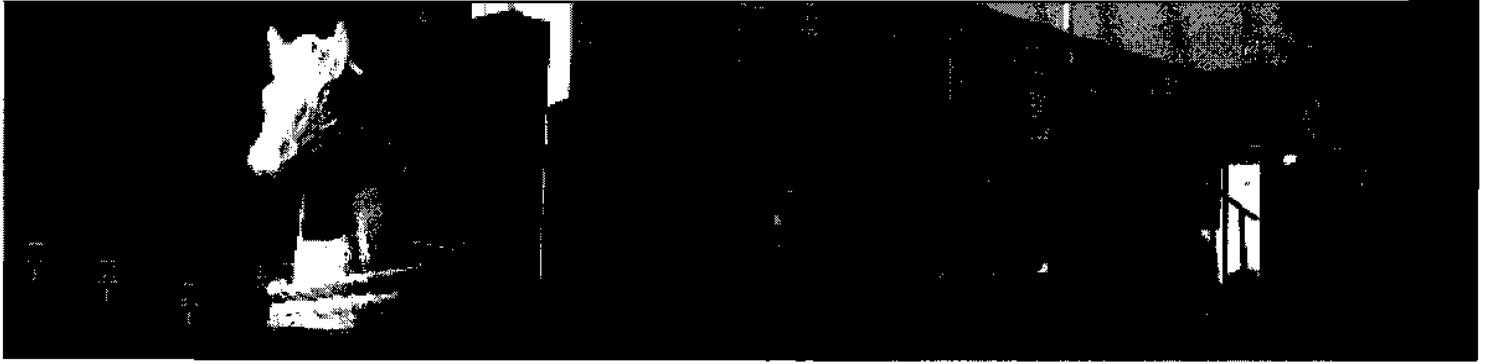
FOOTNOTES

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 GTAs. Other sources considered include CLG Caravan Count, and where available and provided, council enforcement records and police data.

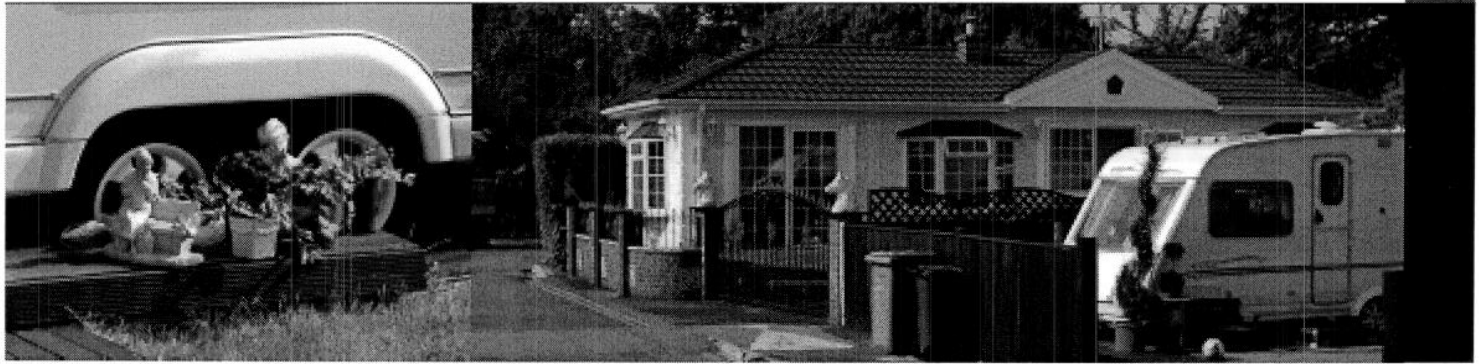


TABLE H7a

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 1

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 1

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 GTAAAs 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/TSAAs 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 PPS11 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.