



COUNCILS AND
COMMUNITIES
IN PARTNERSHIP

**SOUTH EAST PLAN PARTIAL REVIEW:
GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE
PRO-FORMA FOR ADVICE FROM LOCAL AUTHORITIES**

Advice submitted by: *(list authorities)*
Elmbridge Borough Council
Runnymede Borough Council
Spelthorne Borough Council
Woking Borough Council

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A. THE ADVICE PROCESS

A1. Has the Advice been agreed by elected members in all constituent authorities?

Yes
No

If No

A2. Which authorities have not agreed the Advice?

N/A

A3. How were key stakeholders (including the Gypsy and Traveller communities) involved in the GTAA and subsequent processes leading up to the submission of the advice?

Members of the local Gypsy and Traveller community were recruited to act as interviewers in the compilation of the GTAA and the snowball sampling technique utilised by the consultants employed to undertake the GTAA relied upon the cooperation of the Gypsy and Traveller community to ensure the high level of response.

A member of the Surrey Travellers Forum, a resident from a local Gypsy site and a representative of the Showman's Guild of Great Britain were included in the Steering Group which drafted the advice prior to the submission to SEERA.

Finally the advice has been the subject of a Stakeholder Engagement exercise, whereby the draft advice was circulated, including delivery in person, to key stakeholders in the Gypsy and Traveller and settled communities prior to the final consideration of advice and subsequent submission to SEERA. For full details of the engagement exercise see section 13 (pages 18 onwards) of the Advice Note.

B. NEED AND PITCH PROVISION REQUIREMENTS: GENERAL

B1. What is the overall requirement for **permanent** (residential) pitches **2006-2011** on which the advice is based?

Advice on B1
53 Pitches

Checklist	
If this is not the total estimated in the GTAA please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used
<p>The GTAA concluded a need for 49 pitches over a 5 year period from 2007 – 2012. However the data for the GTAA was gathered in March and June 2006 and supplemented with information from District Authorities in January 2007. Following the full count of caravans in April 2007, as requested by SEERA, it was noted that the GTAA no longer reflected an accurate description of the current population. Accordingly the new data was substituted resulting in an increase in the extra pitch need in this period. The same calculation methodology and assumptions were used in the recalculated figures as applied to the initial GTAA data. For details see section 3 (pages 3 – 6) of the Advice Note.</p>	

B2. What is the overall requirement for **permanent** (residential) pitches **2011-2016** on which the advice is based?

Advice on B2
34 Pitches

Checklist	
If this is not the total estimated in the GTAA please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used
In addition to the changes in base data discussed above an error in calculation within the GTAA was detected following completion of the survey. This figure has now been correctly calculated applying a 3% annual growth rate to the combined supply and needs figures. This is explained in paragraphs 3.6 and 3.7 of the Advice Note.	

- B3. If benchmarking suggested a significantly different level of need to that identified in the GTAA, please indicate what if any steps have been taken to reconcile the difference (e.g. by assessing the main possible sources of over or under-estimation indicated in the benchmarking report).

If the GTAA conclusions have changed as a consequence please specify how and whether the revised figures have been politically endorsed.

Advice on B3

Despite endorsing the reliability of the numbers produced as reasonable Benchmarking suggested, based on the average of the Jan 06 and Jan 07 Caravan Count, that a need of 69 pitches would occur. Significant doubt is raised over the accuracy of the Caravan Count and the additional count undertake in April 2007 is considered to be more robust and accurate. As this additional data increases the estimated pitch requirement from 49, laid out in the original GTAA, to 53, this is considered to appropriately reconcile the differences to the RSS formula calculation of 69. The estimated pitch requirement has been politically endorsed.

The local population is relatively small (due to small geographic area of the GTAA) and settled and it is considered that the regionally applied formula is less robust than the local calculation in the GTAA (as amended).

C. DISTRIBUTION OF PITCHES

Option A: Please outline a distribution of the number of pitches required for each local planning authority within your advice partnership which seeks to meet identified needs where they arise as identified through the GTAA and existence of unauthorised encampments.

Advice on C (Option A):
Should SEERA feel that the need identified should be met where it arises the proposed distribution for the period 2007-2012 is:
Elmbridge BC – 11 Pitches Runnymede BC – 21 Pitches Spelthorne BC – 8 Pitches Woking BC – 13 Pitches

Checklist	
If this is not the distribution identified in the GTAA please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used
<p>Ideally the Option A distribution should also be based on where Gypsies and Travellers have said they wish to live. However the distribution of need across the four districts of North Surrey cannot be based on identified demands from the GTAA as those surveyed had 'no specific geographic preference'. The distribution has therefore been calculated using the existing proportion of the Gypsy and Traveller population residing in each district. For details see section 4 (page 6) of the Advice Note.</p> <p>Option A has been included as requested but it is considered to be a technical exercise as it does not take into account the wider context and the need to ensure a sustainable outcome, which balances the needs of all communities, within general planning principles.</p> <p>It should also be noted that the above distribution is for a higher level of need (53 pitches) than the GTAA (49 pitches). The reasons for a higher pitch provision have been given in section BI above and within section 3 pages 2-6 of the Advice Note.</p>	

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D. DISTRIBUTION OF PITCHES

Option B: Please outline a distribution of the number of pitches required for each local planning authority within your advice partnership which seeks to take account of planning, environmental and other identified factors.

Advice on D (Option B):
Taking account of environmental and other factors the proposed distribution for the period 2007-2012 is: Elmbridge BC – 15 Pitches Runnymede BC – 14 Pitches Spelthorne BC – 11 Pitches Woking BC – 13 Pitches

Checklist
Please provide explanatory details:
The data sources used to reach the pitch requirement
Methods of calculation
Any assumptions used
The data source used to reach the pitch requirement is that within the GTAA as adjusted to take account of the additional data requested by SEERA in April 2007 (see section 3 pages 2-6 of advice note).
The distribution has been based on a comparative scoring system of identified constraining factors between the District Authorities. This method is crude and cannot take account of all constraints and comparators, such as predicted population change, local characteristics of existing sites etc. However in order to make the most informed assessment this simplistic methodology, shared with other GTAA groups in Surrey is considered the best solution. Further discussion and a matrix of comparisons is included in the accompanying full advice document (section 5.9 pages 9 – 10).

Supplementary question

D1. Were any of the following criteria taken into account? If so, please outline how was this done?

Protecting and enhancing the natural environment	
	<p>A comparison has been made of the Natural Environmental Constraints in the four District Authorities. Included in these constraints was the amount of SSSI, Green Belt, Special Protection Area, Flood Plain, Sites of Nature Conservation Importance, Waste and Mineral Safeguarding, Common Land, Local Nature Reserves and Noise related public safety zones for airports. See section 5 pages 6 – 10 of Advice Note.</p> <p>These comparators seek only to contrast the four North Surrey Authorities for the purposes of the calculation of an appropriate distribution.</p>
General availability of land for development (site allocations, NLUD PDL, register of public sector land, Council land for disposal etc...)	
	<p>The amount of Previously Developed Land was considered as part of the strategic assessment, again as a comparator between the District Authorities.</p>
Making best use of existing or planned infrastructure provision	
	<p>The availability and access to existing and planned infrastructure was considered, and as a proxy to any empirical figure the amount of housing land proposed in the submitted draft SE Plan was used.</p>
Facilitating access to employment opportunities	
	<p>Specific access to employment opportunities were not considered. Due to the small geographical area of the North Surrey GTAA group access is unlikely to be demonstrably affected by the distribution between the four Districts.</p>
Facilitating access to local services	
	<p>Specific access to local services were not considered. Due to the small geographical area of the North Surrey GTAA group access to service specifically targeted at the Gypsy and Traveller Community is unlikely to be demonstrably affected by the distribution between the four Districts. Access to more general local services is reflected in the proxy calculation of existing and planned infrastructure provision.</p>
Meeting Gypsy and Traveller wishes/aspirations	
	<p>Again due to the small geographical area and settled population in North Surrey the geographical aspirations of the community have not been specifically considered. However the existing distribution of sites has</p>

	been taken into account to allow the continuation of established communities and family groups.
Widening locational choice for Gypsies and Travellers	
	Due to the higher than average past provision in North Surrey, and Surrey as a whole, it is not considered that the distribution within this small area has any impact on locational choice for Gypsies and Travellers.
Being fair	
	Equity between the Districts has not been specifically considered, however it may be noted that the application of environmental and other constraints has resulted in a more equitable distribution, with those districts with historically lower provision taking a greater proportion of need.
Achieving political buy-in	
	No adjustment have been made to achieve political buy-in, rather all distributions have been considered in the light of legitimate constraints and the needs of the Gypsy and Traveller Community.
Extent of land protected from development	
	As discussed above the restrictions on development associated with environmental constraints have been considered within this distribution.
Other criteria considered (<i>please specify</i>)	

E. ANY OTHER DISTRIBUTION OF PITCHES

Please outline any other distribution of the number of pitches required for each local planning authority within your advice partnership.

Advice on E
<p>The Advice Note that has been prepared proposes an Option C. This option involves meeting the identified demand for additional pitches by making provision outside the GTAA area. The reasons why this option has been proposed are detailed within the Advice Note (section 6 pages 10 – 14) but in summary it is felt that this approach is required in order to take into account the following issues:</p> <ul style="list-style-type: none"> - The North Surrey GTAA was one of the smallest (if not the smallest) GTAA areas in the South East; - There is currently a very high existing provision in North Surrey, which if increased could lead to problems with sustainability; - The application of Option B in North Surrey has not led to a truly strategic approach to provision as the assessment is constrained by the size of the area covered; - Because of the limited size of the GTAA area neither Option A nor B offer solutions that provide a wide choice of location for gypsies and travellers. - The sustainability factors of increased provision including economic, environmental and social dimensions as well as access to services.

Checklist	
Please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used
<p>Table 5 (page 12) within the Advice Note sets Surrey's current provision in the context of that of other counties. It demonstrates that Surrey has the second highest authorised provision in the South East. However if you consider these figures in the light of the geographic area of these counties, then Surrey has the highest current provision.</p> <p>Furthermore Appendix C of the Advice Note demonstrates that North Surrey has the highest current concentration of authorised sites of 10 pitches or more.</p> <p>The DCLG guidance states that "Councils that have already made site provision are entitled to expect that, in this shared responsibility, every authority – and particularly those that neighbour high concentrations of Gypsies and Travellers – should make a contribution to future site provision."</p> <p>It should also be noted that two of the three Surrey GTAAs have shown that many Gypsies and Travellers currently resident and seeking accommodation in</p>	

Surrey expressed no 'specific geographical preference' for new accommodation.

The engagement process has also endorsed Option C as a preferred option amongst stakeholders (see section 13 page 18 onwards of Advice Note).

F. TRANSIT NEEDS

- FI. Please provide a qualitative assessment of the demand for and type of transit provision

Advice on FI

A large privately managed Transit site is currently provided in the area (in Spelthorne).

The GTAA concluded that the presence of some temporary unauthorised development on existing private sites indicated that the Transit site requirement is likely to be low and would be in the form of temporary stopping places within existing private caravan sites.

Furthermore discussions with the Gypsy and Traveller community within the Steering Group meetings have revealed that the overriding need is for permanent provision and that such provision should be large enough to facilitate transit provision for relatives.

SEERA are therefore asked to note that, due to the low occurrence of unauthorised encampments in the area, the current provision, and the views of Travellers and Gypsies, there is little demand for further specific Transit sites in North Surrey. It is anticipated that any further Transit need can be best accommodated through a review of existing sites to ensure effective use of land.

Checklist

Please provide details of the evidence used for the assessment

Information obtained from the GTAA and from stakeholders within the Steering Group.

F2. How may this assessment be impacted by an increase in the provision of permanent caravan pitches?

Advice on F2

As indicated in F1 it was felt that transit provision should not take precedence over permanent provision.
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Checklist

Please provide details of the evidence used for the assessment
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The above view was expressed by Gypsy and Traveller representatives at a Steering Group meeting held on the 26 June 2007.

G. TRAVELLING SHOWPEOPLE

G1. Has pitch need for Travelling Showpeople been assessed within your GTAA?

Yes Yes
No

If No

If an assessment is underway but not yet complete, please indicate the area of coverage and the date you expect to be able to provide the Assembly with a copy of the final report.

Area of coverage	
Report date	

If your Advice area has decided **not** to carry out an assessment of pitch need for Travelling Showpeople, please indicate why.

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G2. What is the total Advice area requirement for Travelling Showpeople pitches **2006-2011** on which the advice is based?

Advice on G2

There is evidence of need for additional pitches but despite several attempts to establish the pitch numbers required it has not been possible to do so.

Insufficient data was obtained from surveys undertaken for the GTAA to establish a robust assessment of Travelling Showpeople's requirements. Although primary data was not available, there had been a Countywide study undertaken in 2004 by WPS Planning. This study had also been endorsed by the Showmen's Guild and was felt, at the time of the GTAA, to be a reliable source of information on travelling show people's needs.

The WPS Planning Study concludes that there is a need for an additional 66 pitches throughout Surrey. From this the GTAA has estimated that, assuming the findings of the study are correct, and assuming an Option A approach (meeting need where it arises), there would be a requirement for 37% of the total of 66 units to be met within North Surrey. This leads to a pitch requirement of 24. The GTAA has added to this a 2.5% annual natural growth rate from the completion of that study in 2004, leading to a total estimated pitch need, on an Option A approach, for North Surrey of 29 pitches.

However it should be noted that the Local Authorities have subsequently found a number of discrepancies with the figures provided in the WS Planning Study on current supply. It is not therefore felt that the Study can be taken as a robust assessment of Travelling Showpeople's needs.

More recently the Showman's Guild has undertaken an internal assessment of their own members to assess current shortfalls and the likely future need until 2012. Their own study suggests a total need in North Surrey of between 24 and 32 pitches (for the period to 2012), however of this number the Guild feel that only 12 should be provided in the North Surrey districts with the remainder welcoming an option to relocate to other areas.

The Guild were asked to provide information to substantiate their data but have not been able to do so in the time available.

In the absence of any robust data it is felt that further assessment of show people's needs at a Regional level is required.

Furthermore SEERA are asked that when considering the allocation of pitches for show people in North Surrey to consider the possibility of meeting a proportion of the need elsewhere in the County or the Region. This approach will promote greater equity and choice for show people and assist in enhancing the social inclusion of this minority group.

Checklist	
If this is not covered by your GTAA, or this is not the total estimated in the GTAA, please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used

G3. What is the total Advice area requirement for Travelling Showpeople pitches **2011-2016** on which the advice is based?

Advice on G3
<p>As indicated in G2 above it has not been possible to obtain robust data on levels of need. However the GTAA does indicate that beyond 2012 the population, and therefore need for further pitches, is anticipated to rise by 2.5% year on year allowing for a prediction of need to 2016.</p>

Checklist	
If this is not covered by your GTAA, or this is not the total estimated in the GTAA, please provide explanatory details:	
	The data sources used to reach the pitch requirement
	Methods of calculation
	Any assumptions used

- G4. Please outline a distribution of the number of pitches required for each local planning authority within your advice partnership which seeks to meet identified needs where they arise as identified through the Travelling Showpeople GTAA and existence of unauthorised encampments.

Advice on G4	
<p>The four Local Authorities are awaiting confirmation from the guild of the figures used to determine the needs given above and are unable to determine a distribution for each Borough until these are forthcoming.</p>	

Checklist	
If this is not taken directly from the GTAA please provide explanatory details:	
	Nature of evidence used
	Methods of calculation of any quantitative assessment

H. IMPLEMENTATION AND DELIVERY

Checklist

For each element please include details of the evidence drawn on in your Advice

The cost and type of facilities required on caravan sites

<p>Any new site will require the appropriate residential infrastructure in the same way as any other kind of accommodation. As a minimum it is likely that water, electricity and gas supplies will be needed by all sites and a connection to a public sewer or septic tank as appropriate. Such facilities are likely to be provided, in part, through the provision of amenity buildings which must be of an appropriate scale to reflect the occupational needs of residents. As evidenced in the North Surrey GTAA fire prevention facilities are of particular importance to site occupiers and should be included in all sites.</p>
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<p>Larger new sites may also require communal facilities and play space. However this is dependent on the size and location of new provision. The specific requirements for families will vary between sites dependent largely on occupation, as smaller family sites may prefer more communal facilities and larger or public sites are likely to require individual amenity provision.</p>
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<p>The price of land within North Surrey is extremely high. This will be reflected in the cost of any new sites and will mean that significant levels of Government grant and subsidy will be required.</p>

<p>Provision on new private housing development (Section 106 sites) is proposed by the CLG as a method of securing new supply but it would be necessary for the Government to guarantee funding for such sites at the outset. This is because, unlike affordable housing provision, a cascade to allow for the absence of grant would not be appropriate or possible for this type of provision.</p>
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<p>The provision of sites within the urban area will mean that they are competing for land that will already be allocated for residential purposes and they will need to satisfy planning guidance that they are in sustainable locations. This will add significantly to the cost of providing such sites.</p>

<p>Sites not in the urban area, and therefore by default in the Green Belt locations, will need to satisfy the “very special circumstances test”. The difficulty of providing either an urban or Green Belt location cannot be underestimated.</p>
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<p>In addition to the consideration of new facilities necessary on new sites</p>
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	<p>Stakeholder Engagement has confirmed a need to ensure that facilities on existing sites are properly maintained and upgraded. Any provision of new pitches will need to be carried out in conjunction with a proper review of existing sites and facilities.</p>
<p>Estimated implementation costs for proposed level of provision and potential sources of funding</p>	
	<p>Implementation costs will vary according to site location, type and size. It is therefore difficult at this time to estimate costs for the proposed level of provision.</p> <p>The GTAA has also indicated that some Travellers and Gypsies would prefer to live on private sites and therefore an element of future provision may come from this source.</p>
<p>Responsibilities for delivery and management of pitches (by type), including the role of social landlords</p>	
	<p>Each of the Local Authority Districts currently contains a large public site with good management records and full occupancy. There are also a variety of other types of provision from small private sites, of one or two pitches, to large public sites or 16 or more pitches. Each district has had successes and difficulties with each form of provision.</p> <p>If a small number of sites are allocated to each district it is possible that the expansion of existing sites may be considered, or new small individual or family sites in private ownership may be appropriate. The stated accommodation preference from the North Surrey GTAA is for 'small, self-owned long-stay sites for family groups' and this would appear to be appropriate in light of likely allocation numbers. Should this be the case there would be no specific role for RSL's or other housing delivery agencies.</p> <p>The GTAA was able to provide information on housed gypsies and travellers and of the 77 households interviewed for north and east Surrey only 5% (4 households) indicated a wish to leave settled housing and have a pitch on a site. In contrast of the 78 households interviewed for the north Surrey study alone over 24 (32%) indicated that they wanted their own house, bungalow or a council home. There is therefore evidence to show that those who have moved into housing are settled and that some of the identified need can be met through the provision of mainstream housing. The Districts will therefore consider how they can work with social landlords to ensure that Gypsies and Travellers are obtaining equal access to mainstream housing, perhaps through increasing awareness of allocation systems and Choice Based Lettings procedures.</p> <p>The DCLG guidance highlights that a rigid approach to provision is not</p>

	<p>appropriate. The Steering Group supports this and feels that should pitches be allocated within North Surrey then consideration should be given to the accommodation preferences of future users before determining actual site provision.</p> <p>SEERA are advised that the specific delivery and management of sites will be dependent on their location and scale and will be determined following final site allocation. It is also proposed that an assumption should be made that a small element of the pitch need can be met through mainstream housing.</p>
<p>Anticipated timing of preparation of relevant LDD documents setting out site allocations for Gypsy and Traveller caravan pitches</p>	
	<p>No timetable is yet available for site allocation LDDs, however as soon as site allocations have been determined proposals for delivery of sites will be included within each of the Districts DPDs.</p> <p>While no Strategic Locational criteria have yet been established it is anticipated that the effective use of existing sites will need to be considered as part of the delivery of additional pitches. Such assessment can be carried out in conjunction with a review of existing facilities as discussed in paragraph 9.6 of the Advice Note.</p> <p>SEERA are advised that Strategic Locational criteria will also depend on the number of pitches allocated and although not currently available will be developed as soon as allocations are confirmed. Joint District documents may be necessary.</p>
<p>Strategic site location criteria which the RSS should include to inform the preparation of the relevant LDDs</p>	
	<p>As above</p>
<p>Anticipated split between public and private provision of pitches</p>	
	<p>The method of delivering sites is dependent on site allocation; whereas appropriately sized and located private pitches may meet the allocated site provision in some Districts in North Surrey success with large public site management in others may recommend different site delivery mechanisms.</p> <p>Due to the high land costs in many parts of North Surrey public delivery may be necessary. This, however, would again be dependent on site allocation.</p> <p>SEERA are advised that the split of public and private provision will be explored once the scale of site provision has been determined.</p>
<p>The implications of the diversity of the Gypsy and Traveller</p>	

population in an area for the appropriate size and number of caravan sites

Surrey as a County, and parts of North Surrey more specifically, house a significant proportion of the Gypsy and Traveller population for the South East of England. Further site provision near to existing Gypsy and Traveller population centres may lead to difficulties within the community itself and for its inclusion with the wider settled community. However, while the great majority of Gypsies and Travellers, (88%), have been identified as English Gypsies, the minority groups of Irish Traveller and other ethnicity must be considered. It would not be appropriate; however, to attempt to create separate sites for those of different ethnicity as such action would be difficult to practically manage and would be open to challenges of racial prejudice. The preference for small 'family' pitches would accommodate concerns of such diversity without leading to legal or administrative problems.

SEERA are advised that it is felt that no material implications are likely to arise from the diversity of the Gypsy and Traveller population in North Surrey that need to be included in the consideration of the size and number of caravan sites.

I. ANY OTHER ADVICE

Please provide details of other relevant advice

In addition to considering new provision Stakeholder Engagement in the GTAA and Steering Group meetings has confirmed a need to ensure that facilities on existing sites are properly maintained and upgraded.

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Please return the completed pro-formas with any other accompanying / supporting documentation to the Assembly by **15 October 2007**.

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