

**ADVICE TO SEERA ON THE PROVISION OF ACCOMMODATION
FOR GYPSIES AND TRAVELLERS
IN NORTH SURREY**

FINAL DRAFT

1. BACKGROUND & INTRODUCTION

- 1.1 At the end of 2004 significant changes occurred in the relationship between Local Authorities and Gypsy/Traveller communities. The Criminal Justice and Public Order Act of 1994 removed the longstanding requirement for Local Authorities to provide sites within their areas. Subsequently many parts of the country failed to provide an adequate number of sites to meet the growing needs of the Gypsy and Traveller community. This led to a new approach in 2004 to assessing Gypsy and Traveller requirements.
- 1.2 The Housing Act 2004 imposed a statutory requirement on Local Authorities to produce a Gypsy and Traveller Accommodation Strategy and to undertake a Needs Assessment (GTAA).
- 1.3 Under the new approach to planning for Gypsy and Traveller site provision, Regional Spatial Strategies are also to identify total pitch requirements at the regional level and allocate these between local Planning Authorities (LPAs).
- 1.4 In November 2006 the Housing (Assessment of Accommodation Needs) (Meaning of Gypsies & Travellers) Regulations amended the definition of a Gypsy and Traveller. This had the affect of adding Travelling Show People to the group for which needs had to be assessed. However this was some time after many needs assessments had been commissioned and a full assessment for this group has not been possible in many GTAA areas.
- 1.5 The South East England Regional Assembly (SEERA) informed Local Authorities in December 2006 that they would require them to provide advice on the required provision for permanent and transit caravan sites for Gypsies/Travellers and Travelling Show People, in order to meet the estimated current need (including backlog), future provision and the associated means of delivery.
- 1.6 The exact number of pitches per Local Authority will be determined by the Regional Spatial Strategy review process and SEERA have instructed each Local Authority to provide advice on the Gypsy and Traveller site provision within its area by the 15 October 2007.
- 1.7 The advice to SEERA must be based on “a robust and reliable evidence base to underpin policy development” in this case, a GTAA.
- 1.8 The 4 boroughs in North West Surrey (Elmbridge, Runnymede, Spelthorne and Woking) came together in 2006 to commission Anglia Ruskin University to undertake the GTAA for North Surrey. This work has been concluded and some of the findings from the survey are set out below. A full copy of the survey is also available from each of the Local Authorities or on the website at www.runnymede.gov.uk.
- 1.9 SEERA have acknowledged that the GTAA is a technical exercise and that this needs to be supported by advice and information from the Local Authorities. The purpose of this advice note is therefore to set the findings of the GTAA within the context of other factors that are prevalent within the North Surrey area.

CONTENT OF THIS ADVICE NOTE

1.10 This advice to SEERA consists of:

- Confirmation of a single proposed level of gypsy and traveller pitch requirement within North Surrey.
- A distribution of this pitch requirement which seeks to meet identified needs where they arise (Option A).
- A strategic distribution of pitch requirements across the 4 Local Authority areas (Option B).
- A distribution of pitch requirements that acknowledges the current high level of provision within the area and develops the DCLG guidance concept of shared responsibility (Option C).
- Confirmation of advice on the provision of pitches for Travelling Show People within North Surrey
- Confirmation of advice on the provision of transit pitches in North Surrey.
- Advice on additional implementation and delivery issues.
- Feedback on stakeholder involvement and the engagement process.

2. STAKEHOLDER INVOLVEMENT & ENGAGEMENT

2.1 In accordance with SEERA guidance a Steering Group has been formed to assist with the preparation of this advice. The Group has consisted of a member from each constituent local/principal authority, representatives from key stakeholder groups and managers from Gypsy/Traveller sites. Details of the Steering Group membership are set out in Appendix A.

2.2 It is important that other stakeholders were given the opportunity to comment on future levels of provision. An engagement process was therefore undertaken between ? and ? and involved contacting appropriate delivery agencies, service providers and other stakeholders. The feedback obtained from this process is set out in section 13.

3. LEVEL OF GYPSY AND TRAVELLER PITCH REQUIREMENT IN NORTH SURREY

3.1 The North Surrey GTAA has calculated the existing and future need for Gypsy and Traveller accommodation in the North Surrey area. The methodology used for Gypsies and Travellers is based on Government advice. Because of the late addition of Travelling Show People it was not possible to use the GTAA methodology for this group. However the information provided on the needs of this group is set out in section 7.

3.2 It is estimated that there are approximately 650 individual Gypsies and Travellers living in caravans in North Surrey. The GTAA also demonstrates that North Surrey has a good record of site provision within the area.

3.3 Even in the most stable of communities the population could be expected to rise through family growth, families arriving from elsewhere and new family formation.

- 3.4 The North Surrey GTAA has identified a shortage in provision for Gypsies and Travellers and potential population growth. Table 1 is taken from the GTAA and sets out a need for 49 pitches from 2007 to 2016.

Table 1: GTAA future accommodation need 2007-2016 in North Surrey
(pitches rounded, excluding Travelling Showmen)
DCLG variable number in brackets

	Total
<u>Part A Current residential supply</u>	
Current supply of occupied local authority residential site pitches (1)	72
Current supply of occupied authorised privately owned site pitches (2)	54
Total Households	126
Number of unused local authority pitches, and vacancies on privately owned sites available in North Surrey (3)	3
Number of existing pitches expected to become vacant in near future (LA and privately owned) (4)	0
Number of households in site accommodation expressing a desire to live in housing (5)	0
New local authority pitches planned in year 1 (6)	0
Private sites likely to gain planning permission during year 1 (7)	0
<u>Total pitch provision available (2006)</u>	129
- seeking permanent site accommodation in the area (8)	0
- on unauthorised encampments (9)	0
- on unauthorised developments for which planning permission is not expected (10)	18
- currently overcrowded (11)	13
- new households expecting to arrive from elsewhere (12)	0
New family formations expected to arise from within existing households (13)	0
In housing but with a need for site accommodation (14)	0
<u>Current shortfall</u>	31
family formation 2007 – 2012 (15(i))	18
Extra pitch need 2007 – 2012	49
family formation 2012-2016 (15(ii))	64

- 3.5 It is important to note that the data for the GTAA was gathered in March and July 2006 and supplemented with information from the District Authorities in January 2007. However SEERA requested, and received, a full count of caravans in North Surrey in

April 2007. This was slightly different to that provided in January and it has been agreed by the Steering Group that the April 2007 data should be used to assess the level of need.

- 3.6 An error in the calculation of the 2012 – 2016 within the GTAA was also detected following completion of the survey. This figure should be calculated by applying a 3% annual growth to the supply and needs figure and result in a need for 34 pitches, and not 64 as shown in Table 1.
- 3.7 Adjustments have therefore been made to the original GTAA table of accommodation need to reflect the slightly higher provision in April 2007 and the amendment to the 2012 – 2016 figures. The table is now as follows:

Table 2: GTAA TABLE ADJUSTED FOR APRIL SUPPLY DATA
(pitches rounded, excluding Travelling Showmen) DCLG variable number in brackets

	Total
Part A Current residential supply	
Current supply of occupied local authority residential site pitches (1)	64
Current supply of occupied authorised privately owned site pitches (2)	55
Total Households	119
Number of unused local authority pitches, and vacancies on privately owned sites available in North Surrey (3)	8
Number of existing pitches expected to become vacant in near future (LA and privately owned) (4)	0
Number of households in site accommodation expressing a desire to live in housing (5)	0
New local authority pitches planned in year 1 (6)	0
Private sites likely to gain planning permission during year 1 (7)	0
Total pitch provision available (2006)	127
- seeking permanent site accommodation in the area (8)	0
- on unauthorised encampments (9)	0
- on unauthorised developments for which planning permission is not expected (10)	21
- currently overcrowded (11)	13
- new households expecting to arrive from elsewhere (12)	0
New family formations expected to arise from within existing households (13)	0
In housing but with a need for site accommodation (14)	0
Current shortfall	34
family formation 2007 – 2012 (15(i))	19
Extra pitch need 2007 – 2012	53
family formation 2012 – 2016 (15(ii))	34

3.8 **A total of 53 pitches are required during the period 2007 – 2012 and a further 34 pitches between 2012 and 2016. This is the level of need that SEERA are asked to assume for the North Surrey area.**

4. DISTRIBUTION OF PITCH REQUIREMENTS TO MEET NEEDS WHERE THEY ARISE – OPTION A

4.1 The provision of pitches to meet needs where they arise means the allocation of pitch numbers directly proportional to the need generated in each district. This will inevitably mean that those districts with an existing large population, or an existing large number of unauthorised developments and encampments, will produce the greatest need.

4.2 This ‘option’ 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.

4.3 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 and is set out in the table below:

District	Total Number of Current Occupied Authorised Pitches	Number of Current Pitches as a Percentage of Total Current Supply	Requirement as Calculated using the adjusted GTAA Total (as proportion of current provision)	2012 – 2016 Requirement as Adjusted
Elmbridge BC	24	20%	11	7
Runnymede BC	48	40%	21	14
Spelthorne BC	19	16%	8	5
Woking BC	28	24%	13	8
Total	119	100%	53	34

4.4 **SEERA are advised that, if distribution is to be made on the basis that need is met where it arises, then the above District distribution has been established.**

5. STRATEGIC DISTRIBUTION OF PITCH PROVISION - OPTION B

5.1 This alternative distribution of pitches takes into account ‘planning principles’ to reflect existing opportunities and constraints. Five basic principles have been identified by SEERA to assist in the consideration of ‘Option B’.

5.2 These five principles:

- Sustainability
- Equity and Choice
- Social Inclusion
- Environmental Protection, and
- Flexibility of provision.

5.3 Sustainability

5.3.1 Sustainability has economic, environmental and social dimensions and seeks to ensure that pitches are provided in appropriate locations to meet the needs and expectations of Gypsies and Travellers rather than the political expediency and convenience of the settled community. A similar process must be considered in the distribution and location of any land use to ensure that it is sited in such a way to make best advantage of its contribution to individual districts, while minimising any adverse effects on the surrounding areas.

5.4 Equity & Choice

5.4.1 Equity and Choice must be considered to tackle concerns that the majority of pitch requirement will be generated in those districts with the largest current site provision. The Government (CLG) and SEERA have confirmed that Councils that have already made site provision are entitled to expect that, in the shared responsibility across the region, every authority – and particularly those that neighbour high concentrations of Gypsies and Travellers – should make a contribution to future site provision. Notwithstanding this SEERA has instructed that this 'Option B' must make full provision from the need generated within the GTAA area.

5.5 Social Inclusion

5.5.1 Social Inclusion should be fostered in any new pitch allocation to ensure that new or enlarged Gypsy and Traveller communities can be integrated with the general, settled community. Within this consideration access to employment, especially in light of the small number of traditional occupations pursued by many members of the community should be considered.

5.5.2 There are many good reasons for future pitches to be near to existing Gypsy communities such as extended family links, provision of care to family members, and desire to maintain positive communities sharing cultural values and lifestyles, however the existing high level of provision in North Surrey may justify a wider dispersal of pitches to aid their integration in the small rural communities favoured by Gypsies and Travellers and provide greater access to employment and services.

5.6 Environmental Protection

5.6.1 Environmental Protection must be considered in any proposals for additional residential units. There must be appropriate land available within a district for it to provide future sites. There are many constraints on residential development in North Surrey including Flood Plain and proximity to the Thames Basin Heath Special Protection Area. These are set out in more detail below.

5.7 Flexibility

5.7.1 The Gypsy and Traveller population within North Surrey is reasonably stable however a very rigid approach to provision would not necessarily meet needs. A pragmatic

approach to provision, including the extension of existing sites to allow for site expansion, should therefore be considered.

5.8. CONSTRAINTS

- 5.8.1 A current shortfall and future need has been identified within North Surrey. Consequently this need must be addressed but plans for provision will need to take into account the various constraints.
- 5.8.2 Circular 01/2006 makes clear that Gypsy and Traveller sites are normally considered inappropriate development in the Green Belt. The recent guidance issued by the CLG also recognises that this is a serious constraint for Authorities with high needs but it also says that it should not be seen as an absolute block. It is considered that in North Surrey this is a serious constraint and SEERA are asked to consider the following:
- a. The draft policies in the South East Plan recognise that this is one of the most pressurised and constrained sub-areas in the region.
 - b. The Surrey Structure Plan 2004 also recognises that North Surrey is the most pressurised part of the county and the Green Belt has become fragmented. Protection of the Green Belt has been a high priority for the Government and Local Authorities for many years. Whilst Woking is contained within the North West Surrey sub-area and has growth potential in the town centre linked to its key public transport hub, the policy framework recognises the pressure on its surrounding countryside area.
 - c. Given such pressure for development within urban areas, both for housing and economic activity, there are considerable difficulties in allocating additional gypsy and traveller provision in urban areas. Furthermore any allocation outside urban areas, which in the four Boroughs means within the Green Belt, could only be allocated on the basis of very special circumstances that outweigh the harm caused to the openness of the Green Belt by inappropriate development.
 - d. The area is also severely constrained by large areas lying within the flood plain (where the Environment Agency has particular concerns about the vulnerability of residents of mobile homes), the absolute constraints (imposed by virtue of the European Habitats Directive) on development that has an adverse impact on the integrity of designated Natura 2000 sites which restrain large areas of the study area.
 - e. There are also constraints posed by the M25 and M3 motorways running through the area. These have noise impacts (to which mobile home and caravan dwellers are particularly susceptible) and also air quality, where in Runnymede and Spelthorne, Air Quality Management Areas have been declared near to the M25.
- 5.8.3 It is felt that the above constraints severely limit the ability of Local Authorities within North Surrey to make provision within the area. However SEERA has asked for an Option B distribution based on the GTAA area and therefore this has been produced below.

5.9 OPTION B DISTRICT DISTRIBUTION

5.9.1 A diverse number of sustainable constraints and opportunities must be considered in detail under 'Option B' and used to justify an alternative distribution within North Surrey. The following have been considered for each North Surrey District:

Natural Environmental constraints

- Such as AONB, SSSI, Flood Plain, MOD land and Local and International Nature Reserves).

Amount of Previously Developed Land (Proxy: Current Population)

- The higher the figure, the greater the potential capacity to absorb additional pitches *within* the urban areas on Previously Developed Land. This meets the access to services and sustainability criteria.

Existing or Planned Infrastructure. (Proxy: Amount of housing land proposed in the submitted SE Plan)

- Sites for Gypsy and Traveller pitches may be found, and assimilated, when provision is being made for additional development in the district. Therefore, the greater the level of additional housing to be provided the more scope there is potentially to accommodate pitches for Gypsies and Travellers.

Existing distribution of sites (Existing pitch provision by district)

- This factor takes into account the desire to meet needs where they arise as far as possible.

5.9.2 In order that these key constraints could be evaluated each factor was assessed and provided with a comparative 'score' out of three – 1 being the lowest and 3 the highest. These 'scores' are not directly proportional and instead attempt to quantify the realistic local restrictions on preference and delivery of site. For simplicity no weighting between factors was applied. Using this method the proportion of additional pitch provision was established and the additional pitches allocated to each district. The method is undeniably broad brush, but it does highlight the impact of the range of factors identified by SEERA as being relevant to the "Option B" distribution.

5.9.3 Further details as to those factors considered within the 'Natural Environment Constraints can be seen in Appendix B. Details of these constraints have been provided by each District authority. While each authority is constrained by differing environmental factors, those factors have been summarised in Appendix B in order that a simple comparison between the districts can be made.

5.9.4 It is acknowledged that this method of comparison is crude and can not take account of all constraints and comparators, such as predicted population changes, 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 to be the best solution.

Table 4 – Option B Distribution				
Factor	Elmbridge	Runnymede	Spelthorne	Woking
1.Natural environmental Constraints	1	2	2	1
2.Amount of PDL	2 (122K)	0 (78k)	1 (90k)	1 (90k)
3. Infrastructure	2 (231 dwellings pa)	1 (146 dwellings pa)	1 (151 dwellings pa)	2 (242 dwellings pa)
4. Existing Distribution of Sites	2 (20% of provision)	3 (40% of provision)	1 (16% of provision)	2 (24% of provision)
Total 'Score'	7	6	5	6
% of additional pitch provision	29%	25%	21%	25%
Additional pitch provision				
2007-2012	15	14	11	13
2012-2016	10	9	7	8

5.9.5 **SEERA are advised that if provision of pitches is to be made on the basis that all need is met within the GTAA area then the above District distribution is proposed.**

6. DISTRIBUTION OF PITCH REQUIREMENTS ACROSS A BROADER GEOGRAPHIC AREA – OPTION C

- 6.1 The North Surrey Steering Group has compiled this Advice in accordance with the SEERA brief, providing two 'Options' to distribute new Gypsy and Traveller pitches.
- 6.2 While 'Option B', as requested by SEERA, allows for some variation for this distribution, to take account of the environmental, social and other aspects of site provision, no opportunity is provided within Option B to suggest provision outside of the GTAA area.
- 6.3 It should be noted that the four Districts within North Surrey came together to undertake the GTAA as a result of administrative expediency, rather than strategic planning. Ideally the GTAA should have been undertaken on a Surreywide basis, however this was not possible. The result is that North Surrey is within one of the smallest GTAA areas in the South East. It is therefore felt reasonable, and appropriate, to consider provision that goes beyond the North Surrey GTAA area.
- 6.4 The DCLG publication entitled: 'Preparing Regional Spatial Strategies reviews on Gypsies and Travellers by regional planning bodies', is the most recent advice as it was published in March 2007. It sets the context for the production of Option C and this option is presented as the option that most closely reflects current government advice.

6.5 GOVERNMENT GUIDANCE

6.5.1 The DCLG document brings together information from research on the preparation and assessment of GTAAs. It suggests that the tool kit approach (set out in the document) can be used by Regional Planning Bodies (RPB) in their task of estimating regional pitch requirements and generating options for allocating this requirement between the Local Planning Authorities (LPA's).

6.5.2 The tool kit sets out a fairly detailed six step process which includes;

Step 1: Assembling GTAA information and stock-taking

Step 2: Benchmarking GTAA information

Step 3: Filling gaps and assessing regional pitch requirements

Step 4: Stock-taking information at LPA level

Step 5: Filling gaps at LPA level

Step 6: Considering principles which influence a 'strategic view of needs'

6.5.3 The key task in Step 4 is to examine the basis on which any allocation of pitch requirements between LPAs are made in joint GTAAs. The earlier review for the East of England showed that these methods are not always fully explained. The DCLG comments are as follows:

- Some GTAAs explicitly say that the breakdown of pitch requirements between LPAs is made solely on the basis of **where the need arises**. Such an approach inevitably tends to reinforce current provision patterns since the distribution of the Gypsy and Traveller population – often patchy across a county or sub-region – determines where future need arises.
- Some GTAAs attempt to make adjustments to the pattern of need where it arises by, for example, boosting requirements in some LPAs on the basis of locational preferences expressed in the survey. GTAAs not reviewed may make other adjustments which move towards a clearer assessment of assessing requirements where they should be met.

6.5.4 The guidance says in Step 4 that;

'This distinction is significant since it is arguable that GTAAs which take the second approach have already started to take a more strategic view of the location of pitch requirements. Moreover, where authorities have accepted and adopted the pitch distribution, there is some local commitment to the distribution proposed. We believe that RPBs should, when taking a strategic view of regional needs, give more weight to pitch allocations between LPAs in GTAAs which take into account factors other than solely the pattern of need as it arises.'

6.6 CURRENT PROVISION

6.6.1 The following information on the current concentration and distribution of sites in the South East and Surrey is felt to support the consideration of further options.

6.6.2 Table 5 demonstrates that Surrey has the highest concentration of Gypsy and Traveller accommodation, per hectare, in the south east. Kent has the highest provision of pitches, at 588, but these are within a geographic area that is twice that of Surrey.

Table 5 TOTAL AUTHORISED AND UNAUTHORISED CARAVANS IN SOUTH EAST

Local Authority	Geographical Area (as% of the whole)	Total Caravans on Authorised Sites (Public and Private)	%	Total Caravans on Unauthorised Sites	%
Buckinghamshire	8%	180	8%	113	14%
Milton Keynes	2%	18	1%	30	4%
Oxfordshire	14%	318	15%	26	3%
West Berkshire	4%	21	1%	2	<1%
Reading	<1%	0	0	7	<1%
Wokingham	<1%	78	4%	11	1%
Windsor & Maidenhead	1%	50	2%	4	<1%
Bracknell Forest	<1%	15	1%	1	<1%
Slough	<1%	0	0	3	<1%
Hampshire	19%	113	5%	136	17%
Isle of Wight	2%	0	0	2	<1%
Southampton	<1%	15	1%	0	0
Portsmouth	<1%	0	0%	20	3%
Surrey	9%	549	25%	94	12%
East Sussex	9%	41	2%	32	4%
West Sussex	10%	153	7%	38	5%
Brighton and Hove	<1%	38	2%	48	6%
Kent	18%	588	27%	210	27%
Medway Town	1%	14	1%	9	1%
Total for South East	1,910,401ha	2191		786	

Source: Caravan Counts Survey (ODPM, July 2005) NOTE: Data rounded up or down and does not add up to 100%

6.6.3 Surrey supports 25% of all authorised sites in the South East Region, despite being only one of nineteen principal authority areas. Many of the other areas in the region report **no** authorised sites or only extremely low provision, often less than 5% of Surreys own provision. This is considered to be indicative of a failure to make adequate provision for Gypsies and Travellers since 1994.

6.6.4 It is felt that an Option A or B approach to future provision will exacerbate this trend, creating a concentration of Gypsies and Travellers, over burdening access to specialist services and employment opportunities and failing to achieve national standards for inclusive, cohesive and sustainable communities.

- 6.6.5 The map (appendix B) shows the distribution of sites with over 10 pitches within Surrey. It demonstrates that there is a high concentration of larger sites in the north of the County.
- 6.6.6 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.”
- 6.6.7 It should also be noted that two of the three Surrey GTAs have shown that many Gypsies and Travellers currently resident and seeking accommodation in Surrey expressed no ‘specific geographical preference’ for new accommodation.

6.7. OTHER STRATEGIC CONSIDERATIONS IN SUPPORT OF OPTION C

- 6.7.1 There are a number of other factors set out within the Government guidance, which support an approach where an element of the identified need is met from outside the North Surrey GTAA area:

Provision and Sustainability

- 6.7.2 It is important that sites are provided in locations that are acceptable to the Gypsy and Traveller community. However there are severe limits on land supply within North Surrey. These are set out in paragraph 5.8 and support Option C.
- 6.7.3 The high cost of land within the urban area within North Surrey currently frustrates and inhibits the provision of affordable housing. It is likely that similar difficulties will be encountered with the provision of Gypsy and Traveller sites. Gypsies and Travellers wishing to purchase land for private sites, or RSLs wishing to purchase for public provision, will be unable to compete with private developers for land. It will also be necessary to provide significant levels of public subsidy to make provision successful in this area.

Equity & Choice

- 6.7.4 There is currently a full range of both public (72 pitches)¹ and private provision (57 pitches) across North Surrey. There is also transit provision. The various sites also cater for different gypsy and traveller groups and have a range of site sizes from just 1 pitch to those with 16 pitches.
- 6.7.5 The DCLG guidance states that gypsy and travellers looking for authorised site accommodation currently have severely constrained choices. They state that:
- “whilst some form of social housing is available in every local authority, there is no social rented site in 138 of the 353 local authorities in England, and only in 71 authorities is there more than one site.”
- 6.7.6 This is not the case in North Surrey.
- 6.7.7 It is felt that neither Option A or B helps to extend the choice of location and that provision within adjacent boroughs that lack sites should be progressed in order to increase choice.

¹ North Surrey GTAA appendix 1

Social Inclusion

- 6.7.8 As indicated in Option A there are many good reasons for additional provision to be made close to existing Gypsy and Traveller communities. However in such a small GTAA area additional provision is likely to have a significant impact on the ability of gypsies and travellers to find work and to access services.

Environmental Protection

- 6.7.9 There are a number of environmental issues that currently inhibit the provision of general housing within the North Surrey area. These include areas of extensive flood plain or special protection areas. The DCLG guidance states that “there is a presumption against the development of gypsy and traveller site, and other forms of development, in areas with positive environmental protection status and in areas of flood risk.”

Flexibility

- 6.7.10 The DCLG guidance states that there is a strong argument for flexibility in provision. This should allow for provision to be made across the South East rather than within small GTAA areas.
- 6.7.11 **SEERA are asked to consider an Option C which provides for a proportion of the need generated in North Surrey to be provided elsewhere within the County or the Region. This will promote greater equity and choice amongst the Gypsy and Traveller community and assist in enhancing the social inclusion of this minority group.**

7. CONFIRMATION OF ADVICE ON THE PROVISION OF PITCHES FOR TRAVELLING SHOW PEOPLE

- 7.1 In November 2006 the Government issued a Statutory Instrument (3190) that amended the definition of Gypsy and Traveller to include members of an organised group of Travelling Show People or Circus People (whether or not travelling together as such). The affect of this change was to include travelling showpeople within the remit of the GTAA.
- 7.2 The North West Surrey GTAA did attempt to estimate the needs of travelling show people but as only one Showman was interviewed it was felt that the data obtained was not sufficiently robust.
- 7.3 Although primary data was not available to establish Show People’s needs there had been a Countywide study undertaken in 2004 by WPS Planning. This had been initially endorsed by the Showmen’s Guild and was felt to be a reliable source of information on travelling show people’s needs.
- 7.4 It is known that, because of the late inclusion of show people within the GTAA many Local Authorities have not been able to undertake a full GTAA assessment of Show People’s needs. SEERA have acknowledged this and concede that there was insufficient time for Local Authorities to undertake credible and robust assessments. They have however asked that any information that is available is included within this advice.

- 7.5 The North Surrey GTAA refers to the requirement within the WPS Planning Study for an additional 66 pitches throughout Surrey. It 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.
- 7.6 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 that a total need to North Surrey between 24 and 32 pitches exist in the period to 2012, however of this number only 12 should be provided in the North Surrey districts with the remainder willing to relocate to other areas, promoting equity, choice and sustainability. 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.
- 7.7 There has been insufficient time to undertake an independent, full and robust study of Show People's needs or an assessment of provision for Show People for each Borough. The WPS Planning Study was undertaken prior to publication of Government guidance and did not capture all of the provision at the time. Although it provides some evidence of need it does not assist in giving a robust pitch requirement. While the recent Showman's Guild study provides a detailed assessment, there is a need to independently verify these results.
- 7.8 It is understood that SEERA are proposing to work with the Showman's Guild of Great Britain to establish a regional understanding of Show People's accommodation needs and to determine the final provision to be made within each of the Local Authority areas. This further assessment is encouraged by both the North Surrey Authorities and the Showman's Guild.
- 7.9 There are currently between 58 and 66 pitches for Show People in North Surrey. This high level of provision is unusual within the region and lack of provision in other areas prevents this group having any real choice about location. It is felt that an option C approach, whereby a proportion of need is met within other areas, would also be appropriate for this group. This approach is supported by the Showman's Guild.
- 7.10 SEERA are advised that current information suggests that there may be a need for between 24 and 29 pitches originating in North Surrey. However these figures require further investigation and independent verification and cannot be relied upon until a further regional assessment has been carried out.**
- 7.11 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 will promote greater equity and choice for Show People and assist in enhancing the social inclusion of this minority group.**
8. ADVICE ON THE PROVISION OF TRANSIT PITCHES IN NORTH SURREY
- 8.1 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 in the form of temporary stopping places within existing private caravan sites.
- 8.2 Furthermore discussions with the Gypsy and Traveller community within the Steering Group meetings have revealed that the overriding need is for permanent provision

- 8.3 **SEERA are 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.**

9. ADVICE ON ADDITIONAL IMPLEMENTATION AND DELIVERY ISSUES

Cost & Type of Facilities Required

- 9.1 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.
- 9.2 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.
- 9.3 As indicated above the cost of land within North Surrey is extremely high and this will be reflected in the cost of any new sites and will require significant levels of Government grant and subsidy.
- 9.4 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.
- 9.5 The provision of sites within the urban area will mean that they are competing for land that will already be allocated for residential purposes as they will need to satisfy planning guidance that they are in sustainable locations. This will add significantly to the cost of providing such sites. 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.
- 9.6 In addition to the consideration of new facilities necessary on new sites 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.

Estimated Implementation Costs & Sources of Funding

- 9.7 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.
- 9.8 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.

Responsibilities for Delivery & Management of Pitches (By Type) – Including the Role of Social Landlords

- 9.9 Each of the Districts contains a large public site with good management records and full occupancy. Due to the small number of sites that may be 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 considered 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.
- 9.10 Within North Surrey the existing site accommodation is delivered in variety of methods 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. Where large public sites have been shown to work well and existing management apparatus is in place it may be appropriate to consider future delivery in this model. In such circumstances RSL's may be approached to assist in delivery and/or management.
- 9.11 The GTAA was able to provide information on housed gypsies and travelers 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 ensure that Gypsies and Travellers are obtaining equal access to mainstream housing, perhaps through increasing awareness of allocation systems and Choice Based Lettings procedures.
- 9.12 The DCLG guidance highlights that a rigid approach to provision is not 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. It may be that any new sites would be best provided as either smaller privately owned sites, of approximately 4 pitches, to reflect the current preference and complement of the existing public provision, or larger public sites, of 12 – 16 pitches, where existing good management practice and appropriate locations can be utilised.
- 9.13 **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.**
10. TIMING OF RELEVANT LDD DOCUMENTS & STRATEGIC LOCATIONAL CRITERIA
- 10.1 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.
- 10.2 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 13.6 above.
- 10.3 **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.

11. SPLIT BETWEEN PUBLIC & PRIVATE PROVISION ON PITCHES

- 11.1 As discussed above the methods of delivery of 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.
- 11.2 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.
- 11.3 **SEERA are advised that the split of public and private provision will be explored once the scale of site provision has been determined.**

12. IMPLICATIONS ON THE DIVERSITY OF THE GYPSY & TRAVELLER POPULATION

- 12.1 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. As discussed above 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.
- 12.2 **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.**

13. FEEDBACK FROM STAKEHOLDER ENGAGEMENT

To be developed once feedback obtained_