

Q1: Do you agree that the current definitions of “gypsies and travellers” and “travelling showpeople” should be retained in the new policy?

Yes.

Q2: Do you support the proposal to remove the specific reference to Gypsy and Traveller Accommodation Needs Assessment in the new policy and instead refer to a “robust evidence base”?

Yes. However there is a concern that if the intention is to align the determination of need with that of housing need, then surely it is essential that a similar methodology (i.e. Strategic Housing Market Assessment) is used when determining the needs of gypsies and travellers. The approach must also take care to ensure that neither group is disadvantaged because different data sets have been used to assess need.

Q3: Do you think that local planning authorities should plan for “local need in the context of historical demand”?

Yes, but this should not be the sole criteria used in determining need. As is the case for housing development, assessments should also take into account known or future planned changes in the local context where they are relevant.

Q4: Do you agree that where need has been identified local planning authorities should set targets for the provision of sites in their local planning policies?

Yes, but it should be clear that these targets must be addressed through specific site allocations and that proposals for encampments outside of these allocated sites should be refused.

Q5: Do you agree with the proposal to require local planning authorities to plan for a five-year supply of traveller pitches/plots?

No. Unlike for regular housing development, where it is clear that population growth and other factors will necessitate an on-going supply of new homes, there is no evidence to suggest that this will be the case for travelling communities. Future generations may not wish to continue the traditional nomadic way of life and therefore it might be better to make an initial allocation of land for travellers to meet the evidenced need but thereafter consider proposals for expansion on their merits or review the situation every five years with new up-to-date evidence.

Q6: Do you agree that the proposed wording of Policy E (in the draft policy) should be included to ensure consistency with Planning Policy Guidance 2.

Assuming the thrust of PPG2 is retained within any consolidated 'National Planning Policy Framework' it makes sense that proposals for traveller sites in the Green Belt should be treated in the same way as proposals for new housing in the Green Belt.

With that said however, there is a concern that because many traveller communities set up encampments around the outskirts of London for the best possible access to employment opportunities (sometimes in Green Belt locations), taking too strict an approach may result in increasing the demand for traveller sites further out into places like Essex.

Q7: Do you agree with the general principle of aligning planning policy on traveller sites more closely with that for other forms of housing?

Yes, in principle. However we still envisage this causing tension between traveller communities and the residents of our towns and villages because the policy would be to direct traveller sites toward existing centres of population (i.e. 'sustainable' locations) where there is greater access to existing facilities and infrastructure, including public transport.

In our experience, there are some communities who object most vociferously to traveller sites and who would actually prefer them to be given preferential treatment to be located in a remote rural area, as far away from residential areas as possible.

We are also concerned about the policy of maintaining a 5-year ongoing supply of traveller sites (see comments above).

Q8: Do you think the new emphasis on local planning authorities consulting with both settled and the traveller communities when formulation their plans and determining individual planning applications will reduce tensions between these communities?

No. Sadly, no matter how much public engagement is undertaken to discuss the individual merits of particular proposals, there is a strong element of the resident population that will resist, as a matter of principle, any suggestion that a traveller site will be located near them.

Increased public consultation often only increases tensions between the residents of an area and travellers. Ultimately local planning authorities will be accused of 'ignoring' the resident population if it chooses to support a traveller site in a particular location, notwithstanding the level of engagement and education that has taken place.

Q9: Do you agree with the proposals in the transitional arrangements policy (paragraph 26 of the draft policy) that asks local planning authorities to "consider favourably" planning applications for the grant of temporary permission if they cannot demonstrate an up-to-date five-year supply of deliverable traveller sites to ensure consistency with Planning Policy Statement 3: Housing?

See comments in response to Question 5 where we do not agree with having to maintain a 5-year supply of sites. Planning applications should be assessed in accordance with evidenced need so as to demonstrate an even handed and consistent approach to provision of Traveller sites as any other approach is likely to provide confirmation that travellers are treated more favourably by the planning system than other members of the community.

Q10: Under the transitional arrangements, do you think that six months is the right time local planning authorities should be given to put in place their five-year land supply before the consequences of not having done so come into force?

No. The six-month period is too short for most local authorities to put their development plans in place. Furthermore, this is not consistent with general housing policy for which there is no prospect of temporary permissions. The implementation of temporary permissions after a six month period would further reinforce the believe that travellers are treated more favourably by the planning process, which we believe would damage the positive work most local authorities are doing in this area.

Q11: Do you have any other comments on the transitional arrangements policy?

This authority reiterates its answer to question 10.

Q12: Are there any other ways in which the policy can be made clearer, shorter or more accessible?

The policy should contain a clear definition of the terms “local need” and “historical demand” so as to help local authorities to have a consistent basis from which to calculate future pitch targets. This could also address the confusion that appears to exist between these terms and the guidance for determining planning applications.

Q13: Do you think that the proposals in this draft statement will have a different impact, either positive or negative, on people because of age, disability, gender realignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation? If so, how in your view should we respond?

No.