

## **Matter 12: Gypsy and Traveller Provision**

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### **Evidence of Need for Traveller Accommodation**

- 1) It is noted that the provisions of Policy CS21 are informed by the West of England Gypsy and Traveller Accommodation Assessment, 2007, (GTAA). Although the GTAA is a comprehensive document, the information and projected requirements are five years old and accordingly are not wholly reliable considering the transient culture of gypsies and travellers the potential for change since 2007.
- 2) The Core Strategy itself questions the accuracy of some of the data within the GTAA in relation to the level of provision required up to 2011:

*“It is believed the high numbers of unauthorised encampments were due to particular and unique circumstances in the district at that time. As a result, the GTAA placed a disproportionate reliance on the historic high numbers in setting provision for the district up to 2011 and, as a consequence, this figure now looks increasingly outdated as a basis to establish provision against, particularly in relation to transit provision.”<sup>1</sup>*
- 3) It is therefore submitted that whilst Policy CS21 should acknowledge the requirement to identify accommodation to address needs for additional accommodation, it is premature for the Core Strategy to identify specific sites, particularly the proposed New Neighbourhoods, in the absence of a more up-to-date and detailed evidence base. An accurate outline of the level of accommodation need (including the spatial distribution of need within the District) and the specific requirements of this need is required to inform where new accommodation should be provided.
- 4) The identification of potential sites should also be informed by a comprehensive assessment of all deliverable (suitable and available) sites and not only the proposed New Neighbourhoods. Moreover, the lack of prescription on the number of pitches to be provided within the New Neighbourhoods has the potential to delay the delivery of the sites, thereby jeopardising the delivery of the Core Strategy and conflicting with the National Planning Policy Framework. Critically, the proposed neighbourhoods do not represent broad areas of growth but are instead strategic allocations with specific policies addressing each allocation.
- 5) Accordingly it is recommended that the allocation of sites for additional gypsy and traveller accommodation be deferred to the Council’s proposed Policies, Sites and Places DPD (or another suitable alternative) which will allow for the completion of additional research and a more thorough assessment of deliverable sites. It is inappropriate for the Core Strategy to be allocating an undefined number of pitches within strategic allocations (New Neighbourhoods) without having any regard to the suitability of those or the availability of other potential sites.

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<sup>1</sup> Core Strategy incorporating Post-Submission Changes, December 2011, Paragraph 10.64

### **Compliance with the Planning Framework**

- 6) The Council's identification of the New Neighbourhoods as areas for accommodating some of the District's gypsy and traveller accommodation need is a major concern as it could adversely affect the deliverability of development at these Strategic Allocations. These strategic allocations underpin the vision, objectives and growth aspirations of the Core Strategy and therefore their delivery must not be constrained pending the completion of further research to identify the exact level of accommodation need in South Gloucestershire and surrounding areas.
- 7) As discussed briefly above, the proposed delivery of an unspecified number of gypsy and traveller pitches as part of the proposed New Neighbourhoods jeopardises the delivery of the neighbourhoods owing to the requirement to undertake the following tasks first:
- i. Assess the current and projected level of need (as opposed to relying upon a study that is five years old);
  - ii. Determine where in the District the need arises through co-operation with stakeholders and neighbouring local authorities;
  - iii. Undertake a thorough assessment of deliverable sites across the District; and
  - iv. Allocate numbers of pitches to various sites.
- 8) The completion of the above research has the potential to delay the delivery of the strategic allocations. Similarly, the developers/landowners associated with the New Neighbourhoods are likely to request robust justification for providing for additional gypsy and traveller accommodation at the New Neighbourhoods. In this context, the potential delays in delivering strategic sites contradicts the NPPF provisions which emphasises:

*“... the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.<sup>2</sup>*

- 9) Meanwhile the Government has also published its new 'Planning Policy for Traveller Sites' (March 2012) which sits alongside the NPPF. Policy A of the aforementioned National Policy Document emphasises the importance of using evidence to plan positively for traveller accommodation and states that local planning authorities should:

*“... use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.”*

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<sup>2</sup> National Planning Policy Framework, March 2012, Paragraph 173

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- 10) Having regard to the above, it is submitted that the GTAA underpinning the proposed delivery of gypsy and traveller accommodation as part of the New Neighbourhoods is not sufficiently robust by virtue of the time lapse since it was prepared in 2007. Furthermore, it appears that no thorough site search has been undertaken to assess the availability/suitability (deliverability) of sites across the District.
  
- 11) It is recommended that references to the proposed New Neighbourhoods accommodating additional gypsy and traveller accommodation be removed to ensure Core Strategy Policy CS21 is compliant with the NPPF and the Government's Planning Policy for Traveller Sites. The policy should instead focus on providing criteria to guide the delivery of additional accommodation to meet identified need whilst deferring the allocation of specific sites to later planning policy documents.