

**MATTER 1: OVERALL REGIONAL PROVISION**

**1 Scope of Submission**

- 1.1 This submission by North Dorset District Council (NDDC) addresses three of the issues for discussion raised in relation to the overall regional provision for sites for gypsies and travellers.
- 1.2 These are:
- Matter 1A: part (i) – relating to the requirements of Circulars 01/2006 and 04/2004;
  - Matter 1B: parts (i), (ii) and (vi) – relating to the scope and consistency of the Gypsy and Traveller Accommodation Assessments (GTAAAs) undertaken in the South West; and
  - Matter 1C: part (iii) – relating to Table 4.3 and the provision of sites beyond 2011.

**2 Matter 1A: Part (i)**

***Circular 01/2006 and Timescales for Delivery***

- 2.1 Circular 01/2006 sets out the way in which additional sites for Gypsies and Travellers should be provided through the ‘plan-led system’ and this process is explained in revised paragraph 6.1.13 (i.e. the supporting text to revised draft Policy GT 1). Local Planning Authorities are required “*to establish criteria for the location of Gypsy and Traveller sites in their Core Strategies as a guide to the specific allocation of sites in the relevant Development Plan Document (DPD).*” Draft revised Policy GT 1 also indicates that Local Authorities should “*identify realistically deliverable sites in their DPDs to provide for about 1,600 additional pitches for Gypsies and Travellers in the region, over the period 2006-2011*”.
- 2.2 For most Local Authorities in the South West, it will be very difficult for them to put in place their Core Strategies and then a DPD which allocates specific sites for Gypsies and Travellers by 2011, especially since the final version of RSS itself will not be published before mid-2008 at the earliest. The recently published Government White Paper ‘Planning for a Sustainable Future’ estimates (in the diagram on page 127) that a DPD takes 36 months to adopt under the current system. Even under the proposed revisions to the system, it is envisaged that “*a complex plan or core strategy*” would take 28 months to deliver.
- 2.3 In Dorset it is intended that local authorities will undertake joint working to take forward these more detailed policies on site provision. The preferred approach is to set up a Joint Committee to produce a joint DPD and Officers are currently examining the practicalities of setting up these

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arrangements. The situation is summarised in paragraph 2.3 of the Council's Local Development Scheme (LDS), which states: "*The Dorset Planning Officers Panel (DPOP) has agreed that a Joint Committee will be set up to prepare a Gypsy and Travellers Site Allocations DPD for the whole of Dorset, including Bournemouth and Poole. The need for such sites in each District will be set out in the RSS and reflected in the policies of each Council's Core Strategy. Once the timetable for the production of this DPD has been jointly agreed, it will be included in a future revision of this LDS.*"

- 2.4 It is suggested that the draft revised policy should establish a more realistic timetable for the delivery of additional pitches for Gypsies and Travellers that reflects the process set out in Circular 01/2006. To do this it would be necessary to extend the date for the delivery of sites beyond 2011. It would probably be more reasonable for the RSS to seek to meet the current 'backlog' of need by 2016.
- 2.5 The current proposed timescale is setting up local authorities to fail. It is likely that failure to deliver against RSS pitch provision targets will increasingly be used by applicants as an argument in support of proposals for new sites. In short, failure to amend the proposed timescale for delivery in RSS Policy GT1 is likely to see the provision of sites determined through the development control process (including appeals), rather than through the 'plan-led' system.
- Circular 04/2007 - Planning for Travelling Show People***
- 2.6 Circular 04/07: Planning for Travelling Show People was published on 21<sup>st</sup> August 2007. It suggests that the need for sites for Travelling Show People should be assessed as part of GTAA's. It also implies that the number of 'plots' specifically for this group should be identified separately in RSS and also dealt with separately in subsequent DPDs.
- 2.7 Some GTAA's, such as the one for Dorset, were undertaken well before the publication of the new Circular. They may not have had regard to the needs of Travelling Show People, although the one for Dorset did. However, most (including the Dorset GTAA) will not have separately identified the need for Travelling Show People 'plots'.
- 2.8 In the light of this relatively new Circular it would be appropriate to separately identify the need for any Travelling Show People 'plots' in the revised draft policy in RSS. This would both help to satisfy the requirements of the Circular and provide local planning authorities with appropriate guidance to take forward the provision of such sites in subsequent DPDs.

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**3 Matter 1B: Parts (i), (ii) and (vi)**

- 3.1 The two main concerns regarding the GTAA's undertaken in the region are:
- A lack of clarity about the methodologies used in different areas; and
  - The fact that information has not been collected on a consistent basis.
- 3.2 In some areas, such as Dorset, a comprehensive GTAA has been carried out involving a great deal of local survey work, including consultation with local Gypsies and Travellers, both housed and travelling. GTAA's for other areas however, have not looked at all aspects of need. In areas where GTAA's have not been carried out Table 4.3, to which revised draft Policy GT 1 relates, indicates that 'technical estimates' of need have been made, but in a few areas (the Gloucester and Cheltenham HMA and parts of the West of England HMA), the information on the need for transit pitches is simply "*not available*".
- 3.3 Where GTAA's have not been forthcoming, county and unitary councils have provided 'technical estimates' of need, but different methodologies were used and the sources of the detailed data behind these 'estimates' were not always clear. This has given rise to concerns about the soundness of the methodologies and the robustness of the underlying data used to assess need in other parts of the region.
- 3.4 Research to support the preparation of RSS reviews on Gypsy and Traveller pitch provision has been prepared by the Centre for Urban and Regional Studies, University of Birmingham; Salford Housing and Urban Studies Unit, University of Salford; and the Centre for Regional Economic and Social Research, Sheffield Hallam University. This research sets out advice to regional planning bodies to systematically examine local GTAA's with a view to checking their robustness.
- 3.5 The South West Regional Assembly (SWRA) commissioned the Universities of Birmingham and Salford to assess the consistency of the GTAA's in the region and their advice (Benchmarking Review of Gypsy and Traveller Accommodation Assessments in the South West) was produced in January 2008.
- 3.6 The analysis of the Dorset GTAA suggests that the survey method is "*generally reliable*" and that all appropriate groups have been considered in the assessment, although there were major concerns over the approach to assessing need. The Benchmarking Summary (in Appendix 2 of the

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GTAA Review) notes that the Dorset GTAA gives a total demand for pitches in the period 2006 – 2011 of between 597 and 621: approximately 50% of which (c.300) would be residential pitches. However, when the RSS formula is applied to the January 2007 Caravan Count in the County, the overall need is assessed as being only 30 pitches (increased to 55 if 'tolerated' unauthorised sites on other land were to be treated like unauthorised developments). The massive discrepancy between the two need estimates highlights the importance of having a consistent methodology applied across all parts of the region.

- 3.7 A consistent approach to need will help all concerned to understand what real differences exist in different parts of the South West and this understanding is essential in order to ensure that adequate provision is made in all parts of the region.
- 3.8 The District Council endorses the GTAA Review advice and supports its main conclusions, in particular:
- Dorset and Wiltshire emerge as the GTAA's with approaches which seem likely to consistently overstate (Dorset) and understate requirements (Wiltshire);
  - Four of the GTAA's (Cornwall, Devon, Gloucestershire and West of England) are generally satisfactory and their findings can be accepted as robust. The remaining GTAA's (Dorset, Somerset and Wiltshire) are less robust. The District Council supports the suggestion of the study that the figures for these areas should be amended before final regional proposals are made;
  - The Dorset GTAA produced an unreasonably high estimate of need for residential pitches;
  - The Somerset GTAA omits allowance for need arising from family formation; and
  - The Wiltshire GTAA produces an estimate of need which seems unreasonably low.
- 3.9 The District Council would support an increase in the pitch requirements for Somerset and Wiltshire as recommended, but considers that the RSS formula-based estimates of need for Dorset (of 55 or 66 pitches in total, depending on the method of calculation – see pages 20 and 21 of the GTAA Review Report) are unrealistically low and would not fully address the issues affecting the Dorset sub-region.
- 3.10 In its submission to Matter 2, sub-matter E, The District Council has set out proposed consistency reductions in the pitch estimates for North Dorset taking account of both the conclusions of the Birmingham and Salford Universities study and local factors. In this respect the District

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Council fully supports Dorset County Council's proposed amendments to the figures.

**4 Matter 1C: Part (iii)**

- 4.1 Government policy (in paragraph 34 of PPS 3: Housing) is that *“Regional Spatial Strategies should set out the level of overall housing provision for the region ... for a sufficient period to enable Local Planning Authorities to plan for housing over a period of at least 15 years.”*
- 4.2 The pitch requirements in RSS are likely to be included in policies in Core Strategies (which generally look to 2026) produced by Local Planning Authorities and paragraph 2.14 of PPS12: Local Development Frameworks indicates that *“the time horizon of the core strategy should be for a period of at least 10 years from the date of adoption”*.
- 4.3 The revised draft policy in RSS only makes provision for the period up to 2011. It does not provide any guidance on the level of provision for the remaining 15 years of the Plan period after 2011 and therefore would not enable Local Planning Authorities to plan sufficiently far enough ahead to comply with Government policy.
- 4.4 It is suggested that the revised draft policy in RSS should indicate the likely level of need for pitches for the 15-year period post-2011, in order to enable local authorities to plan ahead until 2026.
- 4.5 Most GTAAs, such as the one for Dorset, look beyond 2011 and they tend to indicate that much of the overall need is to deal with the current 'under provision' of sites. Once this 'under provision' problem has been addressed, the studies suggest that future needs would be much more modest. Rather than seeking to deliver large numbers of pitches in the period up to 2011, with very few after that date, it is suggested that a more realistic 'site provision trajectory' should be developed, that takes account not only of current needs, but also reflects the time required to deliver appropriate sites through the 'plan-led' system.