

## Comments on Gypsy, Traveller and Travelling Showpeople's Accommodation Assessment (GTAA)

Site/Policy/Para	Issues Raised	Recommended Response
<p><b>Consultees commented on/raised the following issues with the GTAA:</b></p>	<p>The report is "flawed" due to a statement on page 9, para 6 which states: "there is little to no evidence of significant need for permanent accommodation arising from the unauthorised encampments within the two boroughs [Burnley and Pendle]". Based on this, there is no need for the sites.</p>	<p>This comment in the GTAA refers to 'unauthorised encampments' which are sites where Gypsies and Travellers move onto land which they do not have the owner's permission or any planning permission to stay on. The report clearly found a need arising from other accommodation sources e.g. bricks and mortar housing and what it described as 'unauthorised developments'.</p>
	<p>There is no proven need for gypsy sites in Burnley. The Salford University report clearly states that there is no need for a traveller site in Burnley.</p>	<p>This is not correct. The report clearly found a need. This comment is presumed to refer to a point on page 9 of the GTAA, which states that: "there is little to no evidence of significant need for permanent accommodation arising from the unauthorised encampments within the two boroughs [Burnley and Pendle]".</p> <p>This comment in the GTAA refers to 'unauthorised encampments' which are sites where Gypsies and Travellers move onto land which they do not have the owner's permission or any planning permission to stay on. The report clearly found a need arising from other accommodation sources e.g. bricks and mortar housing and what it described as 'unauthorised developments'.</p> <p>The Council is required by law to assess the accommodation needs of Gypsies and Travellers and by national planning policy to meet their needs through its Local Plan.</p>
	<p>There is no existing requirement. National government does not require it of Burnley Borough Council, and BCC have not proven the requirement.</p>	<p>This is not correct. The report clearly found a need. The Council is required by law to assess the accommodation needs of Gypsies and Travellers and by national planning policy to meet their needs through its Local Plan.</p>
	<p>The study was completed within two weeks, which is too short a time. Insufficient consultation was taken with residents already living in the area, or other gypsy and traveller families who visit Burnley regularly.</p>	<p>The report's authors acknowledge on page 13 the time restrictions for the interview stage of the study. It is not unusual however for only a percentage of the bricks and mortar population to be interviewed and estimates made of the 'hidden' population and the need figures adjusted accordingly. The researcher interviewed all known Gypsies and Travellers who were willing to take part.</p>
	<p>The GTAA is caveated by the authors with respect of limited time to complete, size of the sample, and assumptions made. It commented on the small size of the site the council is now proposing. The assumptions in the</p>	<p>The report's authors acknowledge on page 13 the time restrictions for the interview stage of the study. It is not unusual however for only a percentage of the bricks and mortar population to be interviewed and estimates made of the 'hidden' population and the</p>

<p>report mean that any decision made on the basis of these is questionable without further work. It also stresses the additional consultation and due diligence work that the council should complete, however this outcome does not appear to be in the public domain. The strategic plan should be finalised to reflect this and the question deferred to a later date.</p>	<p>need figures adjusted accordingly. The researcher interviewed all known Gypsies and Travellers who were willing to take part.</p> <p>The report has been determined by the planning inspector who Examined Pendle's Core Strategy as "a robust assessment of need".</p> <p>It is not accepted that insufficient time or information was given for consultation.</p>
<p>Spa Wood has been vacated since the report, meaning the study is now no longer relevant</p>	<p>In both 2012 and 2014 when researchers visited the site to interview residents, the site was occupied.</p>
<p>Spa Wood has been incorrectly labelled an "unauthorised gypsy and traveller site". This may be owned by a Gypsy and Traveller family, but has never been used by other Gypsy and Travellers.</p>	<p>This issue has been clarified. Burnley Borough Council has confirmed that this privately owned site is authorised for use as a residential caravan site for the four households residing there.</p>
<p>The document is not transparent – a 15 pitch site can potentially hold up to 3 caravans per pitch – 45 caravans and additional facilities for sanitation and drying.</p>	<p>It is not the role of the GTAA to assess the suitability of sites, but to assess need and demand. The suitability of individual sites and their capacity will be determined through the site selection process and sustainability appraisal and the comments of residents through consultation on any proposals.</p> <p>At the time of publication, the government's design guidance for Gypsy and Traveller sites recommended a pitch size of 500m<sup>2</sup>, recognising that a household may have more than one caravan. This guidance has since been revoked and no replacement been issued; however 500m<sup>2</sup> remains a reasonable guide as to pitch size.</p>
<p>The word "positive" appears consistently on this document – it may be positive in every aspect for travellers but not others in the area.</p>	<p>The report deals specifically with the needs of Gypsies and Travellers as the SHMA does for the non Gypsy and Traveller community. It does not make recommendations on the location of any site. The suitability of individual sites, as with any type of development where people may hold differing views on impacts, will be determined through the site selection process and sustainability appraisal and the comments of residents through consultation on any proposals.</p>
<p>Where in the report is the evidence of impact on the local community? The supporting evidence is flawed as it does not extend beyond principles to social, emotional and economic impact on neighbours. The proposals will have an impact on the residential area.</p>	
<p>The report is nothing more than a diversity survey. It merely confirms ethnicity, current accommodation and reasons for wanting a local base.</p>	<p>It is the role of the GTAA to assess need, as the SHMA does for the non Gypsy and Traveller community.</p>

The report includes a lot of data about those of gypsy heritage who reside in bricks and mortar accommodation; of what relevance is this data to the issue of a permanent site for travelling gypsies residing in caravans?	It is the role of the GTAA to assess need and demand, including that arising from Gypsies and Travellers currently living in bricks and mortar accommodation which they may be doing out of choice or because of a lack of available caravan sites.
The council has sat on this document for two years without notifying anyone.	It is normal practice to publish evidence base alongside the Plan/Plan stage for which they were prepared so people can see the evidence set out and how the Council proposes to respond. This was also the case with other evidence studies.
There is a lack of robust evidence in the report.	The report has been determined by the planning inspector who Examined Pendle's Core Strategy as "a robust assessment of need".
There are flaws with the GTAA which overestimates Burnley's need whilst underestimating Pendle's, is not robust enough, and uses out of date evidence. Its findings are contradicted by the caravan count. There is a failure to co-operate with Hyndburn, who have capacity on existing sites.	The Council is required by law to assess the accommodation needs of Gypsies and Travellers and by national planning policy to meet their needs through its Local Plan.
It is hard to understand the technical jargon used in all the paragraphs.	The Council acknowledges that technical reports such as the GTAA can be difficult to read and understand at times. Officers were available at a series of drop in events during the consultation period and are available at other times to help clarify matters.
The report gives policy makers the answer they want, which is why it has been selected.	This is not accepted. The report was an objective assessment carried out independently by the Salford Housing & Urban Studies Unit who have considerable experience in this field and who have carried out a number of reports of this nature.
The report is prepared by people who cannot know what is best for Burnley. Policies are being set by people who do not live in the area.	The report was an objective assessment of need and demand prepared by a research and consultancy unit that has considerable experience in the field. It is the role of the GTAA to assess need and demand, as the SHMA does for the non Gypsy and Traveller community. It is for the Local Plan to determine how to respond to the identified need.
Transient travellers were included in the study when calculating the need for sites.	This refers to two respondents identified on pg. 31. Whilst it was correct to establish the needs of these households, they were not included in the final calculation of need as they were visiting family and had a base elsewhere(pp. 48 - 50, GTAA).
Who instructed Salford University to carry out this report, and at what cost?	Salford Housing and Urban Studies Unit were commissioned by Pendle Borough Council on behalf of Burnley and Pendle Council's to carry out this report in May 2012. The report cost Burnley Borough Council £5,876.25

	<p>Why has time and money been spent on the GTAA when it only benefits gypsies and travellers, despite years of local government "belt tightening"?</p>	<p>In additional to the legal requirement to assess the accommodation needs of Gypsies and Travellers, national planning policy requires Council's to assess and meet their needs and demands through its Local Plan - as the SHMA does for the non Gypsy and Traveller community. The report cost Burnley Borough Council £5,876.25</p>
	<p>Salford University has been paid £85k to produce the report.</p>	<p>The report cost Burnley Borough Council £5,876.25</p>
	<p>The GTAA relies on the word of the respondents that four households have lived there more than ten years and that they did not have a base elsewhere (a response clearly serving their own interests). If this was the case, it is surprising it was not reflected in the biannual caravan count or known to local residents. It is not robust enough evidence to warrant placing four pitches at Spa Wood.</p>	<p>It is the role of the GTAA to assess need and demand, as the SHMA does for the non Gypsy and Traveller community, and it is perfectly legitimate and appropriate for interviewees to express their wishes as with any response to a survey. It is for the Local Plan to determine how to respond to the identified need. Burnley Borough Council has confirmed that this privately owned site is authorised for use as a residential caravan site for the four households residing there and it is not being taken forward as a preferred allocation in the Local Plan.</p>
	<p>It was noted in the study there was much more work to be done to determine if Spa Wood was a suitable site, possibly uncompleted due to time constraints.</p>	<p>It is not the role of the GTAA to assess the suitability of sites, but to assess need. The suitability of individual sites to meet the need identified will be determined through the site selection process and sustainability appraisal.</p>
	<p>The study makes no independent assessment of the suitability of Spa Wood, other than the opinion of respondents.</p>	<p>It is not the role of the GTAA to assess the suitability of sites, but to assess need and demand. The suitability of individual sites and their capacity will be determined through the site selection process and sustainability appraisal and the comments of residents through consultation on any proposals.</p> <p>The Council has confirmed that this privately owned site is authorised for use as a residential caravan site for the four households residing there and it is not being taken forward as a preferred allocation on the Local Plan.</p>
	<p>We see statistics derived from assumptions rather than clearly derived facts. We then see those numbers processed using further assumptions, meaning any hard, underlying data has become so diluted as to make suggested solutions unreliable.</p>	<p>It is not unusual, however, for only a percentage of the brick and mortar Gypsy and Traveller population to be interviewed in GTAAs and estimates made of the 'hidden' population and the need figures adjusted accordingly. The report states on page 13 that researchers thought they had only interviewed 61% of Burnley's estimated bricks and mortar Gypsy and Traveller population.</p> <p>The report has been determined by the planning inspector who Examined Pendle's Core Strategy as "a robust assessment of need".</p>

	<p>The council has failed to work collaboratively with other councils on the issues. The GTAA refers to Pendle, but no need or sites were identified in the borough. Additionally, Hyndburn, where there are 16 existing traveller sites, is ignored. Whilst it is acknowledged Burnley and Pendle share a housing market for strategic planning purposes, it does not follow that such a constraint should have been applied when looking at traveller sites.</p>	<p>It is appropriate that Burnley and Pendle who are considered to share a housing market area, jointly prepared a GTAA to ensure consistency across the evidence base for housing. Other cross-boundary impacts with other districts are considered through the plan-making process.</p>
	<p>The GTAA makes references to the previous planning regime of Circular 01/2006 and regional planning, both since replaced, or were in the process of being replaced by the NPPF and <i>Planning For Traveller Sites</i>. It is unclear if this was prepared with regard to the extinct or extant planning policy, but if the former it has severe implications for the evidence base.</p>	<p>The report was written in the context of the legislation, national policy and guidance that existed at the time. The Council has prepared a GTAA Addendum to align the 2012 Study with national policy and legislative changes.</p>
	<p>The sample size for Burnley was 61%, whereas Pendle is only 50%. Burnley can be commended for trying to plan positively.</p>	<p>Comment noted. The report states on page 13 that researchers thought they had only interviewed 61% of Burnley's estimated bricks and mortar Gypsy and Traveller population.</p>
	<p>Did the authors visit all the sites or just look on an Ordinance Survey map?</p>	<p>It is the role of the GTAA to assess need and demand, not the suitability of sites. Interviews were carried out by researchers in July 2012 through visiting sites where Gypsies and Travellers were known to be living.</p>