

**Luton and South Bedfordshire  
Joint Planning and Transportation Committee  
15 June 2007**

**Agenda Item No 7**

<b>AUTHORS</b>	Joint Officer Team: John Stanbridge (BCC); Peter Mulvihill (LBC); David Hale (SBDC)
<b>SUBJECT</b>	East of England Plan - Single Issue Review  “Planning for Gypsy and Traveller accommodation in the East of England: Issues and Options - Consultation Document May 2007”
<b>PURPOSE</b>	To agree a response to the Consultation.
<b>RECOMMENDATION</b>	That the Committee authorise a response to the Consultation based on the concerns outlined in Section 4 of the report and any other major concerns agreed at the meeting.
<b>REASON FOR RECOMMENDATION</b>	To ensure that the views of the Joint Committee are taken into account in the preparation of the East of England Plan Review.

## **1. BACKGROUND**

- 1.1 The Draft East of England Plan (EEP) was subject to Examination in Public between November 2005 and March 2006. The Panel Report was published and sent to Government at the end of June 2006.
- 1.2 The Government considered the Panel's recommendations and published its Proposed Changes to the EEP in December 2006. These were subject to 12 weeks public consultation, which ended on 12 March 2007. The Government are presently evaluating the responses and it is anticipated that the Final East of England Plan will be adopted and published in late summer/early autumn 2007.
- 1.3 The ODPM Circular 01/2006 was issued in February 2006 and made major changes to Government requirements for the provisions to be made for Gypsies and Travellers (G+T). The Circular was issued too late to be

properly considered at the Examination in Public and will not be fully reflected in the adopted East of England Plan. To get things back in line as quickly as possible, the East of England Regional Assembly (EERA) are carrying out a 'single issue' review of the emerging EEP to establish G+T needs across the Region.

## 2. REQUEST TO SECTION 4.4. AUTHORITIES FOR INFORMATION ON GYPSY AND TRAVELLER NEEDS IN THE COUNTY

- 2.1 On 20 July 2006 EERA formally requested Section 4.4 Authorities (includes BCC and LBC) across the Region to supply information on present G+T site occupancy and future needs across the County.
- 2.2 The Districts and Luton had already commissioned David Couttie Associates (DCA) to carry out the “**Bedfordshire & Luton Gypsy & Traveller Accommodation Needs Assessment 2006**”.
- 2.3 This assessment suggested that 74 additional permanent G+T pitches were required in the County/Luton between 2006–2011:

	Number	Range
Bedford Borough	10	Up to 10
Mid Beds	19	19 to 20
South Beds	34	34 to 40
Luton Borough	11	11 to 17
Total	<b>74</b>	<b>74-87</b>

In addition, it identified a need for 45 emergency stopping places per year (not all occupied at the same time) spread across the County.

- 2.4 Bedford Borough, Mid Beds and Luton were broadly happy with the results but South Beds had reservations about the methodology and the resulting numbers. The above figures formed the basis of a joint BCC/LBC response to EERA's request for information.
- 2.5 It should be noted that this study included G+T needs in Bedford and Mid Beds that are not part of the Southern Beds Growth Area.
- 2.6 It should also be noted that the study covered only the period 2006 – 2011. The emerging East of England Plan covers the period to 2021 with further consideration of the period to 2031.

## 3. EERA ISSUES AND OPTIONS CONSULTATION

- 3.1 To gain further information and to raise the profile of the single issue review, EERA hosted two seminars in Cambridge (26 October 2006 and 7 December 2006) which were attended by councillors and officers from across the Region. Members of the gypsy community and representatives from health, social services and educational organisations also attended.
- 3.2 The Department of Communities and Local Government, GO-East, and the Regional Assemblies for the East of England, South East England and the

South West jointly commissioned a study **“Preparing Regional Spatial Strategy Reviews on Gypsies and Travellers by regional planning bodies”** to establish a methodology for apportioning pitch provision/locations across the East of England Region. The report was published in March 2007. It can be viewed on the EERA web site at [www.eera.gov.uk](http://www.eera.gov.uk).

- 3.3 The study identified a need for around 1,220 additional residential G+T pitches in the East of England Region to 2011:

Bedfordshire / Luton	86
Cambridgeshire / Peterborough	383
Essex / Unitaries	438
Hertfordshire / Unitaries	114
Norfolk	94
Suffolk	100
Total	<b>1215</b>

- 3.4 The results from the report, combined with information supplied by the Section 4.4 Authorities were used as the basis for EERA’s public consultation document **“Planning for Gypsy and Traveller accommodation in the East of England: Issues and Options”**. The document is on public consultation from 8 May to 31 July 2007. It too can be viewed on the EERA web site at [www.eera.gov.uk](http://www.eera.gov.uk).
- 3.5 EERA suggest that Luton and South Bedfordshire should provide 52 additional pitches. 13 in Luton and 39 in South Beds. (Mid Bedfordshire would provide 22 and Bedford Borough 12 pitches). In Option 2, where EERA put forward an alternative minimum allocation of 15 pitches for each Authority, in order to enable a greater spread of provision, South Bedfordshire and Luton would provide 54 additional pitches, Luton rising to the minimum 15. (Bedford Borough would similarly rise to 15).
- 3.6 The Gypsy & Traveller Single Issue Review sits alongside the overall housing growth requirements. To put the matter into perspective, research that informed the DCLG/EERA study suggested that that a generous pitch size assumption of 200 sq. metres should be used to maximise flexibility and sustainability. On this basis, the 45 to 52 residential pitches required in the growth area would have a land take of around one hectare. This compares against the approximate 920 hectares required for the 42,000 additional built dwellings.
- 3.7 To publicise the public consultation EERA have written to a large number of public bodies and organisations including all Town and Parish Councils in the County.
- 3.8 EERA are also hosting a “public engagement” event in each County. Although the County and Luton asked for two such events, one in the South and one in the North, EERA was only able to agree to a single event. This was held at Mid Beds District offices at Chicksands, Nr Shefford on Monday 4 June from 19.00 to 21.00. The event included a presentation by EERA and an open Question and Answer session.

#### 4. JOINT PLANNING AND TRANSPORTATION COMMITTEE RESPONSE TO THE G+T CONSULTATION

- 4.1 The major issues surrounding provision for the G+T community in Bedfordshire and Luton were discussed at the Bedfordshire & Luton Authorities Planning and Transport Member Liaison Group (Countywide JAC) on 2 November 2006.

Main concerns raised were:

- South Beds considered that the David Couttie Associates (DCA) study did not provide a valid basis for the distribution of pitches.
- Transit Sites were identified as a particular problem in terms of management. The DCA Report felt it would be more appropriate to establish a network of emergency or short-term stopping places sufficient to cater for 45 households per year (not all expected to be occupied at the same time) across the County/Luton. Further work is needed to establish best practice, locations, etc.
- Environmental concerns including Green Belt in South Beds and non-availability of sites in Luton. The growth area review of green belt boundaries and the urban capacity review may provide the opportunity to identify sufficient sites to meet the expected needs.
- Whilst the DCA study might be acceptable in the short-term it does not provide the basis for distribution over a 15-year period (i.e. to 2021). The DCA Report suggests that G+T needs should be re-assessed every 5 years. The DCLG / EERA Study is in general agreement that attempts to forecast beyond 2011 would be problematical.
- G+T locational issues should be subject to Sustainability Appraisal processes.

- 4.2 As noted in 2.3 (above) the “**Bedfordshire & Luton Gypsy & Traveller Accommodation Needs Assessment 2006**” had suggested that 74 additional permanent G+T pitches were required in the County/Luton between 2006 – 2011; with 45 in South Beds/Luton.

- 4.3 The DCLG/GO-East/Regional Assemblies study “**Preparing Regional Spatial Strategy Reviews on Gypsies and Travellers by regional planning bodies**” (3.2 above) includes a detailed benchmarking exercise comparing the level of detail and thoroughness of the information supplied to EERA by local authorities across the East of England. This acknowledged that the information supplied by Bedfordshire / Luton had been very comprehensive and robust. However, despite this commendation and acceptance of all the other figures, the DCLG Study suggests that assumptions made by DCA on likely vacancy rates on existing sites had led to an underestimation of needs. On this basis, it recommends that the number of additional pitches needed in South Beds/Luton; in Option 1 rises to 52 although this still compares favourably with the range 45 to 57 in the DCA Assessment.

- 4.4 EERA also raises the question of whether or not an additional pitch provision should be made for Travelling Showpeople. A Travelling Showpeople assessment was carried out by DCA for all the Bedfordshire authorities and this should be finalised shortly. There is likely to be a requirement in South Bedfordshire of up to 10 pitches over the next 5 years and this should be included therefore in EERA proposals.
- 4.5 The Option 2 alternative of minimum pitch provision for all authorities (15) is not based on environmental or sustainable considerations nor G+T community aspirations. As a principle of arbitrary relocation of provision it should therefore be resisted, particularly as it could be extended as a principle to provide even greater distribution.
- 4.6 EERA also need to be advised of an update in the provision of G+T pitches since the base date. Within South Bedfordshire, through the Development Control process one additional permanent pitch has been provided with up to 7 more likely by the end of the consultation period and a further 3 to follow. (Four temporary pitches have also been provided recently).
- 4.7 EERA need to resolve the issue of pitch provision beyond 2011. The present needs assessment work does not provide a sound basis for estimating pitch provision, so the way forward would be a further review of G+T needs.

## **5 RSS SINGLE-ISSUE REVIEW - TIMETABLE**

### **5.1**

Issues and Options Consultation	08/05/07 – 31/07/07
Analysis of Options / Draft Preferred Options	Aug – Dec 2007
Draft RSS Review	Dec 2007
Public Consultation	Early 2008
Public Examination / Panel Report	Late 2008
Government Publish Proposed Changes	Early 2009
Final RSS Review Published	Late 2009

## **6 IMPACT ON LOCAL DEVELOPMENT PLAN PREPARATION**

- 6.1 Although the exact number of pitches required is still under discussion, the LDDs for Luton/South Beds will need to make provision for the pitch numbers decided in the single issue review. This will include the need for decisions on site location and size (sites of around 5 pitches are considered more easy to manage).
- 6.2 Forecasting G+T needs beyond 2011 will be extremely difficult. However, if suitable sites are to be identified via the Green Belt and urban capacity reviews and possibly funded via s106 or other developer contributions, then at least an estimate of required numbers/locations will need to be considered as part of the LDD process.
- 6.3 In addition, LDDs will need to determine:
- (a) the number and location of 'emergency stopping place' pitches required.(See 2.3 above), and

(b) the number and location of 'travelling showpeople' sites/pitches required.

*(Note: A draft Circular on Revised Planning Guidance for provision of sites for Travelling Showpeople has been published by DCLG and is presently out for public consultation).*