

Traveller SHLAA methodology consultation – July 2013		
Name and organisation	Comment received	Our response

The response form is available at the end of this document, for reference only.

Bat Conservation Trust	<p>This is a summary of the comments we received from the Bat Conservation Trust.</p> <p>The Bat Conservation Trust does not comment on individual sites, but provides general information. The Bat Conservation Trust provided details of a useful guide on the decision making process for determining planning permission, which can be found at:  <a href="http://www.biodiversityplanningtoolkit.com/bats/bio_bats.html">http://www.biodiversityplanningtoolkit.com/bats/bio_bats.html</a></p>	<p>We welcome the comments from the Bat Conservation Trust and thank them for taking the time to respond to our consultation. The guidance they have provided is helpful background information.</p> <p>The presence of bats and their habitats would be a consideration if planning permission were being sought for development. The Traveller SHLAA does not seek planning permission, and the assessment of the suitability of a site does not require the same level of detail as a planning application.</p> <p>If land identified in the SHLAA was found to be unsuitable for ecology reasons or any other reason when planning permission was sought, then the SHLAA would need to be updated to reflect this, especially if the site were identified in our five year supply of deliverable land for Traveller accommodation.</p> <p>We do not need to update the document in response to the comments received.</p>
Department for Communities and Local Government (DCLG)	<p>Due to the Secretary of State's quasi-judicial role in the planning process, we are not able to comment on the specific details of a Local Planning Authority's plan-making process.</p>	<p>We do not need to update the document in response to the comment received.</p>
John Selves, Shared Resident rep with Adrian Small and Neighbourhood watch	<p>Q1 and Q2 – yes.</p> <p>Q4 - Not aware of any suitable Land. The Land Adjacent to Clayton Drive GU29TZ is Green belt</p> <p>Q5 - We do not have the experience or background in this planning.</p>	<p>We thank Mr Selves and Mr Small for taking the time to read the proposed methodology. We note the support with regards to questions 1 and 2, and the response to question 4.</p> <p>We do not need to update the document in response to this comment received.</p>

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Surrey Police (Superintendent Neighbourhoods West Surrey)	We're fully supportive of this methodology.	<p>We are grateful for the support of Surrey Police.</p> <p>We do not need to update the document in response to this comment received.</p>
Waverley Borough Council	SHLAA Forum – do you have any details about who is on this, any terms of reference? We would like to do something similar. Is there any merit in having a shared forum, I think it probably needs to be focussed on the individual borough but a lot of the key developers/RSLs might be the same.	<p>We are grateful to Waverley Borough Council for responding to the consultation, and positively engaging with us and exploring the opportunities for joint working.</p> <p>We have liaised with Waverley Borough Council regarding the terms of reference for the Traveller SHLAA forum.</p> <p>Our Traveller SHLAA forum meetings are due to start shortly. We are happy to share the details of membership of the forum with Waverley Borough Council, should they wish to establish a similar group for their area. We are also willing to explore joint working opportunities regarding the forum in the future.</p> <p>We do not need to update the document in response to this comment received.</p>
Waverley Borough Council	Did you design the criteria in Tables 3 and 4 and Appendix 3 yourself based on the PPTS and CLG Designing Gypsy Sites or did it come from elsewhere?	<p>Table 3 and Table 4 are based on PPTS, NPPF (2012) and Designing Gypsy and Traveller Sites good practice guide (2008). The survey sheet in appendix 3 is based on our agreed survey sheet from the SHLAA.</p> <p>We do not need to update the document in response to this comment received.</p>
Waverley Borough Council	On paragraph 1.3 of the methodology, it talks about identifying a 5 year supply of sites but I don't see any mention of "supply of specific, developable or broad locations for 6-10 and where possible 11-15". Was this deliberate?	This was not a deliberate omission. We have updated paragraph 1.3 to refer to the requirements to identify land or broad locations for years 6-10 and 11-15.
Reigate and Banstead	It was very timely for us as we have been reviewing a	We are pleased to hear that our proposed methodology has been

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Borough Council	draft methodology, we put together a while back, which was used to inform a Public Inquiry and Hearing held a month ago. Guildford's draft has been very helpful as part of the process of reviewing and refining our methodology. In the spirit of the 'duty to cooperate' our methodology now incorporates many features of your approach.	<p>helpful to Reigate and Banstead Borough Council as they look to do this work as well. We are encouraged that Reigate and Banstead is looking to take a similar approach and has incorporated features of our approach.</p> <p>We would like to keep in touch with Reigate and Banstead Borough Council and share experiences and lessons learnt, in the spirit of the duty to co-operate.</p> <p>We do not need to update the document in response to this comment received.</p>
Reigate and Banstead Borough Council	We are expecting to begin a call for sites this month, and also to begin the trawl for potential land to inform our Development Management Policies DPD and Proposals Map.	<p>It is useful for us to know what other councils are doing, and are grateful to Reigate and Banstead Borough Council for providing this information. We look forward to hearing more about the progression of their Development Management Policies DPD.</p> <p>We do not need to update the document in response to this comment received.</p>
Reigate and Banstead Borough Council	I would be happy to share information and ideas and hope you are happy for us to take on board Guildford's approach to the Traveller SHLAA.	<p>We are happy for Reigate and Banstead Borough Council to take on board our methodology where appropriate, and we are happy to share information and ideas.</p> <p>We do not need to update the document in response to this comment received.</p>
University of Surrey	<p>Q1 and Q2 – yes. Q4 – no.</p> <p>Whilst it considers the methodology to be appropriate, the University would note that it would wish to comment further once potential sites and/or broad locations have been identified. At the current time, the University would not intend to make any of its own land available for traveller accommodation,</p>	<p>We note the support with regards to questions 1 and 2, and the response to question 4.</p> <p>If we identify potential development land that is privately owned, we will contact landowners to seek clarification about the availability of land for traveller accommodation. We are grateful to the University for advising us of their current position regarding the availability of land they own for traveller accommodation. However, in accordance with the methodology,</p>

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	which may be a factor to consider under stage 7b (assessing availability) should it be the case that any of the University's land may emerge from the sieving process.	<p>if land owned by the University of Surrey is identified as potentially suitable for traveller accommodation, we will contact the university again to seek specific information about the availability of the land identified.</p> <p>We do not need to update the document in response to this comment received.</p>
Natural England	Paragraph 7.2 in planning process – please note that consideration may need to be given to the possibility of likely significant effects on N2K sites (and impact on SSSIs), arising from changes of use from previously allocated or consented sites, to traveller sites.	We note these comments, however, a change of use to a traveller site would require planning permission. The determination of a planning application requires us to consider relevant planning policies and material planning considerations. Paragraph 7.2 simply lists the source of sites, and we do not need to update it to reflect how we will consider the suitability of these sources of land, as this is addressed later in the document.
Natural England	Paragraph 7.4 is welcomed, in particular your conclusion that land in or near the Thames Basin Heaths Special Protection Area (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI) is inappropriate for new traveller accommodation.	<p>We note the support for this paragraph.</p> <p>We do not need to update the document in response to this comment received.</p>
Natural England	Paragraph 8.3 – it would be helpful to record those cases where the site falls within the <u>setting</u> of the AONB; the distance from and the sensitivity of sites designated for their habitats, biodiversity or geodiversity, or irreplaceable habitats such as Ancient Woodland.	<p>We have updated paragraph 8.3 to include habitat designations.</p> <p>Whilst we do not intend to specifically record the proximity of a site to the AONB, we will consider the potential setting of the AONB in the overall suitability. We will include any appropriate references as we consider suitability. However, we must consider sites within the AONB and the setting of the AONB, as whilst this is a significant consideration, it does not rule out sensitive small scale development, where appropriate.</p>
Natural England	Stage 5 – Consideration should be given to the nature of the site and its context, such as: habitat type, the presence of features such as trees, hedges and	We have updated paragraph 10.2 to include reference to hedges and ditches, and landscape character.

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	ditches, the visibility of the site and the potential of development to impact or mitigate impact on local landscape character, potential “pathways” for impact on local designated habitats.	
Natural England	Stage 7a – The assessment of suitability for traveller accommodation regrettably makes no reference to the natural environment.	We have updated stage 7a to include consideration of the natural environment, in accordance with the requirements of the NPPF.
Natural England	Allocations should avoid: direct or indirect impact on designated habitats (N2K sites and SSSIs), BAP habitats, priority and protected species and irreplaceable habitats such as Ancient Woodlands impact on the AONB and its setting the loss of the Best and Most Versatile Agricultural Land significant impact on local landscape character or visual impact changes to the topography of the site and/or loss features such as streams, hedges and mature trees harm to habitat and ecological networks and Accessible Natural Green Space the loss of potential to enhance the public rights of way network	Thank you for listing these considerations. We will consider them as we look at sites as part of the overall wider consideration of suitability, however, they do not necessarily make a site unsuitable. We will need to look at all of the constraints on the land, and as part of the presumption in favour of sustainable development, and identify the most sustainable land to meet the identified need.  We know we will have to make some difficult decisions as we identify land, but we will seek to avoid any potential harm to our most sensitive landscapes and natural environments.
Natural England	Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your document. Nevertheless, I hope you find these comments helpful. If there are issues I have not	The comments are helpful and we are grateful to Natural England for taking the time to respond.

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	covered, please let me know and I will respond as quickly as possible.	
STAG (Stonebridge Action Group)	New ministry guidelines re Green Belt will need to be included	<p>On 2 July 2013, a ministerial statement by Local Government Minister Brandon Lewis was published. The statement seeks to clarify that the Secretary of State does not consider that the single issue of unmet demand for traveller accommodation is likely to outweigh harm to the Green Belt, and other harm, to constitute the very special circumstances needed to justify inappropriate development in the Green Belt.</p> <p>The Traveller SHLAA is an evidence base document that is prepared in response to an identified need for traveller accommodation. It tests the suitability, availability and viability of land for traveller accommodation. It does not decide whether very special circumstances exist for individual sites.</p> <p>The ministerial statement is a material planning consideration, but it is not a planning policy document, nor does it make new policy. It has not been through consultation or subject to an impact assessment or equalities impact assessment.</p> <p>We have to demonstrate how we plan to meet the need for pitches. Whilst need alone is not sufficient to justify very special circumstances for development in the Green Belt, the absence of alternative suitable available sites, following a detailed SHLAA (including a call for sites, considerable liaison with travellers and assessment of all potential land), would be another consideration under very special circumstances, if a planning application were to be submitted.</p> <p>It is not necessary to specifically refer to this statement in the methodology as it is one of many material planning considerations that could also be listed. However, we have</p>

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		updated the text in paragraph 13.1 to include potential material planning considerations.
STAG (Stonebridge Action Group)	There is no budget either for the total project or per pitch. Without a budget sites could be chosen which prove to be unaffordable, thereby rendering a good methodology worthless.	<p>Through the new Local Plan, our role is to identify the current and future need for Traveller accommodation in our borough, and have a strategy in place to deliver new pitches. We also need to identify a five-year supply of deliverable land for traveller accommodation. It is not our role to physically deliver the pitches and take on any potential cost. Whilst we may choose to do this on land we own, as we sometimes do to provide bricks and mortar affordable homes, we are not required to do this.</p> <p>All sites included in the final Traveller SHLAA must be suitable, available and viable, and be deliverable within a specific timeframe. Sites that cannot be delivered because they are not viable, or because it is unaffordable for the landowner to develop the land, should not be included in the SHLAA, as they would not meet the set criteria stated in the methodology.</p> <p>The Traveller SHLAA is being prepared in house, and is required as part of the preparation of the new Local Plan. This is the same approach we have taken for the housing SHLAA, which has recently been published.</p> <p>We do not need to update the document in response to this comment received. However, we are grateful to STAG for taking the time to read the methodology and respond to the consultation.</p>
Woking Borough Council	Q1 and Q2 – yes.  This appears a thorough methodology.	We are grateful to Woking Borough Council for taking the time to respond and for proving helpful comments. We welcome their support for the proposed methodology.
Woking Borough Council	We note that the appropriate geographical extent for co-operation between councils on the strategic issue of traveller land supply may go beyond just	We have updated paragraph 4.7 accordingly, to say that we will work with other councils where appropriate, as part of the duty to co-operate.

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	neighbouring local planning authorities. The new Traveller Accommodation Assessment findings may assist Guildford Borough Council in identifying all relevant councils.	
Woking Borough Council	It may be useful to confirm in the methodology that pre-application advice - referenced in paragraph 7.2 - will always remain confidential.	We have updated paragraph 7.2 to make sure it is clear that pre-application advice is confidential.
Woking Borough Council	The storage needs associated with plots for Travelling Showpeople could be made more explicit in Table 3. Beyond what is already stated in the 'uses' commentary, perhaps expand the 'physical characteristics' or 'infrastructure' notes.	We have updated Table 3 in the uses section to make it clearer that in particular, Travelling Showpeople often need more space to store equipment and large vehicles.
Woking Borough Council	We suggest also adding the following to the glossary: Local Plan panel, SUDs, Traveller Accommodation Assessment (TAA).	We have added these terms to the glossary.
Worplesdon Parish Council	Land for Traveller accommodation should not be used for carrying out any form of business.	<p>We are grateful to Worplesdon Parish Council for responding to the consultation, and we understand that there may be concerns about land being used for Traveller accommodation and businesses. However, Policy F of PPTS says that we should consider, wherever possible, including traveller sites suitable for mixed residential and business uses. The policy also says that we should have regard to the need that Travelling Showpeople have for mixed-use yards.</p> <p>It therefore would not be in accordance with national planning policy for us to say that a mixed use site would not be suitable. Each site will be looked at on a case by case basis, with regard to all relevant national planning policy and material planning considerations. However, given the general shortage of land for traveller accommodation in the borough, we do not envisage having the option of identifying extra land that could be used for commercial uses, as we are likely to need to make best use of</p>

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		<p>land for accommodation.</p> <p>We will, however, give this significant consideration when looking for land for Travelling Showpeople accommodation, as they do have specific needs to accommodate equipment.</p> <p>We do not need to update the document in response to this comment received.</p>
Worplesdon Parish Council	When with the TAA be issued?	<p>We aim to publish the TAA before we start our Local Plan Issues and Options consultation in October 2013. We can make a factual update to this methodology when the TAA has been published.</p> <p>We do not need to update the document now in response to this comment received.</p>
Worplesdon Parish Council	The Green Belt should be considered inappropriate for new Traveller accommodation.	<p>PPTS says that traveller accommodation in the Green Belt is inappropriate development. We have updated the text in paragraph 4.4 to reflect this.</p> <p>New homes (including traveller accommodation) in the Green Belt may be inappropriate development, but in response to the requirement set out in national planning policy to consider all possible options to meet our objectively assessed housing need, we need to re-examine some of our Green Belt boundaries. We are doing this work through the new Local Plan, informed by our evidence base documents. The Traveller SHLAA is one of many evidence base documents.</p>
Environment Agency	We are pleased to see that the proposed methodology indicates it will adhere to the National Planning Policy Framework (NPPF) and its sister document Planning Policy for Traveller Sites (PPTS). In particular we welcome that the proposed methodology identifies in paragraph 4.4 that it will	<p>We are grateful to the Environment Agency for their comments.</p> <p>We do not need to update the document now in response to this comment received.</p>

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	<p>assess sites in accordance with the need to protect the environment from inappropriate development.</p> <p>Furthermore, paragraph 7.5 of the proposed methodology indicates that it will follow a sequential approach when assessing potential sites for the needs of the traveller community as noted in the NPPF. Once again we welcome this and encourage that suitable land be identified in areas at lowest risk to controlled waters.</p>	
Environment Agency	<p>However, we are concerned with the details of paragraph 7.4. When listing areas that are deemed inappropriate for new traveller accommodation it fails to state that flood zone 3b (functional floodplain) is inappropriate. We acknowledge that functional floodplain in the Guildford Borough is classified in different ways depending on the location. For instance, your Strategic Flood Risk Assessment (SFRA) defines functional floodplain within the main Guildford urban area as delimited by the top of the bank. In other words it is within the channel. However, outside of the main urban area functional floodplain spreads beyond the top of the bank and therefore, creates a wider flood zone. Functional floodplain or flood zone 3b is defined in the Technical Guidance to the NPPF as land “where water has to flow or be stored in times of flood.” Furthermore, it notes that only water compatible development and on some occasions essential infrastructure should be located in this flood zone. Therefore, it is not appropriate to allocate land for Traveller accommodation in this area and we request that the wording of paragraph 7.4 be changed to reflect this.</p>	<p>We understand the concerns of the Environment Agency. We have updated the text in paragraph 7.4 to say that we will not consider land that is in the functional flood plain (flood zone 3b).</p> <p>We have retained the text in paragraph 7.5, as if we cannot identify the land we need for Traveller accommodation in flood zones 1 and 2, we may need to consider land in flood zone 3a, if it is available. Development in this area would be subject to a flood risk assessment that shows that the site would be safe, that flood risk would not be increased in the area, and that the development took all available opportunities to reduce flood risk on site and in the local area.</p>

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Environment Agency	Table 3, paragraph 13.2 provides an overview of what land should be potentially considered. We welcome that under „Environmental Considerations“ it notes that land adjacent to waste handling or landfill sites and contaminated land should not be considered. However, once again we ask that sites located in flood zone 3b be noted as land that should not be considered.	We have updated table 3 accordingly to correspond with the update we have made regarding the functional flood plain (as discussed above).
Environment Agency	Furthermore, under the heading „Physical Characteristics“ it states that land should be capable of providing safe access for all required vehicles and caravans. As previously acknowledged we are aware that a sequential approach will be applied to identification of sites. Nevertheless, if sites are identified in land designated as flood zones it is important to remember that safe access and egress from the site to an area outside of the flood event will be required. In some instances this may not be possible and consequently the site would be deemed unsuitable.	We have updated the section on physical characteristics in table 3 accordingly, regarding safe access and egress from an area of flooding.
Environment Agency	Yet while it may be of more benefit to assess this criteria when an initial site survey/allocation has been carried out, it is still worth bearing in mind at these early stages. We trust that the information in this letter will be of benefit to you. If we can be of any assistance during this process or if you have any queries please feel free to contact me.	The comments from the Environment Agency are useful, and we have made updates to the document accordingly. We will contact the Environment Agency if we need any site specific advice as part of the Traveller SHLAA.
Effingham Parish Council	Q1- no.  In relation to the response to Q1 of no, Effingham Parish Council said the following;	We are grateful to Effingham Parish Council for responding to the consultation.  We are aware that there will often be a preference for bricks and mortar housing by private developers, as the financial return may

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	<p>The methodology may be detailed, however, with pressure for any available land in settlement areas to be developed for housing it is more profitable for developers, and currently for Councils, to have regular homes and receive the CIL.</p>	<p>be greater. However, we believe there are travellers who own land in our borough who may wish to develop their land for Traveller accommodation for themselves and their families. We hope to identify such land through the Traveller SHLAA process. For example, planning permission has recently been granted for four new permanent pitches on land designated as countryside beyond the Green Belt. This land could also have gained planning permission for bricks and mortar housing (subject to consideration of the relevant planning issues), but the landowner chose to seek permission for traveller pitches to provide homes for themselves and their family.</p> <p>We do not need to update the document in response to this comment received, as it states how we intend to find out about potential land owned by travellers through the formation of a Traveller SHLAA forum.</p>
Effingham Parish Council	<p>Q2 – no.</p> <p>In relation to the response to Q2 of no, Effingham Parish Council said the following;</p> <p>The Methodology may appear extensive, however, the wishes of the local community and the travelling community with regards to new sites, must be taken into account as with any planning application decisions.</p>	<p>We recognise and understand residents' interest in this work. We will be liaising with representatives on the Traveller SHLAA forum as we progress the study. When the Traveller SHLAA is published, there will not be consultation on its findings, although we will be happy to consider factual updates where appropriate.</p> <p>The Traveller SHLAA will inform the new Local Plan. There are several opportunities for consultation with local communities as we prepare our new Local Plan, as set out in our Local Development Scheme.</p> <p>If planning applications are submitted to us for development of any land identified in the Traveller SHLAA, residents will have the opportunities to make representations, in accordance with our Community Involvement in Planning document.</p> <p>We do not need to update the document in response to this</p>

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Effingham Parish Council	It is very important that if land bordering/within existing sites becomes available for new pitches in the Borough, priority would be given to families of travellers who have out-grown existing pitches on that site.	<p>Whilst we have a waiting list for public pitches which we can allocate in accordance with our agreed criteria, PPTS says that we should determine applications for sites from any travellers and not just those with local connections. However, we can provide local affordable homes through rural exception policy, and this would allow for affordable pitches for local people in need.</p> <p>Stage two of the methodology says that we will consider land that could be used as a rural exception site.</p> <p>We do not need to update the document in response to this comment received.</p>
Effingham Parish Council	Does any of this take account of the possibility of housing in social/housing association properties or private rental sector? Does it need to be new plots for new homes?	<p>We are not entirely sure of the meaning of this comment. If the comment relates to the possibility of Travellers being accommodated in bricks and mortar housing, this would be an option for travellers that chose this type of accommodation. Some travellers choose to live in bricks and mortar housing, but equally, many travellers have an aversion to bricks and mortar and have a right to live in their cultural traditional way.</p> <p>We need to provide new pitches for Travellers and Travelling Showpeople in accordance with the need identified in the Traveller Accommodation Assessment.</p>
Effingham Parish Council	We are concerned about the policy to allocate green belt land if other suitable land cannot be found. With green belt land under pressure from proposed housing development allocations all land in the South East is at a premium, and with other groups in the population being forced to seek accommodation outside the SE such as young people and some people on benefits who breach the benefits cap (especially housing benefits), then gypsy and traveller	PPTS requires us to meet our identified need for Traveller pitches, and the NPPF requires us to attempt to sustainably meet as much of our objectively assessed housing need as possible. We are not able to redistribute that need for new homes or pitches to areas outside of the South East. People may chose to move to other areas, but there is no policy in place to enforce this for any type of housing. Such a local policy would not comply with national planning policy, nor would it necessarily be effective, as the demand for new homes is higher in the South East than some

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	accommodation should be treated in the same manner, and a greater provision be allocated to counties outside the SE.	<p>other areas of the country.</p> <p>We know we may need to use land that is currently Green Belt in the future to help meet our need for bricks and mortar housing, and we may need to take the same approach for traveller accommodation. We cannot rule out this possibility for traveller accommodation when we know we may need to consider new bricks and mortar homes on land currently Green Belt. We do recognise the importance of protecting the Green Belt, and we will seek to achieve this as much as possible.</p> <p>We have updated the text in paragraph 4.4 to say that new traveller accommodation in the Green Belt is inappropriate development. We cannot change the text to rule out Green Belt though from the land that we will consider, for the aforementioned reasons.</p>
Effingham Parish Council	Is there any information or research on the migratory patterns of the traveller families both currently on pitches within GBC and on the waiting list - i.e., are families staying in one location for considerable/generational periods of time (the periodicity) or are they more transient? This is important in terms of determining whether the needs are likely to increase over time or whether the sometimes more transient nature of families equates to an "average" of needs of families arriving in the borough and families leaving the borough which may remain stable over time.	The Traveller Accommodation Assessment will provide information on current and future needs.
Effingham Parish Council	How will GBC ascertain whether people on the waiting lists have pitches or are on lists in other areas in the country?	Currently any traveller is able to register on our waiting list for public pitches. Whilst the number of people on the waiting list is a consideration when determining planning applications, it is always treated in the context of the fact that it does not represent local need, and that travellers can register on many lists

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		<p>in different boroughs.</p> <p>The TAA will identify what our need for accommodation is, and will be the main indicator of need when determining planning applications.</p>

## Response form

### Traveller Strategic Housing Land Availability Assessment (SHLAA) – proposed methodology

Please complete this response form and return it to us by 26 July 2013.

Response forms can be emailed to us at [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk) or posted to us at Planning policy, Planning Services, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB.

		Yes	No
Q 1	Do you think this methodology will help us to make realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for traveller accommodation?		
Q2	Do you think this methodology will result in a robust traveller SHLAA that can withstand scrutiny?		
Q3	If you answered no to Q1 or Q2, please can you explain your answer below?		
Q4	Do you know of any land in our borough that may potentially be suitable for traveller accommodation? If so, please provide details below.		
Q5	If you have any other comments that will help us with this work, please provide them below.		
Your contact details			
Name			
Organisation			
Address			
Email address			