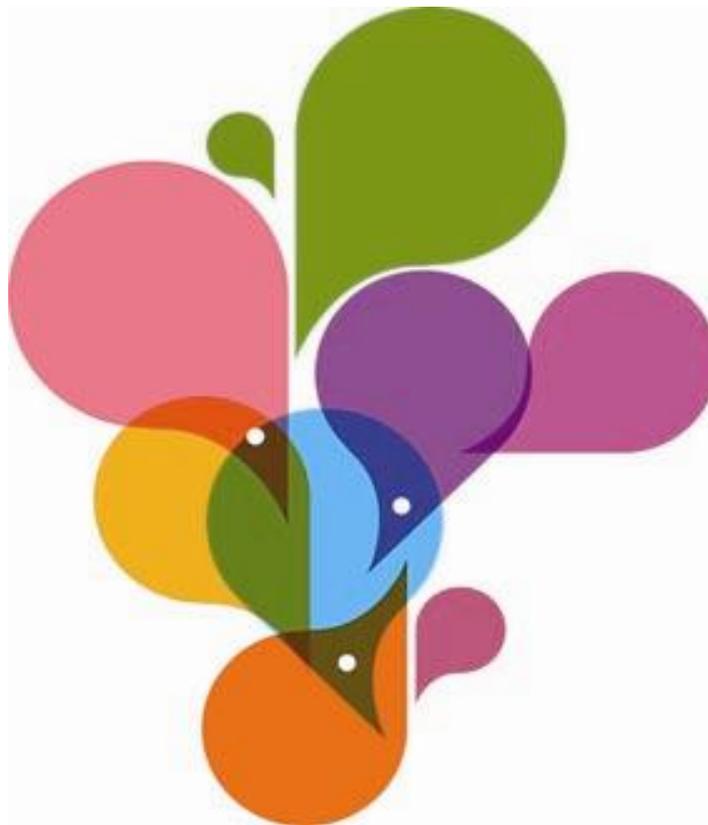


Guildford borough

Traveller Accommodation

Assessment

Consultation Record



June 2017

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<p>Disclaimer We do not accept liability for any decisions made based on the information in the Traveller Accommodation Assessment for Guildford borough consultation record, as there may be errors and omissions beyond our control.</p>

Introduction

The purpose of this consultation record

Planning Policy for Traveller Sites 2015 highlights that local planning authorities should pay particular attention to early and effective community engagement with both settled and traveller communities, to cooperate with travellers and their representative bodies and other local authorities. This record has been prepared to show the consultation undertaken during the drafting of the Traveller Accommodation Assessment for Guildford borough 2017.

Although formal consultation is not required when preparing a piece of evidence base, this document is useful as it sets out:

- the different stages of consultation and the methods used
- who the Council consulted and how they were consulted
- the main issues raised through consultation and how they were addressed
- how the Council raised awareness of the interviews.

Consultation on the questionnaire and methodology

The Traveller Accommodation Assessment questionnaire is a vital part in gaining an understanding traveller accommodation needs. The original questionnaire used in 2012 was drawn up in consultation with traveller's representatives and travellers themselves. Officers representing the 11 Surrey local authorities attended the Surrey Gypsy and Traveller Community Relations Forum in June 2011 to explain the questionnaire and raise awareness of the Surrey traveller accommodation assessments and why it was important for travellers to participate. A summary of the consultation undertaken is also available in section 4 of Preparing Travellers' Accommodation Assessment (TAAs) – The Surrey Approach (April 2012).

Who was consulted on the original questionnaire?

All those consulted at the early stage were sent an email on 24 August 2011 seeking comments by 23 September 2011. A copy is attached in appendix 1. The draft questionnaire was sent to:

- Derbyshire Gypsy Liaison Group
- Friends Families and Travellers
- Gypsy Council
- Showmans Guild of Great Britain
- Surrey Gypsy and Traveller Community Relations Forum

- Surrey County Council – Estates Planning and Management
 - The Irish Travellers Movement in Britain
 - Traveller Law Reform Project
 - Voluntary Action – South West Surrey
 - Elmbridge Borough Council
 - Epsom and Ewell Borough Council
 - Guildford Borough Council
 - Mole Valley Borough Council
 - Reigate and Banstead Borough Council
 - Runnymede Borough Council
 - Spelthorne Borough Council
 - Surrey Heath Borough Council
 - Tandridge Borough Council
 - Waverley Borough Council
 - Woking Borough Council
- Including officers from housing, planning and site liaison officers

Who was consulted on the updated questionnaire?

The questionnaire was updated to reflect changes introduced by Government, particularly the new planning definition of a traveller. The updated draft questionnaire was emailed on 13th December 2016 to the following contacts inviting comments:

- Derbyshire Gypsy Liaison Group
 - Friends Families and Travellers
 - Gypsy Council
 - Showmans Guild of Great Britain
 - Surrey Gypsy and Traveller Community Relations Forum
 - Surrey County Council contacts
 - The Irish Travellers Movement in Britain
 - Traveller Law Reform Project
 - Voluntary Action – South West Surrey
 - Elmbridge Borough Council
 - Epsom and Ewell Borough Council
 - Guildford Borough Council
 - Mole Valley Borough Council
 - Reigate and Banstead Borough Council
 - Runnymede Borough Council
 - Spelthorne Borough Council
 - Surrey Heath Borough Council
 - Tandridge Borough Council
 - Waverley Borough Council
 - Woking Borough Council
- Primarily to planning officer contacts

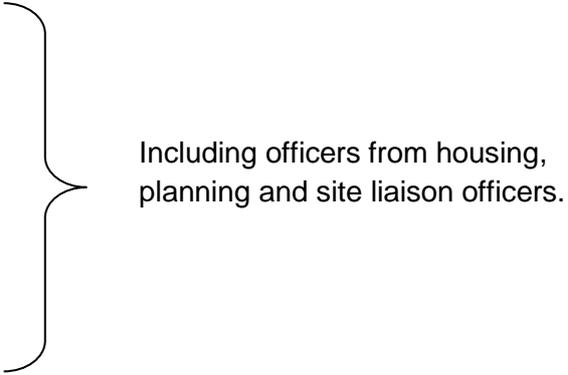
A copy of the email is attached in appendix 2.

Key issues raised

The key issues raised to the draft questionnaire and the response and actions are summarised in the table in appendix 9. The updated questionnaire reflects the feedback received where appropriate.

Who was consulted on the methodology?

The original draft methodology for undertaking a traveller accommodation assessment was sent to:

- The Derbyshire Gypsy Liaison Group
 - Friends Family and Travellers/ Gypsy and Traveller Law Reform
 - The Irish Travellers Movement in Britain
 - Gypsy Council
 - Surrey Gypsy and Traveller Community Relations Forum (John Hockley, Ann Wilson and Monica Vidal)
 - Friends Family and Travellers/Surrey Gypsy and Traveller Community Relations Forum (Charmaine Valler)
 - Showman's Guild of Great Britain (Ray Smith)
 - Surrey County Council Estates Planning and Management (Amanda Boyton)
 - Voluntary Action – South West Surrey
 - Elmbridge Borough Council
 - Epsom and Ewell Borough Council
 - Guildford Borough Council
 - Mole Valley Borough Council
 - Reigate and Banstead Borough Council
 - Runnymede Borough Council
 - Spelthorne Borough Council
 - Surrey Heath Borough Council
 - Tandridge Borough Council
 - Waverley Borough Council
 - Woking Borough Council
- 
- Including officers from housing, planning and site liaison officers.

How were they consulted?

All those consulted at this early stage were sent an email on 20 February 2012 seeking comments by 9 March 2012.

A copy of the email sent is below:

On behalf of the eleven Surrey Districts and Boroughs, I am attaching for your information and comment a draft methodology for identifying future pitch/plot requirements for Gypsies, Travellers and Travelling Showpeople in Surrey.

The methodology has been devised by the Surrey Districts and Boroughs working together.

This piece of work follows on from some joint work we did to prepare a questionnaire that could be used to find out the accommodation requirements of travellers. The draft questionnaire was the subject of a previous round of consultation to which you replied. It has been revised in the light of the consultation and incorporated into the draft methodology at Appendix 3. It is not part of the current consultation.

It is intended that the methodology will be followed by local planning authorities in Surrey to assist them in identifying the number of pitches/plots that are required to meet the accommodation requirements of traveller families in the future. This will be translated into the identification of specific sites through the preparation of appropriate Development Plan Documents.

We are keen to make progress with this work and would be grateful if you could let me have your comments on the draft methodology by **Friday 9th March**.

I am also writing to Emma Nuttall for her comments as well.

If you have any questions please do not hesitate to contact me or my colleague Suzanne Parkes.

Regards

Jack Straw
Mole Valley District Council

Key issues raised

Two letters were received in response to the email and the comments were taken into account whilst drafting the final version of the methodology.

A small number of typographical errors and formatting issues were also identified. These were amended accordingly.

Raising awareness of the interviews

To prepare for the interviews in 2017 with Guildfords travelling community our consultants, Mill Field Services were provided with questionnaires, ward and parish maps, site location maps, and site suggestions forms should a person being interviewed know of any suitable sites for future pitches or plots. A list of known Gypsy, Traveller and Travelling Showpeople sites were provided. These consisted of public sites, private sites, unauthorised sites, and sites with temporary planning permission. Mill Field Services also contacted local travellers on the site waiting list to see if they wished to take part in the interviews.

Emails were sent to Guildford Borough Councillors and all Guildford Parish Councils to let them know about the interviews and to raise awareness within the travelling community, particularly if they knew of travellers living in bricks and mortar housing who may want to get involved.

Emails to raise awareness (see appendix 3) were also sent to:

- Surrey Community Action
- Showmans Guild of Great Britain
- Friends Families and Travellers
- Irish Travellers Movement in Britain
- Surrey Gypsy Traveller Communities Forum
- Surrey County Council
- Voluntary Action South West Surrey
- Surrey Brighter Futures – Gypsy Roma Travellers Accommodation Group
- Gypsy Roma Traveller Voice

Posters and information postcards (see appendix 6) were displayed at the Council offices main reception. Guildford and Horsley libraries were provided with posters and postcards. As Ash is known to have a Gypsy and Traveller community living in bricks and mortar housing it was a particular focus for raising awareness and for providing display material. Posters and information postcards were sent to the Ash Centre, Ash library, Ash Manor School and Ash Grange Primary School and Walsh C of E Junior school, in order to raise awareness of the study, particularly to those travellers living in bricks and mortar housing that may want to be interviewed. The schools were asked if possible to include information on the forthcoming interviews in their parent's newsletter.

Community Safety Wardens were notified and given information postcards to distribute to travellers living on sites and within bricks and mortar housing. The Community Development Manager also visited travellers on certain traveller sites to raise awareness of when the interviewers would be visiting and to explain about the interviews. Mill Field Services notified Surrey Police of their fieldwork dates, contact information and vehicle registration details.

Whilst undertaking the interviews Mill Field asked specifically, as part of the interview, whether those being interviewed knew of any traveller living in bricks and mortar that may want to be interviewed. They also handed out information postcards on sites. The postcard explained when the interviewers would be out and about and how to get in touch if they wanted to be involved and interviewed.

The Council also made all information available on its website (see appendix 7 and 8) and with a twitter update. Information was also posted on the Guildford Borough Council planning facebook page.

Our consultants, Mill Field Services interviewed 121 households in total, 26 households on public sites, 53 households on private sites, 2 telephone interviews, 17 Travelling

Showpeople households and 25 households living in bricks and mortar housing. Occupants of two authorised sites and 1 unauthorised site did not want to be interviewed, 2 sites were vacant with the households possibly away travelling, and there were 19 no-contact sites (which were visited a minimum of three times at various times of the day and evening).

This is a great result when compared with the 2012 TAA which had 98 interviews and 2006 GTAA which had 64 interviews with travellers living within Guildford borough.

Involvement with the draft Traveller Accommodation Assessment

As the Traveller Accommodation Assessment is a piece of evidence base full public consultation is not appropriate or necessary.

Talking to our neighbours

Although the Traveller Accommodation Assessment for Guildford borough specifically looks at the Housing needs of local travellers, we also wanted to gain an understanding of the issues facing neighbouring authorities. We have a duty to cooperate¹ with neighbouring authorities so we contacted them to find out more about their traveller accommodation needs.

During an early stage of evidence gathering for our Traveller Accommodation Assessment, we contacted councils sharing a boundary with Guildford borough - Elmbridge, Mole Valley, Rushmoor, Surrey Heath, Waverley and Woking Councils - asking questions about traveller accommodation and cross boundary issues.

We asked neighbouring councils:

- Are there any cross boundary issues that you believe we should take into account relating to the assessment of accommodation need for travellers?
- What existing provision is there for travellers in your area, including transit sites?
- Have any pitches or plots been granted planning permission in your borough, or allowed at appeal since 2012?
- Are there sufficient pitches and plots in your borough to meet the accommodation needs of travellers in your area now and over the lifespan of your Local Plan?
- Have you had any short-term unauthorised encampments in the past year, and if so do you think there is a need for more transit provision?
- How is your Council identifying future need for traveller accommodation, and what are the timescales for this work?
- How are you planning on meeting the accommodation needs of travellers in your borough?

¹ The Localism Act 2011 requires neighbouring local authorities or groups of authorities to work together on planning issues.

- How are you addressing the accommodation needs for travellers that no longer meet the planning definition of traveller and that have stopped travelling permanently?

A summary of the responses to these questions are included in the Traveller Accommodation Assessment 2017. The responses highlighted that the main cross-boundary issues are considered to be transit sites to meet the needs of the wider area, consistency when assessing Travellers accommodation needs and to share any information which could impact on another assessment. We continue to work closely with adjacent councils.

Who was involved in the Traveller Accommodation Assessment?

A group of targeted individuals were contacted for their feedback on the draft Traveller Accommodation Assessment. The group consisted of:

- Guildford Borough Councillors on the Local Plan Panel (Councillors Reeves, Bilbe, Davis, Wicks, Hogger, Furniss, Spooner, Brooker, Rooth)
- Tracey Coleman, Guildford Borough Director of Planning and Regeneration
- Stuart Harrison Guildford Borough Planning Policy Manager
- Samantha Hutchison, Guildford Borough Community Development Manager
- Colleagues in the Guildford Borough Community Services and Housing Team
- Guildford Borough Council Legal Department

We contacted Surrey authorities and a copy of the email sent is in Appendix 4.

- Elmbridge Borough Council
- Epsom and Ewell Borough Council
- Mole Valley Borough Council
- Reigate and Banstead Borough Council
- Runnymede Borough Council
- Rushmoor Borough Council
- Spelthorne Borough Council
- Surrey County Council
- Surrey Heath Borough Council
- Tandridge Borough Council
- Waverley Borough Council
- Woking Borough Council

We also emailed key stakeholders to seek their views on the draft TAA and a copy of the email sent is in Appendix 5.

- Friends Family and Travellers
- The Irish Travellers Movement in Britain
- Surrey Gypsy and Traveller Community Relations Forum
- Showman's Guild of Great Britain

- Travelling Showpeoples representative from Whittles Drive
- Surrey Community Action
- Opinion Research Services (Steven Jarman)
- Local community representatives

How were they consulted?

All those consulted at this stage were sent an email on 18 May 2017 seeking comments by 29 May 2017. Copies of the emails to Surrey Authorities and stakeholders are attached in appendix 4 and 5.

How were they involved?

The key contacts and stakeholders were sent a copy of the draft Traveller Accommodation Assessment and asked for their views.

Key issues raised

Eight responses were received and the comments were taken into account whilst drafting the final version of the Traveller Accommodation Assessment.

The feedback received in response to the draft Traveller Accommodation Assessment for Guildford borough is summarised in Appendix 10.

Conclusions

Throughout the preparation and the drafting of the Guildford Borough Traveller Accommodation Assessment 2017 we have consulted with traveller representatives, community representatives and other local authorities. This document demonstrates how we have gone about this, and the high levels of interviews with our traveller community and feedback on the draft Traveller Accommodation Assessment show how effective this has been.

Appendix 1 Consultation letter on original questionnaire

Andrew Bircher
Corporate Head of Service



Sent via Email

Our ref: Gypsy, Traveller and Travelling Showpeople
Accommodation Needs Questionnaire

Your ref:

If telephoning please ask for: Jack Straw
Planning Policy Manager
01306 879246

Email: jack.straw@molevalley.gov.uk

24th August 2011

Dear Sir/Madam

SURREY AUTHORITIES GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMMODATION NEEDS QUESTIONNAIRE – CONSULTATION

Over the last eighteen months there have been a number of changes to the national planning framework which have impacted on how local planning authorities assess the need for new pitches for Gypsies, Travellers and Travelling Showpeople within their area and how this identified need is to be delivered. Within the Surrey context this includes the abandonment of the South East Plan Panel Report into the Review for Gypsy, Traveller and Travelling Showpeople Provision and, at a national level, the publication of the proposed Planning Policy Statement (PPS) 'Planning for Traveller Sites' (April 2011).

On behalf of the 11 Boroughs and Districts in Surrey, I am writing to inform you of how we intend to address the implications of these changes and also seek your advice as to how to best assess the need for new pitches across the County.

Gypsy, Traveller and Traveller Accommodation Assessments (GTAAAs)

In 2006/07 three Gypsy and Traveller Accommodation Assessments (GTAAAs) were carried out across Surrey covering north, east and west Surrey as required by Circulars 01/2006: Planning for Gypsy and Traveller Caravan Sites and 04/2007: Planning for Travelling Showpeople. The GTAAAs provided information on the need for new pitches across Surrey between 2006 and 2011.

Information from the GTAAAs along with other evidence and consultation responses were used to inform the Partial Review of the South East Plan which sought to identify the accommodation needs of the travelling community in the region and provide a pitch requirement for each local authority.

The Review of the South East Plan reached examination in February 2010 when the draft distribution of pitches was considered by a panel of Government Inspectors. However, prior to the publication of their Report, the Coalition Government came to power and announced their

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Minicom
01372 819094
Document Exchange
DX 57306 Dorking

intention to abolish Regional Spatial Strategies (RSSs) (i.e. the South East Plan) including the Partial Review of Gypsy and Traveller Accommodation. The Government has announced that it will not be asking the Panel to complete its report, be considering its recommendations or complete the process of approving the partial review of the South East Plan.

Proposed Planning Policy Statement - Planning for Traveller Sites

On 12th April the Communities for Local Government (CLG) published '*Planning for Traveller Sites*' for consultation. This draft Planning Policy Statement (PPS) is intended to replace the existing Circular advice on planning for Gypsy and Traveller Caravan Sites (01/2006) and Planning for Travelling Showpeople (04/2007). The consultation paper proposes to shift responsibility for determining the level of future pitch provision from the regional planning process down to individual local authorities, based on robust evidence of local need in the light of historical demand.

Under the Government's proposed policy, local planning authorities will continue to assess the accommodation needs of travellers (as required by the Housing Act 2004). However, unlike the advice in the current circulars the Government's proposed policy does not specifically refer to the *Gypsy and Traveller Accommodation Needs Assessment* guidance that sets out how needs should be assessed for the purposes of the Housing Act.

Whilst the consultation paper indicates the Government is keen that planning policy highlights the importance of ensuring that targets are based on robust evidence, it does not consider it necessary for the Government to prescribe to local planning authorities the type and volume of evidence required, especially as their conclusion will be tested through the process of consultation and Examination in Public of local plans.

This approach to evidence gathering reflects the Government's proposal that local authorities set their own evidence based targets for the provision of pitches/plots. The proposed policy does not dictate what targets local planning authorities should adopt. This is to be a matter for local planning authorities to decide for themselves depending on the circumstances in their particular area.

The Surrey Approach

The GTAAs are now around five years old and the Surrey authorities recognises the need to replace them with a new and up-to-date assessment of the accommodation needs of Gypsies, Travellers and Travelling Showpeople taking into account household change, movement in and out of Surrey and natural demographic changes generally. This will ensure the evidence on the need for additional pitches is up-to-date for use in preparing local plan documents.

In light of the Government looking to 'streamline' the planning process and not prescribe planning guidance on undertaking assessments, the Surrey authorities have agreed that the methodology and accommodation assessments themselves should deal solely with identifying the number of pitches required rather than having a wider remit to include assessments of the condition of sites and the education/health needs of households. It is considered that information around these issues is already collected by Traveller Education and Adult Social Care Teams and that management of most public sites in the county is under the control of Surrey County Council who carry out weekly inspections of the sites.

The Surrey authorities have concluded that by focussing the next round of assessments on the future need for pitches, there is a greater prospect of achieving the robust evidence needed to inform the preparation of local plans.

Consultation on a draft Questionnaire

Moving forward with the assessment for new pitches for Gypsies, Travellers and Travelling Showpeople, the Surrey authorities have drafted a questionnaire which alongside other sources of information (caravan counts, authorised encampment data etc) will be used to gather the data required to assess accommodation need.

As a representative of the Travelling Community we sincerely welcome your comments on the draft questionnaire (please find enclosed). Comments should be received by **FRIDAY 23RD SEPTEMBER 2011** and sent to:

Email – suzanne.parkes@molevalley.gov.uk

Or,

Post – Planning Policy Team, Mole Valley District Council, Pippbrook, Dorking, Surrey,
RH4 1SJ

Consideration should be given to whether the questionnaire is sufficient to identify the required number of new pitches across each local authority area or whether additional questions are needed.

Next Steps

Once responses to the draft questionnaire consultation have been received it will be amended where necessary. Consideration is currently being given as to how the surveys will be undertaken. This includes:

- whether to use consultants to prepare the study and/or undertake the interviews.
- whether there should be one study for the county of Surrey; group studies of 1 or more local authorities or 11 individual studies.
- when is the most appropriate time to undertake the surveys given the travelling heritage of Gypsies, Travellers and Travelling Showpeople.

The approach taken will largely depend on the resources of each local authority and the stage they are at in preparing their local plan i.e. in some local authority areas the need to undertake a new survey is more urgent than in others in terms of how it feeds into their plan making preparations. However, if you wish to make any comments on the above points please feel free to do so. The Surrey authorities are very much looking to work in partnership with your organisation so that a robust assessment of accommodation need can be undertaken.

If you have any queries regarding this work please do not hesitate to contact me via email – jack.straw@molevalley.gov.uk or phone 01306 879246. You can also discuss this work with my colleague Suzanne Parkes (suzanne.parkes@molevalley.gov.uk / 01306 879144).

We look forward to receiving your comments.

Yours Faithfully

Jack Straw

Jack Straw
Planning Policy Manager
On behalf of the Surrey Boroughs & Districts

Appendix 2 Email on updated questionnaire 2017

Dear All,

Guildford Borough Council are planning on updating our Traveller Accommodation Assessment next year, and as part of this process we hope to undertake interviews with our travelling community early next year.

The existing Traveller Accommodation Assessment is dated 2012 and is available to view on our website at: www.guildford.gov.uk/taa.

To reflect recent relevant changes in Government legislation and guidance since 2012, the questionnaire for the Traveller Accommodation Assessment has been updated slightly, please find copy attached.

If you have any comments on the updated questionnaire I'd be really interested to hear from you. I appreciate it is a very busy time of the year, but if you could get back to me by 3 January I would really appreciate it.

Kind regards

Kate Lines
Senior Planner, Planning Services
01483 444662 www.guildford.gov.uk
Guildford Borough Council, Millmead House, Guildford, Surrey GU2 4BB

Appendix 3 Email on the forthcoming Traveller Accommodation Assessment interviews 2017

Dear All

We are planning on updating our Traveller Accommodation Assessment and as part of this process will undertake interviews with our travelling community.

From Monday 16 January to 1 February 2017 Mill Field Services, on behalf of Guildford Borough Council, will be going to known Gypsy and Traveller and Travelling Showpeople sites across Guildford borough to interview travellers about their likely housing needs over the next 5 years. We have also asked Mill Field Services to interview travellers that are living in bricks and mortar housing in Guildford borough to hear about their housing needs. If you know of any Guildford based traveller, particularly those living in bricks and mortar housing that we may be unaware of, that may want to be interviewed please refer them to Sam Hutchison or Teri Hepburn on 01483 444891 or alternatively email planningpolicy@guildford.gov.uk with their contact details and address.

If you could help raise awareness with our travelling community that the interviewers will be around over the next few weeks I'd really appreciate it.

Kind regards

Kate Lines

Appendix 4 Email sent to Surrey authorities on draft Traveller Accommodation Assessment.

Dear Colleagues,

A Traveller Accommodation Assessment for Guildford borough has recently been drafted and I would be interested in any comments you may have. The document is **confidential** at this stage so your discretion would be greatly appreciated.

This TAA is based upon interviews undertaken with our travelling community in January 2017 and has taken into account Planning Policy for Traveller Sites (2015) and the changes to the definition of a traveller.

What are the key findings?

The TAA shows there is a need over the Local Plan period to 2034 for:

- 4 pitches for Gypsies and Travellers as defined by Planning Policy for Traveller Sites (PPTS)
- 41 pitches for Gypsies and Travellers who do not meet the PPTS definition
- 8 pitches to meet potential additional need of households of unknown planning status.
- 4 plots for Travelling Showpeople as defined by Planning Policy for Traveller Sites (PPTS)
- 4 plots for Travelling Showpeople who do not meet the PPTS definition

This addresses the backlog of need from overcrowding, doubling-up on sites, concealed households, unauthorised encampments or developments, temporary planning permissions and those living in bricks and mortar housing but with a need to be on a site. It also addresses the future demand for accommodation. Our forthcoming plan is proposing to meet the need through site allocations.

As part of our commitment to engage neighbouring authorities and other bodies on an active and on-going basis on issues of a cross-boundary nature, we would welcome your comments on the draft report. All comments received will be taken into account and any necessary amendments made prior to finalisation.

If you have any feedback on the draft TAA please could you let me know by **Monday 29th May**, and if you have any queries in the meantime please do not hesitate to get in touch.

Kind regards,

Kate Lines

Senior Planner

www.guildford.gov.uk

Guildford Borough Council, Millmead House, Guildford, Surrey GU2 4BB

Appendix 5 Email sent to key stakeholders on draft Traveller Accommodation Assessment.

Dear Sir/Madam

A Traveller Accommodation Assessment for Guildford borough has recently been drafted and I wondered whether you'd be happy to read the document and let me know what you think? The document is **confidential** at this stage so your discretion would be greatly appreciated.

A brief overview is set out below.

What is the Travellers Accommodation Assessment (TAA)?

The Traveller Accommodation Assessment (TAA) is part of the evidence that informs the preparation of the new Local Plan. The TAA identifies the number of pitches and plots required to meet the accommodation needs of travellers residing or resorting to our borough. It does not determine where these pitches and plots will go.

How is a traveller accommodation assessment prepared?

Planning Policy for Traveller Sites (PPTS) (2015) puts the provision of new pitches and plots into the hands of councils. It requires us to make our own robust assessment of need and set targets for pitch or plot provision to address the likely permanent and transit accommodation needs of travellers in this borough. PPTS has introduced changes to the definition to traveller, so it only includes those people who still travel or have ceased to travel temporarily.

To assess our travellers accommodation needs we have carried out interviews with the travelling community, and these were carried out by our consultants Mill Field in January 2017. The findings from the interviews and other information and data is then combined to calculate the need for new pitches and plots.

The TAA is a technical study, and it is based on evidence available when interviews with the travelling community took place in January 2017. Factors such as granted or refused planning permissions may well have changed since this time, however they will be accounted for subsequently.

What are the key findings?

The TAA shows there is a need over the Local Plan period to 2034 for:

- 4 pitches for Gypsies and Travellers as defined by Planning Policy for Traveller Sites (PPTS)
- 41 pitches for Gypsies and Travellers who do not meet the PPTS definition
- 8 pitches to meet potential additional need of households of unknown planning status.
- 4 plots for Travelling Showpeople as defined by Planning Policy for Traveller Sites (PPTS)
- 4 plots for Travelling Showpeople who do not meet the PPTS definition

This addresses the backlog of need from overcrowding, doubling-up on sites, concealed households, unauthorised encampments or developments, temporary planning permissions and those living in bricks and mortar housing but with a need to be on a site. It also addresses the future demand for accommodation in the next five years from adult children wanting to leave home and create a separate household. Our forthcoming plan is proposing to meet the accommodation needs through site allocations.

If you have any feedback on the draft TAA please could you let me know by **Monday 29th May**, and if you have any queries in the meantime please do not hesitate to get in touch.

Appendix 6 Posters and postcards made available in the main reception of the Guildford Borough Council offices, Millmead, Guildford.

GUILD FORD B O R O U G H

Gypsy, Traveller and Travelling Show people Accommodation Assessment 2017

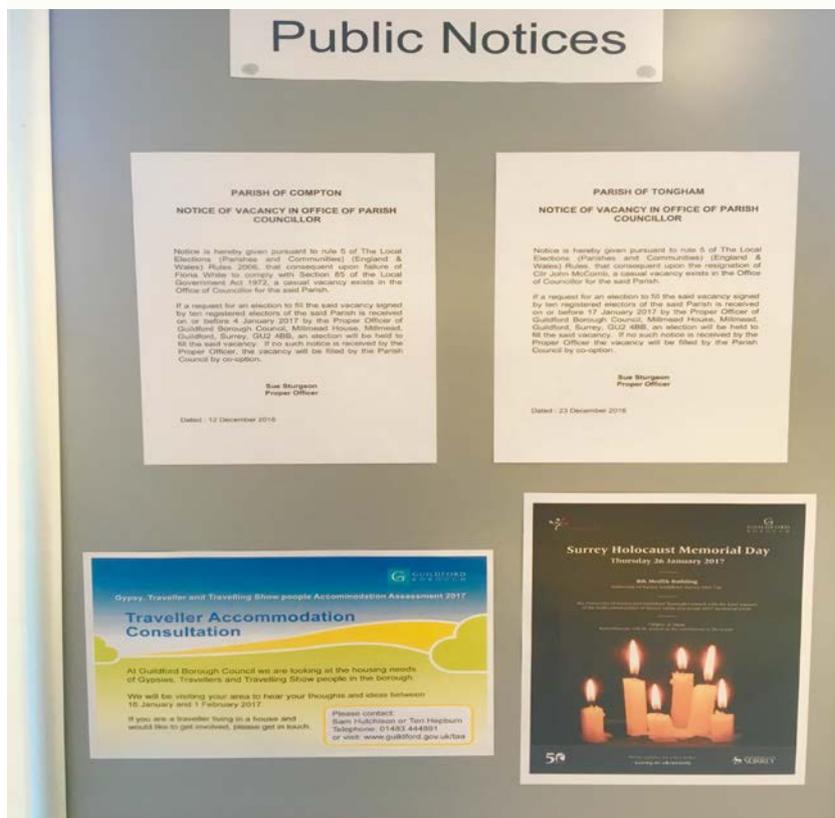
Traveller Accommodation Consultation

At Guildford Borough Council we are looking at the housing needs of Gypsies, Travellers and Travelling Show people in the borough.

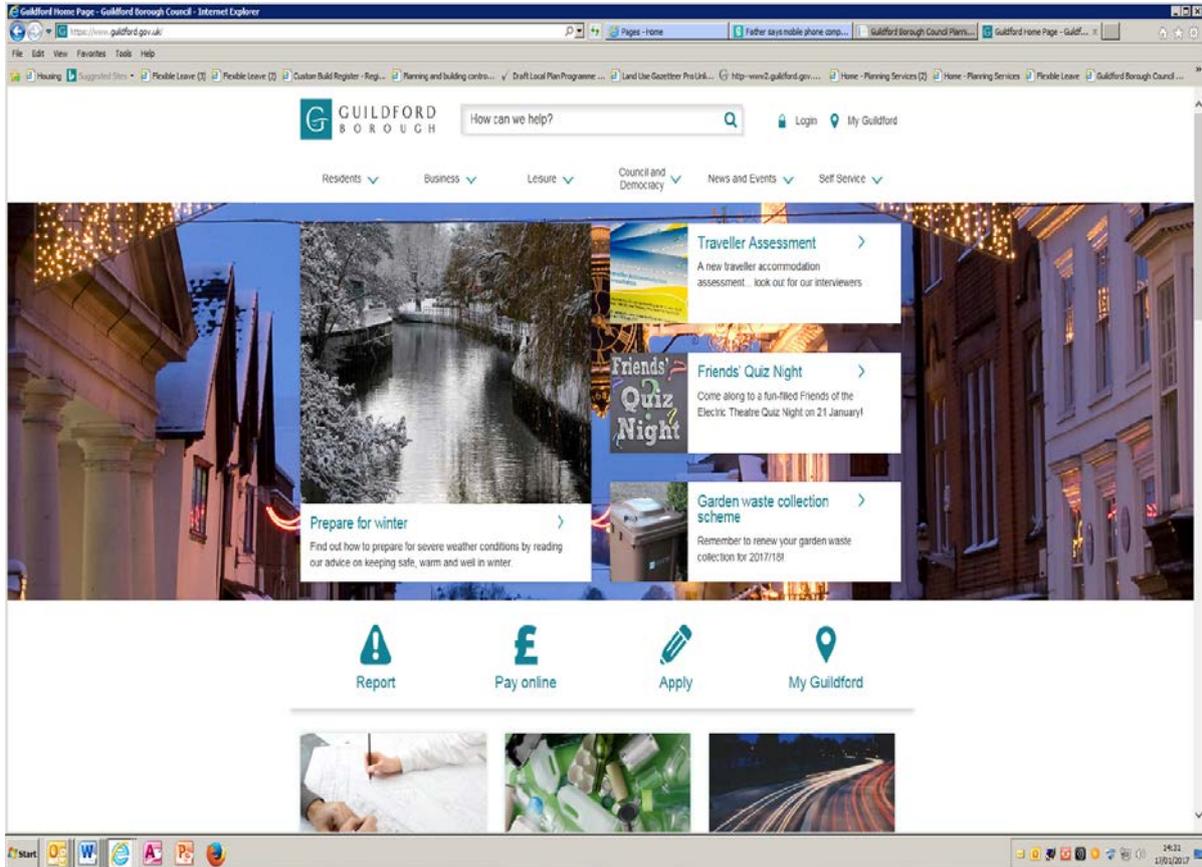
We will be visiting your area to hear your thoughts and ideas between 16 January and 1 February 2017.

If you are a traveller living in a house and would like to get involved, please get in touch.

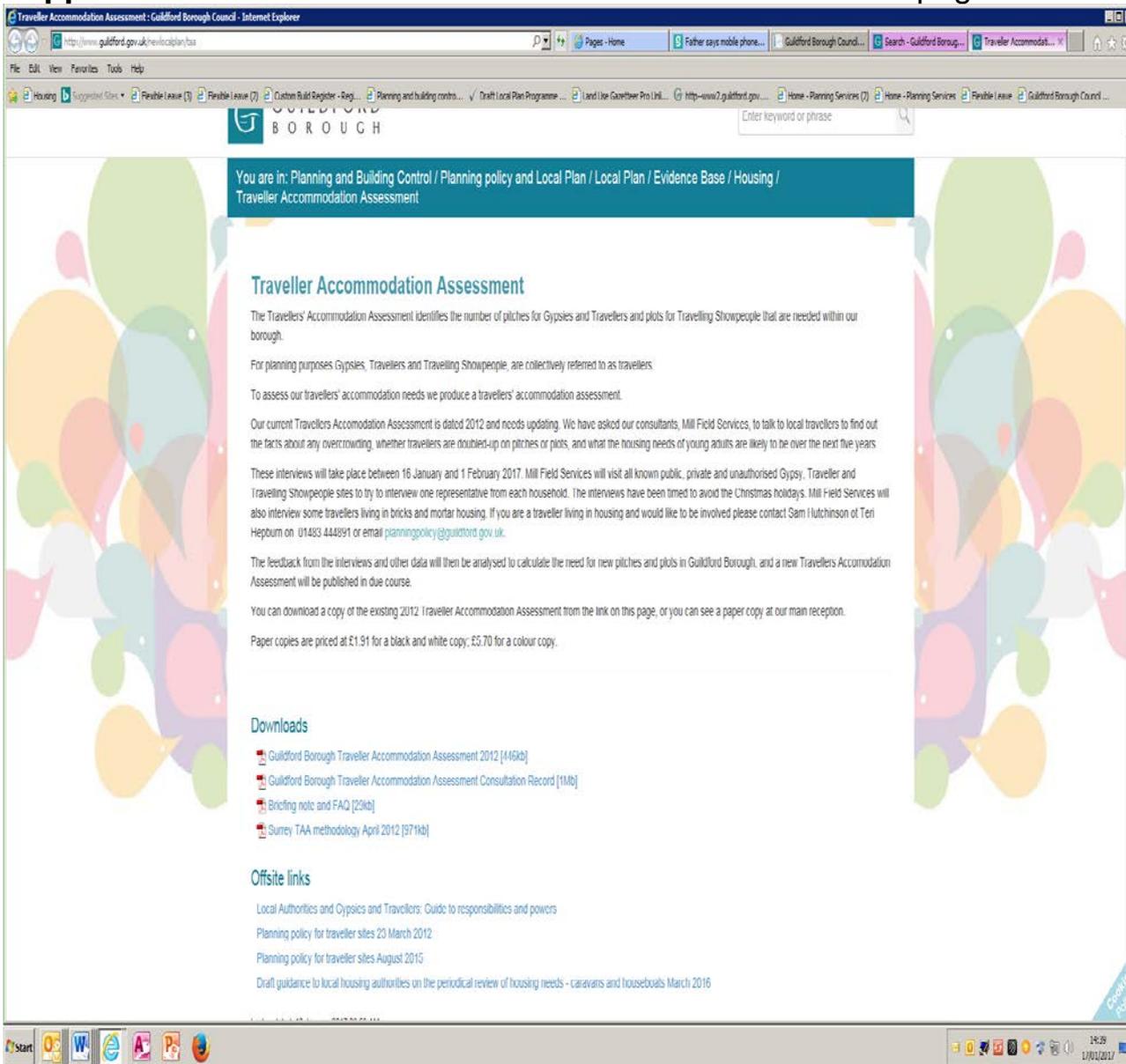
Please contact:
Sam Hutchison or Teri Hepburn
Telephone: 01483 444891
or visit: www.guildford.gov.uk/taa



Appendix 7 Homepage of Guildford Borough Council website, publicising the TAA interviews January 2017.



Appendix 8 The Traveller Accommodation Assessment webpage



Appendix nine - Guildford Borough Councils planning twitter webpage

Appendix 9 Feedback received on the draft Gypsy, Traveller and Travelling Showpeople Accommodation needs updated questionnaire 2017.

Please note that where issues were raised with regards to specific questions these were based on the draft questionnaire that was circulated for consultation. Having considered the responses to the consultation, the questionnaire and some questions have been amended, deleted or added.

Respondant	Comments	Response/action
<p>Rosie Sterry</p> <p>Principal Policy Development Officer, Reigate and Banstead</p>	<p>I have the following suggestions:</p> <p>Qu 16 – could be useful to understand how far they usually travel for work, commuting does not count as travelling so this could add some more context for working practices</p> <p>Qu 21 – might want to query for what purpose they plan to travel in the future given case law has demonstrated there are certain limitations on what uses will enable definition as a traveller.</p> <p><i>For reference:</i></p> <p><i>Page 90 of R & B GTAA:</i></p> <p>Definition of Travelling</p> <p>One of the most important questions that GTAAs will need to address in terms of applying the new definition is <i>what constitutes travelling?</i> This has been determined through case law that has tested the meaning of the term '<i>nomadic</i>'.</p> <p>R v South Hams District Council (1994) – defined Gypsies as "<i>persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)</i>" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.</p> <p>In Maidstone BC v Secretary of State for the Environment and Dunn (2006), it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.</p> <p>In Greenwich LBC v Powell (1989), Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life <i>only seasonally</i>.</p> <p>The definition was widened further by the decision in R v Shropshire CC ex p Bungay (1990). The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently</p>	<p>In response to these comments, we have included a footnote linked to question 16 which sets out our interpretation of what constitutes a traveller taking into account the Government definition in Planning Policy for Traveller Sites August 2015.</p> <p>Question 21 has also been updated to reflect your suggestion, with options included for what people intend to travel for in the future</p> <p>(Work, Fairs for work, Holiday, Visiting friends/family, Other).</p>

	<p>approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.</p> <p>That point was revisited in the case of <i>Hearne v National Assembly for Wales (1999)</i>, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.</p> <p>It is our understanding that the implication of these rulings in terms of applying the new definition is that it will include those who travel but also have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will in our view not cover those who commute to work daily from a permanent place of residence.</p> <p>It will also be the case in our view that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the new definition.</p>	
Ernest Amoako, Planning, Woking Borough Council	Many thanks for the opportunity to comment on your questionnaire. On this occasion, I have nothing further to add.	Noted.
Helen Murch Planning Policy and Design Team Leader	<p>I note that you have asked a number of questions about travelling status. Give that the change to the Traveller definition happened over a year ago and a number of authorities have carried out assessments since then taking into account the revised definition, will travellers be prepared to participate if they feel their answers could lead to them losing their travelling status and right to a pitch on an existing traveller site?</p> <p>Even if they did participate, would they become concerned about the travelling questions with non response or fudged answers given. I have included below an extract from a 2016 article in the Traveller Times warning Travellers to be on their guard. http://travellerstimes.org.uk/News/New-gypsy-status-definition-begins-to-bite.aspx</p> <p>Alison Heine has an important message to tell Gypsies and Travellers in Essex and Bucks being asked to fill in forms containing questions about 'travelling'.</p>	<p>Bearing in mind the recent Government definition of traveller, we feel the questionnaire needs to reflect this. We fully appreciate that many travellers are apprehensive about the new definition of traveller and they may choose not to answer these questions.</p> <p>We understand that other Local Authorities have recently had a low interview response rate. We have tried to address this by using the same interviewers used for the TAA in 2012; our travelling community are familiar with the two interviewers and we hope to build upon this relationship. Also we will raise awareness of the interviews beforehand and publicise.</p> <p>In response to these comments, we have included a footnote linked to question 16, which sets out our interpretation of what constitutes a traveller taking into account the Government</p>

	<p>“You do not have to answer these questions. You do not have to assist local authorities with their need assessments. If your Council want to check if you still meet the definition of a Gypsy –Traveller they should not do so on the back of a need assessment.”</p> <p>“If you are asked questions about what travelling you do and are unclear and confused-do not answer them and get advice. Ask the interviewers to make an appointment and return when there is someone there who can help explain the questions to you. “Think carefully and honestly about your answers. Most importantly of all, never feel pressured into giving answers to questions you are not sure about because there could be serious consequences if the Council decides your occupation of a pitch on a Gypsy-Traveller site is in breach of an occupancy condition which states that only persons who meet the planning definition in Government guidance can live there.”</p> <p>Filling in the forms without advice could also be damaging to their children’s prospects, she added. “Think about your children. Many only know a settled existence. Many have never lived on the road like their parents or Grand-parents did. Most will not have led a nomadic way of life. If they do not go travelling for work with their family they will not have Gypsy-Traveller status for planning purposes when they want to set up on their own.”</p> <p>How should a local authority respond if the number of responses was very low, or likely to be inaccurate? Would it be appropriate to base a policy on a very small sample, and potentially inaccurate assessment of Traveller Need? Could this undermine the robustness of the LP evidence base?</p> <p>Are there other ways of determining a traveller’s travelling status? It might be useful to ensure that the travellers and the local authority understandings of what constitutes a household are synchronised. Perhaps it would be useful for an interviewer to set this out in the interview so that we are comparing ‘apples with apples’.</p>	<p>definition in Planning Policy for Traveller Sites August 2015.</p> <p>We think in this instance the questions within the questionnaire (as updated) are the most appropriate approach for establishing a persons travelling status.</p> <p>Question 21 has also been updated with options included to help clarify a persons intended future reasons for travelling.</p> <p>In response to your comments, under question 2 we have inserted a definition of household: Household means person or people (not necessarily related) living at the same address in one or more mobile homes or caravans and sharing one or more meals a day and housekeeping costs.</p>
Suzanne Parkes BSc (Hons),	You will be aware that Elmbridge undertook a new Accommodation Assessment earlier this year and shared a joint-methodology / questionnaire with Reigate &	Comments noted.

<p>MSc, MRTPI, RICS, Dip CMI</p> <p>Deputy Planning Policy Manager (Strategy & Policy)</p>	<p>Banstead Borough Council and Tandridge District Council. As such, I have compared the two questionnaires and used this as the basis to provide comments.</p> <p>In terms of the draft questionnaire for Guildford, it is considered that the questions regarding travelling patterns are necessary to establish whether someone meets the new planning definition of a Traveller as set out in the Government’s Planning Policy for Traveller Sites (August 2015). In regards to these questions, I would query however whether it would be useful to establish whether someone has ever travelled? Some indication could be ascertained from Question 19 however, this asks whether they travelled <u>more</u> in the past. If they answer ‘no’ this would just provide an indication that their travelling patterns hadn’t changed, not whether they have ever travelled.</p> <p>Lastly, after question Q.21 it might be worth asking when and for what purpose people intend to travel in the future. This would help to establish whether they intend to travel for work etc., as opposed to just visiting friends/family which would mean they wouldn’t met the new definition.</p>	<p>Draft questionnaire question 19 has been updated to ask whether the person or their partner has ever travelled.</p> <p>Question 21 has also been updated to reflect your suggestion, with options included for what people intend to travel for in the future (Work, Fairs for work, Holiday, Visiting friends/family, Other).</p>
<p>Emma Nuttall</p> <p>Advice and Policy Manager</p> <p>Friends, Families and Travellers</p>	<p>Thanks for sending us the questionnaire.</p> <p>We, along with many other organisations including the EHRC, are deeply concerned about the new planning definition, and believe it is discriminatory and therefore may be over turned by way of legal challenge. Consequently we don’t feel that any needs assessments should be using this definition and asking those questions about travelling, as if the definition is successfully challenged the needs assessment will be unsound.</p>	<p>Comments noted and concerns registered. The Council aims to keep abreast of the findings of any legal challenges to the definition of traveller. However, at present we must take current government guidance and definitions into account when undertaking this traveller accommodation needs assessment.</p>
<p>Helen Blogg, Tandridge District Council</p>	<p>Thank you for your email. I would comment that the questionnaire appears to be generally compatible with the questionnaire we used for our GTAA and there are no obvious discrepancies.</p>	<p>Comments noted.</p>
<p>Mr & Mrs Gregory, Whittles Drive</p>	<p>Verbal feedback in GBC office – Happy with questionnaire. Thought the ethnicity breakdown was good. Pleased that interviewers asking the questions and completing/noting travellers responses on the questionnaire.</p>	<p>Welcome the positive feedback.</p>

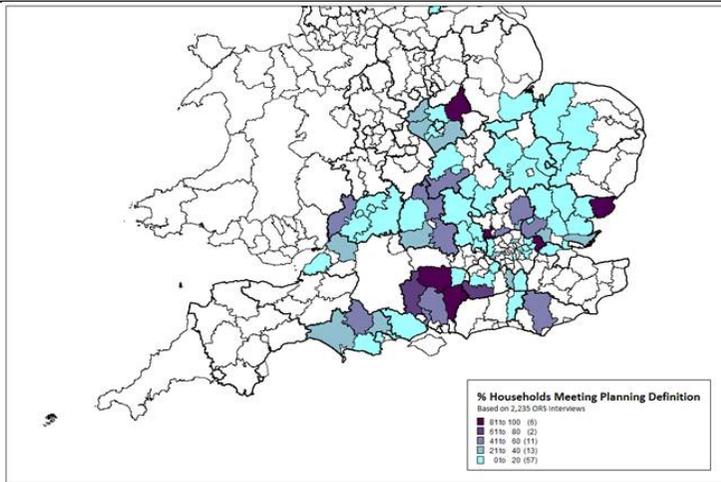
Appendix 10 Feedback received on the draft Guildford borough Traveller Accommodation Assessment 2017.

Respondant	Comments	Response/action
Helen Blogg Tandridge District Council	Many thanks for forwarding us a copy of your draft TAA, and having looked through the report I can advise that we do not have any comments to make regarding the results of Guildford's GTAA or the approach or methodology taken, which appears to be consistent with Tandridge's recently finalised GTAA dated January 2017. We do however reserve the right to make further comments in the future.	Comments noted.
Ray Smith Ethics Committee Showman's Guild of Great Britain	<p>I congratulate Guildford on an excellent report and I will certainly pass on your thanks to the Showpeople at Normandy who I am sure enjoyed the opportunity to meet the interviewing team.</p> <p>I will just make the point we discussed that the definition of Showpeople that is in Government Policy is in our view difficult for showpeople to respond to and therefore a number of our members say they are no longer travelling purely because they do not take their full travelling accommodation with them as they operate smaller rides, games and food units.</p> <p>Our understanding from when we met with DCLG when the policy was still in draft was that those still working at fairs would be considered as travelling. However we appreciate that you have recognised their needs in your survey and accounted for them, therefore this does not impact on our support for this report.</p>	We have taken the Travelling Showpeoples (TSP) interview responses at face value on whether they still travel or intend to travel in the future. However, as Mr Smith acknowledges, we have also allowed for additional plots for TSP if they don't meet the PPTS planning definition of 'traveller'.
Lesley Underwood	<p>Thanks for sending this to me. I am no longer a member of the Surrey gypsy traveller community forum so am not in a position to make any comments.</p> <p>I suggest that you email them directly to see if they would like to comment.</p>	Comments noted. Email also sent to other GT contacts.
Suzanne Parkes BSc (Hons), MSc, MRTPI, RICS, Dip CMI Deputy Planning Policy	<p>I have reviewed the draft TAA and have the following comments, which are officer-level views on behalf of Elmbridge BC.</p> <p>The draft TAA appears to follow a similar approach taken by Elmbridge BC when seeking to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople residing in / resorting to our Borough. The methodology as set out in para. 2.10 – 2.16 seems to be pragmatic in that it draws on recent policy changes, best practice and case law. Elmbridge BC has previously commented on the questionnaire and, in particular, how to assess whether someone is a traveller in accordance with the new definition -</p>	<p>Comments welcomed.</p> <p>The Council do not ask for details of travelling status when people request to go on the Site Waiting List, and travelling status does not at present carry any weight when allocating public pitches. To be eligible to go on the site waiting list you do need a</p>

<p>Manager (Strategy & Policy)</p>	<p>Planning Policy for Traveller Sites (PPTS) (August 2015). Our suggested amendments to the questionnaire (questions 19 and 21) are therefore particularly welcomed.</p> <p>In terms of the number of interviews conducted, Guildford Borough Council has done extremely well in gaining such a high level of responses and should find that this provides the basis for a robust and credible assessment. Focusing on the findings, I note that the draft TAA does analyse the needs of "unknown" households as far as is realistically possible and that it also contains an assessment of the needs of those who do not meet the travelling requirements of the 2015 PPTS. At first glance the level of need identified (for those meeting the definition) does appear low, particularly given the number of Traveller households within the Borough. However, given the justification set out in paragraph 1.7 re: changes to the definition, recent provision, and lower family formation rates as evidenced, the level of need identified does not seem unreasonable. On that basis, it would appear that the draft TAA provides a pragmatic assessment of needs during the Local Plan period, based on the evidence which is available.</p> <p>Finally, in terms of the TAA I can confirm that the current Elmbridge position as set out in paragraphs 3.18 to 3.22 is correct.</p> <p>On matters of detail, Elmbridge BC would be interested to know whether those seeking to join the site waiting list are asked as to their travelling status and whether any update has been undertaken regarding the travelling status of those currently on the list? If so, is any weight given to those who meet the definition? This is more to ensure consistency with our site waiting list which is held and managed by Surrey County Council.</p> <p>In terms of meeting identified needs, Elmbridge BC is mindful that sites where identified by Guildford Borough Council in its latest draft Local Plan to meet a much higher level of need. Elmbridge BC would therefore welcome discussions as to the Council's intended approach re: any potential surpluses identified.</p>	<p>family or work connection to Guildford borough. We acknowledge that the Site Waiting List needs updating as many households have now secured accommodation or moved away.</p> <p>Within the emerging Local Plan we have identified sufficient permanent pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople who meet the definition of a traveller set out in Planning Policy for Traveller Sites. However, we also seek to meet the needs of travellers who do not meet the planning definition, and also make provision for permanent pitches to meet potential additional need of households of unknown planning status. We have built in flexibility to meet any future arising needs through the requirement to provide pitches or plots on development sites of over 500 homes whilst there remains an identified need.</p> <p>It is also worth noting that not all the homes within strategic development sites will be delivered within the Local Plan period, therefore not triggering the not triggering the thresholds requiring the provision of pitches or plots if a need remains.</p>
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<p>Susan Morris Effingham Parish Council</p>	<p>Thank you for sending me this – what a truly heroic piece of work! I have read it as carefully as I can and marked it up on the attachment. A lot of it is pernickety stuff just designed to help your meaning come across more clearly, but there are one or two things that might be helpful as to the main point of it all. Well done to all involved.</p> <p>From an Effingham-based perspective, I would be very much in favour of explicitly stating that the Home Farm pitches are designated for answering the needs of established Home Farm residents, and it makes me anxious that it is not.</p> <p>I have not commented on the questionnaires etc in the Appendices, since these are as used and therefore the text is already fixed. If there is anything I have suggested which you don't understand, please do not hesitate etc.</p>	<p>Welcome the comments and appreciate the time taken to respond so thoroughly. We have updated the draft TAA accordingly where appropriate.</p>
<p>Rosie Sterry Principal Policy Development Officer, Reigate and Banstead.</p>	<p>Apologies for the late reply and thank you for the opportunity to comment on the draft version of the Traveller Accommodation Assessment for Guildford. Having reviewed the draft report we have no comments to make at this time.</p>	<p>Comments noted.</p>
<p>Mark McEvoy Senior Planning Officer, Planning Policy Team Waverley Borough Council</p>	<p>Thank you for sending this through. I have circulated it to a wider group of peers and haven't had any comments back yet.</p> <p>We are still awaiting our own draft TAA to be sent through from ORS. So we are limited to what we can say at this stage and won't be able to give you a formal response as such. From our point of view the things we are interested in is 1. consistency of approach, i.e. methodology, and 2. If there is any reference to unmet need.</p> <p>One thing we did note was that your draft TAA seems to have a much different composition of pitches meeting and not meeting the PPTS definition. This raised a question in my head of consistency of methodology.</p> <p>Guildford identified a very small need for those meeting the definition in the PPTS but a much higher need if you include those who don't meet the definition. By comparison we have identified a more significant need for pitches for those meeting the PPTS definition and a smaller need for those not meeting the definition. Such a contrast in findings would suggest their methodology is different to ours. See below.</p>	<p>Comments welcomed. One reason that we may have a higher level of demand for households not meeting the PPTS definition is that a large proportion of demand came from settled households living in bricks and mortar housing.</p> <p>With the assistance of consultants ORS we carefully assessed the questionnaire responses to identify which households met the planning definition of traveller. The questionnaire clearly asks about travelling habits and whether a person has ceased to travel temporarily or intends to travel in the future.</p>

	Draft TAA Guildford figure	Pre draft TAA Waverley Figure (indicative)	
Gypsies and Travellers as defined by Planning Policy for Traveller Sites (PPTS)	4 pitches	28 pitches	<p>Within our emerging Local Plan we identify sufficient permanent pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople who meet the definition of a traveller set out in Planning Policy for Traveller Sites. However, we also seek to meet the needs of travellers who do not meet the planning definition, and also make provision for permanent pitches to meet potential additional need of households of unknown planning status.</p> <p>When looking at the indicative figures for Waverley and comparing them to Guildfords figures it is also worth noting that since 2012 we have granted planning permission for 24 pitches which has helped address the accommodation needs of travellers; there are also 6 pitches being built at Effingham which are taking into account in the calculations.</p>
Gypsies and Travellers who do not meet the PPTS definition	41 pitches	10 pitches	
Potential additional need of households of unknown planning status	8 pitches	24 pitches	
Travelling Showpeople as defined by PPTS	4 plots	TBC	
Travelling Showpeople who do not meet the PPTS definition	4 plots	TBC	
<p>Having asked Steve Jarman his thoughts, he reassures me that the survey questions asked and the approach to applying the definition were the same. I am aware Guildford engaged ORS, and Steve, to assist them with parts of their GTAA. Whilst the breakdown between households that do and don't meet the definition is quite different in Waverley, it is very similar to neighbouring authorities in Hampshire - all of which also have a higher proportion of households that meet the planning definition. See map below. Together with Waverley all of these areas are characterised as having predominantly small private family sites and this may be a factor in the higher figures.</p>			



These would be my initial comments.

Emma Nuttall
Advice and
Policy
Manager

Friends
Families and
Travellers

Thanks for sending us the draft assessment.

Our comments are:

We understand that there are 90 families on the waiting list for pitches in Guildford (apparently this was said by council staff member Samantha Hutchinson a few weeks ago).

And that this year alone there have been at least 25 different Gypsy families living on the side of the road in the Guildford area.

Comments noted. There are currently 28 households on the site waiting list. To be eligible to go on the site waiting list you do need a family or work connection to Guildford borough. The waiting list needs updating as many households have now secured accommodation or moved away. The Community Development Manager who manages the public pitch waiting list estimates that there are 14 households living within Guildford borough that still require a pitch (at the time of application 11 lived in bricks-and-mortar housing and 3 were doubled up on pitches) and up to 5 additional households from outside the borough are seeking a pitch in Guildford borough.

		<p>At the time of the assessment the Council was not aware of any current unauthorised encampments within the borough. A long-standing tolerated unauthorised Gypsy and Traveller encampment is accounted for in the numbers. One Romany Gypsy household interviewed over the telephone stated they have no settled base and they were on an unauthorised encampment and stay either on the roadside or with friends and family (they did not indicate if they were doubled-up or where their encampment was). This household is on the site waiting list for a local authority pitch and they identified a need for a pitch and were included within the calculations. Five households on unauthorised development sites were also included within the calculations.</p>
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