**SGTCF**

**SURREY GYPSY TRAVELLER COMMUNITIES FORUM**

(Founded 1996)



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 02/10/2016

Planning Policy Team,

Planning Services,

Waverley Borough Council,

The Burys,

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GU7 1HR

Dear Planning Policy Team,

**Waverley Borough Pre-Submission Local Plan Part 1: Strategic Policies and Sites**

Thank you for giving the Surrey Gypsy Traveller Communities Forum (SGTCF) the opportunity to comment on the above Plan. There is a pressing need to meet the accommodation requirements for Gypsies and Travellers within the Borough. The Forum is extremely concerned about the inadequacy of reference to the needs of Gypsies and Travellers and the lack of strategic policy and commitment to deliver an adequate supply of sites within the Local Plan period.

 The document states that ‘There is a relatively large and long-standing gypsy and traveller community in Waverley.’ (Section 2) para 2.6. Given this fact, we would expect much more attention to be given to Gypsies and Travellers throughout the document and reference to their needs should form an important thread from the Borough’s vision through to eventual site allocation. This is fundamental to sound planning.

The SGTCF would like to submit the following comments in response to Pre-Submission Local Plan Part 1: Strategic Policies and Sites

CHAPTER 2: The Spatial Portrait

The spatial portrait makes reference to Gypsies and Travellers at para 2.6, but fails to make any further reference with regards to their accommodation. Paragraphs 2.27 and 2.28 address housing generally and affordable housing specifically. Given that there is reference to the Strategic Housing Market Assessment (SHMA), It is considered that there should also be reference to the Traveller Accommodation Assessment and its findings. Whilst the number of pitches needed may be significantly lower than housing generally, sites are notoriously difficult to find and, more often than not, fail to be delivered.

Issues and Challenges

Para 2.42-Housing fails to make any reference to the fact that providing sites for Gypsies and Travellers is either an issue or a challenge. Evidence shows that it is clearly both. This is a serious omission.

Para 2.42-Social Inclusion makes reference to deprivation, remoteness, and lack of access to a car, yet it makes no reference to social inclusion between the settled community and Gypsies and Travellers. The SGCCF considers this to be an extremely important matter.

CHAPTER 3: Spatial vision

Para 3.2- Point 7 makes a commitment to the provision of a range of housing in accordance with the SHMA, yet there is no mention at all of the TAA and the need to provide accommodation for Gypsies and Travellers. This needs to be addressed.

CHAPTER 4. The Local Plan Objectives

Para 4.1-Point 2 makes reference to the objective of providing ‘at least 9,861 additional homes in Waverley in the period 2013 to 2032. It is considered that there should be a similar objective included with regards to the provision of Gypsy and Traveller pitches in accordance with the TAA. Such provision must be a key objective of the Local Plan.

Para 4.1- Point 12 makes reference to the need to support the accommodation needs of specific groups but omits to make any reference to Gypsies and Travellers. Reference should be added.

CHAPTER 5. Spatial Strategy

National Policy Context- Para 5.7. Whilst reference is made to the NPPF, there should also be reference to National planning policy for traveller sites which needs to be read in conjunction with the NPPF. This will demonstrate that the presumption in favour of sustainable development is equally as relevant to Gypsy sites as it is with all other development proposed within the Borough. The positive approach that the Council is committing to take to sustainable development proposals, and the commitment to work pro-actively should apply across the board so that proposals for new sites and pitches can be approved wherever possible.

CHAPTER 9. Affordable Housing and Other Housing Needs

Rural Exception Sites

Para 9.21-9.23 and policy AHN2 relate to rural exception sites. The SGTCF considers that reference should also be made to the provision of Gypsy and Traveller sites within this policy as set out in Policy D of the National planning policy for traveller sites.

Gypsies, Travellers and Travelling Showpeople

Paragraphs 9.45-9.47 provide background and policy context to the accommodation needs of Gypsies, Travellers and Travelling Showpeople. Para 9.45 states, ‘The Government’s Planning Policy for Traveller Sites (PPTS) requires Councils to set pitch targets for Gypsies & Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. It also requires Councils to identify a five year supply of sites.’ Para 9.7 states that there is a need for 39 pitches between 2017 and 2027.

However, Policy AHN4: Gypsies, Travellers and Travelling Showpeople Accommodation fails to make any reference at all to either pitch targets or to a 5 year supply. Given that Policy ALH1: The Amount and Location of Housing, includes a target for general housing, it is unacceptable and indeed, unequal that a commitment to a target number of pitches has been omitted from this policy.

In addition, the policy AHN4 states;

‘Allocations or proposals for permanent and transit sites for Gypsies, Travellers and Travelling Show people will only be permitted if;

* they are necessary in order to meet the requirements of an appropriate assessment of need;

There is a distinctly different policy approach to the provision of general housing which makes reference to ‘at least’ (meeting the target) whereas pitches will only be permitted if they meet need ie no more than the target. There is a clear distinction between approaches to general housing and Gypsy and Traveller pitches, which demonstrates that the Local Planning Authority is treating different groups unequally. The approach between different communities should be fair and consistent and not discriminatory.

The Forum is also concerned that the delivery of policy AHN4 is vague and lacks commitment. The policy approach to the provision of accommodation for Gypsies and Travellers is considered to be unsound on all counts. It should be reconsidered in its entirety and an approach consistent with that relating to general housing adopted. These matters are of strategic significance and should not be left until Part 2 is prepared (for which there is no timetable currently).

CHAPTER 18. Strategic Sites

Given the lack of any certainty with regards to the delivery of sites, the Local Planning Authority should give consideration to delivering pitches as part of the delivery of Strategic sites. Whilst there should not be an over reliance on delivery through this route, it is a deliverable option where land is scarce and sites for Gypsy and Traveller pitches difficult to find.

Yours sincerely,



Lesley Underwood,

Secretary, Surrey Gypsy Traveller Communities Forum