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## Planning for Gypsy and Traveller Accommodation in the East of England: Issues and Options – Consultation Response Form

- If possible, please submit your response using the online form at [www.eera.gov.uk](http://www.eera.gov.uk) or download this form and email the completed version to [planning@eera.gov.uk](mailto:planning@eera.gov.uk)
- To enter text on this form, click in the grey box and type in your response, save it, and then send the form as an attachment to an email.
- Alternatively, please print the form and complete by hand. If you run out of space, please continue on a separate sheet making it clear which question you are referring to.
- Please return this form by **5.00 pm on Tuesday 31<sup>st</sup> July 2007**

Comments submitted by/on behalf of:	
Title (Mr/Mrs/Miss etc):	
Initials:	
Surname:	
Organisation (if applicable):	
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Post Code:	
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Agent Details (if applicable):	
Primary contact (agent/client):	Agent
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Please tick if you would like to be notified of further Government consultations on RSS policies on accommodation for Gypsy and Traveller Communities in the East of England?

Please return this form by 5.00 pm on Tuesday 31st July 2007 to: [planning@eera.gov.uk](mailto:planning@eera.gov.uk) or by post to

Planning and Housing, East of England Regional Assembly, Flempton House, Flempton, Bury St Edmunds, Suffolk IP28 6EG

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## A - THE APPROPRIATE SCALE OF PITCH PROVISION ACROSS THE REGION

1) Do you think 1,220 net additional residential pitches is a reasonable estimate of the level of unmet need for residential pitch provision taking into account how this may change over the period until 2011?

No. The consultation document does not inform sufficiently for anyone to meaningfully answer this question. It does not show the basis upon which unmet need has been calculated, nor does it define what is meant by "need" at all. With such scant factual or evidential material provided, the question is impossible to answer.

Further, it is quite simply undemocratic and unfair to say that such an assessment of pitch provision has been made by "the experts" at a university, without a clear and detailed account of how the experts' conclusions have been reached, or without information which could be used to challenge those conclusions.

2) If you think 1,220 net additional residential pitches is not a reasonable estimate of need what alternative level do you would think is a more reasonable estimate of need at 2011? Please make clear why.

This question is cynical in the extreme. EERA has not revealed the basis upon which the figure of 1220 has been credibly reached. This question now effectively states: well if you do not accept our figure, tell us your figure and how you have reached it: the implication being that if members of the public do not satisfy EERA that their own suggested figures have been reached through proper research, then EERA will prefer its own figure, believing it to have been properly researched. It can only conceivably be fair to ask this question to members of the public, or anybody at that matter, if EERA is prepared to provide the same resources to each person asked as has been provided to generate the university study. Assuming that members of the public simply do not have at their disposal the same resources which have been provided to other bodies informing EERA, how can this question be fair?

Please also refer to the answer to question (1) above.

3) On the basis of information currently available is it helpful if the RSS revision seeks to establish policy on the level of need for transit pitches? And, if so, would it be more helpful to distinguish this provision from the need for residential pitch provision in policy?

The provision of more information is always likely to be more helpful, and information as to the type of accommodation contemplated is no exception. Moreover, given the nature of the purported consultation, the implied suggestion that transit accommodation may not need to be considered comes as a very great surprise. Why is valuable space on a

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document which purports to be consultation on Gypsy and Traveller accommodation being used to ask the question: do you think we need to consider the type of accommodation upon which the ethnicity of the subject community is essentially derived? Of course transit accommodation must be considered - and separately identified!

It is the author's considered view that transit pitches are a must, and not, in fact, residential pitches. Those that live on current residential pitches do not actually integrate with the rest of the community. The old are segregated and deprived of the opportunity of mixing with others of their age. The middle-aged tend to have private dwellings, and the young tend to form gangs and, sadly, become very menacing. As with all ethnic minorities, travellers who are not transient should be allowed and encouraged to integrate with the rest of the community. Other ethnic groups either go on the housing list and in time are offered accommodation, or they purchase their own properties. Those that wish to continue their "nomadic life style" can only be properly assisted through the provision of properly managed transit pitches/sites.

4) Should this revision seek to establish policy on the level of pitch provision beyond 2011? If so, what assumptions should be used to do this and until what year should they be applied?

Please refer to the answers to questions (1) and (2) above. The consultation simply does not furnish the community who are being asked the questions with sufficient information, evidence or resources to provide a response which is likely to be accepted by EERA as being an informed response. This is another example of a cynical question which purports to elicit an informed response without providing the necessary detail or resources for that response, in fact, to be informed.

It is the author's opinion that any attempt to establish policy beyond 2011 is unwise. As already indicated, there needs to be a rethink on the number of transit pitches and not residential, and then (assuming this can be achieved promptly) the situation should be reviewed. If at the time of review it appears that the travellers arriving at the transit sites become static, then provision should be made to house these people, as is achieved for other ethnic minority groups.

## **B – DISTRIBUTION OF PROVISION**

5) To what extent is it reasonable to seek to spread the distribution of pitches from the council areas where need is calculated to arise? Will a more dispersed distribution still meet the needs of Gypsies and Travellers? Would a different

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pattern of dispersal seeking to redistribute provision from areas of greatest need into nearby council areas be more appropriate than option 2?

This question is unfairly weighted towards a response in favour of EERA's current distribution proposal. Please refer to the answers given above in respect of the inadequacy of the consultation document and its failure to provide sufficient information upon which to properly inform on dispersal and distribution. It is simply not understood how "need" has been calculated, whether currently or prospectively; nor is it understood how needs have been evaluated, nor how areas of "greatest need" have been identified. Why is the public not being engaged on the assessment of these fundamental issues? Essentially, and again cynically, the question effectively asks: assuming we are correct in where we have identified greatest need, do you think we should allocate on this basis? It is not accepted that EERA has correctly identified areas of greatest need.

It is the author's opinion that it is not reasonable to provide more pitches where need has been calculated to arise. The focus of attention should be on integration through housing for those who wish to live on a static residential site. Static residential sites are little more than ghettos and do nothing for integration. Where there is a genuine fear of housing, transit sites should be provided.

6) Is it reasonable to accept the principle that each local council area should seek to provide at least one additional site?

No - it simply has no scientific basis. For reasons above, however, it is thought appropriate to provide at least one transit site per quadrant of each county, with 15 pitches, a large wash and toilet area, a large car park for lorries trucks cars and traps, and a secure field with water for horses. Demand and movement etc. can then be reviewed later.

7) In the light of the above consideration of locational issues, is there any evidence to suggest that any council area within the East of England could not make provision for a level of pitches in the order of that shown in the two illustrative options without having an adverse impact on areas of recognised environmental importance? Are there any other environmental or policy constraints that may be so significant to influence the distribution of pitches

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### between council areas?

The above "consideration of locational issues" is hardly comprehensive, and any answer based solely upon it would be unreliable. Moreover, and largely for reasons already expressed in answers given above, this question is inappropriately and improperly raised. The consultaion document has failed to provide the evidence purported to be sought. The question now cynically asks: what evidence have you got? The resources point expressed above is repeated here.

Further, the question is very ambiguous, employing as it does double and triple negatives within one sentence. It is for EERA to provide details, and an account, of areas of environmental importance and other environmental or policy constraints which may influence (not "which may be so significant to influence") pitch distribution. Then those consulted could comment on the significance of each in their lives. Has any proper consideration been given to how either a "yes" or "no" answer to this question meaningfully affects the consultation exercise? It is the author's opinion that this question is the quintessential example of a nonsense question whose answer, either way, can be of little or no assistance. Why has EERA's consultation simply failed to adopt a genuinely meaningful approach to asking how the residential community could accommodate a perceived need? Why has information about local characteristics not been considered? Why is EERA not interested in asking plain, simple questions seeking to elicit from each community the true impact on their lives of a proposal to increase Gypsy and Traveller accommodation?

## C – DELIVERY AND IMPLEMENTATION ISSUES

### 8) To what extent is it reasonable to rely on the delivery of sites either by Gypsies and Travellers themselves or by the development industry?

Neither is reasonable. G & T sites need to be managed by a statutory body not by themselves or by a private industry.

Query: is it appropriate to consider this issue as part of the Regional Spatial Strategy?

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9) In view of the potential scale of pitch provision needed in the East of England and constraints on public funding available is it reasonable to suggest that most of the need identified is likely to have to be met by provision on 'exception' or other sites that would not normally be granted planning permission for other forms of housing?

Insufficient information has been provided as to the potential scale of pitch provision (see answers given above on the inadequacies of the consultation document).

No information at all is provided on the costings, and the burden on public funding of this, or any, provision. Those questioned are merely expected to accept that there are apparently constraints on public funding, with no explanation of those constraints and no explanation as to why funds are not available centrally.

Why is the question weighted in this way towards a particular answer? Why is EERA so afraid to trust members of the public to provide a considered response through open and un-leading questions?

It is the author's opinion that it simply is not reasonable to meet provision on 'exception' or other sites. EERA has tried through a series of university studies to identify a need for G & T accomidation but has not provided any substantial or significant statistics. It is repeated that if there is a need it must be met through the same housing system as for all settled and ethnic minority populations, and through transit sites for the truly nomadic. Far greater consideration needs to be given to integration, not more segregation. Perhaps through building some affordable housing near sites and encouraging a more settled integrated lifestyle, the problems of ill health, high death rates and poor education can be surmounted. The provision of residential sites on land which could not ordinarily be developed will only result in greater resentment from the settled community owing to a perceived disparity of treatment, and owing, doubtless, to an inappropriate and improper use of green-belt land. This can only exacerbate the feelings of segregation and isolation within the travelling community.

10) In view of the scale of potential need for new sites identified, is there a need to develop new means of developing Gypsy and Traveller sites, such as through the establishment of some form of specialist delivery organisation?

We do not believe EERA has properly identified a potential need. Certainly the consultation document fails to do this. However, if the county and district authorities, including highway authorities, carried out their duty to "manage" existing and unauthorised sites then the need would be markedly reduced and many travellers would seek to integrate into the wider society and follow the housing allocation process as all other members of society.

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Why is another "specialist delivery organisation" being contemplated at all? Is it because the existing system cannot manage what it already is supposed to manage? If so, it may be prudent get that right first before unnecessary and expensive expansion, and use of the already diminishing green-belt, is considered.

#### **D – TRAVELLING SHOWPEOPLE**

11) In the light of the proposed draft Circular is it appropriate for the revision to seek to identify the number of pitches that should be provided in each local council area to meet the needs of Travelling Showpeople separately from those to be provided to meet the needs of Gypsies and Travellers? If so, what evidence is available to inform this and what other issues should be taken into consideration?

This is another example of a question seeking the public to do the job of EERA. EERA has simply failed to provide any evidence to inform the level of need for travelling showpeople. Indeed, it is not clear why the needs of travelling showpeople should be considered in this consultation exercise, but on the assumption that they should, the exercise needs to be undertaken by EERA with much greater analysis and scrutiny of the issues and numbers involved.

The author considers, consistent with other answers provided above, that transit sites only should be provided for travelling showpeople, with more parking for their H.G.V.s & equipment.

#### **GENERAL COMMENTS**

Please use this space to give general comments not covered in the questions above

EERAGoAGAIN Recommend all individual comments are added here.

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