

CRAWLEY BOROUGH COUNCIL

**GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE
ACCOMODATION NEEDS ASSESSMENT**

INTERIM DRAFT DOCUMENT

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EXECUTIVE SUMMARY

- The 2011 Census confirmed that the number of individuals who identify themselves as 'White Gypsy or Irish Traveller' living within Crawley is 77. Currently, four Gypsy and Traveller households reside on two private sites in caravan accommodation. Three Travelling Showpeople households are located within the borough sharing a single site. Notwithstanding this, in Crawley, the majority of the travelling community population is known to be housed within bricks and mortar accommodation. These were the families addressed as part of the Accommodation Needs Assessment survey to understand the ranges of their issues, needs and aspirations.
- The population surveyed are predominately Irish Travellers (69%) with the remaining Romany (31%).
- Initially, there were thirteen completed questionnaires identifying a demand for nine pitches in the borough, all from newly forming households. This indicates that the current housed population are either comfortable, resigned to the situation, or living in bricks and mortar for alternative reasons (such as health problems).
- The demand for pitches was identified through indications of aspirations for their children to live on a pitch; desire to move out of current accommodation, out of preference and not overcrowding; and the anticipated new family formation expected to arise from existing households over the next five years.
- If the identified demand from the initial questionnaire for nine pitches is pro-rata against the identified Gypsy and Traveller population (of approximately 30), then there would be a residential demand for 18 pitches.
- However, a number of further interviews were undertaken with the initial participants to determine whether the identified "demand" for a pitch was a genuine accommodation 'need'. It is believed that none of the participants in bricks and mortar accommodation demonstrated a 'need' in terms of having a proven psychological aversion to bricks and mortar accommodation, although health issues were prevalent in the questionnaire responses.
- Owing to level of participation achieved, the results cannot be taken as conclusive. The monitoring of Gypsy and Travellers accommodation 'needs' will therefore be an ongoing process. In addition, the council will identify a 'reserve' site for the future accommodation 'needs' of the Gypsy and Traveller families of Crawley. A growth rate of 3% has been applied to the number of households currently living within Crawley (both in caravans and bricks and mortar) for the purposes of estimating the potential future need which may arise from the current population. This results in the need to find a reserve site suitable for accommodating up to 9 Traveller pitches.
- None of the surveyed travellers indicated that they owned land they wished to be considered for a traveller site. However, a planning application for two pitches on a private site within the borough is currently being considered by the council, and no decision has yet been made. If the site does not come forward, the council will also have to assess whether the family in question have a genuine 'need' at this stage since the family may not have an authorised site on to which reside.

PART A: ACCOMMODATION NEEDS ASSESSMENT

1. INTRODUCTION

This interim assessment, referred to as the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) assesses the requirement for pitches and plots within the borough and forms part of the evidence base for the Local Plan 2029. The GTAA was conducted by the council's Community Services, Corporate Policy and Planning Departments, in partnership with West Sussex County Council (WSSCC).

The Housing Act 2004 requires Local Authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople (GTTS), including them in their accommodation assessments and outlining how their needs will be met. However, there is not a requirement for Local Authorities to provide the sites themselves.

The National Planning Policy for Traveller Sites (DCLG, 2012) requires Local Planning Authorities (LPAs) to:

- make an assessment of need for the purposes of planning;
- develop fair and effective strategies to meet need through the identification of land for sites;
- promote more private traveller site provision while recognising that there will always be a social need;
- reduce the number of unauthorised developments and encampments, and moreover, make enforcement more effective; and,
- increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.

The Caravan Sites Bill 2012 (Lord Avebury 17th May 2012) is a private members Bill intended to re-introduce the duty on local authorities to provide or to facilitate the provision of adequate sites for travellers residing or resorting in their areas. The Bill received a third reading in the House of Lords (17th December 2012) prior to being assessed in the House of Commons. This Bill will be monitored to determine whether the council's obligations change.

For the purposes of this GTAA (and planning policy more generally), the following definitions¹ will apply:

- **Gypsies and Travellers:** 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'; and,
- **Travelling Showpeople:** 'Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers.

¹ as defined in the National Planning Policy for Traveller Sites (PPTS), DCLG, 2012, Annex 1

For the purpose of this study 'pitch' means a pitch on a 'Gypsy and Traveller' site and refers to residential provision. 'Plot' refers to a pitch on a 'Travelling Showpeople' site (often called a yard) and refers to a mixed-use site suitable for both employment and residential activities.

This assessment seeks to identify accommodation 'need'. In terms of Gypsy and Traveller accommodation, 'need' has been defined by the Government² using the following criteria:

- Caravan dwelling households who have no authorised sites on which to reside;
- Caravan dwelling households whose existing site accommodation is overcrowded or unsuitable and are unable to obtain more larger or suitable accommodation;
- Caravan dwelling households who contain suppressed households who are unable to set up separate family units and are unable to access a place on an authorised site, or obtain or afford land to develop one;
- *Bricks and mortar households whose existing accommodation is overcrowded or 'unsuitable'. Unsuitable in this context can include unsuitability by virtue of proven psychological aversion to bricks and mortar accommodation.*

In producing Local Plans, local planning authorities should identify sites sufficient to meet their locally set target, a target which should address the likely permanent and transit site accommodation needs of travellers within the area, over the first ten years of the Plan period, and where possible, years 11-15. National guidance confirms that Gypsies and Travellers, and their children and other relatives, in bricks and mortar housing may form part of the source which future site need may arise.

By virtue of Crawley's particular GTTS community, and the limited number of authorised sites within the Local Authority's administrative boundary, the community is predominantly housed within bricks and mortar accommodation. In these circumstances, the final criterion in the DCLG guidance used to demonstrate a substantive accommodation 'need' (in italics above) has been the main thrust of this GTAA.

² as set out in the Gypsy and Traveller Accommodation Needs Assessments Guidance, DCLG, 2007, Para 15.

2. METHODOLOGY

This section outlines the methodology used to assess Gypsy and Traveller accommodation needs.

Stage One – Historical Data Collection

In terms of assessing the historical data for Crawley's GTTS population, a number of resources have been used to gain a wider understanding of the community accommodation needs. These were as follows:

- Information on population size and or movements of travellers;
- Homeless presentations of travellers;
- Re-housing data which monitors re-housing of travellers;
- Housing register;
- A review of sites within Crawley;
- Unauthorised traveller sites, encampments and development including information on the number of caravans and family groups on each site, length of occupation and the up to date positions regarding planning applications, appeals and outcomes / or enforcement action;
- Planning application data for the previous five years, including live applications;
- Biannual Gypsy and Traveller caravan counts data for the previous five years; and,
- Data from other organisations on the number of families and individuals (including the 2011 Census).

Stage Two – Initial Traveller Questionnaires

The initial questionnaire (Appendix One) and interview process was tailored to Crawley's circumstances and aimed to maximise the response rate.

The questionnaire utilised methodology discussed between authorities at a Gatwick Diamond, Surrey and Sussex County wide level, adapted to reflect Crawley's specific circumstances and households to be interviewed.

Interviews were led by a trained and experienced Community Liaison Officer at Crawley Borough Council (CBC) who has worked closely with the local community over a long period of time. Where necessary, the council's approach to interviews was flexible to accommodate the wishes of those being interviewed. The questioning focused purely on accommodation need issues to ensure this assessment remains concise and useful to its original purpose. In the case of Travelling Showpeople, who have distinct site requirements, the questionnaire questioned their need for additional storage space for equipment.

To facilitate participation in this assessment, the assessment will remain live and open to additional interview data up to the formal submission of the Local Plan. In addition, the reasons for families refusing questionnaires will also be established through dialogue with WSCC.

Stage Three – Second Traveller Questionnaires

Analysis of the initial questionnaire suggested that more work was required in order to establish whether 'demand' identified in the initial survey represented a 'need' which should be met through site allocations in the Local Plan.

To address this, a further questionnaire (Appendix Two) was produced to decipher whether a genuine 'need' for pitches or plots within Crawley exists. This second questionnaire allowed for a greater degree of qualitative information to be gathered.

Interviews were led once more by a trained and experienced Community Liaison Officer at CBC and the same Planning Officer scribed for all the interviews undertaken to ensure consistency between interviews. The questioning focused on the health issues of the participants and their accommodation needs to ensure that any genuine 'need' for pitches or plots could be established.

Stage Four – Analysis and Presentation of Results

The outputs from stages one, two and three of the assessment are as follows:

- Part A: Accommodation Needs Assessment Data Analysis and Results
 - Demand for sites within Crawley (as concluded from the historic data for unauthorised sites, encampments and incursions along with the information from the initial questionnaire)
 - Need for site provision within Crawley (as concluded from the additional questionnaire, and assumptions into future needs assessment)
- Part B: Meeting Needs
 - Taking forward the conclusions of the Accommodation Needs Assessment

3. DATA ANALYSIS AND RESULTS

The 2011 Census confirmed that there are seventy-seven individuals within Crawley who have identified themselves as 'White Gypsy or Irish Traveller', with the largest concentration of the GTTS community in the Langley Green neighbourhood.

Currently in Crawley, four Gypsy and Traveller households reside on two private sites in caravan accommodation. One of these sites is authorised for two pitches; the other site is currently unauthorised but a planning application for two pitches is currently being considered. The unauthorised site contains two caravans housing members of the same extended family; this could conceivably become three separate households within the life of the Local Plan.

Three Travelling Showperson households reside on an authorised private site (one household within bricks and mortar accommodation, the other two households are currently in caravan accommodation within the same site; these households are members of the same extended family.

Notwithstanding this, in Crawley, the majority of the travelling community population is housed within bricks and mortar accommodation, this is supported by the locational information provided by the Census data. From information provided by West Sussex County Council Communities Commissioning Directorate have suggested that their records indicate an estimated 30 Traveller families reside within Crawley. National guidance confirms that Gypsies and Travellers, and their children and other relatives, in bricks and mortar housing may form part of the source from which future site need may arise.

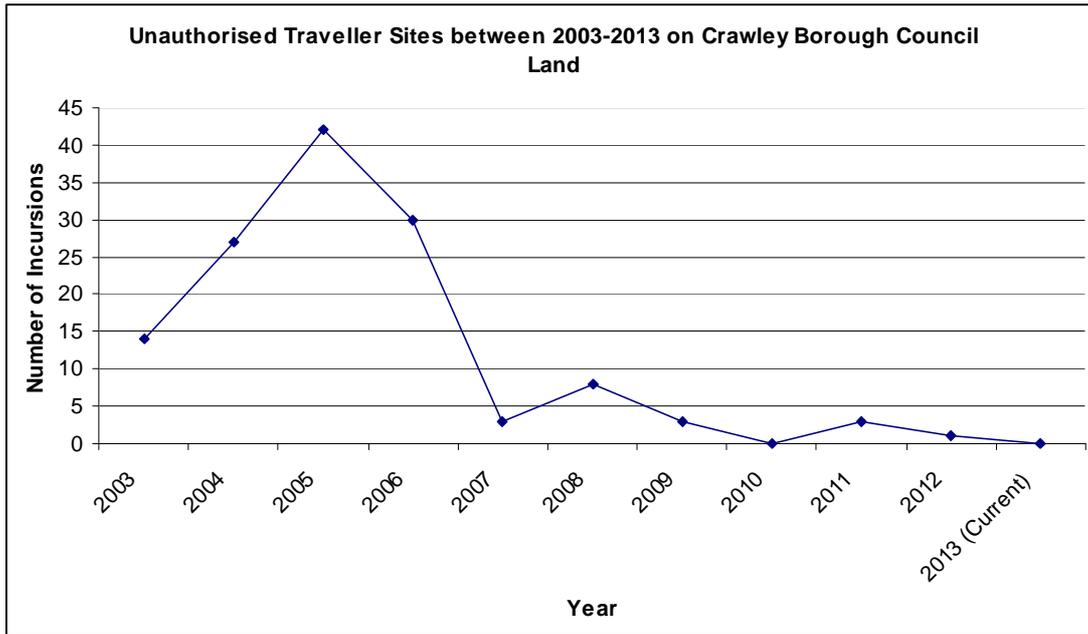
Demand from Unauthorised Traveller Sites and/or Encampments

The number of illegal incursions into the borough can be used to inform the overall demand for Traveller sites³.

As the graph below illustrates (Figure One), the number of incursions onto CBC land reached a peak in 2005, where just over 40 incursions occurred during the year. However, since 2007, the number of unauthorised incursions has significantly lowered, with each year thereafter having fewer than ten incursions (in 2010, there were actually no incursions). It should be noted that the number of incursions onto CBC land does not in itself represent the number of different families residing on unauthorised sites; for example, during the peak period (2004-2006), the incursions were related almost entirely to four families.

³ See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG, Para 62.

Figure One: Incursions onto CBC Land by Travellers, 2003-2013



Anecdotal evidence suggests that a number of actions taken by CBC and WSCC have contributed to the peaks and dips in incursions between 2003 and 2012. These actions include:

- 1) The GTTS community being aware that the council were exploring whether a permanent site could be allocated within the borough in preparation for the now adopted Core Strategy (2008). This might have made Crawley an attractive place to visit prior during 2004 – 6 when this work was being undertaken.
- 2) Since 2006, the council has undertaken a programme of works (in approximately fifty locations) to reinforce its public spaces, making it more difficult to set-up unauthorised sites.
- 3) Between 2006 and 2009, three of the four families who frequented Crawley within the earlier period on unauthorised sites are now accommodated on permanent sites within West Sussex (through WSCC).

Therefore, owing to the security measures undertaken by the council, and moreover, the fact that three out of the four families who resided on unauthorised sites on CBC land have now been adequately accommodated elsewhere in the County, the demand for Gypsy and Traveller sites within the borough has receded through this period.

Records for illegal encampments on private land within the borough are limited. Information only becomes available to the council on an informal basis. However, on at least eight occasions during the period between 2006 and 2013, CBC's Enforcement and Technical Services Manager has been in contact with private landowners in such situations on sites in the Manor Royal Industrial Estate and surrounding Balcombe Road to the north east of the borough.

In addition, a limited number of the GTTS population have contacted the planning department with pre-applications and planning applications in relation to unauthorised sites on privately owned land.

Demand through the Housing Register Process

There have been no 'homeless' residents of the borough requesting a Gypsy and Traveller site through the council's Housing Register process. It should also be noted that there are limitations with the database in terms of 'identifying' such groups of residents; however, it has been confirmed anecdotally by CBCs Housing Options and Housing Needs managers that instances of this kind were extremely rare.

The last large group of Travellers who wished to be accommodated within the borough was in 2005 when travellers settled on land in Dalewood Gardens, Northgate. The council requested for an eviction order owing to its location immediately adjacent to a residential block of flats, which was challenged by the Travellers on the grounds of Article 8 of the Human Rights Act (A Right to a Private and Family Life) and was referred for a Judicial Review in the High Court. Although the Travellers were allowed to reside on the land during the hearing, it was finally ruled in the council's favour that the Travellers should be evicted from the land.

Since it is known by the Travelling community that there is no authorised, publicly owned and maintained site provision within Crawley, and that unauthorised sites are addressed robustly, Travellers do not normally approach the council for assistance.

The Initial 'Demand' Questionnaire Results

From an estimated population of thirty families within Crawley, the following response rate for initial questionnaire was achieved.

Figure Two: Initial Questionnaire Gypsy & Traveller Households Response Rate

	No. of Gypsy and Travellers Households	No. of Travelling Showpeople Households
Full interviews completed	13	0
Partial interviews completed	0	0
Interview refused	15+	0
Property unoccupied	N/A	N/A
No-one available to interview	N/A	N/A
All Gypsy, Traveller and Travelling Showpeople households identified	Approx. 30	3

Seven of those who were interviewed indicated that whilst as the head of household they were satisfactorily housed in bricks and mortar accommodation, there may be other household members likely to want a pitch within the borough in the future.

In total, the initial questionnaire identified a total residential demand for nine Gypsy and Traveller pitches (from the full interviews completed) through new family formations expected to arise from 2012-2017. This would result in a total residential demand for 18 Gypsy and Traveller pitches when this figure is pro-rata against all the households identified (approximately 30).

In addition, the Development Management team have identified that there is one planning application for two Gypsy and Traveller pitches, and a desire (at an informal pre-application stage) for a further Travelling Showpeople plot on an existing site alongside 2 authorised Travelling Showpeople plots.

From the initial questionnaire, 14 pitches have been requested outside the borough, but it is not clear where. Quite often, the preference is for a pitch rather than a house and the location appears secondary.

The Second Questionnaire

Analysis of the initial questionnaire suggested that more work was required in order to establish whether the 'demand' which had been identified in the initial survey represented 'need' which should be met through site allocations in one form or another in the Local Plan.

As a consequence, the council identified seven households, chosen on the basis that they had an aspiration to move onto a GTTS site within the borough (answering question 11 of the initial questionnaire (see Appendix A) accordingly)⁴ and asked them to take part in a follow-up interview. Whilst seven households have confirmed that members of their household would wish to reside on a Gypsy and Traveller site within Crawley, only four were willing to be interviewed⁵.

Results Summary

The four interviews that were undertaken (wholly with residents in bricks and mortar accommodation) revealed a number of issues with respect to the Gypsy and Traveller community in bricks and mortar accommodation. These were as follows:

- 1) Across all four interviews there was a perception that Gypsy and Traveller families find it difficult to 'settle' within their communities. Indeed, one household had stated that it had taken at least twenty years to have fully settled into their community. Reasons for this varied from self exclusion to experiencing suspicion and resentment from neighbours.
- 2) Only one household has immediate family living within the local area. There was also a general feeling by those interviewed that it is difficult for the extended family to stay at their bricks and mortar accommodation.
- 3) A benefit of living in stable bricks and mortar accommodation is that residents are able to access services such as schools and hospitals. Owing to the particular needs of children in two of the four families, and the varying health issues of the participants, this was considered a significant benefit.
- 4) In terms of the health and wellbeing, all four interviews raised different health problems. Mental health issues (such as anxiety and stress) were explicitly mentioned in two interviews. However, this was not considered to be caused by the existing bricks and mortar accommodation being 'unsuitable'⁶.

⁴ The results are occasionally open to interpretation, although unless a specific preference for a Crawley based site was made through question 11, the assumption is that anywhere would suffice.

⁵ In terms of the other three initial participants identified, one household had moved from their address, one household was not willing to be interviewed when approached and the last household was not contactable.

⁶ See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG, Para 15.

- 5) All those that were interviewed discussed the importance of their culture and heritage, and moreover, suggested that living in bricks and mortar accommodation was not necessarily the way they would choose to live. There was also concern for the younger generation within the community, and that the culture could be lost.

Although this was a small sample size, the interviews provided an in-depth snapshot of some of the issues being faced within the GTTS community, including mental health problems. Mental health problems have also separately been discussed for Gypsies and Travellers living in settled housing⁷ within West Sussex as a whole and the Crawley GTAA interviews confirmed that depression and anxiety amongst the participants was common.

Notwithstanding the very real issues which the survey highlighted, the interviews did not identify a specific and immediate 'need' for travelling accommodation when judged against Government guidance. There are instances where there is a concern that cultural traditions may be lost in the next generation, where families are experiencing difficulties in integrating into the more settled communities and where families are seeking alternative bricks and mortar accommodation to meet their needs. However, there is no indication of any psychological aversion to bricks and mortar accommodation which might create a need in the context of Government guidance.

The 15 Year Projection

To take account of the current position which has concluded there is no identified 'need' for pitch provision, but acknowledging there may be a need in the future, growth rates of 3% for Gypsy and Traveller families⁸ will be applied to the current total household level (including families in caravans and in bricks and mortar accommodation) over the Plan period. This is based on the average national estimates. It is unlikely that all households will form and need independent accommodation. In order to account for a degree of pitch sharing that may take place in practice, a ratio of pitch sharing has been assumed at a rate of 1:0.75.

Calculation: 3% of 30 households = 0.9
x 15 years = 13.5
x 0.75 = 9 pitches.

Since no new family formations are expected from Travelling Showpeople over the life of the Local Plan (based on the three households currently within Crawley), no calculation has been made regarding their growth rate at this stage. If the additional plot sought within the existing site were not to receive a favourable planning decision then it would be necessary to consider whether a site in an alternative location within Crawley would suit the needs of the household.

⁷ See Health and Social Care Needs of Gypsies and Travellers in West Sussex: Report to NHS West Sussex and West Sussex County Council, 2010, Page 46.

⁸ In terms of the future 'needs', the Gypsy and Traveller Accommodation Needs Assessment Guidance (2007, Para 93) contends that the average growth rate of the Gypsy and Traveller households nationally is approximately 3-4%.

The Council's Approach

In the context of this GTAA, the council, in view of the interview evidence obtained, believes that there is no immediate 'need' for additional Gypsy and Traveller sites. This is based on the conclusion that none of the interviews with the GTTS population have identified a genuine 'need' and that these results could reasonably be assumed as the position across the travelling community living in bricks and mortar accommodation within Crawley currently, particularly because the other families did not choose to take part in the interview process which gave them an opportunity to express their needs.

However, in terms of identifying a future 'need' for Gypsies and Travellers living within bricks and mortar accommodation, the locally generated evidence herein cannot be taken as conclusive, and subsequently, it is likely that there will be a net increase in the number of Gypsy and Traveller households in the borough over the next ten year period⁹. As such, the council recognises that the future 'needs' of Gypsy and Traveller families living within bricks and mortar accommodation will necessitate the LPA to identify a 'reserve' travelling site at this stage in the Local Plan process. This planning policy position will be accompanied by a proactive corporate approach by the council (as described below) to support the travelling community living in bricks and mortar accommodation.

Transit Provision

Transit sites assist Gypsies and Travellers in their traditional way of life through the provision of short term stopping places. There is also a requirement for LPAs to co-operate with travellers, their representative bodies and local support groups, other Local Authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan in light of historical demand.

The questionnaire contained six questions directed towards transient Gypsies and Travellers to aid the assessment for transit pitches/plots (Questions 14 - 19). However, since we were only able to interview Gypsy and Traveller households in bricks and mortar accommodation (with one exception), these questions were not applicable (see Appendix A).

The GTAA recognises that the scale of unauthorised encampments experienced in Crawley is relatively small and as such the formal provision of a transit site is unlikely to be necessary based upon the information obtained so far. However, the council is working closely with its neighbouring Local Authorities to assess 'need' and identify a transit site if required.

⁹ It is noted that in the case of Gypsies and Travellers, it will probably not prove realistic to try and forecast for the whole Development Plan period (fifteen years), but only for the next ten year period (see Gypsy and Traveller Accommodation Needs Assessment Guidance, 2007, Para 94).

PART B: MEETING NEEDS

4. CORPORATE APPROACH FOR BRICKS AND MORTAR ACCOMMODATION

As previously discussed, the council understands that Gypsies and Travellers living within bricks and mortar accommodation may form part of future site demand, with an aspiration to move onto sites.

However, in accordance with current planning guidance¹⁰, when assessing the needs of housed Gypsies and Travellers, the council should also be seeking to 'identify the ways in which housing may be made to work better for them, and made more attractive to Gypsies and Travellers in general' (Gypsy and Traveller Accommodation Needs Assessments Guidance, DCLG, 2007, Para 26).

Central government has also stated that this could be an appropriate strategy for reducing the numbers who leave or wish to leave housing for sites, and moreover, encourage households on unauthorised sites to move into bricks and mortar accommodation.

Therefore, the council will continue to seek the opinion of the GTTS community in relation to how far alterations to their current bricks and mortar accommodation would make their accommodation more suitable. This may include measures such as space for parking touring caravans (this question was asked in the 'needs' questionnaire, see Appendix B).

¹⁰ See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG, Para 26 and 76.

5. RESERVE SITE IDENTIFICATION

Whilst the surveys of those in bricks and mortar accommodation has, so far, not identified any immediate need for additional sites, it is inherently improbable that within the next ten years there will be no new household formed requiring additional site provision.

Based on the existing population, and the number of unauthorised sites within the borough, it has been estimated that a site (or 2 smaller sites) suitable to accommodate up to 10 Gypsy and Travellers pitches is necessary to meet an emerging, potential future need.

Appendix E establishes the criteria used for the initial assessments of sites within the borough. The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the built-up area. The presence of Gatwick Airport also renders a significant amount of land to the north of the borough unsuitable for residential development, due to noise constraints, and other areas of land are constrained by flood risk.

In addition, land which could be made available for development is under pressure from other uses, most notably housing. In this respect, the council is aware that, given the projected growth of the local population, it will not be able to meet locally generated needs for housing, either in terms of market or affordable housing. Much of the land which could be made available for development is itself in constrained locations or is land in use for community purposes. Therefore, the council will have to only consider allocating Gypsy and Traveller sites for only those travellers that are in genuine accommodation 'need'.

Notwithstanding these constraints, there are sites which, in planning terms, could be considered as potential traveller sites. In addition to the general site assessment carried out, these sites have been additionally scrutinised through the Sustainability Appraisal process and are subject to public consultation (3 June – 1 July 2013).

Site Assessments

Extensive assessment into suitable site availability for the provision of Gypsy and Traveller accommodation within Crawley has been carried out by the council over a substantial period of time; including:

- an initial council assessment in 2004;
- followed by a consultants assessment of 29 separate sites (September 2004);
- community consultation on sites in 2005;
- Consideration of sites following the 2005 consultation during 2006;
- General 'call for sites' as part of 2009 Core Strategy Review consultation;
- General 'call for sites' as part of 2012 issues and option Local Plan consultation;
- Further site identification and assessment during 2012/13
- Sustainability Appraisal of consultation options sites 2013

The conclusions of these assessments have indicated the extremely limited options available within the administrative boundaries of Crawley. Nevertheless, 2 sites have now been identified as potential options for consultation as a reserve Gypsy and Traveller site. These are:

- **Option 1: Broadfield Kennels**
- **Option 2: Land North of Langley Walk**

Broadfield Kennels

Broadfield Kennels is located to the west of the A264, owned wholly by the council and straddles the Crawley and Horsham administrative boundaries.

Access to the site is off the A264 dual carriageway up a steep, poorly surfaced road. The site is generally level, extends to approximately 2 hectares, and sits in an elevated position adjacent to the A264. The site is outside of the flood risk zone. The site is reasonably secluded from the few surrounding uses, but includes a pedestrian link under the A264 into the Broadfield Neighbourhood. The neighbourhood centre is 900m (walking distance) away.

The site is located outside of the Built-Up Area Boundary, within the High Weald Area of Outstanding Natural Beauty (AONB). As a result of these designations, development of this site for residential use would not normally be appropriate.

Land in this area was assessed in the early stages of the previous Core Strategy for use as a Gypsy and Traveller site and was not progressed as an option because of the highway access issues. However, access arrangements may be resolvable and this issue would need further work to see if a satisfactory and workable arrangement can be designed that satisfies WSCC Highway requirements.

In terms of other planning policy considerations, recent national guidance on GTTS site provision allows Local Authorities flexibility when no other reasonable options exist and constraints such as countryside location and AONB can be addressed through consideration as part of the Local Plan policy preparations and design of a suitable scheme.

Land North of Langley Walk

Land at Little Balgair is located to the east of Fir Tree Close and directly to the north of Langley Walk. It is owned wholly by the council. Vehicle access onto the site currently exists from Langley Walk. The site is level and extends to approximately one hectare. The site is outside the flood risk zone. The site is also in close proximity to Langley Parade, Langley Green's neighbourhood centre.

This site could be considered acceptable in the short/medium term. It lies outside of all other planning designations (including nature conservation) and is immediately adjacent to the urban area in the rural fringe. The site is outside the current Built-Up Area Boundary.

However, whilst it is outside of the noise contours for the existing single runway at Gatwick Airport, it would be within the unacceptable levels for permanent residential caravans should a second runway be permitted.

Transport modelling is being undertaken to determine the acceptability of the site access for caravans.

6. ALLOCATION POLICY FOR PITCHES

As previously discussed, during the interview process, it was evident that all the households who participated had, to varying extents, a number of health and wellbeing issues. Although the participants in bricks and mortar accommodation did not demonstrate a genuine 'need' as defined by Government guidance¹¹, it will be vital for the council to tackle such issues and to identify a genuine 'need' for plots/pitches over the plan period and beyond.

The council will look into the option of producing a Gypsy and Traveller Allocations Policy to identify those in the greatest 'need' who may require sites in the future (similar to the housing register process). Owing to the constraints on the borough, as summarised previously, particularly when the council will not be able to meet its housing needs for either market or affordable accommodation, Gypsy and Traveller households could also be assessed by a similar Allocations Policy scheme.

A Gypsy and Travellers Allocation Policy

WSCC has already adopted an Allocations Policy scheme for the GTTS community to ensure that allocations are made according to the needs of applicants, and to ensure the effective management of sites, including the protection of other residents' interests. Similarly, CBC currently uses an Allocations Policy scheme to determine an accommodation 'need' for bricks and mortar accommodation, and moreover, uses bandings to assess the severity of that need for accommodation. The council could adopt a similar approach to determine the accommodation 'needs' of Gypsies and Travellers within the borough. WSCCs allocation criteria is displayed below, and would be indicative of the criteria used by CBC if an Allocations Policy scheme is brought forward (not in order of importance):

- Presently homeless or threatened with homelessness.
- Living in overcrowded accommodation.
- The applicant or household is 'vulnerable' as assessed or advised by Social Services or the Education Authority.
- The applicant or household has medical issues as advised or diagnosed by a doctor or health visitor.
- The applicant or household has regular employment in the County* or area near the site applied for.
- The applicant can prove travelling links with the County*.
- The household has a child of school age regularly attending a school within the County*.
- The applicant or household has immediate family within the County*.

**Please note that if the council adopted such an Allocations Policy, the word 'County' would be substituted with 'Crawley'.*

If such a scheme was to be adopted, bandings could also be used to determine whether Gypsy and Traveller households within the borough are a 'high priority'. However, in line with this GTAA, Gypsies and Travellers living within bricks and mortar accommodation are only to be considered in genuine 'need' if they have a proven psychological aversion to bricks and mortar accommodation.

¹¹ See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG.

**APPENDIX A
INITIAL GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE
ACCOMMODATION NEEDS QUESTIONNAIRE**

**GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE
ACCOMMODATION NEEDS QUESTIONNAIRE**

Site/Address:

.....

Name:

Date of Interview:/...../.....

Q1. ETHNICITY OF RESPONDENT

Romany () Irish Traveller () Traveller () Showman () Circus People ()
New Age Traveller () Other () please state
Response not provided ()

Q2. COMPOSITION OF HOUSEHOLD

Please continue on a separate sheet if necessary

Name
Gender
Year or Birth/Age
Relationship to Respondent

Q3. HOW MANY PITCHES/PLOTS DOES THIS HOUSEHOLD OCCUPY?

1 () 2 () 3+ ()
Response not provided ()

Q4. IS THE PITCH / HOUSE SHARED WITH ANOTHER HOUSEHOLD(S)?

1 () 2 () 3+ ()
Response not provided ()

Q5. DETAILS OF CURRENT ACCOMMODATION?

Local Authority site pitch/plot ()
Privately owned site pitch/plot () i.e. Own land with planning permission
Unauthorised development () i.e. Own land without planning permission
Unauthorised encampment () i.e. Not own land and without planning permission
Bricks and Mortar housing ()
Side of the road ()
Other () please state

Q6. TYPE AND SIZE OF CURRENT ACCOMMODATION?

(insert number and circle size)

House () 1 2 3 4 5 or more bedrooms
Mobile Home/Chalet () 1 2 3 4 bedrooms
Touring Caravan () 1 2 3 4 bedrooms
Other () please state

Q7. LENGTH OF TIME AT CURRENT ADDRESS?

Less than 1 year ()
More than 1 year but less than 5 years ()
More than 5 years ()
Response not provided ()

Q7a. IF LESS THAN 1 YEAR, WHERE WERE YOU LIVING BEFORE?

Address/Site:.....

Response not provided ()

Q8. ARE ANY PITCHES/PLOTS EXPECTED TO BECOME VACANT ON YOUR SITE IN THE NEAR FUTURE?

Yes () No () Don't know () Response not provided ()

If so, when:

Details (i.e. pitch no./reason)

Q9. ARE YOU INTENDING TO MOVE FROM THIS PITCH / HOUSE IN THE NEXT FIVE YEARS?

Yes () No ()

Response not provided ()

Q9a. IF YES, WHERE ARE YOU THINKING OF MOVING TO?

Location:

.....

Response not provided ()

Q10. IF YOU ARE PLANNING TO MOVE, WHAT WOULD BE YOUR PREFERRED ACCOMMODATION/TENURE?

Affordable/Social Housing ()

Local Authority Pitch/Plot ()

Private Pitch/Plot ()

Privately owned home ()

Privately rented home ()

Response not provided ()

Q11. ARE ANY MEMBERS OF YOUR HOUSEHOLD LIKELY TO REQUIRE THEIR OWN PITCH/PLOT IN THIS BOROUGH?

Household	Name(s)	Estimated Year Required	Type of Accommodation Required*	Is the Household registered on a site waiting list or housing register**	Where is the Accommodation Required

*** Type of Accommodation:**

A. Affordable/Social Housing

B. Local Authority Pitch/Plot

C. Private Pitch/Plot

D. Privately owned home

E. Privately rented home

F. Response not provided

**** Housing/Site Register**

G. Yes

H. No

I. Response not provided

Q12. DO YOU HAVE ANY LAND THAT YOU WOULD LIKE TO BE CONSIDERED FOR A NEW SITE/ADDITIONAL PITCH?

Yes () No ()

Response not provided ()

Location/Address:.....

Additional Questions to Ask to Travelling Showpeople

Q13. IS THERE SUFFICIENT PROVISION AVAILABLE FOR STORAGE OF EQUIPMENT?

Yes () No ()

Response not provided ()

TRANSIT GYPSY AND TRAVELLER QUESTIONS

Q14. WHERE HAVE YOU TRAVELLED FROM (LAST ACCOMMODATION)?

Location/Address:.....

Response not provided ()

Q15. WHAT IS THE PURPOSE OF YOUR VISIT TO THE BOROUGH/DISTRICT? (for example visiting family or for work opportunities).

.....

Response not provided ()

Q16. WHY DID YOU TAKE UP OCCUPATION OF THIS PARTICULAR SITE (unauthorised encampments)?

.....

Response not provided ()

Q17. DO YOU HAVE A BASE ELSEWHERE?

Location/Address:.....

Response not provided ()

Q18. HOW LONG DO YOU INTEND TO REMAIN ON THIS LAND/SITE?

.....

Response not provided ()

Q19. IF YOU ARE REQUIRED TO VACATE THIS LAND/SITE, WHERE WILL YOU RELOCATE TO?

.....

Response not provided ()

Have you any comments relevant to this questionnaire that you wish noted?

.....
.....
.....
.....
.....

Your assistance in answering these questions is appreciated

**GYPSY, TRAVELLER ACCOMMODATION NEEDS QUESTIONNAIRE
TES MODIFIED VERSION FOR BRICKS AND MORTAR RESIDENTS
QUESTIONS REMOVED (Q3, Q5. Q8. 13. 14. 15. 16. 17. 18. 19.)**

ORIGINAL QUESTION NUMBERS KEPT FOR CONSISTENT COMPARISON

**RESPONDENT CAN REMAIN ANONYMOUS (NEIGHBOURHOOD LOCATION
REQUIRED)**

Site/Address:

.....

Name:

Date of Interview:/...../.....

Q1. ETHNICITY OF RESPONDENT

Romany () Irish Traveller () Traveller () Showman () Circus People ()
New Age Traveller () Other () please state
Response not provided ()

Q2. COMPOSITION OF HOUSEHOLD

Please continue on a separate sheet if necessary

Name
Gender
Year or Birth/Age
Relationship to Respondent

Q4. IS THE HOUSE SHARED WITH ANOTHER HOUSEHOLD(S)?

1 () 2 () 3+ ()
Response not provided ()

Q6. TYPE AND SIZE OF CURRENT ACCOMMODATION?

(insert number and circle size)
House () 1 2 3 4 5 or more bedrooms

Q7. LENGTH OF TIME AT CURRENT ADDRESS?

Less than 1 year ()
More than 1 year but less than 5 years ()
More than 5 years ()
Response not provided ()

Q7a. IF LESS THAN 1 YEAR, WHERE WERE YOU LIVING BEFORE?

Address/Site:.....
Response not provided ()

**Q9. ARE YOU INTENDING TO MOVE FROM THIS PITCH / HOUSE IN THE NEXT
FIVE YEARS?**

Yes () No ()
Response not provided ()

Q9a. IF YES, WHERE ARE YOU THINKING OF MOVING TO?

Location:
.....
Response not provided ()

Q10. IF YOU ARE PLANNING TO MOVE, WHAT WOULD BE YOUR PREFERRED ACCOMMODATION/TENURE?

- Affordable/Social Housing ()
- Local Authority Pitch/Plot ()
- Private Pitch/Plot ()
- Privately owned home ()
- Privately rented home ()
- Response not provided ()

Q11. ARE ANY MEMBERS OF YOUR HOUSEHOLD LIKELY TO REQUIRE THEIR OWN PITCH/PLOT IN THIS BOROUGH?

Household	Name(s)	Estimated Year Required	Type of Accommodation Required*	Is the Household registered on a site waiting list or housing register**		Where is the Accommodation Required

*** Type of Accommodation:**

- A. Affordable/Social Housing
- B. Local Authority Pitch/Plot
- C. Private Pitch/Plot
- D. Privately owned home
- E. Privately rented home

F. Response not provided

**** Housing/Site Register**

- G. Yes
- H. No
- I. Response not provided

Q12. DO YOU HAVE ANY LAND THAT YOU WOULD LIKE TO BE CONSIDERED FOR A NEW SITE/ADDITIONAL PITCH?

- Yes () No ()
- Response not provided ()

Location/Address:.....

**APPENDIX B
SECOND GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE
ACCOMODATION NEEDS ASSESSMENT**

Gypsies and Travellers Interview Questions

Name:
Address:
Date:

Questions

Need to draw out how many people live in the house? – Cross reference to the original questionnaire.

--

Who is taking part in the interview?

--

What do you like/dislike about your house? Probe why this is the case.

--

Thinking about the area you live in. What do you enjoy most about living in the area?
Why is that?

--

What do you not enjoy about living in the area? Why is that?

Do you have friends in the area?

Do you have other family members living in the area?

What are your neighbours like?

What does living here offer you and your family?

What concerns you most about living here?

Can I ask you a few questions about the general health of you and your family?
How would you describe the general health of you and your family?

What kinds of things affect your health?

What about your family? What kind of things affects their health?

What sort of adaptations to your current accommodation would be beneficial in terms of your overall health, or that of your family? Probe whether the family would be more likely to stay in bricks and mortar accommodation in the short to medium term if such adaptations were realised.

In the questionnaire you returned to us, you indicated that you need a permanent pitch within Crawley. Can you explain why you or your family require this?

When do you think you will need this?

APPENDIX C

SITE CRITERIA FOR IDENTIFYING TRAVELLER SITES

Flooding

The Planning Policy for Traveller Sites (PPTS) document produced by the Department for Communities and Local Government (DCLG) states that Local Planning Authorities should not allocate sites in areas at high risk of flooding, including functional flood plains, given the particular vulnerability of caravans. As a consequence, sites that have been identified by the Environment Agency within Zones 2 and 3 should be excluded from further consideration.

Existing & Potential Access

A preliminary assessment of access has been made by the Forward Planning Officer, and known issues with access on several sites have been considered. West Sussex County Council (WSSCC), as the Highway Authority, could make objections to particular sites, and this will aid short-listing where other constraints exist. The cost and implications of any highway improvements (such as increasing the openness of a particular site) will need to be considered in more detail when an objection is raised.

Ownership and Deliverability

For a GTTS site to be considered deliverable in the first five years of the Local Plan, the PPTS states that 'the site should be considered to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable' (PPTS, Para 9). Owing to the existing land values of the majority of the sites within the borough, and moreover, the potential management issues of a site, the assessment has tended to assess sites under the council's ownership.

For potential sites under private ownership, the desires of the landowners should be taken into account.

Access to Community Facilities

In line with the PPTS (Para 23), it has been noted that Local Planning Authority's (LPAs) should strictly limit new traveller sites in the open countryside away from existing settlements. In the case of Crawley, the proximity of Travellers to facilities away from existing settlements is unlikely to be a significant factor. In addition, sites should have a safe pedestrian access to local facilities, particularly schools and health services.

Noise

Noise has been considered in terms of impact on residents of a site, and moreover, the noise arising from the site affecting adjoining residents. In terms of Crawley, the greatest noise impacts affecting the occupants of the site would be Gatwick Airport and the M23.

The consideration of airport noise for this site assessment was based upon discussions with the borough's Environmental Health Officers, which has been put forward as part of Policy H5 of the Preferred Strategy Local Plan Draft (October 2012). The assessment was based upon the Civil Aviation Authority's noise contours for both an existing single runway and potential two runway scenario.

Subsequently, the following position has been taken in terms of proposals for new permanent and transit sites for Gypsies, Travellers and Travelling Showpeople (GTTS).

- Proposals for permanent GTTS sites should not be subject to existing or predicted air, road and/or rail noise in excess of 57 decibels.
- Proposals for long term temporary sites (of up to one month) should not be subject to existing or predicted air, road and/or rail noise in excess of 60 decibels.
- Proposals for short term temporary sites should not be subject to existing or predicted air, road and/or rail noise in excess of 66 decibels.

These figures are lower than for most bricks and mortar accommodation owing to the nature of GTTS accommodation, and moreover, difficulties in providing such accommodation with noise insulation to the same standard as what could be achieved in bricks and mortar accommodation.

Size and Layout of Site

In terms of site size, reference has been made to the 'Designing Gypsy and Traveller Sites: Good Practice Guidance' (DCLG, 2008), which outlines the main requirements of designing modern Gypsy and Traveller sites. In terms of approximating a site size, both the 'pitch'¹² size and the minimum number of pitches likely to be successful were according to the national guidance were used to ensure that a minimum site size could be calculated.

Size of Site:

It is recognised in the guidance that there is no one ideal size of site or number of pitches that would be conducive for all of the GTTS community. However, the guidance does suggest 'that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage' (Para 4.7). In addition, sites of only three or four pitches can also be successful, particularly when designed for a large single family. Subsequently, the minimum number of pitches to be considered for a site would be three.

Size of Pitch:

As a general guide, and in line with national guidance recommendations, the average family pitch must be capable accommodating an amenity building, a large trailer and touring caravan, a parking space for two vehicles and a small garden area. The amenity building must include, as a minimum, 'hot and cold water supply; electricity supply; a separate toilet and hand wash basin; a bath/shower room; a kitchen/dining area' (Para 7.17). Taking into account the requirements listed above, and moreover, considering the space standards of the borough in relation to the amenity building, an approximate figure of 160 m² for each pitch has been established.

Consequently, the council has sought to assess sites that are above 0.1Ha (or 1000m²), which would take into account access, soft/hard landscape buffering parking requirements and turning space.

Finally, these sites need to be able to provide essential on site servicing; water, power, sewerage, waste disposal and drainage facilities.

¹² For the purpose of this assessment, a 'pitch' refers to only a Gypsy and Traveller site that provides for residential uses.

Visual/Environmental Impact

In particular, consideration has been given to land levels and screening, either through vegetation or buildings.

Land Levels:

This has been examined to determine whether the site is level enough to accommodate a site or whether the site has the potential to be levelled and the implications of this.

Screening:

Firstly, the existing vegetation and buildings were examined to determine whether the screening was appropriate for that potential use. Secondly, the potential for improving the soft landscaping of the site was also considered. Furthermore, and in line with the PPTS, the site was also considered appropriate if there was no requirement to enclose the site with hard landscaping, high walls and/or fences, since this could give the impression that the site is deliberately isolated from the community.

Lastly, the site was examined in terms of whether there views available of the site from land that is accessible from the public.

Neighbours

This criterion considers the impact on adjoining neighbours if a Gypsy and Traveller site was to be utilised and conversely, considers the impact of adjoining uses on the any potential Gypsy and Traveller site. In terms of the first issue, it is assumed that good management of a site should ensure that noise and disturbance issues are limited. However, in line with the PPTS (Para 16 -17), LPAs should consider, wherever possible, including traveller sites suitable for mixed and residential uses, having regard to the amenity neighbouring residents and occupants. Subsequently, some weight should be afforded to this issue where applicable.

However, if the potential Gypsy and Traveller site was to be adjoining employment uses (particularly units that have planning permission to be used as B2; General Industry), then noise from such uses would need to be considered. Indeed, if such sites would be considered inappropriate, or even a 'Statutory Nuisance', than greater weight should be afforded to such issues.

Planning Policy

This policy section relates to the policies contained in the Preferred Strategy 'Local Plan'. Some of the critical policies (although not exhaustive) that have been examined are outlined below:

Policy CH3 – Normal Requirements of All New Development

New developments should be of a high quality in terms of design in order to protect and enhance the distinctive character of the town.

Policy CH12 – Development outside the Built-Up Area

New developments that are inappropriate for the open countryside or rural fringe should not be considered favourably outside the Built-Up Area Boundary (BUAB), particularly when they adversely affect the character of the countryside/rural fringe.

Policy H5 – Gypsy, Traveller and Travelling Showpeople Sites

This policy outlines the noise requirements as previously discussed, and moreover, does not create a design and amenity impact that is incompatible with the surrounding area.

Policy GAT2 – Safeguarded Land

Only new developments within the designated safeguarded area that are minor in nature (such as a change of use and small scale building works) will be allowed in this location.

Planning Designations

Within Crawley Borough Council's administrative area, natural environmental policy designations include Areas of Outstanding Natural Beauty (AONB), Sites of Nature Conservation Importance (SNCI), Local Nature Reserves, (LNR), Ancient Woodland, Structural Landscaping, Strategic Views, Archaeologically Sensitive Areas and the BUAB. In terms of the built environment policy designations, these include Conservation Areas, Areas of Special Character, Historic Gardens, Listed and Locally Listed Buildings.

Most significantly in terms of Crawley, land to the north of the borough is significantly constrained by the Gatwick Airport Safeguarding and land to the south and west of the borough is significantly affected by environmental designations, such as the AONB. Subsequently, a number of the Greenfield sites surrounding the borough's built-up area have significant planning policy issues that would need to be overcome.