

Shropshire SAMDEV Plan Examination - Responses to comments on amended Shropshire GTAA evidence

Name of Respondent	Summary of Issues Raised	Shropshire Council Response
Amy Pattinson	Warrant Road Caravan Park 2 should not be included as provision in the GTAA. The pitches are not fully available / suitable for gypsy families as the site owner is selective about prospective residents and is also catering for the settled community. No Gypsy and Traveller families were interviewed for the GTAA indicating the pitches on this site are not available and suitable.	The permitted pitch provision and the informal, mixed allocations policy at Warrant Road Caravan Park 2 are recognised in the Council's responses to the Inspector and the actual pitch provision (25 pitches) is included in the amended GTAA (2015). The Council is securing access to the site to undertake a survey of occupants to clarify the current level of Gypsy and Traveller households on site. The results of this survey may necessitate a further revision to the accommodation assessment in the amended GTAA.
	Insufficient choice of private pitches in Shropshire.	The GTAA (Tables 4.1a & 5.2) identifies 19 private authorised sites with 82 pitches in Shropshire. The general preference exercised by the Gypsy and Traveller population is for small sites of less than 6 pitches which is recognised. This is reflected in the increasing trend towards private site provision by the Gypsy and Traveller communities for their own use. This will be facilitated further by the provisions of the PPTS and Core Strategy Policy CS12.
	Planning applications for sites attract significant opposition and struggle to secure planning permission.	This pressure is recognised. Core Strategy Policy CS12 (with the PPTS) seeks to enable further pitch provision on extended or appropriate new sites in the County.
	The allocation of new sites in the Local Plan is necessary for a satisfactory choice of private (non-Council) sites to meet needs up to 2026 especially for the next generation in accordance with statutory requirements.	The accommodation assessment in the amended GTAA considers the emerging needs of the Gypsy and Traveller communities in Shropshire. The conclusions of this assessment (para 10.8) indicates there is no shortfall in the supply of pitches up to 2027 when turnover is taken into account. In addition, favourable consideration will be given to windfall development in the current plan period and to allocating suitable sites in the proposed Local Plan review.
Roger Yarwood Planning Officer NFGLG	Concerned about methodology applied to calculation of household formation rates, in particular that the usual (3%) compound growth rate for new household formations has not been applied.	The amended GTAA applies an alternative methodology in which emerging households are identified by household surveys (with appropriate weighting to reflect all households). This method better reflects the characteristics

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	Concerns about the use of pitch turnover as a source of supply to offset accommodation needs (<i>this approach has been discredited in previous assessments</i>).	of the local population with its ageing demography. The amended GTAA assesses pitch supply to both include and exclude turnover. The projected level of turnover of 7 pitches per annum in the amended GTAA reflects the known rates of turnover (over the last 2 years) on Council sites only. It is considered that this level of turnover is appropriate as it reflects the likely effects of migration and mortality on supply. This is a 'conservative' approach.
	Potential deficiencies suggest there is a requirement for more pitch provision.	It is suggested that any potential shortfall arising from the exclusion of turnover, can be addressed by windfall development in the short term and as part of the proposed early review of the Local Plan. It should also be noted that further windfall provision for 6 pitches at Manor House Lane, Whitchurch is subject to a current planning application.
	Policy CS12 is not compliant with National guidance, so the suggestion in para 10.10 of the amended GTAA that future applications are considered in line with this Policy should be deleted. The amended GTAA should state that future applications are to be determined against the PPTS, because CS12 is not compliant.	The compliance of CS12 with national guidance was subject to discussion at the examination session. The Council indicated that CS12 provides an appropriate basis on which to determine proposals along with the PPTS. Para 10.10 will be amended to refer to the PPTS as well as CS12.
Kembertons for Henlle Park Golf Club	Council's policies have failed to properly provide for gypsy accommodation leading to inappropriate, unauthorised sites such as that at Henlle Golf course being established (details of the establishment and occupation of unauthorised site, together with enforcement history are provided in the representation).	At the relevant examination session, the Local authority submitted an explanation as to how Core Strategy Policy CS12 and the PPTS, provide an appropriate mechanism to enable sites to come forward to meet Gypsy and Traveller accommodation needs. There has been significant progress in site provision since 2007, with consents for around 46 permanent pitches being approved and implemented on private and public sites.
	The appeal on the unauthorised site at Henlle Golf course was allowed on the basis that there were no suitable, available, sites for the family despite an acknowledged harm to the rural amenity around the appeal site.	The Local Planning Authority does not wish to comment on the appeal decision as the Authority's position was set out at the hearing and in its statement at the time. It is recognised that the grant of temporary permission highlighted the requirement for additional pitches identified in the need assessment of the GTAA (2008) and the lack of alternative

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Kembertons for Henlle Park Golf Club	Noted that GTAA has been revised to more accurately reflect individual site size/availability.	sites for the applicant and his family.
	GTAA does not detail how the council has implemented legislative requirements and guidance in Shropshire or how the assessed lack of need that existed over the period of the preparation of the SAMDev has been addressed. The amended GTAA does not explain how the current need assessment at 2015 complies with the requirements of Core Strategy Policy CS12.	Also noted. The GTAA provides an up to date assessment of accommodation needs to inform the Authority's strategy to meet these accommodation needs. The GTAA is not expected to explain specifically how the legislative and policy requirements are met and how any unmet need is to be addressed. The amended GTAA identifies the relevant policy framework and describes how the local authority (including the Gypsy Liaison team) will ensure a satisfactory supply of pitches (including turnover) over the Local Plan period and also highlights the efforts to deliver at least 5 further pitches from 2015 to 2018 (para 10.7).
	Core Strategy Policy CS12 'Gypsy and Traveller Provision' states that the accommodation needs of gypsies will be addressed as part of meeting the needs of all sectors of the community. For the SAMDev Plan to be 'sound', the Council should show how the accommodation needs of gypsies have been considered and met as part of the overall housing need in Shropshire. It is considered that the Council has not addressed the accommodation need in this way and the GTAA is an 'after thought', undertaken by the Council to justify its lack of site identification. The GTAA was not commissioned until December 2013, by which time the SAMDev Plan had been through various stages of consultation.	The consideration of gypsy and traveller accommodation within the assessment of Shropshire's housing need was set out in the published evidence documents EV79 Housing Delivery Technical Background Paper (Section 5) & EV77 Site Allocations and Management of Development Background Paper (Section 6). This evidence notes that the current planning approach for gypsy and traveller provision started with a 'call for sites' in 2010. The sites submitted for consideration were assessed by Shropshire Council with a view to making a potential allocation to address the need for gypsy and traveller provision. However, the plan preparation timescales resulted in the existing GTAA (2008) reaching the end of its useful life (i.e. at 5 years) in July 2013. A new GTAA was therefore considered necessary to update the accommodation assessment and to recognise the positive progress in the delivery of sites up to 2013. This revision of the GTAA supported both the preparation of the SAMDev Plan and the determination of planning applications by the Council. Full consideration has therefore been given to assessing and making provision for the accommodation

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Kembertons for Henlle Park Golf Club		needs of Gypsy and Travellers and this has been undertaken on the basis of a contemporary assessment of the need for and supply of pitches in the County.
	Representations were submitted by Henlle Golf Club at various stages in the SAMDev process pointing out the lack of clear policies for dealing with gypsy accommodation, and the lack of consideration given to other private and community interests. There were, however, no continuing consultation drafts of the proposed gypsy policies.	At the relevant examination session, the Local authority explained how adopted Core Strategy Policy CS12, together with the PPTS, provides an appropriate framework for considering proposals for Gypsy and Traveller development having regard to sustainable development and other material considerations. The SAMDev Plan will form part of a framework of national guidance, adopted plans and supplementary guidance, which together set out the approach to site provision for the gypsy and traveller community. The Council also indicated at the examination hearing sessions that the SAMDev Plan will be subjected to an early review and this will provide the opportunity to incorporate any changes to the approach set out in CS12.
	The Core Strategy and Policy CS12 was based on the premise (evidenced in the GTAA 2007) that there was a shortfall in gypsy accommodation in the County. This unsatisfied need (and GTAA 2007 evidence) was also the basis of preparatory work for the SAMDev Plan and the acknowledged position for the consideration of appeals, including that at Henlle Golf course in October 2013. At this time there was no indication of the proposed reassessment of accommodation needs.	At the time of preparing the Core Strategy and the earlier stages of preparing the SAMDev Plan, the GTAA (2008) was sufficiently up to date to provide supporting evidence for the preparation of the Local Plan.
	Despite acknowledged need (GTAA (2008) & call for sites in 2013) no new Gypsy and Traveller sites were proposed as part of the SAMDev Plan. It is unclear whether suggested sites have been considered.	The chronology of the process is described in an earlier response above. The sites submitted for consideration, in response to 2010 call for sites, were assessed by Shropshire Council with a view to making a potential allocation to address the unmet need for gypsy and traveller pitch provision. However, a review of the evidence in the accommodation need was required before any consultation on any new gypsy site proposals could reasonably occur.
	NPPF & PPTS require LPA's to make an assessment of	The GTAA (2008) did provide the Council's evidence base

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Kembertons for Henlle Park Golf Club	need and plan for sites over a reasonable timescale. However the Council failed to make their own assessment, relying on GTAA (2008).	upon which identified needs (set out in CS12 explanatory text) were assessed. The Council has legitimately sought to update this evidence of need reflecting the timescales of plan preparation and new site permissions / developments and so, the amended GTAA (2015) now sets out the Council's accommodation assessment as required by PPTS.
	In the GTAA (2014) 'turnover' is critical to the current assessment, but the methodology of the assessment of turnover is not well explained. The robustness of the turnover assumption is not convincing. The results of the survey identify no intention of any households moving pitch and this suggests no pitches will become available (i.e. turnover) and therefore potentially the need for pitches should increase by 7 pitches p.a.	It is agreed that a further explanation in the report might clarify the inclusion of turnover. The projected level of turnover of 7 pitches per annum reflects the known rate at which pitches are relinquished to other users (over the last 2 years) on Council sites only. This is a conservative approach to the inclusion of turnover. This also ignores possible turnover on private sites reflecting the household survey responses which indicated that households did not intend to move from their current pitches. In reality some level of turnover is likely to occur reflecting the impacts of migration and mortality among communities.
	It is queried whether turnover taken over a 2 year period is typical and whether some turnover may actually relate to displaced families needing alternative accommodation locally and therefore not actually releasing pitches.	As indicated above, an allowance of 7 pitches p.a. is derived from records on Council sites only and is not considered excessive. It will be reviewed and re-examined in future reviews of the GTAA over time.
	The Council's involvement of stakeholders' asked to participate in the evidence-finding did not appear to include any members or representatives of a settled community, local interests groups or Parish Councils as required by the PPTS (notably para 6). On this basis, the GTAA (2015) is not considered to be a robust assessment.	GTAA is only part of the evidence base for policy preparation, site allocations and determination of planning applications. It is suggested that the Council's accommodation assessment (based on the Arc4 survey work) has sought to comply with the requirements set out in para 6b of the PPTS for preparing the GTAA. Local communities and other interested parties are invited to be actively involved in policy development and proposed site allocations and to comment on planning applications.
	Local communities are important stakeholders that should be included in GTAA preparation particularly in view of the implications of Core Strategy Policy CS12	It is agreed that communities are important stakeholders. Communities had the opportunity to be involved in the preparation and examination of the Core Strategy (including

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Kembertons for Henlle Park Golf Club	acting with Policy CS4 in providing the mechanisms for identification of settlements as sustainable development locations for gypsy sites.	Policy CS12). Also as considered at the SAMDev Plan Examination, communities have also been involved in the identification of Community Hubs and Clusters. However there is no specific requirement for direct involvement in the GTAA which is the required assessment of accommodation need (set out in para 6b PPTS) as discussed above.
	The assessed GTAA shortfall of 19 pitches for the whole County is an inappropriate assessment of need in that it does not take into account individual locational and other requirements that may not be met by vacant pitches. This is evidenced by the inability to accommodate the occupants of the Henlle site on existing sites within the vicinity.	The methodology used for assessing accommodation needs is consistent with DCLG Guidance on Gypsy and Traveller Accommodation Needs Assessments (2007) and the PPTS requirements. Temporary pitches such as that at Henlle are also identified as part of the need in the GTAA. It is not appropriate, due to practical considerations and confidentiality issues, to seek to highlight individual family needs and how they have been met. It is expected, even where sufficient overall provision can be demonstrated, that there might be a further requirement to meet individual needs, arising in certain locations, as a result of particular circumstances, as set out in the PPTS.
	Site survey information on desired services and facilities does not provide any insight into personal / individual needs of specific households or reflect locational preferences.	See response above. Site survey information is intended to quantify overall need and satisfaction with provision. Preferences do not always equate to specific needs. There is also direct and active involvement by the gypsy liaison team and other services to seek to address specific needs.
	Not all the households were surveyed therefore new household creation and need for new pitches may be greater than 24 predicted. Survey indicates that 21 emerging households planning to live on current site, this is not good practice and demonstrates a need for new pitches. Emerging households not asked if they would wish to move to another pitch if a suitable pitch could be made available.	The need to accommodate 24 new households is the total number of potential emerging households. It is understood that the study methodology is such that the number of all potential emerging households (including where there is no household survey) has been calculated using a weighted analysis, based on results from the surveyed sites, as described in paragraph 6.13 of the amended GTAA. Emerging households, as those under 18 years (table 6.3), may not be in a position to know when or where they will need to move to a new pitch. These potential additional households are, in line with guidance, identified as a pitch

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Kembertons for Henlle Park Golf Club	Whilst a high degree of satisfaction was expressed with sites currently occupied, some pitches are occupied by more than one family. This issue was not adequately explored in the survey questions.	need for which provision should be made. It is considered that the questionnaire is extensive with 79 questions in the survey and opportunities for additional explanation by respondents. Where there is occupation of a pitch by more than one household this is identified as need in the GTAA regardless of the level of satisfaction.
	No assessment of in migration or evidence of collaborative working with neighbouring authorities in assessment as per para 8 of the PPTS. Survey identified 14 pitches occupied by families who had been permanently travelling. Since it cannot be assumed that they came from within the County, and certainly did not previously occupy pitches in the county, additional provision should be identified for such families.	Shropshire Council have explored the preparation of joint GTAAs with neighbouring authorities. Whilst this has not been feasible, there has been active liaison with authorities during the SAMDev process with some consistency of approach being assured through the use of the same consultants to produce studies for adjoining neighbours. Duty to cooperate is referenced in para 9.8 of the GTAA. The close links with Telford and Wrekin Council are acknowledged and at para 10.14 work with this Council to identify further transit provision is highlighted. The methodology has sought to establish migration and whilst there is no strong evidence from the survey, an allowance is built in for migration by the consideration of turnover (para 6.25). Additionally in the consideration of emerging household formation, it is assumed at para 6.28 that, in line with normal demographic trends, there will be both in migration and out migration as a result of marriage.
	Henlle Lane appeal site provides a good case example of new household formation by inward migration which could not be met by existing pitches. It also exemplifies the potential for unauthorised development and development being allowed on a temporary basis on appeal solely on the basis of unmet need. This need would remain despite the Council indicating no requirement for additional sites.	Methodology used for assessing accommodation need is consistent with DCLG Guidance on Gypsy and Traveller Accommodation Needs Assessments (2007) and the PPTS requirements. The provisions for in migration are set out above. It is understood from the appeal decision that the family at Henlle Lane has a long connection with the local area and even where sufficient overall provision can be demonstrated, there remains a policy provision to meet such individual needs as they arise, in appropriate locations, as set out in the PPTS.
	An inappropriate assumption is made that the gypsy	The GTAA methodology has taken into account likely growth

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Kembertons for Henlle Park Golf Club	population will remain static. It should be acknowledged that, similar to the settled population, the gypsy population will grow and assessments should take account of this natural growth and the possibility for in migration, with nil out migration.	in the form of the creation of new (emerging) households. The consultants have advised that they consider this to be a more accurate reflection of population growth than the simple application of a standard growth rate. The consultants have also suggested, from their experience of GTAA and studies across the country, that there is an ageing demographic in rural areas and therefore such populations will not generally exhibit significant growth.
	GTAA fails to adequately justify the Council's stance that no new pitches are needed in the next five years. The GTAA does not recognise the need to provide pitches in specific locations to meet needs arising from lapsed temporary permissions.	This is answered by previous responses regarding methodology. Households on temporarily authorised pitches are identified as need but not as supply. It is also not assumed that there will be no need for new pitches but potentially this need is not sufficient to justify site allocations. There would remain a requirement for the Council to consider need as it arises against the relevant policy criteria.
	Insufficient additional site identification is likely to lead to unauthorised sites / appeal sites, in inappropriate locations possibly becoming permanent.	As previously stated it is not appropriate to seek to allocate a site for a single household as policy provisions would enable this to be resolved through the ongoing development of additional site / pitch provision.
	Acknowledge aspiration in PPTS for greater provision of private sites but highlight need to guide to acceptable locations through the Local Plan process.	Noted and policy criteria and site allocation will be used appropriately where such sites are required.
	Council has not, in accordance with para 10 of the PPTS, produced criteria based policies to guide land supply allocations or provide a basis for decisions where there is no identified need. GTAA does not provide a sound base for such policies. Core Strategy Policy is not sufficiently detailed to identify suitable sites.	Policy CS12 is considered to be an appropriate basis on which to identify sites and consider proposals, in conjunction with the PPTS. The GTAA provides the necessary evidence of need which together with other evidence in Government guidance, provides the basis for policy development. The main purpose of the GTAA is to assess need and the GTAA itself does not dictate the purpose and content of policy.
	Private site provision should be facilitated in the same way as housing sites, by the Council identifying suitable sites to be developed by private developers.	The Council supports the development of further private sites. The Council would only seek to identify promoted sites in the Plan which are known to be deliverable and this would only be considered in response to a clear and compelling need at a scale which justifies making site

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	<p>Survey work does not provide conclusive proof of lack of need and study not robust evidence. As Gypsy accommodation forms part of housing need, the housing policies and SAMDev Plan are unsound.</p>	<p>allocations.</p> <p>The Council believe that the GTAA is robust and would refer back to responses regarding methodology and process (above). It is considered that the explanations provided clearly illustrate that adequate consideration has been given to the implications of the accommodation assessment for Gypsy and Travellers in the GTAA and is taken as part of the overall housing need being addressed in the SAMDev Plan.</p>
<p>South Worcestershire Councils</p>	<p>Shropshire Council have attended a stakeholder event on the Worcestershire GTAA.</p> <p>The methodology for assessing the accommodation needs of Gypsies & Travellers and Travelling Showpeople in the revised Shropshire GTAA is consistent with DCLG Guidance on Gypsy and Traveller Accommodation Needs Assessments (2007) and the Government's proposed changes to national Planning Policy for Traveller Sites (CLG consultation, 2014).</p>	<p>Agreed.</p> <p>Noted.</p>
<p>South Worcestershire Councils</p>	<p>Inclusion of turnover in the assessment of accommodation needs is consistent with the approach in Strategic Housing Market Assessments (SHMA's) and the Government's proposed changes to national Planning Policy for Traveller Sites which indicates that pitch turnover is a source of information that local planning authorities can use in assessing Traveller accommodation needs. The Shropshire approach is also consistent with the Worcestershire GTAA.</p>	<p>Noted</p>
	<p>The Worcestershire GTAA indicated relatively little need for additional pitches / plots in the five years to 2018/19, but this is forecast to increase in the periods 2019/20 – 2023/24 and 2024/25 to 2028/29. The South Worcestershire Councils are currently in the process of preparing a Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD). It is</p>	<p>Noted</p>

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	not proposed to meet any of the objectively assessed need for Worcestershire from within Shropshire.	
	The South Worcestershire Councils are grateful for this opportunity to comment on the revised Shropshire GTAA and recognise that this makes an important contribution towards the Duty to Cooperate with neighbouring authorities.	Noted
Wyre Forest District Council	No issues raised. Wish to be kept informed about any proposed sites adjoining their district.	Noted.