

Response from Heine Planning to EXAM 27

I have recently been made aware that Tewkesbury BC has decided to change their approach to meeting the needs of Gypsy Travellers (GTs) following the submission of their Borough Local Plan. According to para 3.80 of the submitted Borough Plan it was proposed to meet the needs of all GTs (ie for 78 pitches) over the plan period. I am informed that at the recent examination it was stated that the Council now only intends to meet the need of 30% of unknown households as well as all those who met the PPTS definition. If this is correct, then I consider this a very fundamental and unacceptable change to policy as submitted.

Whilst I would support the fact that the Council recognise that their GTAA is flawed and the application of a figure of 10% by ORS to unknown households is no longer considered justifiable or sustainable (indeed many studies by others are finding far higher numbers meeting the PPTS definition than ORS), if, as I am told, the Council no longer intend to honour their stated aim to meet the needs of all GTs I would have objected to the policy as submitted for the following 7 reasons:

1-the number of unknown households in the 2017 GTAA was unacceptably high and this could have a significant impact on a site allocation policy.

2-the persistent difficulties Travellers have had finding suitable sites in Tewkesbury and elsewhere in Gloucs. There is no justification to reduce the number of allocated sites. There is no evidence other authorities in the region have a surplus of sites.

3-the GTAA process by ORS is questionable. They only apply PPTS status to those who travel for work purposes. No where in PPTS is it stated that travelling has to be for work purposes and the judgments relied on by ORS refer to travel for an economic purpose which need not be solely for work purposes. Others doing GTAAs do not apply such a restrictive approach to the PPTS definition and tend to find a far higher compliance with the PPTS definition. This concern was not relevant when policy intended to meet the needs of all GTs but it is now a very significant concern if, as I am told, the Council want to restrict provision to just 30% of unknown households.

4-It is not clear how the need for caravan sites for the balance of households (ie the 70% unknown households) will be met and if other culturally appropriate accommodation allocations are included in the local plan to meet this need.

5-It is far from clear if the identified allocated sites are occupied by those who comply with the PPTS definition. If not, and they are owned/ occupied by unknown households they may not be available/ deliverable to meet the need identified.

6-the approach is unrealistic. Is the Council seriously suggesting that families should be forced to live apart simply because some still travel for work and others travel for other economic purposes or not at all? Does the council even know which families fall into which category and how will they monitor/ police such an arbitrary division if ORS were unable to establish the facts as part of their GTAA?

7-there is a current challenge to the definition in PPTS and many authorities have agreed (as Tewkesbury did in their submission plan) that there is no justification to provide separately for those who travel for an economic purpose and those who do not as they all have a need for culturally appropriate accommodation.

In my view the approach taken in policy GTTS1 was sound and overcame all these concerns as it was accepted that the cultural need of all GTs would be met. I would be worried that any late change to this approach will be unworkable and unfair. If the Council has decided to alter its approach I hope that it will be considered a main modification with opportunity for further comments/ potential objections.

Yours Sincerely

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