

CRAWLEY BOROUGH COUNCIL

# GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMMODATION NEEDS ASSESSMENT

Submission Draft: July 2023



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## EXECUTIVE SUMMARY

- The 2021 Census confirmed that the number of individuals who identify themselves as 'White: Gypsy or Irish Traveller' living within Crawley is 103. This has increased since the 2011 Census which indicated 77 individuals identified as 'White: Gypsy or Irish Traveller'. In addition, in the 2021 Census, 337 individuals identify themselves as 'White: Roma'. No individuals identified as 'White: Other Traveller' or 'Other Ethnic Group: Roma'.
- Census 2021 data suggests that 13 households within Crawley reside within a caravan or other mobile or temporary structure accommodation type. This includes six Gypsy and Traveller households residing on three private sites in caravan accommodation, and three Travelling Showpeople households sharing a single site within the borough.
- In Crawley, the majority of the travelling community population is known to be housed within bricks and mortar accommodation.
- The 2014 Gypsy, Traveller and Travelling Showpeople Housing Needs Assessment concluded that there was no identified immediate 'need' for additional Gypsy, Traveller or Travelling Showpeople sites. Nor did it highlight an actual future need.
- In order to plan for potential future need, a growth rate of 3% was applied to the number of households 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 resulted in the need to find a reserve site suitable for accommodating up to ten Traveller pitches.
- The council allocated a 'reserve' site for the future accommodation 'needs' of the Gypsy and Traveller families of Crawley in the adopted Crawley Borough Local Plan 2015 – 2030. The 2015 Local Plan identified the site as being 'developable' dependent on when the 'need' arises.
- This submission draft update to the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (July 2023) has reviewed the evidence and data in relation to the Traveller population within the borough since the adopted Local Plan. There has been no conclusive evidence which suggests there is an immediate need for a new publicly owned pitch site.
- Instead, the evidence suggests the demand for sites from the existing population was over-estimated in the 2014 Assessment and the need instead has arisen from Traveller families moving into the borough from outside the county, from publicly run sites to take up private family-sized sites.
- This assessment recommends the continued allocation of the 'reserve' site for accommodating up to ten pitches for Gypsies and Travellers in the Local Plan Review, should a need arise in the new Plan period (2024 to 2040).
- As with the adopted Plan, it is considered this site is 'developable', for availability in years 6-10 or 11-15 (2030/2031 – 2039/2040) of the Plan (once adopted) dependent on when the need arises.

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PART A: ACCOMMODATION NEEDS ASSESSMENT

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## 1. INTRODUCTION

This Assessment, referred to as the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2023 (GTAA), assesses the requirement for pitches and plots within the borough and forms part of the evidence base for the Crawley Borough Local Plan Review (2024 – 2040).

The GTAA is being conducted by Crawley Borough Council, supported by West Sussex County Council.

### Consultation

For further information about the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, please contact Elizabeth Brigden on (01293) 438624 or e-mail [strategic.planning@crawley.gov.uk](mailto:strategic.planning@crawley.gov.uk)

Hard copies of the submission draft Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment are available to be viewed at:

- Crawley Town Hall: The Boulevard, Crawley, West Sussex, RH10 1UZ. Phone 01293 438000 Opening hours: Monday to Friday 9.00am – 4.00pm
- Crawley Library: Southgate Avenue, Southgate, Crawley, RH10 6HG. Phone 01293 651744. Opening hours: Monday to Friday 9.00am – 7.00pm; Saturday 9.00am – 5.00pm

It can also be accessed electronically on the council's website at:

<https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review>

### Context

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, 2015)<sup>1</sup> 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;
- plan for sites over a reasonable timescale;
- promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- reduce the number of unauthorised developments and encampments, and moreover, make enforcement more effective;
- ensure the Local Plan includes fair, realistic and inclusive policies;
- increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- reduce tensions between settled and traveller communities in plan-making and planning decisions;
- enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- have due regard to the protection of local amenity and local environment.

The National Planning Policy Guidance confirms that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which

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<sup>1</sup> Planning Policy for Traveller Sites (2015) DCLG

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

address the likely permanent and transit site accommodation needs of travellers in their area and, in producing Local Plans, local planning authorities should:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set target;
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- c) consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density;
- e) protect local amenity and environment.

### Definitions

For the purpose of this study, in accordance with the national guidance, '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.

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

- **Gypsies and Travellers:** Gypsies and Travellers are 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.
- **Travelling Showpeople:** Travelling Showpeople are 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 as defined above.

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.

## 2. METHODOLOGY

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

### Stage One – Data Collection

In terms of assessing the data for Crawley's GTTS population, a number of resources were used to gain a wider understanding of the community accommodation needs.

A number of the datasets used for the 2014 Assessment are no longer collected. As part of the Review, the most up-to-date information held of the following data is presented:

- Information on population size of travellers within Crawley, including data from other organisations on the number of families and individuals (including the 2021 Census);
- A review of sites within Crawley;
- Unauthorised traveller sites, encampments and development including information on the number of caravans on each site and length of occupation (Appendix A);
- Homeless presentations of travellers;
- Housing register and Re-housing data regarding the re-housing of travellers; and
- Planning application data for the previous eight years (since the adoption of the Local Plan in December 2015).

### Stage Two – Traveller Questionnaires

The questionnaire (Appendix B) and interview process was carried out for the 2014 Study. The methodology for undertaking this was tailored to Crawley's circumstances and aimed to maximise the response rate.

#### Initial Questionnaire (2014)

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

Interviews were led by a trained and experienced Community Liaison Officer at Crawley Borough Council (CBC) who had 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.

#### Second Questionnaire (2014)

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 C) 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. To facilitate further participation in this assessment, the assessment remained live and open to additional interview data up to the completion of the 2015 Local Plan.

#### Review Questionnaires (2023)

As part of this review of the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, the initial questionnaire is being reissued to those traveller families located on pitch sites within the borough (Appendix B).

A further questionnaire (Appendix D) has been prepared for those families previously interviewed, if it is possible to identify these families, to understand if their anticipated future needs have been met where these arose.

Support and advice has been sought from Traveller liaison groups and the officer liaising most closely with the Traveller community in Crawley, now a West Sussex County Council officer.

#### Stage Three – Analysis and Presentation of Results

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

- Part A: Accommodation Needs Assessment Data Analysis and Results
  - Demand for sites within Crawley;
  - Need for site provision within Crawley.
- Part B: Meeting Needs
  - Taking forward the conclusions of the Accommodation Needs Assessment.

#### Site Identification

##### Initial Assessment Criteria

Detailed potential site analysis has been undertaken within Crawley over the last 20 years. A comprehensive study was prepared by consultants (2004) which objectively assessed the opportunities within Crawley, as well as immediately outside or partially outside the borough boundary, for a new Traveller pitch site. This included detailed investigation through site visits and an assessment against a series of criteria.

##### Fundamental Constraints:

- Landownership
- Highways objections
- Flooding
- Environmental criteria – Sites of Nature Conservation Importance (now known as Local Wildlife Sites), AONB, trees.
- Noise contours from Gatwick Airport
- Health and Safety – Gas Works/High Voltage Electricity Lines/Landfill/Land-Raising
- Water Supply and Sewerage

##### Local Plan (2000) Policies:

- Proven need for provision within the local area;
- Proximity of site to shops, schools, employment, medical facilities and public transport;
- Need to protect the countryside, the best and most versatile agricultural land and other important natural areas;
- Impact of the proposal on the amenity and environment of adjacent neighbours and on the surrounding area;
- Site is provided or capable of being provided with mains water, electricity supply, sanitary facilities, sewerage and refuse disposal arrangements;

- The extent and hours of operation of any commercial use on the site.

Additional Considerations:

- Financial Implications
- Size
- Neighbours
- Police Issues
- Access to Facilities

The scoring template used for these site assessments is set out in Appendix E.

This assessment concluded that each of the sites identified for consideration at that time was subject to particular constraints and none were considered suitable for such accommodation.

#### Identifying the Broadfield Kennels Reserve Site

As part of the preparation for the adopted 2015 Local Plan, possible site opportunities were reconsidered in detail again. This included revisiting those previously considered and looking at all other known available sites as well as additional sites identified through the calls for sites and Local Plan consultation process, within the borough, rural and urban, and immediately adjacent to the administrative boundary. These sites were assessed against the updated criteria, set out in detail in Appendix F.

From this assessment, two options for the location of a 'reserve' permanent pitch site were subject to public consultation for a period of four weeks alongside the additional 'preferred strategy' sites consultation between June and July 2013 (Section 5 and Appendix G). Comments which were received as part of this consultation are summarised in Appendix G and can be found, in full accompanied by the council's officer responses, in the 2015 Local Plan Statement of Consultation<sup>2</sup>.

One site was identified for progressing to an allocation in the 2015 Local Plan as a reserve Gypsy and Traveller Site for up to ten pitches: Broadfield Kennels, southwest of the A264. In finding the Local Plan "sound", the Planning Inspector confirmed:

*"A recent needs assessment found that, while there is not an immediate or short-term need for a site for gypsies and travellers, a reserve site should be identified to meet a possible need for up to ten pitches from newly-formed families in future years. Broadfield Kennels, a vacant Council-owned site, is in most respects ideally located, being on the edge of the settlement but reasonably secluded from surrounding uses and close to the facilities of Broadfield Neighbourhood..."*

*"...I believe that the site is the only reasonable option of the alternatives identified and there is no evidence that the possible need could be met elsewhere. Thus in principle limited development on this previously developed land in the AONB is acceptable..."<sup>3</sup>*

This site is allocated through Policy H5 of the adopted 2015 Crawley Local Plan and shown on the Local Plan Map as a reserve Gypsy, Traveller and Travelling Showpeople Site.

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<sup>2</sup> Crawley 2030 Local Plan Statement of Consultation (2015) Appendix 4: Early Engagement Additional Site Consultation <https://crawley.gov.uk/sites/default/files/documents/PUB206700.pdf>

<sup>3</sup> Report on the Examination into Crawley Borough Local Plan 2015-2030, paragraphs 68-70 (November 2015) Inspector Martin Pike, The Planning Inspectorate: <https://crawley.gov.uk/sites/default/files/documents/PUB270981.pdf>

#### Local Plan Review (2019 – 2023)

The Local Plan Review process has not highlighted an alternative site which could be considered.

This has included:

- Calls for Sites;
- the formal public consultation periods;
- the Strategic Housing Land Availability Assessment; and
- the Sustainability Appraisal/Strategic Environmental Assessment.

The Local Plan Review process has also not raised any additional concerns relating to the existing allocation which would require further scrutiny beyond that already undertaken for the 2015 adopted Local Plan, and addressed through the policy wording.

Representations received in relation to the council's draft Gypsy and Traveller Policy and evidence, as part of the four public consultations undertaken in relation to the Local Plan Review (Regulation 18: July – September 2019; Initial Regulation 19: January – March 2020; Additional Regulation 19: January – June 2021; and May – June 2023) are set out in Appendix H.

On this basis, the allocation of Broadfield Kennels as a Reserve Gypsy and Traveller Site for up to 10 pitches has been taken forward into the Local Plan review and is set out in Policy H8 of the Submission Crawley Borough Local Plan 2024 – 2040 (Appendix I).



### 3. DATA ANALYSIS AND RESULTS

#### Gypsy, Traveller and Travelling Showpeople Population within Crawley

The 2021 Census confirmed that there are 103 individuals within Crawley who have identified themselves as 'White Gypsy or Irish Traveller', with members of the GTTS community living in the Bewbush, Broadfield, Ifield, Langley Green, Maidenbower, Northgate, Pound Hill, Southgate, Three Bridges and West Green neighbourhoods. This has increased since the 2011 Census which indicated 77 individuals identified as 'White: Gypsy or Irish Traveller'.

In addition, in the 2021 Census, 337 individuals identify themselves as 'White: Roma'. This was a new category for the 2021 Census, which had not been a response option in the 2011 Census.

No individuals identified as 'White: Other Traveller' or 'Other Ethnic Group: Roma'.

There is no authorised, publicly owned and maintained site provision within Crawley.

Census 2021 data suggests that 13 households within Crawley reside within a caravan or other mobile or temporary structure accommodation type. This includes six Gypsy and Traveller households residing on three private sites in caravan accommodation. Each of these sites are authorised for two pitches.

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. 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 and encampments within the borough can be used to inform the overall demand for travelling sites. The data for the county is collected by West Sussex County Council, and includes information on the number of encampments per year, their location, number of caravans and the length of occupation. The data tables are set out in Appendix A.

Information in relation to the number of caravans and days, as well as the total encampments West Sussex-wide, for the year 2020/21 is unknown.

#### Number of Encampments in Crawley

As the graph below illustrates (Figure 1), the number of total annual encampments experienced within Crawley is low, particularly when compared to West Sussex as a whole.

The total number of encampments experienced in Crawley over the past two years (2021/22 and 2022/23) has been one for both years.

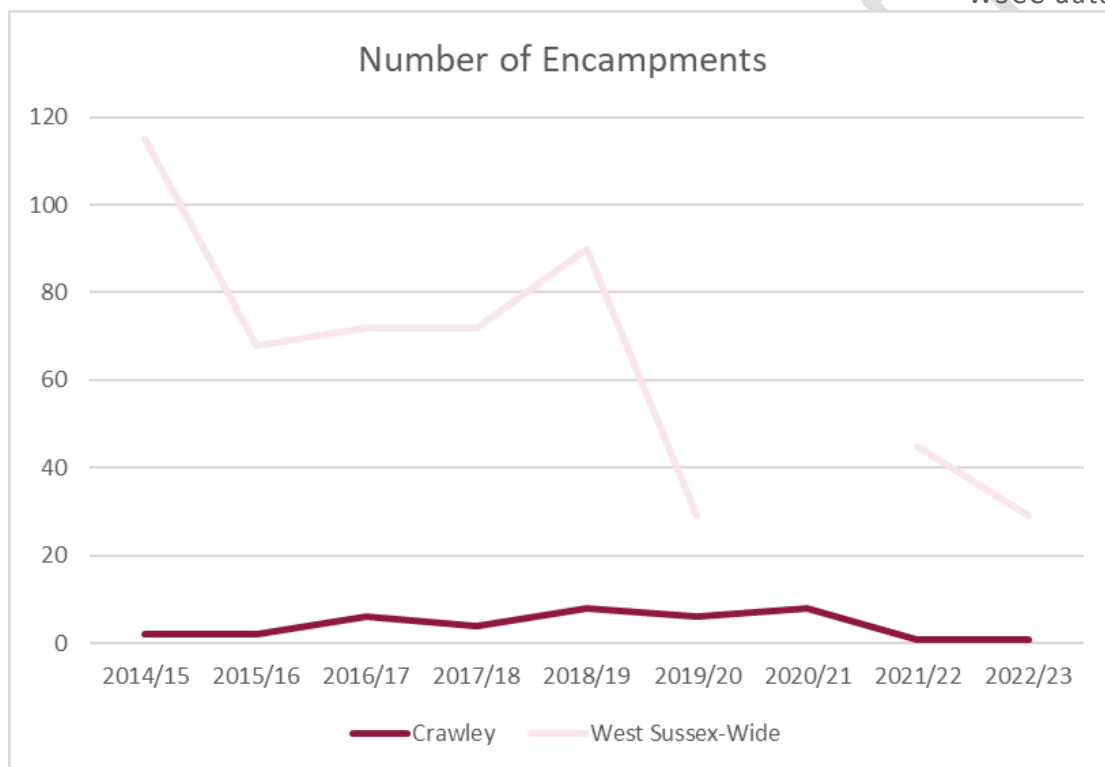
The encampments data for Crawley tends to suggest the transit nature of the Travelling community's needs. The largest number of encampments are located in the authorities situated along the coast, reflecting this as the desired destination point. This can also be supported by the data behind the numbers, in relation to the purpose of the encampments. All but one of the encampments within Crawley were registered as visiting, one specifying the purpose of the encampment was holidaying from the Brighton area. Only one encampment was for the purposes of living; this

was for a single caravan located on the highway outside of the property of a Gypsy and Traveller family (in 2014/15).

Between 2014/15 and 2018/19, those within the borough have formed 5% of the total number of encampments recorded in the county. This is the lowest proportion of any of the West Sussex districts and boroughs (each of whom varied between 11% and 22%). The highest pressures of encampments have been located in the West Sussex coastal authorities.

The county-wide rise in number of annual encampments for 2018/19 compared with the previous two years (2016/17 and 2017/18) was not identified as being due to any particular reasoning, except the good weather experienced during the summer period. The majority of encampments over that summer were by travellers new to the area.

Figure 1: Number of Encampments (annually) in Crawley 2014/15 – 2022/23, WSCC data



#### Location of Encampments within Crawley

The location of the encampments within Crawley has been geographically spread across the town, within the Built-Up Area boundary. These have included playing fields, car parks, education land and commercial/industrial land, both in public and private ownerships.

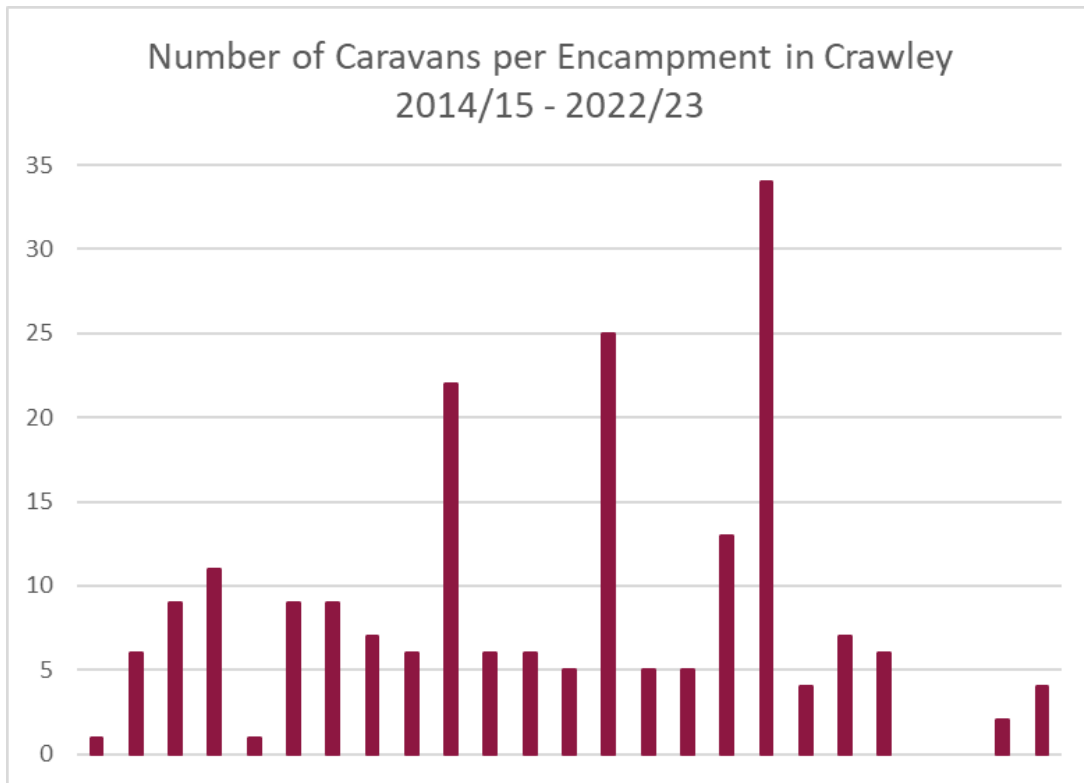
#### Number of Caravans per Encampment in Crawley

The number of caravans involved in each encampment varies. In Crawley, over the period 2014/15 to 2018/19, the largest number of caravans in a single encampment was 34 caravans (in 2018).

With the exception of this, a further occasion in 2018/19 of 25 caravans and one other occasion, in 2017/18, of 22 caravans, the number of caravans in each encampment averages around 6 caravans (from 1 – 13 caravans), as illustrated by Figure 2 below.



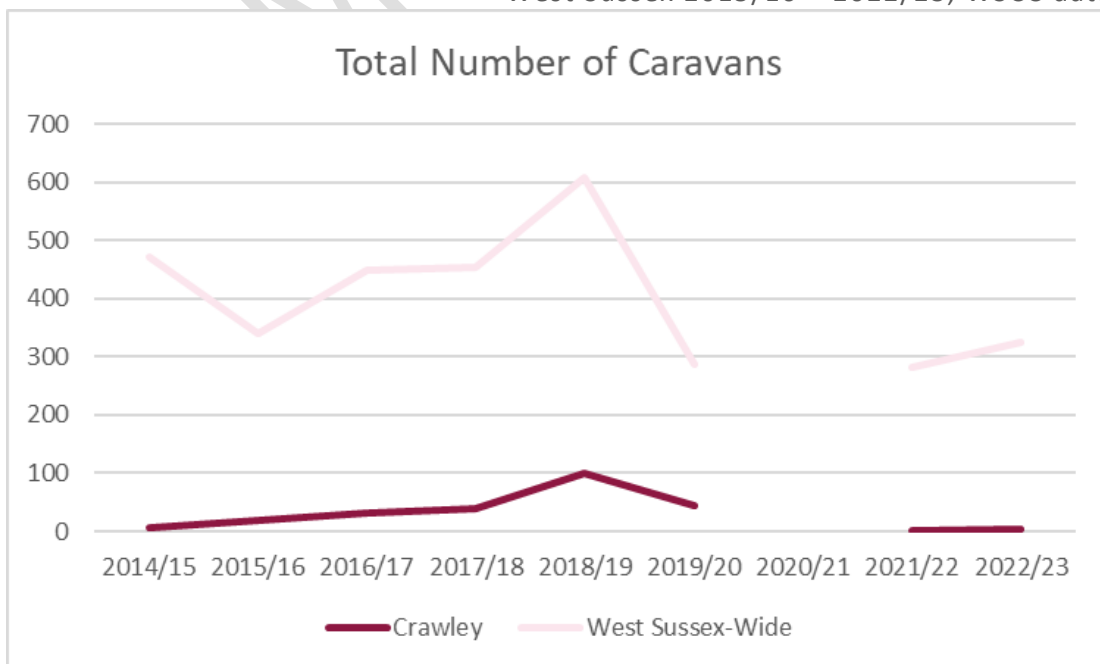
Figure 2: Number of Caravans per Encampment in Crawley 2014/15 – 2022/23, WSCC data



The total number of caravans annually on encampments in Crawley peaked in 2018/19 (highlighted in Figure 3 below), reflecting the larger numbers of vehicles on two occasions (discussed above), as well as the slight increased number of encampments occurring during that year (eight in total).

For the two most recent years (2021/22 and 2022/23), in the single incidences, the total number of caravans for these encampments were 2 and 4 respectively.

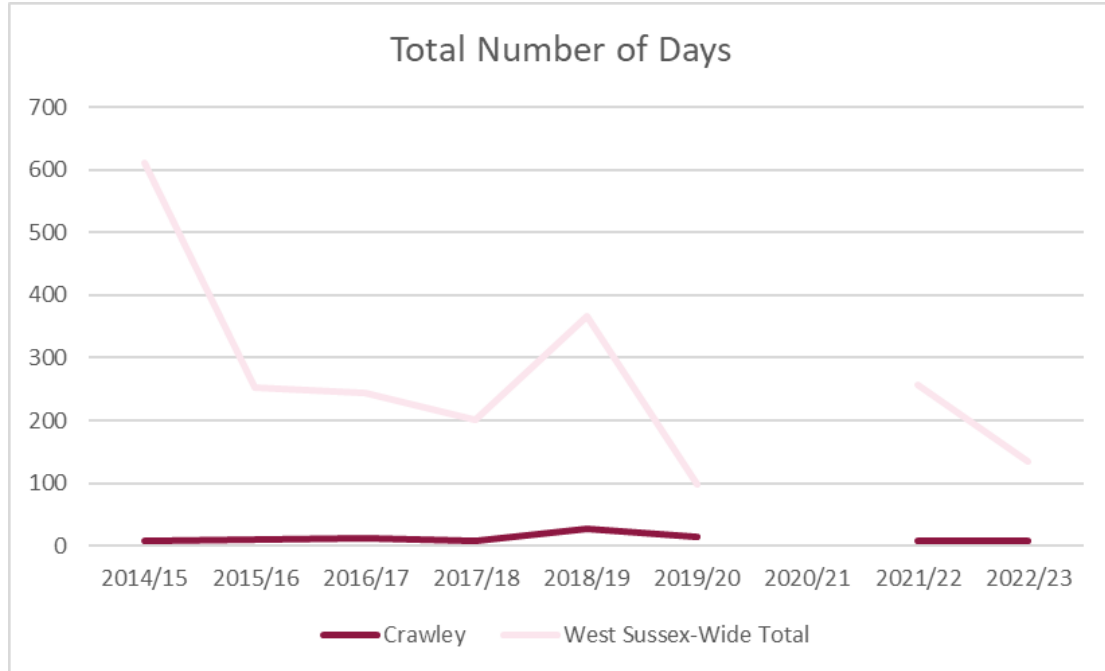
Figure 3: Total Number of Caravans (annual) on Encampments in Crawley & West Sussex 2015/16 – 2022/23, WSCC data



### Length of Time of Encampments in Crawley

The total number of days subject to encampments annually is low within Crawley, shown on Figures 4 and 5 below.

Figure 4: Total Number of Days of Encampments (annually) in Crawley & West Sussex 2014/15 – 2022/23, WSCC data



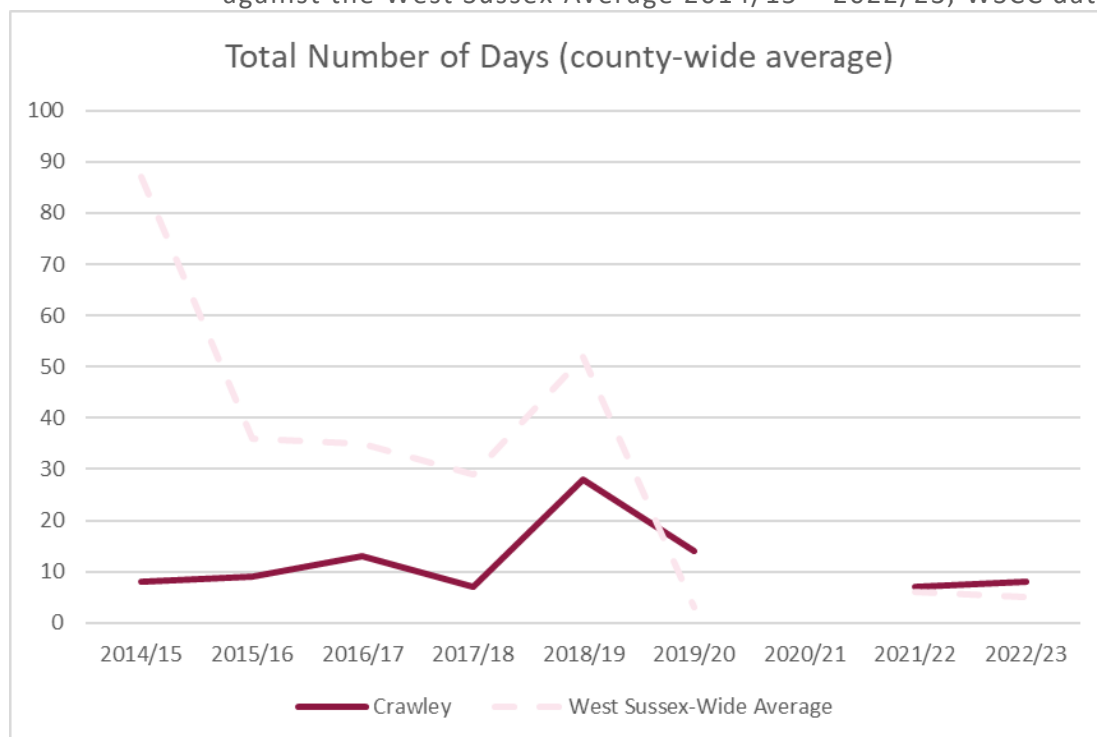
The length of encampments within Crawley is generally within single figures (between 7 and 9 days in total, for the years 2014/15, 2015/16, 2017/18, 2021/22 and 2022/23).

The highest number of days of total encampments in Crawley over this period, since the adoption of the Crawley Borough Local Plan 2015, was 28 days in 2018/19. This also reflects that year as the highest number of caravans recorded on encampments in the borough (99 caravans in total – see Figures 2 and 3 above) and mirrors the increase noted county-wide (referred to above in relation to Figure 1).

Notwithstanding the spike in 2018/19, overall, there has been a drop experienced over West Sussex, particularly from 2015/16 onwards. This can partly be explained by the establishment of the joint West Sussex transit site, located in Chichester, for use across the West Sussex authorities (discussed in more detail below under Transit Sites).

Figure 5 below shows the length of stay in Crawley encampments against the West Sussex average (total length of days divided equally by seven districts and boroughs).

Figure 5: Total Number of Days of Encampments (annually) in Crawley against the West Sussex Average 2014/15 – 2022/23, WSCC data



### Demand through the Housing Register Process

Based on the information provided by the applicant, the council currently has two active homeless applications from households where the primary applicant identifies as “White: Gypsy or Irish Traveller”<sup>4</sup>.

In addition, the council has one active housing register application from a household where the primary applicant identifies as “White: Gypsy or Irish Traveller”. This applicant is applying for social housing whilst residing in their existing (bricks and mortar) accommodation.

Since April 2018, CBC has had three homeless households apply where the primary applicant identifies as ‘White: Gypsy or Irish Traveller’ (one in 2021; one in 2022; and one in 2023).

According to the database, the council has had six housing register applications where the primary applicant identifies as ‘White: Gypsy or Irish Traveller’ (one in 2021; two in 2022; and three in 2023).

However, there has been no request for a Gypsy and Traveller pitch site through the council’s Housing Register process.

### Planning Application Data

There have been three planning applications relating to Gypsy and Traveller sites determined since the adoption of the Local Plan 2015, relating to two sites:

1. Application for the removal of the conditions relating to temporary and personal permissions, pursuant to application CR/2012/0456/FUL permitted in 2013, at Pullcotts Farm Nursery, Peaks Brook Lane, which was submitted in 2017 and permitted in 2018: CR/2017/0829/NCC.

<https://planningregister.crawley.gov.uk/Planning/Display/CR/2017/0829/NCC>

<sup>4</sup> This data has been collected by CBC since 1<sup>st</sup> April 2018.

2. Application for the material change of use of land to a Gypsy and Traveller Site for 2 pitches each with 3 caravans and associated operational development – retrospective, at Land East of Radford Farm, Radford Road, which was submitted in 2021: CR/2021/0243/FUL.

<https://planningregister.crawley.gov.uk/Planning/Display/CR/2021/0243/FUL>

3. Application for Variation of Conditions 1 (Temporary Permission), 2 (Approved Plans), 3 (Personal Permission) and 4 (Number of Static Caravans) pursuant to CR/2017/0829/NCC for change of use of land to Mixed Use to include stationing of caravans for residential accommodation, at Pullcotts Farm Nursery, Peaks Brook Lane, which was submitted in 2022 and is awaiting a decision: CR/2021/0941/NCC.

### [Planning Register - Crawley Borough Council](#)

#### [Radford Road Appeal Decision](#)

The Planning Application for the material change of use to the East of Radford Road Farm was refused by Crawley Borough Council, at its Planning Committee Meeting held on 30 November 2021, on the following grounds:

1. The development harms the landscape character and visual amenity of the North East Crawley Fringe landscape character area, as it does not relate sympathetically to its surroundings in terms of the prominent siting and urbanising layout, scale, massing, damage to landscape, poor detailing and materials; contrary to policies CH2, CH3, CH4, CH9, and H5 of the Crawley Borough Local Plan 2015-2030, the Urban Design SPD, the Green Infrastructure SPD and the NPPF.
2. The development and residential occupation of the Land is within an area which is safeguarded from development that would be incompatible with the expansion of Gatwick Airport to accommodate the construction of an additional wide-spaced runway and is therefore contrary to policy GAT2 of the Crawley Borough Local Plan 2015-2030, the NPPF and the Aviation Policy Framework 2013.
3. The Land is between the 57 and 60 decibel Gatwick Airport aircraft noise contours and would be in an area where, if an addition wide-spaced runway was provided at the airport it would be between the 69 and 72 decibel Gatwick Airport aircraft noise contours. The occupiers of noise sensitive development (residential) are subject to Unacceptable Adverse Noise Effects from a transport source that is harmful to quality of life and health, contrary to policies ENV11, CH3 and H5 of the Crawley Borough Local Plan 2015-2030.
4. The development has not demonstrated that the Sequential and Exception tests have been satisfied to demonstrate this "highly vulnerable" development is compatible at this location in Flood Risk terms. By reason of its siting, materials and a lack of flood water compensatory measures, it has resulted in a development within the Environment Agency Flood Zone 2 that would displace flood water and cause increased flooding off site to the detriment of nearby land owners/and house occupiers, contrary to policies ENV8 and H5 of the Crawley Borough Local Plan 2015-2030, the National Planning Policy Guidance - Flood risk and coastal change, and the Environment Agency Strategic flood risk assessment guide.

The application was granted permission following Appeal on 9 December 2022. However, it was subsequently quashed by the High Court on 14 February 2023, by consent on the grounds that the decision by the Planning Inspector was unlawful.

### Planning Application Summary

Both of the sites considered since the adoption of the Local Plan 2015 (Peeks Brook Lane and Radford Road) are located within the safeguarded land for Gatwick Airport future expansion, where a permanent permission would be contrary to Gatwick Airport Safeguarding.

They are also both situated within the unacceptable noise levels associated with Gatwick Airport noise contours (both existing and the potential future contours based on an additional southern runway).

Both of these sites are privately-owned by individual families. Therefore, the particular circumstances of these applications continue to confirm that there is not an immediate demand for a publicly run site within Crawley to meet the needs of the existing residents.

The Statement of Case to support the appeal application confirmed the families residing on the Radford Road site relocated to Crawley from a publicly run site in Kent where they had previously had a plot which they shared with their extended family. The families moved on to the site in April 2021 prior to securing planning permission. No requests to the borough council nor West Sussex County Council were made to request a pitch on a publicly owned site. As part of the appeal hearings, the applicants confirmed they would only be interested in a small family-sized site.

However, a potential need for suitable alternative sites would arise if the temporary permissions are not renewed/granted.

### The Initial 'Demand' Questionnaire Results (2014 Assessment)

From an estimated population of 30 families within Crawley, the following response rate for initial questionnaires was achieved.

Figure 6: Initial Questionnaire Gypsy & Traveller Households Response Rate

	No. of Gypsy and Travellers Households	No. of Travelling Showpeople Households
Data from Planning Department	2	1
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
Total Gypsy, Traveller and Travelling Showpeople households identified	Approx. 30	1

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. 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).

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 (2014 Assessment)

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 B) accordingly)<sup>5</sup> and asked them to take part in a follow-up interview. Whilst seven households confirmed that members of their household would wish to reside on a Gypsy and Traveller site within Crawley, only four were willing to be interviewed<sup>6</sup>.

#### 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 existing 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'<sup>7</sup>.
- 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 housing<sup>8</sup> within West Sussex as a whole and the Crawley GTAA interviews confirmed that depression and anxiety amongst the participants was common.

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<sup>5</sup> 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.

<sup>6</sup> In terms of the other three initial participants identified: one household has moved from their address, one household was not willing to be interviewed when approached and the last household was not contactable.

<sup>7</sup> See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG, Para 15.

<sup>8</sup> 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.



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 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 for a pitch site.

### 2023 Update

For the 2023 Update of the GTTS Accommodation Needs Assessment a further survey is to be conducted in summer/autumn 2023.

Crawley's Gypsy, Traveller and Travelling Showpeople population is relatively small, and the majority live within bricks and mortar accommodation. Given the reluctance to be interviewed, and not wishing to intrude on those families again, a light-touch survey is to be conducted through established contacts with the community. Advice is being sought within the borough council, WSCC and with the Traveller community groups.

The outcomes of this survey will feed into and be reported in the final version of this Assessment.

As part of the preparation for the Regulation 19 Submission Local Plan, a number of avenues to engage directly with the Travelling community within Crawley have been explored. This has included engaging with the WSCC Gypsies and Travellers Team Manager; liaising with internal CBC Community Development Team, Strategic Housing Team, and Crawley Homes; and seeking advice from Friends, Families and Travellers organisation.

As there is not a publicly run Traveller pitch site within Crawley, WSCC does not have any direct connections or contacts with families within the borough.

Through the council's internal departments, the Community Development Team are not aware of specific Traveller groups within the borough, nor are the Housing Team aware of anyone identifying as from Gypsy or Traveller heritage living within Crawley Homes properties. With constraints on data protection, it is difficult to know how the council would be able to find out where or how to contact Traveller families within the borough who live in private accommodation.

CBC has sought to contact Friends, Families and Travellers, which is a national organisation based in Brighton (by emails sent 18 April and 15 May 2023) following the recommendation of the WSCC Officer who hoped they would hold some local, Crawley-specific, connections which could be followed up. In addition, CBC shared the draft Accommodation Needs Assessment and draft Questionnaire for their comments and advice. Unfortunately, there has been no response received.

The council has prepared a questionnaire and cover letter which it will be sending to the Traveller families which are known through the planning system (Appendix I). This will invite them to engage with the council in the manner most appropriate to them and seek their input into this Needs Assessment.

Representations have been received through the Regulation 19 Consultation which are being considered further as part of this work (set out in Appendix H).

### The 15 Year Projection

#### 2014 Future Projections Calculation

The 2014 Needs Assessment applied a future projection rate to take account of the conclusions there was no identified 'need' for pitch provision whilst acknowledging

there may be a need in the future. This applied growth rates of 3% for Gypsy and Traveller families<sup>9</sup> to the total household level (including families in caravans and in bricks and mortar accommodation) over the Plan period. This was based on the average national estimates. It was considered to be unlikely that all households will form and need independent accommodation. Therefore, in order to account for a degree of pitch sharing that may take place in practice, a ratio of pitch sharing was assumed at a rate of 1:0.75.

Calculation:                3% of 30 households = 0.9  
                                  x 15 years = 13.5  
                                  x 0.75 = 10 pitches

Since no new family formations were expected from Travelling Showpeople over the life of the Local Plan (based on the family make-up of the three households within Crawley), no calculation was made regarding their growth rate at that stage.

#### 2023 Update to Future Projections

As the number of pitch requests for the 8-year period since the adoption of the Local Plan 2015 has been zero, it can be concluded that this calculation over-predicted the number of pitches required over the Plan period (2015 – 2030).

However, in light of the two existing sites without current planning approval and the homelessness and housing register records, it is considered there remains a potential future need for up to 10 pitches, allowing for some contingency and resilience including extending beyond the Plan period.

#### The Council's Approach

In the context of this GTAA, the council believes that there continues to be no immediate 'need' for additional Gypsy and Traveller sites.

The original information gathered for the 2014 Accommodation Needs Assessment is supported by the lack of any requests, over the 8-years since the adoption of the Local Plan 2015, for local pitch provision to meet the needs of emerging households within Crawley who wish to take up a travelling lifestyle, which would otherwise indicate that a need for a pitch site was emerging.

This includes consideration of the nature of the two sites subject to planning applications made in the time since the adoption of the 2015 Local Plan which have been for small family private sites from families moving into Crawley from outside of the county.

In addition, it is evidenced by the encampment data which highlights the brief and transient nature of the Gypsy and Traveller communities which have stayed within Crawley over the period since 2014/15, predominantly heading for coastal destinations, as well as the limited number.

Crawley borough is a particularly constrained borough, characterised by tight administrative boundaries around the Built-Up Area and subject to safeguarded land for Gatwick Airport, flooding, and aircraft and other transport noise. The draft Submission Crawley Borough Local Plan 2024 – 2040 only identifies sufficient land to meet 42% of all housing needs (5,030 dwellings out of a Standard Method Housing need of 12,080 dwellings over the draft Plan period 2024 – 2040). Therefore, it is strongly maintained by the council that, due to the Crawley's extremely limited opportunities for suitable sites for Traveller sites, it is not possible for the borough to take additional traveller needs from outside of the borough. This is regardless of

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<sup>9</sup> 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%.



whether these are formally requested or if these are through enforcement action or retrospective applications following illegal encampments or incursions.

However, in terms of identifying a future 'need' for Gypsies and Travellers, it continues to be held by the council that it is possible that there will be a net increase in the number of Gypsy and Traveller households in the borough over the Plan period.

As such, the potential future 'needs' of Gypsy and Traveller families both living within bricks and mortar accommodation and from the sites which have applied for temporary planning permission necessitate the continued allocation of a 'reserve' travelling site in the Local Plan. This will be supported by a criteria-based policy to determine planning applications for Gypsy, Traveller and Travelling Showpeople accommodation on other sites, should proposals be received by the council (Appendix I).

This planning policy position will be accompanied by a proactive corporate approach by the council (as described in Part B; Section 4 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 GTAA recognises that the scale of unauthorised encampments in Crawley is relatively small and as such the formal provision of a transit site is unlikely to be necessary with the information obtained. Furthermore, the physical land capacity constraints of the borough as a tight urban area with the land to the north significantly affected by noise associated with Gatwick Airport, renders the borough extremely challenging for finding a suitable site for such provision.

Instead a transit site has been established in Chichester district for use across the whole of West Sussex county. CBC is part of an agreement amongst the West Sussex authorities to provide a financial contribution towards the capital and revenue costs of its development, management and maintenance. As referred to above, the number of days of encampment across West Sussex substantially fell over the period when the transit site was established (falling from a total of 610 days in 2014/15 to 252 days in 2015/16, and continued to fall until 2017/18, with a slight increase experienced in 2018/19).

Information from WSCC highlighted the Transit Site Pitch Occupancy Levels for the period 2018/19 was 50%, compared to 58% for the same period last year. The site was very quiet from the beginning of November to the beginning of March, in particular, with an average of only two pitches being occupied each week.

## PART B: MEETING NEEDS

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## 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 demands with an aspiration to move onto sites.

Therefore, the council has sought and will in the future 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, such as space for parking touring caravans (please note that this question has already been asked in the Second questionnaire, see Appendix C).

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## 5. RESERVE SITE IDENTIFICATION

Whilst the surveys of those in bricks and mortar accommodation did not, and no information or requests have, so far, 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 two smaller sites) suitable to accommodate up to ten Gypsy and Travellers pitches is necessary to meet an emerging, potential future need.

Appendix F 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 safeguarding for future potential runway expansion, 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 substantial projected growth of the local population, it will not be able to meet objectively assessed 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 consider allocating Gypsy and Traveller sites only for 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, two option sites have been additionally scrutinised through the Sustainability Appraisal process and were 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 consultant's 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;
- Consultation on two alternative 'option' 'reserve' sites as part of the Additional Sites Consultation 2013, the summary of this is set out in Appendix E;
- Publication Consultation and Examination in to the Crawley Borough Local Plan 2015 – 2030 (November 2014 – November 2015);

- Early Engagement Public Consultation and Call for Sites for the Local Plan Review (July 2019);
- Initial Publication Consultation for the Local Plan Review (January 2020); and
- Additional Publication Consultation for the Local Plan Review (January 2021).

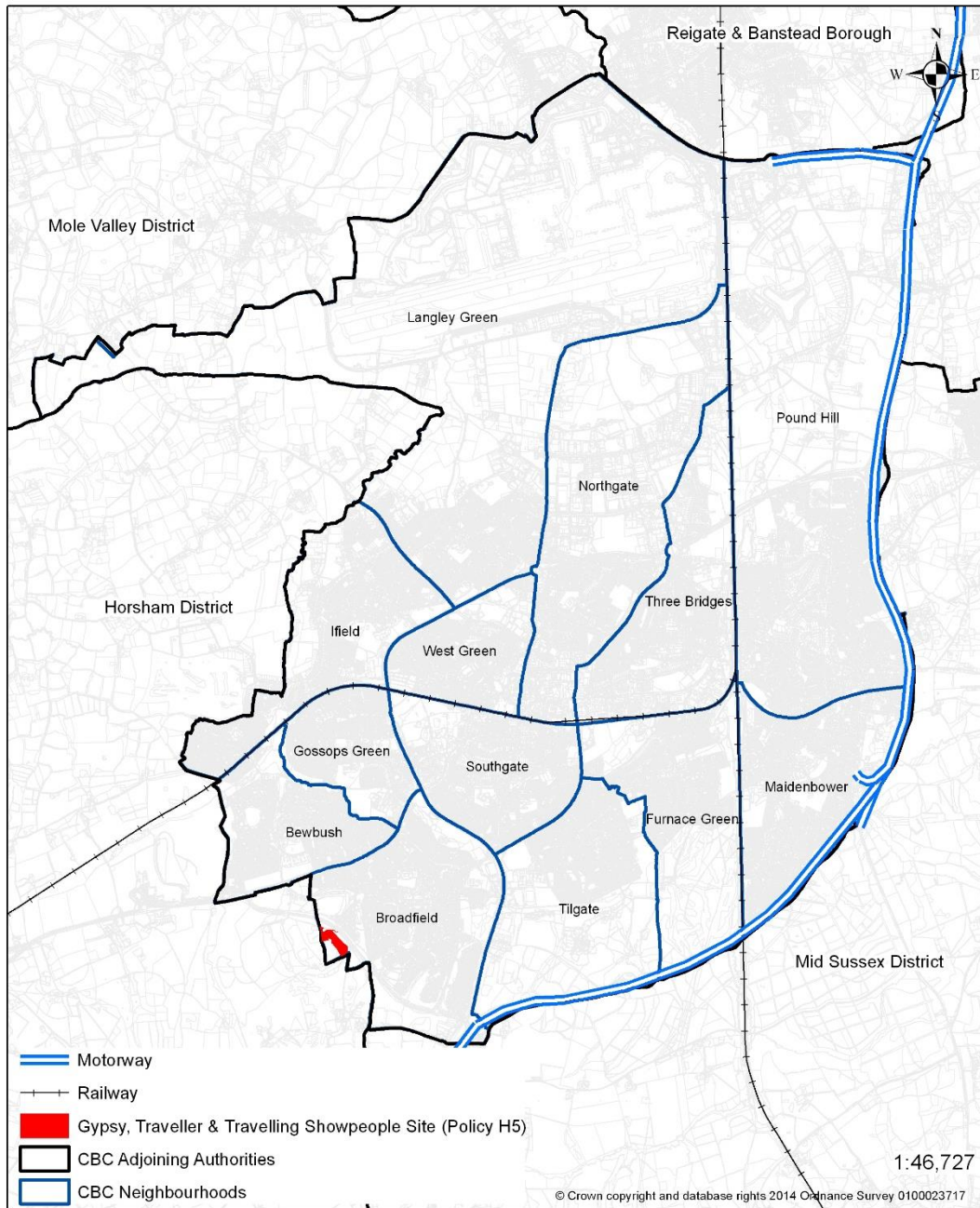
The conclusions of these assessments have indicated the extremely limited options available within the administrative boundaries of Crawley.

Nevertheless, a site was identified as reserve Gypsy and Traveller site for allocation in the 2015 Local Plan at the former Broadfield Kennels site. See Appendix G for more information on the process undertaken, and below for the site location maps.

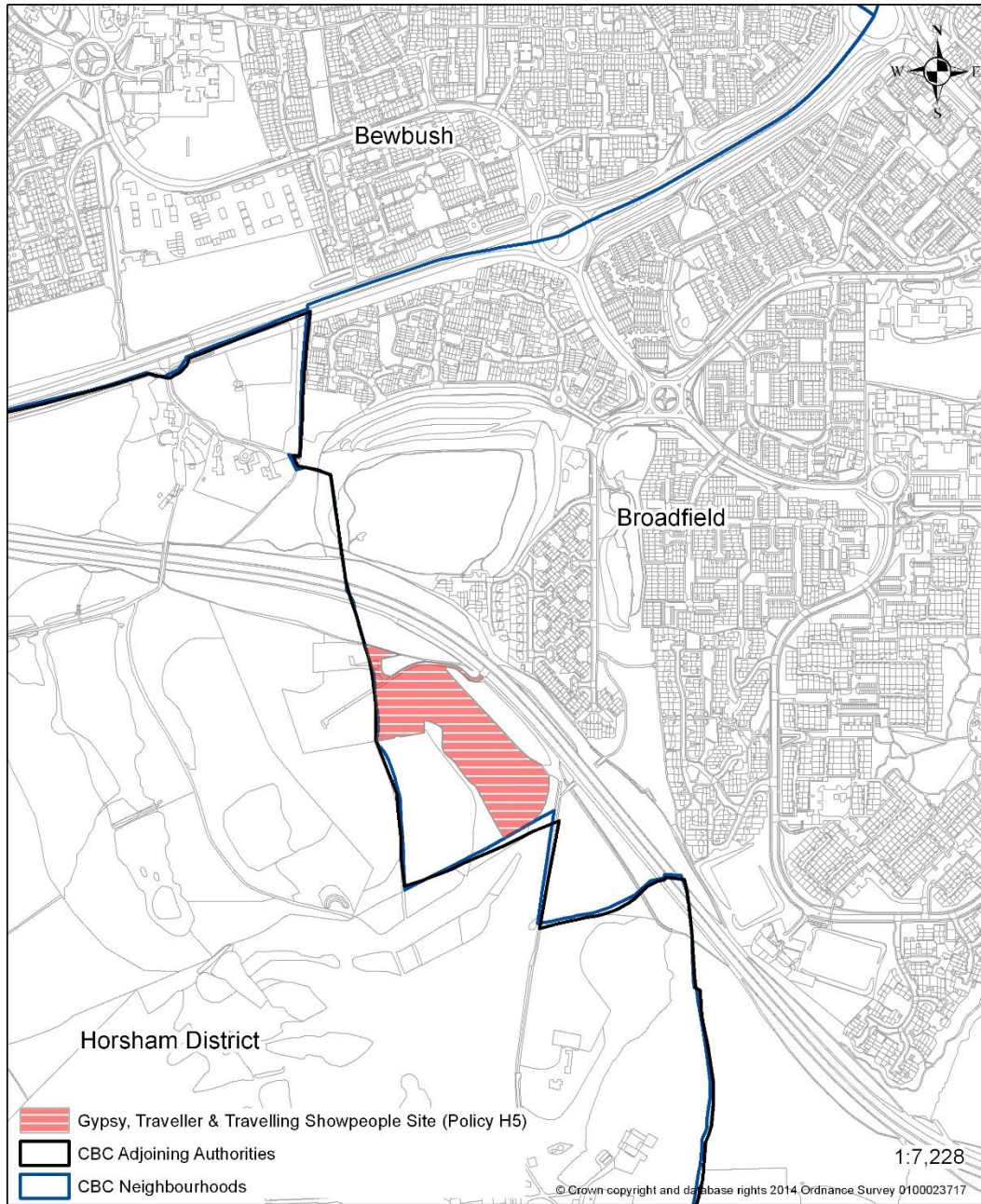
This site allocation has been continued through the process of the Local Plan Review. Comments received through the Review Local Plan process (Early Engagement July 2019 and Publication January 2020) are set out in Appendix I.

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### Broadfield Kennels Location Plan

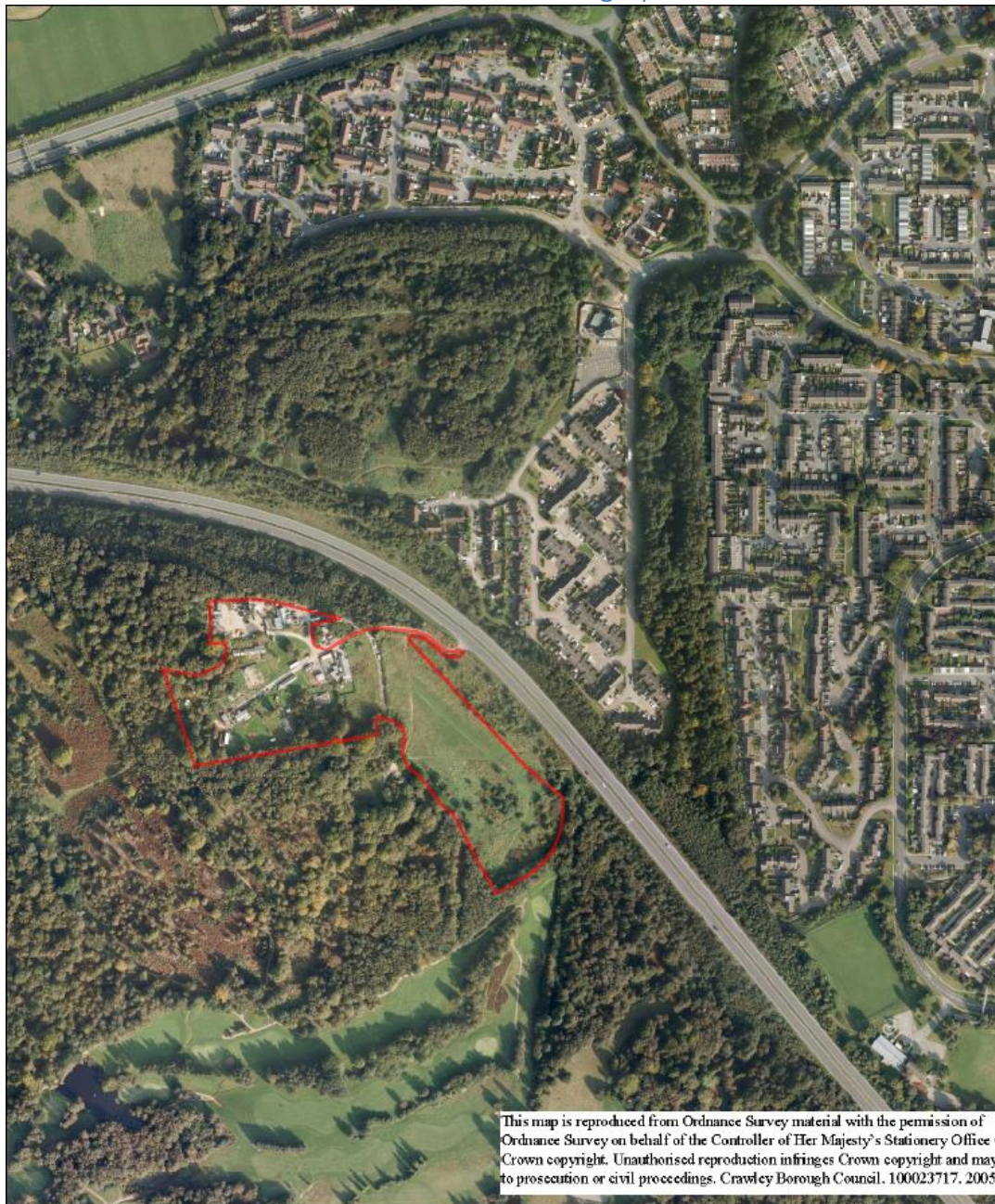








### Broadfield Kennels: Aerial Photograph Location Plan



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## 6. ALLOCATION POLICY FOR PITCHES

During the interview process, it was evident that all the households who participated, to varying extents, had 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 guidance<sup>10</sup>, 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.

Subsequently, 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. It is thought that 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.

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<sup>10</sup> See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG.

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## APPENDICES

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## APPENDIX A: WSCC ENCAMPMENT DATASETS FOR CRAWLEY 2014/15 TO 2018/19

### Number of Encampments

	<b>Crawley</b>	<b>West Sussex-Wide</b>
2014/15	2	115
2015/16	2	68
2016/17	6	72
2017/18	4	72
2018/19	8	90
2019/20	6	29
2020/21	8	
2021/22	1	45
2022/23	1	29

### Total Number of Days

	<b>Crawley</b>	<b>West Sussex- Wide Total</b>	<b>West Sussex- Wide Average</b>
2014/15	8	610	87
2015/16	9	252	36
2016/17	13	244	35
2017/18	7	202	29
2018/19	28	367	52
2019/20	14	98	3.4
2020/21	-		
2021/22	7	256	5.7
2022/23	8	135	4.7

### Total Number of Caravans

	<b>Crawley</b>	<b>West Sussex-Wide</b>
2014/15	7	471
2015/16	20	339
2016/17	32	448
2017/18	39	455
2018/19	99	609
2019/20	45	288
2020/21	-	
2021/22	2	281
2022/23	4	325



## APPENDIX B: INTIAL 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 C: SECOND GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMODATION NEEDS ASSESSMENT

### Gypsies and Travellers Interview Questions

<b>Name:</b>
<b>Address:</b>
<b>Date:</b>

#### 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?

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## APPENDIX D: FURTHER GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMMODATION NEEDS QUESTIONNAIRE 2023

### GYPSY, TRAVELLER ACCOMMODATION NEEDS QUESTIONNAIRE MODIFIED VERSION FOR THOSE BRICKS AND MORTAR RESIDENTS PREVIOUSLY INTERVIEWED 2023 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: ...../...../.....

Who is taking part in the 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 ( )

**You previously indicated a possible future need for a pitch site. Is this still the case?**

**Has the need been met elsewhere?**

**Do you have other family members living in the area?**

**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

**If you believe that you still need a permanent pitch within Crawley. Can you explain why you or your family require this?**

**When do you think you will need this?**

**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 E: SITE ANALYSIS SCORING MATRICES

**SCORING MECHANISM** The score sheets for each of the short-listed sites reflects a score out of 10 for each of the constraints identified by the council. This is based upon 0 being an ideal site in terms of the constraint and 10 being a totally unacceptable site.

Each of these scores is then weighted and the weighted score is provided and totalled for each site. A score is given for each of the three types of Gypsy/Traveller on each of the short-listed sites.

The weighting given to each criterion is shown on the final column on each score sheet. The same weighting applies to the criterion for each type of site and on each of the shortlisted sites.

	Emergency Stopping Place		Transit Site		Permanent Site		Weighting
	Score	Weighted Score	Score	Weighted Score	Score	Weighted Score	%
Noise							100
Flooding							100
Highways							100
Ownership							100
Health & Safety							100
Race							100
Visual & Environmental Impact							80
Water							60
Sewerage							60
Policies							60
Finance							50
Size							50
Neighbours							20
Terrorism							10
Facilities							10
Total							

## APPENDIX F: SITE CRITERIA FOR IDENTIFYING TRAVELLER SITES

### **Flooding**

Government advice confirms 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 Zone 3 should be excluded from further consideration.

### **Existing & Potential Access**

A preliminary assessment of access was made by the Strategic Planning Officer, and known issues with access on several sites have been considered. The cost and implications of any highway improvements will need to be considered in more detail in liaison with West Sussex County Council (WSCC), as the Highway Authority, to seek to find technical solutions and mitigation wherever possible.

### **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). For a GTTS site to be considered 'developable' for years six to ten of the Local Plan, the PPTS states that the site 'should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged' (PPTS, Para 9).

Owing to the existing land values of the majority of the sites within the borough, and 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 government policy, 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. Acceptable levels agreed have been incorporated into the criteria set out in Policy H8 of the Draft Local Plan. The assessment was based upon the Civil Aviation Authority's noise contours for both an existing single runway and potential two runway scenario.

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 overnight/short term temporary stay/transit sites should not be subject to existing or predicted air, road and/or rail noise in excess of 66 decibels.

- Proposals for longer term temporary/transit sites (allowing stay of up to one month) should not be subject to existing or predicted air, road and/or rail noise in excess of 60 decibels.

These figures are lower than for most bricks and mortar accommodation owing to the nature of GTTS accommodation and 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'<sup>11</sup> 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. The minimum number of pitches recommended for a site is 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 m<sup>2</sup> for each pitch has been established.

Consequently, the council has sought to assess sites that are above 0.1Ha (or 1000m<sup>2</sup>), 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.

### **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,

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<sup>11</sup> For the purpose of this assessment, a 'pitch' refers to only a Gypsy and Traveller site that provides for residential uses.

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. 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 adopted 2015 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 CH9 – Development Outside the Built-Up Area*

New developments must ensure the Crawley's compact nature and attractive setting is maintained; and recognise the individual character and distinctiveness and the role of the landscape character area or edge in which it is proposed.

#### *Policy H5 – Gypsy, Traveller and Travelling Showpeople Sites*

This policy outlines the criteria to be considered for any proposed new Traveller site, including the noise requirements as previously discussed and states that a site should not create a design and amenity impact that is incompatible with the surrounding area. The policy includes the site specific considerations for the 'reserve' site.

#### *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. A number of the Greenfield sites surrounding the borough's built-up area have significant planning policy issues that would need to be overcome.



## APPENDIX G: ADDITIONAL SITES CONSULTATION (JUNE/JULY 2013): 'RESERVE' TRAVELLER SITE OPTIONS

Two sites were identified for the purposes of public consultation to assist in the identification of a 'reserve' Traveller site to be allocated in the Local Plan:

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

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Additional Sites Consultation Questionnaire 2013 – Gypsy and Traveller  
Reserve Site Options Extract:

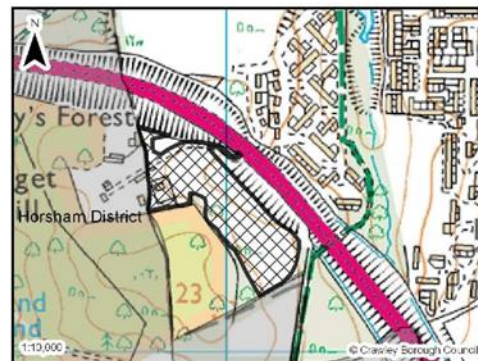
## Gypsy and Travellers

The Local Plan seeks to provide for the future needs of all people living in the town. Within Crawley we have a small group of Gypsy and Traveller families living in houses. Remaining in one place for a period of time allows people from this group to access education and health services, which is often not the case if they are travelling around the country. Talking to local families shows that generally they feel settled within the town. However, the Local Plan requires the council to make provision for the future needs of this group and there is a possibility that the children from settled families may need a fixed permanent site. To make sure we are able to provide for the future needs of families living in Crawley the Local Plan will need to set aside an area of land. The council is seeking views about which area of land should be set aside in case it is required. Two areas are being considered.

**Broadfield Kennels** is on the edge of the town. It has pedestrian links into Broadfield and it borders onto Buchan Park. Access off the A264 may be a problem. A small site within the area could accommodate 10 fixed pitches.

**Q9** Should land at Broadfield Kennels be set aside for a permanent fixed Gypsy and Traveller site if one is needed?

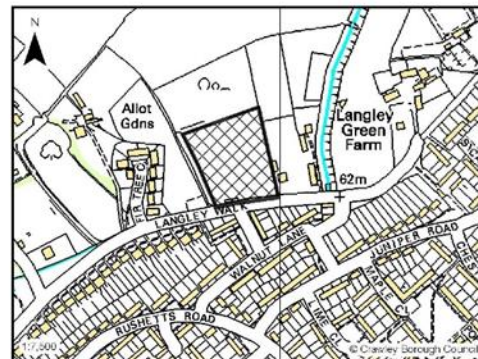
- Yes       No       Don't know



**Land north of Langley Walk** is on the edge of the neighbourhood. There may be some issues with noise levels from Gatwick Airport. The site could accommodate 10 fixed pitches.

**Q10** Should land north of Langley Green be set aside for a permanent fixed Gypsy and Traveller site if one is needed?

- Yes       No       Don't know



**Q11** Please use the space below to explain your thoughts and suggest any alternative sites you are aware of which may be suitable for a permanent Gypsy and Traveller site.

### Summary of Consultation:

#### 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. The area of the site considered for the 'Reserve' Traveller site lies wholly within Crawley borough.

Access to the site is off the A264 dual carriageway up a steep, poorly surfaced road. The site is generally level, extends to approximately two 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 to Broadfield Neighbourhood Centre.

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 further work is required to establish/confirm a workable arrangement to the satisfaction of WSCC and to establish how it will be funded.

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.

**Outcome of Consultation:** 72% of respondents said 'no' to the Broadfield Kennels site.

Respondents disagreed with the Broadfield Kennels site for three main reasons:

- 1) the perceived negative impact it would have on the neighbourhood both in terms of its reputation and the effect on property values;
- 2) the environmental impact it would have on the flora, fauna and wildlife within Buchan Park with some users indicating that they would stop visiting if a site were to be developed; and
- 3) users of Cottesmore Golf Club who were already experiencing vandalism thought that a site might exacerbate the situation. Comments regarding this issue were fewer in number compared to the other two issues raised.

#### 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 and is owned wholly by the council. The site is level and extends to approximately one hectare and lies outside of the mapped flood risk zone. It is also in close proximity to Langley Parade, Langley Green's neighbourhood centre. 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.

Vehicle access onto the site currently exists from Langley Walk. However, this would require substantial improvements to ensure it is acceptable for caravan access.

This site could only be considered acceptable in the short/medium term. 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.

**Outcome of Consultation:** 82% of respondents said 'no' to the Langley Walk site.

The main arguments against the Langley Walk site included:

- 1) poor road access;

- 2) noise levels would be too high particularly with its proximity to Gatwick Airport;
- 3) flooding was considered to be a problem for the site;
- 4) the site was not considered to be big enough to accommodate ten caravans. Respondents thought the Broadfield Kennels site was bigger;
- 5) the perceived negative impact it would have on the neighbourhood both in terms of reputation and the affect on property values; and
- 6) respondents also thought Broadfield Kennels was a better site because it was on the edge of town and slightly removed from the settled community which would cause less tension.

### Conclusions

On the basis of objections from Gatwick Airport to the allocation of the Langley Walk site, and the Airports Commission's decision to include the option of a wide-spaced second runway at Gatwick Airport in its further considerations of UK airport capacity, along with evidence provided by respondents to the Additional Sites Consultation which highlighted the extent of surface water and river flooding concerns with this site, it was considered unsuitable to take forward as an allocation for a reserve Traveller site in the submission Local Plan.

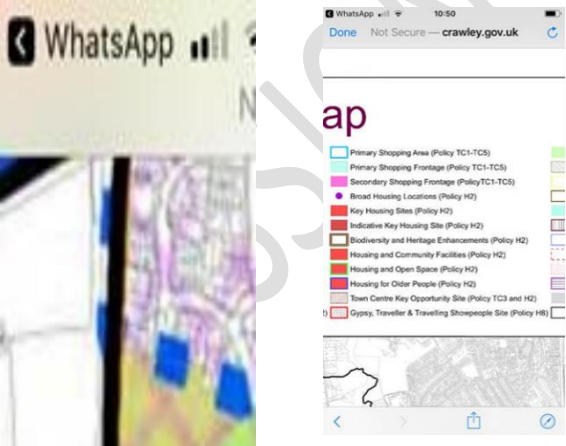
Objections were received from West Sussex County Council in relation to the Broadfield Kennels site and the implications on the SSSI and Buchan Country Park. Meetings were held to address these concerns. Amendments to the wording of the policy (see Appendix E) to strengthen the importance of the design of the site to have regard to assessment of character and ecological value of the site and mitigation measures to be put in place if required. These protection measures in the policy are felt to address many of the planning concerns raised by the local community in addition to the County Council.

The AONB designation does not preclude the designation of a Gypsy and Traveller site in the Local Plan, subject to ensuring the landscape and scenic beauty of the AONB as a whole is protected. The Broadfield Kennels site is partially brownfield and is well screened and secluded from other uses surrounding the site. The site is of sufficient size to allow for the layout of up to ten permanent pitch sites and provide additional screening if considered necessary at the detailed design stage. The policy ensures the requirements of the AONB Management Plan are satisfied.

The WSCC concerns regarding the highways access are known to be maintained by the Highways Authority. Wording in the policy has been included to ensure adequate highway access is achieved through agreed detailed design layout of the site, should a planning application be progressed in the future.

It is on this basis that the Broadfield Kennels site was progressed as an allocation in the adopted 2015 Local Plan for a reserve Gypsy and Traveller site for up to ten pitches, should a need arise from the community within Crawley over the Plan period. This allocation is continued through the Local Plan Review.

APPENDIX H: REPRESENTATIONS RECEIVED REGARDING POLICY H8: EARLY ENGAGEMENT JULY 2019;  
PUBLICATION JANUARY 2020; PUBLICATION JANUARY 2021; AND PUBLICATION MAY 2023

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP1/001	Resident 1	Policy H8	<p>Taking a look at the map attached to the new Local Plan Review, I note that the Council's plans to use the Buchan kennels Site as a permanent traveller site appear to remain in place. See screenshots below from the plan:</p>  <p>I have commented on this previously and will do so again now. There are three major reasons why this site should be discounted for this purpose:</p> <ol style="list-style-type: none"> <li>1. This site as you are aware is adjacent to an SSSI and is designated as AONB which should mark such a site out as being unsuitable for any development but particularly one</li> </ol>	<p>This site was allocated in the adopted Local Plan, following a long period of site assessments and evidence gathering. A thorough assessment of potential sites was undertaken previously and this clearly highlighted there were limited alternative opportunities (only one alternative was considered 'suitable' enough for public consultation in 2013, and was subsequently discounted due to noise and flooding matters).</p> <p>On this basis the allocation was found 'sound' by the Planning Inspector. No further evidence has been submitted to suggest this decision was flawed or that circumstances have changed to warrant the de-allocation of the site as part of the Local Plan Review.</p> <p>The adopted Policy establishes requirements for access, highways, and AONB. This policy wording is being retained through the Local Plan Review.</p> <p>The site is being retained as a "reserve site", which means the earliest anticipated point it would become available will be after the first five years of the new Plan period. There has been no indication that there is any immediate need arising from Crawley's existing Gypsy and</p>



Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>which will likely cause pollution of the land through the dumping of large quantities of industrial, work related and residential waste. Crawley has had to deal with the refuse left behind by travellers on many sites throughout the town over the years, but clearly if this is allowed to happen in this location, it will impact more than an open space used by residents (as has happened many times previously), it will impact upon the species and biodiversity of a naturally sensitive protected site, spoiling not only the AONB which is a designation given on the basis of <u>visual</u> amenity but also the SSSI site, as the Council do not have the means to police this area and prevent the local extinction of important and protected wildlife via continual fly tipping.</p> <p>2. Whether it is a rational reaction or not, it is unreasonable that residents from neighbouring estates' who make use of Buchan's wonderful natural resources should be subjected to that which I have outlined above and feel insecure in their use of the park due to the proximity of the travellers' site.</p> <p>3. Finally and most importantly, the current access to the site is inherently dangerous if not deadly, as to enter the site from this part of the A264, any vehicle has to slow down to 5mph on a 70mph blind bend and then navigate a steep twisting incline. Any vehicles attempting to leave the site have the equally lethal task of leaving from a steep incline facing in the wrong direction and accelerating from standing to 70mph as fast as possible to avoid a serious accident with any other road users. This is a major route for heavy haulage and goods vehicles too, which would certainly not be able to stop or swerve and could obliterate any vehicle attempting the above. My own wife passing the</p>	<p>Traveller population. However, a potential need may arise in the future from new households created by these families who chose to take up a travelling lifestyle. On this basis, the dates set out in the Policy have been amended accordingly.</p>

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>site entrance almost had a collision with a motorcycle, which coming down to the exit before joining the road was unable to stop in time. As the site stands it is inconceivable that vans with trailers and caravans could navigate such an entrance/exit safely and were it to be considered by the Council for a highway improvement scheme this would require huge change of infrastructure and cost implications in order to create an adequately safe entrance and exit. Not to mention the disruption to a major route whilst works are ongoing.</p> <p>In combination these 3 points clearly demonstrate that the use of this site is fraught with difficulty, potential danger and associated costs and it should therefore be discounted and an alternative sought by the Council.</p> <p>In closing I would add that I work for local government within the planning department, am a qualified Landscape Architect and have lived in Crawley pretty much my whole life, so I am not naive in my understanding of these matters and would ask the Council to consider the points I have made seriously.</p>	
REP3/003	Henry Smith MP	Policy H8	<p>I am emailing you today to raise objection to the above proposal which would allow construction of a traveller's site at Broadfield Kennels.</p> <p>Since the proposal went public I have had a number of constituents raise concerns over the negative impact to Broadfield, as well as surrounding neighbourhoods, and I agree that this site would not be in the best interests of local, Crawley, residents.</p> <p>I would be grateful if my objection could be formally logged.</p>	<p>This site was allocated in adopted Local Plan, following a long period of site assessments and evidence gathering. A thorough assessment of potential sites undertaken previously and this clearly highlighted there was limited alternative opportunities (only one alternative was considered 'suitable' enough for public consultation in 2013, and was subsequently discounted due to noise and flooding matters). On this basis it was found 'sound' by the Planning Inspector. No further evidence has been</p>



Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
				<p>submitted to suggest this decision was flawed or that circumstances have changed, to warrant the de-allocation of the site as part of the Local Plan Review.</p> <p>The adopted Policy establishes requirements for access, highways, and AONB. This policy wording is being retained through the Local Plan Review.</p> <p>The site is being retained as a “reserve site”, which means the earliest anticipated point it would become available will be after the first five years of the new Plan period. This is because the updated Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment maintains that there is still no immediate need arising from Crawley’s existing Gypsy and Traveller population, but that a potential need may arise in the future from new households created by these families who chose to take up a travelling lifestyle. On this basis, the dates set out in the Policy have been amended accordingly.</p>
REP155/522	West Sussex County Council	Policy H8	<p><b>Countryside</b> WSSC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows:</p> <p><b>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites:</b> WSSC welcome the stated aim in reasoned justification 12.110 that ‘The council will continue to search for and analyse the potential for alternative sites as factors</p>	Acceptance of allocated site noted.

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			change over the Local Plan period'. WSCC regard the current location of the potential settlement to not meet the set assessment criteria, as it is located within the High Weald AONB and outside the current Built-Up Area Boundary but have previously accepted it's inclusion after discussion with CBC providing appropriate mitigation stated is included in any planning application.	
REP174/632	Gatwick Airport Limited	Policy H8	<p><b>Policy H8 Gypsy, Travellers and Travelling Showpeople Sites</b></p> <p>Gatwick supports the need for the inclusion of a Policy which makes provisions for the allocation of a Gypsy Traveller and Travelling Show People Site. However, in its current form Policy H8 is considered by GAL to be in conflict with both Policy GAT2 Option 1 of the draft Plan and Policy EP4.</p> <p>GAL considers the noise exposure levels proposed in policy H8 (a) are unacceptably high and could result in adverse impacts on residents of such sites, particularly given that residential accommodation such as caravans cannot adequately be mitigated against noise exposure in the same way as bricks and mortar can be.</p> <p>In addition, GAL also seeks the removal of the final paragraph of the Policy H8 regarding the issuing of a temporary planning consent for sites predicted to be noise affected at some point in the future. GAL considers that such temporary consents could lead to difficulties securing the vacant possession of the land for the development of an additional runway (to the south) and which may compromise the timely delivery of a nationally significant infrastructure scheme.</p>	Noted. Draft Local Plan Policy EP4 and the accompanying Local Plan Noise Annex identify the Unacceptable Adverse Effect level as occurring at 60dB. Policy H8 identifies a cut-off of 57dB for permanent sites, and 60dB for long-term temporary sites. The noise exposure figure for long-term temporary (60dB) therefore matches that of Policy EP4, and also the approach of the Aviation Strategy which is based on the fact that there is no escape from the noise outside, so long-term temporary users are in the same position as that for housed individuals. The 57dB metric for permanent sites is below the 60dB metric, and therefore also protects the occupants. For temporary sites, the maximum exposure is 66dB. This figure is beyond the 60dB threshold at which noise exposure becomes unacceptable. However, the Unacceptable Adverse Effect level (66dB) recognises the negative health impacts associated with long-term exposure to noise, whereas users of a temporary site would only be exposed to this level of noise for a short time. The noise metrics identified in draft Policy H8 are therefore consistent with the approach of draft

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			<p><b>Supporting text of para 12.110</b>                      GAL supports the inclusion of supporting text para 12.110 regarding Broadfield Kennel and the identification of the potential future noise impacts from aircraft at the site.</p> <p><b>Supporting text of para 12.112</b>                      GAL strongly agree with supporting text of para 12.112 regarding exposure to noise from aircraft at proposed traveller, gypsy, showpeoples sites where sites in excess of 57 decibels on a permanent basis, 60 decibels for long term temporary sites of up to one month and 66 decibels for temporary site being unacceptable in terms of the adverse effects upon residents. However the noise limits identified in para 12.112 are confusing as they are also clearly in conflict with proposed Policy EP4 and the noise thresholds laid down in Table 1 of the Local Plan Noise Annex. Para 12.112 therefore needs further clarification.</p>	<p>Policy EP4 and the accompanying Local Plan Noise Annex.</p> <p>Paragraph 12.112 (now 13.46) has been amended to reflect the approach being taken by the draft Local Plan Review in removing safeguarding but requiring the Area Action Plan for the proper planning of this area.</p>
REP197/823	Reigate & Banstead Borough Council	Policy H8	<p><u>Gypsies, Travellers and Travelling Showpeople</u>                      Through our own Development Management Plan (DMP), we have sought to meet full need identified in our latest Gypsy &amp; Traveller Accommodation Assessment, including those households who meet the equalities definition but not necessarily the planning definitions within the Planning Policy for Traveller Sites. It is our expectation that our partners across Surrey and the Gatwick Diamond will seek to do likewise through their emerging Plans in order to ensure the needs of this group are properly planned for.</p> <p>The proposed allocations within our DMP, including provision on sustainable urban extensions, are capable of meeting our pitch and plot needs over the plan period in full; however, there is no surplus available to accommodate unmet needs from elsewhere.</p>	Support Noted.

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			We note the latest evidence that there is no immediate need for gypsy and traveller sites within Crawley, but that a need for 10 pitches later in the plan period is likely due to household formation. It is noted that the draft Plan proposes to meet this potential need in full through the allocation of a reserve site and we strongly support this positive approach to planning for future needs. We believe that it is important that this allocation is maintained to provide flexibility, particularly the plan acknowledges that local constraints result in <i>“limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward sites themselves”</i> .	

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Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/056	Gatwick Airport Limited	H8	<p><b>Policy H8: Gypsy, Travellers and Travelling Showpeople Sites</b> GAL object to Policy H8 as drafted. Gatwick supports the need for the inclusion of a policy in the draft Plan which makes provisions for the allocation of a Gypsy, Traveller and Travelling Show People Sites.</p> <p>However, Policy H8 as drafted is considered by GAL to be in conflict with both the national policy requirement to safeguard land around the airport, the Noise Policy Statement for England and the proposed Policy EP4 Noise of the draft Plan.</p> <p><b>GAL Comment:</b> GAL submit that any form of new residential accommodation and housing including Gypsy, Traveller and Traveller Showpeople sites should not be permitted (this objection extends to include</p>	<p><b>Criteria for Assessing other Proposals</b> Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site: a) is not subject to existing or predicted air, road and/or rail noise in excess of Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise. <del>57 decibels for permanent sites, 60 decibels for long term temporary sites up to one month, and 66decibals for temporary sites</del> ... [continue with other criteria ((b) to (f))]</p> <p><b>Reasoned Justification – Proposed Amendment Paragraph 13.46</b> 16.9 The supporting text at paragraph 13.46 would need to be updated in line with GAL’s comments on</p>

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			<p>granting of temporary permissions) on the land currently safeguarded by national policy for future airport expansion as this could compromise the expedient delivery of a nationally significant infrastructure scheme in the national interest. (<i>GAL provides significant details of the need for land to be safeguarded from incompatible forms of development such as housing in its representation objecting to Policy SD3</i>).</p> <p>In addition and central to GAL's objection to Policy H8 is that the noise thresholds for permanent and temporary Gypsy, Traveller and Traveller Showpeople sites, as proposed in Policy H8 point (a) are set at thresholds that are too high and as such will fail to ensure that the future sites will offer suitable living environments for the travelling community.</p> <p>The following noise criteria are identified in Policy H8 criterion (a):</p> <p><b>Gypsy, Traveller and Travelling Showpeople Sites</b></p> <table border="1"> <tr> <td><b>Permanent Sites</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;57dBA</td> </tr> <tr> <td><b>Long Term Temporary Sites (up to one month)</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;60dBA</td> </tr> <tr> <td><b>Temporary Sites</b></td> <td>Not permitted in locations exposed to existing or predicted noise levels &gt;66dBA</td> </tr> </table> <p>GAL is unclear about the distinction between 'long term temporary sites of up to one month' and 'temporary sites' but</p>	<b>Permanent Sites</b>	Not permitted in locations exposed to existing or predicted noise levels >57dBA	<b>Long Term Temporary Sites (up to one month)</b>	Not permitted in locations exposed to existing or predicted noise levels >60dBA	<b>Temporary Sites</b>	Not permitted in locations exposed to existing or predicted noise levels >66dBA	<p>the appropriate noise thresholds to be applied for traveller sites as follows:                  However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and exposure, even for short periods, can affect health. Therefore, in the interests of the health of inhabitants, sites will not be permitted if noise exposure would, during the lifetime of any permission, be in excess of 51 dBA Leq.</p>
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			<p>considers that the noise thresholds for any temporary site as is proposed in Policy H8 will lead to unacceptable impacts on occupants of any such sites. GAL's view is that the effects of noise on health and quality of life (for example sleep disturbance) occur from short term exposure as well as long term exposure.</p> <p>Policy EP4 of the draft Plan states new housing above the unacceptable noise level of Leq 60dB for aircraft noise should not be permitted. It goes on to say that new housing can be developed in noise levels above the Lowest Observable Adverse Effect Level (LOAEL) or Significant Observable Adverse Effect Level (SOAEL) 'where it can be demonstrated that a good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable'. Design measures to mitigate aircraft noise are available for new build housing, such as property sound insulation however, unlike 'bricks and mortar' housing, it is not possible to attenuate the noise in caravans, mobile homes and prefabricated accommodation to the same degree. This means that the noise thresholds need to be lower for such accommodation.</p> <p>The national policy position is to avoid significant adverse impacts from noise. It also explains that at noise levels from air traffic sources should be mitigated and reduced to a minimum to avoid such significant adverse effects. GAL therefore considers that Policy H8 should reflect this position and that new traveller sites should not be permitted above the LOAEL, which in government policy is Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise in order to ensure residents do not experience adverse effects from noise.</p>	

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REP/058	Reigate & Banstead Borough Council	H8	<p>Gypsies, Travellers and Travelling Showpeople                      RBBC note that CBC is currently in the process of updating its 2014 Gypsy &amp; Traveller Needs Assessment. We note that the current, 2014, Gypsy, Traveller and Travelling Showpeople Assessment identifies a potential need for up to 10 pitches and that this is the need that is currently being planned for in the Regulation 19 Crawley Borough Local Plan. We suggest that you may wish to consider the soundness of a proposed submission Local Plan policy “reserve” allocation, based on outdated evidence.</p> <p>We note that the 2014 study sought to meet the needs of the Gypsies, Travellers and Travelling Showpeople as defined in the National Planning Policy for Traveller Sites. The current National policy is from August 2015, postdating CBC’s current evidence on G&amp;T housing needs. Our DMP makes provision to meet the needs of households who meet the National Planning Policy definition of “Traveller”, and also those who meet the wider equalities definition, and those for whom it was unclear. We would therefore urge CBC to also seek to meet the needs of both definitions in order to ensure that the needs of this wider group are properly planned for in accordance with the public sector equalities responsibility.</p> <p>Should the updated G&amp;T needs assessment study identify a greater need for Gypsy, Traveller and Travelling Showpeople than that currently being planned for, in order for the plan to be “justified” based on an appropriate strategy, and therefore sound, further sites may need to be identified to meet this updated need, a process which would require Main Modifications to be made to the proposed submission plan.</p> <p>Whilst we note that proposed Policy H8 “Gypsy, Traveller and Travelling Showpeople Sites” allows windfall sites to come</p>	



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			<p>forward, subject to a criteria based approach, opportunities in the borough may be few given the land constraints and high land values.</p> <p>We appreciate the land constraints within CBC, however, we would like to reiterate that whilst our DMP has sought to meet our pitch and plot needs through site-specific allocations and as part of wider housing/ employment/ community development on our Sustainable Urban Extensions, there is no surplus available to accommodate any potential unmet needs from CBC.</p>	

Additional Publication Consultation: January 2021				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/056	Gatwick Airport Limited	H8	<p>53. We objected to this policy in the 2020 Reg19 DCLP. However, in view of the fact that the 2021 Reg19 DCLP reinstates a policy (Policy GAT2) to safeguard land for a second runway, we no longer object to this policy.</p> <p><b>Suggested Modifications:</b></p>	

Further Publication Consultation: May 2023				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/033 (2023)	Horsham District Council	H8	<p>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</p> <p>We support this policy in principle but consider that its effectiveness could be improved to reflect that need may arise across the housing market area, rather than just within Crawley Borough, which would justify the release of the site. Though the Horsham Local Plan is still emerging and an updated assessment of the need for pitches and plots is yet to be finalised, our emerging evidence suggests that it is unlikely that HDC will be in a position where we can identify how all of our needs for gypsy and traveller provision could be met. If such a circumstance were to</p>	

<b>Further Publication Consultation: May 2023</b>			
<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<p>arise, we would seek assistance from yourselves as we share a common housing market area, to meet any unmet needs. We will endeavour to provide clarity on this point as soon as we are in a position to do so.</p> <p><b>Suggested Modifications:</b>                      Change sought: It is considered that the words 'in Crawley' should be removed from the policy to reflect that need may arise elsewhere. Consequential changes to the reasoned justification should also be made for the same reason.</p>
REP/050 (2023)	Homes England	H8	<p><b>Policy H8: Gypsy, Traveller and Travelling Showpeople</b>                      Homes England is supportive of the ambitions and intention of draft Policy H8 as a whole, and indeed as part of the Land West of Ifield strategic allocation Homes England is fully committed to providing for a permanent Gypsy and Traveller site.</p> <p>It is noted that a similar policy position to aircraft noise set out in EP4 is adopted in draft Policy H8 (Gypsy, Traveller and Travelling Showpeople Sites) – albeit the UAEL at a lower limit of 57dB LAeq,16h. Consistent with our concerns with Policy EP4, this does not appear to be sufficiently justified and a more flexible approach should be considered. This is not <b>effective</b> as could limit the delivery of much needed Gypsy, Traveller and Travelling Showpeople Sites in the authority area / wider housing market area, nor <b>justified</b> as the sound levels adopted by Crawley Borough Council for the Significant Observed Adverse Effect Level (SOAEL) and the Unacceptable Adverse Effect Level (UAEL) within the Noise Annex are significantly lower than those in mainstream use for aviation noise, are out of step with national guidance.</p> <p>Furthermore, recent appeal and committee decisions, as set out in Appendix 1, provide evidence that this type of development can be accommodated and found acceptable beyond the 57dB contour where appropriate mitigation is applied and when considering sites on a case-by-case basis. In these examples, it can be demonstrated that acceptable living conditions can be achieved within Gypsy and Traveller homes beyond the 57dB contour, through various mechanisms and mitigation – for example by meeting the BS3632:2015 'Specifications for Residential Park Homes and Residential Lodges'. Furthermore, the Riverdale Farm appeal scheme in Mole Valley demonstrates where and Inspector has concluded that noise exposure is not necessarily perceptibly different and therefore unacceptable purely because the site is located beyond a 57dB contour line.</p> <p><b>Suggested Modifications:</b>                      On the basis of the above, Homes England considers that the current wording of Policy H8 is not justified nor sufficiently flexible to ensure future needs of the Gypsy and Traveller Community are met. There is an opportunity to introduce another assessment criteria to ensure that the policy is <b>positively prepared and justified</b>. Recognising the sensitivity of the community and their requirements compared to other occupiers, the proposed</p>

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			<p>additional criteria would introduce a sequential approach ensuring every attempt has been made to identify areas outside of the 57dB first, and only allowing development within it if no alternative sites are available and adequate mitigation can be demonstrated.</p> <p><u>Criteria for Assessing other Proposals</u>  <i>Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:</i></p> <p><i>a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary/transit sites of up to one month, and 66 decibels for temporary transit sites, or</i>  <i>b) is subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary/transit sites of up to one month, and 66 decibels for temporary transit sites, and it can be demonstrated that no suitable alternative sites exist outside of these noise contours; and any proposal is accompanied by a noise assessment demonstrating that the proposed site is adequately and appropriately protected from noise exposure in line with national policy and guidance. ...</i></p> <p><b>Appendix 1: Examples of permitted Gypsy and Traveller accommodation in proximity to airports</b>  <b>Local Precedent Examples</b>                      Below is a table detailing local precedent examples of Gypsy and Traveller sites which have been permitted within locations that are exposed to aircraft noise.</p>

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Stationing of 2 No. static caravans and two touring caravans, construction of hardstanding, parking for four vehicles, associated infrastructure and the keeping of horses.</td> <td> <p><b>Extract from Committee Report:</b></p> <p>"The plan below shows the noise contours arising from the aircraft movements at Gatwick Airport. The site is exposed to average day time noise levels between 57dBA and 60dBA and average night time noise levels between 51dBA and 54dBA.</p> <p>Gatwick Airport Limited take the view that the levels of noise, both during the day and at night would still be at levels that would be regarded as significant. Current national noise policy as set out in the NPPF and expanded upon further in the Noise Policy Statement for England (2010) is to 'avoid noise giving rise to significant adverse impacts on health and the quality of life' (NPPF paragraph 180). The government's Planning Practice Guidance advises that significant adverse effects should be avoided through, for example, the choice of sites at the plan-making stage, or by the use of appropriate mitigation such as altering the design and layout.</p> <p>As covered in paragraph 7.40 above, noise was an issue for consideration in the appeal at Riverdale Paddocks in Rusper Road Capel. The Inspector commented on this issue as follows:-</p> <p>"The site is crossed by the 57dBA noise contour around Gatwick Airport, and the caravans are now sited within that contour. Therefore, Gatwick Airport Limited has objected to the development in its current arrangement on the grounds that residents would experience unacceptable noise. However, it has nonetheless suggested it would be acceptable to relocate the caravans to the southern side of the site where they would be outside the contour.</p> <p>Based on what I heard on my visit, there is no appreciable noise difference between the northern and southern sides of this relatively small site. Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable."</p> <p>Taking into account this recent decision (June 2016) and the similarity in circumstances between that site and the current proposal, it is considered that refusal based on noise exposure to the occupiers would not be justifiable."</p> </td> </tr> <tr> <td>Riverdale Farm, Rusper Road, Capel, Surrey</td> <td>Mole Valley</td> <td>MO/2015/0768 APP/C3620/NW/15/3137675</td> <td>Refused. 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Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable."</p> </td> </tr> </tbody> </table> <p><b>Wider Precedent Examples:</b></p> <p>Below is a table detailing wider precedent examples of Gypsy and Traveller sites from across the county which have been permitted in locations that are exposed to aircraft noise.</p>	Scheme	Local Planning Authority	Application Reference	Status/ Decision Date	Net Pitches/ Description of Development	Comments	Land at Russ Hill, Charlwood, Horley, Surrey, RH6 0EL	Mole Valley	MO/2019/0741	Permitted 10/8/2020	Change of use of land to mixed use. Stationing of 2 No. static caravans and two touring caravans, construction of hardstanding, parking for four vehicles, associated infrastructure and the keeping of horses.	<p><b>Extract from Committee Report:</b></p> <p>"The plan below shows the noise contours arising from the aircraft movements at Gatwick Airport. 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			<p><b>Wider Precedent Examples</b></p> <p>Below is a table detailing wider precedent examples of Gypsy and Traveller sites from across the county which have been permitted in locations that are exposed to aircraft noise.</p> <table border="1"> <thead> <tr> <th>Scheme</th> <th>Local Planning Authority</th> <th>Application Reference</th> <th>Status/ Decision Date</th> <th>Net Pitches/ Description of Development</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>Land West of Skelton's Drove Beck Row Suffolk</td> <td>West Suffolk Council</td> <td>DC/22/0648/ FUL</td> <td>Permitted 24/3/2023</td> <td>Change of use of the land for provision of 18 pitches for Gypsy/ Traveller residential use; b. 18 dayroom buildings, with hardstanding for the siting of one static and one touring caravan on each pitch; c. vehicular access and associated parking; d. hard and soft landscaping scheme</td> <td> <p><b>Extract from Delegated Report:</b></p> <p>The site falls within the 72dB MOD noise contour with reference to aircraft noise.</p> <p>The main noise source the site is exposed to is flight noise from the nearby RAF Mildenhall. The application is supported by an Acoustic Report including a noise risk assessment and Acoustic Design Statement. A noise survey was undertaken over an 8 day period which established that the highest measured daytime level was 62dB L<sub>max,10</sub> and the highest night time was 51dB L<sub>max,10</sub>. The night time L<sub>max,10</sub> was taken as 66dB, all to the nearest decibel. At the façade of the proposed units a +3dB correction is applied.</p> <p>The initial site noise risk assessment was assessed as low to medium, according to Figure 1 of ProPG Planning and Noise. To achieve ProPG Noise level Guidelines mechanical ventilation. The reports advises that 'the static caravans would need to provide an overall sound insulation of at least 30dB. 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REP/056 (2023)	Gatwick Airport Limited	H8	<p>H8: Gypsy, Traveller &amp; Travelling Showpeople Sites</p> <p>63. We objected to this policy in the 2020 Regulation 19 DCLP. However, in view of the fact that the 2021 Regulation 19 DCLP reinstated a policy (Policy GAT2) to safeguard land for a second runway, we no longer object to this policy as amended provided that Policy GAT2 is retained.</p> <p><b>Suggested Modifications:</b></p>												
REP/113 (2023)	Natural England	H8	<p>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</p> <p>We support this policy's requirement for the site provision at Broadfield Kennels to ensure the requirements of the AONB Management Plan are satisfied.</p> <p>We also note that the site falls within the Sussex North WRZ, and as such should demonstrate water neutrality as appropriate. Our detailed comments with regard to water neutrality are set out within our comments for policy SDC4.</p>												

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<b>Ref. No.</b>	<b>Respondent</b>	<b>Policy/ Para</b>	<b>Comments</b>
			<b>Suggested Modifications:</b>
REP/138	Heine Planning Consultancy	H8	<p>see attached statement but in short:</p> <ul style="list-style-type: none"> <li>- need is not properly assessed.</li> <li>- over reliance on a reserved site that does not appear to be deliverable and would fail to address existing need. No efforts have been made to find more suitable sites since 2015.</li> <li>- criteria policy are not reasonable, fair and potentially offend Public Sector Equality Duty and PPTS</li> </ul> <p>Attached Supporting Document:  <u>Reserve site: Broadfield Kennels</u></p> <ol style="list-style-type: none"> <li>1. The Council rely on a reserve site at Broadfield Kennels to provide 10 pitches. This site has a dangerous access from a bend on the A264 with a steep incline to the allocated land. The examining Inspector is invited to drive past and judge whether it would be realistic to expect slow moving vehicles towing caravans to pull off/rejoin the A264 at this point without a deceleration/ acceleration lane and significant alteration to the gradient of the internal access road. I very much doubt this site would be deliverable without serious and major highway alterations the cost of which has never been made public. In my view it would certainly never be developed privately as the cost of highway improvements are likely to be prohibitive.</li> <li>2. It is not good enough for Crawley Council to argue, as they have done previously, that this 'reserve' site was found acceptable for the 2015 local plan. It was one of only two sites put forward and both attracted much opposition. It is not known if the previous Inspector viewed the site. The fact is the Council has failed to develop this site for 8 years and has been unable/ unwilling to explain how individual families with a need for a site in this district could acquire the land and develop it for themselves. I do not accept that it is developable or will be made available. The Council seems unwilling to even make it available to address the immediate need and appear to have no idea how it would be developed.</li> <li>3. The Council has had 8 years since 2015 to find a better site with a good prospect of being made available. The need in Crawley would appear to be for small private sites and not for one large site-as proposed. There is an immediate need for 2 extended families on two unauthorised sites: one English Gypsies and the other Irish Travellers. It would be unrealistic to expect these families to share the single reserve site at Broadfield Kennels. The reserve allocation is therefore totally unsuitable to address the immediate need though it might</li> </ol>

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			<p>serve as a socially provided site to address a general shortage, possibly for households stuck in housing or who have left the district due to the absence of provision.</p> <p><u>Criteria</u></p> <ol style="list-style-type: none"> <li>1. Criteria a will ensure new sites are not subject to unacceptable aircraft noise. Whilst in principal this requirement represents sound planning practice one has to question how committed the Council is to this policy given that they have failed since 2012 to make suitable alternative provision for a family with 3 households living in caravans on a site at Pullcotts Farm Nursery at the northern end of Peeks Brook Lane almost immediately under the flight path to Gatwick Airport and within the 60db night time noise contour and 66db day time noise contour. The 2021 Topic Paper did not even acknowledge the needs of this extended family. A 4 year temporary planning permission was granted 14 October 2013. An application was submitted in 2017 to renew consent and this was granted for a further 4 years until January 2022. In December 2021 a third application was made to renew consent and this is still awaiting a decision although the case officer emailed me in April 2022 to state that he had written it up for approval and was waiting for a manager to sign it off. The Council has been content to let an extended family live almost directly under the flight path for over 10 years whilst they fail to deliver the reserve site at Broadfield Kennels for this or any other families. Given a choice in the matter, the Martin family would prefer to remain on land they own and have lived on in their caravans since 2012, than relocate to a much larger site shared with other families with unknown management/ implementation costs. They are not troubled by aircraft noise.</li> <li>2. Criteria b would require the design and amenity impact of sites to be compatible with the surrounding area, particularly when located within residential areas or on land beyond the built up area boundary ie the countryside. If there is to be reliance on such a criteria Policy should at least explain where such development would be considered compatible. There is a real danger Criteria such as this will be relied on to thwart all new site provision (as is the case with the 2 pitch site at Radford Farm Road where issue was taken with a site largely screened by woodland, opposite housing and on land separated by a small field from a large sewage works with Gatwick airport structures/ railway line in more distant views). PPTS clearly envisages that Gypsy Traveller sites will be delivered outside settlement boundaries in the countryside and it is not a requirement that sites be hidden or only located on previously developed sites. It remains to be seen how the Council will develop a 10 pitch site within the AONB close to a country park at Broadfield Kennels without giving rise to an incompatible design and amenity impact with the surrounding area. The design of caravans sites means that they almost always be out of keeping within bricks and mortar properties in built up areas or result in some localised impact in less developed areas. I feel that this criteria could be worded more positively to ensure sites</li> </ol>

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Ref. No.	Respondent	Policy/ Para	Comments
			<p>are designed to assimilate into their surroundings rather than give objectors the perfect wording to object to every application-whether in a settlement boundary or beyond.</p> <p>3. Criteria d requires sites to be in a sustainable location but fails to explain what this means. Given the small size of Crawley I very much doubt any part of the district could be considered so isolated or remote from roads, services and facilities to be considered an unsustainable location and question if this criteria is really necessary. However the reserve site at Broadfield Kennels is probably about the most unsustainable location in the district. There is no pedestrian/ safe cycle route along the A264. It does not appear to be on any public transport route. It is not clear if access would be provided into Buchan Country park and then via a footbridge to the countryside centre and from there to the bus stop and shops at Bewbush. But it seems most likely that all journeys to/ from the site would have to be by car. With no right turn into the site off/ onto the A264 all journeys by car are extended up to/ back from the closest roundabouts.</p> <p>4. Criteria e requires that sites avoid undue pressure on infrastructure and community services. Given the very small need identified in the 2023 GTAA update is this criteria really necessary? The reserve site at Broadfield Kennels is for 10 pitches. If the 2023 GTAA update is to be believed, this would be greater than all existing pitches in the district yet is considered acceptable. As existing need is for small private family sites this criteria seems unnecessary from the outset.</p> <p>5. Criteria f states that proposed sites should meet an identified local accommodation need. This conflicts with para 24 (e) of PPTS which states that LPA should determine applications for sites from any travellers and not just those with local connections. I very much doubt that new housing in the district is restricted to local need and it would be most unfair to impose such a restriction on Travellers. This criteria offends the Public Sector Equality Duty. The Martin family at Peeks Brook Lane relocated from Wimbledon. The Casey family at Radford Farm Road relocated from near Maidstone in Kent. I have assisted families who have relocated from housing in Crawley to land outside Ruser (Capel Road) in Mole Valley due to the shortage of sites in Crawley. I do not recall Mole Valley Council objecting at the time to the fact they were addressing a need arising from outside their district. I strongly suspect that there remains a hidden need for more pitches for families who have been unable to live in Crawley, are living on rented pitches in adjoining districts e.g. Reigate, or have been forced to accept housing due to the absence/shortage of private/ socially provided sites in the district.</p> <p><u>Need for sites</u></p>



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			<p>1. Justification to Policy H8 refers to the 2020 GTAA and draft 2023 update which identifies a need for up to 10 pitches. These GTAAs are just an update of the 2014 assessment which was based on a small sample size. The updates have been done in house and assumes that household will have remained relatively unchanged.</p> <p>2. The July 2022 biannual caravan count records that Crawley have failed to submit a single count since January 2019.</p> <p>3. A 2021 topic paper stated as follows</p> <p><i>Gypsy, Traveller and Travelling Showpeople</i></p> <p><i>3.1.14 Notwithstanding the constrained land supply in Crawley, Duty to Cooperate agreements with the Gatwick Diamond Local Authorities confirmed the intention for each authority to seek to meet its own Gypsy, Traveller and Travelling Showpeople accommodation needs. As set out in the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, there is not an immediate need for new pitch or plot sites within the borough. However, there may be a need arising over the Plan period from the existing families within the borough as new households are formed. On this basis, the site allocated in the adopted Local Plan at Broadfield Kennels for up to 10 permanent residential pitch sites for Gypsy and Traveller use continues to be allocated for this purpose. There is no currently identified unmet need for Gypsies, Travellers or Travelling Showpeople arising from Crawley.</i></p> <p>This totally ignored the fact a site at Peeks Brook Lane had temporary consent</p> <p>1. The 2023 draft GTAA relies heavily on census data which is an indicator of Traveller population levels but is not usually relied on by those doing need assessments. The majority of households in Crawley live in housing and this has increased quite significantly since 2011. The 2023 draft GTAA notes that fewer than 50% of these households were interviewed. The Council state that there are 3 private Traveller sites with 6 households but only provides details where two of these are, fails to account for the location of 7 other caravans and notes that there is one showpeople site with 3 households.</p> <p>2. There is no authorised social site provision within Crawley. The only option is housing or private sites. The absence of social provision means it is even more important that provision for small private sites is made/ identified.</p>

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			<p>3. Submission policy H8 does not appear to acknowledge that there is an immediate need for sites. It refers to a reserve site for future need from Year 6. It states that on-going monitoring will ensure that 'any identified need .. is accommodated on the reserve site'. But it fails to state how the immediate need for pitches will be met.</p> <p>4. There is a current and immediate need for 3 households at Peeks Brook Lane and five households at Radford Road. If the need for 10 pitches is to be believed this would leave just 2 pitches for households from bricks and mortar (some of whom may also live in caravans in the grounds of their houses as on Balcombe Road), from other caravans on sites not identified, and from in migration. The 2023 draft GTAA states that in 2014 demand for sites was over estimated as there has been no request for a pitch site through the Council's housing register process. As there is no socially provided site in Crawley it is unclear why the Council think homeless Traveller families would apply for a site that does not exist. West Sussex CC confirmed August 2022 that they had 47 applicants who had applied for pitches on socially provided sites in the last 12 months in the County. There is clearly a need in the sub region.</p> <p>5. The draft GTAA helpfully lists planning application data since the 2015 local plan was adopted. It fails to point out that the Council has challenged the appeal decision letter for the Radford Rd site which was first occupied 2021. The Council are of the view the Inspector misunderstood the policy on aircraft noise when temporary permission was granted. The draft GTAA also omits any reference to the successful LDC application for a showman site at Fairhaven, Fernhill Road which authorised 2 additional mobile homes for residential use on a site which is in the same airport safeguarding zone as the Radford Rd and Peeks Brook Lane sites, and is also under the flight path to Gatwick airport where policy (existing and proposed) would not permit new residential development.</p> <p>6. Policy H8 states that the reserve site will be developable in years 6-15 ie 2029-2040. It will not be available to meet the immediate need including those with temporary permissions for up to 7 households. Broadfield Kennels has been a so called 'reserve site' since the 2015 Local Plan was adopted. The Council does not appear committed to addressing the immediate need in this district and is stalling for reasons that are not clear. As such the submission local plan is not legally compliant and fails to comply with the aims of national guidance in PPTs in respect of                      4b to ensure that LPAs develop fair and effective strategies to meet need through the identification of land for sites                      4c to encourage LPAs to plan for sites over a reasonable timescale                      4e to promote more private traveller site provision...                      4f that plan making and decision making should aim to reduce the number of unauthorised developments.                      4g for LPAs to ensure that their Local Plan includes fair, realistic and inclusive policies</p>

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			<p>4h to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.</p> <p>19. With reference to the section on plan making in the PPTS, Policy H8 fails to respect Policy B (10b) and the need to identify and update annually a supply of specific deliverable sites sufficient to provide a 5 years' worth of sites against their locally set targets. As footnote 3 explains, to be deliverable a site must be available now and achievable with a realistic prospect that development will be delivered on the site within 5 years. NPPF now has a more up-to-date definition for deliverable sites. Broadfield Kennels does not benefit from any planning permission and as noted above no costings or site schemes have been produced to show how it can be delivered.</p> <p><u>Summary</u></p> <p>20. I am not convinced the Council has adequately assessed the need for Traveller pitches with regard to sites with temporary consent, households in bricks and mortar (including Travellers living in caravans in associations with bricks and mortar) and in migration.</p> <p>21. There is an immediate need for sites which policy does not acknowledge or address. Two private sites do not have permanent consent and are in the airport safeguarding zone where they are also affected by aircraft noise. A third site for Showmen is also in the airport safeguarding zone and may have to be relocated if the planned expansion of Gatwick airport is ever implemented.</p> <p>22. It is questionable whether the so called reserve site at Broadfield Kennels is suitable, available and / or developable due to the feasibility and cost of improving the existing access off a dual carriageway (A264) and whether the Council is really committed to delivering this site. No effort has been made to bring this forward since 2015. The provision of a single 10 pitch site would fail to address the immediate need for small private sites. But it might be suitable for a new socially provided site if it is not considered an unsustainable location. It is however difficult to see how future residents would access the site other than by private vehicle.</p> <p>23. It is not clear what (if any) other potential site options were considered given the failure to progress the reserve site.</p> <p>24. The criteria proposed are not especially fair or proportionate, or consistent with PPTS. They should be drafted in a more positive, realistic and constructive way to help address need and not thwart future provision or offend the Public Sector Equality Duty.</p> <p>25. For the above reasons draft Policy H8 is not positively prepared or legally compliant. It fails to comply with the clear guidance in PPTS to assess and address need. Whilst the need in Crawley is relatively low, this is a</p>

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			<p>serious omission given the fact the 2015 Local Plan also failed to address need. At least one site has been occupied since 2012 with two temporary consents (with a third pending), and the Council does not appear to acknowledge or address this need in the submitted policy.</p> <p><b>Suggested Modifications:</b>                      see attached statement but in short -need for a proper GTAA not just an update of the 2014 GTAA with accurate data and better identification/ consultation with families living in Crawley, with allowance for in migration for households who have had to leave the district and are prevented from living here due the absence of provision - recognition that there is an immediate need for small private family sites -the criteria should be drafted in a way to facilitate not thwart new development, reflecting the small size of the district, existing constraints, the size and nature of the need. -need to identify small family sites that are deliverable.</p>

SUBMISSION DRAFT

## APPENDIX I: EXTRACT DRAFT LOCAL PLAN POLICY H8: GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITE

### **Gypsy, Traveller and Travelling Showpeople**

13.51 The Housing Act 2004 requires all local authorities to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople, take account of their needs in accommodation assessments, and outline how identified needs will be met. Furthermore, the National Planning Policy for Traveller Sites requires that local planning authorities make an assessment of their accommodation needs for the purposes of planning and to develop fair and effective strategies to meet this need through the identification of land for sites.

### **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites**

#### Site Provision

The following site is allocated on the Local Plan Map as a reserve Gypsy and Traveller site for up to ten pitches to meet the future needs of the existing population within Crawley. This site is considered to be critical to the delivery of future Gypsy and Traveller pitches in Crawley and is identified as being 'developable' in years 6-10 or 11-15 (2029/30 – 2039/40) of the Plan, dependent on when the 'need' arises.

- Broadfield Kennels, southwest of the A264

Acceptable development of this site will include adequate highway and pedestrian and cycle access being achieved, along with appropriate design, layout and landscaping to ensure the requirements of the AONB Management Plan are satisfied and the impacts of development adjacent to the country park are mitigated. Both the landscape character and ecological value of the Broadfield Kennels site will be assessed, and any harmful impacts will be adequately mitigated if required.

Ongoing monitoring of Gypsy, Traveller and Travelling Showpeople accommodation needs within Crawley will ensure that any identified 'need' for a Gypsy and Traveller pitch is accommodated on the reserve site.

#### Criteria for Assessing other Proposals

Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:

- a) is not subject to existing or predicted air, road and/or rail noise in excess of 57 decibels for permanent sites, 60 decibels for long term temporary/transit sites of up to one month, and 66 decibels for temporary transit sites;
- b) does not create a design and amenity impact that is incompatible with the surrounding area, particularly when located within residential areas or on land beyond the Built-Up Area Boundary;
- c) is not located in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- d) is in a sustainable location that reduces the need for long distance travelling, and to reflect traditional lifestyles, whereby some travellers live and work in the same location;
- e) avoids placing undue pressure on infrastructure and community services; and
- f) meets an identified local need for Gypsy, Traveller and Travelling Showpeople accommodation.

Where proposals are located in areas predicted to be noise affected at some point in the future, temporary planning permission may be appropriate.

### **Reasoned Justification**

- 13.52 *Crawley is a constrained urban environment and is in a position where difficult prioritisation of new development is required as the last undeveloped or underdeveloped sites are allocated for future uses. This situation results in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward site provision themselves. There are currently three authorised Gypsy and Traveller sites in Crawley, for six pitches in total, and one authorised site for Travelling Showpeople with three plots. The existing Gypsy, Traveller and Travelling Showpeople sites are all located within the land to the north of the borough. Two of the authorised Gypsy and Traveller sites are subject to temporary permissions, as this area is acknowledged to be unsuitable for permanent caravan accommodation, particularly due to the potential future southern runway expansion proposals for Gatwick Airport. In addition, there is a more substantial local population living within bricks and mortar accommodation.*
- 13.53 *The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020, and the emerging 2023 draft Assessment) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. This includes the families currently accommodated on the existing temporary permitted pitch sites. Furthermore, whilst the survey work completed for those in bricks and mortar accommodation did not identify any immediate need for additional sites, it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision.*
- 13.54 *This need will be met by the provision of a site at the former Broadfield Kennels, southwest of the A264. This site is located within the High Weald AONB and outside the current Built-Up Area Boundary (BUAB). Therefore, the site will need to be well planned and soft landscaped to ensure that the visual impact on the AONB is negligible and that the natural landscape is, where possible, positively enhanced. Mitigation measures for the potential impact on the natural environment will be sought where appropriate.*
- 13.55 *The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period, most critically in relation to the future expansion of Gatwick Airport. The council will continue to work cooperatively with its neighbouring authorities to maintain constructive joint working across the Gatwick Diamond.*
- 13.56 *In addition, this Policy also outlines the criteria upon which any other Gypsy, Traveller and Travelling Showpeople proposals will be assessed to ensure site provision occurs in locations that offer a suitable living environment for future inhabitants and protect existing neighbours from inappropriate development.*
- 13.57 *To deal with sites brought forward privately on unallocated land, land ordinarily considered suitable for housing development will be considered suitable for traveller accommodation subject to the proposal being compatible in design and amenity terms with the surrounding area, especially where proposals include employment based activities within their schemes. However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and the long term exposure to noise would affect the residents' health. Exposure to noise in excess of 57 decibels on a*

*permanent basis, 60 decibels for long term temporary sites of up to one month and of 66 decibels for temporary transit sites would not be in the long term interest of future inhabitants.*

- 13.58 *Should Gatwick Airport's proposals for an additional runway to the south of the existing Airport be brought forward, areas of the borough currently falling inside acceptable limits may become unsuitable in the future as noise contours migrate south into the built up area. For these areas, temporary permission may be an appropriate decision until certainty is achieved.*

SUBMISSION DRAFT

APPENDIX J: COVER LETTER AND UPDATED QUESTIONNAIRE  
(JULY 2023)

SUBMISSION DRAFT



## Economy and Planning

Contact name: xxx  
Email: xx.xx@ Crawley.gov.uk

Date: **Click to enter the date**  
Direct line: **01293 43\*\*\*\***



Name  
Address line 1  
Address line 2  
Address line 3  
Post code

Dear

As part of our Local Plan review the Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2023 (GTAA) is being updated, it assesses the requirement for pitches and plots within the borough and forms part of the evidence base for the Crawley Borough Local Plan Review (2024 – 2040).

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.

We are looking to engage with Gypsy and Traveller families within Crawley, to best understand their accommodation needs for both now and in the future. If you are able to help us best understand your needs, then there are a few ways that we can do this:

- We come to you at a convenient time for you;
- We phone you at a convenient time for you;
- You come to the Town Hall to meet us;

We want to engage with you in whichever way is best for you.

We have included a copy of the questionnaire with this letter to give you an idea of what questions would be asked if you are able to help.

If you are able to help and provide us with some information, then please contact: OFFICER, CONTACT DETAILS. We will then be in touch.

Many thanks,



Switchboard: 01293 438000  
Main fax: 01293 511803  
Minicom: 01293 405202  
DX: 57139 Crawley 1  
[www.crawley.gov.uk](http://www.crawley.gov.uk)

Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

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

**Site/Address:** .....

**Name:** .....

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

**Q1. ETHNICITY OF RESPONDENT (Please tick)**

- 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? (Please tick one)**

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

**Q4. IS THE PITCH / HOUSE SHARED WITH ANOTHER HOUSEHOLD(S)? (Please tick one)**

- Shared with 1 other household ( )
- Shared with 2 other households ( )
- Shared with 3 or more other households ( )
- Response not provided ( )

**Q5. DETAILS OF CURRENT ACCOMMODATION? (Please tick one)**

- 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) (Please tick the type of accommodation and the number of bedrooms)**

- House ( ) – How many Bedrooms 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? (Please tick one)**

- 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? (Please tick one)**

- Yes ( )
- No ( )
- Don't know ( )
- Response not provided ( )
- If so, when: .....
- Details:  
Number of pitches to become vacant .....
- Reason for pitch to become vacant .....

**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? (Please tick one)**

- 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* <i>Please select from the list below</i>	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 of the land that you would like to be considered:.....

**Additional Questions to Ask to Travelling Showpeople**

**Q13. IS THERE SUFFICIENT PROVISION AVAILABLE FOR STORAGE OF EQUIPMENT? (Please tick one)**

- 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  
MODIFIED VERSION FOR THOSE BRICKS AND MORTAR RESIDENTS  
PREVIOUSLY INTERVIEWED 2023  
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:** ...../...../.....

**Who is taking part in the interview?**

**Q1. ETHNICITY OF RESPONDENT**

Romany ( )

Irish Traveller ( )

Traveller ( )

Showman ( )

Circus People ( )

New Age Traveller ( )

Other ( )

*If "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)? (Please tick  
which box is most relevant)**

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 ( )

You previously indicated a possible future need for a pitch site. Is this still the case?

Yes ( )
No ( )
Unsure ( )
Any further comments

Has the need been met elsewhere?

Yes ( )

If yes where .....

No ( )

Unsure ( )

Do you have other family members living in the area?

Yes ( )

No ( )

**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* <i>Select from the list below</i>	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

**If you believe that you still need a permanent pitch within Crawley. Can you explain why you or your family require this?**



**When do you think you will need this?**

**MAYBE THESE ANSWERS COULD BE DATES**

Under 1 year ( )

1 – 2 years ( )

2- 3 years ( )

3+ years ( )

**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 of land:.....