

CRAWLEY BOROUGH COUNCIL

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

Draft: January 2021



DRAFT

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EXECUTIVE SUMMARY

- The 2011 Census confirmed that the number of individuals who identify themselves as 'White Gypsy or Irish Traveller' living within Crawley is 77. Currently, four Gypsy and Traveller households reside on two private sites in caravan accommodation. Three Travelling Showpeople households are located within the borough, sharing a single site. The future needs of these existing households are taken into account in the estimation of the potential future need which may arise from the current population.
- In Crawley, the majority of the travelling community population is known to be housed within bricks and mortar accommodation. These were the families addressed as part of the Accommodation Needs Assessment survey to understand the ranges of their issues, needs and aspirations.
- The population within Crawley are predominately Irish Travellers (69%) with the remaining Romany (31%).
- 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, 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. 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 2015 Local Plan identified the site as being 'developable' in years 6-10 or 11-15 (2020/2021 – 2029/2030) of the Plan, dependent on when the 'need' arises.
- Over the period since the adoption of the Local Plan (December 2015 – July 2020), no information or requests have come forward to indicate there is an immediate need for this site to come forward.
- The Local Plan is currently being reviewed, this includes the continued allocation of the 'reserve' site for accommodating up to ten pitches for Gypsies and Travellers, should a need arise in the new Plan period (2021 to 2037). As with the adopted Plan, it is considered this site is 'developable', for availability in years 6-10 or 11-15 (2026/2027 – 2036/2037) 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 (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 (2021 – 2037). The GTAA was conducted by Crawley Borough Council.

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)¹ 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 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.

¹ 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

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 definitions² will apply:

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

The National Planning Policy for Traveller Sites goes on to confirm, in the Annex, that in determining whether persons are "Gypsies and Travellers" for planning policy, consideration should be given to the following issues, amongst other relevant matters:

- a) whether they previously led a nomadic habit of life;
- b) the reasons for ceasing their nomadic habit of life;
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

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 as defined in the National Planning Policy for Traveller Sites (PPTS), DCLG, 2015, Annex 1

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 2011 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 five years.

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.

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

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.

Due to the circumstances of the Review, including the restrictions created around COVID-19, it was not possible to undertake further survey or face-to-face interviews. However, qualitative information was sought from 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 (as concluded from the data for unauthorised sites, encampments and incursions along with the information from the initial questionnaire);
 - Need for site provision within Crawley (as concluded from the additional questionnaire and assumptions into future needs assessment).
- Part B: Meeting Needs
 - Taking forward the conclusions of the Accommodation Needs Assessment.

As part of the preparation for the adopted 2015 Local Plan, 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 (Appendix D and E). Comments which were received as part of this consultation, accompanied by the council's officer responses, are summarised in Section 5 and can be found, in full, in the 2015 Local Plan Statement of Consultation³ and a summary extract is set out in Appendix F.

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..."*⁴

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

The Local Plan Review process, including Calls for Sites; the formal public consultation periods; and the Sustainability Appraisal/Strategic Environmental Assessment, did not highlight an alternative site which could be considered, nor did it raise any further 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 existing policy wording.

On this basis, the allocation has been taken forward into the Review Plan and is set out in Policy H8 of the draft Local Plan Review (Appendix G).

³ 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>

⁴ 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>

3. DATA ANALYSIS AND RESULTS

Gypsy, Traveller and Travelling Showpeople Population within Crawley

The 2011 Census confirmed that there are 77 individuals within Crawley who have identified themselves as 'White Gypsy or Irish Traveller', with the largest concentration of the GTTS community living in the Langley Green neighbourhood.

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

Currently in Crawley, four Gypsy and Traveller households reside on two private sites in caravan accommodation. Both 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.

Information provided by West Sussex County Council Communities Commissioning Directorate indicated that an estimated 30 Traveller families reside within Crawley. National guidance confirms that Gypsies and Travellers, and their children and other relatives, in bricks and mortar housing may form part of the source from which future site need may arise.

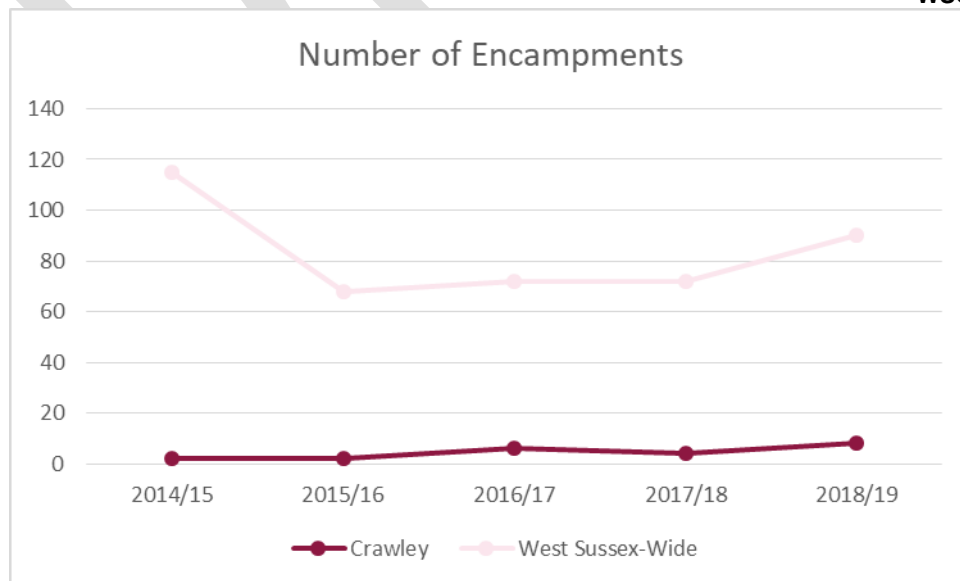
Demand from Unauthorised Traveller Sites and/or Encampments

The number of illegal incursions 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.

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.

Figure 1: Number of Encampments (annually) in Crawley & West Sussex 2014/15 – 2018/19, WSSCC data



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.

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).

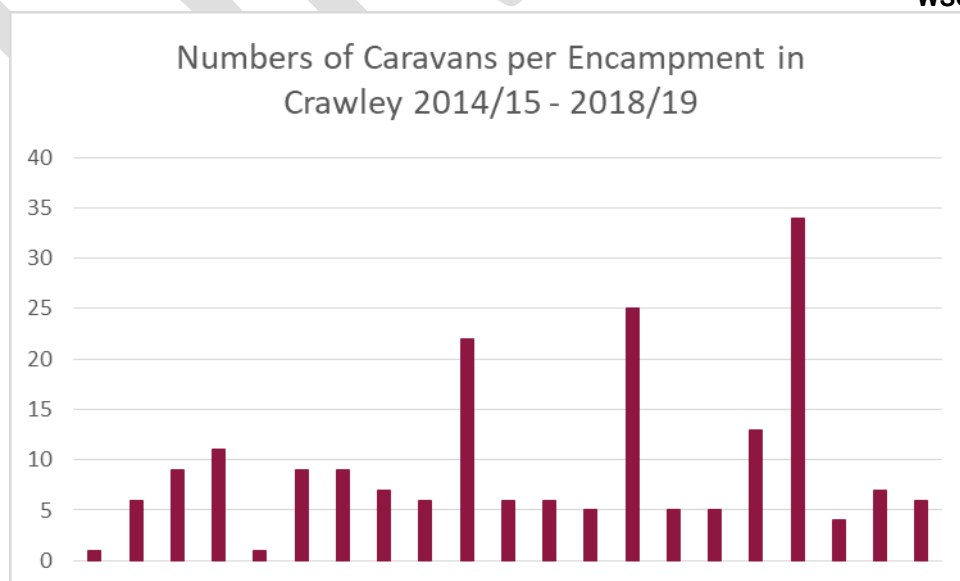
Location of Encampments within Crawley:

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.

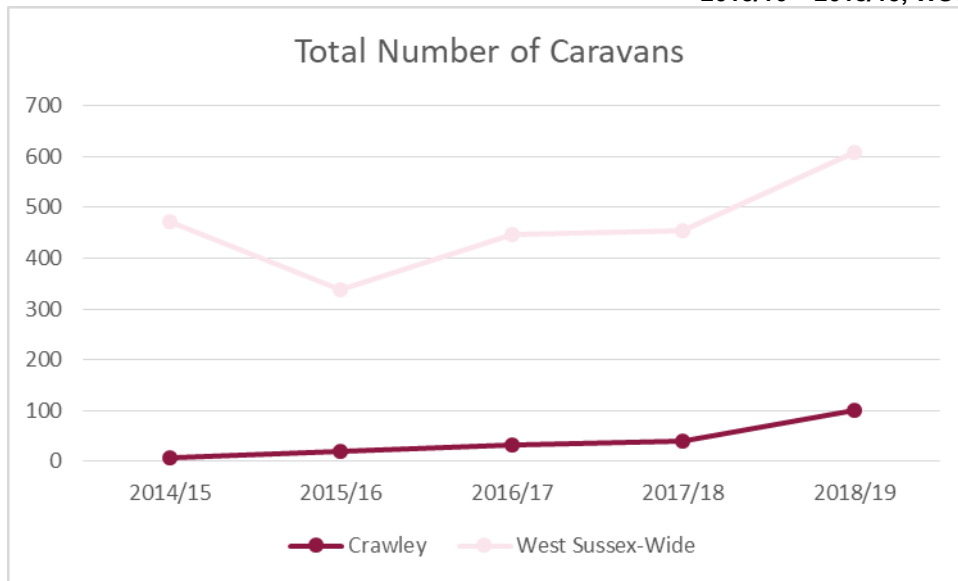
Figure 2: Number of Caravans per Encampment in Crawley 2014/15 – 2018/19, WSCC data



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).

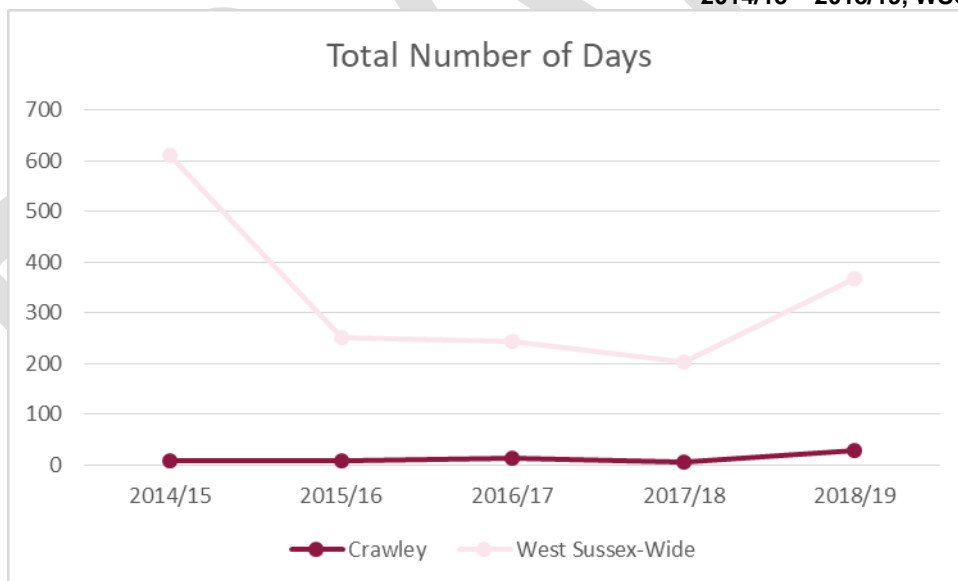
Figure 3: Total Number of Caravans (annual) on Encampments in Crawley & West Sussex 2015/16 – 2018/19, WSCC data



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.

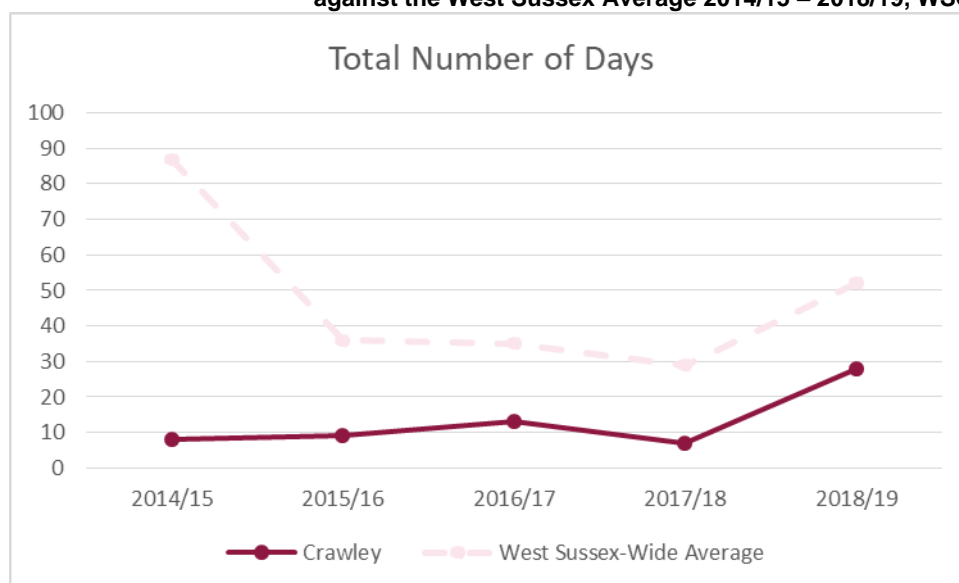
Figure 4: Total Number of Days of Encampments (annually) in Crawley & West Sussex 2014/15 – 2018/19, WSCC data



The drop experienced over West Sussex, particularly from 2014/15 to 2015/16, 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 – 2018/19, WSCC data



Demand through the Housing Register Process

Based on the information provided by the applicant, the council hasn't recorded anyone who identifies as Gypsy/Traveller on the homeless database⁵. Whilst no-one applying as homeless identified as a Gypsy or Traveller, this does not necessarily mean that no Gypsies or Travellers applied, as they may have chosen not to identify as such in their application.

The council no longer collects specific data on Gypsy and Traveller populations through the Housing Register and is, therefore, unable to provide information regarding housing register applications or re-housing of this specific group.

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

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

Planning application data

There were two planning applications relating to Gypsy and Traveller sites which have been determined since April 2013:

1. Application for the retrospective change of use for the stationing caravans for residential accommodation, and some additional buildings, at the land to the rear of Pullcotts Farm Cottages, Peaks Brook Lane, which was submitted in 2012 and permitted in 2013: CR/2012/0456/FUL

<https://planningregister.crawley.gov.uk/Planning/Display/CR/2012/0465/FUL>

⁵ This data has been collected by CBC since 1st April 2018.

2. Application for the removal of the conditions relating to temporary and personal permissions, pursuant to the above permission, which was submitted in 2017 and permitted in 2018: CR/2017/0829/NCC.

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

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)⁶ 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 interviewed⁷.

⁶ 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.

⁷ 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.

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'⁸.
- 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 housing⁹ within West Sussex as a whole and the Crawley GTAA interviews confirmed that depression and anxiety amongst the participants was common.

Notwithstanding the very real issues which the survey highlighted, the interviews did not identify a specific and immediate 'need' for travelling accommodation when judged against government guidance. There are instances where there is a concern that cultural traditions may be lost in the next generation, where families are experiencing difficulties 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.

2020/21 Update

For the 2020/21 Update of the GTTS Accommodation Needs Assessment a further survey has not been conducted. The survey undertaken for the 2014 Assessment was relatively recent and, therefore, the family situations of those interviewed are unlikely to have changed. Crawley's Gypsy, Traveller and Travelling Showpeople population is relatively small, and the majority live within bricks and mortar

⁸ See Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, DCLG, Para 15.

⁹ 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.

accommodation. Given the reluctance to be interviewed, and not wishing to intrude on those families again, a light-touch survey was intended to be conducted through contact with the community. Unfortunately, the restrictions associated with the COVID-19 crisis has prevented that.

The 15 Year Projection

To take account of the current position which has concluded there is no identified 'need' for pitch provision, but acknowledging there may be a need in the future, growth rates of 3% for Gypsy and Traveller families¹⁰ will be applied to the current total household level (including families in caravans and in bricks and mortar accommodation) over the Plan period. This is based on the average national estimates. It is unlikely that all households will form and need independent accommodation. In order to account for a degree of pitch sharing that may take place in practice, a ratio of pitch sharing has been assumed at a rate of 1:0.75.

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

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

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.

As explained above under 2020/21 Update, this is based on the original conclusion in 2014 that none of the interviews with the GTTS population have identified a genuine 'need' and that these results could reasonably be assumed as the position across the travelling community living in bricks and mortar accommodation within Crawley currently, particularly because the other families did not choose to take part in the interview process which gave them an opportunity to express their needs.

This original information is further supported by the lack of any requests, over the first five years of the adopted Plan, 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 that the only planning application made in the time since the adoption of the 2015 Local Plan has been the renewal of an existing temporary permission, and no additional applications from any new Gypsy, Traveller or Travelling Showpeople for permanent pitch sites have been made.

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.

However, in terms of identifying a future 'need' for Gypsies and Travellers living within bricks and mortar accommodation, it is still accepted that the locally generated evidence provided by the original survey work undertaken for the 2014 Assessment cannot be taken as conclusive, particularly as it was not possible to update this piece of work through the Review at this time.

¹⁰ 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%.

Therefore, it continues to be held by the council that it is likely 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 future 'needs' of Gypsy and Traveller families living within bricks and mortar accommodation will 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 against should they be received by the council (Appendix F).

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

The GTAA recognises that the scale of unauthorised encampments experienced in Crawley is relatively small and as such the formal provision of a transit site is unlikely to be necessary 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 reduction in 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 last year, 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

DRAFT

DRAFT

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).

DRAFT

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 D 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:

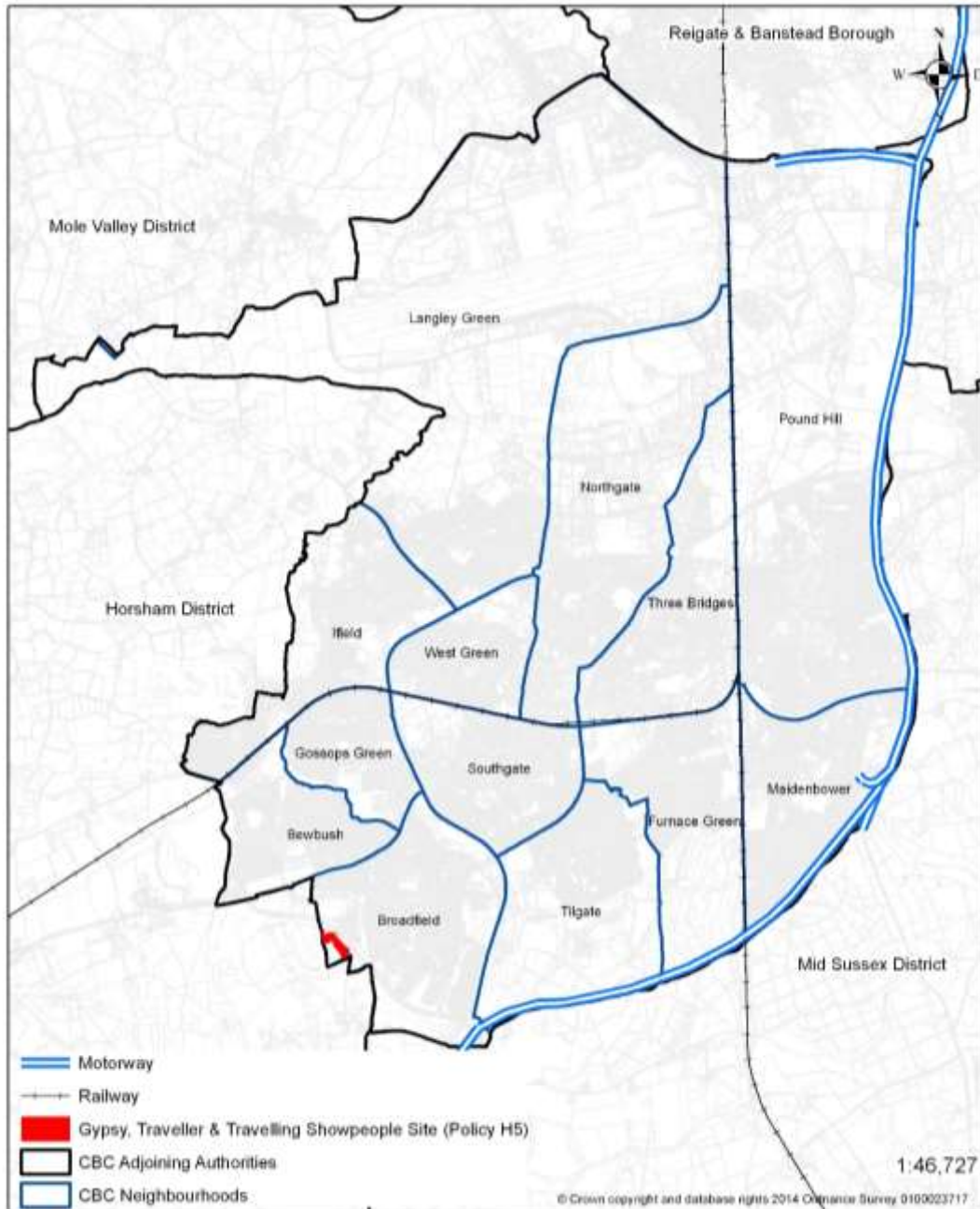
- an initial council assessment in 2004;
- followed by a consultant's assessment of 29 separate sites (September 2004);
- community consultation on sites in 2005;
- Consideration of sites following the 2005 consultation during 2006;
- General 'call for sites' as part of 2009 Core Strategy Review consultation;
- 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); and

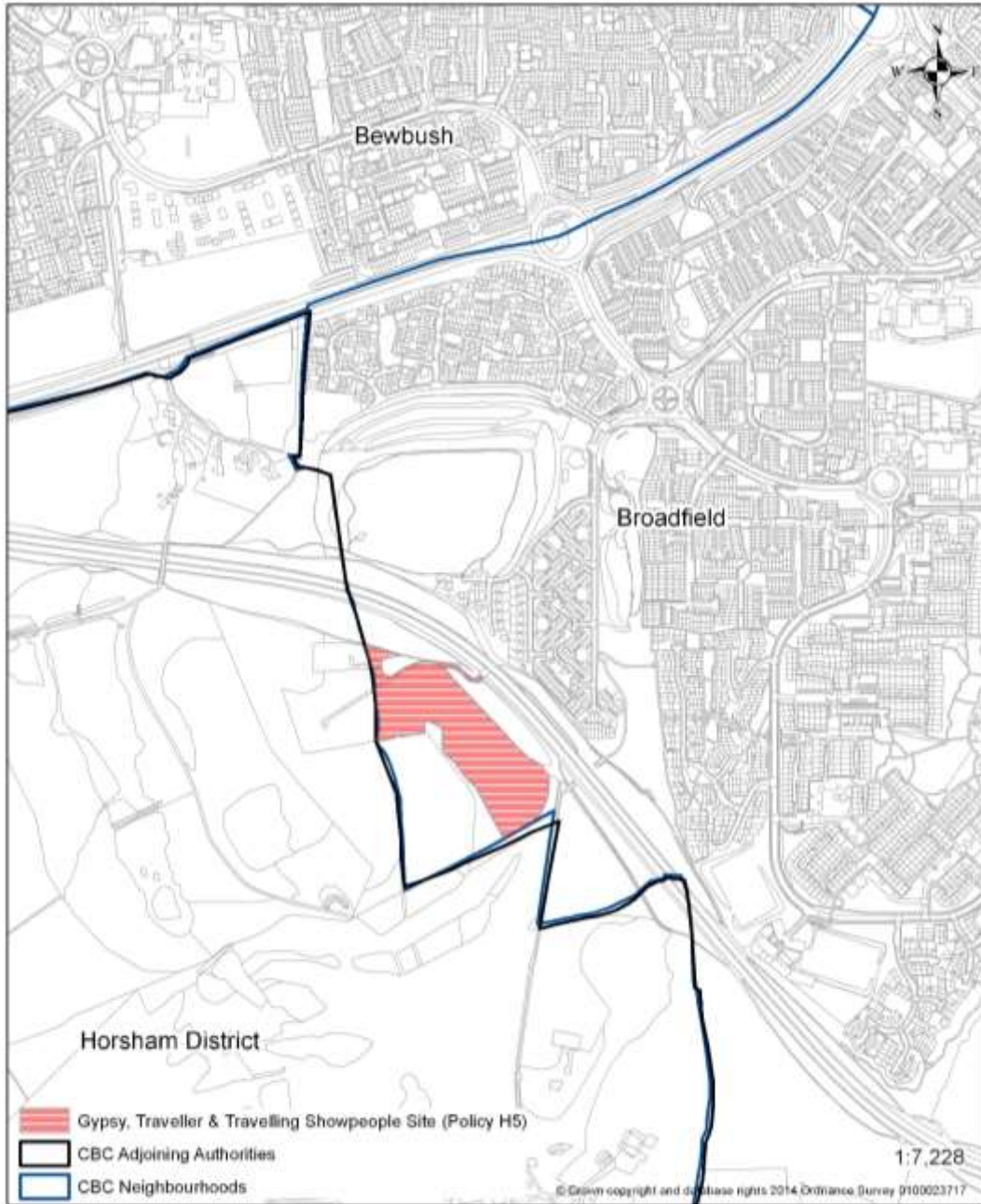
- Initial Publication Consultation for the Local Plan Review (January 2020).

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

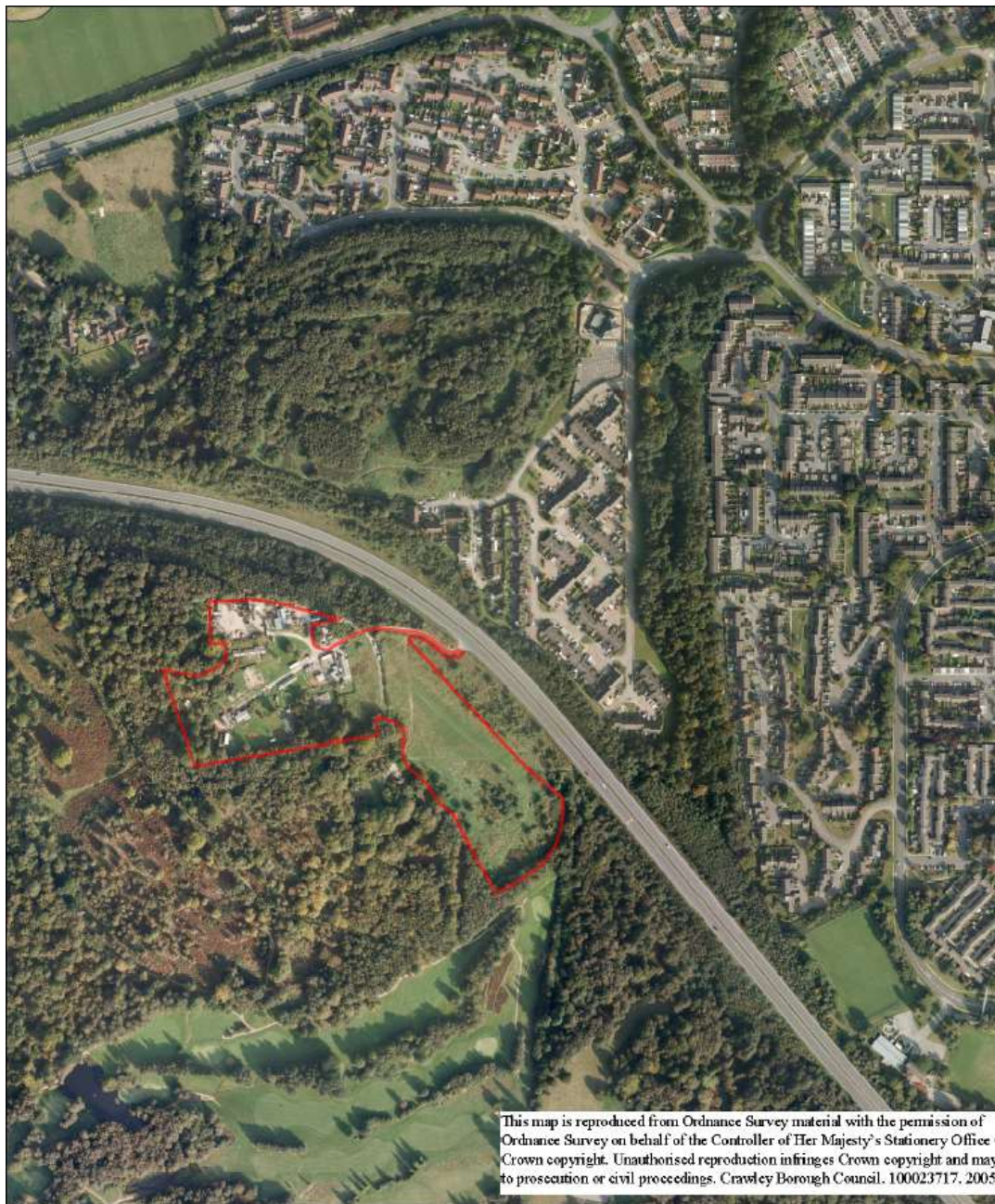
Nevertheless, a site was identified as reserve Gypsy and Traveller site for allocation in the 2015 Local Plan at the former Broadfield Kennels site. This site allocation has been continued through the process of the Local Plan Review. Comments received through the Review Local Plan process (Early Engagement July 2019 and Publication January 2020) are set out in Appendix G.

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 guidance¹¹, it will be vital for the council to tackle such issues and to identify a genuine 'need' for plots/pitches over the Plan period and beyond.

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.

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

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

Number of Encampments		
	Crawley	West Sussex-Wide
2014/15	2	115
2015/16	2	68
2016/17	6	72
2017/18	4	72
2018/19	8	90

Total Number of Days			
	Crawley	West Sussex- Wide Total	West Sussex- Wide Average
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

Total Number of Caravans		
	Crawley	West Sussex-Wide
2014/15	7	471
2015/16	20	339
2016/17	32	448
2017/18	39	455
2018/19	99	609

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

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

Site/Address:

.....

Name:

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

Q1. ETHNICITY OF RESPONDENT

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

Q2. COMPOSITION OF HOUSEHOLD

Please continue on a separate sheet if necessary

Name
Gender
Year or Birth/Age
Relationship to Respondent

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

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

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

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

Q5. DETAILS OF CURRENT ACCOMMODATION?

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

Q6. TYPE AND SIZE OF CURRENT ACCOMMODATION?

(insert number and circle size)

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

Q7. LENGTH OF TIME AT CURRENT ADDRESS?

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

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

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

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

Yes () No () Don't know () Response not provided ()
 If so, when:
 Details (i.e. pitch no./reason)

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

Yes () No ()
 Response not provided ()

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

Location:

 Response not provided ()

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

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

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

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

*** Type of Accommodation:**

- A. Affordable/Social Housing
- B. Local Authority Pitch/Plot
- C. Private Pitch/Plot
- D. Privately owned home
- E. Privately rented home
- F. Response not provided

**** Housing/Site Register:**

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

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

Yes () No ()
Response not provided ()

Location/Address:.....

Additional Questions to Ask to Travelling Showpeople

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

Yes () No ()
Response not provided ()

TRANSIT GYPSY AND TRAVELLER QUESTIONS

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

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

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

.....
Response not provided ()

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

.....
Response not provided ()

Q17. DO YOU HAVE A BASE ELSEWHERE?

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

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

.....
Response not provided ()

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

.....
Response not provided ()

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

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

Your assistance in answering these questions is appreciated

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

ORIGINAL QUESTION NUMBERS KEPT FOR CONSISTENT COMPARISON

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

Site/Address:

.....

Name:

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

Q1. ETHNICITY OF RESPONDENT

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

Q2. COMPOSITION OF HOUSEHOLD

Please continue on a separate sheet if necessary

Name
Gender
Year or Birth/Age
Relationship to Respondent

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

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

Q6. TYPE AND SIZE OF CURRENT ACCOMMODATION?

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

Q7. LENGTH OF TIME AT CURRENT ADDRESS?

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

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

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

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

Yes () No ()
Response not provided ()

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

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

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

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

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

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

*** Type of Accommodation:**

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

F. Response not provided

**** Housing/Site Register**

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

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

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

Location/Address:.....

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

Gypsies and Travellers Interview Questions

<p>Name:</p> <p>Address:</p> <p>Date:</p>
--

Questions

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

--

Who is taking part in the interview?

--

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

--

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

--

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

Do you have friends in the area?

Do you have other family members living in the area?

What are your neighbours like?

What does living here offer you and your family?

What concerns you most about living here?

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

What kinds of things affect your health?

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

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

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

When do you think you will need this?

APPENDIX D: 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 Forward 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 long term temporary sites (of up to one month) should not be subject to existing or predicted air, road and/or rail noise in excess of 60 decibels.

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

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

Size and Layout of Site

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

Size of Site:

It is recognised in the guidance that there is no one ideal size of site or number of pitches that would be conducive for all of the GTTS community. However, the guidance does suggest 'that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage' (Para 4.7). In addition, sites of only three or four pitches can also be successful, particularly when designed for a large single family. 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 m² for each pitch has been established.

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

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

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,

¹² 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 E: 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

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 Cottessmore 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 F: EXTRACT DRAFT LOCAL PLAN POLICY H8: GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITE

Gypsy, Traveller and Travelling Showpeople

13.45 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 (2026/27 – 2036/37) 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 sites of up to one month, and 66 decibels for temporary 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

- 13.46 *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 two authorised Gypsy and Traveller sites in Crawley, for four pitches in total, and one authorised site for Travelling Showpeople with three plots, but there is a more substantial local population living within bricks and mortar accommodation.*
- 13.47 *The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. Whilst the survey work completed for those in bricks and mortar accommodation has not identified 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.*
- 13.48 *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. 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.*
- 13.49 *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 protects existing neighbours from inappropriate development.*
- 13.50 *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 proposals. 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 sites would not be in the long term interest of future inhabitants.*

APPENDIX G: REPRESENTATIONS RECEIVED REGARDING POLICY H8: EARLY ENGAGEMENT JULY 2019 AND PUBLICATION JANUARY 2020

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"> 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 which will likely cause pollution of the land through the dumping of large quantities of industrial, work related and 	<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 Traveller population. However, a potential need may arise in the future from new households</p>

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>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 site entrance almost had a collision with a motorcycle, which coming down to the exit before joining the road was</p>	<p>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>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).</p> <p>On this basis it 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</p>

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
				<p>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>Countryside WSCC 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>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites: WSCC 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 change over the Local Plan period’. WSCC regard the current location of the potential settlement to not meet the</p>	Acceptance of allocated site noted.

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			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>Policy H8 Gypsy, Travellers and Travelling Showpeople Sites</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> <p>Supporting text of para 12.110</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 Policy EP4 and the accompanying Local Plan Noise Annex.

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>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>Supporting text of para 12.112 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>	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.
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 & 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.

Early Engagement Consultation: July 2019				
Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			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> .	

Publication Consultation: January 2020				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
REP/056	Gatwick Airport Limited	H8	<p>Policy H8: Gypsy, Travellers and Travelling Showpeople Sites 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>GAL Comment: 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>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 Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise. 57 decibels for permanent sites, 60 decibels for long term temporary sites up to one month, and 66decibals for temporary sites ... [continue with other criteria ((b) to (f))]</p> <p>Reasoned Justification – Proposed Amendment Paragraph 13.46 16.9 The supporting text at paragraph 13.46 would need to be updated in line with GAL’s comments on</p>

Publication Consultation: January 2020										
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications						
			<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>Gypsy, Traveller and Travelling Showpeople Sites</p> <table border="1"> <tr> <td>Permanent Sites</td> <td>Not permitted in locations exposed to existing or predicted noise levels >57dBA</td> </tr> <tr> <td>Long Term Temporary Sites (up to one month)</td> <td>Not permitted in locations exposed to existing or predicted noise levels >60dBA</td> </tr> <tr> <td>Temporary Sites</td> <td>Not permitted in locations exposed to existing or predicted noise levels >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>	Permanent Sites	Not permitted in locations exposed to existing or predicted noise levels >57dBA	Long Term Temporary Sites (up to one month)	Not permitted in locations exposed to existing or predicted noise levels >60dBA	Temporary Sites	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>
Permanent Sites	Not permitted in locations exposed to existing or predicted noise levels >57dBA									
Long Term Temporary Sites (up to one month)	Not permitted in locations exposed to existing or predicted noise levels >60dBA									
Temporary Sites	Not permitted in locations exposed to existing or predicted noise levels >66dBA									

Publication Consultation: January 2020				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
			<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>	

Publication Consultation: January 2020				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
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 & 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&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&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>	

Publication Consultation: January 2020				
Ref. No.	Respondent	Policy/ Para	Comments	Suggested Modifications
			<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>	

DRAFT