

# Planning policy development and provision for Gypsy and Traveller sites in England.

## Introduction

A year after Circular 1/2006 was issued FFT thought it would be useful to see how much progress had been made by local planning authorities to make provision and what plans they had made for Gypsy and Traveller accommodation. It was decided to make a postal survey of key local authorities and follow this up with a trawl through their websites to identify their plans through published Local Development Schemes (LDS). It was hoped that such a survey would enable progress to be gauged and ascertain likely completion times of the planning process to meet the large unmet need for caravan sites for Gypsies and Travellers.

Circular 1/2006 has as one of its aims to:

*'increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years'*

The implication of this aim is that a substantial number of sites should be established on the ground by the beginning of 2009 to the beginning of 2011.

The Circular laid out a process by which this was to be achieved. Firstly Gypsy and Traveller Accommodation Assessment (GTAAs) were to be made from which pitch numbers needed would be identified. Regional Planning Boards would then utilise this data to identify pitch numbers for each local planning authority. Local Planning Authorities would then in Development Plan Documents (DPDs) identify specific sites to match pitch numbers from the Regional Spatial Strategies.

The decision to require local authorities to allocate land for sites within planning documents has arisen from the failure of the previous planning circular (Circular1/94) to make adequate provision.

The Circular clearly recognised that this new process will take time and made recommendations that where there is clear and immediate need, for instance evidenced through the presence of significant numbers of unauthorised encampments or developments, local planning authorities should bring forward DPDs containing site allocations in advance of regional consideration of pitch numbers and the completion of new GTAAs (Transitional Arrangements, para 43).

## Current Position and Projected Countrywide Need:

The bi-annual caravan counts published by the Department of Communities and Local Government (DCLG), although lacking accuracy, are the only available base statistics.

### Count of Gypsy Caravans 19<sup>th</sup> January 2006 as provided by DCLG: England

Authorised sites	Unauthorised sites on Gypsies own land	Unauthorised sites not on land owned by Gypsies	Total all caravans
12,474	2,154 (714)	1,118 (438)	15,746
79%	14%	7%	100%

(Figures in brackets indicate caravans on sites 'tolerated' by local authorities)

Projected residential need can be estimated by applying the rule of thumb formula devised by Niner et al (

Preparing Regional Spatial strategy reviews of Gypsies and Travellers by regional planning bodies, DCLG March 2007) to the count statistics as follows:

### **Residential Pitch Requirement for England employing caravan count statistics from above -**

**Requirement = UDP (2,154/1.7 = 1267 pitches) + 0.4 AP (12,474/1.7) (2953 pitches) = 4202 pitches (equivalent to 7,143 caravans)**

Where :

**UDP** = number of pitches in unauthorised developments calculated by Count caravans on unauthorised sites on gypsy owned land divided by 1.7.

**AP** = the number of authorised pitches calculated by Count caravans on authorised sites divided by 1.7

**0.4** = the relevant proportion of authorised pitches to be applied, established empirically from robust GTAAs. This covers things like family formation, overcrowding, movement in and out of housing.

This method of estimating requirements does not encompass those caravans on land not owned by Gypsies. A proportion of these caravans will have a requirement for transit provision which is not catered for in the tool but a proportion are also likely to require permanent residential sites. Hence further 1,118 caravans are likely to require some form of provision. These are winter figures so if summer count data is used this need increases to 2099 caravans (1,234 pitch equivalents) to cater for those not camped on their own land.

In total therefore there seems to be a requirement for around 5,436 pitches providing both residential and transit accommodation for around 9,241 caravans in the period to 2011. This is of course a significant requirement and a short time frame given that, unlike conventional housing, there is no existing stock of land in developers hands which is available for sites. In a sense therefore it is a standing start for this process. These assessments are of course based on caravan count statistics which are known to be unreliable in some places and may seriously underestimate the number of Gypsy and Traveller caravans present in some areas.

In any event there is an very urgent and immediate need to accommodate those caravans which are not tolerated by local planning authorities - some 1,440 caravans are in this category to which must be added over 1,400 caravans in summer on land not owned by Gypsies which are not tolerated by local authorities. Both of these categories are at high risk of legal action of one sort or another and of eviction proceedings. Hence around 3,000 caravans and the families which live in them are at risk and must be considered to fall into the category of unmet and clear need (para 43 of Circular 1/2006). To this must be added the 610 caravans on Gypsies own land who are 'tolerated' but exist in a planning 'limbo' and the 438 caravans 'tolerated' by councils when camped on land other than their own. All of these categories must be considered to have an urgent and unmet need for authorised provision of one sort or another as stances by councils on toleration can and do change. Hence the total of unmet and urgent need must amount to around 4,000 caravans ( say 2,400 pitches or thereabouts). This implies a need for urgent action by many local planning authorities to make sure that arrangements are put in place to accommodate this need in a reasonable time frame. As time passes the level of urgent need will inexorably rise with family formation etc.

### **Survey Method**

62 local authorities were chosen which had more than 100 caravans in total and a selection of those with more than 20 caravans camped in an unauthorised manner (both unauthorised developments and unauthorised camping). Each local authority was contacted by letter and asked several simple questions to help elucidate the means of delivery intended for the provision of Gypsy and Traveller sites consequent upon the implementation of circular 1/2006.

The following questions were asked:

1. Are you planning to bring forward a separate DPD to deal with gypsy and Traveller accommodation needs in advance of allocations from a revision of an RSS, or from the RPB in the absence of an RSS revision, in view of the need? If you are what is the timetable for completion and what level of need are you anticipating?
2. Will your plans cater both for those able to afford to develop their own sites and those who are unable to do so and will have to rent from local authority or RSL provision?
3. If you are not planning to bring forward a DPD could you explain what actions you will be taking to meet the needs as expressed by the caravan count figures. The Government lays out a series of measures in Circular 1/2006 to meet need, if only on a temporary basis, within a 3-5 year period.
4. What actions have you taken and are planning to take to involve the **local** Gypsy and Traveller community in the planning process? We are aware that they are considered as a 'hard to reach' and 'under-engaged' group and that to be effective in the planning process engagement needs to be early, sustained and meaningful. Special measures will, in our view, have to be instituted if this process is to be successful ensuring that the right number of sites are provided for in the right places providing a good quality living environment.

35 local authorities replied, some after reminders were sent out, so a trawl of all 62 local authority websites was made and local development schemes examined to find out timings for policy delivery and what development plan documents were likely to deliver sites.

**Local authorities contacted and numbers of caravans (with more than 100 caravans in last five counts to Jan 06 plus some of those with more than 20 unauthorised caravans (from DCLG Gypsy Caravan Counts)).**

<b>North:</b>		<b>Midlands:</b>	
Darlington	85-130 caravans	Hinckley and Bosworth	98-127 caravans
Congleton	81-135 caravans	Newark and Sherwood	0-151 caravans
Lancaster	85-128 caravans	Northampton	61-126 caravans
Kingston upon Hull	24-124 caravans	Bassetlaw	66 unauthorised caravans
Doncaster	323-535 caravans	Rutland	22 unauthorised caravans
Leeds	72-141 caravans	Herefordshire UA	84-135 caravans
York	92-126 caravans	North Shropshire	78-108 caravans
Wakefield	59-124 caravans	Nuneaton and Bedworth	50 unauthorised caravans
		Rugby	93-131 caravans
		Malvern Hills	41 unauthorised caravans
		Wychavon	242-292 caravans

**The East:**

**London:**

Mid Beds	90-99 caravans	Bromley	80-98 caravans
S Beds	111-175 caravans	Hackney	33 unauthorised caravans
E Cambs	127-173 caravans	Havering	46 unauthorised caravans
Fenland	436-508 caravans		
S Cambs	475-591 caravans		
Basildon	319-401 caravans		
Braintree	35 unauthorised caravans		
Chelmsford	103-224 caravans		
Epping Forest	140-192 caravans		
St Albans	102-124 caravans		
Kings Lynn	180-187 caravans		
S Norfolk	69-120 caravans		
Peterborough	49-139 caravans		
Mid Suffolk	50-113 caravans		
Thurrock UA	130-230 caravans		

**The South East:**

**The South West:**

S Bucks	132-167 caravans	Kerrier	5-100 caravans
Brighton and Hove	48 unauthorised caravans	Teignbridge	96-140 caravans
Wealdon	64 unauthorised caravans	Purbeck	53 unauthorised caravans
Test Valley	21 unauthorised caravans	Stroud	41 unauthorised caravans
Winchester	23 unauthorised caravans	Tewkesbury	210-224 caravans
Maidstone	118-239 caravans	Sedgemoor	26 unauthorised caravans
Sevenoaks	75-147 caravans	S Glos	199-244 caravans
Swale	43-110 caravans	Taunton Deane	85-134 caravans
Tonbridge and Malling	28 unauthorised caravans	N Wilts	22-1142 caravans
W Oxford	106-137 caravans	Salisbury	92-116 caravans
Portsmouth	20 unauthorised caravans		
Runnymede	97-150 caravans		
Surrey Heath	49-112 caravans		
Waverley	150-181 caravans		
Horsham	28 unauthorised caravans		
Windsor and Maidenhead	55-120 caravans		

### **Responses to questions:**

1. Only seven local authorities were planning to bring forward dedicated Development Plan Documents to address Gypsy and Traveller Accommodation issues (Mid Beds, S Cambs, East Cambs, S Norfolk, Basildon, Horsham and S Gloucestershire councils). Two of these councils had received a direction from the Secretary of State and responded with a Gypsy and Traveller DPD. Two of the DPDs are due for adoption in 2008, two in 2009 and three in 2010. Brentwood council had also received a direction from the SoS and intends to produce a Gypsy/Traveller DPD, the issues and options stage for this document starts in July 2007. The caravan count figures for Brentwood show between 18 and 21 caravans on unauthorised developments not tolerated by the council and 13-18 caravans on private authorised sites.

2. Only a few respondents indicate that provision would cater for both RSL and private sites. Some indicated that they did not consider this question a planning issue despite most local authorities considering the needs for affordable housing as part of their housing strategies in planning documentation.

3. Apart from those few planning to make provision through dedicated DPDs all the other local authorities indicated that they were planning to make site allocations through site allocations documents, housing allocations documents or through area action plans at some date in the future.

4. Responses to the question about consultation varied widely. A few local authorities mentioned that they had well established fora for consultation of local Gypsies and Travellers (7 local authorities), some merely referred to the GTAA for the district (8 local authorities) and others indicated that the TLO or GLO would be used as a conduit for communication (5 local authorities). Statements of Community Involvement were referred to as a guide as to how consultation would be carried out by 4 local authorities whilst five mentioned national groups, either as the only source of consultation or in combination with other methods of consultation. Two local authorities indicated that they would use consultants and two indicated that they would use outreach methods.

### **Planning progress:**

#### **Gypsy and Traveller Accommodation Assessments (GTAAs) and Caravan Counts**

The DCLG has stated that over 80 per cent of local authorities have made a start on Gypsy and Traveller Accommodation Assessments and many are finalised or near to being finalised at present.

However deep concerns have arisen regarding the robustness of many GTAAs and as a result the DCLG commissioned research to help resolve the difficulties (Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies DCLG March 2007). This research addressed some of the issues arising and developed a tool to help make assessments of residential pitch requirements. However useful this tool may be it does not address the central problem which besets most GTAAs - that there was no ground check on the veracity of the base information from which needs assessments flow - the bi-annual caravan counts. Even the Cambridge sub-region GTAA which was found to be robust by the research contained the statement that the quantification of need which the authors arrived at was conservative. By implication this was because the count data was used as the starting point for the study.

These counts are voluntary and carried out by local authorities and reported to central government. The DCLG publishes these statistics. The counts have been subject to severe criticism and research carried out on behalf of the ODPM in 2003 (Counting Gypsies and Travellers, Housing Research Summary No 206 ODPM 2003) stated that accuracy varies between local authorities and that one of the reasons for lack of accuracy was the non-involvement of the Gypsy and Traveller population. The research recommended that purpose should guide the design of a revised system and that the count needed to be re-launched to stress its importance, its links to policy and the use that will be made of the information.

The counts are now reported in a different format than formerly and show numbers of caravans on authorised private and RSL sites and gives details of 'tolerated' and 'non-tolerated' unauthorised sites split between those on Gypsies own land and those on land not owned by Gypsies. Whilst this is useful FFT is not aware that any attempt has been made to check the veracity of the data presented. There has been no check on ground truth.

Evidence for concern about the numbers presented in the caravan counts has arisen recently from a number of sources:

1. The Cornwall GTANA fieldwork was carried out by a local Travellers charity who discovered 100 plus caravans on one site in Restormel District together with several small sites in the district. Restormel had made a zero return for some years despite a long planning history for a number of sites (a member of FFT staff acted for a local Traveller in 1996 and 1997 at a planning appeal and visited several sites, the council had vigorously opposed applications for Traveller sites in the district but a large private site had been 'tolerated for many years, it probably effectively has planning permission because of the long time it has been in existence.). It is interesting to note that in Dec 2006, subsequent to the GTAA, Restormel announced a 'u turn' on Traveller site policy and indicated that it would consider provision. The experiences during the conducting of the Cornwall GTAA fieldwork would suggest that where there is no Traveller involvement there may be substantial numbers of caravans/sites missed if the caravan count is sole starting point for numbers assessments.

2. The Cambridge sub-region study, which is probably the most robust one available, stated that its figures were certainly conservative, being based on the caravan count figures (without attempt at checking) . It also reported that for the Peterborough district unauthorised camping was very low. At a recent planning appeal (Richard Smith v Peterborough CC) in the area evidence was presented for extensive unauthorised camping.. The inspector concluded that the Cambridge sub-region GTANA appeared to be based on unreliable statistics. The indications are that Peterborough is not doing its counts properly and may have not cooperated in the needs assessment study to the extent that it might have done.

3. The draft East Midlands Plan (RSS8) contains interim assessments for districts prior to the completion of GTANAs. In the background paperwork on the East Midlands website the housing policy justification paper (para 6.8 p 35) contained the following:

*"6.8 It is estimated, therefore, that pitch requirements derived from robust GTAAs may be at least double those based on Count Data. Whilst this is arbitrary it is cautious: for one of the few local authorities to have already provided data derived from a Needs Assessment, need is estimated at up to 20 residential pitches plus up to 5 transit pitches, compared to a Caravan Count average of 2 caravans."*

4. It is reliably reported recently, from one of the main legal advice giving organisations to Gypsies and Travellers, that there is a significant upsurge in calls relating to eviction in the days before the caravan counts are carried out in January and July. The implication of this is that a significant number of local authorities evict Gypsies and Travellers who are camped in unauthorised places, presumably to reduce reporting of unauthorised camping. This has been a consistent pattern over very many years. It is not known if these caravans so evicted are counted elsewhere. During the assessment of need in Crawley district in the south east a number of families were missed following blocking off of unauthorised sites and continual eviction. Hence some of the 'regular' Crawley families were not in Crawley at the time interviews were carried out. Something similar is believed to have happened in Southampton, which we understand has regular high numbers of unauthorised encampments and does so right now but not at the time of the assessment. This gave rise to the apparently erroneous statement in the needs assessment of Hampshire that urban authorities do not have large numbers of unauthorised encampments. However Southampton council is making progress towards provision of a transit site and has recognised the need.

5. In Wales where caravan counts have been recently restarted they are not considered as national statistics, presumably because they are not reliable enough.

6. The GTAA prepared by Anglia Ruskin University for the Dorset Consortium of Districts and Unitary Authorities and Dorset County Council states that in both Bournemouth and Poole despite having very low caravan count figures council records showed evidence of regular and repeated unauthorised encampments of up to 30 caravans. The GTAA also mentioned that the counts do not consistently record New Travellers of whom there are many in Dorset.

Thus there does seem to be a growing and reliable body of evidence and opinion from around the country which in our view justifies further work on the numbers side of the Needs Assessments. In particular there needs to be revision on how caravan counts are carried out with some ground truth established by ensuring that the local authority counters are accompanied by a local Traveller/Travellers to ensure that all sites are covered as well as independent academic validation of a sample of local authorities. The problem is simply that there is no means of telling which councils are carrying out reasonably accurate caravan counts and which are not. This is not a secure base upon which to build planning provision.

The issue of Gypsies and Travellers in housing who really would wish to be on sites and who would take up site living were sites available has not been satisfactorily resolved - some attempts have been made in a few GTAAs to consider this in some depth (for example the Cambridge study) but most ignore it or provide only an estimate because of the difficulty that was perceived in reaching the people in housing. General housing needs surveys do not identify this need at all as far as ascertainable at present.

In conclusion whilst the GTAAs and the associated research findings are a step forward they do only represent a starting point and further work is urgently needed on the numbers side to inform the development of planning policy. Planning is an evidenced based process and the evidence needs to be securely based and have the confidence of the people whose needs it addresses.

#### **RTPI Good Practice Note No 4**

In March 2007 the Royal Town Planning Institute issued the first new Good Practice Advice Note for a number of years dedicated to Planning for Gypsies and Travellers. Part C covers Accommodation and Site Delivery and makes a number of points about both regional and local strategies. It clearly highlights the need for continuous monitoring of the effectiveness of baseline data (based on caravan counts) and the importance of quality baseline data to inform regional bodies who set out the level of need. The advice note clearly identified the need for regular, and given the length of the RSS review process, almost ongoing review.

In relation to delivery at local authority level the Good Practice Note clearly identified the need for local authorities to translate assessment of need into sites and allocations. It states that the development of a separate topic based Gypsy and Traveller accommodation strategy DPD may be the only mechanism for a local authority to meet the 3-5 year timetable contained in the Circular. Where dedicated DPDs are not developed then Core Strategies, which will normally come on stream first, should contain criteria to allow the development of windfall sites in advance of allocations in site allocations DPDs.

There are arguments on both sides about the wisdom of dedicated DPDs or reliance on general site allocations DPDs. However timing is clearly an important factor which needs to be taken into account. Site allocations in general or housing site allocations documents must follow on from core strategies whilst dedicated site allocation DPDs may be prepared in advance of core strategies and have some chance of meeting the 3-5 year target. The good practice note indicates that subsequent to identification of sufficient sites to satisfy identified need, the planning authority should seek to integrate provision for Gypsies and Travellers within its general housing strategies and policies. It would thus seem prudent for local authorities with significant identified needs to go ahead with dedicated DPDs to meet initial demand as soon as possible and thereafter to mainstream Gypsy and Traveller planning provision alongside general housing provision.

#### **Planning Delivery Timing**

#### **Regional Spatial Strategies:**

The three southern regions are undertaking partial reviews of the Regional Spatial Strategies. These are likely to be completed by mid 2009 for the East, 2009 for the South East and March/April 2008 for the South West. The East Midlands plan has set out interim pitch requirements but the West Midlands review of the RSS in relation to Gypsy and Traveller provision is only due to begin in 2007. The northern region assembly websites are silent on plans for RSS revisions for Gypsy/Traveller provision. If local planning authorities wait until the reviews are published before making a start on site allocations, as seems likely for many authorities, then considerable delay may result. Indeed there may be no opportunity to dovetail in Gypsy/Traveller requirements as issued by RSS revisions into some site allocations documents if the latter are at an advanced state of preparation or have been substantially completed when the district pitch allocations are issued by Regional Planning Boards. If timely provision is to be made then the only solution then will be to develop a dedicated DPD. Given the late starting date following on from the timing of the partial reviews in southern and eastern England these may not be finalised within the Government's 3-5 year target if a start is not made now.

### **Local Development Frameworks:**

Circular 1/2006 intends that site provision will be delivered through land allocated for sites in Development Plan Documents just like conventional housing. In the past applications for sites have been judged against criteria based policies and mostly planning permission has been acquired through the appeals system. Alice Lester of the Planning Advisory Service, at the launch conference of the RTPI Good Practice Advice Note No 4 (Planning for Gypsies and Travellers, March 20087), stated that during some work on good practice by local authorities in relation to planning provision for sites the researchers could not find a single example of a planning application for a Gypsy/Traveller site that could be considered to have been straightforward and gone well. This does not inspire confidence in the ability of local authorities to identify needed sites without special attention to the issue. The work which was published in Nov 2006 (Spaces and Places for Gypsies and Travellers, Planning Advisory Service) drew on existing good practice and used the example of South Cambridgeshire who are in the process of preparing a Gypsies and Travellers DPD. The work concluded that, amongst other things, there was a need to expedite the planning process and highlighted the ability of councils to make a start on preparing DPDs without having to wait for the GTAA or regional allocation of site numbers to be completed.

Given the proportionately large number of sites needed over all and the very urgent need for around 2,400 pitches (see above) it might have been thought that many councils would have taken the route of preparing separate dedicated DPDs to solve the site problem. The following table gives an indication of methods and timing of planning delivery, it is drawn from responses to the survey with additional data from Local Development Schemes published on local authority websites (see Appendix for full details).

### **Adoption dates of Planning Documents for 62 local planning authorities**

	2006	2007	2008	2009	2010	2011	2012	>2012
Core Strategy	1	11	14	23	10	2	1	

Generic Policy document		7	7	8	3	5	1	1
Allocations document		4	10	15	15	9	2	
Gypsy/Traveller DPDs			2	2	3			

In terms of the caravan count data the seven authorities developing dedicated DPDs have only 10 per cent of the total number of caravans in England in January 2006. If, as seems likely, need is proportional to numbers of caravans then about 90 per cent of need is intended to be delivered through general site allocations, housing allocations or area action plans.

According to the data obtained from the Local Development Schemes 35% of districts surveyed will not have allocations made before the beginning of 2010. In any event there is likely to be a delay between site allocation in planning documents and site delivery on the ground which will exacerbate any time delay consequent upon not using dedicated DPDs.

For allocations documents due to be adopted before the end of 2009 (30%) it is likely that, because of the lag due to councils awaiting the outcome of RSS reviews in the East, South East and South West as well as elsewhere, site allocations may not be made in this round of allocations or they will provide a bare minimum of pitches.

Taken together this indicates potential for considerable and serious delay in providing for the full residential need. Crudely put around two thirds of councils look at risk of not making provision in planning documents during the target timeframe in the Circular.

## Conclusions

It is clear that the existing GTAAs together with the DCLG commissioned study on preparing Regional Spatial Strategy reviews represent only a starting point and point a way forward to developing adequate provision for Gypsies and Travellers. As the study pointed out the results from its application can only be regarded as an interim measure.

The base data, the caravan counts, from which all GTAAs flow are a flawed evidence base and require revisiting as a matter of urgency if planning is to proceed to meet the needs of Gypsies and Travellers for accommodation in a reasonable timeframe.

The potential for delay in provision within the system is large with many families continuing to exist for several years in situations where they are faced with imminent eviction or legal action leading to eviction. The consequent knock-on effects on health, well-being, education and employment opportunities have long been recognised.

The methods of planning delivery clearly indicate considerable potential time delay in making provision and even some of those with dedicated DPDs may not make provision within the target timeframe. Only two of the seven dedicated DPDs will make land allocations by the start of the Government target timetable for provision of the beginning of 2009. The delay between land allocations and sites with planning permission being established for those being adopted during 2010 suggest that these will not meet the target of substantial provision by the beginning of 2011.

## **Recommendations**

1. A review into caravan counts and methods of ascertaining the true size of the Gypsy and Traveller population, both in caravans and in housing be instigated immediately. The count methodology has been reviewed but few of the recommendations have been implemented. At the very least future caravan counts should be carried out with the help of local Gypsies and Travellers. Alongside a review a valid statistical check should be made of counts by means of ground-truth checking of a representative sample in each region. This exercise should be carried out by independent academics. This should ensure that future design and methodology of caravan counts produce reliable statistics on which to base future provision. Inter alia the numbers of Gypsies and Travellers in housing should be ascertained and estimates made of the needs of those in housing for sites.
2. Alongside six-monthly caravan counting all local planning authorities should be required to report bi-annually to the DCLG details of all applications for sites, the outcome of those applications together with details of planning appeals, enforcement appeals and their outcomes. These statistics should be published by DCLG so as to aid monitoring of progress on the ground.
3. Progress in development of planning policy for Gypsies and Travellers should be centrally monitored and published. The RPBs and DCLG should monitor progress against need deriving from GTAAs and subsequent district pitch allocations. Each local authority should, on receipt of pitch requirements from the relevant Regional Planning Board be required to report on plans for delivery with a timetable. This information should be centrally collated and published. The Secretary of State should consider giving directions to those local authorities whose plans will not deliver land allocations within the target timeframe to meet unmet need. The Circular 1/2006 points up the need for transitional arrangements to meet clear and immediate need.
4. The issue of provision for those who travel should be the subject of a separate study with all options considered. The chequered history of provision of fixed transit accommodation suggests that provision for those who wish to continue to travel more or less full time will have to be accommodated in a variety of ways. Sites of fixed permanent location do not provide the sole solution. A nomadic solution should be sought to solve a nomadic issue.

Steve Staines  
FFT April 2007

## **Appendix: Details of Submission and Adoption dates of Policy Documents**

(S: Submission Date, A: Adoption Date)

Local Authority	Core Strategy	Generic Policies	Allocations	Gypsy Traveller DPD
Darlington	S: 8/ 2007 A: 1/2009	S: 5/ 2009 A: 9/2010	Area action plan A: 9/2010	
Congleton	S:5/2007 A:9/2008	S: 5/2007 A: 9/2008	S:4/2006 A:7/2007	
Lancaster	S: 6/2008 A: 6/2007	S: 5/2007 A: 9/2008	S:4/2006 A: 7/2007	
Hull	S: 1/2007 A: 4/2008	S: 9/2006 A: 10/2007	S: 1/2007 A: 3/2009	
Doncaster	S 1/2007 A: 3/2008		S: 3/2008 A: 7/2009	
Leeds	S: 9/2009 A: ? 2010		S: 7/2008 A: ?/2009	
York	S: 8/2006 A: 12/2007	S: 2/2007 A: 5/2008	S: 1/2008 A: 8/2009	
Wakefield	S: 4/2006 A: 7/2007	S: 9/2006 A: 12/2007	S:1/2007 A: 4/2008?	
Hinckley and Bosworth	S: 9/2008 A: 11/2009	S: 9/2009 A: 11/2010	S: 9/2009 A: 11/2010	
Newark and Sherwood	S: 5/2006 A: 6/2007	S: 5/2007 A: 8/2008	S: 5/2007 A: 8/2008	
Northampton	S: 3/2006 A: 3/2007	S:5/2006 A: 7/2007	S: 5/2006 A: 7/2007	
Bassetlaw	S: 3/2006 A: 3/2007	S: 9/2007 A: 10/2008	S:10/2007 A: 10/2008	
Herefordshire UA	S: 9/2009 A: 7/2010	S: 1/2010 A: 2/2011		
North Shropshire	S: 12/2008 A: 5/2010	S: 4/2011 A: ?/2012	S: 3/2010 A: 1/2012	
Nuneaton	S: 3/2008 A: 7/2010		S: 1/2009 A: ?? 2012	
Rugby	S: 1/2009 A: 1/2010		S: 12/2009 A: 12/2010	
Malvern Hills	S: 4/2008 A: 6/2009	S: 2/2010 A: 3/2011	S: 2/2010 A: 3/2011	
Wychavon	No LDS available		Policies will be saved til 2011	
Mid Bedfordshire	S: 4/2008 A: 8/2009	S: 4/2008 A: 8/2009	S: 4/2008 A: 10/2010	S: 12/2007 A: 10/2008
South Bedfordshire	S: 3/2007 A: 8/2008		S: 2-6/2008 A: 8-10/2009	

East Cambridgeshire	S: 4/2008 A: 7/2009		S: 2/20 A: 5/2010	S: 2/2009 A: 5/2010
Fenland	S: 4/2007 A: 6/2008		S: 4/2008 A: 8/2009	
South Cambridgeshire	S: 1/2009 A: 2/2010	S: 1/2006 A: 5/2007	S: 1/2006 A: 5/2008	S: 12/2008 A: 10/2009
Basildon	S: 6/2008 A: 7/2009	S: 6/2009 A: 7/2010	S: 12/2009 A: 3/2011	S: 9/2008 A: 7/2009
Braintree	S: 4/2008 A: 4/2009	S: 4/2008 A: 4/2009	S: 6/2009 A: 7/2010	
Chelmsford	S: 6/2006 A: 12/2007		S: 4/2008 A: 6/2009	
Epping (year delay indicated)	S: 9/2008 A: 12/2009		S: 6/2009 A: 10/2010	
St Albans	S: 11/2007 A: 3/2009	S: 11/2007 A: 5/2009	S: 11/2007 A: 5/2009	
Kings Lynn and West Norfolk	S: 5/2007 A: 6/2008		S: 5/2008 A: 6/2009	
South Norfolk	S: 4/2009 A: 3/2010	S: 10/2010 A: 8/2011		S: 12/2007 A: 9/2008
Peterborough	S: 11/2007 A: 9/2008	S: 12/2007 A: 12/2008	S: 4/2007 A: 9/2008	
Mid Suffolk	S: 10/2007 A: 2/2009	S: 4/2008 A: 8/2009	S: 10/2008 A: ?/2010	
Thurrock	S: 2/2008 A: 6/2009		S: 2/2008 A: 12/2009	
Bromley	S: 1/2009 A: 12/2009		S: 1/2009 A: 12/2009	
Hackney	S: 2/2006 A: 10/2007		S: 2/2006 A: 10/2007 (proposals map)	
South Bucks	S: 9/2007 A: 11/2008			
Brighton and Hove	S: 7/2008 A: 10/2009	S: 2011 A: 2013	S: 11/2009 A: 1/2011	
Wealdon	S: 1/2009 A: 2/2010		S: 7/2010 A: 2/2012	
Test Valley	S: 11/2007 A: 5/2009			
Winchester	S: 12/2007 A: 6/2009	S: 6/2010 A: 11/2011	S: 12/2009 A: 5/2011	

Maidstone	S: 6/2006 A: 8/2007		S: 6/2007 A: 6/2008 Afford housing A: 11/2006	
Sevenoaks	S: 9/2008 A: 12/2009	Beyond 2010		
Swale	Starts 2007		Local plan saved for 3 years	
Tonbridge	S: 9/2006 A: 2/2008	S: 9/2008 A: 12/2009	S: 9/2006 A: end 2008	
South Oxon	S: 4/2008 A: mid 2009			
Portsmouth	S: 8/2008 A: 10/2009		S: 1/2010 A: 3/2011	
Runnymede	S: 2/2006 A: 4/2007	S: 2/2007 A: 3/2008	S: 2/2007 A: 3/2008	
Surrey Heath	S: 1/2007 A: 2/2008	S: 1/2009 A: 2/2010	S: 1/2009 A: 2/2010	
Waverley	S: 9/2005 A: 9/2006	Subject to resource availability	S: 12/2006 A: 11/2007 (housing)	
Horsham	S: 11/2005 A: 3/2007	S: 9/2006 A: 10/2007		S: 1/2008 A: 7/2009
Windsor	S: 11/2006 A: 2/2008		S: 7/2008 A: 6/2010	
Kerrier	S: 6/2008 A: 10/2009	S: 4/2009 A: 11/2009	S: 4/2009 A: 4/2010 Area action plan	
Teignbridge	S: 11/2006 A: 12/2007	S: 2/2008 A: 3/2009	S: 10/2008 A: 12/2009 Area action plan	
Purbeck	S: 1/2007 A: 4/2008	S: 1/2007 A: 3/2008	S: 7/2008 A: 11/2009	
Stroud	S: 2/2008 A: 3/2009		S: 4/2007 A: 3/2008 Area action plan	
Tewkesbury	S: 11/2008 A: 2010	S: 10/2009 A: 2011	Site allocation starts 2009	
Sedgemoor	S: 2/2007 A: 1/2008	S: 2/2008 A: 3/2009	S: 11/2007 A: 9/2008	
South Gloucestershire	S: 2/2010 A: 4/2011			S: 10/2009 A: 12/2010

Taunton Deane	S: 3/2008 A: 10/2009	S: 6/2009 A: 11/2010	S: 6/2010 A: 12/2011	
North Wiltshire	S: 1/2007 A: 1/2008		S: 11/2007 A: 11/2008 Housing land	
Salisbury	S: 6/2008 A: 10/2009	S:10/2009 A: 3/2011	S: 9/2009 A: 12 2010	