

Local Plan – Policy H/RC: Gypsy and Traveller and Showpeople

In the absence of the delayed GTANA carried out by RRR, it is not possible to comment on the draft Local Plan beyond looking at the methodology and the broad strokes of Policy. We are participating in this consultation, to put down a marker showing our deep concern with the Council's policy, particularly in the face of the Police, Crime Sentencing and Courts Bill, which the 22 July 2021 Full Council Meeting noted specifically targets Gypsy and Traveller communities, effectively criminalising their way of life. It is therefore critical that Policy H/RC in this Local Plan, once adopted, safeguards these groups and provides both sufficient public and private sites/pitches as well as transit sites to meet their needs.

To this end, we ask that you consider the following points:

1 With reference to the Terms of Reference for the GTANA:

What are the terms of reference for the current GTANA being carried out by RRR?

How will RRR identify and address the needs of:

- Travellers who meet the PPTS definition for planning purposes;
- Those who do not but live in caravans on sites;
- Those living in bricks and mortar who might prefer to live on sites if they were available;
- Those permanently travelling;
- Those on Council sites (with only 2 sites providing 16 pitches each and low turnover rates);
- Those on the waiting list for sites (which is unacceptably long);
- Those on Private sites (which are the majority with many precariously housed or overcrowded).

The Policy H/RC states that current government policy aims to promote 'more' private provision. Will the mechanism for getting planning permission be improved.

Previously, this has been a tortuous, long drawn-out process, often ending in refusal for those residing on their own land. With Travellers either unaware, non-participants or outwith the ambit of Local Plan consultations, the fact that no sites were put forward for consideration during the two 'call for sites' is an indication of inefficiency and underlying racism.

2 With regard to Best Practice and Methodology

We refer to guidance by London Gypsies and Travellers "Best Practice for assessing the accommodation needs of Gypsies and Travellers".

We request a point by point breakdown of whether and where the methodology of the current GTANA follows – or does not follow – the guidance in this document:

[Reference: <http://www.londongypsiesandtravellers.org.uk/wp-content/uploads/2017/03/Best-Practice-for-Gypsy-and-Traveller-Assessment-of-Accommodation-Needs.pdf>]

3 With reference to NPPF criteria:

Policy H/RC also refers to NPPF criteria for the allocation of sites. Historically, Traveller sites have been placed under flyovers or roads, beneath phone masts, near sewage works or waste tips and near industrial estates. Of the two Council-run sites, the Blackwell Traveller Site in Milton is a case in point. Entered from the back of Cambridge Regional College under the A14, it is right by the sewage works and now subject to massive upheaval as a result of road improvements. This clearly runs counter to the NPPF criteria. No new sites have been proposed over many years and the District Council has been more concerned with the amenity of surrounding land and efforts to ensure that sites do not 'dominate' the nearest settled community. In planning law, the countryside and landscape character is of greater significance than the right to a home.

4 With reference to engagement with the affected community:

How does the Council propose to engage effectively with Traveller communities, representatives and other stakeholders and who will they be engaging with?

Under the heading '**What consultation have we done on this issue?**' there are little more than statements of good *intentions* to consult widely the Gypsy and Traveller community, the wider community and neighbouring authorities. No individuals, groups or organisations are named or any evidence provided. Who expressed these views and what lines of communication does the Council have with Gypsy and Traveller communities. In our experience, Cambridge City and South Cambs. have no representative organisations like those in Herts. or Essex, which can provide a Traveller perspective. This is what makes conversation so difficult with communities who experience systemic racism and discriminatory behaviour. They do not trust strangers bearing clipboards.

5 With reference to previous GTANAs

All GTANAs, with the exception of 2006 (lead by [REDACTED]), when the County was much more engaged and knowledgeable about educational and health needs and before austerity closed departments and eliminated jobs, have produced assessments that have been reduced downwards from those in 2006–10. The 2011 GTANA was a desktop exercise with no contact with Gypsies or Travellers and the 2016 GTANA conducted by Opinion Research Services (ORS) arrived at a need for zero pitches in Cambridge City and a surplus of 9 pitches in South Cambs. for the period 2016–36 based on a very small contact sample. This is contrary to the evidence of waiting lists and Traveller's testimonies.

6 With regard to the current GTANA

Until the current GTANA is completed, we won't have any idea how many in the community have been contacted or co-operated with the survey.

We therefore ask:

What response rate will be considered sufficiently robust to justify adoption of RRR's needs assessment? Will there be a public consultation period so we can read and comment on their recommendations?

7 With reference to '**Existing policies in the adopted 2018 Local Plan**'

These policies have failed to address need, despite their adoption, with no new provision of public, private or transit sites. There are no transit sites in all of Cambridgeshire. This raises the question of where families travelling for work or for hospital appointments are expected to stop? Even without the GTANA, there is obviously clear need as can be seen by the trail of S.61, S.77 and S.78 notices issued by the Council over the last two years. No additional pitches have been provided on the two Council-run sites, both with long waiting lists. We have seen the damaging effects of evictions of Travelling families on Council land in the City during Covid 19. Children, in particular, have suffered most and mental health within this community is poor. A primarily punitive response to 'unauthorised encampments' has been the norm alongside continuing refusal of planning permission on private sites.

How does the Council intend to mitigate this when the government passes its PCSC Bill most probably in early 2022?