

NORTH LINCOLNSHIRE COUNCIL

PLANNING COMMITTEE

PLANNING FOR TRAVELLER SITES: CONSULTATION

1. OBJECT AND KEY POINTS IN THIS REPORT

- 1.1 To inform members about the planning for traveller sites consultation paper.
- 1.2 To seek members approval to submit a response to the planning for traveller sites consultation.

2. BACKGROUND INFORMATION

- 2.1 Current national planning policy and guidance for Gypsy and Traveller and Travelling Showpeople sites is set out in Circular 01/2006 and Circular 04/2007. These are used by Local Planning Authorities, the Planning Inspectorate and Secretary of State to plan for traveller sites and make decisions about planning applications for traveller sites.
- 2.2 The government through this consultation considers the details of a proposed new single Planning Policy Statement (PPS) that will cancel and replace Circular 01/2006: Planning Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. The policy aims to put provision into the hands of elected local councils and will run until 6 July 2011. The new PPS will run on an interim basis until it is incorporated into the new National Planning Policy Framework.
- 2.3 The consultation document launches the draft of the proposed new policy statement, and includes a lengthy introduction and detailed impact assessments. The consultation draws attention to key issues, and acknowledges significant risks associated with the new policy, though there is a great deal of repetition which has to be worked through in order to clarify some significant issues.
- 2.4 Evidence suggests that the current circulars have not achieved their objective of significantly increasing the number of traveller sites with planning permission in appropriate locations over three to five years to address under-provision.

- 2.5 The Government proposes to retain the current planning definition of “Gypsies and Travellers” as this seeks to capture those with specific land use requirements arising from their current or past nomadic way of life. This is a definition based on lifestyle and not ethnicity and is different from the definition in the Housing Act 2004.
- 2.6 LPA currently has a duty to assess accommodation needs of travellers as part of their wider housing needs assessment. The government proposes to give local planning authorities the power to set their own targets for pitch/plot provision, based on robust evidence of local need in the light of historical demand.
- 2.7 The proposed policy does not specifically refer to the guidance that sets out how needs should be assessed for the purposes of the Housing Act (the Gypsy and Traveller Accommodation Needs Assessment guidance (GTAA)). Therefore the specific reference to GTAA will be removed and will be referred to instead as a “robust evidence base”. While it will still be necessary to ensure that the targets are evidence-based, there will be no specific guidance on how to achieve this, and councils will be able to reach their own decisions on the type and volume of evidence on which to rely. They will be expected to engage in a substantive consultation process at an early stage, and local development plans will be subject to Examination in Public – a process in which the development plan is reviewed by an independent planning inspector.
- 2.8 The paper states that existing policy is perceived amongst many that policy treats travellers more favorably than members of the settled community and the Government wants to see fair play with everyone been treated equally. Government proposals ask LPA to pay attention to early and effective community engagement with both settled and traveller communities when formulating their plans; meaning people are more likely to be supportive of development.
- 2.9 Councils will be required to set local pitch and plot targets and to identify specific sites that will support continuous development of accommodation for at least 15 years, coupled with the identification of ‘deliverable sites’ that will meet need in the first five years of the development plan. If a LPA has not planned for a five-year supply of traveller pitches/plots the draft policy asks them to “treat favorably” applications for a temporary permission. This is opposed to the current circulars that say “substantial weight” should be given to unmet need. The draft policy also asks if six months is the right time for a LPA to put in place five year land supply before the consequences of not having done so come into force.
- 2.10 While councils are encouraged rather than specifically required to collaborate on provision for travelling communities, it is made plain that the duty to cooperate, as set out at present in the Localism Bill will apply, with local planning authorities required to cooperate on the preparation of development plans with each other and with other bodies exercising statutory functions. The consultation paper does not specifically mention development plan documents

like the previous circular 01/2006 did in great detail. The guidance is therefore very vague on how deliverable sites should be allocated and whether this should be through a site allocations development plan document. It has been raised in the consultation response that the revised policy must provide specific guidance on this area; which should be consulted on so it is clear how sites will be allocated in the future.

- 2.11 The Government through the consultation is also bringing forward legislation that will apply the Mobile Homes Act (1983) to local authority traveller sites. This will give those living on authorised traveller sites improved protection against eviction and a secure home in line with residents of other residential mobile home sites.
- 2.12 The proposed PPS aims to provide stronger enforcement powers for councils. Strengthened enforcement powers will be made available to councils so they can tackle unauthorised development more effectively, helping to reduce community tensions. There will be stronger rights for residents of authorised council sites - travellers on official council sites will benefit from changes to legislation that will give them the same protection against eviction as residents on other mobile home sites and other rights and responsibilities. At the same time councils will be able to take action against any travellers who break the terms of their pitch agreements and they will be able to obtain possession orders with less risk of legal challenge.
- 2.13 Councils will be given incentives through the New Homes Bonus scheme to deliver new housing. This will include authorised traveller sites so that councils will get financial benefits for providing sites where they are needed. The Government is also providing £60 million of funding that councils and other registered providers can use to provide new authorised sites for travellers. Councils and other registered providers can apply to the Home and Communities Agency to use the funding.
- 2.14 The Government will provide £50,000 to support training for councillors about their leadership role in relation to traveller site provision and planning applications for sites. The aim is to raise awareness amongst councillors of their leadership role in relation to traveller site provision and planning applications for sites.

3. OPTIONS FOR CONSIDERATION

- 3.1 The main requirements of the consultation is to consider the proposed changes and respond via a questionnaire set out in the consultation paper therefore two options are identified below:
- 3.2 Option 1 – The Council submit a response to the proposed changes through completing the consultation questionnaire outlining the councils view on the draft PPS.
- 3.3 Option 2 – Do nothing and wait until the amended PPS is adopted without influencing its content.

4. ANALYSIS OF OPTIONS

- 4.1 Option 1 is the preferred option. The consultation considers the details of a proposed new, single Planning Policy Statement (PPS) that will cancel and replace Circular 01/2006: Planning Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. It is important that the council respond to the questionnaire to ensure our comments are presented to the government.
- 4.2 Option 2 is not considered to be an appropriate response as the council will miss the opportunity to influence the content of the amended PPS and this will have implications for the council's ability to deliver sites for Gypsies and Travellers in North Lincolnshire.

5. RESOURCE IMPLICATIONS (FINANCIAL, STAFFING, PROPERTY, IT)

- 5.1 Financial implications – There may be implications for finances that might be received through the New Homes Bonus Initiative.
- 5.2 Staffing implications – Staffing to implement this PPS will be drawn from existing resources within the Spatial Planning, Development Management, Property and Strategic Housing teams.
- 5.3 Property implications – The council may have to consider disposing of land in its ownership.
- 5.4 IT implications – There are no IT implications.

6. OTHER IMPLICATIONS (STATUTORY, ENVIRONMENTAL, DIVERSITY, SECTION 17 - CRIME AND DISORDER, RISK AND OTHER)

- 6.1 Statutory implications – The revised PPS will be a material consideration in determining planning applications and in preparing the policies and proposals in the North Lincolnshire Local Development Framework.
- 6.2 Environmental implications – The revised PPS continues to support the principle of sustainable development.
- 6.3 Diversity implications – There are no diversity implications.
- 6.4 Section 17 - Crime & Disorder implications – The policies of the LDF will ensure that new development is designed appropriately to minimise the opportunities for crime and to reduce the fear of crime.
- 6.5 Risk implications - There are no risk implications.

7. OUTCOMES OF CONSULTATION

7.1 Where appropriate, the comments of relevant council officers will be included in the consultation response.

8. **RECOMMENDATIONS**

8.1 The council submit a response to the consultation to the planning for traveller sites consultation as set out in Appendix A.

HEAD OF REGENERATION AND PLANNING

Pittwood House
Ashby Road
SCUNTHORPE
North Lincolnshire
DN16 1AB

Author: Elizabeth Pearson
Date: 6 June 2011

Background Papers used in the preparation of this report

Planning for traveller sites consultation April 2011

Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites

Circular 04/2007: Planning for Travelling Showpeople



Planning for traveller sites

Consultation response form

When complete please email to: travellerspps@communities.gsi.gov.uk

Alternatively, we would be happy to receive responses by post. Please send to:

Paul Williams
Planning – Economy and Society Division
Department for Communities and Local Government
1/G6 Eland House
Bressenden Place
London SW1E 5DU

The deadline for submissions is Wednesday 6 July 2011.

(a) About you

(i) Your details

Name:	Elizabeth Pearson
Position:	Spatial Planning Officer
Name of organisation (if applicable):	North Lincolnshire Council
Address:	Pittwood House, Ashby Road, Scunthorpe, DN16 1AB
Email:	elizabeth.pearson@northlincs.gov.uk
Telephone number:	01724 297585

(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response	<input checked="" type="checkbox"/>
Personal views	<input type="checkbox"/>

(iii) Please tick the *one* box which best describes you or your organisation:

Voluntary sector or charitable organisation	<input type="checkbox"/>	
Relevant authority (i.e. district, London borough, county council)	<input checked="" type="checkbox"/>	
Parish council	<input type="checkbox"/>	
Business	<input type="checkbox"/>	
Other public body (please state)	<input type="checkbox"/>	
Other (please state)	<input type="checkbox"/>	

(iv) Do your views or experiences mainly relate to a particular type of geographical location?

City	<input type="checkbox"/>	
London	<input type="checkbox"/>	
Urban	<input type="checkbox"/>	
Suburban	<input type="checkbox"/>	
Rural	<input type="checkbox"/>	
Other (please comment)	<input checked="" type="checkbox"/>	Urban and Rural

(vi) Would you be happy for us to contact you again in relation to this consultation?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

(b) Consultation questions

Q1. Do you agree that the current definitions of “gypsies and travellers” and “travelling showpeople” should be retained in the new policy?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Agree that this definition should be retained.

Q2. Do you support the proposal to remove specific reference to *Gypsy and Traveller Accommodation Needs Assessments* in the new policy and instead refer to a “robust evidence base”?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

The Gypsy and Traveller Accommodation Needs Assessments (GTAA's) are an invaluable evidence base for future policy in this area. The Government's invitation to local authorities to disregard them is a waste of resources, an abdication of evidence-based planning and will cause local barriers to inclusion.

The removal of the specific reference to a Gypsy and Traveller Accommodation Needs Assessment and instead refer to a 'robust evidence base' leaves it open to a number of different approaches being used locally and is very vague. The GTAA process compares favourably with surveys of the settled community (compares like with like). Robust evidence base needs a proper definition. There is consistency having the need for a Gypsy and Traveller Accommodation Assessment and these were developed using robust evidence and the Gypsy and Traveller Caravan counts provided by Local authorities. It would help if “robust evidence base” was elaborated upon so it is clearer to local authorities what would meet this requirement i.e local studies, illegal encampment details, historic data etc. The GTAA allows consistency throughout local authorities and by removing this leaves it very open as to what councils actually have to do with no specific guidance on how to do this. I believe the public's perception of “robust evidence base ” will differ from the LPA. Although Local planning authorities have a duty to assess accommodation needs of travellers as part of their wider housing needs

assessment but this will not be in as much detailed information as the GTAA provides. There needs to be an evidence base to set the figure. GTAA' are the most appropriate measure.

Q3. Do you agree that where need has been identified, local planning authorities should set targets for the provision of sites in their local planning policies?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Yes, where a need has been identified, local planning authorities should set targets in their local planning policies so it is clear how many sites the LPA must provide. This should ensure appropriate levels of sites for traveller communities are provided and met. This makes it clear to both the settled and traveller community exactly how many pitches are required and by when and assist in delivering authorised sites and reduce controversial unauthorised sites. However historically where targets have been set for local authorities to significantly increase accommodation for Gypsies and Travellers by 2011, recent research commissioned by the Equality and Human Rights Commission indicates that most local authorities are far from meeting this target (Equality and Human Rights Commission 2009). By setting targets these will not be achieved and this will not ensure that sites are being provided. The issue is finding suitable land which meets all the policy requirements which the settled community will not oppose, or object to.

Q4. Do you think that local planning authorities should plan for "local need in the context of historical demand"?

Yes	<input checked="" type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

Local need should be considered in the context of historical demand but not purely on its own. Current demand must be considered also due to the very nature of Gypsy and Travellers moving around and their needs change depending on their individual circumstances. Information i.e on current up to date unauthorised encampments could also be used to identify areas of need. However some thought needs to be given to those authorities that have consistently discouraged travellers so there is little or no provision, and because travellers are moved on quickly there is a perception of no demand. This unfairly pushes more demand onto neighbouring authorities and increases the likelihood of community tensions.

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Q5. Do you agree with the proposal to require local planning authorities to plan for a five-year supply of traveller pitches/plots?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Yes, this should in principle ensure that enough sites are identified and a continuing supply of pitches/plots is provided. This is also in line with other forms of housing as set out in PPS3. However the reorganisation of the requirement to develop a five year supply may lead to a short term reduction in available sites. However in reality we have a shortage of available sites and cannot deliver enough sites already so current experience shows us that we are struggling to get a 5 year supply.

Q6. Do you agree that the proposed wording of Policy E (in the draft policy) should be included to ensure consistency with Planning Policy Guidance 2: *Green Belts*?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Yes I believe this clarifies how Gypsy and Traveller sites will be assessed if they are proposed in a Green Belt and is consistent with PPG2.

Q7. Do you agree with the general principle of aligning planning policy on traveller sites more closely with that on other forms of housing?

Yes	<input checked="" type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

It is clear a key objective of the new policy is that applications for planning permission for traveller sites and for housing should be dealt with in exactly the same way. It is agreed that the planning policy on traveller sites should be aligned more closely with that of other forms of housing however it is recognised that Gypsies and Travellers are racial groups whose needs have generally been neglected. This is reflected in the lack of provision and illegal encampments. Therefore by aligning

planning policy more closely with other forms of housing may widen this gap. The Gypsy and Traveller Accommodation Assessments were a means of addressing these issues and a lot of valid information was gained from these assessments. Aligning planning policy on traveller sites more closely with that on other forms of housing may mean the particular needs of the Gypsy and Traveller Community are neglected further as the problems may not be specifically addressed.

Q8. Do you agree with the new emphasis on local planning authorities consulting with settled communities as well as traveller communities when formulating their plans and determining individual planning applications to help improve relations between the communities?

Yes	<input checked="" type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

I believe the intentions of this are good however in practical terms this is very difficult as every consultation the LPA has carried out has received a large majority of objections against any proposed sites. More needs to be done to promote Gypsy and Travellers way of life and to educate the "settled community" as there is strong local opposition founded on prejudice and misconceptions.

Through the LDF process when searching for Gypsy and Traveller sites many rounds of consultation with the public have been carried out and each time no suitable sites have been found or agreed upon. Rather than promoting inclusion, "localism" may mean that the prejudice of the local majority exacerbates the exclusion of Gypsies and Travellers.

There is a real risk that sites will not be provided where they are needed because of local opposition.

Q9. Do you agree with the proposal in the transitional arrangements policy (paragraph 26 in the draft policy) for local planning authorities to "consider favourably" planning applications for the grant of temporary permission if they cannot demonstrate an up-to-date five-year supply of deliverable traveller sites, to ensure consistency with Planning Policy Statement 3: *Housing*?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Agreement on these proposals are given as this may prevent/reduce unauthorised encampments and will encourage local authorities to demonstrate an up to date five year supply. Being consistent with PPS 3

is also necessary. By allowing temporary permissions the council is in a greater position to provide sites in suitable locations (ie Mill Lane). This will further reduce unauthorised encampments. It also allows sites to be provided when a shortage of sites is identified.

Q10. Under the transitional arrangements, do you think that six months is the right time local planning authorities should be given to put in place their five-year land supply before the consequences of not having done so come into force?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

Six months is a very short time span to allow LPA to get in place their five year land supply under the current planning regime. More time would be needed for LPA who have not got this in place as potential sites have to go through many stages of consultation before any specific sites can be identified and allocated. This is a timely and lengthy process which often takes longer than 6 months. However by setting a lengthy period of time could encourage delays and further conflict with the settled community on tolerated sites.

Q11. Do you have any other comments on the transitional arrangements?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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Q12. Are there any other ways in which the policy can be made clearer, shorter or more accessible?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Some of the policy aspects are still very vague. The removal of the reference to Gypsy and Traveller Accommodation Needs Assessment means that there is no consistency in the approach which will be taken by local authorities. Treating everyone in the same way may seem fair but issues regarding Gypsy and Traveller sites need specific attention as there is and has been a shortage of sites for a considerable length of time. This shows that this minority ethnic group needs specific attention in order to ensure their needs are addressed.

The consultation paper does not specifically mention development plan documents like the previous circular 01/2006 did in great detail. The guidance is therefore very vague on how deliverable sites should be allocated and whether this should be through a site allocations dpd. The revised policy must provide specific guidance on this area so it is clear how sites will be allocated in the future, and this should be consulted upon before the new policy is finalised.

Q13. Do you think that the proposals in this draft statement will have a differential impact, either positive or negative, on people because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation? If so, how in your view should we respond? We are particularly interested in any impacts on (Romany) Gypsies and (Irish) Travellers and welcome the views of organisations and individuals with specific relevant expertise. (A draft Equalities Impact Assessment can be found at Annex C.)

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

On the whole positive, following negative initial interim.

(c) Consultation questions on the impact assessment

The impact assessment is annexed to the consultation document. It is a consultation stage impact assessment, which analyses the costs and benefits of the policy options alongside the 'do nothing' baseline.

General questions about the impact assessment

Q1. Do you think that the impact assessment broadly captures the types and levels of *costs* associated with the policy options? If not, why not?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

There are significant existing risks that site provision will not be satisfied. The existing process has proved to be too cumbersome.

Q2. Do you think that the impact assessment broadly captures the types and levels of *benefits* associated with the policy options? If not, why not?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

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Q3. Are there any significant costs and benefits that we have omitted? If so, please describe including the groups in society affected and your view on the extent of the impact.

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Grant funding of (£60 million) nationally is inadequate to fund the provision for traveller sites.

Q4. Do you agree that the impact assessment reflects the main impacts that particular sectors and groups are likely to experience as a result of the policy options? If not, why not?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

Treating everyone in the same way may sound fair, but will not be where the planning system either excludes or allows decision makers to exclude, differences that ought to be taken into account.

Q5. Are the key assumptions used in the analysis in the impact assessment realistic? If not, what do you think would be more appropriate and do you have any evidence to support your view?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

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Q6. Are there any other relevant key sources of evidence relating to the policy or the effectiveness of the suggested options that have been omitted? If so, please provide details.

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

Not that we are aware of.

Q7. Are there any significant risks or unintended consequences we have not identified? If so, please describe.

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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Specific questions about the proposed policies in the impact assessment

Q8. Do you think there are any other benefits to retaining the existing policy (Option 1, do nothing), and whether these can be quantified?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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Q9. Can you identify – in quantitative terms if possible – whether you think there would be any benefits to Option 2 (withdraw circulars 01/2006 and 04/2007 and do not replace them)?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

The current circulars have not addressed the severe accommodation and welfare problems experienced by many Gypsy and Travellers however they do contain specific guidance and policy on how to address these issues. By not replacing these at all would leave a huge gap and would mean that the lack of accommodation for Gypsies and Travellers would not be addressed therefore the issue would only get worse. This would not meet Government's duty under the Human Rights Act 1998 to 'facilitate the gypsy way of life' or its duty under the Equality Act 2010 to promote equality of opportunity.

Q10. Please comment on whether you envisage any extra costs to local planning authorities associated with the assessment of need for traveller sites in their areas, over and above those which they experience at present.

Comment:

Public consultation will be costly to give any chance of sites coming forward. Consultation needs to be meaningful, thorough, timely and carefully managed. To overcome prejudice there is some need to educate the public of issues which Gypsies and Travellers have to deal with. This is likely to require more costly consultation methods like workshops, open days etc.

Q11. Please give your view on the scale of the time and money benefits which will accrue to local planning authorities as a result of being able to set traveller site targets locally.

Comment:

Having guidance through the Gypsy and Traveller Accommodation Assessment provided a consistent method which Local Authorities could use and provided clear guidance on what was needed. By removing this requirement a lot of time and money could be wasted on producing efficient and effective local evidence to set meaningful targets.

Q12. Please give your view on whether the transitional period envisaged will lead to any extra costs – and what those might be in monetised terms.

Comment:

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Q13. Please give your view on the extent to which, and rate at which, you consider new sites will come forward as a result of the new approach.

Comment:

It is believed the new policy approach will not speed up or encourage new sites to come forward and there is still the issue of identifying suitable sites which local communities will accept.

Q14. Is the draft policy likely to have any significant monetary benefit in terms of protection of the Green Belt, and, if so, what this is likely to be?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

This may discourage Gypsy and Traveller Communities to move onto Greenfield sites if the policy is changed as proposed. There is the potential cost to travellers of a refusal of planning permission for sites in Green Belt that may otherwise have been given permission. If the policy changes are made known to the Gypsy and Traveller Community then this should deter them moving onto Greenbelt.

Q15. Do the familiarisation costs estimated for local planning authorities appear reasonable? Please give your view on the assumptions made in this calculation.

Yes	<input type="checkbox"/>
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No	<input checked="" type="checkbox"/>
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Comment:

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Q16. Do the estimated administrative savings for local planning authorities, as a result of streamlining national planning policy, seem reasonable? Please give your view on the assumptions made in this calculation.

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

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Q17. Are there any significant costs and benefits that we have omitted? If so, please describe including the groups in society affected and your view on the extent of the impact.

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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Q18. Do you think that the draft policy is likely to have any impact, positive or negative, on travelling showpeople as an economic group?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment:

Unsure of whether combining the 2 circulars Gypsies and Travellers and Travelling Showpeople would work as these groups have different site needs. In the past Showpeople have resisted coming under the same cloak as Gypsies and Travellers.
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Q19. Are there any significant risks or unintended consequences we have not identified? If so, please describe.

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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Q20. Do you think there are any groups disproportionately affected?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comment:

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END