

*Planning for Gypsy and Traveller
Caravan Sites Circular
(ODPM 01/2006)*

Regulatory Impact Assessment

June 2006

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Regulatory Impact Assessment

Department for Communities and Local Government
Eland House
Bressenden Place
London SW1E 5DU
Telephone 020 7944 4400
Website www.communities.gov.uk

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Publication Centre
PO Box 236
Wetherby
West Yorkshire
LS23 7NB
Tel: 0870 1226 236
Fax: 0870 1226 237
Email: communities@twoten.com

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Purpose and intended effect

1. The guidance in the accompanying Circular, ODPM 01/2006, replaces planning Circular 1/94 (Gypsy Sites and Planning) and should be seen in the context of changes to the planning system introduced by the Planning and Compulsory Purchase Act 2004 and to be introduced on commencement of the relevant sections of the Housing Act 2004. The resulting policies are a significant material consideration in the drawing up of development plans and any planning cases involving Gypsies and Travellers.
2. The purpose of the policy is to ensure that the needs of Gypsies and Travellers are incorporated into mainstream planning and housing plans, therefore ensuring that their needs are considered within the context of local circumstances and helping mitigate the problems of unauthorised sites for both the Gypsy and Traveller and settled wider communities.

Objective

3. The intention is to make significant progress over the next 3-5 years towards ensuring that the planning system:
 - reduces the number of unauthorised encampments and developments and the conflict and controversy they cause and to make enforcement more effective where local authorities have complied with the guidance in the Circular;
 - promotes more private Gypsy and Traveller site provision. The Government's intention is that local authorities should make substantial efforts to meet identified need through appropriate development plan policies and by granting more applications in appropriate places, thus reducing the number of appeals against refusal of planning permission;
 - recognises the assessed need for caravan accommodation for Gypsies and Travellers, and thus help reduce or avoid their homelessness;
 - reflects the mainstreaming of Gypsy and Traveller accommodation within the wider social housing context, and support changes that will lead to the improvement of the health of Gypsies and Travellers, and that a greater certainty about where they may settle will provide more stable access to education and improve educational attainment;
 - is plan-led in relation to Gypsy and Traveller site provision, in the light of the Planning and Compulsory Purchase Act 2004 ("the Planning Act 2004") and the Housing Act 2004. The Government wishes to ensure that policies and criteria in local development documents are fair, reasonable, realistic and effective in ensuring that identified need is met.

Background

4. **This Regulatory Impact Assessment is intended to provide information relating to the English regions.** There has recently been an increase in the number of Gypsy and Traveller unauthorised caravans¹, (there were 3499 in July 2002 compared to 4082 in July 2005)² caused in part by a lack of approved sites, both public and private. In response the Government introduced provisions in the Planning and Compulsory Purchase Act 2004, to allow the use of temporary stop notices, and the Housing Act 2004, placing a duty on local authorities to consider the needs of Gypsies and Travellers when making a housing needs assessment. By altering the policy guidance contained in the circular we hope that the plan-led system can deliver more sites in appropriate places.

Rationale for government intervention

5. Evidence from successive caravan counts has shown that the existing Circular 1/94 “Gypsy Sites and Planning” has failed to deliver adequate sites for Gypsies and Travellers over the last 10 years. If the planning system does not meet the needs of Gypsies and Travellers the current rise in the number of unauthorised developments and encampments, with the accompanying enforcement costs, is likely to continue with a consequent impact on the whole community. As well as the potential damage to sensitive sites caused by unauthorised developments, those living on such sites are often restricted in their access to public services and at risk of being socially excluded. This in turn can lead to an increase in health problems or under-achievement in education.

Consultation

- i) Within government – the proposals have been agreed by the Domestic Affairs Committee.
 - ii) Public Consultation. There were 13 weeks consultation and the document was made available on the ODPM website. The document was sent to all local planning authorities, and 50 other organisations, individuals and Members of Parliament. 324 responses were received from local authorities, Parish Councils, Gypsy and Traveller support groups, Members of Parliament, other organisations and individuals. During the development of the new draft circular pre-consultation meetings were held with a range of stakeholders.
6. Overall the public consultation supported the recommendation of Option 3 for a new circular. There was concern about the potential costs of this for local authorities and we have attempted to address these in the final RIA. An example is that the provision of out-of-hours support for enforcement is now left to the local authorities discretion rather than being a requirement. Other responses asked that more consideration be given to the impact of the circular on the wider community and this has also been incorporated where appropriate. Finally a number of those commenting raised the issue of a statutory duty on local authorities to provide sites. The final RIA therefore considers this as a specific option.

1 Unauthorised encampments are where caravans are on land which is not owned by those on the land. Unauthorised development is where caravans are sited on land which is owned by those on the land but where they do not have planning permission for such use.

2 Figures from DCLG's Caravan Count.

Options

7. We have considered four options:

OPTION 1

8. Make no change to the current policy contained in Gypsy Sites and Planning, Circular 1/94, DOE; this is the “base case”.

OPTION 2

9. Abolish the Circular and have no special national planning guidance relating to Gypsy and Traveller site provision, and allow local authorities complete discretion.

OPTION 3

10. The preferred option is for better, improved guidance reflecting the recent changes to the planning system, that helps local authorities to better meet their responsibilities, and facilitates more Gypsy and Traveller sites in appropriate places. This guidance is intended to replace planning Circular 1/94 following the implementation of the Housing Act 2004 and the Planning and Compulsory Purchase Act 2004. The resulting policies are a significant material consideration in the drawing up of development plans and any planning cases involving Gypsies and Travellers. The purpose of the policy is to ensure that the needs of Gypsies and Travellers are incorporated into mainstream planning and housing provision, therefore ensuring that their needs are considered within the context of local circumstances and helping mitigate the problems of unauthorised sites for both the Gypsy and Traveller and the wider communities. Unlike the existing guidance it requires local authorities to specifically identify land (public and private) suitable for the establishment of sites rather than rely on private and public landowners making ad hoc applications. Under the new system when applications are now made there will already have been consideration as to whether the land is suitable and there will have been some prior assessment of the likely need for sites at local and regional level.

OPTION 4

11. Re-establish the statutory requirement to provide sites. There is some support for re-establishing the statutory requirement on local authorities to provide sites which was abolished in 1994. This would include the designation of authorities who meet the requirement who would then have enhanced enforcement powers.

Costs and benefits

Sectors and groups affected

- Gypsies and Travellers.
- Local Authorities.
- Regional Housing Boards & Regional Planning Bodies.
- Those living or working in areas where sites are or could be established.
- Organisations working with Gypsies and Travellers.
- Police Services.
- National Health and Education Services.

Rural impacts

OPTION 1: DO NOTHING

12. If the current trends as to the distribution of sites continue, the costs of dealing with the continuing rise in unauthorised sites, which is likely under this option, will fall disproportionately on rural districts.

OPTION 2: DEREGULATE

13. As with Option 1 the likely increase in unauthorised developments would fall disproportionately on rural areas, as would the cost of the greater number of court challenges we consider likely under this option.

OPTION 3: NEW CIRCULAR

14. The guidance in the circular applies to all local planning authorities and the Government expects all authorities, whether urban or rural, to make provision to meet the local need for sites. However it is likely that the need for new authorised sites will be greater in rural areas, and some authorities particularly those with large areas covered by restrictive designations such as the Green Belt may have some difficulties in identifying suitable land in their plans for Gypsy and Traveller sites.
15. On the other hand the burden of unauthorised sites and Gypsy and Traveller homelessness currently falls disproportionately on rural areas. The new circular should help to address these problems. Therefore we consider that overall this option will not have a significant negative rural impact.

OPTION 4: STATUTORY REQUIREMENT

16. This would re-establish the requirement for all local planning authorities, whether rural or urban to provide sites and would provide those authorities who meet their responsibility with additional enforcement powers. It is anticipated that the requirement would still be greatest in rural areas but could be more fairly shared if this requirement was reintroduced. This system however failed to deliver an adequate number of sites in the past. It also continues to treat Gypsies and Travellers as separate from the rest of the rural community which can be seen as discriminatory and could continue to promote

tension and a sense of one part of the community getting special treatment. Overall we think this represents an inflexible option which might not allow rural communities to deliver solutions reflecting local needs.

Race equality impacts

17. Whichever option is chosen will have a disproportionate impact on Gypsies and Travellers, as they are the only ethnic minorities that have a tradition of living in caravans. A recent Chartered Institute of Environmental Health report identifies that “Continually moving them (Gypsies and Travellers) from one local authority to another is financially wasteful and damaging to health – a bill which all society will have to pay” and “risks to health increase as the standards of amenities on sites worsen and are at their greatest on disorganised, crowded and unplanned sites.”
18. As has been noted above it is likely that Options 1 and 2 will result in an increase in community tensions due to unauthorised developments and encampments. These tensions help to stoke the prejudice that exists against Gypsies and Travellers in some sections of the settled population. Option 4 would continue to treat this community as separate from the mainstream and could also lead to greater tension and discrimination. We consider that Option 3 is the best way of promoting equality of opportunity for all sectors of the community as it allows all sections of the community to be considered as part of the mainstream planning and housing processes.
19. Planning authorities have their own duty to assess the race equality impacts of new or changed policies for which they are responsible, and to monitor these impacts and keep them under review. DCLG will similarly have in place monitoring systems to evaluate and review the race impact of this policy.

Health impacts

20. A study carried out by the University of Sheffield for the Department of Health found that the vast majority of Gypsies and Travellers considered that the ability to continue to be able to live a traditional travelling lifestyle was, ‘of fundamental importance and crucial to their sense of independence and autonomy’.³ The perceived barriers to maintaining their traditional lifestyle, including the lack of suitable sites, were seen as a major qualitative factor in the health inequalities faced by Gypsies and Travellers. It can also be argued that where there is more managed site provision plans can be made to provide adequate health services and allow more regular and managed use of these services with associated benefits to the Gypsy and Traveller community and the wider community. Resources would also be saved as preventative rather than emergency care could be given. Options 1 and 2 will do nothing to improve the current situation. Options 3 and 4 should result in more suitable sites being provided and therefore should have some positive benefits for the health and well-being of Gypsies and Travellers.

³ Glenys Parry et al. *The Health Status of Gypsies and Travellers in England: summary of a report to the Department of Health 2004* The University of Sheffield, School of Health and Related Research, p8, (www.shef.ac.uk/scharr/about/publications/travellers.html).

Breakdown of costs and benefits

Benefits

Economic

OPTION 1: DO NOTHING

21. Planners have had ten years experience of the existing guidance which should ensure that they are familiar with it, therefore there would be no need for authorities to invest in new training for existing staff. Therefore there would be no impact and no benefit is likely to be derived.

OPTION 2: DEREGULATE

22. By allowing local authorities greater discretion over decisions regarding the location of Gypsy and Traveller sites they may take better account of factors specific to the particular area in question. A more localised decision making structure should allow more flexibility and consideration of exceptional circumstances that national guidance may restrict.
23. If national guidance were removed, staff involved in assessing the suitability of Gypsy and Traveller sites would no longer require training for this guidance. This would reduce training costs and free up staff time for other work related duties.

OPTION 3: NEW CIRCULAR

24. New guidance requiring that planners consider the needs of Gypsies and Travellers should reduce the number of unauthorised encampments and developments. Data from the caravan count has shown that the total number of caravans on unauthorised encampments and developments increased by 37% between January 1997 and January 2005 to 3,558. Initial planning applications would still need to be considered but, because suitable land has already been identified and pre-application advice would be provided, the number of appeals would be likely to reduce. Those making applications would also have a clearer idea in the first place about what was likely to be acceptable. The greater certainty of gaining planning permission in locations identified for sites in DPDs should result in a decrease in litigation costs, and a reduction in the amount of legal aid granted to Gypsies and Travellers.
25. The costs of policing unauthorised encampments and developments and enforcing their removal should be reduced. According to the DCLG twice-yearly caravan count 66% of unauthorised encampments and developments were not tolerated in January 2005 meaning that enforcement actions were required on 2,341 caravans.
26. There are also indirect benefits. Gypsy and Traveller communities on authorised sites are likely to make a financial contribution to the local economy through local taxation, use of local services and businesses, and through reducing the burden on local authorities by providing and managing sites themselves.

OPTION 4: STATUTORY REQUIREMENT

27. This option would make enforcement more effective because adequate provision of sites should be available and therefore there would be less reason for unauthorised sites to be tolerated. It would also mean that planning cases could be more quickly dealt with, with a lower level of appeals for similar reasons to Option 3.

Environmental

OPTION 1: DO NOTHING

28. No benefits.

OPTION 2: DEREGULATE

29. It is likely, based on the existing difficulties faced by Gypsies and Travellers in obtaining planning permission for sites, that local planning authorities would adopt even more restrictive policies relating to sites in rural districts. This could result in an increase in unauthorised developments in Green Belt and or the open countryside, as fewer appropriate sites would be granted planning permission.

OPTION 3: NEW CIRCULAR

30. The environmental damage done by unauthorised encampments and developments should be reduced if the number of authorised sites is increased. In the case of environmentally sensitive land the damage done by unauthorised encampments and developments may have significant costs. This is because some environmental damage is irreversible or so costly to repair as to be effectively irreversible. In these situations the benefits from reducing unauthorised encampments and developments are likely to be large.
31. Unauthorised developments are also not subject to planning conditions that can help to mitigate the environmental damage caused by an authorised development. This would be another benefit of increasing the number of Gypsy and Traveller sites with planning permission.

OPTION 4: STATUTORY REQUIREMENT

32. The benefits are similar to Option 3, and as all authorities would have to provide sites there is the possibility that there might be a small increase in urban sites potentially reducing the impact in rural areas.

Social

OPTION 1: DO NOTHING

33. No benefits.

OPTION 2: DEREGULATE

34. By allowing local authorities greater discretion over decisions regarding the location of Gypsy and Traveller sites they may take better account of factors specific to the area in question. The benefit is that a more localised decision making structure should allow more flexibility and consideration of exceptional circumstances that national guidance may restrict.

OPTION 3: NEW CIRCULAR

35. An increase in the number of authorised developments should mean that the goals of the planning system are better met. If a Gypsy and Traveller site is developed with planning permission it will ensure that the planning system has had the opportunity to minimise any potential costs and to maximise its benefits.

36. A reduction in the number of unauthorised developments should result in a reduction in the tensions that an unauthorised development can cause within local communities.
37. Fewer unauthorised encampments and developments should ensure that those sites where Gypsies and Travellers are staying are better managed, monitored and suited to the needs of Gypsies and Travellers.
38. The lack of sites available on which Gypsies and Travellers can stay long term means that access to public services, such as education, is difficult. Average attendance at school for Gypsies and Travellers is well below the national average at 75%⁴. This attendance drops sharply for higher educational attainments. Attendance is at 47% for Key Stage 4 and less than 30% for education past the age of 16. Educational attainment is also lower than the national average. Only 42% of Travellers of Irish Heritage pupils, and 23% of Gypsy/Roma pupils have 5A* – Cs compared to the national average of 51%⁵. It is hoped this circular will result in an improvement in education outcomes which may in turn reduce social exclusion and improve employment opportunities for Gypsies and Travellers.
39. The new guidance should help deliver better outcomes for Gypsies and Travellers. Primarily this means reducing homelessness and offering Gypsies and Travellers greater stability.

OPTION 4: STATUTORY REQUIREMENT

40. Benefits could be similar to Option 3 as more sites would be developed. However by continuing to separate the Gypsy and Traveller community from the mainstream planning and housing systems there is a risk of continued discrimination and a feeling in the wider community that they are a burden and benefit from special treatment, leading to continued tension. There would be less flexibility for local solutions to be developed for particular local circumstances.

4 OfSTED report 2003.

5 Pupil Level School Census (PLASC)

Costs

Economic

OPTION 1: DO NOTHING

41. The rising trend in unauthorised encampments and developments suggests that the current guidance is not producing an ideal outcome. Indeed if current arrangements persist it is likely that unauthorised encampments and developments will continue to increase. This brings with it the associated costs of; enforcement actions, and appeals against them; policing; and the cost of clearing up environmental damage. These costs can be significant, an NFU survey of its members indicated that 35% of farmers incurred costs over £500 a year due to unauthorised encampments and 17% costs over £1,000 a year.⁶

OPTION 2: DEREGULATE

42. This option has many of the same costs as Option 1. It is likely that these will be greater in magnitude as a lack of national guidance will lead to it becoming more difficult for Gypsies and Travellers to obtain planning permission for new sites. This is due to local political pressure on elected representatives to resist the authorisation of new Gypsy and Traveller sites that arises in almost all localities.⁷ Therefore the number of unauthorised developments is likely to increase. However there are also some costs likely to be specific to this option.
43. By removing the national guidance and deregulating this part of the planning system there is the possibility that there will be an increase in the number of court challenges to local authorities' decisions. This is because there will be few other mechanisms to ensure that local authorities take proper account of the needs of Gypsies and Travellers when drawing up development plan documents and in making planning decisions. Judicial review is an expensive process, both in terms of money and staff time, and an increase in the number of challenges would also place added burdens on the Courts Service.
44. This option is less likely to offer satisfactory outcomes for Gypsies and Travellers. If their concerns are not integrated into the planning process through national guidance they may be ignored. As a result the problems of homelessness and inability to access health care and education may worsen.

OPTION 3: NEW CIRCULAR

45. Introducing new guidance would incur a number of small transactional and transitional costs, many of which are one-off costs. Staff would require re-training in the use of the new guidance which would have costs in terms of money and staff time. There will be some extra costs involved in identifying sites during the plan-making process. The period of time during which staff are becoming familiar with the new guidance may also incur costs in terms of reduced efficiency. In addition the physical act of issuing new guidance to local authorities by central government will incur a small cost. The Housing Act 2004 requires local authorities to include the needs of Gypsies and Travellers in their accommodation assessments so this Circular does not add on additional costs to those identified in that Act. All local authorities have an existing requirement to develop a statement of community involvement and this should include the Gypsy and Traveller community.

⁶ NFU extrapolate a total annual cost to farmers of £98 million from these figures, *Britain's Rural Outlaws* (November 2003) p 4.

⁷ See chapter 8 of the House of Commons ODPM Select Committee Report *Gypsies and Traveller Sites* HC 633-1.

OPTION 4: STATUTORY REQUIREMENT.

46. In order to establish a statutory requirement primary legislation would be required. It would then be necessary to set up a rigorous enforcement system to ensure that this was more effective than the previous statutory regime. The costs of requiring local authorities to establish sites was one of the reasons that this provision was abolished in 1994. The costs are the provision of the land, facilities and the ongoing management of sites. This would continue to place the emphasis on public provision of sites and not a mix of public and private provision. There is considerable central government funding available for new sites or to re-develop existing sites over the next 2-3 years from the Regional Housing Pot.

Environmental

OPTION 1: DO NOTHING

47. The likely rise in the number of unauthorised developments if the do nothing option is adopted will include a corresponding rise in the number of developments on environmentally sensitive land, without the mitigation measures that can be made a condition of planning permissions granted for such sites.

OPTION 2: DEREGULATE

48. There will be the same environmental costs as with Option 1 but they are likely to be of a greater magnitude because of the likelihood there will be an even greater number of unauthorised developments.

OPTION 3: NEW CIRCULAR

49. There may be a slight increase in the number of authorised developments in the open countryside. However this should be counterbalanced by a larger decrease in the number of unauthorised sites in unsuitable areas, such as Green Belt, through positive planning by authorities. New authorised sites will have been subject to the planning process, so any detrimental effects on the area should be mitigated as far as practicable, and any remaining harm will have been outweighed by other material considerations. Therefore there should not be any significant environmental costs due to the new guidance.

OPTION 4: STATUTORY REQUIREMENT

50. Similar costs to Option 3 but the need to provide public land might encourage local authorities to re-use land that they already owned rather than purchasing new land. This may enable them to use brownfield sites rather than the Green Belt, open countryside or other sensitive areas. However if the land that they owned was in a sensitive area, this may make the sites more vulnerable to authorised development to meet the statutory requirement, rather than the utilisation of more suitable private land.

Social

OPTION 1: DO NOTHING

51. Unauthorised sites are often less than ideal for Gypsies and Travellers themselves, both in terms of onsite facilities and access to public services. An ongoing failure to meet the growing need for suitable sites will also result in increasing levels of homelessness within the Gypsy and Traveller communities. Unauthorised developments also often result in an increase in tensions within local communities.

OPTION 2: DEREGULATE

52. Again there are likely to be the same costs as with Option 1 but of a greater magnitude due to the likelihood that this option would result in an even greater number of unauthorised developments.

OPTION 3: NEW CIRCULAR

53. There are likely to be no new social costs attached to this option.

OPTION 4: STATUTORY REQUIREMENT

54. The statutory requirement for local authorities to provide and manage sites could lead to other services and responsibilities being given less priority or funding. This would then impact on users of those services and potentially lead to more community tension.
55. It is worth noting that the pressure to reintroduce a statutory requirement has come, at least in part, from local authorities who believe that this would give them a clear priority, transfer the burden of making a politically sensitive decision away from local decision makers but will in our view create a greater overall burden on the public purse.

Risks

OPTION 1: DO NOTHING

56. This option risks allowing the current problems to become worse.

OPTION 2: DEREGULATE

57. This option increases the risk of appeals to planning decisions. There is also a serious, and probable, risk of allowing the current problems to become worse.

OPTION 3: NEW CIRCULAR

58. The risks associated with this option concern the manner in which the new guidance is interpreted. There is the possibility that the new emphasis on Gypsies and Travellers' needs may result in planners not giving full weight to other material considerations. There is also the risk that planners do not implement the recommendations of the new guidance and that the current decision making process remains unchanged. These risks could be mitigated by effective training in the new guidance. The guidance will also clearly state the case for compliance and will encourage local authorities to comply as early as possible. The guidance stresses the need for equal treatment of Gypsies and Travellers and the settled population in the planning system.

OPTION 4: STATUTORY REQUIREMENT

59. The risks associated with this are that local authorities will be unable and/or unwilling to develop sufficient sites and this could result in greater intervention being necessary from central government. Potentially greater legal costs could arise from challenges to decisions or a failure to meet a requirement. The requirement would be seen as being imposed on local decision makers rather than being an appropriate response to local needs.

Consultation with small business: the Small Firms' Impact Test

60. We have consulted with the Small Business Service and they concur with our view that a significant impact on small firms seems unlikely.

Competition assessment

61. The competition filter test indicates that the proposals will have no effect on competition.

Enforcement, sanctions and monitoring

62. There are no statutory enforcement or sanction measures associated with three of these options. Option 4 would require sanctions to be placed on local authorities who did not comply, and would require local and central monitoring systems to be set up.
63. Under Option 3, the new planning process will begin by local authorities assessing the need for Gypsy and Traveller residential pitches as part of the accommodation assessment process. Guidance on accommodation assessments will set out a baseline of factors which should be considered when assessing the accommodation needs of the Gypsy and Traveller community, as well as a recommended methodology for carrying out the assessment.

64. The policies in development plan documents (DPDs) will be tested thoroughly during the independent examination of the DPD. One of the tests of soundness of a DPD will be whether it is founded on a robust and credible evidence base, this will provide an adequacy test on the accommodation assessment underpinning site allocations. Under the Planning Act 2004, the Secretary of State can consider the adequacy of provision in DPDs, and can direct local authorities to make adequate provision for Gypsies and Travellers where this has not been included. The DCLG is already actively using this power.
65. Local authorities should consider whether the absence of existing provision may prejudice enforcement action or give rise to an appeal against refusal of an application for a new site.

Monitoring, review and post implementation review

66. The impact of the new guidance in the circular will be evaluated by monitoring the annual caravan count, the number of planning appeals and by the examination of local plans and their implementation.
67. The effectiveness of this circular will be reviewed when local authorities have implemented the framework. This will take place over the next 3-5 years.

Implementation and delivery plan

68. The circular sets out the framework for implementation. The implementation will then be monitored as set out above. In summary, local authorities will be expected to incorporate the requirements of the new guidance in development plan documents from now on. We anticipate that it will take 3-5 years for all local authorities to go through this cycle. However, the guidelines encourage local authorities to take early action, as there will be benefits to local authorities and communities of doing so.

Summary and Recommendation

69. Option 1, retaining the existing guidance, would have the benefit that the current system would be unchanged and staff would not need training. However the costs to the Gypsy and Traveller and settled communities would remain and the associated tensions within communities would continue. Cancelling the existing national guidance, Option 2, would have the potential benefit of making local decision making more sensitive to local issues and concerns that may run counter to national norms. However it is thought likely to exacerbate existing problems due to political pressures on elected representatives to restrict development by Gypsies and Travellers. Option 2 would also be likely to result in an increase in the number of court challenges with all the attendant costs to both local authorities and the Courts Service. We consider that the costs of Option 2 far outweigh its benefits.
70. Option 4, re-introducing a statutory requirement, would be costly in terms of introducing a regulatory regime and would place a greater burden on the public purse in terms of local authorities developing and maintaining sites. Although it would give local authorities a clear requirement to make adequate provision which has some clear benefits, it would reinforce the social issues of separating the Gypsy and Traveller community from the wider community and would reduce the ability of local authorities to develop local solutions sensitive to the needs of the local situation. It would also make it less likely that a mixed economy of provision would develop, as is the case with the settled community.
71. We consider that the new circular, Option 3, will lead to an increased number of Gypsy and Traveller sites being delivered by the planning system. This should reduce the number of unauthorised developments with their attendant costs and risks of increased tensions within local communities. The new circular should also ensure that more Gypsies and Travellers will be able to find sites that are suited to their needs and lifestyle. In our opinion these benefits outweigh the transitional costs of introducing the new guidance.

Declaration and Publication

I have read the regulatory impact assessment and I am satisfied that the benefits justify the costs

Signed

Date

Yvette Cooper, Minister of State, DCLG

Contact point

Gypsy and Traveller Unit
DCLG
Zone 1/F8
Eland House
LONDON
SW1E 5DU

email: gypsies@communities.gov.uk