



STRATFORD ON AVON DISTRICT GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT: 2014 UPDATE



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2014 Update

The Study

1. Opinion Research Services (ORS) and Peter Brett Associates (PBA) were commissioned by Stratford on Avon District Council to undertake a Gypsy and Traveller Accommodation Assessment in 2011.
2. Since the original report the government has released new planning guidance relating to Gypsies and Travellers in March 2012 in the form of Planning Policy for Traveller Sites which superseded Circular 01/06. Given the update to planning policy and also that the Stratford on Avon Gypsy and Traveller Local Plan is due to be developed, this study updates the accommodation assessment.
3. In particular it draws on a range of recent developments in the modelling of Gypsy and traveller accommodation need. In March 2014 the CLG Minister, Brandon Lewis wrote to Andrew Selous MP to clarify issues around household formation rates for Gypsies and Travellers. This report updates the needs assessment in light of this clarification.
4. Recent planning decisions across the country have focused strongly upon households in bricks and mortar and concealed or doubled up households on existing sites. ORS have taken this opportunity to revise the evidence base in Stratford on Avon District in light of these decisions.
5. ORS approach to undertaking Gypsy and Traveller Accommodation Assessments has evolved in recent years and relies less on survey data. We have utilised some of the findings from the household survey from the 2011 assessment, but have tied this to up to date information on the sites in Stratford on Avon District.
6. This report shows the fully reworked calculations using June 2014 as the baseline date. Stratford on Avon's Gypsy and Traveller Local Plan will run from 2011-2031. To cover the period of the Local Plan, any need which has developed in the period 2011- June 2014 is represented in the current need figures. Therefore, the need for 2014-2031 includes any backlog which has arisen since 2011.
7. **Appendix A** provides an updated full list of known Gypsy and Traveller sites in June 2014.

Updated Needs Modelling

8. This section focuses on the extra pitch provision which is required in Stratford on Avon District in the next 17.5 years to 2031 in 5 year periods. This includes both current unmet needs and needs which are likely to arise in the future.
9. To identify current and future need, the March 2012 CLG guidance 'Planning Policy for Traveller Sites' requires an assessment for current and future pitch requirements, but does not provide a suggested methodology for undertaking this calculation. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue for residential pitches is to compare the supply of pitches available for occupation with the current and future needs of the households. The key factors in each of these elements are set out in the sections below:

Supply of Pitches

10. Total additional supply is:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within the study period.

Current Need

11. Total current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space available in the study area, is made up of the following. It is important to address issues of double counting:

- » Households on unauthorised sites for which planning permission is not expected.
- » Concealed or doubled-up households.
- » Households in bricks and mortar wishing to move to sites.

Future Need

12. Total future need is the sum of the following three components:

- » Households living on sites with temporary planning permissions.
- » New household formation.
- » Net-migration.

Supply of Pitches

13. **Appendix A** shows the known sites and pitches in Stratford on Avon District. This shows that there are a total of 30 pitches on public sites and 15 permanent pitches on private sites, 26 pitches on sites with temporary planning permission and 3 pitches which do not have planning permission. The next stage of the process is to assess how much space is, or will become, available on existing sites. The main ways of finding this is through:

- » Current empty pitches
- » New sites or site extensions which have already been granted permission, or are likely to gain planning permission in the foreseeable future, or sites which are likely to come back into use following refurbishment.

14. All public site pitches are occupied and there is a waiting list for the site. For private sites, the site at Warwick Road. Blackhill has permission for 4 pitches, but has not been occupied. Meanwhile, 3 pitches, including 1 with a personal consent, at Rainbow Nurseries are also vacant. However, we have taken a cautious view of these sites because they could either be left empty or could be sold to anyone across the country, generating in-migration, so we have not included them as vacant space within this study. However, if they can be brought back into use they could address some of the current and future needs.

15. We would also note that the on-site survey in 2011 revealed no pitches occupied by non Gypsy and Traveller households. ORS have commonly seen the sub-letting of sites across the country to non Gypsy

and Traveller households, but there is no evidence that this has occurred in Stratford on Avon District. Therefore, overall we have counted no additional supply in the district.

Additional Pitch Provision: Current Need

16. The next stage of the process is to assess how many households are currently seeking pitches in the area. Groups of people who are likely to be seeking pitches will include those:
- » Households on unauthorised developments for which planning permission is not expected.
 - » Concealed or doubled-up households.
 - » Households in bricks and mortar wishing to move to sites.

Current Unauthorised Developments

17. At the time of the household survey in 2011 there were 32 caravans from 11 households on a site at Friday Furlong. The Friday Furlong site is understood to have historically been in agricultural use, primarily as orchards but developed into strips of land used as allotments in a number of ownerships. The site was probably first occupied by Travellers in the early 1970's.
18. The caravan count shows that the number of caravans fluctuated between 2005 and February 2013, with some caravans tolerated and others not. The site was granted outline planning permission for 145 dwellings, a medical centre and open space in February 2009, with development commencing in 2013. The last Travellers are understood to have left the site in late 2013.
19. Warwickshire County Council's Gypsy and Traveller Liaison Officer has confirmed that four families moved onto the site at Greenacres in Bidford and the occupants of the Croft Lane site at Temple Grafton (5 pitches) were also previously at the Friday Furlong site. Other former occupants of the Friday Furlong site are understood to have left the County. Therefore, all households who were on Friday Furlong have been accounted for in the calculation already and do not need to be counted again.
20. In June 2014 Appendix A shows 2 households on unauthorised developments that are long-term tolerated sites. Therefore, they do not need to be counted as need because the council cannot enforce against them. In addition to the two long term tolerated sites there is an on-going appeal that is also potentially relevant. The appeal relates to a site for one pitch which is on a site straddling the boundary between West Oxfordshire District and Stratford on Avon District, land known as 'Briars, London Road, Little Compton.' The application was refused by Stratford on Avon District Council in July 2013.
21. The applicant appealed against refusal and also submitted a statement to the appeal arguing that he is a Romany Gypsy. The appeal was on-going at the time of this study and a precautionary approach has been taken. The site has been included in the GTAA 2014 Update as an unauthorised development. This is done without prejudice to the outcome of the appeal.

Concealed or Doubled-Up Households

22. A concealed household is one who is living within another household and would wish to form their own separate family unit, but is unable to do so because of a lack of space on public or private sites. The Pathlow public site has capacity for 30 pitches and 44 caravans and has never exceeded this number in the caravan count. As noted earlier there are 15 pitches on private sites in Stratford on Avon District, but 7 of

these are vacant. However, one site at Greenacres in Bidford has permission for 8 pitches and 16 caravans, but has frequently been over-occupied. In February 2014 there were 20 caravans on the site. Therefore, there is a clear case for including some households on this site as being concealed. There are also 26 pitches on sites with temporary permission and recent caravan counts have shown these sites as typically being under their capacity as set out in their planning permissions.

23. The Regional Spatial Strategy used a concealed household rate of 7.5% and this figure was also used in the 2013 Warwick Gypsy and Traveller Accommodation Assessment. Using a 7.5% concealed household rate for Stratford on Avon District would lead to an assumption of 5 concealed households. On the basis that there should only be 8 households on the Greenacres site, but up to 20 caravans have been recorded there is a clear case for adding a small number of concealed households across the district. Therefore, we have added 5 households as being concealed. This is probably a generous figure, but should allow all households seeking their own accommodation to get it.

Bricks & Mortar and Waiting Lists

24. Failure to identify households living in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. The 2011 UK Census of Population identified a population of 59 Gypsy and Traveller households in the whole of Stratford on Avon District. This is likely to be an under-estimate of the total population due to some Gypsies and Travellers not declaring their ethnic status or completing the Census at all.
25. During the original assessment in 2011 ORS went to **disproportionate** lengths to identify Gypsies and Travellers living in bricks and mortar and worked with stakeholders, Council officers and on-site interviewees to identify households to interview. This process yielded one interview and that household did not wish to move to a site.
26. We would also note that it would be possible for the Council to undertake an extremely expensive process to try and identify all households in bricks and mortar. However, the National Planning Policy Framework requires councils to use a proportionate evidence base and the new National Planning Policy Guidance, Section 3, para 1 recommends:

'Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc. and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base'.

27. On this basis we sought a more pragmatic approach to identifying the needs of households in bricks and mortar. Warwickshire County Council's Gypsy and Traveller Service Manager reviewed the site waiting list in June 2014. There are 33 people on the list with the longest time on the list dating back to February 2004.
28. Contact was sought with all 33 households. Of these, 12 contact numbers did not belong to the same owner, or did not exist at all and a further 17 households were not contactable. Of the 4 households who could be contacted, 2 confirmed that they no longer wanted a place on the Pathlow site, while 2 did still want a place. ORS have reviewed the waiting lists for West Sussex and Essex County Councils and have found a very similar situation with most households being uncontactable, no longer wanting to be on a site, or already in a situation where they are being counted as need for another reason.

29. Stratford on Avon District Council officers are aware that 4 of the people are definitely within Stratford on Avon District on sites with temporary planning permission. Given that temporary planning permissions are counted elsewhere as need in this report they do not require to be counted again here.
30. Therefore, the Pathlow waiting list contains no known households in bricks and mortar in Stratford on Avon. Of the 33 households on the list, 12 could not be offered a place on the site because they have no current contact details, 4 are on sites with temporary planning permissions and 2 have confirmed that they do not want a pitch on the site. One household who still wants a pitch is outside the district and the current circumstances of the remaining 14 households are not known, but they are not believed to be in Stratford on Avon District.
31. The on-site survey in 2011 indicated no household wished to move to bricks and mortar. Stratford on Avon District have reviewed their housing waiting list and 3 households currently in bricks and mortar wish to move to alternative bricks and mortar accommodation. However, no one on-site is currently on the waiting list for housing, so we have assumed that no one leaves sites for housing.
32. Therefore, overall we have set the net movement from bricks and mortar to sites at zero. This reflects no known households wishing to move in either direction. Any household on the waiting list and potentially wanting to move to the Pathlow site are counted elsewhere as need in Stratford on Avon District or are outside the area and are likely to have been counted as need in other assessments.

Additional Pitch Provision: Future Need

33. The next stage of the process is to assess how many households are likely to be seeking pitches in the area in the future. There are three key components of future need. Total future need is the sum of the following:
- » Households living on sites with temporary planning permissions.
 - » New household formation expected during the study period.
 - » Migration to sites from outside the study area.

Temporary Planning Permissions

34. Stratford on Avon District has 26 pitches across 5 sites. While recent caravan counts indicate that some of these sites are under capacity, particularly the 16 pitches at Darlingscott, we have taken the decision to include all 26 as future need. Caravan counts can under-represent the number of households using a site. The Darlingscott site has been assessed as 1 Band G Council Tax property and not 16 individual properties and therefore it is not possible to check if any pitches are listed as empty from this source.

New Household Formation

35. It is recognised that an important group for future pitch provision will be children and young adults from existing households who will wish to form their own households in future years. Historically studies of Gypsy and Traveller population have assumed a net growth in household numbers of 3.00% per annum. However, the UK Census of Population 2011 and ORS' own national survey data both indicate the net population of Gypsies and Travellers grows at a rate which could be below 1.50% per annum.

36. More recently in a letter dated 26th March 2014 Brandon Lewis MP, the Parliamentary Under Secretary of State for the Department for Communities and Local Government, clarified the Government's position on household formation rates and stated:

'I can confirm that the annual growth rate figure of 3% does not represent national planning policy. The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure, though in some cases we are aware that inspectors have, in considering the level of unmet local need when demonstrating specific traveller appeals, used the 3% growth rate figure in the absence of a local authority's own up-to-date assessment of need.'

37. We agree with the position being taken by CLG and firmly believe that any household formation rates should use a robust evidence base, rather than simply relying on precedent. The household formation rate that ORS will use for this study will be based on the overall national picture tied to the site surveys from 2011. In addition a range of new household formation rates from 1.50% to 3.00% has also been considered.
38. ORS have produced a detailed separate paper 'Household Formation Rates for Gypsies and Travellers: Technical Note'. Officials from Communities and Local Government have seen the technical note and confirmed that they have not undertaken any research on population or household growth for Gypsies and Travellers, and therefore have no information which contradicts this position.
39. The household survey in 2011 for Stratford on Avon District indicated an age profile for the population which is slightly younger than that typical of those obtained elsewhere by ORS. The on-site surveys indicated 44% of household residents are under 16 years of age. This figure is probably an over-estimate because a third of pitches did not contain an adult male and while some of these were females aged over 60 years, many were younger females with children. In these cases males may be away travelling and therefore were not recorded by the survey. If they were added to the survey then the proportion of children in the population would fall. We would note that the 2011 Census for Stratford on Avon District shows that 35% of Gypsies and Travellers were aged under 16 years, which is in line with the national average.
40. However, based on an on-site proportion of 44% aged under 16 we consider **2.50%** growth per annum to be the most sensible long-term planning position given that the evidence for the wider population is as low as 1.50% per annum. We see no case for a figure above 2.5%, while a figure as low as 2% could be considered. ORS considers that a 2.50% per annum rate will provide enough pitches to accommodate all newly-forming households in Stratford on Avon District. The 2.5% covers gross formations minus any pitches freed due to dissolution of households due to death.
41. The household formation rates are based upon 72 households in Stratford on Avon District (45 authorised pitches + 26 temporary pitches + 2 long-term tolerated pitches + 1 unauthorised development + 5 concealed households - 7 pitches which are vacant).
42. Based on a new household formation rate of 2.50% we estimate that a total of **39 net additional pitches** will be required during the 17.5 year study period to 2031 as a result of new household formation, assuming that each forming household will require a pitch of its own.

Figure 1
Household Formations for Stratford on Avon District 2014-2031

Growth rate per annum	Net Future household formation
1.50%	21
1.75%	26
2.00%	30
2.25%	34
2.50%	39
2.75%	44
3.00%	49

In-migration from Other Sources

- 43. The most complicated area for a study such as this is to estimate how many households will require accommodation from outside the area. Potentially, Gypsies and Travellers could move to Stratford on Avon District from anywhere in the country. It has been noted that a weakness of many Gypsy and Traveller Accommodation Assessments conducted across the country has been that they either allowed for out-migration without in-migration, which led to under-counting of need, or they over-counted need by assuming every household visiting the area required a pitch.
- 44. Currently one household who reside in Bromsgrove are seeking to develop a single pitch in Stratford on Avon District, while the household survey in 2011 indicated that one household wished to move to another area. It is also the case that some households from Friday Furlong left to move to neighbouring local authorities.
- 45. Typically, ORS allow for a balanced level of migration. The advantage of allowing for net migration to sum to zero is that it avoids the problems seen with other Gypsy and Traveller Accommodation Assessments where the modelling of migration clearly identifies too low or too high a level of total pitch provision. An assumption of net nil migration implies that the net pitch requirement is driven by locally identifiable need.
- 46. This issue has been raised at a number of planning appeals and inquiries and ORS have demonstrated that in order to include a component for net in-migration need there is also the requirement to identify where out-migration will occur from.
- 47. There are three main sources of out-migration. Historically, London has seen a loss of Gypsy and Traveller sites and this has seen population displaced to areas across the country. However, ORS are currently working with a number of London Boroughs including Camden, Lambeth, Bexley and also the London Legacy Development Corporation to undertake their GTAA's. In all cases the authorities have been advised by their Planning Inspectors to undertake these studies and to meet the needs identified before their Local Plans can be found to be sound. Therefore, the Planning Inspectorate is requiring London Boroughs to assess needs and provide sites, which should prevent, or significantly limit any future out-migration.
- 48. The second potential source of out-migration is from local authorities with significant areas of Green Belt. A Ministerial Statement in July 2013 reaffirmed that:

'The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for

traveller sites or for conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development in the Green Belt.’

49. However, while this reaffirmation of policy states that Green Belt development is likely to be inappropriate, it does not remove the requirement for local authorities with Green Belt to assess their needs and to provide pitches. There is a requirement for local authorities who have difficulties in meeting their own local need in their own area to work with neighbouring authorities through the Duty to Cooperate process to have these needs met. It is not the place of the Gypsy and Traveller Accommodation Assessment to assume a particular authority will meet the needs of another and instead any authority unable to meet their own needs should work with neighbours to meet these. This process is already well established in general housing provision.
50. The final main source of out-migration is from the closure of unauthorised sites and encampments. There are several well documented cases of large-scale movement of Gypsies and Travellers following enforcement action against unauthorised sites – Dale Farm being a good example.
51. ORS will therefore assume nil net migration for the purpose of this study. Beyond this, rather than assess in-migrant households seeking to develop new sites in the area, ORS would propose that each case is assessed as a desire to live in the area and that site criteria rules are followed for each new site. It is important for the Council to have clear criteria-based planning policies in place for any new potential sites which do arise.

Overall Needs Arising for Stratford on Avon District

52. The estimated extra pitch provision that is required in the next 17.5 years will be **71 more pitches** to address the needs of all identifiable households. We again stress we have not counted 7 empty pitches as supply and have not assumed that any household will move from sites to bricks and mortar or out of the area.

Figure 2

Extra Pitches which are required in Stratford on Avon District from 2014-2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
Total Supply			0
Current Need			
Current unauthorised developments or encampments seeking to stay in the area	1	-	
Estimated concealed households	5	-	
Net movement from bricks and mortar and the waiting list	0	-	
Total Current Need			6
Future Needs			
Currently on sites with temporary planning permission	26	-	
Net migration	0	-	
New household formation	39	-	
Total Future Needs			65
	Total	71	0
			71

Split to 2031 in 5 year time period

53. In terms of providing results by 5 year time periods we have assumed that all sites with temporary permission and concealed household have their needs addressed in the first 5 years. Household formation is apportioned over time. In summary, Figure 3 sets out the net requirement for new pitch provision arising until 2031.
54. For Stratford on Avon's Gypsy and Traveller Local Plan any need which has developed in the period 2011-June 2014 is included in the current need. Therefore, the need for 2014-2019 includes any backlog which has arisen since 2011.

Figure 3

Extra Pitch Provision in Stratford on Avon District 2014-2031

Local Authority	2014-2019	2019-2024	2024-2029	2029-2031	Total
Stratford on Avon District	41	11	12	7	71

Site Delivery

55. ORS have consulted with CLG over issues such as whether paragraphs 47 and 159 of the National Planning Policy Framework apply to Gypsies, Travellers and Travelling Showpeople site provision and have been informed that they do not. ORS submitted a written question and received a verbal response to this query. However, a planning inspector at a hearing in Wokingham also confirmed that paragraph 47 of the National Planning Policy does not apply because it is not included in Planning Policy for Traveller Sites.
56. Therefore, there is no need for Stratford on Avon District to consider needs at their housing market area level or for them to have a 20% land supply buffer due to previous under-provision of pitches. The view of CLG is that they simply want local authorities to provide additional pitches to meet identifiable needs and that these pitches can be delivered through a variety of means and that delivery should be consistent with providing choices to the Gypsy and Traveller community.
57. HCA funding for additional pitches has now been allocated and there is no commitment to provide more beyond 2015. However, local authorities can still seek to deliver public pitches through Section 106 agreements with developers.
58. It is also possible to meet needs through working with land owners to develop private rented sites and if necessary allowing the households on these to meet the rents through the local housing allowance. Local authorities can also look at the disposal of their own land holdings to provide for either public or private sites.
59. It is also the case that local authorities can work with individual land owners to provide for small family owned sites.

Travelling Showpeople

60. At the time of the original assessment in 2011, no Travelling Showpeople sites were known in Stratford on Avon District. However, a site used by Travelling Showpeople has subsequently been identified in the district. The site is at Lower Langley Farm to the north of the town of Stratford upon Avon.
61. The site is owned and managed by the landowners who are themselves from a circus background. According to the owners, the site was bought in 1948 and has been used for the overwintering of circuses since 1951/2. The site is currently used by the Moscow State Circus. They need hardcore for the winter and buildings for maintenance. The site is also used as a headquarters for the show in the summer. There are three other shows affiliated to the circus – ‘Extreme Stunts’, ‘Circus of Horrors’ and ‘Circus Berlin.’ The operator indicated that these shows will also use the site if touring in the area.
62. The season runs from March through to November. Only the maintenance staff stay on in winter, comprising around 10 to 15 workers and their families. Children will attend local schools in the winter. The artists go back to Russia during the winter.
63. The current site amounts to about 3.5 acres (about 1.4 hectares). The operators indicate that ideally a site of 6 acres would help meet longer term needs. They are aware of the proposals in the Draft Core Strategy to allocate land, which includes Lower Langley Farm, for employment purposes. The proposed allocation is called ‘Land East of Birmingham Road’. The development would require the yard to be relocated.

64. The operators live in the area and would prefer an alternative site in the same general vicinity. They also indicate that the circus operators like the existing site because it has good access to the strategic road network. Given that maintenance staff and their families stay on the site over winter, there will also be a need to identify a site that can provide a suitable living environment.
65. Stratford on Avon District Council have agreed to work both with any potential developer of the land East of Birmingham Road and with the operators of the site at Lower Langley Farm to identify potential alternative sites. If necessary the Council will allocate a site within the Gypsy and Traveller Local Plan.

Appendix A: Traveller Sites in Stratford on Avon District (as of June 2014)

Gypsy and Traveller Sites in Stratford on Avon District

Site	Number of Pitches
Local Authority Sites	
Birmingham Road Pathlow	30
TOTAL PITCHES ON LOCAL AUTHORITY SITES	30
Private Sites with Permanent Permission	
Greenacres, Bidford	8
Warwick Rd. Blackhill	4
Rainbow Nurseries Welford on Avon	3
TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION	15
Private Sites with Temporary Permission	
Darlingscott, Shipston on Stour	16
Poolhead Lane, Tanworth in Arden	3
Mollington Lane, Warmington	1
Croft Lane, Temple Grafton	5
Gospel Oak Lane, Pathlow	1
TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION	26
Tolerated Sites – Long-term without planning permission	
Ardendane Manor Farm, Studley	1
Ooseland Barn, Bidford on Avon	1
TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES	2
Unauthorised Developments	
Briars, London Road, Little Compton	1
TOTAL PITCHES ON UNAUTHORISED DEVELOPMENTS	1
TOTAL PITCHES	74