

Stratford-on-Avon District Gypsy and  
Traveller Accommodation Assessment  
Update Study

Final Report

April 2019

*RRR Consultancy Ltd*







---

# Table of Contents

<b>Executive Summary</b> .....	<b>1</b>
<i>Introduction</i> .....	1
<i>Policy context</i> .....	1
<i>Population Trends</i> .....	2
<i>Stakeholder Consultation</i> .....	3
<i>Surveys of Gypsy and Traveller families</i> .....	4
<i>Accommodation need</i> .....	4
<i>Conclusions</i> .....	5
<b>1. Introduction</b> .....	<b>8</b>
<i>Study context</i> .....	8
<i>Methodological context</i> .....	8
<i>Geographical context</i> .....	8
<i>Stratford-on-Avon District</i> .....	10
<i>Definition Context</i> .....	11
<i>Summary</i> .....	13
<b>2. Policy context</b> .....	<b>15</b>
<i>Introduction</i> .....	15
<i>National Policies</i> .....	15
<i>Local Planning Policies</i> .....	18
<i>Duty to cooperate and cross-border issues</i> .....	21
<i>Summary</i> .....	23
<b>3. Trends in the population levels</b> .....	<b>25</b>
<i>Introduction</i> .....	25
<i>Population</i> .....	25
<i>Data on unauthorised encampments</i> .....	29
<i>Permanent residential pitches within the District</i> .....	29
<i>Travelling Showpeople</i> .....	30
<i>Summary</i> .....	30
<b>4. Stakeholder consultation</b> .....	<b>32</b>
<i>Introduction</i> .....	32
<i>Accommodation needs</i> .....	32
<i>Transit provision and travelling patterns</i> .....	33
<i>Barriers to provision</i> .....	35
<i>Relationship between Gypsies, Travellers and the settled community</i> .....	36
<i>Summary</i> .....	38
<b>5. Gypsies and Travellers residing on sites</b> .....	<b>40</b>
<i>Introduction</i> .....	40
<i>Residency characteristics</i> .....	42
<i>Satisfaction</i> .....	43
<i>Education and employment</i> .....	44
<i>Travelling</i> .....	44
<i>Accommodation need</i> .....	45
<i>Requirement for residential pitches 2019-2024</i> .....	46

---

---

<i>Requirement for residential pitches 2024-2035</i> .....	51
<i>Requirements for transit pitches / negotiated stopping arrangements: 2019-2035</i> .....	53
<i>Summary</i> .....	53
<b>6. Travelling Showpeople living on yards</b> .....	<b>54</b>
<i>Introduction</i> .....	54
<i>Residency characteristics</i> .....	54
<i>Satisfaction</i> .....	55
<i>Education and employment</i> .....	55
<i>Accommodation need</i> .....	55
<i>Requirement for residential pitches 2024-2035</i> .....	60
<i>Requirements for transit plots / negotiated stopping arrangements: 2019-2035</i> .....	61
<i>Summary</i> .....	62
<b>7. Conclusion and Recommendations</b> .....	<b>63</b>
<i>Policy Changes</i> .....	63
<i>Accommodation need</i> .....	64
<i>Facilitating new provision</i> .....	65
<i>Managing Gypsy and Traveller sites</i> .....	67
<i>The location of new provision</i> .....	68
<i>The size of new provision</i> .....	71
<i>Transit provision</i> .....	71
<i>Summary</i> .....	72
<b>Bibliography</b> .....	<b>75</b>
<b>Glossary</b> .....	<b>77</b>

---

---

---

# Executive Summary

## Introduction

- S1. In January 2019 Stratford-on-Avon District Council commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment Update Study (GTAAS) for the period 2019-2035. The results will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources.
- S2. The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers (DCLG, 2015).
- S3. To achieve the study aims, the research drew on a number of data sources including:
- Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2018) MHCLG Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Online surveys and a focus group with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Travelling Showpeople.
- Extensive face-to-face surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs. This key methodology determined an extensive range of data enabling accommodation needs to be determined

## Policy context

- S4. In August 2015, the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- S5. Given differences in defining Gypsies and Travellers the GTAA provides two needs figures: first, one based on ethnic identity definition, and a second based on the needs of families who have *not* permanently ceased to travel (i.e. based on the PPTS 2015 definition). In relation to site allocations, it is the accommodation needs figure based on those households who meet the ethnic definition of Gypsy and Traveller that this GTAA recommends is adopted by the local authority. This is because needs figures based only on households who do or do

not travel in a caravan are likely to underestimate need and be open to legal challenges. The ethnic self-identifying approach is similar to that used by the council to allocate pitches i.e. travelling does not form any part of the allocation criteria.

- S6. Subsequently, this GTAA recommends that the council endorses the PPTS 2015 based accommodation needs figure as its main figure, and the ethnic-based accommodation needs as a 'reserve' figure. The difference between the lower PPTS and higher ethnic-based needs figures are 8 pitches within the first five years, and 11 pitches over the period 2019-2035. This means that the council will first seek to provide 59 additional pitches for the period 2019-2035. If this accommodation need is met before 2035, the council will consider providing an additional 11 pitches up to 2035 i.e. a total of 70 additional pitches for the period 2019-2035.
- S7. In March 2016, the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that, when considering the need for caravans and houseboats, local authorities will need to include the needs of a variety of residents in differing circumstances including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- S8. The local authority planning policies outline the criteria by which the location of new Gypsy and Traveller accommodation should be determined. It is apparent that they consider it important to consider a range of factors including the sustainability of new sites e.g. proximity to local services, and the potential impact on the environment. However, it is likely that any revised local policies would reflect the findings of this GTAA. Current planning policies in relation to Gypsy and Traveller accommodation will be superseded by the new Local Plan policies based on evidence including this GTAA.

## Population Trends

- S9. There are 81 pitches within the District consisting of 30 local authority managed pitches, 44 authorised private pitches, 6 potential pitches (i.e. pitches that are currently being developed), and 1 pitch located on an unauthorised development. There are two private sites containing rented pitches whilst the remaining private sites are small, family owned sites. There are also two sites located within the District which have planning permission to accommodate Gypsy and Traveller households but did accommodate any such families during the survey. There is also one Travelling Showperson's yard located at Bishopton which has 6 plots in use as winter quarters.
- S10. There are two major sources of data on Gypsy and Traveller numbers in the District – the national DCLG Traveller Caravan Count, and local authority data. The DCLG count has significant difficulties with accuracy and reliability. As such, it should only be used to determine general trends – it is the survey undertaken as part of the GTAA which provides more reliable and robust data.

- S11. The MHCLG Caravan Count shows that the total number of caravans recorded in Stratford-on-Avon has increased steadily over the period January 2016 to July 2018. The MHCLG recorded 76 caravans in the District in January 2016 and 121 caravans in July 2018. The main difference is due to an increase in the number of caravans located on private authorised pitches from 29 in January 2016 to 77 in July 2018. When the population of the local authority is taken into account the density of caravans in Stratford-on-Avon is relatively high at 97 caravans per 100,000 population compared to the average of 71 caravans per 100,000 population for neighbouring local authorities. The 2011 Census recorded 173 people identifying as Gypsies and Travellers in Stratford-on-Avon with almost half residing in social housing.
- S12. The number of unauthorised encampments recorded within Stratford-on-Avon was very low averaging on 2 every 6 months over the period January 2016 to July 2018. Nonetheless, this GTAA recommends the adoption of a negotiated stopping policy which involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets.

### **Stakeholder Consultation**

- S13. Consultations with a range of stakeholders were conducted in January and February 2019 to provide in-depth qualitative information about the accommodation needs of Gypsies and Travellers. The consultation took the form of an online survey (completed by 40 stakeholders), a focus group and interviews. In recognition that Gypsy and Traveller issues transcend geographical boundaries and the need to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers from neighbouring authorities.
- S14. The consultation with key stakeholders offered important insights into the main issues within the District. It was generally acknowledged that there is a lack of permanent and transit accommodation provision throughout the county. A lack of spaces on some sites mean that families have to 'double up'. Gypsy and Traveller households prefer to be on the edge of communities and/or close to key transport routes. New sites should be accessible to health, education and other facilities. However, they should be located in areas which have the capacity to absorb additional demands for services.
- S15. The main barriers to delivering new sites were regarded as: the limited availability of appropriate sites; the financial viability of new sites and difficulties in financing new provision; competing and conflicting priority pressures for available sites. Another key barrier mentioned by stakeholders was the extent of Green Belt land within the District which constrains where potential sites can be located.
- S16. Despite areas of good practice there is still need for better collaborative and coordinated working between agencies within the county. The joint Warwickshire protocol on unauthorised encampments was cited as a good example of joint working between the county

council and local authorities. Also, the positive work of the Office of the Police and Crime Commissioner for Warwickshire (OPCCW) in relation to Gypsy and Traveller issues was acknowledged.

### **Surveys of Gypsy and Traveller families**

- S17. In February 2019 a total of 79 surveys were undertaken by *RRR Consultancy* with Gypsy and Traveller families including 70 out of 74 residing on permanent pitches (a 95% response rate), 8 households residing on unauthorised encampments during the survey period), and 1 survey with a household residing on a tolerated unauthorised development. The combination of local authority data, site visits and consultation with survey households helped to clarify the status of pitches i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues.
- S18. Most households residing on sites were related to one another. Also, most households had lived on their respective site since it was first developed and in some cases were born on the site. There are three generations of the same family residing on some sites, and in one case four generations. Household size on each pitch varied between 1 person and 8 persons. Around a third of survey respondents reside on local authority managed pitches, with the remainder consisting of a combination of privately rented pitches and small, family-owned sites.
- S19. The commitment of families to remain on existing sites is reflected in the fact that none intended to move in the future. Most survey residents were satisfied with site conditions although households residing on the local authority site were concerned about the condition of the utility blocks, lack of space on pitches, and the difficulty in getting repairs and maintenance undertaken. Households residing on both local authority and private sites were concerned about the high cost of electricity and difficulties in obtaining insurance.

### **Accommodation need**

- S20. Accommodation need for the District was assessed using analysis of primary and secondary data. The accommodation needs calculation steps were based on a model in accordance with both previous and current Practice Guidance issued by the Department of Communities and Local Government (DCLG). It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data.
- S21. Table S1 summarises accommodation need over the period 2019-35. It is important to note that the figures shown in Table S1 includes all need as of 2019, including any which may have been identified by previous GTAA's but remained unfulfilled by April 2019. The table shows that a further 70 Gypsy and Traveller pitches (based on the ethnic identify definition), and 59 pitches (based on PPTS 2015) are needed over the period 2019-2035 in Stratford-

on-Avon. There is also a need for 6 additional Travelling Showpeople plots over the same period. The main drivers of need are from 'hidden' households and new family formation.

Table S.1: Summary of accommodation needs 2019-35 (pitches/plots)

Period	Ethnic definition	PPTS 2015 definition	Travelling Showpeople Need
Total 2019-24	36	28	3
Total 2024-29	15	13	1
Total 2029-35	19	18	2
Total 2019-35	70	59	6

Source: GTAA 2019

- S22. In relation to transit provision, this GTAA recommends the adoption of a negotiated stopping policy which involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets.
- S23. The accommodation need can be addressed by expanding number of pitches permitted on existing private sites and/or providing new sites.

## Conclusions

- S24. It is recommended that the council incorporate both the PPTS and the ethnic calculations into their local plan. The council could work with the PPTS definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the council would firstly meet the need of 59 (28 within the first five years) as its obligation, but accept the need of a further 11 (8 within the first five years) as potential need in the area, if further applications are brought forward through windfall. It is important to note, that this only refers to Gypsies and Travellers and not Travelling Showpeople.
- S25. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

### *Planning policy:*

- Refine the criteria and processes for determining the suitability of Gypsy and Traveller sites, as indicated above for including in emerging/future Local Plans.
- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the small, privately owned sites to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To liaise with the Travelling Showpeople households with need to help identify land to meet their need.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.

- To consider alternative options for developing new sites such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller and Travelling Showpeople communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

*Management:*

- For the council to work more closely with the management team of the local authority site. There needs to be closer monitoring of the maintenance and management of the site including regular maintenance and health and safety checks. They also need to jointly review the condition and management of the site.
- Consider employing a coordinator who would support the needs of Gypsies and Travellers residing on the sites, in bricks and mortar accommodation, or on unauthorised encampments. The coordinator would be the first point of contact for Gypsies and Travellers and would liaise with relevant agencies and service providers.
- Housing organisations need to review the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide regular training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller communities.



# 1. Introduction

## Study context

- 1.1 In January 2019 Stratford-on-Avon District Council commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment Update Study (GTAA) for the period 2019-2035. The results will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources.
- 1.2 The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers (DCLG, 2015).

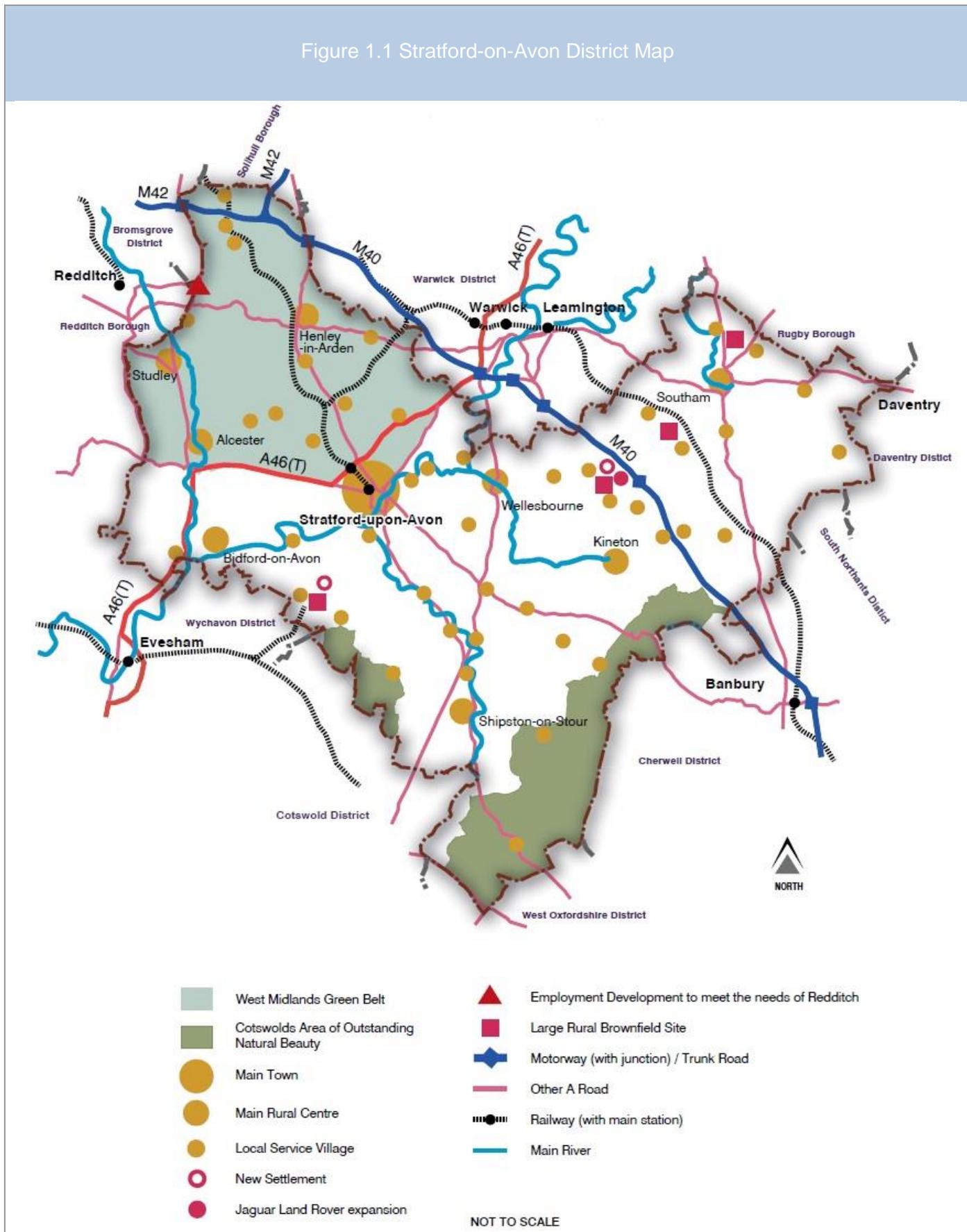
## Methodological context

- 1.3 To achieve the study aims, the research drew on a number of data sources including:
  - Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2018) MHCLG Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Online surveys, interviews and a focus group with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Travelling Showpeople.
  - Extensive face-to-face surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs. This key methodology determined an extensive range of data enabling accommodation needs to be determined.
- 1.4 The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

## Geographical context

- 1.5 The following is a map of Stratford-on-Avon District Council area showing main settlements, transport routes, and green belt and areas of outstanding natural beauty (AONB).

Figure 1.1 Stratford-on-Avon District Map



Source: Stratford-on-Avon DC Core Strategy 2016

## Stratford-on-Avon District

- 1.6 The estimated 2019 population of the District area is 124,300 people (ONS 2018). According to the Council's Core Strategy (2011)<sup>1</sup>, the District lies at the heart of England. Stratford-upon-Avon is the largest settlement within the District with a population of around 26,000. There are important rural centres including the attractive, small market towns of Alcester, Henley-in-Arden, Shipston-on-Stour, and Southam.
- 1.7 That the District is distinctively rural in character reflected in the fact that over 75% of its residents reside outside the main town of Stratford-upon-Avon, and 45% of residents live in parishes with a population of less than 3,000. Stratford-upon-Avon is a major tourist centre with over 2.5m day and overnight trips taking place to the town in 2017<sup>2</sup>. There are about 250 communities of varying sizes spread across the predominately rural area of 979 square kilometres. It is one of the largest Districts in lowland England with a low population density, making delivery of, and access to, services a major issue for residents.
- 1.8 Because the District covers such an extensive area, various towns outside its boundaries have a strong influence over how different parts of the area function. Royal Leamington Spa, Banbury, Redditch and Solihull all have large shopping centres, provide a range of employment opportunities, and support a variety of leisure facilities.
- 1.9 Most of the District to the north of Stratford-upon-Avon lies within the West Midlands Green Belt. The Cotswolds Area of Outstanding Natural Beauty extends into the southern fringes of the District. The heritage and built historic environment of the District is highly valued and contributes significantly to the identity and character of the area. It plays an important role in attracting visitors and tourists. However, the District is susceptible to flooding and was badly affected by the floods of 1998 and 2007. The Environment Agency has mapped the main areas subject to flood risk which cover a significant amount of land within the District.
- 1.10 In terms of strategic transport connections, the M40 and M42 both cross the District. The major local M40 junction (Junction 15) lies outside the District at Longbridge, near Warwick and is about six miles to the north-east of Stratford-upon-Avon. The only full M40 junction within the District lies at Gaydon (Junction 12) and serves a major MoD site (DM Kineton) and significant employment sites occupied by Jaguar Land Rover and Aston Martin Lagonda, as well as the wider rural area in the vicinity. There is a further restricted junction (Junction 16) with the A3400 north of Henley-in-Arden. On the M42, there is a full junction (Junction 3) with the A435 on the District boundary to the north of Redditch. The other strategic route is the A46(T) that crosses the District between Evesham and Warwick and forms the northern bypass to the town of Stratford-upon-Avon.

---

<sup>1</sup> Stratford-on-Avon DC Core Strategy 2011-2031 Adopted July 2016.

<sup>2</sup> TRS, Economic Impact of Tourism on Stratford Town 2017.

- 1.11 The predominantly rural nature of the District means that many households and activities are heavily reliant on private transport. The proportion of households with more than one car is significantly higher than that at county and national level. Conversely, the difficulty of operating viable bus services in a dispersed rural area means that getting to shops, services and jobs is largely dependent on having a car. Flexible community transport schemes help to alleviate the problem of access and isolation for people without one. This situation means that the rural market towns and similar centres in the District play an important role as a focus for local shops and services. These centres are generally closer to many smaller settlements than larger towns. It is important to bolster their commercial role, improve their appearance and make them more accessible by public transport.

### **Gypsies, Travellers and Travelling Showpeople in the district**

- 1.12 There is a long history of Gypsies, Travellers and Travelling Showpeople residing and travelling through the borough. In February 2019 there were 81 pitches within the district consisting of local authority managed pitches and authorised private pitches. There are two private sites containing rented pitches whilst the remaining private sites are small, family owned sites. There is a county council managed site consisting of 30 pitches which was last redeveloped in 2009. There is also one Travelling Showperson's yard located in Stratford-Upon-Avon which has 6 plots. Within the county, Gypsies and Travellers have traditionally travelled on a seasonal basis through agricultural areas to the south and west.

### **Definition Context**

- 1.13 It is essential to consider definitions relating to the Gypsy and Traveller population. According to Niner<sup>3</sup>, there are three broad groupings of Gypsies and Travellers in England: traditional English (Romany) Gypsies, traditional Irish Travellers, and New Travellers. There are smaller numbers of Welsh Gypsies and Scottish Travellers. Romany Gypsies were first recorded in Britain around the year 1500, having migrated across Europe from an initial point of origin in Northern India.
- 1.14 Gypsies and Irish Travellers have been recognised by the courts to be two distinct ethnic groups, so have the full protection of the Equality Act 2010. The courts made clear that travelling is not a defining characteristic of these groups, but only one among others. This is significant, because the majority of Britain's estimated 300,000 Gypsies and Travellers are thought to live in conventional housing, some by choice, and some because of the severe shortage of sites<sup>4</sup>.
- 1.15 In August 2015, the DCLG amended its definition of Gypsies and Travellers, as set out below:

---

<sup>3</sup> Pat Niner (2004), Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System, ODPM, February 2004 located at <http://www.communities.gov.uk/documents/housing/pdf/158004.pdf>.

<sup>4</sup> Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers - Report of a CRE inquiry in England and Wales*, (Summary), May 2006, pages 3-4.

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*In determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:*

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

1.16 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority. Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>5</sup>.

1.17 According to DCLG (August 2015) guidance on planning policy for traveller sites, the definition of Travelling Showpeople is:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.<sup>6</sup>*

1.18 Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAA's), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It recommends that Travelling Showpeople's own needs and requirements should be separately identified in the GTAA<sup>7</sup>. To ensure it is following DCLG guidance, this GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG 'Planning Policy for Traveller Sites' (August 2015) (see above).

---

<sup>5</sup> DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

<sup>6</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015.

<sup>7</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.

- 1.19 It is important to note that Gypsies and Travellers and Traveling Showpeople have separate accommodation need requirements. Different terminology is used to distinguish Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. As well as space for living quarters, due to work, Travelling Showpeople require additional space in order to store and maintain large equipment.

## Summary

- 1.20 Whilst the Housing and Planning Act 2016 removes the requirement for all local authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers, the August 2015 Planning Policy for Traveller Sites (PPTS) reiterates the need for local authorities to evidence the accommodation needs of Gypsies and Travellers and to determine the number, type and location of new provision. The PPTS amended the definition of Gypsies and Travellers for planning purposes.
- 1.21 The purpose of this assessment is to quantify the accommodation and related support needs of Gypsies and Travellers in the Stratford-on-Avon District Council area between 2019 and 2035. This is in terms of permanent pitches (and sites) and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. The results will be used to inform the allocation of resources and as an evidence base for policy development in housing and planning.
- 1.22 To achieve the study aims, the research drew on several data sources: a review of secondary information; consultation with organisations involved with Gypsy and Traveller and Travelling Showpeople issues, and extensive surveys of Gypsies and Travellers. These provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.
- 1.23 Stratford-on-Avon District is mainly rural in character with over 75% of residents residing outside the main town of Stratford-upon-Avon. There are about 250 communities of varying sizes spread across the predominately rural area of 979 square kilometres. It is one of the largest Districts in lowland England with a low population density, making delivery of, and access to, services a major issue for reside.
- 1.24 Most of the District to the north of Stratford-upon-Avon lies within the West Midlands Green Belt. The Cotswolds Area of Natural Beauty extends into the southern fringes of the District. In terms of strategic transport connections, the M40 and M42 both cross the District. The other strategic route is the A46 that crosses the District between Evesham and Warwick and forms the northern bypass to the town of Stratford-upon-Avon. The predominantly rural nature of the District means that many households and activities are heavily reliant on private transport.



## 2. Policy context

### Introduction

- 2.1 To assess the current policy context, existing documents have been examined to determine what reference is made to Gypsy and Traveller and Travelling Showpeople issues.
- 2.2 The intention is to highlight areas of effective practice in the District, and examine the extent to which authorities are currently addressing the issue. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation need and housing related support need among Gypsies and Traveller and Travelling Showpeople.

### National Policies

#### *DCLG Planning Policy for Traveller Sites (PPTS) (August 2015)*

- 2.3 In August 2015 the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Show People. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:
  - effectively engage with both settled and traveller communities
  - co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas
  - and use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions
- 2.4 There are some key differences between the March 2012 and August 2015 versions of the PPTS
- 2.5 One important amendment relates to the change in the definitions of Gypsies, Travellers, and Travelling Showpeople. The August 2015 PPTS changed the definition to exclude households who have permanently ceased to travel – in effect, for planning purposes, PPTS regards such households as members of the settled community. As such, their accommodation needs are not considered as part of Gypsy and Traveller accommodation assessments, and so this is the approach taken in this GTAA.

- 2.6 Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.7 One interpretation is that ‘a nomadic habit of life’ means travelling for an economic purpose. Previous case law e.g. *R v Shropshire CC ex p Bungay* (1990) and *Hearne v National Assembly for Wales* (1999) has been used to support this point. However, there is nothing within PPTS which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling. Also, such case law precedes the August 2015 definition change and it is believed that there has not yet been any caselaw in relation to the updated definition.
- 2.8 More recent Planning Inspectors’ reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a planning appeal decision regarding a site at Throcking, Hertfordshire, in 2016 concluded the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence “that he is currently a person of a nomadic habit of life”<sup>8</sup> for employment purposes (i.e. he did not meet the August 2015 PPTS definition).
- 2.9 In contrast, some other Planning Inspectors’ reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010<sup>9</sup>. *RRR Consultancy* is also aware of current and potentially forthcoming legal challenges to the August 2015 PPTS definition. For example, the Community Law Partnership is preparing a legal challenge to the definition on behalf of a Gypsy woman. It is therefore *possible* that applying a strict employment-based interpretation of the August 2015 definition for planning purposes could lead to difficulties, but it is also possible that the legal challenge to PPTS could fail and the employment-based interpretation become more settled.
- 2.10 In the absence of caselaw on the current (2015) PPTS definition, the key conclusion to draw on this matter is that there is no firm, settled understanding of the extent to which nomadism for employment-related purposes is determinative of the planning status of a self-identifying Gypsy and Traveller. As the differing appeal decisions show, the facts of each individual case are very important in reaching a conclusion.

---

<sup>8</sup> Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire, 6 December 2016.

<sup>9</sup> Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

- 2.11 Given the above, our approach is to undertake a methodology which provides first, a need figure based on ethnic identity; and second, a figure based on the PPTS (August 2015) definition. A third option was considered (i.e. a figure based on the accommodation needs only of families who travel for work), but due to the likelihood of this option underestimating accommodation need, the Council are not pursuing this approach within the GTAA.
- 2.12 Using these methods will 'future-proof' the Accommodation Needs Assessment and ensure that the revised definition is applied in both a fair and objective manner. As such, the accommodation needs of Gypsies and Travellers are able to be determined in respect of the current definition that is both robust and reliable and minimises possible future challenges. Different GTAAs reach differing conclusions on this matter and it is for the Local Authorities to decide individually which approach to take for planning purposes. It is recommended that this be kept under review in the light of evolving appeal decisions and caselaw.

*DCLG Review of housing needs for caravans and houseboats: draft guidance (March 2016)*<sup>10</sup>

- 2.13 In March 2016 DCLG published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances, for example:
- Caravan and houseboat dwelling households:
    - who have no authorised site anywhere on which to reside
    - whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation
    - who contain suppressed households who are unable to set up separate family units and
    - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
  - Bricks and mortar dwelling households:
    - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).
- 2.14 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Travellers, and Travelling Showpeople.

---

<sup>10</sup> See <https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance>

2.15 The DCLG draft guidance (2016) recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:

- their nomadic or semi-nomadic pattern of life
- their preference for caravan and houseboat-dwelling
- movement between bricks-and-mortar housing and caravans or houseboats
- their presence on unauthorised encampments or developments.

2.16 Also, it suggests that as mobility between areas may have implications for carrying out an assessment local authorities will need to consider:

- co-operating across boundaries both in carrying out assessments and delivering solutions
- the timing of the accommodation needs assessment
- different data sources

2.17 Finally, the DCLG draft guidance (2016) states that in relation to Travelling Showpeople account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.

### *Housing and Planning Act 2016*

2.18 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the District in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

### **Local Planning Policies**

#### *Stratford-on-Avon DC Core Strategy 2011-2031 Adopted July 2016*

2.19 Policy CS.21 of the Core Strategy outlines the criteria for implementing new Gypsy and Traveller sites. It identifies two preferred broad locations for Gypsy and Traveller provision including:

- Broad Location 1 – the ‘Avon Valley’ outside of the Green Belt
- Broad location 2 – the remainder of the District, but outside of the Cotswolds AONB

2.20 The Core Strategy emphasises that in accordance with NPPF policy, proposed new sites in the Green Belt will only be considered if the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Specific criteria for determining the location of new Gypsy and Traveller sites include:

1. The site is not located within the Green Belt, unless there are very special circumstances, or the Cotswolds Area of Outstanding Natural Beauty (AONB), unless it complies with Policy CS.11;
2. The site is not located within an area of designated historic or environmental importance and will not compromise the objectives of any national or local designation, including Special Landscape Areas;
3. If located in proximity to the Cotswolds AONB, the site will have a buffer of appropriate scale and landscaping to minimise any adverse visual impact upon the AONB;
4. The site should avoid areas prone to fluvial, pluvial or surface water flooding, and exclude areas with a 1 in 100 or greater annual probability of flooding;
5. The site will not be located on unstable or contaminated land that cannot be mitigated;
6. The site will have safe access to the highway and avoid significant impact on minor rural roads;
7. The site will be in a sustainable location in reasonable proximity to local services and facilities, including health and emergency services, making them accessible by modes of transport more sustainable than the private car;
8. The location of the site will not result in unacceptable environmental impacts on the amenity of future occupiers of the site;
9. The development and use of the site makes best use of previously developed, untidy or derelict land where available and suitable and will not have unacceptable adverse impacts on the landscape, biodiversity or the built environment;
10. The site will have a good residential environment and be of good quality layout and design incorporating appropriate landscaping, security, utilities and facilities, and be acceptable in terms of foul and surface water drainage and waste storage and disposal;
11. The site will not have an unacceptable adverse impact on neighbouring residential amenity, including noise from any commercial activities; and
12. Arrangements are put in place to ensure the proper management of the site to seek to ensure community cohesion between the settled and traveller communities<sup>11</sup>.

*Stratford-on-Avon DC – Intention to prepare a Local Plan, March 2014*

2.21 This document provided public notice of the Council's intention to prepare a Gypsy and Traveller Local Plan and consulted on what the plan ought to contain. The consultation also asked for suggestions for land potentially suitable for new Gypsy and Traveller sites in the District. According to the document, within the District, most Gypsies and Travellers do not

---

<sup>11</sup> Stratford-on-Avon DC Core Strategy 2011-2031 Adopted July 2016 pp.118-119.

travel extensively but occupy permanent sites. However, it acknowledges that there is an under-provision of authorised pitches for Gypsies and Travellers in the District. The document suggested that the Gypsy and Traveller Local Plan contains the following:

- Background information including the identified local need for additional Gypsy and Traveller pitches;
- Enough sites to meet the full identified need to 2031, taking account of pitches permitted since 2011. If this is not possible, then sufficient 'deliverable' sites should be allocated to meet the first five years after adoption with broad areas of search for the rest of the plan period;
- Guidance on site design and other detailed development management considerations; and
- Guidance on how the Council will implement and fund the plan and monitor its effectiveness.

#### *Stratford-on-Avon DC – Consultation on Implementation Options, September 2015*

2.22 In 2015 the Council consulted on a Gypsy and Traveller Local Plan - Implementation Options document which:

- Set out revised pitch requirements for the District
- Laid out proposed preferred search areas for new sites
- Suggested current temporary sites that could become permanent
- Safeguarded existing sites (those with permanent consent and no occupancy restriction)
- Commented on some known sites that the council was not proposing to allocate or safeguard

2.23 The consultation document suggests that new Gypsy and Traveller sites should be located a maximum distance of 4.8km from Stratford-upon-Avon and the main rural centres outside of the Green Belt, and 3km from local service villages that have both a GP and primary school and that are outside of the Green Belt. The 4.8km and 3km distances are linked to Government guidance on distances within which local authorities must provide free transport to school pupils and reflect what the Government considers to be reasonable walking distances to school, provided a safe route exists.

#### *Gypsy and Traveller Call for Sites 2018*

2.24 The Council ran a further 'call for sites' during March-April 2018 to seek suggestions from landowners and other interested parties for new Gypsy and Traveller sites across the District.

#### *Stratford-on-Avon Gypsy and Traveller Accommodation Assessments*

2.25 The Council has been proactive in determining the accommodation needs of Gypsies and Travellers since 2008. The District's Gypsy and Traveller accommodation needs were initially assessed by the 2008 South Housing Market Area of the West Midlands region. The GTAA

identified an additional need for 34 pitches over a 5-year period as well as a temporary stopping place consisting of 10 pitches to accommodate short-term needs. The Council then commissioned a new GTAA in 2011 which identified a need for 52 additional pitches over a 5-year period. In 2014 the Council commissioned a GTAA update in order to reflect changes to planning policy published by the DCLG in March 2012. The 2014 GTAA update identified a need for 41 additional pitches for the period 2014-2019, and a cumulative need for 71 additional pitches over the period 2014-2031. Finally, a 2016 GTAA Update was undertaken by Warwickshire County Council which identified a net need of 19 pitches over the period 2016-2026.

### **Duty to cooperate and cross-border issues**

- 2.26 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.
- 2.27 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.
- 2.28 As part of this assessment consultation in relation to Gypsies, Travellers and Travelling Showpeople was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in detail in Chapter 4.
- 2.29 Given the transient nature of Gypsies and Travellers it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. Also, the travelling patterns of Gypsies and Travellers transcend local authority boundaries. As such, the following section discusses the results of GTAAs recently undertaken by neighbouring and nearby local authorities specifically in relation to accommodation need and travelling patterns.

#### *Black Country and South Staffordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2016*

- 2.30 The 2016 GTAA was undertaken on behalf of the Black Country local authorities of Dudley MBC, Sandwell Council, Walsall Council and Wolverhampton City Council, and South Staffordshire Council. It was undertaken using analysis of secondary data provided by the District local authorities rather than primary surveys. The GTTSAA identified a need for 156 Gypsy and Traveller pitches and 63 Travelling Showpeople plots over the 20-year period 2016-2036. Stakeholders identified main travelling routes within the District as the A41,

M54/A5, and A454. The A41/A49 is particularly used by Gypsies and Travellers in Shropshire. The number of unauthorised caravans throughout the District recorded by the DCLG Traveller Caravan Count had increased steadily throughout the previous 2 years from a total of 23 in January 2014 to 69 in January 2016. In particular, the number of caravans recorded in Sandwell increased from 9 in July 2015 to 35 in January 2016.

*Rugby Borough Council Gypsy and Traveller Accommodation Assessment Study (GTAAS) 2017*

- 2.31 The GTAAS was undertaken using survey interviews with Gypsy and Traveller households residing in the District. Between May 2017 and July 2017, a total of 81 surveys were undertaken by *RRR Consultancy* with Gypsy and Traveller families residing on authorised permanent and transit sites and families residing on sites with temporary planning permission. The GTAAS identified a need for 76 additional pitches for the period 2017-2037 (including households who do not travel for work) or 52 additional pitches (excluding households who do not travel for work). There was a total of 96 unauthorised encampments over the period January 2015 to April 2017 equating to an average of 10 per quarter. Excluding 'outliers' i.e. unauthorised encampments of unusual length, the average length of encampments was 5 days. Over nine tenths of all unauthorised encampments in the previous 3 years occurred in Rugby town. On average, the number of unauthorised encampments within the borough had been steadily decreasing.

*Warwick District Council Gypsy and Traveller Accommodation Assessment (GTAA) 2012*

- 2.32 The GTAA was based in a sample of 43 Gypsy and Traveller households residing on sites and in bricks and mortar accommodation. The GTAA identified a need for an additional 31 Gypsy and Traveller pitches for the period 2012-2026. It also suggested the need for 12 transit pitches. The GTAA noted that there were 72 separate unauthorised encampments during 2009 – 2012, although some unauthorised encampments consisted of the same households travelling around the District. Most unauthorised encampments were transiting through the District. The GTAA supported the approach of creating a network of transit facilities across the wider region to accommodate short term accommodation requirements.

*Birmingham Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2014*

- 2.33 The GTTSAA identified a need for an additional 8 Gypsy and Traveller pitches for the period 2014-2031. Key travelling routes mentioned by stakeholders were the M6, A5, A34 and A449. In relation to unauthorised encampments, the GTTSAA indicates that there were significant spikes in the number of unauthorised encampments and the number of caravans during the summer of 2011, although this fell right back by the summer of 2013. However, the average number of unauthorised caravans per night for each of the three years 2011-2012 was low at below 2 caravans. The GTTSAA also states that it is likely that some unauthorised encampments could be due to the same caravans moving from location to location. The

GTTSAA notes that whilst there is an existing transit site in Birmingham at Tameside Drive, this was occupied on a permanent basis and was the subject of a lengthy legal dispute. There are no emergency stopping places. As such, the GTTSAA recommends that the Council provides a suitably located, publicly-provided transit site of between 10 and 15 pitches.

*Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) 2014*

- 2.34 The Worcestershire GTAA was undertaken in 2014 on behalf of the six Worcestershire local authorities of Bromsgrove District Council, Malvern Hills District Council, Redditch Borough Council, Worcester City Council, Wychavon District Council, and Wyre Forest District Council. It identified no additional accommodation need for the first 5-period 2014/15 to 2018/19, but a need of 146 pitches over the 6-20 year period 2019/20 to 2033/34. The GTAA recommended that the authorities identify temporary stopping places for not less than 8 pitches to accommodate transit need, with at least one facility in the north and south of the County. It also recommended that Malvern Hills, Wychavon and Worcester City liaise to provide a shared facility for dealing with future unauthorised encampments and to provide flexibility in meeting different levels of need at different times.

*Coventry Gypsy and Traveller Accommodation Assessment (GTAA) 2015*

- 2.35 The GTAA identified a need for 4Gypsy and Traveller pitches over the 5-year period 2014/15 to 2018/19. However, it states that if assumptions regarding households in bricks and mortar accommodation are excluded from analysis then the authorised pitch shortfall is -1 i.e. there was sufficient capacity at the present time. The GTAA identified a need for an additional 6 pitches for the 13-year period 2019/20 to 2031/32. The GTAA noted that Gypsy and Traveller households tend to move between Warwickshire and Coventry. In relation to transit provision, the GTAA recommended that the City Council identify temporary stopping or transit places for 6 pitches of sufficient size.

## Summary

- 2.36 DCLG Planning Policy for Traveller Sites (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the District in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 2.37 Policy CS.21 of the Stratford-on-Avon DC Core Strategy 2011-2031 outlines the criteria for implementing new Gypsy and Traveller sites including that proposed new sites in the Green Belt will only be considered if the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. It also identifies two preferred broad locations for Gypsy and Traveller provision including: the 'Avon

Valley' outside of the Green Belt; and the remainder of the District, but outside of the Cotswolds AONB.

- 2.38 The Council's 2015 'Consultation on Implementation Options' suggests that new Gypsy and Traveller sites should be located a maximum distance of 4.8km from Stratford-upon-Avon and the main rural centres outside of the Green Belt, and 3km from local service villages that have both a GP and primary school and that are outside of the Green Belt. Since 2008 the Council has been proactive in determining the accommodation needs of Gypsies and Travellers including a 2008 GTAA, a 2011 GTAA, a 2014 GTAA update, and a 2016 GTAA update.
- 2.39 Given the cross-boundary characteristic of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAAs produced by neighbouring local authorities. GTAAs recently undertaken by neighbouring local authorities suggest that there remains some Gypsy and Traveller accommodation need throughout the region. Key travelling routes include the M6, M54, A5, A4, A49, and A454.

## 3. Trends in the population levels

### Introduction

- 3.1 This section examines population levels in the GTAA District and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the MHCLG Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the MHCLG on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting need.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the rapidly fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of caravans and so Gypsies and Travellers living in bricks and mortar accommodation are excluded. It should also be noted that pitches / households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is valuable because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The MHCLG Count includes data concerning both Gypsies and Travellers sites<sup>12</sup>. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from January 2016 to July 2018.

### Population

- 3.6 The total Gypsy and Traveller population living in the UK is unknown, with estimates for England ranging from 90,000 and 120,000<sup>13</sup> (1994) to 300,000<sup>14</sup> (2006). There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers

---

<sup>12</sup> Data regarding Travelling Showpeople is published separately by the MHCLG as 'experimental statistics'.

<sup>13</sup> J. P. Liegeois, (1994) *Romas, Gypsies and Travellers* Strasbourg: Council of Europe. This is equivalent to 0.15% to 0.21% of the total population.

<sup>14</sup> Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers - Report of a CRE inquiry in England and Wales*, (Summary), May 2006, pages 3-4.

now living in bricks and mortar accommodation. Estimates produced for the MHCLG suggest that at least 50% of the overall Gypsy and Traveller population are now living in permanent housing.

- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the MHCLG. The July 2018 Count (the most recent figures available) indicated a total of 22,662 caravans. Applying an assumed three person per caravan<sup>15</sup> multiplier would give a population of almost 68,000.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing,<sup>16</sup> gives a total population of almost 136,000 for England. However, given the limitations of the data this figure can only be very approximate, and is likely to be a significant underestimate.
- 3.9 For the first time, the national census, undertaken in 2011, included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. The 2011 Census suggests there were 173 Gypsies and Travellers living in Stratford-on-Avon representing around 0.14% of the usual resident population.<sup>17</sup>

Table 3.1 Gypsy and Traveller Population			
	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Stratford-on-Avon	120,485	173	0.14%

Source: NOMIS 2019

- 3.10 It is also possible to determine the Gypsy and Traveller population within the District by tenure. Derived from 2011 Census data, Table 3.2 shows the tenure of 59 Gypsy and Traveller households. The most common tenure is social rented housing occupied by almost half (47%) of households, followed by just over a fifth (21%) who own the housing they occupy, and around a sixth (17%) who rent privately. This includes households residing both on sites and in bricks and mortar accommodation.

Table 3.2 Gypsy and Traveller Population by tenure								
	Social rented		Owned		Private rented		Total	
	No.	%	No.	%	No.	%	No.	%
Stratford-on-Avon	28	47%	21	36%	10	17%	59	100%

Source: NOMIS 2019

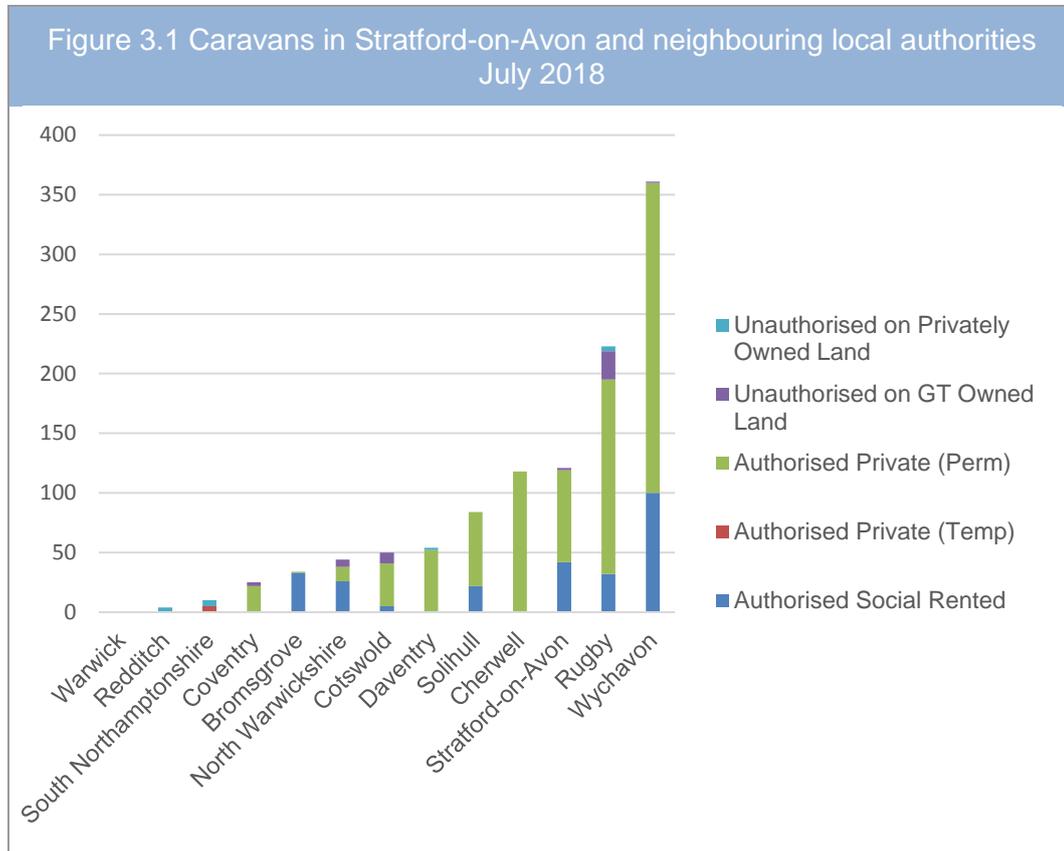
- 3.11 Figure 3.1 shows Stratford-on-Avon's Traveller July 2018 Caravan Count in the context of neighbouring local authorities. There is some variation in the number of caravans in each local authority with fewer than the average of 87 caravans recorded in 9 of the 13 local

<sup>15</sup> Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

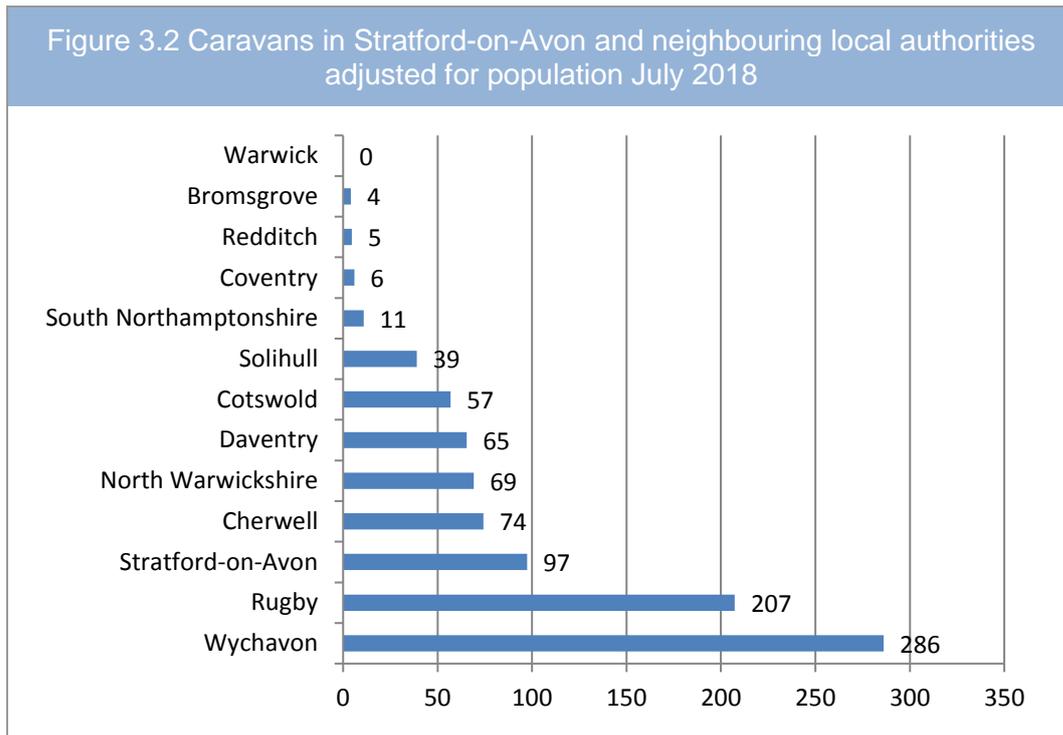
<sup>16</sup> Ibid.

<sup>17</sup> See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

authorities. The exceptions were Cherwell with 118 caravans recorded by the July 2018 count, Stratford-on-Avon with 121 caravans, Rugby with 223 caravans, and Wychavon with 361 caravans. There were 60 caravans located on unauthorised pitches in July 2018 of which 2 were located in Stratford-on-Avon.

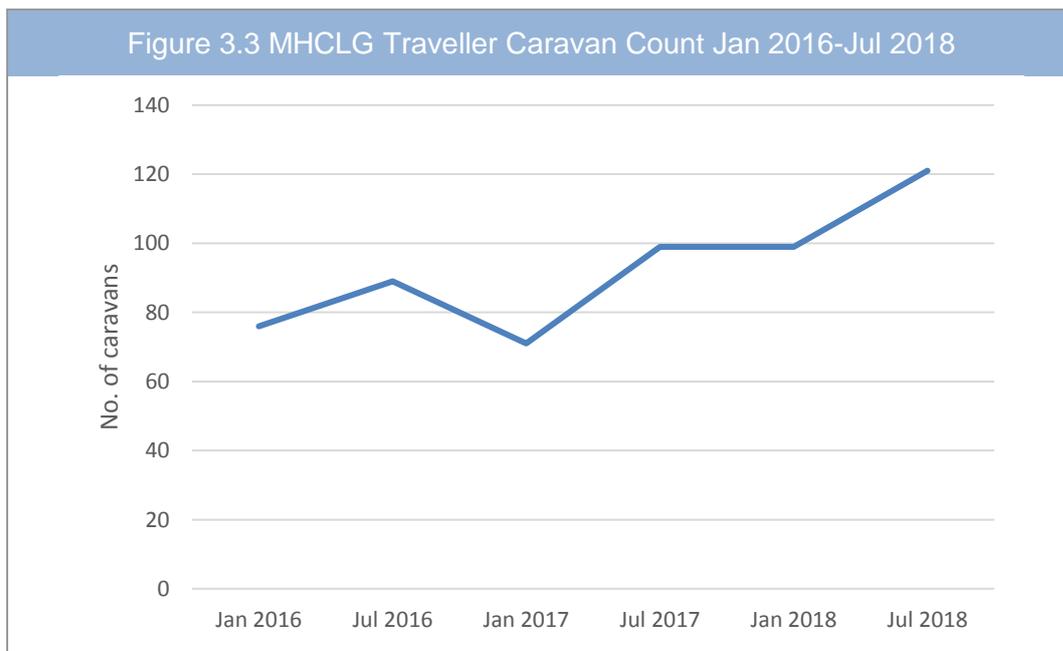


3.12 Figure 3.2 shows that when the population is taken into account the density of caravans varies. 9 of the 13 local authority areas are below the regional average of 71 caravans per 100,000 population. Cherwell (74 caravans per 100,000 population), Stratford-on-Avon (97), Rugby (207), and Wychavon (286) are above the average.



Source: MHCLG Traveller Caravan Count, November 2018

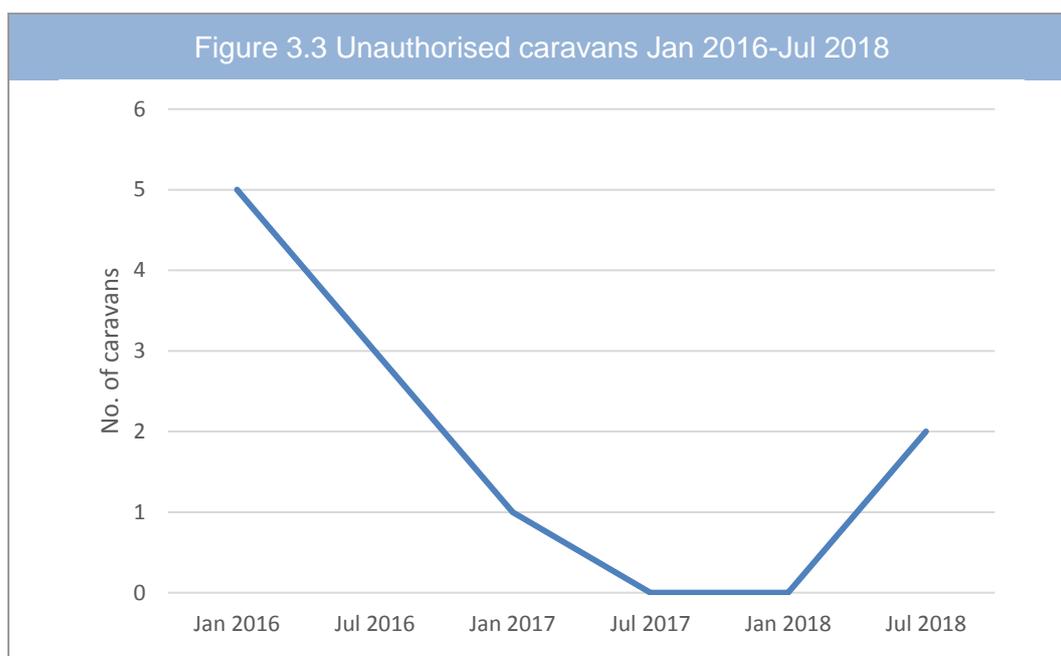
3.13 Figure 3.3 shows that the total number of caravans recorded in Stratford-on-Avon has increased steadily over the period January 2016 to July 2018. The MHCLG recorded 76 caravans in the District in January 2016 and 121 caravans in July 2018. The main difference is due to an increase in the number of caravans located on private authorised pitches from 29 in January 2016 to 77 in July 2018. During the same period the number of caravans recorded with temporary planning permission reduced from 11 to nil, whilst the number of caravans recorded on unauthorised pitches reduced from 5 to 2.



Source: MHCLG Traveller Caravan Count, November 2018

## Data on unauthorised encampments

3.14 MHCLG data on unauthorised encampments (i.e. caravans residing temporarily on 'sites' without planning permission) is of limited accuracy, although it may indicate general trends. Figure 3.4 shows that the number of caravans recorded on unauthorised pitches in the District decreased from 5 in January 2016 to nil in July 2017 and January 2018, before increasing slightly to 2 in July 2018.

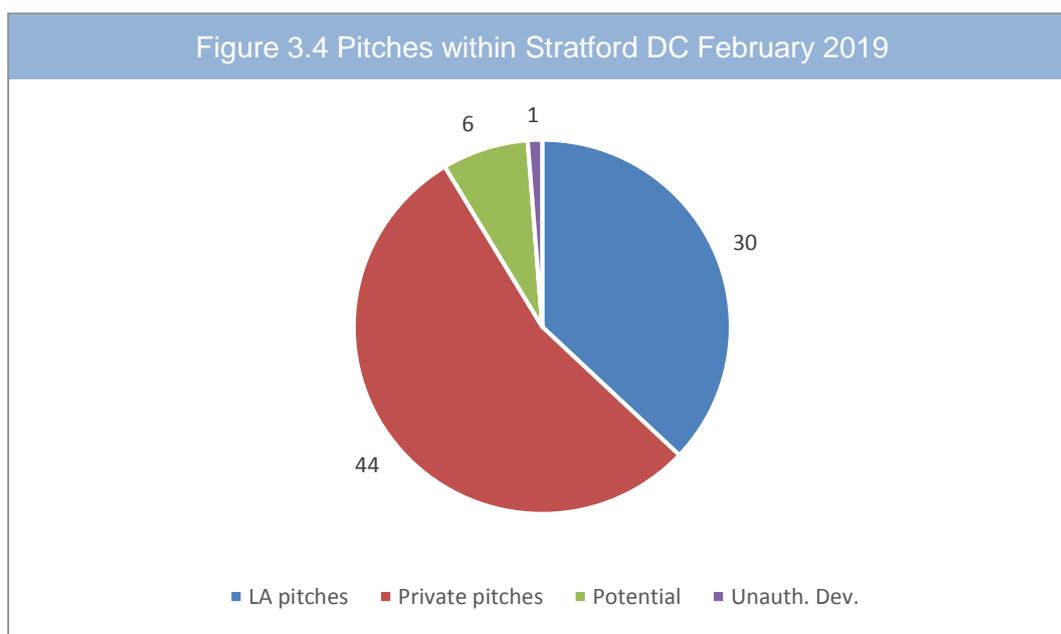


Source: MHCLG Traveller Caravan Count, November 2018

## Permanent residential pitches within the District

3.15 As Figure 3.4 shows, in February 2019 there were 81 pitches within the District consisting of 30 local authority managed pitches, 44 authorised private pitches, 6 potential pitches (i.e. pitches that are currently being developed), and 1 pitch located on an unauthorised development. There are two private sites containing rented pitches whilst the remaining private sites are small, family owned sites.

3.16 One site containing 6 pitches is currently being developed within the District. The pitches are recorded as 'potential' in the accommodation needs Table 5.6 in chapter 5. All 6 pitches have already been allocated to family members of the site owner. The family are currently residing on roadside locations within the District. As such, their accommodation needs are recorded as deriving from 'unauthorised encampments' in Table 5.6.



## Travelling Showpeople

- 3.17 Data from planning permissions is also available in the District showing provision for Travelling Showpeople. The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot.
- 3.18 There is one Travelling Showperson's yard located in Stratford-Upon-Avon which has 6 plots in use as winter quarters. It should consequently be borne in mind that the amount of land needed to live on is greater than for Gypsies and Travellers. For clarity, we refer to Travelling Showpeople 'plots' rather than 'pitches', and 'yards' rather than 'sites' to recognise the differences in design.

## Summary

- 3.19 The 2011 Census suggests there were 173 Gypsies and Travellers residing in Stratford-on-Avon District representing about 0.14% of the total population. The 2011 Census records a total of 59 Gypsy and Traveller households residing within Stratford-on-Avon District, almost half of which were residing in social rented housing. The MHCLG July 2018 Count shows the number there were 121 Gypsy and Traveller caravans located in the District. This figure is high when compared to an average of 93 caravans recorded by neighbouring local authorities. Similarly, when population size is considered Stratford-on-Avon (97 caravans per 100,000 population) is above the average for neighbouring local authorities (71 caravans per 100,000 population). The total number of caravans recorded in Stratford-on-Avon District has increased steadily from 76 in January 2016 to 121 in July 2018. MHCLG data has recorded few unauthorised encampments within the District over the same period (although the count is of limited accuracy). There is a total of 81 pitches recorded within the District. There is also one Travelling Showperson yard accommodating 6 plots located within the District.



## 4. Stakeholder consultation

### Introduction

- 4.1 Consultations with a range of stakeholders were conducted in January and February 2019 to provide in-depth qualitative information about the accommodation needs of Gypsies and Travellers. The aim of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the District. The consultation took the form of an online survey (completed by 40 stakeholders), a focus group and interviews. In recognition that Gypsy and Traveller issues transcend geographical boundaries and the need to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers from neighbouring authorities.
- 4.2 Key stakeholders involved in the consultation included elected members (including local district, parish and town councillors), housing, planning, and education officers from Stratford-on-Avon District Council, Warwickshire County Council, and neighbouring authorities, the Office of the Police and Crime Commissioner for Warwickshire (OPCCW), the Warwickshire Ethnic Minority and Traveller Achievement Service (WEMTAS), and representatives from The Traveller Movement, and the National Federation of Gypsy Liaison Officers.
- 4.3 Themes discussed through the consultation included: the need for additional accommodation and facilities; travelling patterns; the availability of land; accessing services; and work taking place to meet the needs of Gypsies and Travellers. This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised.

### Accommodation needs

- 4.4 Stakeholders commented on the main issues regarding the accommodation needs of Gypsies and Travellers and Travelling Showpeople in the District. It was noted that there is one local authority owned site, several privately rented or owned sites, and one Travelling Showpeople yard located in the District. Stakeholders believe that a lack of spaces on some sites mean that some families have to 'double up'. A key issue mentioned by stakeholders is the growth of family units which is leading to overcrowding and demands for more permanent sites. It was suggested that there is some overcrowding on existing sites due to concealed households. Also, it was acknowledged that overcrowding prevents younger family members from forming their own household and that a number of adult children residing on existing sites may need separate accommodation within the next 5 years.
- 4.5 The poor condition of some sites or those that are located too far away from schools or health facilities and shops may impact on where accommodation need arises. An example was provided of a site located at the top of a hill which can be difficult to access during winter months.

- 4.6 Some Gypsy and Traveller households prefer to be on the edge of communities and/or close to key transport routes. However, by way of an example from elsewhere, it was noted that there are several privately owned Gypsy and Traveller sites along the A5 which are situated close to settled communities. Several stakeholders commented on the need for improvements, and health and safety checks, to be undertaken on the local authority site. It was also noted that the local authority site is overcrowded. It is beginning to encroach on adjacent land and expanding it would lead to an unbalanced community. According to one stakeholder, there is a Gypsy and Traveller site on the Warwickshire/Oxfordshire border which is overcrowded with mobile homes. It was suggested that there is a need to locate any new accommodation away from the Pathlow and Wilmcote areas. Also, that new sites should have good access to local services which are able to absorb the additional demand without negatively impacting on them, and be located a sufficient distance away from permanent residents to minimise impact on local amenities. Similarly, it was suggested that new sites should be located on the edge of towns or larger settlements which are located in non-green belt areas with suitable amenities (preferably on brownfield sites not located in a flood risk area).
- 4.7 In relation to Gypsies and Travellers residing in bricks and mortar accommodation, it was suggested that many families reside in social rented housing throughout the county, especially in Warwick. Also, there are some Irish Travellers residing in bricks and mortar accommodation in Stratford. However, such families still want to travel. Gypsies and Travellers residing in bricks and mortar accommodation parking caravans on gardens sometimes led to conflict with the neighbours.

#### **Transit provision and travelling patterns**

- 4.8 Stakeholders suggested that a lack of suitable permanent and transit sites within the county can lead to unauthorised encampments. It was estimated that around 130 unauthorised encampments take place each year throughout the county. However, the number of unauthorised encampments taking place in Stratford-on-Avon was considered by stakeholders to be relatively low. According to one stakeholder, unauthorised encampments tend to mainly occur in Warwick District, Rugby District and Nuneaton. Of the 40 stakeholders who had responded to the online survey, 13 stated that they had experienced an increase in unauthorised encampments during the last few years, 4 stated that they had experienced a decrease, 4 stated that there had been no change, and 19 did not know or did not respond.
- 4.9 It was suggested that Gypsies and Travellers travel on a seasonal basis through agricultural areas to the south and west of the county. Also, that some New Travellers find unobtrusive locations adjacent to main roads in order to sell crafts, mostly wood carvings, and usually leave temporary sites in good order. It was noted that Travelling Showpeople's movements are sometimes dictated by local events e.g. Mop Fairs.
- 4.10 There is a 'circuit' of families on unauthorised encampments who travel throughout the county. Some unauthorised encampments within the county occur due to a small number of

Irish Traveller families. It was suggested by some stakeholders that the PPTS 2015 definition of Gypsy and Traveller may encourage households to travel in order to prove their ethnic identity. Alternatively, it was suggested by some stakeholders that PPTS 2015 has had no impact on travelling patterns within the county. It was noted that Warwickshire County Council has developed a protocol for dealing with unauthorised encampments which has been adopted by the constituent local authorities.

- 4.11 It was suggested that it is important to consider the difference between small and large unauthorised encampments. Most small unauthorised encampments that occur within the county do not impact much on local communities. An example was given of a small group of French Gypsies who had set up camp in the county in 2018 without any objections from the local community. One reason may have been that they were using old-fashioned style wagons rather than modern vehicles.
- 4.12 However, it was acknowledged by stakeholders that Gypsies and Travellers can sometimes leave unauthorised encampments in a very poor condition. It was suggested that some unauthorised encampments lead to significant fly-tipping, contamination of land, and damage to community resources.
- 4.13 Larger unauthorised encampments consisting of 50 or more vehicles may occur due to events such as Kenilworth Fair which attracts large numbers of Gypsies and Travellers (although the fair will no longer take place at the Thickthorn site in Warwick District). There may also be issues with unauthorised encampments taking place on county borders as it can be difficult to determine which local agency may need to deal with them.
- 4.14 S61 police powers mean that households on unauthorised encampments should not return to the same location within 3 months. It was noted that the Warwickshire Police Gypsy and Traveller Liaison Officer has a good relationship with the Gypsy and Traveller community. However, it was also suggested that the police do not always apply a consistent approach to dealing with unauthorised encampments throughout the county.
- 4.15 In recent years there had been a shift in unauthorised encampments being perceived as a criminal issue rather than a civil issue. Some neighbouring authorities such as Rugby District Council have implemented an injunction policy against unauthorised encampments. This means that individuals or groups who set up an unauthorised encampment of council land can be immediately arrested for contempt of court with sentences ranging from a fine to imprisonment.
- 4.16 The injunction approach means that short-term unauthorised encampments may still occur in Rugby, but there are no longer-term encampments. Some Gypsy and Traveller households are challenging injunctions in court, and as it usually takes between 3 to 4 weeks for a court to make a decision, the encampment has usually moved on. It was suggested that injunctions should be an option of "last resort". Also, that the use of injunctions by Rugby District Council

may lead to the displacement of unauthorised encampments to neighbouring authorities as families are moved on.

- 4.17 An alternative to injunctions suggested by stakeholders is a negotiated stopping policy which involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. It was suggested that a shift in policy from removing Gypsy and Traveller households located on unauthorised encampments to agencies implementing a 'code of conduct' would be more cost-effective and save money in the longer term.

### **Barriers to provision**

- 4.18 The main barriers to delivering new sites were regarded as: the limited availability of appropriate sites; the financial viability of new sites and difficulties in financing new provision; competing and conflicting priority pressures for available sites. Another key barrier mentioned by stakeholders was the extent of green belt land within the District which constrains where potential sites can be located.
- 4.19 It was acknowledged by stakeholders that the proposed location of new sites is likely to be a key issue. A recent call for sites by Stratford-on-Avon Council had led to only one potential site being put forward. An example was provided of public opposition to a new transit site with 12 pitches located in Oldbury. The site had recently been vandalised.
- 4.20 According to some stakeholders, negative attitudes and a lack of understanding of the Gypsy and Traveller community constitute key barriers to new sites. There was concern that public opposition to new sites in areas with already relatively high Gypsy and Traveller population were most likely to attract opposition from the settled community.
- 4.21 It was suggested that holding information sessions with elected members and service providers could be used to help inform them of the key issues facing Gypsies and Travellers within the county. These could also be used to highlight the aims and objectives of the Gypsies and Travellers Accommodation Assessment (GTAA) and aid in the work of agencies when working with Gypsies and Travellers.
- 4.22 It was noted that, after being assessed in accordance with planning policy and guidance, some applications for new Gypsy and Traveller sites are refused planning permission. However, some applications which are initially refused planning permission are subsequently overturned on appeal. Families already established in the community were less likely to face public opposition. It was suggested that Gypsy and Traveller families may not be familiar with planning regulations and may need help in applying for planning permission.
- 4.23 One key issue discussed by stakeholders was the availability of land for new sites. The stakeholders know of few Gypsy and Traveller families either locally or in neighbouring boroughs that had been able to both buy land and get planning permission to develop it as a

permanent site. It was acknowledged that land within Stratford-on-Avon was too expensive for families to buy. One stakeholder suggested that any new Travelling Showperson yard should be located on a site which is suitable for expansion.

### **Relationship between Gypsies, Travellers and the settled community**

- 4.24 Negative media articles can impact on the settled community's perception of Gypsies and Travellers. The negative rhetoric found on social media is also problematic. Stakeholders stated that there are too few positive media articles e.g. when unauthorised encampments leave sites in a good condition. It was noted that there are many positive articles about the Gypsy and Traveller culture and lifestyle in the Traveller Times, although these do not get much media attention.
- 4.25 Despite negative stereotypes of Gypsies and Travellers, many households are involved with local communities. An example was provided of some Gypsy and Traveller households joining a local community group which had helped to improve relations with the local community. Other positive examples cited were the role that Gypsies and Travellers played in supporting a local church and another of the community supporting a local foodbank. It was suggested that everyone would benefit from being better educated about the Gypsy and Traveller culture and lifestyle and that much opposition to sites derives from misunderstanding.
- 4.26 Smaller sites were mentioned by stakeholders as being less likely to face opposition by the settled community. However, it was acknowledged that unauthorised encampments left in poor condition tend to raise tensions with local communities. It was suggested that whilst the settled community's main view of Gypsies Travellers derived from experience of unauthorised encampments, barriers and misunderstanding between the communities will continue. Also, members of the settled community sometimes perceive that planning rules and regulations are applied differently to the Gypsy and Traveller community.
- 4.27 As such, there is a need to challenge prejudice. This could include encouraging better integration of Gypsy and Traveller children in local schools and more socialising between parents from both groups. Similarly, it was suggested that there needs to be a sustained campaign to improve the settled community's understanding of Gypsy and Traveller issues whilst not tolerating unlawful or anti-social behaviour. It was also suggested that there needs to be more public consultation in relation to considering new Gypsy and Traveller sites.

### **Access to Health/Education/Services**

- 4.28 Stakeholders were asked if they were aware of any particular health, education or any other service issue experienced by the Gypsies and Travellers and Travelling Showpeople currently based in their local area. Some stakeholders were aware of health and education needs of specific families. Stakeholders suggested that the consideration of planning applications for new sites should involve assessing access to health and education facilities.

- 4.29 Generally, it was acknowledged that Gypsies and Travellers have a poor standard of health compared to the settled population leading to greater adult and child mortality. That they are not always able to access local health facilities can often put additional pressure on A&E departments. The poor condition of some sites can impact on health issues. Stakeholders noted that access to GPs can be difficult with some Gypsy and Traveller families being told that they reside in the 'wrong' postcode area in order to access local health facilities. As such, Gypsy and Traveller families may visit certain GPs with whom they have developed a good relationship. A lack of transport can hinder Gypsy and Traveller families' access to health or education facilities.
- 4.30 According to stakeholders, the take-up amongst Gypsy and Traveller families within the county at primary school level is "almost 100%". Some families also employ home schooling whilst some Gypsy and Traveller children within the county are attending college or university (although the local media are unlikely to cover educational success within the community). It was suggested that the cultural tradition of travelling combined with a lack of suitable sites can make it more difficult to educate children. Also, limited school places mean it can be difficult for schools to enrol all children from families containing several siblings.
- 4.31 Some stakeholders stated that it is essential for new sites to have play areas for children. It was suggested that Gypsy and Traveller sites would now be designed differently i.e. to provide more space for both accommodation and recreation. Some sites are located too close to rail lines or rubbish dumps leading to health issues. Also, a lack of space for parking on some sites can cause issues with vehicles turning around.

### **Cooperation and joint working**

- 4.32 According to some stakeholders, despite areas of good practice there is still need for better collaborative and coordinated working. Local authorities in Warwickshire need to communicate better with agencies and the Gypsy and Traveller community, including those residing on sites. It was suggested that there could be better communication – especially between the metropolitan and Warwickshire local authorities. It was noted that there used to be a joint group dealing with Gypsy and Traveller issues chaired by the county council and attended by housing, planning, education, health staff, and the police, although the group no longer meets. According to one stakeholder, Gypsy and Traveller representatives need to be more accessible to parish councils in order to discuss any issues.
- 4.33 The joint Warwickshire protocol on unauthorised encampments was cited as a good example of joint working between the county council and local authorities. Also, the positive work of the Office of the Police and Crime Commissioner for Warwickshire (OPCCW) in relation to Gypsy and Traveller issues was acknowledged. The OPCCW has employed a Gypsy and Traveller Liaison Officer whose skills and knowledge were described as "superb" and whom has played an essential role in successfully negotiating with Gypsy and Traveller families residing on unauthorised encampments. The OPCCW has hosted partnership meetings and a Gypsy and Traveller summit and is planning to do again in Spring 2019. It was stated that

that the coordination and expertise of agencies within the county whom deal with Gypsy and Traveller issues is good, “but there is still much to do”.

## Summary

- 4.34 The consultation with key stakeholders offered important insights into the main issues within the District. It was generally acknowledged that there is a lack of permanent and transit accommodation provision throughout the county. A lack of spaces on some sites mean that families have to ‘double up’. Gypsy and Traveller households prefer to be on the edge of communities and/or close to key transport routes. New sites should be accessible to health, education and other facilities. However, they should be located in areas which have the capacity to absorb additional demands for services.
- 4.35 A lack of suitable permanent and transit sites within the county can lead to unauthorised encampments. It was estimated that around 130 unauthorised encampments take place each year throughout the county. However, the number of unauthorised encampments taking place in Stratford-on-Avon was considered by stakeholders to be relatively low. A majority of respondents stated that their local areas had experienced increases in unauthorised encampments during the last few years. There is a ‘circuit’ of families on unauthorised encampments who travel throughout the county. Most small unauthorised encampments that occur within the county do not impact much on local communities. Larger unauthorised encampments consisting of 50 or more vehicles may occur due to events such as Kenilworth Fair which attracts large numbers of Gypsies and Travellers.
- 4.36 The main barriers to delivering new sites were regarded as: the limited availability of appropriate sites; the financial viability of new sites and difficulties in financing new provision; competing and conflicting priority pressures for available sites. Another key barrier mentioned by stakeholders was the extent of green belt land within the District which constrains where potential sites can be located. Negative attitudes and a lack of understanding of the Gypsy and Traveller community constitute key barriers to new sites. It was suggested that holding information sessions with elected members and service providers could be used to help inform them of the key issues facing Gypsies and Travellers within the county.
- 4.37 It was acknowledged that Gypsies and Travellers have a poor standard of health compared to the settled population leading to greater adult and child mortality. Access to GPs can be difficult meaning that some Gypsy and Traveller families may visit certain GPs with whom they have developed a good relationship. A lack of transport can hinder Gypsy and Traveller families’ access to health or education facilities. The attendance rates of Gypsy and Traveller children attending primary school is very high, and some local Gypsy and Traveller children attend college or university. It was suggested that planning applications for new sites should consider access to health and education facilities.

4.38 Despite areas of good practice there is still need for better collaborative and coordinated working between agencies within the county. The joint Warwickshire protocol on unauthorised encampments was cited as a good example of joint working between the county council and local authorities. Also, the positive work of the Office of the Police and Crime Commissioner for Warwickshire (OPCCW) in relation to Gypsy and Traveller issues was acknowledged.

## 5. Gypsies and Travellers residing on sites

### Introduction

- 5.1 This chapter provides a snapshot of the supply of existing pitches and an analysis of need for current and future pitches across the borough. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families. It is based on surveys undertaken with 78 households<sup>18</sup> including 68 out of 74 residing on permanent pitches (a 92% response rate), 7 households residing on unauthorised encampments during the survey period), and 1 survey with a household residing on a tolerated unauthorised development.
- 5.2 The number and location of pitches were determined using local authority data. Households were consulted on key issues regarding accommodation needs. The surveys were undertaken in February 2019. The combination of local authority data, site visits and consultation with survey households helped to clarify the status of pitches i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues.
- 5.3 All efforts that were made to access households residing in bricks and mortar accommodation. However, it was not possible to identify a sufficient sample to determine the accommodation needs of the whole population residing in bricks and mortar accommodation. The methods used in attempting to contact households residing in bricks and mortar accommodation included:
- Asking households residing on sites if they were aware of any relatives or friends residing in bricks and mortar accommodation;
  - Contacting key stakeholders to request help to access Gypsies and Travellers living in bricks and mortar; and
  - Seeking information about the location of households residing in bricks and mortar accommodation through the stakeholder interviews

### Population Characteristics

- 5.4 The survey recorded 357 people residing in 83 households<sup>19</sup>. 68 (82%) of the 83 households described themselves as Romany Gypsies, 14 (17%) as Irish Travellers, 1 (1%) as Welsh Travellers (in accordance with ethnic identity and given full protection under the Equality Act

---

<sup>18</sup> The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household although it acknowledges that this may also include e.g. extended family members or hidden households.

<sup>19</sup> Please note that the responses of the 70 households surveyed on permanent authorised pitches have been weighted to reflect the characteristics of the total population of 74 households.

2010). Interestingly, this compares with figures derived from the 2011 Census which suggests that there were 173 Gypsies and Travellers living in the District<sup>20</sup>. However, whilst the Census figures are likely to reflect a larger proportion of Gypsies and Travellers living in bricks and mortar accommodation, they may not record all those residing on sites. Unusually, the average size of families residing on the survey sites is 2.15 people compared to the 2011 UK average of 2.4 people per household (Gypsy and Traveller households tend to be larger than the settled community).

- 5.5 The majority of households on each of the 10 sites were related to one another on their respective site. Most households had lived on their respective site since it was first developed and in some cases were born on the site. There are three generations of the same family residing on some of the sites, in one case there are four generations.
- 5.6 Household size on each pitch varied between 1 person and 8 persons. 5 (7%) households were of single occupancy, 16 (18%) households consisted of two people, 3 (3%) households consisted of 3 people, 18 (22%) consisted of 4 people, 20 (26%) consisted of 5 people, and 21 (24%) of households consisted of 6 or more people. In relation to age, about half (50%) of household members are aged between 20 and 70 years. However, over a third (45%) of household members are aged 19 years and under, and a small proportion (5%) are aged 71 years or more.

Table 5.1 Number of people in household		
	Number	Percentage
1 person	4	6%
2 people	16	19%
3 people	3	3%
4 people	18	22%
5 people	20	26%
6 people	12	14%
7 people	5	6%
8 people	4	4%
Total	82	100%

Source: GTAA 2019

<sup>20</sup> See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

Table 5.2 Age of household members		
	Number	Percentage
0-19 years	161	45%
20-40 years	71	20%
41-60 years	84	24%
61-70 years	22	6%
71+ years	18	5%
Total	356	100%

Source: GTAA 2019

### Residency characteristics

- 5.7 Similar proportions of surveyed Gypsy and Traveller households rent pitches from the local authority (36%) or rent privately (34%). Around a fifth (19%) of surveyed households owns the pitch they occupy, whilst smaller proportions were located on unauthorised encampments (10%), or an unauthorised development (1%).

Table 5.3 Tenure		
	Number	Percentage
Rent from an LA/RSL	30	36%
Private Rent	28	34%
Own	16	19%
Unauthorised encampment	7	10%
Unauthorised development	1	1%
Total	82	100%

Source: GTAA 2019

- 5.8 Reflecting longevity of tenure, most of the households had lived on their respective pitches for more than 5 years. In some cases some residents were born on their respective site. Most households residing on the local authority site had lived since the site was first developed. 10 households had resided on current site for less than 5 years.
- 5.9 The commitment of families to remaining on existing sites is reflected in the fact that all wanted to stay living together on their respective site and almost all stated that they did not intend to move in the future. Only 2 respondents (both residing on the local authority site) stated that they were considering to move due to concerns about conditions and lack of space on the site.
- 5.10 In terms of spatial provision, all households stated that they had space for a large trailer (100%), drying space for clothes (100%), and a lockage shed (100%). However, residents on the local authority site stated that they did not all have space for both a tourer and a large trailer. Some residents commented on how having to choose between a static caravan which provides the living space and amenities they need, and a tourer style caravan which would

enable them to travel. Those on private sites had the space, but in some cases also had to choose, because of planning restrictions (number of caravans allowed).

### Satisfaction

- 5.11 In terms of site conditions, amenities and the location residents were generally satisfied. All households residing on family sites were satisfied with sites. Some households residing on privately owned sites were keen to make further improvement to the sites, but were limited as to what they could do due to financial restraints and planning constraints.
- 5.12 Households residing on the local authority site commented on the advantages of living close to family and friends, but were concerned about the condition of the utility blocks, lack of space on pitches, and the difficulty in getting repairs and maintenance undertaken.
- 5.13 Irrespective of whether residing on local authority or private sites, almost all households stated that they felt safe due to the mutual support of neighbours, families and friends. Surveyed households residing on unauthorised encampments stated that not having a permanent site led them to feel less safe.
- 5.14 Surveyed households residing on both local authority and private sites were concerned about the high cost of electricity and difficulties in obtaining insurance. Households stated that once insurance companies are aware that they reside on Gypsy and Traveller sites, they either refuse to insure the household or increase the price of premiums.

### Services and health

- 5.15 All surveyed households stated that they had experienced discrimination due to their cultural identity. They also stated that they had considered it necessary, on occasion, to hide their ethnic identity in order to access services. Some stated that it was 'part of life for us'. However, few households stating that they had experienced discrimination reported it to the relevant authorities. The main reasons for not reporting it included wanting to ignore it or believing that reporting incidences to authorities would be ineffective.

Table 5.4 Registered with a GP		
	Number	Percentage
Yes	82	100%
No	0	0%
Total	82	100%

Source: GTAA 2019

- 5.16 In relation to accessing health services, all surveyed households were registered with a local doctor. Health issues reported included: problems due to old age, mental health issues, long-term illness, high blood pressure, asthma and chest complaints, and physical disability.

Compared with the settled community, the health status of Gypsies and Travellers tends to be poorer than the general population<sup>21</sup>.

### Education and employment

5.17 Reflecting the large number of young people residing in surveyed households, over half (60%) contained school-age children. Education was regarded by households as important. Some respondents commented on how it was important for children and grandchildren to receive an education as they did not have the same opportunity. Some families with pre-school children recognised the importance of early education and planned to send children to a nursery once old enough. In relation to children of school age, all primary aged children were receiving school education.

Table 5.5 School age children in family		
	Number	Percentage
Yes	51	60%
No	31	40%
Total	82	100%

Source: GTAA 2019

5.18 Surveyed households commented on how traditional employment opportunities for Gypsies and Travellers are now less available and this is why education is becoming more important. Although Gypsy and Traveller children have not traditionally done so, more families are ensuring that children gain qualifications either by attending secondary school or college or undertaking home tutoring. Some families spoke about how well their children were doing in terms of education and how well their grown-up children were doing in term of careers.

5.19 Employment status varied, including the majority of households with the main earner being self-employed, followed by housewives and retired household members. Some of those retired were still working (including self-employed in order to financially manage). Other careers included building and construction worker, and health care.

### Travelling

5.20 This GTAA provides two needs figures: first, a need figure based on ethnic identity; and second, a figure based on the PPTS (August 2015) definition.

5.21 For planning purposes, the revised PPTS (August 2015) definition only includes the accommodation needs of families who have not permanently ceased to travel. Few surveyed

<sup>21</sup> Cemlyn, Sarah, Greenfields, Margaret, Burnett, Sally, Matthews, Zoe and Whitwell, Chris (2009) *Inequalities Experience by Gypsy and Traveller Communities: A Review*, Equality and Human Rights Commission, London.

households stated that they have permanently ceased travelling. However, they stated that, reflecting cultural identity, they still feel a desire to travel even if they had not done so for many years. Households who had stopped travelling did so due to health issues, old age or being unable to travel.

### **Accommodation need**

- 5.22 All surveyed households stated that there is a need for more permanent sites in the District, and transit provision for households who visit or travel through the area. They spoke about being aware of Gypsies and Travellers residing in bricks and mortar accommodation in the District who are in need of pitches. They stated that such households are only residing in housing due to a lack of permanent pitch provision. Some surveyed households commented on how older children often have to stay with families longer due to lack of available pitches and the high cost of pitches or alternative accommodation.
- 5.23 Households stated that whilst there is need for additional pitch provision in the local area, not all sites have the capacity to expand, particularly the two private rental sites and the local authority site. However, some privately owned family sites have capacity to expand to meet the accommodation needs of family members.
- 5.24 From consultation with households it was determined that small family sites are ideal. However, respondents stated that there needs to be sufficient space on sites to enable family and friends to visit. They also stated that negotiated stopping agreements may be preferable to permanent transit sites. This would involve the police and local authorities developing a formal agreement with households residing on unauthorised encampments as to where and how long they could stay. Two issues mentioned by families were difficulties in obtaining planning permission for new sites and preconceptions by the settled community about such applications. They spoke about how they feel safer on smaller sites which are also easier to manage and maintain. They commented on how smaller sites tend to be more accepted by the local settled community and leads to better integration.
- 5.25 A third of the households had at some time resided in bricks and mortar accommodation, but all stated that they left as they were unable to cope. The households residing on permanent sites enjoy living together as a community, know one another well, and are mutually supportive. They stated that this type of support is not possible for Gypsies and Travellers who reside in housing.
- 5.26 The survey determined the number of households contain young people aged 18 or over who may require separate accommodation within the next 5 years. This helps to determine the extent of future accommodation needs deriving from existing households. There were 20 future households in need of a pitch within the next 5 years and 9 households containing 'hidden' households in the form of adult children requiring a separate pitch (see Step 12 in Table 5.6).

**Requirement for residential pitches 2019-2024<sup>22</sup>**

- 5.27 The need for residential pitches in Stratford-on-Avon is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.6 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. It is important to note that the figures shown in Table 5.6 includes all need as of 2019, including any which may have been identified by previous GTAA's but remained unfulfilled by April 2019.
- 5.28 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides three accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2015 ('PPTS' column).

Table 5.6 Estimate of the need for permanent residential site pitches 2019-2024

	<b>Ethnic</b>	<b>PPTS</b>
1) Current occupied permanent residential site pitches	74	74
<i>Current residential supply</i>		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality 2019-2024	2	2
4) Net number of family units on sites expected to leave the District in next 5 years	0	0
5) Number of family units on sites expected to move into housing in next 5 years	1	1
6) Residential pitches planned to be built or to be brought back into use 2019-2024	6	6
7) Less pitches with temporary planning permission	0	0
<b>Total Supply</b>	<b>9</b>	<b>9</b>
<i>Current residential need: Pitches</i>		
8) Family units (on pitches) seeking residential pitches in the area, 2019-2024, excluding those counted as moving due to overcrowding in step 11	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0
10) Family units on unauthorised encampments requiring residential pitches in the area	7	7
11) Family units on unauthorised developments requiring residential pitches in the area	1	1
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing an emerging family unit in step 8	10	7
13) Net new family units expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing family units on sites	20	17
<b>Total Need</b>	<b>38</b>	<b>32</b>
<i>Current residential need: Housing</i>		
15) Family units in housing but with a psychological aversion to housed accommodation	7	5
<b>Total Need</b>	<b>45</b>	<b>37</b>
<i>Balance of Need and Supply</i>		
<b>Total Additional Pitch Requirement</b>	<b>36</b>	<b>28</b>
<b>Annualised Additional Pitch Requirement</b>	<b>8</b>	<b>6</b>

Source: GTAA 2019

<sup>22</sup> Please note that due to rounding column totals may differ slightly from row totals

### **Requirement for residential pitches 2019-2024: steps of the calculation**

5.29 The calculations depend on base information derived from the GTAA using data corroborated by local authorities in the District. The key variables used to inform the calculations include:

- The number of Gypsies and Travellers housed in bricks and mortar accommodation
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches

5.30 The remainder of this chapter describes both the process and results of the Gypsy and Traveller needs calculations.

### **Supply of pitches 2019-2024**

5.31 Supply (steps 1 to 7) steps are the same irrespective of the definition of accommodation need used.

#### ***Step 1: Current occupied permanent site pitches***

5.32 Based on information provided by the Council and corroborated by information from site surveys. There are currently 74 occupied authorised Gypsy and Traveller pitches in Stratford-on-Avon.

#### ***Step 2: Number of unused residential pitches available***

5.33 According to the survey data there are currently 0 vacant pitches.

#### ***Step 3: Number of existing pitches expected to become vacant 2019-2024***

5.34 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.<sup>23</sup>

---

<sup>23</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987. NB: For Travelling Showpeople, the standard mortality rate is used.

**Step 4: Number of family units in site accommodation expressing a desire to leave the District**

5.35 This was determined by survey data. It was assumed, given that development of sites is likely to occur in the areas surrounding the District as well as in the planning area itself (which in the case of this GTAA is the same geographical area), that those currently living on sites expecting to leave the area permanently in the next five years – out of choice (step 4) or due to overcrowding (step 12) – would generally be able to do so. Given the low level of interest of surveyed households leaving the District, this resulted in the supply of 0 pitches.

**Step 5: Number of family units in site accommodation expressing a desire to live in housing**

5.36 This was determined by survey data. It was assumed that all those currently living on sites planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. A supply of 1 pitch in the District is expected from this source, excluding those moving out of the District, since these are already counted in step 4.

**Step 6: Residential pitches planned to be built or brought back into use, 2019-2024**

5.37 This is determined by local authority data and from an assessment of sites during visits. There are 6 pitches in the District that are expected to be built or brought back into use in the District during the period 2019-2024. These pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches include those which have been partly developed or which were previously occupied but are now vacant and in need of redevelopment.

5.38 All 6 potential pitches have already been allocated households and, as such, are not available for other Gypsy and Traveller families to occupy. The households who will occupy the pitches (including the site owner) are currently residing on unauthorised encampments. The accommodation needs of the households are considered in step 10 of the accommodation needs table.

**Step 7: Pitches with temporary planning permission**

5.39 This is determined by local authority data. It is assumed families living on pitches whose planning permission expires within the period 2019-2024 will still require accommodation within the District. There are currently 0 pitches with temporary planning permission located in the District.

**Need for pitches 2019-2024**

5.40 This needs assessment provides three accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2015 ('PPTS' column).

**Step 8: Family units on pitches seeking residential pitches in the District 2019-2024**

- 5.41 This was determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.
- 5.42 This category of need overlaps with those moving due to overcrowding, counted in step 11, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need of 0 pitches in the District.

**Step 9: Family units on transit pitches seeking residential pitches in the District 2019-2024**

- 5.43 This was determined by survey data. These family units reported that they required permanent pitches within the District in the next five years. This generates a total need of 0 pitches as there is no transit site in the District.

**Step 10: Family units on unauthorised encampments seeking residential pitches in the area**

- 5.44 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families living on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the District. Please note that only Gypsies and Travellers requiring permanent accommodation within the District have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 8 households residing on unauthorised encampments across the authority interviewed during the survey period, resulting in 7 of them with accommodation need.

**Step 11: Family units on unauthorised developments seeking residential pitches in the area**

- 5.45 This was determined by survey data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. There is a need of 1 pitch deriving from unauthorised developments in the District, which is also tolerated by the local authority.

**Step 12: Family units on overcrowded pitches seeking residential pitches in the area**

- 5.46 This was determined by survey data. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 13) their accommodation will no longer be overcrowded. The calculations suggest that there is a need for 10 additional pitches in the District to resolve overcrowding over the period 2019-2024 ('ethnic definition'), and 7 pitches ('PPTS' definition).

**Step 13: New family units expected to arrive from elsewhere**

5.47 In the absence of any sustainable data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the District moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. In addition, inflow equivalent to the outflow of newly forming family units must be considered. Together, these amount to a net inflow of 0 units in the District.

**Step 14: New family formations expected to arise from within existing family units on sites**

5.48 This was determined by survey data. The number of individuals needing to leave pitches to create new family units was estimated from survey data. Allowing for those planning to leave the area, and for estimated rates of marriages to both Gypsies and Travellers and non-Gypsies and Travellers, it is estimated that this will result in the formation of 20 new households requiring residential pitches over the period 2019-2024 ('ethnic definition'), and 17 pitches ('PPTS' definition).

**Step 15: Family units in housing with a psychological aversion to housed accommodation**

5.49 This was determined firstly by estimating the number of houses occupied by Gypsies and Travellers. Work undertaken by Shelter (2005) estimates that between one-half to two-thirds of the Gypsy and Traveller population are currently in bricks and mortar accommodation. From previous GTAA's undertaken by *RRR Consultancy Ltd* it is estimated that a minimum of 10% of Gypsies and Travellers residing in bricks and mortar accommodation experience psychological aversion and require accommodating on sites (10%). Given that there are 74 occupied, permanent authorised pitches within the District leads to an estimated need of 7 pitches deriving from psychological aversion ('ethnic definition'), and 5 pitches ('PPTS' definition).

**Balance of Need and Supply**

5.50 From the above the Total Additional Pitch Requirement is calculated by deducting the supply from the need.

Table 5.7: Summary of Gypsy and Traveller pitch needs 2019-24

	Ethnic	PPTS
Supply	9	9
Need	45	37
Difference	36	28

Source: GTAA 2019

## Requirement for residential pitches 2024-2035

5.51 Considering future need it assumed that those families with psychological aversion to living in brick and mortar will move onto sites within a 5-year period. As such, only natural population increase, mortality, and movement into and out of the District need be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.8 below. Please note that the 2019 base figures include both authorised occupied and vacant pitches, whilst the 2024 base figures assume that any potential pitches have been developed.

	2019 Base	Vacant	Potentials 2019-24	Need 2019-24	2024 Base
Ethnic	74	0	6	36	116
PPTS	74	0	6	28	108

Source: GTAA 2019

5.52 In March 2014 Brandon Lewis (Parliamentary Under Secretary of State within the Department for Communities and Local Government) confirmed that the 3% household growth rate does not represent national planning policy. Alternatively, it is suggested that an annual household growth rate of between 1.5% to 2.5% is more appropriate.

5.53 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.85 % per annum (compound) equating to a 5-year rate of 15.1% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. The rate is slightly higher than the 2.5% estimated upper limit as the average number of children per family is relatively high at 3.16 children. It is assumed that these rates are likely to continue during the period 2029-2035.

5.54 The following tables show the accommodation need for the periods 2024-2029, and 2029-2035<sup>24</sup>.

<sup>24</sup> Please note that in order to accord with the Council's Local Plan the 2029-2035 period of accommodation need is 6 years. The accommodation needs figures have been adjusted accordingly.

Table 5.9 Estimate of the need for residential pitches 2024-2029		
<i>Pitches as at 2024-2029</i>		
	<b>Ethnic</b>	<b>PPTS</b>
1) Estimated pitches occupied by Gypsies and Travellers	116	108
<i>Supply of pitches</i>		
2) Pitches expected to become vacant due to mortality 2024-2029	3	3
3) Number of family units on pitches expected to move out of the District	0	0
Total Supply	3	3
<i>Need for pitches</i>		
4) Family units moving into the District (100% of outflow)	0	0
5) Newly forming family units	18	16
Total Need	18	16
<i>Additional Need</i>		
Total additional pitch requirement, 2024-2029	15	13
Annualised additional pitch requirement	3	3

Source: GTAA 2019

Table 5.10 Estimate of the need for residential pitches 2029-2035		
<i>Pitches as at 2029-2035</i>		
	<b>Ethnic</b>	<b>PPTS</b>
1) Estimated pitches occupied by Gypsies and Travellers	131	121
<i>Supply of pitches</i>		
2) Pitches expected to become vacant due to mortality 2029-2035	4	3
3) Number of family units on pitches expected to move out of the District	0	0
Total Supply	4	3
<i>Need for pitches</i>		
4) Family units moving into the District (100% of outflow)	0	0
5) Newly forming family units	23	21
Total Need	23	21
<i>Additional Need</i>		
Total additional pitch requirement, 2029-2035	19	18
Annualised additional pitch requirement	4	4

Source: GTAA 2019

## Requirements for transit pitches / negotiated stopping arrangements: 2019-2035

- 5.55 The local authority recorded no instances of unauthorised encampments occurring within the District during the previous 3 years. However, a number of unauthorised encampments took place during the survey period of February 2019. As such, it is recommended that the Council considers setting up a negotiated stopping places policy. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.
- 5.56 Agreements could be made with households residing on sites allowing visiting family and friends to stay for agreed periods of time. This could lead to fewer unauthorised encampments which adversely impact on the local community.

### Summary

- 5.57 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. The survey recorded 82 households residing on 10 authorised sites, and 7 unauthorised encampments. Most households had resided on their respective site for more than 5 years. Accommodation need resulting from the calculations in the tables above are as follows:

Period	2019-2024	2024-29	2029-2035	Total
Ethnic	36	15	19	70
PPTS	28	13	18	59

Source: GTAA 2019

## 6. Travelling Showpeople living on yards

### Introduction

- 6.1 As described in Chapter 1, this GTAA considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. Nonetheless, government guidance (CLG 2012) indicates that local authorities should consider the accommodation needs of Travelling Showpeople families. Given the presence of Travelling Showpeople in the District and that they face similar accommodation issues to Gypsies and Travellers (e.g. difficulty in finding affordable land suitable for development) they have been included in this report.
- 6.2 There is one Showpeople yard located within the District. The yard has been used as the headquarters of Moscow State Circus since the 1940s. The Council regards this yard as 'winter quarters' i.e. one primarily used for storage. However, the yard is used for both storage and living quarters all year round.

### Population Characteristics

- 6.3 The consultation represented 40 Showpeople residing on permanent and temporary plots. The 2011 Census does not record Travelling Showpeople as a separate ethnic category, so it is not possible to make a comparison with Census results.
- 6.4 During the survey period (February 2018), there were 6 Travelling Showpeople households residing on 6 plots. The household size on each plot varied between 1 person and 4 persons. 1 household was of single occupancy, 2 households contained two people, 2 households contained 3 people, and 1 household contained 4 people. In relation to age of the 18 Travelling Showpeople permanently residing on plots, 7 were school age children, 10 were of working age, and 1 was of retirement age
- 6.5 There were also a further 22 people deriving mainly from Russia and Romania temporarily residing on the plots. These workers are employed by the circus and travel with it during the circus season. Out of season they reside on the yard if unable to return home. As the yard is used to store equipment, the accommodation of the temporary workers can lead to health and safety issues.

### Residency characteristics

- 6.6 The yard is owned by a circus consortium run by 3 Travelling Showpeople households, whilst three households rent plots from the consortium. Reflecting longevity of tenure, most of the households had lived on their plots for more than 5 years (some residents were born on the yard). The commitment of families to remaining in the local area is reflected in the fact that

all wanted to stay living together on the yard or to reside nearby. Households needing to move still wanted to reside close to the yard.

### **Satisfaction**

6.7 In terms of location residents were generally satisfied, but the limited space on the yard means that they are less satisfied with conditions. The extent to which residents can improve the yard is limited by financial and spatial constraints. Due to the large number of vehicles and equipment, and the lack of space between vehicles, equipment, and living quarters, most of the yard becomes muddy during the winter and dusty during the summer. One resident stated that the lack of space is exacerbated during periods when all vehicles and equipment are stored at the yard i.e. there is no touring.

### **Education and employment**

6.8 There are three households containing school age children (all whom attend school). None of the three households containing school age children have any special educational needs. In terms of employment, three related households are employed by the circus, whilst three households identify themselves as Travelling Showpeople, but work in alternative employment.

### **Accommodation need**

6.9 Households commented on the need for more permanent plots and yards in the District, and provision to accommodate visiting Travelling Showpeople families. According to respondent households, there is a need for both accommodation and storage space. They stated that the current yard is overcrowded and lacks space for maintaining equipment. As such, two households are in need of separate accommodation and there is a need for one plot to meet the future needs of one household.

### **Requirement for residential plots 2019-2024<sup>25</sup>**

6.10 The need for residential plots in the area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 6.8 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

6.11 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides two needs figures: one based on ethnic identify; and the other is based on PPTS 2015.

---

<sup>25</sup> Please note that due to rounding column totals may differ slightly from row totals

Table 6.1 Estimate of the need for permanent residential plots 2019-2024

	Ethnic	PPTS
1) Current occupied permanent residential site plots	6	6
<i>Current residential supply</i>		
2) Number of unused residential plots available	0	0
3) Number of existing plots expected to become vacant through mortality 2019-2024	0	0
4) Net number of family units on sites expected to leave the District in next 5 years	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0
6) Residential plots planned to be built or to be brought back into use 2019-2024	0	0
7) Less plots with temporary planning permission	0	0
Total Supply	<b>0</b>	<b>0</b>
<i>Current residential need: Plots</i>		
8) Family units (on plots) seeking residential plots in the area, 2019-2024, excluding those counted as moving due to overcrowding in step 11	0	0
9) Family units on transit plots requiring residential plots in the area	0	0
10) Family units on unauthorised encampments requiring residential plots in the area	0	0
11) Family units on unauthorised developments requiring residential plots in the area	0	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing an emerging family unit in step 8	2	2
13) Net new family units expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing family units on sites	1	1
Total Need	<b>3</b>	<b>3</b>
<i>Balance of Need and Supply</i>		
Total Additional Plot Requirement	<b>3</b>	<b>3</b>
Annualised Additional Plot Requirement	<b>1</b>	<b>1</b>

Source: GTAA 2019

### Requirement for residential plots 2019-2024: steps of the calculation

6.12 The calculations depend on base information derived from the GTAA using data corroborated by local authorities in the District. The key variables used to inform the calculations include:

- The number of existing plots
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary plots
- The number of vacant plots
- The number of planned or potential new plots
- The number of transit plots

6.13 The remainder of this chapter describes both the process and results of the Showpeople's needs calculations.

## **Supply of plots 2019-2024**

6.14 Supply (steps 1 to 7) steps are the same irrespective of the definition used.

### ***Step 1: Current occupied permanent site plots***

6.15 Based on information provided by the Council and corroborated by information from plot surveys. There are currently 1 yard with 6 permanently occupied authorised plots.

### ***Step 2: Number of unused residential plots available***

6.16 According to the survey data there are currently 0 vacant plots.

### ***Step 3: Number of existing plots expected to become vacant 2019-2024***

6.17 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of the communities suggesting a life expectancy approximately 10 years lower than that of the general population. As such, any plots becoming vacant due to mortality are unlikely to do so in first five years.

### ***Step 4: Number of family units in plot accommodation expressing a desire to leave the District***

6.18 This was determined by survey data. It was assumed, given that development of plots is likely to occur in the areas surrounding the Districts as well as in the planning area itself (which in the case of this GTAA is the same geographical area), that those currently living on plots expecting to leave the area permanently in the next five years – out of choice (step 4) or due to overcrowding (step 12) – would generally be able to do so. Given the low level of interest in leaving the District, this resulted in the supply of 0 plots.

### ***Step 5: Number of family units in plot accommodation expressing a desire to live in housing***

6.19 This was determined by survey data. It was assumed that all those currently living on plots planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded plot (step 11), would be able to do so.

6.20 A supply of 0 plots in the District were expected from this source, excluding those moving out of the District, since these are already counted in step 4.

### ***Step 6: Residential plots planned to be built or brought back into use, 2019-2024***

6.21 This is determined by local authority data and from an assessment of sites during visits. There are 0 plots in the District that are expected to be built or brought back into use in the

District during the period 2019-2024. This can include plots which have been partly developed or which were previously occupied but are now vacant and in need of redevelopment.

**Step 7: Plots with temporary planning permission**

6.22 This is determined by local authority data. It is assumed families living on plots whose planning permission expires within the period 2019-2024 will still require accommodation within the District. There are currently 0 plots with temporary planning permission located in the area.

**Need for plots 2019-2024**

6.23 There are three figures provided for the accommodation needs figures (steps 8 to 15). The first is based on ethnic identity, whilst the second is based on PPTS 2015 which excludes families who have permanently ceased to travel..

**Step 8: Family units on plots seeking residential plots in the District 2019-2024**

6.24 This was determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised plot, or that they were currently seeking accommodation.

6.25 This category of need overlaps with those moving due to overcrowding, counted in step 11, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need of 0 plots in the District.

**Step 9: Family units on transit plots seeking residential plots in the District 2019-2024**

6.26 This was determined by survey data. These family units reported that they required permanent plots within the District in the next five years. This generates a total need of 0 plots as there is no transit yard in the District.

**Step 10: Family units on unauthorised encampments seeking residential plots in the area**

6.27 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families living on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential plots in the District. Please note that only those requiring permanent accommodation within the District have been included in this calculation – transiting households are included in separate calculations. There were 0 households residing on unauthorised encampments were interviewed during the survey period, so there is a need of 0 arising from this source.

**Step 11: Family units on unauthorised developments seeking residential plots in the area**

6.28 This was determined by survey data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of plots given planning permission. There is a need of 0 plots deriving from unauthorised developments in the District.

**Step 12: Family units on overcrowded plots seeking residential plots in the area**

6.29 This was determined by survey data. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 13) their accommodation will no longer be overcrowded. The calculations suggest that there is a need for 2 additional plots in the District to resolve overcrowding over the period 2019-2024.

**Step 13: New family units expected to arrive from elsewhere**

6.30 In the absence of any sustainable data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the District moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. In addition, inflow equivalent to the outflow of newly forming family units must be considered. Together, these amount to a net inflow of 0 units in the District.

**Step 14: New family formations expected to arise from within existing family units on sites**

6.31 This was determined by survey data. The number of individuals needing to leave plots to create new family units was estimated from survey data. Allowing for those planning to leave the area, and for estimated rates of marriages to both Gypsies and Travellers and non-Gypsies and Travellers, it is estimated that this will result in the formation of 1 new household requiring residential plots during the 2019-2024 period in the District.

**Balance of Need and Supply**

6.32 From the above the net additional plot requirement is calculated by deducting the supply from the need.

Table 6.2: Summary of Travelling Showpeople plot needs 2019-24

	Ethnic	PPTS
Supply	0	0
Need	3	3
Difference	3	3

Source: GTAA 2019

### Requirement for residential pitches 2024-2035

- 6.33 Considering future need it assumed that those families with psychological aversion will move onto sites within a 5-year period. As such, only natural population increase, mortality, and movement into and out of the District need be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 6.2 below. Please note that the 2019 base figures include both authorised occupied and vacant pitches, whilst the 2024 base figures assume that any potential pitches have been developed.
- 6.34 In March 2014 Brandon Lewis (Parliamentary Under Secretary of State within the Department for Communities and Local Government) confirmed that the 3% household growth rate does not represent national planning policy. Alternatively, it is suggested that an annual household growth rate of between 1.5% to 2.5% is more appropriate.
- 6.35 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 1.52 % per annum (compound) equating to a 5-year rate of 7.8% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. It is assumed that these rates are likely to continue during the period 2028-2035.
- 6.36 The following tables show the accommodation need for the periods 2024-2029, and 2029-2035<sup>26</sup>.

<sup>26</sup> Please note that in order to accord with the Council's Local Plan the 2029-2035 period of accommodation need is 6 years. The accommodation needs figures have been adjusted accordingly.

Table 6.3 Estimate of the need for residential plots 2024-2029		
<i>Plots as at 2024-2029</i>		
	<b>Ethnic</b>	<b>PPTS</b>
1) Estimated plots occupied by Travelling Showpeople	9	9
<i>Supply of plots</i>		
2) Plots expected to become vacant due to mortality 2024-2029	0	0
3) Number of family units on plots expected to move out of the District	0	0
Total Supply	0	0
<i>Need for plots</i>		
4) Family units moving into the District (100% of outflow)	0	0
5) Newly forming family units	1	1
Total Need	1	1
<i>Additional Need</i>		
Total additional plot requirement, 2024-2029	1	1
Annualised additional plot requirement	0	0

Source: GTAA 2019

Table 6.4 Estimate of the need for residential plots 2029-2035		
<i>Plots as at 2029-2035</i>		
	<b>Ethnic</b>	<b>PPTS</b>
1) Estimated plots occupied by Travelling Showpeople	10	10
<i>Supply of plots</i>		
2) Plots expected to become vacant due to mortality 2029-2035	0	0
3) Number of family units on plots expected to move out of the District	0	0
Total Supply	0	0
<i>Need for plots</i>		
4) Family units moving into the District (100% of outflow)	0	0
5) Newly forming family units	2	2
Total Need	2	2
<i>Additional Need</i>		
Total additional plot requirement, 2029-2035	2	2
Annualised additional plot requirement	0	0

Source: GTAA 2019

### Requirements for transit plots / negotiated stopping arrangements: 2019-2035

6.37 There is no evidence of Travelling Showpeople residing on unauthorised plots within the District. However, given that friends and relatives of the current Travelling Showpeople families, as well as occasional Travelling Showpeople households travelling through the District, it is recommended that Council considers setting up a negotiated stopping places policy. The term 'negotiated stopping' is used to describe agreed short-term provision for

Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

- 6.38 Agreements could be made with households residing on sites allowing visiting family and friends to stay for agreed periods of time. This could lead to fewer unauthorised encampments which adversely impact on the local community.

## Summary

- 6.39 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Travelling Showpeople plots. The survey recorded 6 permanent households and 22 temporary workers residing on a Travelling Showpeople yard within the District. All 6 permanent Travelling Showpeople households had resided on the yard for more than 5 years. The households stated that the yard is overcrowded and dangerous due to a lack of space. Three households stated that they need separate accommodation in the near future. They stated that there is a need for more space to store and maintain equipment, and to accommodate the temporary workers.

- 6.40 Accommodation need resulting from the calculations in the tables above are as follows:

Table 6.5 Estimate of the need for residential plots 2019-2035				
Period	2019-2024	2024-29	2029-2035	Total
Ethnic	3	1	2	6
PPTS	3	1	2	6

Source: GTAA 2019

## 7. Conclusion and Recommendations

- 7.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new pitches, facilities, and recording and monitoring processes.
- 7.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the needs of Gypsy and Traveller sites and Travelling Showpeople, and then concludes with key recommendations.

### Policy Changes

- 7.3 As noted in Chapter 1, in 2012 the Coalition Government brought about new statutory guidance regarding Gypsy and Traveller accommodation. This built on earlier commitments to strengthen measures to ensure fair and equal treatment for Gypsies and Travellers in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
- 7.4 The new planning policy gave councils the freedom and responsibility to determine the right level of Gypsy and Traveller site and Travelling Showpeople plot provision in their area, in consultation with local communities and based on sound evidence such as GTAAs, while ensuring fairness in the planning system. It sat within a broader package of reforms such as the abolition of the previous government's Regional Strategies and the return of planning powers to councils and communities.
- 7.5 In August 2015 the DCLG published 'Planning Policy for Traveller Sites' (including Travelling Showpeople yards). It states that for the purposes of planning policy "gypsies and travellers" means:

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

- 7.6 In determining whether persons are "Gypsies and Travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:
- a) whether they previously led a nomadic habit of life
  - b) the reasons for ceasing their nomadic habit of life
  - c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

- 7.7 The accommodation needs calculations undertaken as part of this GTAA were based on analysis of both secondary data and primary surveys with Gypsies and Travellers. There is one known Showpeople living on a yard or in need of accommodation in the area.
- 7.8 In March 2016 the then Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances including, for example caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- 7.9 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, deletes sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the District in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

### Accommodation need

- 7.10 As discussed above and in previous chapters there are differing approaches to who constitutes a Gypsy and Traveller in planning terms. As such, Table 7.1 provides two needs figures: first, one based on ethnic identity definition and second based on the needs of families who have *not* permanently ceased to travel (i.e. based on the PPTS 2015 definition).
- 7.11 Whilst recognising that the August 2015 PPTS definition constitutes government policy, this GTAA argues that needs figures based only on households who do or do not travel in a caravan are likely to underestimate need and be open to legal challenges. Also, the ethnic approach is similar to that used by the council to allocate pitches i.e. travelling does not form any part of the allocation criteria. As such, this GTAA recommends a combination of the PPTS and ethnic definition figures. In doing so, it recommends that the council endorses the PPTS 2015 based accommodation needs figure as its main figure, and the ethnic-based accommodation needs as a ‘reserve’ figure. The difference between the lower PPTS and higher ethnic-based needs figures are 8 pitches within the first five years, and 11 pitches over the period 2019-2035.

Table 7.1: Summary of accommodation needs 2019-35 (pitches/plots)

Period	Ethnic definition	PPTS 2015 definition	Travelling Showpeople Need
Total 2019-24	36	28	3
Total 2024-29	15	13	1
Total 2029-35	19	18	2
Total 2019-35	70	59	6

Source: GTAA 2019

## Facilitating new provision

- 7.12 A key issue remains the facilitation of new sites. Most provision within the District consists of small, privately owned sites although there are two private rented sites and a local authority managed site. Most households on the site stated that they preferred small family sites.
- 7.13 Nationally, it is difficult to determine the extent to which new sites provided in the last 10 years are privately or publically owned as there are no national records. The July 2018 MHCLG Count shows that around a third of Gypsy and Traveller caravans were residing on social rented sites, whilst the remaining two thirds were residing on privately owned sites. Interestingly, this compares with the January 2010 DCLG Count which indicated that just under half of Gypsy and Traveller caravans were residing on social rented sites, whilst the remaining half were residing on privately owned sites. This suggests either that the provision of new social rented pitches has not kept pace with demand and/or that Gypsy and Traveller households prefer to reside on privately owned sites.
- 7.14 Each MHCLG Count provides details of all new local authority and Private Registered Provider sites opened since 1934 (although 38 sites are undated). In total, 28 local authority and Private Registered Provider sites have opened since 2010. The 28 new sites provide a total of 282 permanent pitches and 33 transit pitches able to accommodate 517 caravans.
- 7.15 Some Gypsy and Traveller sites are owned or managed by housing associations. Although MHCLG data does not distinguish between local authority and housing association owned/managed social rented sites, the July 2018 Count indicates that there are a total of 268 local authority sites or schemes owned and/or managed by local authorities or private registered providers.
- 7.16 Although the Homes and Communities Agency (HCA) (now 'Homes England') allocated £11.5m for the provision of new and improved sites within the 'Midlands' area for the period 2011-15, none of this funding was allocated to the District. Also, the HCA's 2015-18 Affordable Homes Programme (AHP) which included funds for new sites or pitches is now closed.
- 7.17 Analysis of the most recent HCA figures (September 2016) indicate that 2 new sites were funded by the AHP including a new site of 22 pitches in Darlington, and a new site of 22 pitches in Harlow. However, at £2.4m the combined funding for the 2 new sites represents only a small proportion of the total AHP funding of the £527m already allocated for new affordable homes. Given the above, it may be difficult for District local authorities to gain central government funding for new sites.
- 7.18 As with other accommodation needs assessments undertaken by *RRR Consultancy Ltd*, this assessment concludes that most Gypsy and Traveller families would prefer to reside on privately-owned family-sized sites, and that those who are unable to purchase land would still prefer to live on small sites.

- 7.19 The difference between potential local public and private provision is due to several factors. One factor is that, as acknowledged by stakeholders (see Chapter 4), the development process including the acquisition of land is too expensive for most Gypsy and Traveller families, and the perceived complexity of the planning process can also be a potential barrier. Another factor is that there has been a lack of finance for the development of publically owned sites for a number of years. Given current financial constraints on public expenditure, it is unlikely that this situation will change significantly in coming years.
- 7.20 This GTAA recommends that the local authority support and guide potential site developers through the planning application process from beginning to end. This could include contacting households who have previously displayed an interest in developing a new site but have not progressed to the planning application stage.
- 7.21 The local authority could consider helping to meet the needs of households unable to afford to own a site by renting or leasing small parcels of local authority owned land to them and assisting with planning applications and site development. Occupying families could be granted the option to wholly purchase the site at a later date.
- 7.22 The local authority could also consider sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to an extended Gypsy or Traveller family for their own use. These options might involve the families carrying out physical development of the site (self-build) with the land owner providing the land on affordable terms. Local councils might develop such initiatives or in partnership with Registered Providers. Local authorities could jointly examine their Strategic Housing Land Availability Assessments (SHLAAs) or Housing and Economic Land Availability Assessments (HELAAs) to identify suitable locations.
- 7.23 For example, Bristol City Council (2009) considered various options for facilitating new sites including: only purchasing land for self-build projects; purchasing land and providing infrastructure such as drains and electricity supply and/or making finance available for materials; providing pre-built pitches which are available to buy using shared- or part-ownership options<sup>27</sup>.
- 7.24 Another example is South Somerset District Council which has been exploring, in consultation with local travellers, ideas such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community<sup>28</sup>.

---

<sup>27</sup> For discussion of the benefits of community land trusts in relation to Gypsies and Travellers see: <http://www.gypsy-traveller.org/where-you-live-2/community-land-trusts/>

<sup>28</sup> *A Big or Divided Society?* Interim Recommendations and Report of the Panel Review into the Impact of the Localism Bill and Coalition Government Policy on Gypsies and Travellers.

7.25 As some accommodation need stems from psychological aversion to living in bricks and mortar, the council should also consider working with those living in houses and seeing how they can best help counteract this aversion, and review how and where they house Gypsies and Travellers into housing. Whilst looking into additional pitches (either through private or local authority provision), the council and other organisations need to review the type of housing and the needs of those living in bricks and mortar in order to minimise the psychological aversion and isolation.

### **Managing Gypsy and Traveller sites**

7.26 The Joseph Rowntree Foundation (JRF) (2016) undertook research on managing and delivering Gypsy and Traveller sites. Its case studies identified a variety of management approaches including:

1. Local authority owned and managed.
2. Arm's Length Management Organisation<sup>29</sup> (ALMO) or national housing association managed.
3. Local housing association managed.

7.27 Within the above three management approaches there are further typologies:

- a. A non-Gypsy/Traveller direct employee visits the site to undertake any management duties required.
- b. A Gypsy/Traveller direct employee who is non-resident on any of the sites visits them to undertake any management duties required.
- c. A Gypsy/Traveller site resident is employed by the organisation to undertake some management duties on that site and possibly other nearby sites. Site residents may refer to this role as a 'warden'.
- d. Multi-agency unit managed – normally this is led by a county council in an area and includes police, health and education officers in the team.
- e. Housing association proactively building and managing sites in an area.
- f. Private Gypsy/Traveller organisation managing sites on a lease agreement.
- g. Private Gypsy/Traveller managing sites acquired from council divesting stock.

7.28 Importantly, the report states that sites were most likely be developed and better managed where a 'grasp the nettle' culture had been adopted i.e. where officers, politicians and Gypsies and Travellers were engaged in attempting to meet ongoing need for site provision (p.17). The report concludes by making 12 key recommendations to housing bodies, local authorities and government agencies:

---

<sup>29</sup> A not-for-profit company that provides housing services on behalf of a local authority.

- Recognise that site provision is the key to resolving continuous unauthorised encampments in an area.
- Where sites are not already in existence, consider ‘negotiated stopping’, rather than eviction, as a more resource-efficient and humane approach to unauthorised encampments.
- Understand unauthorised encampments and lack of permanent sites as housing issues reflecting unmet accommodation needs.
- Have robust Gypsy and Traveller Accommodation Assessment data based on open channels of communication with residents.
- Identify sites in Local Plans and consult with Gypsies, Travellers and other residents on location of sites.
- Encourage elected members to play a key role in leading local debates on managing and delivering sites, supported through training and by national political leadership.
- Recognise a duty to promote equality in this area and challenge discriminatory discourse about Gypsies and Travellers as part of this.
- Plan for a mixture of tenure, size and location for new Gypsy and Traveller sites, as with general housing stock.
- Bring in Gypsy and Traveller accommodation alongside other social housing, in terms of policies, administration and standards of management.
- Recognise that a well-run site will not cost money in the long term (income can cover costs) but capital funding is needed initially to support delivery.
- See information sharing as key to good management: inefficiencies occur when lines of accountability between departments and agencies are blurred.
- Pay careful consideration to future management and ownership issues when undertaking reviews of local authority sites.

### **The location of new provision**

- 7.29 A high proportion of the need stems from a combination of hidden households and households with children needing separate accommodation within the next 5 years. As well as new sites, subject to consideration of constraints and other material planning considerations, some of this accommodation need could be met by the expansion of some of the private sites and some by the local authority building new provision at a different location.
- 7.30 The local authority site is not suitable for expansion. The level of occupancy of the existing site needs to be considered as it is already overcrowded and there is minimum space for households residing on the site.
- 7.31 The accommodation need of 6 of the 8 households residing on unauthorised encampments during the survey period will be met by 6 pitches that are currently under development (shown as potential pitches in table 5.6 above).

- 7.32 Stakeholder and Gypsy and Traveller household comments suggested that smaller sites are preferred by Gypsy and Traveller households due to better management and maintenance of sites and feeling safer. Ongoing monitoring of site provision and vacant provisions should be undertaken by the local authorities alongside discussions with Gypsies and Travellers, to ensure that any additional need that may arise is identified. The precise location (along with design and facilities) will, however, need to be drawn up in consultation with Gypsies and Travellers to ensure that extra provision, beyond the two that can be met via the two vacant pitches on site meet their needs.
- 7.33 Ensuring that new sites are located in a safe environment is important although the impact of land costs on determining feasibility must also be considered. The settled community neighbouring the sites should also be involved in the consultation from an early stage. There may be scope for expanding existing sites to meet some arising need. However, in relation to Gypsies and Travellers, the preference is for smaller sites which tend to be easier to manage. Whilst considering intensifying or expanding sites, it is important to consider the possible constraints linked to factors and constraints such as some sites being located within the Green Belt. Also, it is important that any new provision is not located too close to existing (especially larger) sites.
- 7.34 In terms of identifying broad locations for new permanent sites, there are a number of factors which could be considered including:

*Costs*

- How do land costs impact on feasibility i.e. is it affordable?
- Implementation of services – is it possible for the new site to connect to nearby mains services e.g. electricity, gas, water or sewerage?
- Can good drainage be ensured on the new provision?

*Social*

- Does the proposed location of the new provision lie within a reasonable distance of school catchment areas?
- Sustainability – is the proposed location close to existing bus routes?
- Proximity of social and leisure services – is the proposed location close to leisure facilities such as sports centres, cinemas etc. or welfare services such as health and social services etc.

*Availability*

- Who owns the land and are they willing to sell / rent?
- Is access easy or will easements across other land be needed both for residents and services/utilities?
- Are utilities close enough to service the provision at realistic prices?

*Deliverability*

- Does the proposed location meet existing general planning policy in terms of residential use, for example in relation to flooding and the historic environment)?
- Can the owner sell the land easily and quickly?
- Can utilities connect to the proposed provision?
- Can highways connect to the proposed provision?

7.35 Considering the evidence gathered throughout the GTAA, it is likely that the key factors determining new provision in the District are:

- The affordability of land suitable for the development of new sites and the cost of development
- The need to ensure that new provision are within reasonable travelling distance of social, welfare and cultural services
- The need to carefully consider the proximity of new provisions to existing provisions i.e. whether social tensions might arise if new provisions are located too close to existing provisions
- The sustainability of new provisions i.e. ensuring that they do not detrimentally impact on the local environment and do not place undue pressure on the local infrastructure

7.36 It is important that new provisions are located close to amenities such as shops, schools and health facilities and have good transport links. DCLG (2015) guidance suggests that local planning authorities should strictly limit new Gypsy and Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

7.37 It also states that when considering applications, local planning authorities should attach weight to the following matters:

- a. effective use of previously developed (brownfield), untidy or derelict land
- b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
- c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
- d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community

7.38 In some instances it may be necessary for the identified need to be met outside of the local authority where it arises, and local planning authorities should work together under the Duty to Co-operate where this is the case.

## The size of new provision

- 7.39 DCLG (2008) guidance states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.
- 7.40 Based on previous and current DCLG guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500 square metres (0.05ha) would comfortably accommodate the following on-pitch facilities:
- Hard standing for a touring caravan (enabling households to travel)
  - Hard standing for a static caravan (including double static trailers)
  - 2 car parking spaces
  - 1 amenity block
  - Hard standing for storage shed and drying
  - Garden/amenity area
- 7.41 If granting permission on an open plan basis, permission should be given on a pitch by pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, 2 touring caravans and 1 – 2 static caravans along with 4 parking spaces, 2 blocks etc., could be counted as 2 pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

## Transit provision

- 7.42 We recommend that the local authority sets up a negotiated stopping places policy. This is land temporarily used as authorised short-term (less than 28 days) stopping places. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the agreed location for a few days. Amenities such as portaloos and showers (or access to alternative nearby facilities) and skips or wheelie bins should ideally be made available for the duration of the agreed period.
- 7.43 Agreements could be made with households residing on sites allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community.

## Summary

- 7.44 There is an overall accommodation need in the local authority area over the period 2019-2035 for 70 additional pitches (ethnic definition), and 59 pitches (PPTS 2015 definition) residential pitches. There is also a need for 6 additional Travelling Showpeople plots during the same period. It is recommended that the council has a corporate policy in place to address negotiated stopping places for small scale transient encampments, and that it works with neighbouring authorities to determine the location and size of new transit provision.
- 7.45 It is recommended that the council incorporate both the PPTS and the ethnic calculations into their local plan. The council could work with the PPTS definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the council would firstly meet the need of 59 (28 within the first five years) as its obligation, but accept the need of a further 11 (8 within the first five years) as potential need in the area, if further applications are brought forward through windfalls. It is important to note, that this only refers to Gypsies and Travellers and not Travelling Showpeople.
- 7.46 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

### *Planning policy:*

- Refine the criteria and processes for determining the suitability of Gypsy and Traveller sites, as indicated above for including in emerging/future Local Plans.
- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the small, privately owned sites to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To liaise with the Travelling Showpeople households with need to help identify land to meet their need.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.
- To consider alternative options for developing new sites such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller and Travelling Showpeople communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

*Management:*

- For the council to work more closely with the management team of the local authority site. There needs to be closer monitoring of the maintenance and management of the site including regular maintenance and health and safety checks. They also need to jointly review the condition and management of the site.
- Consider employing a coordinator who would support the needs of Gypsies and Travellers residing on the sites, in bricks and mortar accommodation, or on unauthorised encampments. The coordinator would be the first point of contact for Gypsies and Travellers and would liaise with relevant agencies and service providers.
- Housing organisations need to review the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide regular training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller communities.



---

# Bibliography

Brown, Philip, *Advice for Warwick District Council on household formation relating to Gypsy and Traveller pitches*, Sustainable Housing & Urban Studies Unit (SHUSU), University of Salford, October 2015.

Cemlyn, Sarah, Greenfields, Margaret, Burnett, Sally, Matthews, Zoe and Whitwell, Chris (2009) *Inequalities Experienced by Gypsy and Traveller Communities: A Review*, Equality and Human Rights Commission, London.

Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers* - Report of a CRE inquiry in England and Wales, (Summary), May 2006.

Cullen, Sue, Hayes, Paul and Hughes, Liz (2008), *Good practice guide: working with housed Gypsies and Travellers*, Shelter, London.

DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007.

DCLG, *Planning Policy for Traveller Sites*, August 2015.

DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.

Department of Education, Schools, pupils and their characteristics, January 2018 located at: <https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2018>

House of Commons Library, *Gypsies and Travellers: Planning Provisions*, Briefing Paper 07005, 4 January 2016.

Liegeois, J. P. (1994) *Romas, Gypsies and Travellers*, Strasbourg: Council of Europe.  
Mid Suffolk Development Plan Document, Adopted 2008.

Ministry of Housing, Communities and Local Government (MHCLG), *January 2018 Traveller Caravan Count*, June 2018.

Niner, Pat (2003), *Local Authority Gypsy/Traveller Sites in England*, ODPM.

Niner, PM (2004) 'Accommodating Nomadism? An Examination of Accommodation Options for Gypsies and Travellers in England', *Housing Studies*, Carfax Publishing.

Niner, Pat, *Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System*, ODPM, February 2004 located at <http://www.communities.gov.uk/documents/housing/pdf/158004.pdf>.

ONS 2011 *Census Table KS201EW Ethnic Group* located at: <http://www.ons.gov.uk/>

Stratford-on-Avon DC, *Intention to prepare a Local Plan*, March 2014

Stratford-on-Avon DC, *Consultation on Implementation Options*, September 2015

Stratford-on-Avon DC, *Core Strategy 2011-2031* Adopted July 2016.

Stratford-on-Avon DC, Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

Stratford-on-Avon DC, Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire, 6 December 2016.

TRS, *Economic Impact of Tourism on Stratford Town* 2017.

# Glossary

## **Amenity block**

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

## **Authorised site**

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

## **Average**

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

## **Bedroom standard**

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers living on sites to take into account that caravans or mobile homes may contain both bedroom and living spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

## **Bricks and mortar accommodation**

Permanent housing of the settled community, as distinguished from sites.

## **Caravan**

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960 a caravan as:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

## **Concealed household**

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

## **Doubling up**

More than one family unit sharing a single pitch.

**Emergency stopping places**

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

**Family Owner Occupied Gypsy Site**

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

**Family unit**

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Gypsy**

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

**Gypsy and Traveller**

As defined by DCLG Planning Policy for Traveller Sites (August 2015):

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

The DCLG guidance also states that in determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

**Household**

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Irish Traveller**

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

**Local Authority Sites**

The majority of local authority sites are designed for permanent residential use. The latest published Traveller Caravan Count undertaken in January 2017 suggests that there are a total of 5,850 permanent local authority and private registered provider pitches capable of housing 9,557 caravans.

**Local Development Documents (LDD)**

Local Plans and other documents that contain planning policies and are subject to external examination by an Inspector. It is important to note that Supplementary Planning Documents (SPDs) contain guidance are not subject to Examination. Planning applications are determined in relation to an adopted Development Plan which contains documents found to be sound at an External Examination.

**Negotiated Stopping**

The term 'negotiated stopping' is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

**Net need**

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

**New Traveller (formerly 'New Age Traveller')**

Members of the settled community who have chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

**Newly forming families**

Families living as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

**Overcrowding**

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

**Permanent residential site**

A site intended for long-stay use by residents. They have no maximum length of stay but often constraints on travelling away from the site.

**Pitch**

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

**Plot**

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

**Primary data**

Information that is collected from a bespoke data collection exercise (e.g. surveys, focus groups or interviews) and analysed to produce a new set of findings.

**Private rented pitches**

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

**Psychological aversion**

An aversion to living in bricks and mortar accommodation. Symptoms can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to living in bricks and mortar accommodation is one factor used to determine accommodation need.

**Secondary data**

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

**Settled community**

Used to refer to non-Gypsies and Travellers who live in housing.

**Site**

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident, or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through

to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

**Socially rented site**

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offers at below private market levels.

**Tolerated**

An unauthorised development or encampment may be tolerated by the local authority meaning that no enforcement action is currently being taken.

**Transit site/pitch**

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

**Travelling Showpeople**

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

**Unauthorised development**

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

**Unauthorised encampment**

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

**Unauthorised site**

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.