

Herefordshire GTAA 2015: arc⁴ response to consultation responses

Response to Queries May 2015

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1. Introduction

- 1.1 In February 2015 arc⁴ produced a Gypsy and Traveller and Travelling Showperson Accommodation Assessment for Herefordshire Council based on primary research undertaken during 2014. The Council subsequently consulted with stakeholders on the report and its' findings.
- 1.2 This document responds to some of the issues raised by consultees in respect of the report and its' findings. Issues raised by stakeholders to be addressed within this report include:
- Methodology, including the approach used to secure interviews from households living in bricks and mortar accommodation and engagement around the duty to cooperate; and
 - The inclusion of turnover within the needs assessment.

2. Methodology for the GTAA

- 2.1 arc⁴ were commissioned to undertake the Herefordshire GTAA in July 2014 to identify the housing needs of Gypsies and Travellers and Travelling Showpeople from across Herefordshire. The objective of the Gypsy Traveller Accommodation Assessment is to inform the emerging Local Plan policies and allocations. The research provides information about the current and future accommodation needs and demands of Gypsies and Travellers and Travelling Showpeople; as well as providing information about their additional support needs
- 2.2 The methodology for this study comprised:
- Interviews with Gypsies, Travellers and Travelling Showpeople (139 interviews were achieved);
 - Desktop analysis of existing documents, data and pitch information; and
 - A Key Stakeholder on-line questionnaire for professionals who have direct contact with local Gypsy and Traveller and Travelling Showpeople communities.
- 2.3 The primary fieldwork for this study comprised survey work with Gypsies and Travellers and Travelling Showpeople. The fieldwork was managed by Home Space Sustainable Accommodation (HSSA) and undertaken by Gypsy and Traveller fieldworkers. HSSA was involved in the design of the questionnaire and in the recruitment and management of fieldworkers. The questionnaire has been developed over many years working closely with HSSA, who are Travellers themselves; it is a 'tried and tested' questionnaire that delivers, and provides an effective mechanism for collecting information from the local communities.
- 2.4 HSSA engage with local community fieldworkers. Fieldwork was conducted between 23rd September 2014 and 21st October 2014. All dates and times of fieldwork interviews are recorded. The survey is completed in confidence and the anonymity of participants is guaranteed (it is therefore inappropriate to ask

residents whether or not they have participated in the survey; the confidentiality of participants is paramount).

- 2.5 To undertake the fieldwork the Council provided arc⁴ with a list of all authorised sites / pitches, authorised yards / plots and known unauthorised encampments in Herefordshire. arc⁴ were also given the contact details of eight Traveller households living in bricks and mortar in Herefordshire who had agreed to participate in the GTAA (based on information provided by the County Council). We pass on details of bricks and mortar households to our field-team who endeavour to contact them.
- 2.6 A total of 139 interviews were secured: 100 with households living on a pitch on an authorised site, 18 on private tolerated pitches, 11 with households living on unauthorised sites and 10 Travelling Showperson households. No interviews were secured with households living in bricks and mortar accommodation during the fieldwork process.
- 2.7 In conjunction with interviews with members of the Gypsy and Traveller and Travelling Showpeople communities, a range of complementary research methods have been used to permit the triangulation of results. This includes a review of caravan counts, analysis of unauthorised transit encampments and stakeholder consultation.

Bricks and mortar

- 2.8 In the absence of any achieved interviews with households living in bricks and mortar accommodation the study seeks to provide guidance to the Council in respect of potential need from these households for accommodation on pitches on sites based on cumulative experience elsewhere (para 6.22 of main report).
- 2.9 Based on our experience of interviews with 180 households living in bricks and mortar accommodation across 39 other local authorities, 14.4% of these households would prefer to live on a pitch on a site. Applying this extrapolation to Herefordshire equates to a requirement for 14 additional pitches for the period 2014/15 to 2018/19.
- 2.10 If this were factored into analysis, the overall shortfall over the period 2014/15 to 2018/19 would increase to 64 (excluding turnover) and 14 (including turnover).

Duty to cooperate

- 2.11 The duty to cooperate extends to neighbouring local planning authorities, all of whom were invited to participate in the online survey.
- 2.12 The online survey of stakeholders represents a cost effective way for the Council to seek, as part of the study, the views of as many respondents as possible on key issues relating to Gypsies and Travellers locally (for example, existing provision, the need for new provision, unauthorised encampments). There is no limit on the number of people that can be consulted via the online survey, including community representatives.

- 2.13 The survey in itself does not discharge the Council's responsibility under the duty to cooperate; it contributes towards it. It is up to the Council to consult further on its proposed next steps in terms of policy and implementation.

3. Needs assessment: turnover

- 3.1 When undertaking research into the future housing requirements of households in a housing system, it is vital that both need and supply factors are taken into account. These are explored in detail in the main report (Table 6.1), and summarised in Table 1 of this document.
- 3.2 One of the key aspects of supply relates to the ability of households to move onto a pitch which had previously been vacated. Data collected as part of the GTAA allows for a detailed analysis of who has moved onto a pitch and uses this as a basis for estimating the likely supply of existing pitches coming forward in the future. Turnover rates over the previous five years provide the most up-to-date and robust evidence available of likely future turnover rates for the next five years.
- 3.3 The 2007 CLG Guidance on preparing GTAA's (Para 62 bullet 2 – page 17) says that pitch turnover on managed sites is information currently held by local authorities that can be used to inform the assessments. CLG consultation on Planning and Travellers (September 2014) provides draft Guidance on undertaking GTAA's in Annex A. Paragraph 4 lists sources of information that local authorities can use in assessing Traveller accommodation needs. One of the sources of information is site management information, including pitch turnover.
- 3.4 The principle of including turnover in assessing Traveller accommodation needs is therefore accepted in Guidance. It is also consistent with the approach in Strategic Housing Market Assessments (SHMAs) which also take account of turnover.
- 3.5 The 2015 GTAA considers the overall need for pitches arising from existing and newly-forming households from within Herefordshire. This analysis takes into account need from existing households on pitches and newly-forming households. This results in an overall need for 185 pitches over the period 2014/15 to 2018/19 in Herefordshire.
- 3.6 In terms of supply of pitches to address this overall need, analysis considers current pitch supply and current vacant pitches. For Herefordshire, the total supply is 179 pitches. All authorised sites, irrespective of occupancy conditions, meet the needs of current Gypsy occupants and are therefore part of the supply of Traveller pitches in the District.
- 3.7 Therefore, total need minus supply, as reported in row 7 of Table 6.1 is 50 pitches for Herefordshire excluding turnover, and six including turnover.

Table 6.1 Summary of need and supply factors: Gypsies and Travellers			
NEED		Herefordshire Total	
1.	Current households living on pitches	1a. On LA Site	53
		1b. On Private Site – Authorised	61
		1c. On Private Site – Tolerated	21
		1d. Unauthorised	7
		1e. TOTAL (1a to 1d)	142
2	Current households in bricks and mortar (2011 census estimate)	2a. TOTAL	100
3	Existing households planning to move in next 5 years	Currently on sites	
		3a. To another pitch/same site	0
		3b. To another site in study area	13
		3c. To Bricks and Mortar	0
		3d. To another site/bricks and mortar outside study area	0
		3de TOTAL net impact	0
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site	38
		4b. Currently on site and planning to live on another site in study area	5
		4c. Currently on site and planning to move outside study area	0
		4d. TOTAL (4a+4b)	43
5	Total Need	1e+3e+4d	185
SUPPLY		Total	
6	Current authorised pitches (including private tolerated)	6a. Current occupied authorised and tolerated pitch provision (excluding turnover)	135
		6b. Vacant authorised pitches	0
		6c. Total current supply (excluding turnover) 6a+6b	135
7	Need minus supply (excluding turnover)	6c – 5	50
8	Turnover on existing permanent authorised pitches	8a. Annual	9
		8b. 5 years	44
9	Total supply of pitches	9a. Current authorised/tolerated pitch provision and turnover (6c+8b)	179
RECONCILING NEED AND SUPPLY		Total	
10	Total need for pitches	5 years (from 5)	185
11	Total supply of authorised and tolerated pitches	5 years Excluding turnover (from 6c.)	135
12	Total supply of authorised and tolerated pitches and turnover	5 years Including turnover (from 9)	179
5 YEAR AUTHORISED PITCH SHORTFALL (2014/15 TO 2018/19) excluding turnover (10-11)			50
5 YEAR AUTHORISED PITCH SHORTFALL (2014/16 TO 2018/19) including turnover (10-12)			6

Source: Table 6.1 of the GTAA report

3.8 Here we respond to problems identified with this approach by respondents.

Our approach to turnover

- 3.9 The principle of using turnover is established practice in SHMAs and it is therefore appropriate to consider its use within GTAAs, given that Travellers do move pitch and relocate. The use of turnover is also appropriate within GTAA Guidance (see para 3.3).
- 3.10 Based on our experience elsewhere, an analysis of GTAAs for 39 local authorities, which included interviews from 1,438 households, identified an annual turnover rate of 13.9%. This is the proportion of pitches which are likely to become available for occupancy on an annual basis.
- 3.11 Analysis within the GTAA considers the extent to which households are likely to move and release pitches for occupation by other households. The household survey asks how long households have lived on their current pitch; and also if they are planning to move in the next five years.
- 3.12 The GTAA questionnaire collects detailed information on how long households have lived on pitches, where they came from and the reason for moving. From this information, it is possible to calculate the number of pitches coming available for households originating or having a connection with Herefordshire.
- 3.13 The household survey indicates that 89 households currently living on authorised sites have lived on their current pitch for less than five years. This means that 78.1% of households have moved to their current pitch in the last five years which suggests an annual turnover rate of 15.6%.
- 3.14 Further analysis of the origins and reasons for moving indicates that 51% of households moving to a pitch either originated in Herefordshire or had a connection with the area. The remaining 49% moved to Herefordshire but had no connection with the area.
- 3.15 Although the majority of households have stated that they do not intend to move in the next five years, past trends in household mobility would suggest that 44 pitches are likely to become available to households from, or with a connection to, Herefordshire over the next five years.

Survey findings

- 3.16 The extent to which pitches are likely to become available was factored into the needs analysis resulting in an overall shortfall of six pitches in Herefordshire over the five years 2014/15 to 2018/19. This excludes an addition 14 pitches which may be required from households living in bricks and mortar accommodation and preferring to live on a pitch.
- 3.17 Analysis assumes that the scale of pitches coming available will reflect patterns over the past 5 years. The evidence from the household survey clearly demonstrates a high degree of mobility, with 81% of households moving to their current place of residence in the past five years. In contrast, the vast majority of respondents (86%) said that they planned to stay where they are over the next five years. This marked variation in a lack of intention to move compared with the

actual reality of the scale of movement is regularly reported in survey work. The analysis considers historic mobility as a basis for predicting the likely availability of pitches available for occupancy, and specifically for households with a connection with Herefordshire.

- 3.18 It should also be acknowledged that pitch vacancies can arise from a number of factors including the death of the occupant, a move to bricks and mortar accommodation, as well as migration out of the area. The model within the report includes a pitch requirement including and excluding turnover
- 3.19 It may be appropriate to review the scale of turnover reported on some sites as the high level of movement may have been driven by factors which have been highlighted in comments received by the Council, including: the development of new pitches in past 5 years; the refurbishment of at least one main site; and more positive management of other sites which has made them more popular. We would be happy to discuss further with the Council a review of turnover figures in the light of these comments. However, we maintain a need to consider an element turnover on pitches, as it is an important component of the modelling process.

4. Other points raised

4.1 Other points raised through the consultation are responded to here.

4.2 The study:

- Fails to identify the precise location of sites listed in Table 4.1. It would be helpful to be provided with a map to pinpoint the location of sites.

Our reports usually contain a map indicating the location of sites and this can be added to the report if the Council wish.

- Fails to indicate which sites in Table 4.1 are private / socially provided. The pitch numbers for socially provided sites fails to correspond with the details on the Council's website which is a little disconcerting. I can see no reference to the site at Madley which may still be regarded as a transit site.

Tenure details are usually included within our reports and can be included here if the Council wish. We were asked to exclude details of tenure due to concerns over with site identification.

- Fails to list the planning history for site provision to show how and where new sites have been provided over the last ten years. For instance it would be helpful to know how many new pitches have been granted permission and are actually provided on socially provided/ private sites.

The study provides an up to date position of sites known to the Council. The list of sites was compiled with careful consideration, and the Council were fully engaged in this process. Paragraph 4.5 of the GTAA lists new provision delivered in Herefordshire between 2011/12 and 2013/14.

- Fails to explain how many sites have been refurbished and made available in the last 5 years on appeal or by planning application.

Paragraph 3.4 provides details of refurbished sites over past five years, where this information is known to the Council.

- Fails to detail where the 7 unauthorised/ tolerated sites are with 28 pitches.
This can be listed within Table 4.1 of the report as per the second bullet point above. This information has presumably been excluded due to concerns about its local sensitivity as it is standard practice for us to include this in our reports.
- Fails to record any interviews with families in housing.
Although no interviews were secured with households in bricks and mortar accommodation, the potential need for 14 pitches based on 100 households was included in the report.
- Fails to record details of waiting lists and site allocations for the socially provided sites.
This information can be included within the report should the Council decide it wishes to include, and can provide, it.
- Fails to provide any indication of the type of site needed (i.e. ratio of social provision to private provision). The summary states that DCLG guidance advocates smaller permanent sites of between six and 12 pitches. I do not recognise this. The 2007 guidance makes clear in par 4.7 that there is no one ideal size of site or number of pitches and suggests no more than 15 pitches but recognises that smaller sites of 3-4 pitches can also be successful. Table 4.1 suggest that there is a range of site sizes in Herefordshire.
- *The survey asks about pitch tenure preference. Recommended tenure splits are not made due to uncertainty over availability of public resources for new provision. The reference to ideal site size can be amended if required*
- Table 6.1 is confusing as existing households settled on sites are included as need. This is not standard procedure. Similarly existing occupied sites cannot count towards supply. It would be much more helpful if the table omitted existing pitches from supply and need.
- *See para 3.1.*
- Longer term requirements also assume household formation based on half those reaching the age of 18 over until 2029. Whilst I do not take issue with this assumption, this assumes that all current 18 year olds or older have their own pitch and are not doubling up with parents. This formation rate will be distorted by the conclusion that there is an immediate need for only 6 additional pitches and not 50. I consider that it underestimate the true need for future need for pitches.
- *Longer-term pitch requirements is based on an analysis of the demography of all current households living on pitches and is independent of the analysis of the first five years.*