

# Herefordshire Council Gypsy and Traveller Accommodation Assessment

## Final Report

April 2022

*RRR Consultancy Ltd*







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# Executive Summary

## Introduction

- S1. In April 2020 Herefordshire Council commissioned *Iceni Projects* to undertake a Housing Market Area Needs Assessment (HMNA) for the period 2021-2041. A key element of the HMNA is to determine the accommodation needs of Gypsies, Travellers and Travelling Showpeople (it should be noted that at the time of the GTAA there were no boat dwellers residing in the local authority area). The Gypsy and Traveller Accommodation Assessment (GTAA) component of the HMNA was subcontracted to *RRR Consultancy Ltd*.
- 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 Traveller Sites (DCLG, 2015). The results of the GTAA will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources.
- 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 2021) DLUHC Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - An online survey and telephone interviews with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Showpeople.
  - Extensive face-to-face surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs took place in February 2022. 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 PPTS (2015) 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 this GTAA provides two needs figures: first, a needs figure based on ethnic identity; and second, a figure based on the PPTS (2015) definition. Using this method 'future-proofs' the Accommodation Needs Assessment and

ensures that the revised definition is applied in both a fair and objective manner. As all Travelling Showpeople travel for work purposes, only one accommodation needs figure is provided in relation to this community.

- S6. In terms of local planning policy, Policy H4 of the Core Strategy (2011-2031) states that the accommodation needs of travellers will be provided for through the preparation of a Travellers' Sites Document (DPD) which will include site specific allocations. The DPD was finalised in October 2019. It provides for a five-year supply of pitches for those travellers that meet the definition as set out in PPTS (2015). It confirms that the Core Strategy update will consider the longer-term unmet needs of those meeting the definition within the Planning Policy for Traveller Sites (August 2015) as well the needs of Travellers outside of the definition. Policies TS1 and TS2 of the DPD outline the criteria for determining the location of new sites and yards where they conform to Policy H4 of the Core Strategy.

## Population Trends

- S7. There has been a travelling community in Herefordshire for the last 500 years. Travellers live in different ways, including permanently 'on the road', in caravans or mobile homes, or in settled accommodation (for part or all of the year). In Herefordshire there are a number of small privately owned traveller sites and larger sites that are managed by Herefordshire Council. There are 38 Gypsy and Traveller sites located within the local authority area – consisting of 45 pitches on 6 local authority sites (although in April 2022 12 pitches on 2 local authority sites were closed for refurbishment), 44 pitches on 30 private sites, and 14 pitches located on 2 unauthorised developments. There are also 4 Travelling Showpeople yards consisting of 10 plots.
- S8. The 2011 Census suggests there were 183 Gypsies and Travellers residing in Herefordshire representing about 0.09% of the total population. The 2011 Census also records a total of 125 Gypsy and Traveller households residing within the county of which the majority were residing in social rented accommodation. The DLUHC July 2021 Caravan Count shows there were 148 Gypsy and Traveller caravans located in Herefordshire. When population size is considered the proportion in Herefordshire is 76 caravans per 100,000 population which is higher in comparison to Shropshire (59) and Gloucestershire (74) but lower in comparison to Worcestershire (134).
- S9. Herefordshire Council collects extensive data on unauthorised encampments taking place throughout the county. Between January 2018 to January 2022 67 unauthorised encampments took place in the county with a peak of 14 in the period July to September 2017, before declining to 3 in the period January to March 2022. The number of unauthorised encampments has steadily increased throughout the 4-year period. However, it is likely that restrictions due to Covid-19 may have impacted on travelling patterns from March 2020 onwards. On average, each unauthorised encampment consisted of 4 vehicles and lasted 25



days. Unauthorised encampments took place in many various locations around the county although they commonly took place in Ross, Leominster, Hereford, and Ledbury.

## Stakeholder Consultation

- S10. Consultation with a range of stakeholders was conducted to provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers, and Showpeople. 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 county.
- S11. The consultation with key stakeholders offered important insights into the main issues within the county. It was recognised that there is a long history of Gypsies, Travellers and Showpeople in the county with large numbers of Travellers in Herefordshire due to the historic farm work available in the 1970s and 80s. However, there is a lack of accommodation provision throughout the county and in some neighbouring authorities. According to stakeholders, private family sites tend to be well maintained and households residing on them integrate well into the local community.
- S12. There was general agreement by stakeholders that it can be difficult for Gypsies and Travellers to access health and education services. Whilst there has not been a health service which specifically supports the Gypsy and Traveller community in Herefordshire for over 10 years, Herefordshire Council provides a holistic education support service for Gypsy, Roma and Traveller (GRT) families. Whilst acknowledging that relations between the Gypsy and Traveller, and settled community can be difficult, stakeholders suggested various ways in which relations could be improved including using grassroots community work to build trust between the communities. Finally, stakeholders stated that communication between Herefordshire Council and neighbouring authorities is good, although there may be need for better communication between different departments and agencies.

## Consultation with households

- S13. Consultation was undertaken with Gypsy, Traveller, and Showpeople households, key stakeholders (in particular the Showmen's Guild), and site owners. The combination of local authority data, site / yard visits, and consultation with households and key stakeholders helped to clarify the status of pitches and plots i.e. which provisions are occupied, vacant, overcrowded, and occupied by household members with accommodation needs. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including site and yard owners, neighbours, and relatives) was undertaken, some of which was undertaken over the telephone.

## Accommodation need

- S14. Accommodation need in the study area was assessed using analysis of primary and secondary data. The accommodation needs calculation steps were based on a model in accordance with both previous (2007) and current practice guidance i.e. Planning Policy for Traveller Sites (PPTS) (2015). Although the 2007 guidance was withdrawn in 2016, it remains useful as a model to determine accommodation needs. It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data.
- S15. Table S1 summarises accommodation need of Gypsies and Travellers over a 20-year period. It is important to note that the figures shown in Table S1 include all need as of 2022, including any which may have been identified by previous GTAA's but remained unfulfilled by January 2022. The table shows that a further 41 Gypsy and Traveller pitches (based on the ethnic identity definition), or 35 pitches (based on PPTS 2015) are needed over the 20-year period.

### Gypsies and Travellers

Period	Ethnic definition	PPTS 2015 definition
2021-26	14	10
2026-31	8	8
2031-36	9	8
2036-41	10	9
<b>Total 2021-41</b>	<b>41</b>	<b>35</b>

Source: GTAA 2022

- S16. Table S2 shows that there is also a need for 9 additional Travelling Showpeople plots over the 20-year period.

### Travelling Showpeople

<i>Table S.2: Summary of Travelling Showpeople accommodation needs 2021 41 (plots)</i>	
2021-26	6
2026-31	1
2031-36	1
2036-41	1
<b>Total 2021-41</b>	<b>9</b>

Source: GTAA 2022

## Transit provision

- S17. In relation to transit provision, it is recommended that the local authorities set up a negotiated stopping places policy to address transit provision. 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. Agreements could be made with households residing on sites and 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.

## Conclusions

- S18. It is recommended that the local planning authority seeks to meet the PPTS (2015) need (as required) with 'ethnic' need covered by a criteria-based policy. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also able to demonstrate that how accommodation need for those who do not meet the PPTS (2015) definition are being addressed. The local authority could adopt the accommodation needs as determined by the PPTS (2015) definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the local authority would first meet the need of 35 pitches (10 within the first 5-years), but then meet the 'potential' need of a further 6 pitches (4 within the first 5 years). It is important to note that this only refers to Gypsies and Travellers and not Travelling Showpeople.
- S19. It is also recommended that Herefordshire Council incorporates into its Local Plan a criteria-based policy which takes into consideration any planning applications that might materialise over the plan period from households not considered by this assessment. This may be either because their existence was not known during the GTAA, or their accommodation needs arose after the GTAA was completed. This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified below and could be met through windfall applications.
- S20. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

### **Planning policy:**

- 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 sites and yards to determine how they could expand the number of pitches to meet families' accommodation needs.
- To consider alternative options for developing new sites and yards such as developing them on a cooperative basis, shared ownership, or small sites owned by a local authority but rented to families for their own use.

- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups), to review its current, historic and potential planning status, and review the most effective way forward.
- 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.
- 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, and Showpeople communities.
- 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:**

- 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 training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, and Showpeople.
- 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 in relation to Gypsy and Traveller, and Travelling Showpeople issues.
- During the ongoing implications of Covid-19 impacting the communities, determine help and support the local authorities and other services could provide to the households.

# 1. Introduction

## Study context

- 1.1 In April 2020 Herefordshire Council commissioned *Iceni Projects* to undertake a Housing Market Area Needs Assessment (HMNA) for the period 2020-2041. A key element of the HMNA is to determine the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Gypsy and Traveller Accommodation Assessment (GTAA) component of the HMNA was subcontracted to *RRR Consultancy Ltd*.
- 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). The results of the GTAA will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources.

## 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 2021) DLUHC Traveller Caravan Count to determine trends in the population of Gypsies and Travellers and analysis of unauthorised encampment data.
  - An online survey and telephone interviews with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Showpeople.
  - 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 map of the Herefordshire Council area shows the local authority area in the context of neighbouring authorities:

Figure 1.1 Herefordshire Council Area Map



Source: Herefordshire Council Core Strategy 2015

## Herefordshire

- 1.6 According to the [Council's Core Strategy](#) (2015)<sup>1</sup>, Herefordshire is a large, predominately rural, landlocked county situated in the south western corner of the West Midlands region, on the border with Wales. It has a close relationship with neighbouring Shropshire and Worcestershire and there are a range of interactions taking place which cross Herefordshire's boundaries in all directions, including service provision, transport links and commuting patterns. The estimated 2020 population of the county is 195,189 people (ONS 2020).
- 1.7 The county area covers 217,973 hectares. High hill ranges, including the Black Mountains, and Areas of Natural Beauty (AONB) such as Malvern Hills and the Wye Valley, encircle much of the county at its perimeter. Away from these areas, the landscape is one of gentle rolling hills, dissected by wide river valleys with lower-lying plains in the centre. River crossing points have provided a natural focus for the development of many settlements, with others dispersed across Herefordshire's rich and diverse landscape.
- 1.8 The meandering river valley landscape which is the county's principal geographical feature is that of the River Wye; which enters Herefordshire near the Welsh town of Hay-on-Wye, flowing east to Hereford before leaving the county at the Wye Gorge, downstream of Ross-on-Wye. In addition to significant parts of the county being drained by the Wye river system, the River Wye, together with its valley setting, is in part, an Area of Outstanding Natural Beauty and integral to Herefordshire's identity.
- 1.9 At the county's heart is the city of Hereford which is the main centre for civil and ecclesiastical administration, health, education and leisure facilities, shopping and employment. The five market towns of Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye surround the city with a regularity that harks back to medieval times. Outside these urban areas, nucleated villages and smaller settlements, farms and other isolated properties characterise much of Herefordshire.
- 1.10 Herefordshire plays a strategic role in facilitating cross boundary links between England and Wales. Whilst vehicle flows along these strategic routes are considered low in a national context, when coupled with local movement, congestion, journey time delays and air pollution they are problematic, notably within Hereford and Leominster. Car ownership and dependency in the county is high due to the lack of public transport in rural areas and the need to access services and employment from these areas.

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<sup>1</sup> Herefordshire Council Core Strategy 2011-2031 Adopted October 2015.

## Gypsies, Travellers, and Showpeople in the county

1.11 There has been a travelling community in Herefordshire for the last 500 years. Travellers live in different ways, including permanently 'on the road', in caravans or mobile homes, or in settled accommodation (for part or all of the year)<sup>2</sup>. In Herefordshire there are a number of small privately owned traveller sites and larger sites that are managed by Herefordshire Council. The private sites vary in size with small sites of 1-5 pitches typically being occupied by a single, extended family. There are 38 Gypsy and Traveller sites located within the local authority area – consisting of 45 pitches on 6 local authority sites, 44 pitches on 30 private sites, and 14 pitches located on 2 unauthorised developments. Some sites were partially or fully closed whilst refurbishment works took place, although all are now available for occupation. The local authority area also contains 4 Travelling Showpeople yards consisting of 10 plots.

### Definition Context

1.12 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.

1.13 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>.

1.14 The DCLG's '[Planning Policy for Traveller Sites](#)' (PPTS) (August 2015) defines Gypsies and Travellers as below:

*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*

<sup>2</sup> Travellers' Sites Development Plan Document (Adopted October 2019) p.2

<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.



*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.*

1.15 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>.

1.16 According to PPTS (2015) 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>*

1.17 Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAA), 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 PPTS (2015) (see above).

1.18 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

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<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.

living quarters, due to work, Travelling Showpeople require additional space in order to store and maintain large equipment.

## Summary

- 1.19 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, Planning Policy for Traveller Sites (PPTS) (2015) 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.
- 1.20 The purpose of this assessment is to quantify the accommodation needs of Gypsies and Travellers in the Herefordshire Council area between 2021 and 2041. 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 Local Plan.
- 1.21 To achieve the study aims, the research drew on several data sources: a review of secondary information; consultation with organisations involved with Gypsy, Traveller, and Showpeople, issues; and surveys of Gypsy, Traveller, and Showpeople households. These provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

## 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, Traveller, and Showpeople issues. It should be noted that although the DCLG draft guidance (March 2016) requires an assessment of houseboats' accommodation needs, there are no boat dwellers residing in the local authority area.
- 2.2 The intention is to 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, Travellers, and 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 Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. The PPTS (2015) 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 (2015). One important amendment relates to the change in the definitions of Gypsies, Travellers, and Travelling Showpeople. The PPTS (2015) changed the definition to exclude households who have permanently ceased to travel – in effect, for planning purposes, PPTS (2015) 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.

- 2.5 Whilst it is clear that the PPTS (2015) 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.
- 2.6 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 (2015) 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.
- 2.7 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 PPTS (2015) definition).
- 2.8 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 PPTS (2015) definition. 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 (2015) could fail, and the employment-based interpretation become more settled.
- 2.9 In the absence of caselaw on the current PPTS (2015) 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.

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<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.

- 2.10 Given the above, the GTAA methodology provides: first, a need figure based on ethnic identity; and second, a figure based on the PPTS (2015) definition.
- 2.11 Using this method 'future-proofs' the Accommodation Needs Assessment and ensures 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 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>**

- 2.12 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).
- 2.13 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.
- 2.14 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

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

- movement between bricks-and-mortar housing and caravans or houseboats
- their presence on unauthorised encampments or developments.

2.15 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

2.16 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](#)

2.17 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**

### **Policy H4 – ‘Traveller sites’**

2.18 Policy H4 of the Core Strategy (2011-2031) states that the accommodation needs of travellers will be provided for through the preparation of a Travellers’ Sites Document (DPD) which will include site specific allocations. In the absence of an adopted DPD, or where proposals for sites are brought forward on non-allocated land, proposals will be supported where:

1. sites afford reasonable access to services and facilities, including health and schools
2. appropriate screening and landscaping is included within the proposal to protect local amenity and the environment
3. they promote peaceful and integrated co-existence between the site and the local community
4. they enable mixed business and residential accommodation (providing for the live-work lifestyle of travellers)

5. they avoid undue pressure on local infrastructure and services
6. in rural areas, the size of the site does not dominate nearby settled communities and
7. they are capable of accommodating on-site facilities that meet best practice for modern traveller site requirements, including play areas, storage, provision for recycling and waste management.

2.19 In rural areas, where there is a case of local need for an affordable traveller site, but criterion 1 above cannot be fulfilled, then an exception may be made and proposals permitted, provided such sites can be retained for that purpose in perpetuity.

### **Travellers' Sites Development Plan Document (Adopted October 2019)**

2.20 This DPD provides for a five-year supply of pitches for those travellers that meet the definition as set out in PPTS (2015). It confirms that the Core Strategy update will consider the longer-term unmet needs of those meeting the definition within the Planning Policy for Traveller Sites (August 2015) as well the needs of Travellers outside of the definition.

2.21 Policy TS1 'Residential Traveller Pitches and Sites' states that proposals for new residential Traveller pitches and sites will be supported where they conform to Policy H4 of the Core Strategy and achieve the following:

1. an overall good quality of design which respects the setting of the site and the local landscape character.
2. a good quality of build of amenity blocks, where included, to provide a decent standard for washing and cooking facilities.
3. amenity blocks, where included, should be sensitively designed and sited using appropriate materials for the area.
4. any biodiversity assets and designated and undesignated heritage assets are conserved and where appropriate enhanced. Any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or heritage assets should be satisfactorily mitigated.
5. a suitable landscaping scheme where the site boundary treatment reflects local character, local materials and local colour and should be a small-scale structure/fence. The use of native trees, hedgerows and shrubs to form boundaries will be encouraged as an alternative to high close board fencing.
6. existing trees and hedgerows which are important to amenity should be retained. Any trees and hedgerows lost should be replaced by native trees and hedgerows in appropriate areas of the site.
7. a safe area for children to play is included in the site layout where required.
8. safe and convenient access to the highway network for cars, pedestrians and vehicles and turning space within the site.
9. suitable arrangements for clean water supply, foul sewerage disposal and surface water drainage, and where opportunities for Sustainable Drainage Systems are maximised.

10. any commercial activity that is proposed on the site is of a type that is appropriate to the location and does not result in an adverse impact on the amenity of any local residents or other land users.
11. external lighting is kept to a minimum and should be directed down to the ground, to avoid light pollution.

2.22 Further, Policy TS2 'Travelling Showpeople plots' states that proposals for new plots for Travelling Showpeople will be supported where they conform to Policy H4 of the Core Strategy and achieve the following:

1. The site should be able to accommodate residential accommodation as well as space and or buildings for storage and maintenance of equipment if required.
2. The site should have satisfactory vehicular access, suitable for the safe and convenient movement into and out of the site of large vehicles including those carrying fairground equipment.
3. The site should be in reasonable proximity to the strategic road network.
4. Suitable arrangements for clean water supply, foul sewerage disposal and surface water drainage should be included in the design and opportunities for sustainable drainage systems area maximised.
5. The commercial activity of the site should not impact on the amenity of local residents or other land users. Planning conditions may be considered to reduce any impact from noise on nearby residential
6. An overall good quality of design which respects the setting of the site and the local landscape character, the character and significance of designated and undesignated heritage assets and minimises any impacts on biodiversity assets.
7. The site boundary treatment reflects local character, local materials and local colour. The use of native trees, hedgerows and shrubs to form boundaries will be encouraged.
8. Existing trees and hedgerows which are important to amenity should be retained. Any trees and hedgerows lost should be replaced by native trees and hedgerows in appropriate areas of the site.
9. Where required, a safe area for children to play should be incorporated into the design.
10. External lighting should be kept to a minimum and should be directed down to the ground, to avoid light pollution.

2.23 The Travellers' Sites Development Plan Document (2019) also lists site allocations at the following locations:

1. Romany Way, Grafton: 1 additional residential pitch within existing boundaries of the site.
2. Orchard Caravan Park Watery Lane Lower Bullingham: 2 additional residential pitches as an extension to the existing site.



3. Openfields Caravan Site, Bromyard: 2 additional pitches within the existing site boundary.
4. Pembridge Caravan Site: Proposed allocation of 4 additional residential pitches.
5. Oakfields, Nashend Lane, Bosbury: allocation of 4 additional pitches.

### **Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update 2017**

2.24 The GTAA update was based on interviews with 69 Gypsy and Traveller households living within the study area as well as incorporating results from interviews with Gypsies and Travellers, and Travelling Showpeople, undertaken as part of the previous 2014 study. The GTAA update found a need for 74 additional pitches up to 2032 using a cultural definition, and 27 pitches using the PPTS (2015) definition. The GTAA also identified a need for 9 additional Travelling Showpeople plots during the period 2017 to 2032. According to the GTAA update during the period 2014-2016 124 unauthorised encampments were recorded in the study area. In response, it recommends 5 transit pitches capable of accommodating up to 10 caravans.

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

- 2.25 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.
- 2.26 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.
- 2.27 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.
- 2.28 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 GTAA's recently undertaken by neighbouring and nearby local authorities specifically in relation to accommodation need and travelling patterns.

### **Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA) 2017**

- 2.29 The GTAA was undertaken on behalf of six local authorities – Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council, and Tewkesbury Borough Council. For the period 2016-2031 the GTAA identifies a need of 14 additional pitches for households who meet the ‘work’ interpretation of PPTS (2015), 61 additional pitches for the accommodation needs of households who do not meet the ‘work’ interpretation of PPTS (2015), and up to 78 additional pitches for households whose work status is unknown. The GTAA also identifies a need for 38 additional Travelling Showpeople plots for households who meet the ‘work’ interpretation of PPTS (2015), and up to 14 additional plots for households whose work status is unknown. In relation to transit provision the GTAA recommends that levels of unauthorised encampments are monitored over a 3-year period to determine if transit provision is required, and to consider implementing a negotiated stopping policy or temporary stopping places policy in the meantime.

### **Monmouthshire GTAA 2016**

- 2.30 The Monmouthshire GTAA assessed the accommodation needs of Gypsies, Travellers, and Travelling Showpeople for the period 2016-2021. The GTAA found that there is an estimated unmet need for 8 Gypsy and Traveller pitches to 2021, based on overcrowding, unauthorised occupation and the likelihood of cultural aversion to conventional housing. It found no need for a Travelling Showpeople yard in the local authority area. In relation to transit provision, Monmouthshire has two privately owned sites, although the GTAA did not find a need for additional transit provision due to the low number of unauthorised encampments in the County, although it did find a need for stopping places.

### **Powys GTAA 2016**

- 2.31 According to the GTAA the estimated additional pitch provision needed for Gypsies and Travellers in Powys for the first 5 years of the Local Plan period is for 5 additional pitches, and need for the remainder of the Local Plan period (to 2026) is for a further 2 additional pitches giving a total need for the whole Local Plan period for 7 additional pitches. No Travelling Showpeople yards were identified in Powys. The GTAA recommended that there is not a need for the Council to provide a transit site in Powys due to the low numbers of unauthorised encampments. However, it suggests that the Council should continue to monitor the number of unauthorised encampments and consider the use of short-term toleration, negotiated stopping arrangements or temporary stopping places to deal with short-term transient stops.

### **Shropshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2017**

- 2.32 The GTAA was based on Interviews with 96 Gypsy and Traveller households living on sites or in bricks and mortar accommodation in the County. The GTTA found a need for 90 additional pitches up to 2035 using a cultural definition, and 34 pitches using the PPTS (2015)

definition. The GTAA did not find any need for additional Travelling Showpeople plots. In terms of transit provision, the GTAA 2017 recommends that a transit site of 8-10 pitches is developed. This would accommodate around 90% of unauthorised encampments at current levels.

### **South Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) 2019**

- 2.33 The GTAA was undertaken by *RRR consultancy Ltd* on behalf of Malvern Hills District Council, Worcester City Council, and Wychavon District Council. It determines accommodation needs for Gypsies, Travellers and Travelling Showpeople over the period 2019-2041. The GTAA found a need for 167 additional Gypsy and Traveller pitches for ethnically identified Gypsies and Travellers over the period 2019-41, 104 additional pitches for households who meet the PPTS (2015) definition, and 71 additional pitches for households who meet the 'travel to work' definition. It also found a need for 10 additional Travelling Showpeople plots over the period 2019-2041. In relation to transit provision, this GTAA recommends that the local authorities continue with the Worcestershire negotiated stopping policy which involves caravans being sited on suitable land for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets.

## **Summary**

- 2.34 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.
- 2.35 Core Strategy Policy H4 'Traveller sites' outlines criteria for determining the allocation of new Gypsy, Traveller and Travelling Showpeople pitches and plots. Policies TS1 and TS2 of the Travellers' Sites Development Plan Document (Adopted October 2019) further details the criteria for determining the locations of Gypsy and Traveller sites and pitches and Travelling Showpeople yard and plots respectively where they conform to Policy H4 of the Core Strategy. The Development Plan Document (2019) also lists site allocations at 5 suitable locations within the county.
- 2.36 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.

## 3. Trends in the population levels

### Introduction

- 3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the DLUHC 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 DLUHC 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 accommodation 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 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 (tourer and static caravans) and so Gypsies and Travellers residing 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 a useful indicator 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 DLUHC Count includes data concerning both Gypsies and Travellers sites<sup>11</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 2021.

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<sup>11</sup>. Data regarding Travelling Showpeople are published separately by the DLUHC as 'experimental statistics'.

## Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people<sup>12</sup>. 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 now residing in bricks and mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing 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 DLUHC. Due to Covid-19 restrictions the Count did not take place in July 2020 or January 2021. The [July 2021 Count](#) (the most recent figures available) indicate a total of 24,203 caravans. Applying an assumed three person per caravan<sup>13</sup> multiplier would give a population of 72,609 persons.
- 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>14</sup> gives a total population of 145,218 persons for England. However, given the limitations of the data this figure can only be very approximate, and may 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. Table 3.1 below shows total population and Gypsy and Traveller population in Herefordshire and neighbouring counties as derived from the 2011 Census. It shows that in 2011 there were 183 Gypsies and Travellers residing in the Herefordshire Council area representing around 0.09% of the usual population<sup>15</sup>. This is higher than the average for England of 0.04%. The proportion of Gypsies and Travellers recorded in the four counties varied widely with 0.06% of the population of Shropshire recorded as Gypsies or Travellers compared with 0.07% in Gloucestershire, and 0.12% in Worcestershire. Worcestershire also recorded the largest population with 699 Gypsies and Travellers recorded by the 2011 Census<sup>16</sup>.

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<sup>12</sup> House of Commons 'Tackling inequalities faced by Gypsy, Roma and Traveller communities' April 2019 located at: [www.parliament.uk](http://www.parliament.uk)

<sup>13</sup> Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

<sup>14</sup> Ibid.

<sup>15</sup> See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

<sup>16</sup> The Office for National Statistics (ONS) are due to publish preliminary results of the 2021 Census early summer 2022.

Table 3.1 Gypsy and Traveller Population			
	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Herefordshire	195,189	183	0.09%
Gloucestershire	644,882	441	0.07%
Shropshire	326,692	181	0.06%
Worcestershire	601,103	699	0.12%
Total	1,767,865	1,504	0.09%

Source: NOMIS 2020

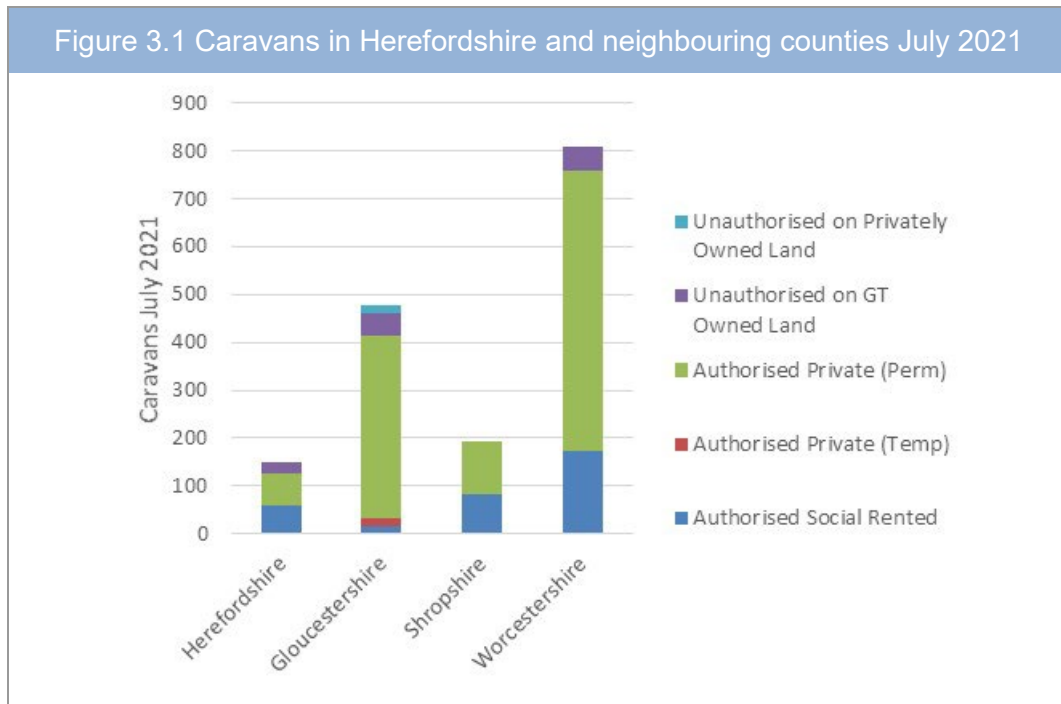
- 3.10 It is also possible to determine the Gypsy and Traveller population within the four counties area. Derived from 2011 Census data, Table 3.2 shows the tenure of 1,300 Gypsy and Traveller households. Specifically in relation to Herefordshire, a total of 125 households were recorded with over three fifths (62%) residing in social rented accommodation compared to just over a quarter (26%) who own the accommodation they occupy, and around an eighth (13%) who rent privately. The proportions of tenure vary throughout the 4 counties with the highest proportion of owned accommodation occurring in Worcestershire (55% compared to an average of 46%), the highest proportion of social rented accommodation occurring in Herefordshire (62% compared to an average of 28%), and the highest proportion of private rented accommodation also occurring in Worcestershire (31% compared to an average of 25%).

Table 3.2 Gypsy and Traveller Population by tenure								
	Owned		Social rented		Private rented		Total	
	No.	%	No.	%	No.	%	No.	%
Herefordshire	32	26%	77	62%	16	13%	125	100%
Gloucestershire	112	42%	102	38%	51	19%	265	100%
Shropshire	34	26%	77	59%	19	15%	130	100%
Worcestershire	426	55%	112	14%	242	31%	780	100%
Total	604	46%	368	28%	328	25%	1,300	100%

Source: NOMIS 2020

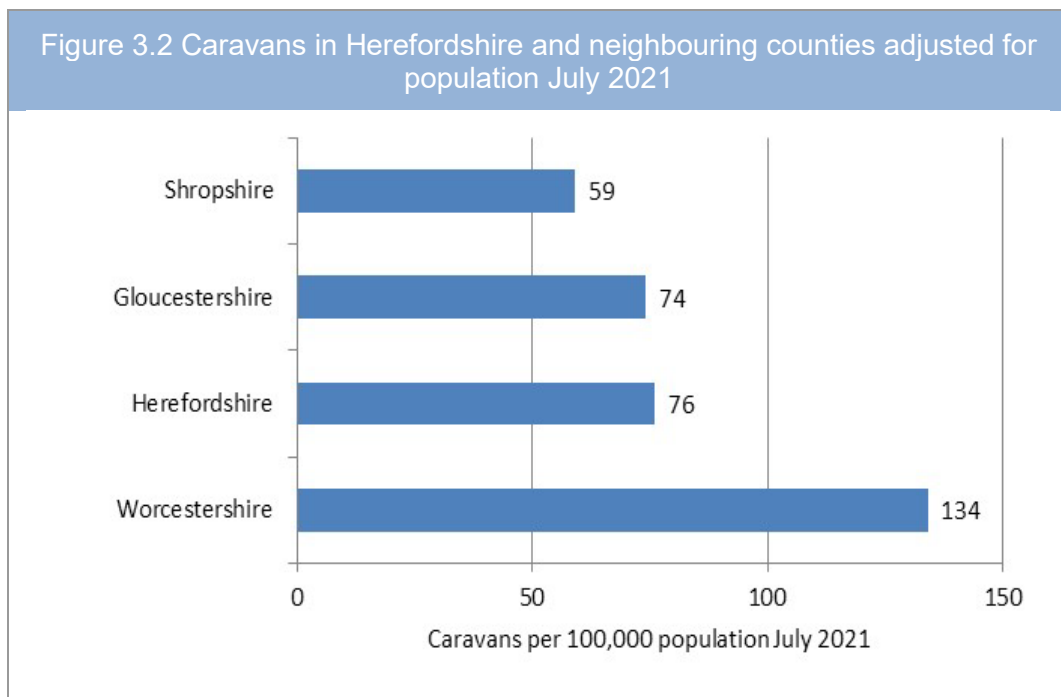
- 3.11 Figure 3.1 shows Herefordshire's Traveller July 2021 Caravan Count in the context of neighbouring counties<sup>17</sup>. There is some variation in the number of caravans with 148 caravans recorded in Herefordshire, 193 caravans recorded in Shropshire, 479 caravans recorded in Gloucestershire, and 808 caravans recorded in Worcestershire. The total of 1,628 caravans across the 4 counties included 136 located on unauthorised pitches (21 in Herefordshire). Of the 148 caravans in Herefordshire recorded by the July 2021 Count over two fifths were recorded on either private sites (45%) or socially rented sites (41%), and the remainder (14%) on unauthorised pitches.

<sup>17</sup> Please note that the Welsh Gypsy and Traveller Caravan Count does not collect the same information as the DLUHC Caravan Count, so it is not possible to compare Herefordshire with neighbouring Welsh local authority areas.



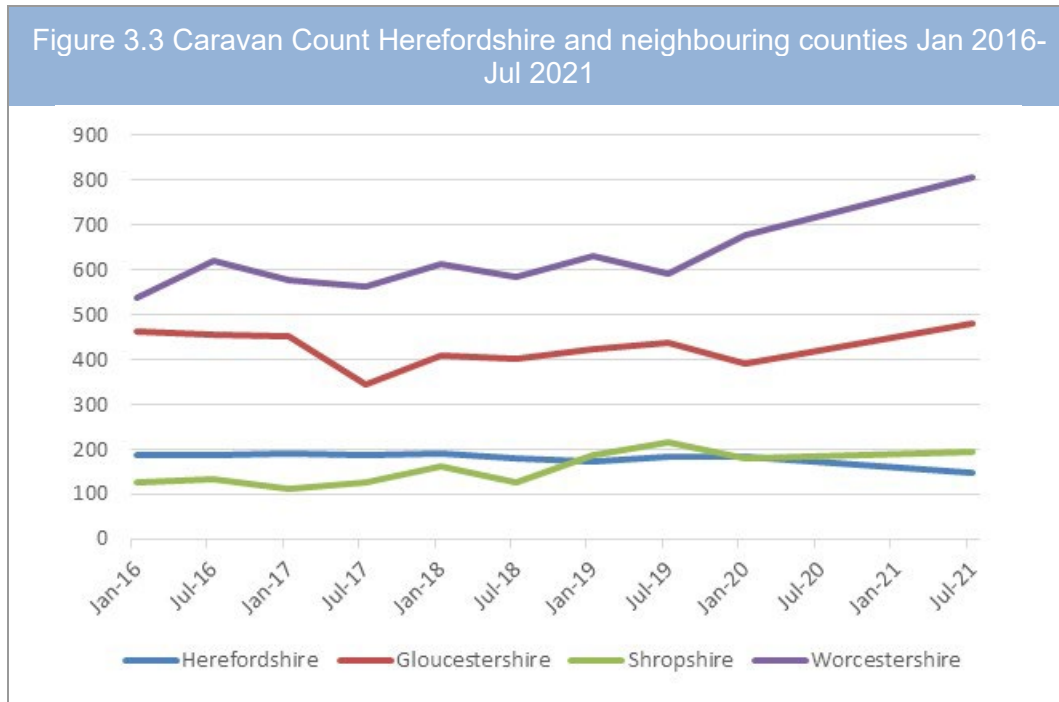
Source: DLUHC July 2021 Traveller Caravan Count

3.12 Figure 3.2 shows that when the population is taken into account the density of caravans varies. The proportion in Herefordshire is 76 caravans per 100,000 population compared to Shropshire (59 caravans per 100,000 population), Gloucestershire (74 caravans per 100,000 population), and Worcestershire (134 caravans per 100,000 population).



Source: DLUHC July 2021 Traveller Caravan Count

3.13 Figure 3.3 shows that the total number of caravans recorded in the in the context of Herefordshire and neighbouring counties between January 2016 and July 2021<sup>18</sup>. The number of caravans in Herefordshire has remained fairly constant over the 4-year period averaging 181 caravans per Count. This is higher than the average Count for Shropshire (average 157 caravans per Count), but lower when compared with Gloucestershire (average 426 caravans per Count), and Worcestershire (average 621 caravans per Count).

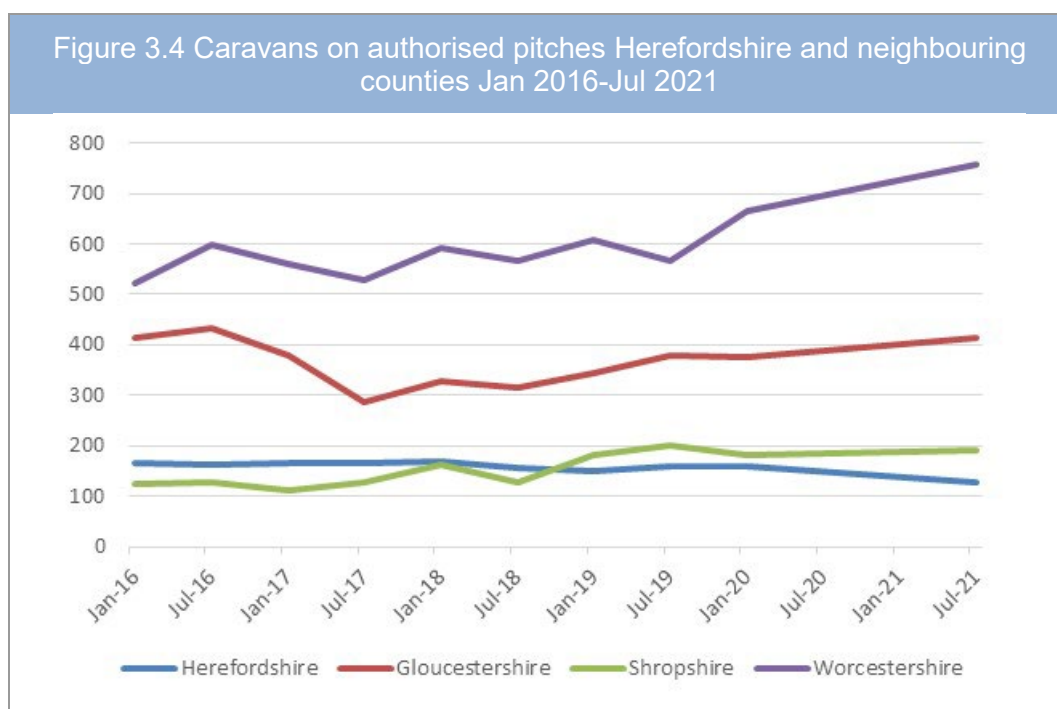


Source: DLUHC July 2021 Traveller Caravan Count

3.14 Similarly, the number of caravans located on authorised pitches in Herefordshire remained steady between January 2016 to July 2021 with an average of 158 caravans per Count (Figure 3.4). Again, this is higher than the average Count for Shropshire (average 154 caravans per Count), but lower when compared with Gloucestershire (average 367 caravans per Count), and Worcestershire (average 596 caravans per Count).

<sup>18</sup> These are the periods included in the DLUHC July 2021 Traveller Count.

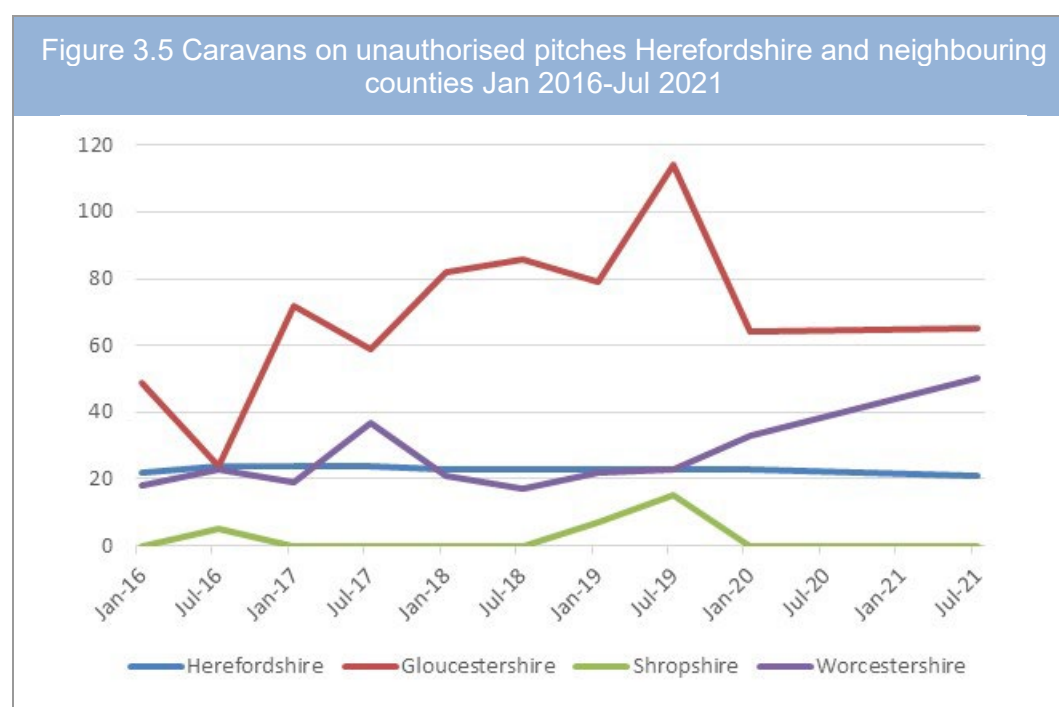




Source: DLUHC July 2021 Traveller Caravan Count

## Data on unauthorised encampments

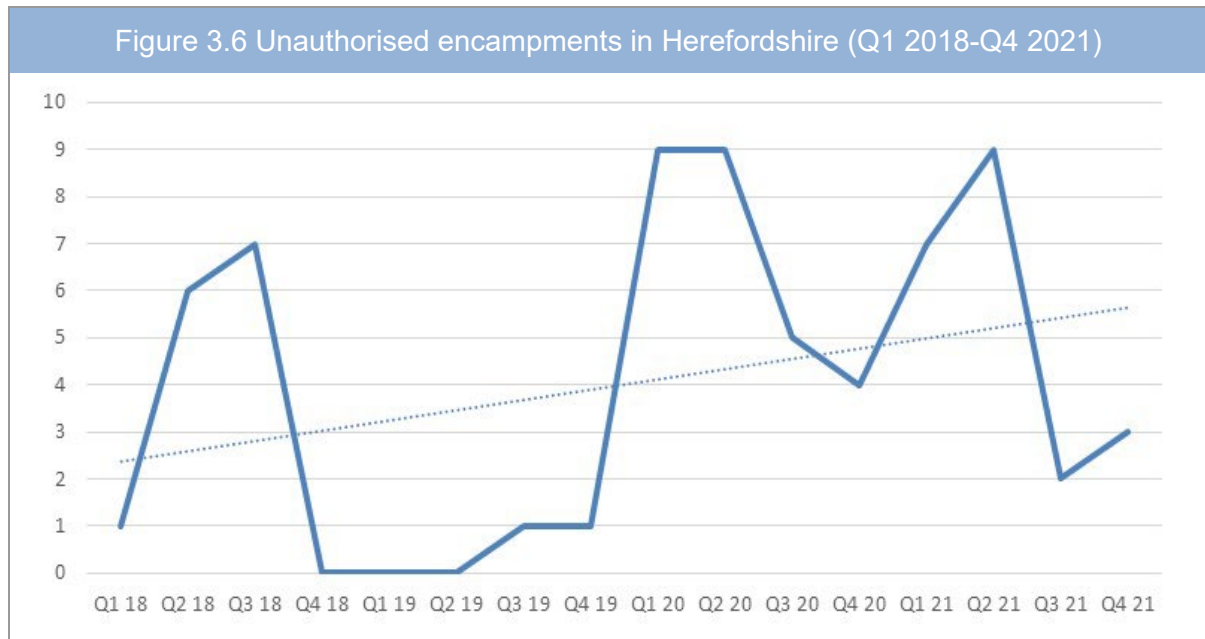
3.15 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'sites' without planning permission) is of limited accuracy, although it may indicate general trends. Figure 3.5 shows that the number of caravans recorded on unauthorised pitches in Herefordshire remained steady averaging 23 caravans per Count. The number of unauthorised encampments in neighbouring counties remained fairly steady with the exception of Gloucestershire which has varied considerably per Count. On average, around a fifth (19%) of unauthorised encampments recorded by the DLUHC Count occurred in Herefordshire, compared with only a small proportion (2%) in Shropshire, just over a fifth (22%) in Worcestershire, and almost three fifths (57%) in Gloucestershire.



Source: DLUHC July 2021 Traveller Caravan Count

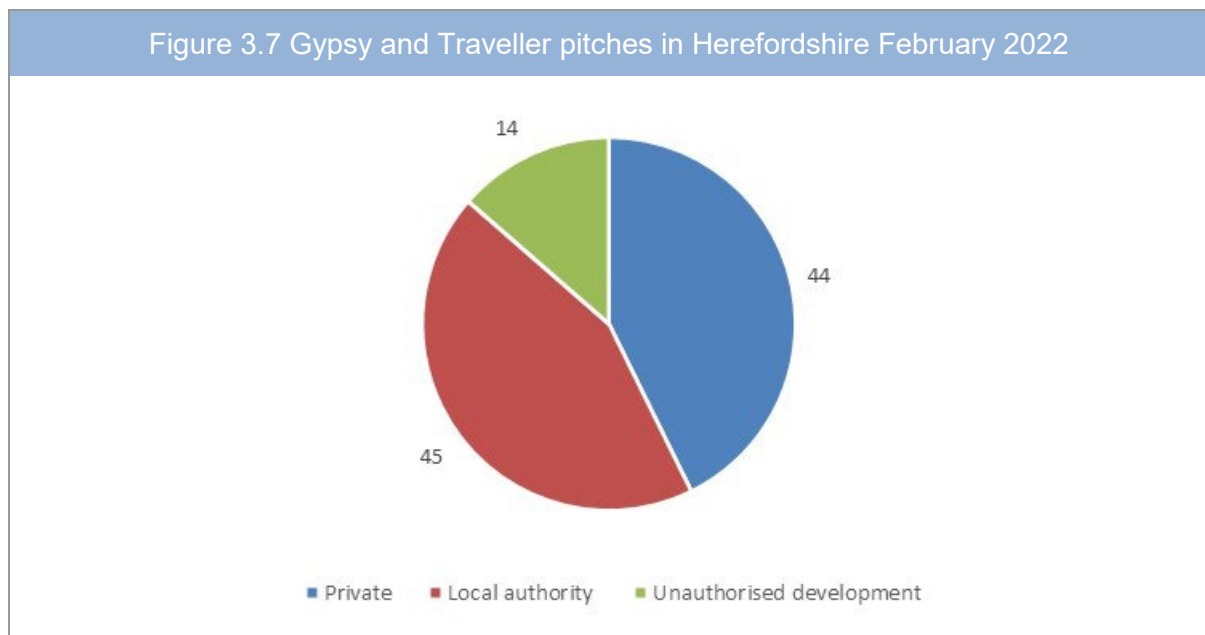
## Local authority data on unauthorised encampments

- 3.16 As previously noted, the DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'sites' without planning permission) is of limited accuracy, although it may indicate general trends. Herefordshire Council keeps more detailed records of unauthorised encampments.
- 3.17 Figure 3.6 shows the number of unauthorised caravans in the county recorded by Herefordshire Council over the period January 2018 to January 2022. It shows that 67 unauthorised encampments took place with a peak of 14 in the period July to September 2017, before declining to 3 in the period January to March 2022 (with none taking place in Q4 2017, Q4 2018, Q1 2019, and Q2 2019). However, it is likely that restrictions due to Covid-19 may have impacted on travelling patterns from March 2020 onwards.
- 3.18 The dotted trend line shows that, on average, the number of unauthorised encampments has steadily increased over the 4-year period. On average, each unauthorised encampment consisted of 4 vehicles and lasted 25 days. Just over a fifth (22%) of unauthorised encampments took place in Hereford, a sixth (16%) in Leominster, a sixth (16%) in various locations around the county, just over a tenth in Ross-on-Wye (11%) and Ledbury (11%). Smaller proportions were found in Luston (9%), Pembridge (6%), Bosbury (5%), and Bromyard (5%). The type of location on which the unauthorised encampments took place varied widely although they tended to occur on public spaces such as car parks or on verges.



## Residential pitches within the county

3.19 According to Herefordshire Council data, there are 38 Gypsy and Traveller sites located within the local authority area – consisting of 57 pitches on 6 local authority sites (although in April 2022 42 were occupied and 14 pitches on 3 local authority sites were closed for refurbishment and 1 was vacant), 44 pitches on 30 private sites, and 14 pitches located on 2 unauthorised developments.



## Travelling Showpeople

- 3.20 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. For clarity, we refer to Travelling Showpeople 'plots' rather than 'pitches', and 'yards' rather than 'sites' to recognise the differences in design. It should consequently be borne in mind that the amount of land needed to live on is greater than for Gypsies and Travellers. The local authority area contains 4 Travelling Showpeople yards consisting of 10 plots.

## Summary

- 3.21 The 2011 Census suggests there were 183 Gypsies and Travellers residing in Herefordshire representing about 0.09% of the total population. The 2011 Census also records a total of 125 Gypsy and Traveller households residing within the county of which the majority were residing in social rented accommodation. The MHCLG January 2020 Caravan Count shows there were 183 Gypsy and Traveller caravans located in Herefordshire. When population size is considered the proportion in Herefordshire is 76 caravans per 100,000 population compared to Shropshire (59 caravans per 100,000 population), Gloucestershire (74 caravans per 100,000 population), and Worcestershire (134 caravans per 100,000 population).
- 3.22 Herefordshire Council collects extensive data on unauthorised encampments taking place throughout the county. Between January 2018 to January 2022 67 unauthorised encampments took place in the county with a peak of 14 in the period July to September 2017, before declining to 3 in the period January to March 2022. The number of unauthorised encampments has steadily increased throughout the 4-year period. However, it is likely that restrictions due to Covid-19 may have impacted on travelling patterns from March 2020 onwards. On average, each unauthorised encampment consisted of 4 vehicles and lasted 25 days. Unauthorised encampments took place in various locations around the county but most commonly took place in Hereford, Leominster, and Ross-on-Wye.
- 3.23 There are 38 Gypsy and Traveller sites located within the local authority area – consisting of 45 pitches on 6 local authority sites (although in April 2022 12 pitches on 2 local authority sites were closed for refurbishment), 44 pitches on 30 private sites, and 14 pitches located on 2 unauthorised developments. There are also 4 Travelling Showpeople yards consisting of 10 plots.

## 4. Stakeholder Consultation

### Introduction

- 4.1 Consultation with a range of stakeholders was conducted between May and August 2020 to provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers, and Showpeople. 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 county.
- 4.2 Due to Covid-19 restrictions the consultation took the form of an online survey and telephone interviews. In recognition that issues concerning these communities transcend geographical boundaries, and the duty to cooperate in addressing the needs of these communities, consultation was undertaken with stakeholders from within Herefordshire and neighbouring authorities. Stakeholders commented on how important it is for them to be consulted and given the opportunity to participate. This chapter provides insight gathered from consultation with key stakeholders within the county and neighbouring authorities including Powys, Shropshire, Monmouthshire, Malvern Hills (Worcestershire), and Forest of Dean (Gloucestershire).
- 4.3 Stakeholders involved in the consultation included: local authority officers with responsibility for Gypsy, Traveller, and Showpeople issues, planning and planning policy officers, housing strategy officers, enforcement officers, housing officers, education service officers, police, fire and rescue services, health services, planning agents, National Federation of Gypsy Liaison Groups, and local and national representatives of the Showmen's Guild of Great Britain.
- 4.4 Themes included: the need for additional provisions and facilities; travelling patterns; planning process, the availability of land; accessing services; and work taking place to meet the needs of the different community groups. This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised. Please note that some stakeholder comments relate to neighbouring local authorities rather than Herefordshire.

### Accommodation needs

- 4.5 Stakeholders generally agreed that there is a lack of accommodation provision across the county and surrounding authorities. It was acknowledged that there is a long history of Gypsies, Travellers and Showpeople in the county. One spoke of how there are large numbers of Travellers in Herefordshire due to the historic farm work available in the 1970s and 80s.

- 4.6 It was suggested that there are not enough permanent pitches for Gypsies and Travellers, and plots for Showpeople in the county. Stakeholders commented on how a lack of provision has led to overcrowded pitches and plots, unauthorised encampments and developments, or households having to reside in bricks and mortar accommodation. Some households residing in bricks and mortar accommodation are struggling and would prefer to return to residing in trailers.
- 4.7 Stakeholders from both within and outside the county were not certain about the level of accommodation need in local areas. In relation to Gypsies and Travellers, it was stated that there is a lack of both private and public sites, and that the poor management of some sites is leading to difficulties for site residents. However, it was noted by a Herefordshire Council stakeholder that incidents of fly tipping and vandalism had made it difficult to manage sites. Also, site refurbishment is currently (April 2022) taking place in relation to 12 pitches on 2 local authority sites. It was commented on how private family sites tend to be well maintained and households residing on them integrate well into the local community.
- 4.8 A representative from the Showmen's Guild stated that for many years they have expressed concern about a lack of provision in local areas. Consequently, yards are full, and families are struggling to find new places. Another stakeholder stated that there is a lack available plots and that "no new sites for Travelling Showpeople have been developed for many years making it difficult to find sites that are suitable for this purpose".
- 4.9 Stakeholders emphasised that small family sites and yards were the most favoured form of provision and tend to be of a higher standard compared to larger sites. They stated that it is preferable for separate provision for Romany Gypsies, Travellers, and Showpeople. However, it was acknowledged that this meant that the accommodation needs of some families may not be met if their ethnic identity differed from families already occupying a particular site. However, not all households are able to develop sites or yards and there remains a need for private rented and social rented accommodation.

## **Barriers to Accommodation Provision**

- 4.10 Key barriers to new accommodation provision in the study area and neighbouring authorities noted by stakeholders included: public and political opposition to new sites; a lack of suitable land; the high cost of suitable land; Government cuts to local services; lack of interest from landowners to developing new sites; existing pitches with temporary planning permission; getting planning permission; different local authorities applying different planning guidance in relation to the development of new provision. According to a stakeholder from a neighbouring authority, the main barrier is the lack of sites being submitted (either in planning applications or in local authority calls for sites) in appropriate locations.
- 4.11 Stakeholders commented in how local and national guidance can be a key barrier. A stakeholder from a neighbouring authority commented on how given that proposed sites are

assessed against national and local planning criteria "...most sites submitted for consideration in the district do not meet the essential planning criteria". This was a key issue for all of the local authorities including a neighbouring Welsh authority: "...finding suitable and available of land in line with Welsh Government guidance is a key issue".

- 4.12 Stakeholders commented on how local authority 'calls for sites' frequently lead to few potential sites being put forward by the private sector. Also, it can be difficult to gain public acceptance of proposals for new sites or yards. Landowners may be reluctant to offer land for development as new sites or yards if alternative uses are regarded as more profitable. It was suggested that incentives may help increase the amount of land being put forward.
- 4.13 Stakeholders suggested that allocating land for the development of new sites or yards assures the Gypsy, Traveller and Showpeople communities that accommodation needs would be met. According to one stakeholder, it is important for all communities to have suitable accommodation i.e. accommodation that both offers essential services and also enables them to maintain their way of life.
- 4.14 Difficulty in identifying suitable land and affordability were cited as key barriers to the provision of new sites, and yards. It was suggested that there being too few permanent sites or yards is mainly due to a lack of suitable land and limited funding for the development and maintenance of new provision. The process of identifying suitable land was also deemed problematic.
- 4.15 It was suggested that local authorities should ensure that Local Plans make it clear how the requirement for new pitches will be met. Also, local authorities should work closely with the development industry, Registered Providers, and landowners to explore opportunities for new sites. It was also suggested that all new local developments should include provision for the Gypsy and Traveller community. Some local authorities may have land suitable for development.
- 4.16 According to a representative from the Showmen's Guild it is difficult to find and purchase land suitable for development. Stakeholders noted that affordable land is usually located in unsuitable areas such as green belts or flood risk areas (although no green belts exist in Herefordshire), or already allocated for housing development. Green belt constraints and the desire to utilise brownfield sites are regarded as key issues for the selection of new sites or yards. A key criterion mentioned by stakeholders was that new provision should not be located too far away from existing communities.
- 4.17 A key barrier to new provision mentioned by stakeholders is discriminatory attitudes towards the travelling communities. In response, it was suggested that is important to determine policy responses in order to manage conflict that may arise from the development of new provision. This will require planning departments to work in liaison with other local authority departments and agencies. According to one stakeholder all proposals for new sites tend to be controversial although they are small compared to most housing developments. Another

stakeholder suggested it would be useful to work more closely with the Gypsy and Traveller community to encourage them to bring forward suitable sites.

## Transit provision and travelling patterns

- 4.18 Stakeholders stated that travelling patterns vary dependent on the type of community. Showpeople were regarded as travelling for work rather than cultural needs, leisure or pleasure, and tend to only stop on the pre-arranged fair or circus venue. In contrast Gypsies, and Travellers were regarded by stakeholders as being communities for whom travelling is an important element of their identity. According to one of the stakeholders

The travelling community that move through Herefordshire require a site for the short term. There are permanent sites across the county but no short-term facility.

- 4.19 Stakeholders commented on how travelling was usually seasonal and cited the main reasons for travelling as: to be close to friends and family; for employment reasons; for holidays; to attend funerals and weddings; and for cultural reasons i.e. to reinforce cultural identity. The apparent lack of transit provision was regarded as not only impacting on where Travellers can legitimately stop, but also limiting powers available to local authorities and the police to move unauthorised encampments which gives the impression of a lack of enforcement. According to stakeholders, there is a need for short-term provision with utilities and waste provision:

The lack of a short-term site means that travellers moving across the county will set up in car parks or other similar locations that then have a more significant impact on the local community due to fires being lit, build-up of rubbish, noise related issues etc.

- 4.20 It was suggested that events such as funerals of Gypsy and Traveller community leaders can lead to large unauthorised encampments. Stakeholders agreed that it can be difficult to determine travelling routes although it was acknowledged that these transcend local authority boundaries. Stakeholders commented how changes to planning legislation and guidance has impacted on the accommodation needs of the different travelling communities. Generally, stakeholders did not know or believe that the revised PPTS (2015) definition had impacted on travelling patterns. However, one stakeholder stated that it had: "...led to a great deal of complication and confusion with the result that studies have not been able to provide a realistic picture of need".
- 4.21 Key issues regarding Gypsy and Traveller transit provision included a lack of funding, absence of suitable or available land, and concerns regarding the management and illicit use of transit sites. According to one stakeholder:



I feel that a short-term site needs to be identified. This should be higher up on the council's agenda. It doesn't feel like a priority.

- 4.22 Stakeholders across the study area and neighbouring authorities commented on how Gypsies and Travellers do not always want to use transit sites or for them to be located close to permanent sites. It was suggested that any new transit provision should be located “away from railway line, main roads waste tips, somewhere they can feel valued and near towns they can access services and employment”.
- 4.23 The main travel routes noted by stakeholders included along the M4 corridor, the A40 into Wales, and routes to horse fairs at Stow, Cotswolds, and Appleby, Cumbria. Stakeholders suggested that Gypsies and Travellers are more likely to travel during the summer months leading to more unauthorised encampments.
- 4.24 According to a Welsh stakeholder Gypsy and Traveller households travel mainly to Oxford or London and sometimes to Ireland. However, most households pass through the county with increased numbers attending the Royal Welsh Show which usually takes place in July (although cancelled in 2020 and 2021). They stated that unauthorised encampments are more likely to occur in north Powys. One stakeholder stated that government policies have made it more difficult for Gypsies and Travellers to travel except for work purposes.

## Access to health and education services

- 4.25 There was general acknowledgement by stakeholders that it can be difficult for Gypsies and Travellers to access health and education services. There may be individuals in the Gypsy and Traveller community with specific health needs and is important that children access schools. It was suggested that there are large health inequalities in the Gypsy and Traveller community with life expectancy around 10 years lower compared with the settled community. This leads to a “whole range of health inequalities that you expect to see from an under-served group”. However, there has not been a health service which specifically supports the Gypsy and Traveller community in Herefordshire for over 10 years. It was noted that attendance of Gypsy and Traveller children at school remains poor and that reading and writing skills tend to be below average.
- 4.26 In response, Herefordshire Council provides a holistic education support service for Gypsy, Roma, and Traveller (GRT) families<sup>19</sup>. The Traveller Education team consists of 2 part-time workers and sits within the Herefordshire ‘Virtual School for looked after children’<sup>20</sup>. Its main focus is to work with GRT families to encourage access and inclusion, and to remove barriers to, education. GRT education support staff advocate on the families’ behalf and support them

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<sup>19</sup> See: <https://www.herefordshire.gov.uk/community-1/gypsy-roma-traveller-grt-families/2>

<sup>20</sup> See: <https://www.herefordshire.gov.uk/support-schools-settings/herefordshire-virtual-school-looked-children>

in relation to issues such as special educational needs (SEN), attendance, exclusions, school transport, admissions, employment, grants, housing, debt, and social care. These staff spend considerable time building positive professional relationships with GRT families to improve educational outcomes. They are a trusted link helping families to engage with other support services.

## Relationship between the communities

4.27 Stakeholders suggested that the propensity for the Travelling community to 'keep themselves to themselves' leads to suspicion amongst the settled community. All stakeholders agreed that there are clear divisions between Gypsies, Travellers and the settled community, and less of a division between the settled community and Showpeople. They commented on the need to change the behaviour and attitude of people contributing towards these divisions. They also agreed that divisions were often heightened during the process of planning applications. According to one stakeholder, "the more communities are separated the greater the divide becomes". Another stated that "poor tolerance from the settled community is due to the press and the few badly behaved travellers that set a bad example of the GRT community".

4.28 Other suggestions as to how to improve relations between the various communities included:

- Having a Gypsy and Traveller community representative on the Herefordshire Independent Advisory Group (IAG)<sup>21</sup>.
- Use the Safer Neighbourhood Policing Teams to help build better relationships.
- Promote a better understanding of the Gypsy and Traveller culture including studying the Gypsy, Traveller and Showpeople community as part of the national curriculum.
- Challenging cultural stereotypes.
- Using grassroots community work to build trust between the communities.
- Better information-sharing between departments and agencies.
- Improved site design and layout to aid effective management.
- Continue to encourage Gypsy and Traveller children to attend school and provide educational support.

## Communication

4.29 It was acknowledged that accommodation need transcends local authority boundaries. As such, it was suggested that this requires a 'joined up' response to accommodation need and

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<sup>21</sup> The Herefordshire Independent Advisory Group inputs into neighbourhood police services across the county. They scrutinise and influence the activities and policies of West Mercia Police.

for local authorities and agencies to better share information and knowledge about the issues. Addressing transit provision for Gypsies and Travellers were particularly of concern and one which stakeholders emphasised the need a 'joined up' cross boundary approach.

- 4.30 Stakeholders noted ways in which they currently do and do not successfully cooperate regarding these communities. There can be reluctance by decision-makers to take forward action, particularly in relation to the travelling communities due to potential opposition from the settled community. It was noted that a multi-agency group in Herefordshire:

...provides opportunities for different local authority departments to work together and with other external agencies. The preparation of the DPD strengthened cross departmental working between the traveller's team, education and planning policy and we will continue to improve this in the future.

- 4.31 It was suggested that there is a need for improved communication between local authorities and agencies to develop a whole systems approach and a more effective joint response to meet the needs of these communities, particularly in reaction to accommodation, health, education, legal support and service provision services. According to one Herefordshire stakeholder:

I think that our local authority does well in communicating and liaising with the Gypsy and Traveller community although joined-up thinking between local authority departments could be improved.

- 4.32 Neighbouring authorities spoke of good working relationships with Herefordshire Council. A representative from Worcestershire stated that:

The South Worcestershire Councils and Herefordshire Council have a memorandum of understanding and a duty to cooperate on strategic planning issues including Traveller planning policy.

- 4.33 According to a representative from Gloucestershire:

Cooperation between Herefordshire and the Gloucestershire authorities is good. The issue is possibly that persons in housing need look to geographic localities not local authority boundaries.

- 4.34 Stakeholders commented on how there is often a lack of understanding and effective communication between the different travelling communities and the settled community. It was suggested that local authorities can play an important role in promoting positive images of the communities, particularly Gypsies, Travellers and Travelling Showpeople. This could include positive media articles highlighting instances where the settled and traveller community are living harmoniously. Stakeholders emphasised the need to build bridges

between the communities. It was suggested that more information is needed about their cultures and lifestyles, and better interaction and education would help reduce 'fear of the unknown'.

- 4.35 Gypsies and Travellers residing in bricks and mortar accommodation or on permanent sites were regarded by stakeholders as more 'settled' and less likely to require support. However, it was suggested it would be worthwhile for the settled community and Gypsies and Travellers to meet in order to better understand differing perspectives. This would also help to reduce prejudice.

## Summary

- 4.36 The stakeholder consultation offered important insights into the main issues faced by Gypsies, Travellers and Showpeople within the study area. It was acknowledged that there is a long history of Gypsies, Travellers and Showpeople in the county with large numbers of Travellers in Herefordshire due to the historic farm work available in the 1970s and 80s. However, it was considered that there is a lack of accommodation provision throughout the county and in some neighbouring authorities. According to stakeholders, private family sites tend to be well maintained and households residing on them integrate well into the local community.
- 4.37 Difficulty in identifying suitable land and affordability are key barriers to the provision of new sites, and yards. There being too few permanent sites or yards is mainly due to a lack of suitable land and limited funding for the development and maintenance of new provision. The process of identifying suitable land is deemed problematic. It was suggested that local authorities could work closely with developers, Registered Providers, and landowners to explore opportunities for new sites.
- 4.38 Travelling is usually seasonal and cited the main reasons for travelling as: to be close to friends and family; for employment reasons; for holidays; to attend funerals and weddings; and for cultural reasons i.e. to reinforce cultural identity. The main travel routes noted by stakeholders included along the M4 corridor, the A40 into Wales, and routes to horse fairs at Stow, Cotswolds and Appleby, Cumbria. Key issues regarding too little transit provision include a lack of funding, absence of suitable or available land, and concerns regarding the management and illicit use of transit sites.
- 4.39 There is general acknowledgement by stakeholders that it can be difficult for Gypsies and Travellers to access health and education services. Whilst there has not been a health service which specifically supports the Gypsy and Traveller community in Herefordshire for over 10 years, Herefordshire Council provides a holistic education support service for Gypsy, Roma and Traveller (GRT) families. Whilst acknowledging that relations between the Gypsy and Traveller, and settled community can be difficult, they suggested various ways in which relations could be improved including using grassroots community work to build trust between

the communities. Finally, stakeholders stated that the communication between Herefordshire Council and neighbouring authorities is good, although there may be need for better communication between different departments and agencies.

# 5. Gypsies and Travellers consultation

## Introduction

- 5.1 This chapter provides a snapshot of households residing in the study area at the time of the survey (February 2022) and an analysis of need for current and future pitches across the study area. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families (the accommodation needs of Travelling Showpeople are discussed in Chapter 6).
- 5.2 Table 5.1 below lists the number of authorised sites and pitches, sites and pitches on unauthorised developments, and sites and pitches with temporary planning permission in Herefordshire. Every known authorised and unauthorised site was visited. Due to Covid-19, whilst direct consultation with individual households was mainly undertaken, some was through members of the community (including neighbours and relatives). This resulted in a response rate of over 80% and data concerning accommodation need and occupancy confirmed of all known pitches and sites.

Occupied pitches	Vacant pitches	Potential pitches	UD pitches	Temp pitches
86	1	23	14	0

Source: GTAA 2022

- 5.3 In relation to consultation undertaken on authorised, occupied permanent pitches, the response rates are as follows:

Occupied Authorised Permanent Pitches	No. Surveyed	Response rate %
86	69	80%

Source: GTAA 2022

- 5.4 The consultation included questions regarding issues such as: family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and / or undeveloped pitches and future plans for pitches), travelling patterns, and accommodation needs.
- 5.5 The number and location of pitches were determined using local authority data. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits and consultation with 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.

5.6 All efforts were made to access households 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.

5.7 However, it was not possible to consult with any households residing in bricks and mortar accommodation. As such, an alternative method of determining the accommodation needs of Gypsy and Traveller households residing in bricks and motor accommodation was applied (see step 15 below).

## **Requirement for residential pitches 2021-2026<sup>22</sup>**

5.8 The need for residential pitches in the study area 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 5.3 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

5.9 As discussed in Chapter 2, there are differing interpretations of the PPTS (2015) definition. As such, the needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS (2015) ('PPTS' column).

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

Table 5.3 Need for permanent Gypsy and Traveller residential site pitches 2021-2026

	Ethnic	PPTS
1) Current occupied permanent residential pitches	86	86
<i>Additional residential supply</i>		
2) Number of unused residential pitches available	1	1
3) Number of existing pitches expected to become vacant through mortality	2	2
4) Net number of family units on sites expected to leave the area 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 pitches planned to be built or to be brought back into use	23	23
Total Additional Supply	26	26
<i>Additional residential need</i>		
7) Seeking permanent permission from temporary sites	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	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	0	0
11) Family units on unauthorised developments requiring residential pitches	14	14
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	3	3
13) Net new family units expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing family units	14	12
15) Family units in housing but with a psychological aversion to housed accommodation	9	7
Total Need	40	36
<i>Balance of Need and Supply</i>		
Total Additional Pitch Requirement	14	10
Annualised Additional Pitch Requirement	3	2

Source: GTAA 2022

## Requirement for residential pitches 2021-2026: steps of the calculation

5.10 Information from Herefordshire Council and the census plus evidence from the survey was used to inform the calculations including:

- 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



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

## Supply of pitches 2021-2026

5.12 Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation need used.

### Step 1: Current occupied permanent site pitches

5.13 Based on information provided by the council and corroborated by site visits and household surveys, there are currently 89 authorised pitches, with 86 occupied in the study area.

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

5.14 There are currently 1 vacant pitch.

### Step 3: Number of existing pitches expected to become vacant 2021-2026

5.15 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> This results in the supply of 2 pitches.

### Step 4: Number of family units in site accommodation expressing a desire to leave the study area

5.16 As there are no family units with a desire to leave the study area, this resulted in the supply of 0 pitches.

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

5.17 This is determined by survey data. It was assumed that all those currently residing 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. This resulted in a supply of 0.

### Step 6: Residential pitches planned to be built or brought back into use, 2021-2026

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<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.

- 5.18 This is determined by local authority data and from an assessment of sites during visits. Such 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 currently not occupied and in need of redevelopment. There are 23 pitches in the study area that are expected to be built or brought back into use in the study area during the period 2021-2026. It should be noted that if any of the 26 potential pitches were not developed during the first 5-year period the accommodation needs would subsequently increase e.g. if 4 potential pitches were not developed the accommodation needs would increase by 4 pitches.

## **Need for pitches 2021-2026**

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

### **Step 7: Seeking permanent permission from temporary sites**

- 5.20 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2021-2026 will still require accommodation within the study area. There are no pitches with temporary permission.

### **Step 8: Family units on pitches seeking residential pitches in the study area 2021-2026**

- 5.21 This is 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.
- 5.22 This category of accommodation need overlaps with those moving due to overcrowding, counted in step 12, 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 study area.

### **Step 9: Family units on transit pitches seeking residential pitches in the study area 2021-2026**

- 5.23 This is determined by survey data. These family units reported that they required permanent pitches within the study area in the next five years. There was 0 need resulting from this source.

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

- 5.24 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using

survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 0 households surveyed on unauthorised encampments within the study area during the survey period.

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

5.25 From consultation and data from the councils, there are 14 unauthorised developments in the local authority area. All unauthorised development pitches are regarded by the local authority as tolerated. This results in the need of 14 residential pitches over the period 2021-2026 ('ethnic definition'), and 14 pitches ('PPTS' definition).

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

5.26 There is a need for 3 new households requiring residential pitches over the period 2021-2026 ('ethnic definition'), and 3 pitches ('PPTS' definition).

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

5.27 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area 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. Together, these amount to a net inflow of 0 units in the study area.

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

5.28 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. This will result in the formation of 14 new households requiring residential pitches over the period 2021-2026 ('ethnic definition'), and 12 pitches ('PPTS' definition).

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

5.29 Whilst not a medical condition, 'psychological aversion' is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate a cultural

aversion to residing in bricks and mortar accommodation (see DCLG October 2007)<sup>24</sup>. The factors concerned 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 residing in bricks and mortar accommodation is one factor used to determine accommodation need.

- 5.30 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 reside in bricks and mortar accommodation. From previous GTAA's undertaken by *RRR Consultancy Ltd*, it is estimated that around 10% of Gypsies and Travellers residing in bricks and mortar accommodation experience psychological aversion and require accommodating on sites. This was based on previous GTAA's undertaken by *RRR Consultancy* including Central Lincolnshire (2013 and 2020), South Kesteven and Rutland (2016), and Bassetlaw (2019). Local Plan examinations already undertaken have found these GTAA's to be sound. This will result in the formation of 9 new households requiring residential pitches over this five-year period ('ethnic definition'), and 7 pitches ('PPTS' definition).

## Balance of Need and Supply

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

Table 5.4: Summary of Gypsy and Traveller pitch needs 2021-26		
	Ethnic	PPTS
Supply	26	26
Need	40	36
Difference	14	10

Source: GTAA 2022

## Requirement for residential pitches 2026-2041

- 5.32 Considering future accommodation need it is assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area accommodation need to 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 5.5 below.

<sup>24</sup> DCLG, Consultation on revised planning guidance in relation to Travelling Showpeople, January 2007.

Please note that the 2021 base figures include both authorised occupied and vacant pitches, whilst the 2026 base figures assume that any potential pitches have been developed.

5.33 2026 pitch base figures are determined by a number of factors including:

- the number of occupied pitches in 2021 (as determined by the household survey)
- the number of vacant pitches in 2021 (as determined by the household survey)
- the number of potential pitches (as determined by local authority data)
- accommodation need for the period 2021-2026 (as determined by the GTAA)

5.34 In relation to the accommodation needs based on the ethnic identity definition, the 2026 base data is determined by:

- Occupied pitches in 2021 (86) + vacant pitches (1) + potential pitches (23) + additional needs 2021-2026 (14) = 124 pitches.

5.35 It is assumed that by 2026 vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply.

Table 5.5 Base figures for Gypsy and Traveller pitches as at 2021					
	2021 Base	Vacant	Potentials 2021-26	Need 2021-26	2026 Base
Ethnic	86	1	23	14	124
PPTS	86	1	23	10	120

Source: GTAA 2022

5.36 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 for Gypsy and Traveller households does not represent national planning policy.

5.37 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.28% per annum (compound) equating to a 5-year rate of 11.92% 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 2026-2041.

5.38 Table 5.6 shows the accommodation need for the local authority area over the 20-year period 2021-2041.

Period	Ethnic definition	PPTS 2015 definition
2021-26	14	10
2026-31	8	8
2031-36	9	8
2036-41	10	9
<b>Total 2021-41</b>	<b>41</b>	<b>35</b>

Source: GTAA 2022

## Requirements for transit pitches/negotiated stopping arrangements

- 5.39 In relation to transit provision, it is recommended that the local authority adopts a negotiated stopping policy. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets.
- 5.40 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).
- 5.41 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for the local authority to respond to the temporary accommodation needs of transiting households within the area rather than simply directing them to neighbouring authorities. Also, the local authority should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

## Summary

- 5.42 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. It indicates that there is a need over the period 2021-2041 for 36 pitches (ethnic definition) or 30 pitches (PPTS definition). In relation to transit provision it recommends the adoption of a negotiated stopping policy.

# 6. Travelling Showpeople consultation

## Introduction

- 6.1 As described in Chapter 1, this GTAA considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. Nonetheless, government guidance (DCLG Planning Policy for Traveller Sites August 2015) indicates that local authorities should consider the accommodation needs of Travelling Showpeople families. As such, they have been included in this report.
- 6.2 There are 10 authorised Travelling Showpeople plots located within the study area. Table 6.1 below lists the number of authorised plots, and unauthorised developments (UD) (plots), and yards and plots with temporary planning permission per local authority within the study area. Every known authorised and unauthorised yard was visited. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including neighbours and relatives) was undertaken. This resulted in 100% response rate and data concerning accommodation need and occupancy confirmed of all known plots and yards.

Table 6.1 Travelling Showpeople yards and plots per authority		
Plots	UD plots	Temp plots
10	0	0

Source: Study area local authorities

- 6.3 Table 6.2 shows the number and percentage of surveys undertaken compared with the number of occupied authorised permanent plots. Consultation was undertaken in relation to 15 Travelling Showpeople households residing in the study area. The consultation included questions regarding issues such as: family composition (per plot), occupancy of existing plots (including number of and reasons for vacant and /or undeveloped plots and future plans for plots), management and suitability of current yards and plots (including facilities and services), travelling patterns, and accommodation needs.

Table 6.2 Travelling Showpeople survey response rate		
Occupied Authorised Permanent Plots	No. Surveyed	Response rate %
10	10	100%

Source: GTAA 2022

## Requirement for residential plots 2021-2026

- 6.4 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 6.3 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.
- 6.5 As discussed in Chapter 2, there are differing interpretations of the PPTS (2015) definition of Travelling Showpeople. However, as all households travel and all meet both the PPTS (2015) definition and the work interpretation, only one needs figure is provided.

Table 6.3 Need for permanent residential Travelling Showpeople plots 2021-2026	
1) Current occupied permanent residential site plots	10
<i>Current residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality	0
4) Net number of family units on sites expected to leave the area in next 5 years	0
5) Number of family units on sites expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use	0
Total Supply	0
<i>Current residential need: Plots</i>	
7) Seeking permanent permission from temporary plots	0
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots in the area	0
11) Family units on unauthorised developments requiring residential plots in the area	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	4
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	2
Total Need	6
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	6
Annualised Additional Plot Requirement	1

Source: GTAA 2022

## Requirement for residential plots 2021-2026: steps of the calculation

- 6.6 Information from local authorities and evidence from the survey was used to inform the calculations including:
- 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

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

## Supply of plots 2021-2026

### Step 1: Current occupied permanent plots

6.8 Based on information provided by the Council and corroborated by information from plot surveys. There are currently 4 authorised yards with planning permission for 10 plots. All plots are occupied.

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

6.9 As all plots are occupied there are 0 unused plots.

### Step 3: Number of existing plots expected to become vacant 2021-2026

6.10 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. It then calculates the number of plots that would become vacant as a result of the mortality. This results in a supply of 0 plots.

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

6.11 This was determined by survey data. It was assumed, that those currently residing 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 that the plots are not currently occupied and that none of the intended households indicated they would be leaving the study area, this resulted in the supply of 0 plots.

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

6.12 This was determined by survey data. It was assumed that all those currently residing 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 12), would be able to do so.

6.13 As with step 5, a supply of 0 plots in the study area were expected from this source, excluding those moving out of the study area, since these are already counted in step 4.

### Step 6: Residential plots planned to be built or brought back into use, 2021-2026

- 6.14 This can include plots which have been partly developed or which were previously occupied but are now vacant and in need of redevelopment. There are 0 plots in the study area that are expected to be built or brought back into use during the period 2021-2026.

## **Need for plots 2021-2026**

### **Step 7: Seeking permanent permission from temporary plots**

- 6.15 This is determined by local authority data. It is assumed families residing on plots whose planning permission expires within the period 2021-2026 will still require accommodation within the study area. There are currently 0 plots with temporary planning permission located in the area.

### **Step 8: Family units on plots seeking residential plots in the study area 2021-2026**

- 6.16 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.

- 6.17 This category of need overlaps with those moving due to overcrowding, counted in step 12. In order to avoid double-counting family units which both are overcrowded and seeking accommodation are counted only once. This generates a total need of 0 plots in the study area.

### **Step 9: Family units on transit plots seeking residential plots in the study area**

- 6.18 This generates a total need of 0 plots as there is no transit yard in the study area.

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

- 6.19 There were 0 households residing on unauthorised encampments interviewed during the survey period, so there is a need of 0 plots arising from this source.

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

- 6.20 There are 0 unauthorised plots in the study area and therefore there is a need of 0 plots.

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

- 6.21 Overcrowding on a Travelling Showpeople plot may differ to that on Gypsy and Traveller pitch due to the larger need for equipment and vehicle storage. Showpeople require more space for their equipment and vehicles as well as enough space for accommodation such as caravans (static and tourers). This generates a total need of 4 plots in the study area.

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

- 6.22 This generates a total need of 0 plots in the study area.

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

6.23 This generates a total need of 2 plots in the study area.

**Balance of Need and Supply**

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

Table 6.4: Summary of Travelling Showpeople plot needs 2021-26

Supply	0
Need	6
Difference	6

Source: GTAA 2022

**Requirement for residential plots 2026-2041**

6.25 Considering future accommodation need it assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto yards within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area accommodation need to be considered. The base figures regarding the number of plots on yards at the end of the first 5-year period are shown in Table 6.5 below. Please note that the 2021 base figures include both authorised occupied and vacant plots, whilst the 2026 base figures assume that any potential plots have been developed.

6.26 2026 pitch base figures are determined by a number of factors including:

- the number of occupied plots in 2021
- the number of vacant plots in 2021
- the number of potential plots
- accommodation need for the period 2021-2026

6.27 It is calculated as follows:

- Occupied plots in 2021 (10) + vacant plots (0) + potential plots (0) + additional needs 2021-2026 (6) = 16 plots.

6.28 It is assumed that by 2026 vacant plots will be occupied, potential plots will have been developed and occupied, and any additional need has been met by new supply.

2021 Base	Vacant	Potentials	2021-26	Need	2021-25	2026 Base
10	0	0		6		16

5.43 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.11% per annum (compound) equating to a 5-year rate of 11.0% 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 2026-2041. Table 6.6 shows the accommodation need for the local authority area over the 20-year period 2021-2041.

Table 6.6: Summary of accommodation needs 2026-41  
(Travelling Showpeople plots)

2021-26	6
2026-31	1
2031-36	1
2036-41	1
Total 2026-41	9

Source: GTAA 2022

## Summary

6.29 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Travelling Showpeople plots. It indicates that there is a need over the period 2021-2041 for 9 additional plots.

# 7. Conclusion and recommendations

## Introduction

- 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 provision, 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.

## Accommodation needs

- 7.3 The following outlines the accommodation needs in relation to Gypsies and Travellers (Table 7.1) and Travelling Showpeople (Table 7.2) for the period 2021-2041.

### Gypsies and Travellers

Period	Ethnic definition	PPTS 2015 definition
2021-26	14	10
2026-31	8	8
2031-36	9	8
2036-41	10	9
<b>Total 2021-41</b>	<b>41</b>	<b>35</b>

Source: GTAA 2022

### Travelling Showpeople

Table 7.2: Summary of Travelling Showpeople accommodation needs 2021-41 (plots)	
2021-26	6
2026-31	1
2031-36	1
2036-41	1
<b>Total 2021-41</b>	<b>9</b>

Source: GTAA 2022

## The location of new provision

- 7.4 This is general consensus that smaller sites and yards are preferred by Gypsy, Traveller, Showpeople, and residential caravan dweller communities due to better management and

maintenance of provision and security. Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities alongside discussions with different community groups, to ensure that any additional need that may arise is identified.

7.5 Ensuring that new accommodation provision is located in a safe environment is important although the impact of land costs on determining feasibility must also be considered. The settled community neighbouring sites or yards should be involved in consultations. As discussed in previous chapters, households and organisations are interested in increasing current permanent accommodation provision on existing sites or yards, or developing new provision elsewhere in the study area. As discussed in Chapter 4, there is the potential to address some of the existing need for Gypsies and Travellers in land either already owned by the households or land the families intend to purchase.

7.6 In terms of identifying broad locations for new permanent sites and yards, 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 Green Belt, 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?

- 7.7 It is important that new provisions are located close to amenities such as shops, schools and health facilities or where there are good transport links or within reasonable distance for households to access the necessary facilities and amenities. 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. As stated in Chapter 2, the study area local authority Local Plan policies contain locational criteria to help determine suitable locations for the development of new sites or yards.
- 7.8 PPTS (2015) 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
- 7.9 In some cases, 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. For example, if a household is unable to gain planning permission or find a site or yard in the local area, they might have to consider alternative options in neighbouring or nearby local authorities.
- 7.10 One option is to provide new pitches as part of sustainable urban extensions. Local authorities may choose to include a requirement for Gypsy and Traveller pitches to be included in an urban extension and stipulate that they are developed in that location because it has good access to schools, shops, community facilities and places of employment. There are yet no examples of local authorities successfully developing new Gypsy and Traveller pitches as part of urban extensions. However, some local authorities have incorporated the principle into local planning policies including Mid Devon District Council, Charnwood Borough Council, and Worcester City Council.

## **The size of new provision**

- 7.11 There are differences between the different communities as to the ideal size of new accommodation provision. The following presents an overview according to community type:

## Gypsy and Traveller pitches

- 7.12 The CLG's '[Designing Gypsy and Traveller Sites – Good Practice Guide](#)' (2008) (withdrawn 2015) 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.
- 7.13 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
- 7.14 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.

## Showpeople plots

- 7.15 New plots need to provide sufficient space for work equipment as well as space for residential accommodation. This includes space situated away from the living quarters for the storage and maintenance of work equipment and vehicles, as well as space to accommodate domestic vehicles. Due to the need for both accommodation space and space for the storage and maintenance of large equipment, Showpeople plots tend to be much larger than Gypsy and Traveller pitches.



## Transit provision

- 7.16 It should be noted that Herefordshire Council propose to apply for capital funding to develop a temporary stopping place. It is also recommended that Herefordshire Council adopt a negotiated stopping policy. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets.
- 7.17 Agreements could be made with households residing on sites and 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

- 7.18 This report provides the assessment of levels of accommodation need needed by Gypsies, Travellers, and Showpeople. It is then for Herefordshire Council to determine how it will use the information provided in this report and address the needs via its Local Plan.
- 7.19 Local Plans have to adhere to the National Planning Policy Framework (NPPF) (July 2021), PPTS (2015), and the Equalities Act (2010). As such, in relation to Gypsies and Travellers, it is recommended that the Council incorporate both the PPTS (2015) and the ethnic calculations into their local plan. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also able to demonstrate that how accommodation need for those who do not meet the PPTS (2015) definition are being addressed. It is important to note that this only refers to Gypsies and Travellers and not Travelling Showpeople.
- 7.20 The local authorities may also need to consider additional accommodation need not identified at the time of the assessment and therefore not included in calculation of need for this assessment, or accommodation need which may materialise over the local plan period. For example, the accommodation needs of households not included in the calculation of need as part of this assessment (i.e. not living in bricks and mortar, on known authorised or unauthorised sites, encampments or transit provision, or from outside of the study area) should be considered separate to the need identified in this assessment. Such additional accommodation needs could be met through windfall allocations.
- 7.21 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:

### **Planning policy:**

- 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 sites and yards to determine how they could expand the number of pitches to meet families' accommodation needs.
- To consider alternative options for developing new sites and yards such as developing them 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, and Showpeople communities.
- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups), to review its current, historic and potential planning status, and review the most effective way forward.
- 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, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

**Management:**

- 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 training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- For Herefordshire Council 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 in relation to Gypsy and Traveller, and Travelling Showpeople issues.
- During the ongoing implications of Covid-19 impacting the communities, determine help and support the local authorities and other services could provide to the households

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

## 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.