

Excellent research for the public, voluntary and private sectors



# **Brighton & Hove City Council**

# **Gypsy and Traveller Accommodation Assessment**

**Draft Final Report** 

September 2019



Opinion Research Services | The Strand, Swansea SA1 1AF Steve Jarman, Claire Thomas, Ciara Small and Michael Bayliss enquiries:  $01792\ 535300 \cdot info@ors.org.uk \cdot www.ors.org.uk$ 

© Copyright September 2019

Contains public sector information licensed under the Open Government  $\$  Licence v 3.0

Contains OS Data © Crown Copyright (2019)

# **Contents**

1.	Executive Summary	6
	Introduction and Methodology	6
	Key Findings	6
	Additional Pitch Needs – Gypsies and Travellers	6
	Brighton & Hove (excluding SDNP)	8
	Brighton & Hove – SDNP Area	8
	Additional Plot Needs - Travelling Showpeople	9
	Transit Recommendations	10
2.	Introduction	11
	Definitions	11
	The Planning Definition in PPTS (2015)	11
	Definition of Travelling	12
	Legislation and Guidance for Gypsies and Travellers	14
	PPTS (2015)	14
	Revised National Planning Policy Framework (2019)	16
3.	Methodology	17
	Background	17
	Glossary of Terms/Acronyms	18
	Desk-Based Review	18
	Stakeholder Engagement	18
	Working Collaboratively with Neighbouring Planning Authorities	18
	Survey of Travelling Communities	18
	Engagement with Bricks and Mortar and Roadside Households	19
	Timing of the Fieldwork	20
	Applying the Planning Definition	20
	Undetermined Households	21
	Households that Do Not Meet the Planning Definition	<b>2</b> 3
	Calculating Current and Future Need	<b>2</b> 3
	Pitch Turnover	24
	Transit Provision	25
4.	Gypsy, Traveller & Travelling Showpeople Sites & Population	26
	Introduction	26
	Sites and Yards in Brighton & Hove	27
	MHCLG Traveller Caravan Count	27
	Introduction	28
	Views of Council Officers in the Study Areas	28

	Neighbouring Authorities	31
	Other Stakeholders	36
6.	Survey of Travelling Communities	38
	Interviews with Gypsies and Travellers	38
	Interviews with Gypsies and Travellers in Bricks and Mortar and Living Roadside	39
7.	Current and Future Pitch Provision	.40
	Introduction	40
	New Household Formation Rates	40
	Breakdown by 5 Year Bands	42
	Applying the Planning Definition	42
	Interviews with Gypsies and Travellers in Bricks and Mortar and Roadside	43
	Migration	44
	Pitch Needs – Gypsies and Travellers that meet the Planning Definition (Brighton & Hove excluding SDNP)	45
	Pitch Needs – Undetermined Gypsies and Travellers (Brighton & Hove excluding SDNP)	
	Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition (Brighton & Hove excluding SDNP)	
	Pitch Needs – Gypsies and Travellers that meet the Planning Definition (SDNP)	
	Pitch Needs – Undetermined Gypsies and Travellers (SDNP)	
	Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition (SDNP)	
	Travelling Showpeople Needs	
	Plot Needs – Travelling Showpeople	
	Transit Requirements	
	MHCLG Traveller Caravan Count	
	Stakeholder Interviews and Local Data	50
	Potential Implications of PPTS (2015)	52
	Transit Recommendations	52
8.	Conclusions	53
	Gypsies and Travellers – Brighton & Hove (excluding SDNP)	53
	Gypsies and Travellers – SDNP area of Brighton & Hove	53
	Travelling Showpeople	55
	Transit Provision	55
	Summary of Need to be Addressed – Brighton & Hove (excluding SDNP)	55
	Summary of Need to be Addressed – Brighton & Hove (SDNP)	56

List of Figures	57
Appendix A: Glossary of Terms / Acronyms used	59
Appendix B: Undetermined Households	61
Appendix C: Households that did not meet the Planning Definition	63
Appendix D: Site and Yard List (April 2019)	65
Appendix E: Household Interview Questions	66
Appendix F: Technical Note on Household Formation and Growth Rates	75

# Executive Summary

#### Introduction and Methodology

- The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Brighton & Hove City Council (the Council), including the area that falls within the South Downs National Park. The GTAA also includes a separate assessment of need for the areas of Brighton & Hove that fall within the South Downs National Park (SDNP).
- As well as updating previous GTAAs, another reason for completing the study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term "persons...who have ceased to travel permanently", meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Paragraph 2.7 for the full definition).
- The GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2019 to 2034. The outcomes of this study supersede the outcomes of any previous GTAAs for Brighton & Hove City Council and covering the Brighton & Hove area within the South Downs National Park.
- The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in Brighton & Hove through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites, yards and encampments. A total of 25 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Brighton & Hove. There were no Travelling Showpeople identified in Brighton & Hove. A further 17 interviews were completed with households living in bricks and mortar or living on the roadside who had links to Brighton & Hove. A total of 11 stakeholder interviews were also completed.
- The fieldwork for the study was completed between February and April 2019 and this is the baseline date for the study.

# **Key Findings**

# Additional Pitch Needs - Gypsies and Travellers

Overall the additional pitch needs for Gypsies and Travellers for the period 2019-2034 are set out below. Additional needs are set out for those households that met the planning definition of a Gypsy or Traveller; for any undetermined households¹ where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite up

<sup>&</sup>lt;sup>1</sup>See Paragraph 3.28 for further information on undetermined households.

- to three visits to each site) who may meet the planning definition; and for those households that did not meet the planning definition although this is no longer a requirement for a GTAA.
- Only the need from those households who met the planning definition and from those of the undetermined households who subsequently demonstrate that they meet it should be formally considered as need arising from the GTAA.
- The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate.
- ORS would normally recommend that Brighton & Hove City Council and SDNP will need to carefully consider how to address any need associated with undetermined Travellers as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. However, as interviews were completed with all identified households, there is no undetermined need. In terms of Local Plan Policies, the Council and SDNP already have criteria-based policies in place (as suggested in PPTS) to address windfall need from households seeking to move to the area (in-migration) or from additional households currently living in bricks and mortar.
- In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies.
- This approach is specifically referenced in the revised National Planning Policy Framework (February 2019). Paragraph 60 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 61 then states that 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'
- 1.12 It is recognised that the Council already has in place an adopted Local Plan that sets out overall housing need. Similarly, the SDNPA has recently adopted its Local Plan which similarly sets out housing need and supply. When these plans are reviewed, or a new plan prepared, the findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to those households that did not meet the planning definition of a Traveller.
- As an example, it is again useful to look at the East Hertfordshire Local Plan that was found to be sound in an Inspectors Report that was issued in July 2018. The Local Plan contains *Policy HOU10 New Park Home Sites for Non-Nomadic (i.e. households that do not meet the planning definition of a Traveller) Gypsies and Travellers and Travelling Showpeople*. This sets out that any applications for planning permission for park homes for Gypsies and Travellers and Travelling Showpeople that do not meet the planning definition must be in accordance with the NPPF and PPTS and the criteria set out in Policy HOU10, and not under the criteria set out in *Policy HOU9 Gypsies and Travellers and Travelling Showpeople*.

There were 9 Gypsy or Traveller households identified in Brighton & Hove that met the planning definition; no undetermined households that may meet the planning definition; and 33 households that did not meet the planning definition.

#### Brighton & Hove (excluding SDNP)

- There is no need for additional pitches for households that met the planning definition as no households that were interviewed in Brighton & Hove or with links to Brighton & Hove met the planning definition.
- <sup>1.16</sup> There is no need **for additional pitches for undetermined households** as interviews were completed with all identified households.
- Whilst not now a requirement to include in a GTAA, there is a need for 10 additional pitches for households that did not meet the planning definition. This is all from in-migration as a result of displacement.
- <sup>1.18</sup> Figure 1 summarises the identified need and Figure 2 breaks this down by 5-year periods.

Figure 1 - Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) (2019-34)

Status	2019-34
Meet Planning Definition	0
Undetermined	0
Do not meet Planning Definition	10

Figure 2 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition by year periods

Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	Total
	10	0	0	10

## Brighton & Hove – SDNP Area

The assessment of need has also covered the parts of the South Downs National Park that are located within Brighton & Hove (see map below). The public site and the transit site at Horsdean are both located within the SDNP area of Brighton & Hove, however the site provides accommodation for Gypsy and Traveller needs arising from the whole district, whether inside or outside the National Park.



- There is a need for **11** additional pitches for households that met the planning definition. This is made up of 1 pitch from a concealed or doubled-up household or adult; 1 pitch from movement from bricks and mortar; 1 pitch for a teenage child living on a site who is in need of a pitch of their own in the next 5 years; 1 from a teenage child living in bricks and mortar who is in need of a pitch of their own in the next 5 years; 2 pitches from households living on the roadside; and 5 pitches as a result of new household formation (based on the demographics of the residents).
- <sup>1.21</sup> There is no need **for additional pitches for undetermined households** as interviews were completed with all identified households.
- Whilst not now a requirement to include in a GTAA, there is a need for **33 additional pitches for households that did not meet the planning definition**. This is made up of 5 concealed or doubled-up households or single adults; movement of 1 household from bricks and mortar; 1 household that is on the waiting list; 7 teenagers living on sites who will be in need of a pitch of their own; 3 teenagers living on the roadside who will be in need of a pitch of their own; 2 teenagers from a household on the waiting list who will be in need of a pitch of their own; 5 households from inmigration or living on the roadside; and 9 pitches from new household formation using a rate of 2.00% derived from the household demographics.
- Figure 3 summarises the identified need and Figure 4 breaks this down by 5-year periods.

Figure 3 – Additional need for Gypsy and Traveller households in SDNP area of Brighton & Hove (2019-34)

Status	2019-36
Meet Planning Definition	11
Undetermined	0
Do not meet Planning Definition	33

Figure 4 – Additional need for Gypsy and Traveller households in SDNP area of Brighton & Hove that meet the Planning Definition by year periods

Years	0-5	6-10	11-15	Total
Tears	2019-24	2024-29	2029-34	IUlai
	6	2	3	11

# Additional Plot Needs - Travelling Showpeople

There were no Travelling Showpeople identified living in Brighton & Hove so there is no current or future need for additional plots.

#### **Transit Recommendations**

Due to the existing public transit site in the SDNP area of Brighton & Hove it is recommended that there is no need for any additional permanent public transit provision at the time. However, given that there are some seasonal increases in the number of unauthorised encampments during the summer months, it is recommended that the Council consider the provision of some additional short-term seasonal provision.

# 2. Introduction

- The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Brighton & Hove. The outcomes of the study supersede the outcomes of the previous Traveller and Travelling Showpeople Accommodation Needs Assessments completed in Brighton & Hove.
- The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act (2016) and the revised National Planning Policy Framework (NPPF) 2019.
- The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of Traveller pitches and plots covering the period 2019 to 2034. As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- The baseline date for the study is April 2019 which was when the household interviews were completed.

#### **Definitions**

The planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

## The Planning Definition in PPTS (2015)

For the purposes of the planning system, the definition was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

For the purposes of this planning policy "gypsies and travellers" means:

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

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

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

For the purposes of this planning policy, "travelling showpeople" means:

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.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

The key change that was made to both definitions was the removal of the term "persons...who have ceased to travel permanently", meaning that those who have ceased to travel permanently will no longer fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

#### **Definition of Travelling**

- One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term 'nomadic'.
- R v South Hams District Council (1994) defined Gypsies as "persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.
- In Maidstone BC v Secretary of State for the Environment and Dunn (2006), it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- <sup>2.12</sup> In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated

- that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 2.15 Wrexham County Borough Council v National Assembly of Wales and Others (2003) determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- The implication of these rulings in terms of applying the planning definition is that it will **only** include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work such as holidays and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependents with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled for work in the past. In addition, households will also have to demonstrate that they plan to travel again for work in the future.
- This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

This was further reinforced in a more recent Decision Notice for an appeal in Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander of travel for the purposes of making or seeking their livelihood.

#### Legislation and Guidance for Gypsies and Travellers

- Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
  - » Planning Practice Guidance<sup>2</sup> (PPG), 2014
  - » Planning Policy for Traveller Sites (PPTS), 2015
  - » The Housing and Planning Act, 2016
  - » National Planning Policy Framework (NPPF), 2019
- <sup>2.22</sup> In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.
- Travelling Showpeople is set out in the PPTS (2015). It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition, the Housing and Planning Act makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition through the assessment of all households living in caravans.

## PPTS (2015)

- <sup>2.24</sup> PPTS (2015), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):
  - » Local planning authorities should make their own assessment of need for the purposes of planning.
  - » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
  - » To encourage local planning authorities to plan for sites over a reasonable timescale
  - » That plan-making and decision-taking should protect Green Belt from inappropriate development.

<sup>&</sup>lt;sup>2</sup> With particular reference to the sections on Housing and Economic Development Needs Assessments

- » To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.
- » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and Traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.
- <sup>2.25</sup> In practice, the document states that (PPTS Paragraph 9):
  - » Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.
- PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:
  - » Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.
  - » Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
  - » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Dutyto-Cooperate on strategic planning issues that cross administrative boundaries).
  - » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
  - » Protect local amenity and environment.
- Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS 2015 also notes in Paragraph 11 that:
  - » Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.

#### Revised National Planning Policy Framework (2019)

- The most recent version of the revised National Planning Policy Framework was issued in February 2019. Paragraph 60 of the revised NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.
- Paragraph 61 then states that 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'
- <sup>2.30</sup> This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

# 3. Methodology

#### Background

- Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in August 2015, the Housing and Planning Act (2016) and the revised NPPF (2019). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- ORS would note that since the changes to the PPTS in August 2015 the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Cambridge, Cheltenham, Cotswold, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, South Cambridgeshire and Tewkesbury.
- The Local Plan Inspector for the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy, following hearings in April 2016 and July 2017, concluded in her final Examination Report that was issued in October 2017:

'The methodology behind this assessment incorporates a full demographic study of all occupied pitches, a comprehensive effort to undertake interviews with Gypsy and Traveller households, and consideration of the implications of the new national policy. I am satisfied that the GTAA provides a robust and credible evidence base and I accept its findings.'

The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:

'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'

The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

#### Glossary of Terms/Acronyms

A Glossary of Terms/Acronyms can be found in **Appendix A**.

#### **Desk-Based Review**

- <sup>3.8</sup> ORS collated a range of secondary data that was used to support the study. This included:
  - » Census data.
  - » Traveller Caravan Count data.
  - » Records of unauthorised sites/encampments.
  - » Information on planning applications/appeals.
  - » Information on enforcement actions.
  - » Existing Needs Assessments and other relevant local studies.
  - » Existing national and local policy, guidance and best practice.

#### Stakeholder Engagement

as with wider stakeholders through telephone interviews. Six interviews were undertaken with Council Officers from the study area and SDNP. Interviews were also completed with a representative from Friends, Families and Travellers, with a Health Visitor and with a Community Midwife.

## Working Collaboratively with Neighbouring Planning Authorities

- To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities. These interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Councils set out below. Again, a detailed topic guide was agreed with the Council.
  - » Adur and Worthing Councils.
  - » Mid Sussex District Council.
  - » Lewes and Eastbourne Councils.
  - » South Downs National Park.

# **Survey of Travelling Communities**

3.11 Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 visits were made to households where it was not initially possible to conduct an interview because they were not available at the time.

- Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.
- ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The site interview questions that were used (see **Appendix E**) have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the planning definition. All sites and yards were visited by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- Researchers also sought information from residents on the type of pitches they may require in the future for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.15 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).
- Researchers also distributed copies of an information leaflet that was prepared by Friends, Families and Travellers explaining the reasons for the need to complete the household interview as part of the GTAA process.

## Engagement with Bricks and Mortar and Roadside Households

- The 2011 Census recorded 37 households that were identified as either Gypsies or Irish Travellers who lived in a house in Brighton & Hove and 50 who lived in a flat or maisonette.
- ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; information from housing registers; and other local knowledge from stakeholders. In addition, ORS worked closely with Friends, Families and Travellers to arrange a drop-in session at their offices in Brighton. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity put in place.

Figure 5 - Friends, Families and Traveller Leaflet



## Timing of the Fieldwork

ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also avoid days of known local or national events. The fieldwork was completed between February 2019 and April 2019 and Researchers were able to collect information on the majority of residents.

# Applying the Planning Definition

The primary change to PPTS (2015) in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. As the revised PPTS was only issued in 2015, only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age.

- The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
  - » Whether any household members have travelled in the past 12 months.
  - » Whether household members have ever travelled.
  - » The main reasons for travelling.
  - » Where household members travelled to.
  - » The times of the year that household members travelled.
  - » Where household members stay when they are away travelling.
  - » When household members stopped travelling.
  - » The reasons why household members stopped travelling.
  - » Whether household members intend to travel again in the future.
  - » When and the reasons why household members plan to travel again in the future.
- When the household survey was completed, the answers from these questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.
- Households that need to be considered in the GTAA fall under one of three classifications that will determine whether their housing needs will need to be assessed in the GTAA. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
  - » Households that travel under the planning definition.
  - » Households that have ceased to travel temporarily under the planning definition.
  - » Households where an interview was not possible who may fall under the planning definition.
- Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they will be assessed to provide the Council with components of need to consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the revised NPPF (2019).

#### **Undetermined Households**

As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be assessed as part of the GTAA where they are believed to be Gypsies and Travellers who may meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed; an approach has been taken that seeks an estimate of potential need from

- these households. This will be an additional need figure over and above the need identified for households that do meet the planning definition.
- 3.27 The estimate seeks to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. For the latter the ORS national rate of 1.50% has been used as the demographics of residents are unknown.
- <sup>3.28</sup> Should further information be made available to the Councils that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or through wider assessments of housing need.
- ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 25% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 300 interviews that have been completed) and in some local authorities, no households meet the planning definition.
- ORS are not implying that this is an official national statistic rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on 25% of them at a representative range of sites. Approximately 25% meet the planning definition. ORS also asked similar questions on travelling in over 2,000 pre-PPTS (2015) household interviews and found that 10% of households would have met the PPTS (2015) planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.
- This would suggest that it is likely that only a proportion of the potential need identified from undetermined households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through separate Local Plan Policies.
- The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:
- 150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, MM242h is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" the whole Plan need not be reviewed.

#### Households that Do Not Meet the Planning Definition

- Households who do not travel for work now fall outside the planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance<sup>3</sup> related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the revised NPPF (February 2019).
- Paragraph 61 of the revised NPPF states that 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

## Calculating Current and Future Need

<sup>3.36</sup> To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

# **Supply of Pitches**

- The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:
  - » Current vacant pitches.
  - » Pitches currently with planning consent due to be developed within 5 years.
  - » Pitches vacated by people moving to housing.
  - » Pitches vacated by people moving from the study area (out-migration).
- 3.38 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation i.e. on a public or social rented site, or on a private site that is run on a

<sup>&</sup>lt;sup>3</sup> Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

#### **Current Need**

- The second stage was to identify components of current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:
  - » Households on unauthorised developments for which planning permission is not expected.
  - » Concealed, doubled-up or over-crowded households (including single adults).
  - » Households in bricks and mortar wishing to move to sites.
  - » Households in need on waiting lists for public sites.

#### **Future Need**

- 3.40 The final stage was to identify components of future need. This includes the following four components:
  - » Teenage children in need of a pitch of their own in the next 5 years.
  - » Households living on sites with temporary planning permissions.
  - » New household formation.
  - » In-migration.
- 3.41 Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 6 of this report.
- All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showpeople are identified separately and the needs are identified in 5-year periods to 2038.

#### Pitch Turnover

Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch

turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

In addition, a recent GTAA Best Practice Guide produced jointly by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

#### **Transit Provision**

- PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas, including:
  - » Transit sites
  - » Emergency stopping places
  - » Temporary (seasonal) sites
  - » Negotiated Stopping Agreements
- In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry of Housing Communities and Local Government (MHCLG)<sup>4</sup> Traveller Caravan Count. The outcomes of discussions with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

<sup>&</sup>lt;sup>4</sup> Formerly the Department for Communities and Local Government (DCLG).

# 4. Gypsy, Traveller & Travelling Showpeople Sites & Population

#### Introduction

- One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size<sup>5</sup>. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area over the fifteen-year period to 2034.
- The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- The Gypsy, Traveller and Travelling Showpeople population also has other types of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they

<sup>&</sup>lt;sup>5</sup> Whilst it has now been withdrawn, Government Guidance on *Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer (for example a static caravan, park home or chalet) and touring caravan, parking space for two vehicles and a small garden area.

- travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- <sup>4.5</sup> Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

#### Sites and Yards in Brighton & Hove (including SDNP)

In Brighton & Hove, at the base date for the GTAA, there was 1 public site (12 pitches) and 1 public transit site (21 pitches). There were no private sites, no unauthorised sites and no Travelling Showmen's yards. See Appendix D for further details.

Category	Sites/Yards	Pitches/Plots
Public sites	1	12
Private with permanent planning permission	0	0
Private with temporary planning permission	0	0
Tolerated sites	0	0
Unauthorised sites	0	0
Public transit sites	1	21
Travelling Showpeople yards	0	0

#### MHCLG Traveller Caravan Count

- 4.7 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013 it was renamed the Traveller Caravan Count due to the inclusion of data on Travelling Showpeople.
- <sup>4.8</sup> As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fitfor-purpose. However, the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.

# 5. Stakeholder Engagement

#### Introduction

- To be consistent with the guidance set out in Planning Policy for Traveller Sites and the methodology used in other GTAA studies, ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of travelling communities. This took the form of telephone interviews which were tailored to the role of the individual.
- The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments and transit provision; and cross-border issues. Importantly, stakeholders who are in contact with members of travelling communities who are in bricks and mortar were asked if they could inform them that the study is taking place and provide details about how they could participate in a confidential telephone interview with a member of the ORS research team.
- Interviews were undertaken with Council Officers from the study area. In addition, an interview was completed with a representative from friends, Families and Travellers.
- As stated in PPTS, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a representative in each of the following neighbouring planning authorities:
  - » Adur and Worthing
  - » Horsham
  - » Lewes and Eastbourne
  - » Mid Sussex
  - » South Downs National Park
- Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used.
- This section of the Report provides the response from Council Officers in the study area, from Council Officers from neighbouring local planning authorities, and from other stakeholders.
- The views expressed in this section of the Report represent a balanced summary of the responses given by stakeholders. In some cases, they reflect the views of the individual concerned, rather than the official policy of their employer/organisation.

# Views of Council Officers in the Study Areas

The following section presents Officers' views about the accommodation needs of the Gypsy and Traveller and Travelling Showpeople in their areas.

#### **Accommodation Needs**

- Since the last GTAA, a permanent site with 12 pitches has been built next to the transit site at Horsdean. All 12 pitches at the permanent site are occupied.
- 5.10 It was suggested that the permanent site has helped provide adequate provision in Brighton & Hove and the current need is being met. There has been a considerable fall in the number of unauthorised encampments with the construction of the permanent site being an indicator of adequate provision. Many of the households that were traditionally located on pieces of land in and around Brighton are now permanently housed on the public site. This has also meant that there is now more transit provision available. As a result, Travellers can be directed from pieces of land, parks and open spaces in Brighton & Hove onto transit sites.
- The public transit site is said to be more than adequate to meet current need as the average occupancy of the 21 pitches is relatively low, apart from during the summer months. With regard to the facilities provided on-site, one officer thought the transit site was adequate in all areas, apart from the need for a playground.
- The location of the current sites in Brighton & Hove was thought to be a concern. Specifically, having the transit and permanent sites adjacent to each other was suggested to be causing difficulties for households living on both sites. Regarding those living on the permanent site, they are reportedly unhappy and left feeling unsettled due to there being no consistency relating to the households who arrive on the transit site. However, it was also noted that there is little option available to Brighton & Hove in relation to where the sites could alternatively be housed.
- Many Travellers were thought to be recognising their children's need to education. While secondary school attendance was noted as being a traditionally under-utilised resource, the occupants of the permanent site in Brighton were praised for their willingness to send their children to primary school. Conversely, the occupants on the transit site have difficulty in getting their children access to schooling and health visits, such as the dentist, due to the referral process hampering quick access. This is also not helped by the fact that transit occupiers often move frequently, and referrals do not get followed up. However, a fast-track process is available for speech therapy.
- The schools that are near sites generally prioritise for the children who are living on the transit and permanent sites, with efforts made to distribute families evenly.
- Bus services were seen as inadequate for both the permanent and transit site. The location is close to the A27 but there is no bus service from there. The nearest access is in Patcham. This results in difficulties for Travellers in accessing transportation for purposes of accessing education and health services.

## Short-term Encampments and Transit Provision

The number of unauthorised encampments was said to have dropped dramatically over recent years, with the numbers of encampments only becoming an issue when the transit site was closed during the construction of the permanent site. However, it was also highlighted that the seaside location of Brighton & Hove still means that there are always going to be a number of encampments during the summer months when people visit for a holiday.

- Due to the number of unauthorised encampments decreasing, it was said that the transit site can be used in a more proactive manner. Travellers who come into the city can now have the opportunity go onto the transit site and use the electric and water facilities. If needed, health nurses can also visit.
- <sup>5.18</sup> Construction of the permanent site, Council policy and national legislation were all thought to be primary reasons underpinning the fall in the number of encampments. Many parks and open spaces have Public Space Protection Orders which prohibit living on the land in a vehicle, and fixed penalty notices can be issued. Section 62A powers allow Travellers to be directed to a Traveller site within the local authority area if there are spaces available. A lot of Travellers were said to be aware that, if they stop on a city park on the seafront and there are pitches available, then they can be directed to a transit site. All unauthorised encampments get directed to the transit site in Brighton.
- 5.19 A group of 'Van Dwellers' (around 6-10 people) were said to be constantly moving around Brighton & Hove. These people were not believed to be ethnic Travellers or nomadic. In order to move them on, the Council use a Possession Order. This was suggested to be a time consuming and expensive process as the group never leave Brighton and bailiffs are therefore always needed. The issue is said to be on-going.
- The prized parks with open space and the South Downs National Park to the north of the city, were other reasons put forward as to why Brighton & Hove attracts Travellers, and the resulting unauthorised encampments.
- Depending on the time of year, unauthorised encampments were said to appear for either work or leisure. Those that appear in autumn and winter were thought to be more likely looking for work, utilising the easy access to London and Crawley areas. Whereas, those that appear in the summer months are more likely to be visiting for leisure.
- Favoured locations for unauthorised encampments identified were the grassland near the seafront; Hove Lawns and Black Rockland, both near the seafront; Coldean Wood; Stanmer Park; Wild Park; and Stoneham Park.
- The proactive Maternity and Health Visiting Services in Brighton & Hove were also thought to be a reason for Travellers coming into the area. It is thought that many will travel to Brighton to give birth before moving on. One of the stakeholders was aware that Brighton has a good reputation. Many of the women were said to often identify as being from Brighton and see Brighton as the place that they come back to in order to give birth.
- Schools and reasonably fast access to schooling was also identified as another reason for Travellers stopping in Brighton & Hove and the occurrence of unauthorised encampments.
- The transit provision was said to be in an area that has a high potential for air and noise pollution. Furthermore, improving the facilities on the transit site was highlighted as being an immediate priority.

# Cross Border Issues and Meeting the Duty to Cooperate

5.26 No specific cross-boundary issues were identified.

- <sup>5.27</sup> Brighton & Hove comply with their Duty to Cooperate. This is evidenced through work with their neighbouring authorities over Traveller issues. There was said to be regular meetings with partners in East and West Sussex and a small amount of contact with local authorities in Surrey.
- One officer also stated that Brighton & Hove liaise with West Sussex and East Sussex around families that are looking for sites. As transit pitches are by law limited to three months, neighbouring authorities are often asked if they have any spaces to accommodate.

#### **Future Priorities and Further Issues**

- Ensuring there is enough provision in the future for the children currently on the permanent site was highlighted as being a priority for the future. Increasing the size of the permanent site was suggested to be the best option in ensuring that future need is met.
- by using some of the land occupied by existing transit pitches, and then have several smaller or seasonal transit sites at different locations. It was believed that the proximity of the current permanent and transit sites results in the transit site never being at full capacity. Smaller camps at different locations was thought to be an option to help increase the chances of Travellers using the provision.
- A further priority was to get Traveller children into school as fast as possible and to provide a school bus. The return of the play bus that used to be available in the area was also mentioned as a related issue.
- Additional provisions such as playgrounds, continued funding for sports activities and the improving of social skills were also highlighted. Improvements in these specific areas were believed to be important in helping ensure that a progressive relationship can be formed between Travellers and wider communities.

# **Neighbouring Authorities**

# Adur and Worthing Councils

- Adur and Worthing Councils operate under a joint management structure. With regard to **overall accommodation need** in Adur and Worthing, the views of the officer interviewed were as follows:
  - » The most recent GTAA (2018), indicates a requirement for an additional 6 pitches, up to 2036.
  - » There is one public site at Withy Patch in Lancing which has 12 pitches. The GTAA 2018 indicates that the need for an additional 6 pitches (to 2016) comes from the public site at Withy Patch.
  - » The 2013/14 GTAA identified a need for an additional 4 pitches up to 2028. These additional pitches will be provided in association with the development of the New Monks Farm strategic allocation in the Adur Local Plan. This development requires the provision of new infrastructure which will necessitate the relocation of Withy Patch. The opportunity will be taken to extend the site to provide for the additional 4 pitches. It will also take the site out of Flood Zone 3. The planning application was

- approved in 2018 but is subject to a decision from MHCLG on whether to call-in the application.
- » Given the commitment in the Adur and Worthing Local Plan to relocate and extend the current public site, it was considered that, currently, there is sufficient accommodation to meet the need of Gypsies and Travellers that fall under the planning definition.
- » There are very few instances of unauthorised encampments in Adur and Worthing. Those that do occur usually appear in the summer months and do not stay for long periods. No favoured locations were identified.
- » Adur and Worthing have no agreed stopping places and any unauthorised encampments are directed to the public transit provision in Chichester District.
- » The transit site in Chichester District was thought to provide sufficient provision for the Coastal West Sussex region. The most recent Coastal West Sussex GTAA (2018) recommends that no additional transit provision is required at this time, but it was suggested that position should be monitored.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
  - » The officer interviewed felt that Adur and Worthing and all neighbouring authorities are complying with the Duty to Cooperate. This was thought to be evidenced through the joint-working efforts that have been seen in the production of joint GTAA's, in the Coastal West Sussex region since 2013.
  - » Further cross-border working highlighted concerned Gypsy and Traveller liaison officer's liaison across both East and West Sussex who meet regularly.
  - » No specific cross-border issues were identified.

#### **Horsham District Council**

- With regard to **overall accommodation need** in Horsham, the views of the officer interviewed were as follows:
  - » Since the last GTAA, Horsham have attempted to devise a Gypsy and Traveller plan, but it has not found general acceptance with refusals at committee and legal challenges to planning permissions.
  - » Current provision was felt to be working reasonably well as there is not currently much need in the area. However, need was thought to be increasing and not being met.
  - » Regarding travelling Showpeople, Since the last GTAA, Horsham have lost an appeal and therefore permission has been granted for four plots, which meets the previous identified need.
  - » Long-term tolerated unauthorised developments are located at two sites in Horsham. The owners of those sites have never put in planning applications.
  - » Horsham do not attract a great number of unauthorised encampments. Encampments that do occur are directed to the transit site at Chichester.

- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
  - » No specific cross-border issues with Brighton and Hove or any other neighbouring authorities were identified.
  - » Most neighbouring authorities were believed to be meeting their respective Gypsy and Traveller need. However, authorities located to the south of Horsham were believed to be experiencing difficulties meeting their need. It was thought that the locations are hampered by their proximity to the sea and the South Downs National Park. Brighton was named as a specific example.
  - » Horsham are complying with the Duty to Cooperate. They have appeared at numerous meetings over recent months with all their neighbouring authorities.
  - » Neighbouring authorities were also felt to be complying with their Duty to Cooperate.

#### Lewes and Fastbourne Councils

- Lewes and Eastbourne Councils also operate under a joint management structure. With regard to **overall accommodation need** in Lewes and Eastbourne, the views of the officer interviewed were as follows:
  - » Lewes and Eastbourne have a planning policy in place that states what is needed in the districts. There was a need in Lewes for 5 permanent pitches and there is a current Local Plan at examination which is proposing the allocation of a site for the delivery of 5 pitches.
  - » There is a transit site in Lewes with around 8 pitches but no permanent pitches. There are permanent pitches in Lewes district, but they are within the SDNP.
  - » It was thought that the current provision was working adequately.
  - » Unauthorised encampments over the past year were highlighted as being located around Newhaven and Ringmer. However, unauthorised encampments were not regarded as a serious concern and those in the camps were just passing through.
  - » In regard to enforcement of unauthorised camps, it was said that they are moved to the transit site.
  - » No specific instances of overcrowding or concealed households were identified.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
  - » As Lewes and Eastbourne districts are split between the SDNPA there are some cross-boundary issues. Specifically, highlighted was the requirement of 13 pitches for Lewes district, 8 inside the SDNP and 5 outside the park. The national park was said to have given permission for 7, while Lewes and Eastbourne have permission for 5. This means that there is an outstanding cross-boundary need within the district for 1 pitch.

- » It was said that Brighton & Hove have asked Lewes and Eastbourne for help in meeting their unmet need. However, Lewes and Eastbourne were not able to accommodate at the time of asking. The stakeholder did suggest that there is potentially some capacity in Wealden as they offered to meet the shortfall of Lewes and Eastbourne.
- The officer interviewed stated that Lewes and Eastbourne are working under the Duty to Cooperate regarding Gypsy and Traveller issues. The officer also stated that neighbouring authorities were complying in the same manner. All parties were said to work closely with the county council liaison team for any unauthorised encampments and any planning policy information needed to support planning policies.
- » Joint working was said to be successful. Everyone was said to had completed the GTAA together and have since been working well together on the issue.

#### Mid Sussex District Council

- With regard to **overall accommodation need** in Mid Sussex, the views of the officer interviewed were as follows:
  - » Since the last GTAA was undertaken, the District Plan has been adopted (March 2018). The policies within the plan sets the framework to meet the need for Gypsies, Travellers and Travelling Showpeople.
  - » The District Plan makes provision for the allocation of pitches within the strategic allocations to the north of Burgess Hill (DP9), Pease Pottage (DP10) and at Clayton Mills, Hassocks (DP11). This identified need can also be met by the provision of an equivalent financial contribution towards the off-site provision of pitches if it can be demonstrated that suitable, available and an achievable site (or sites) can be provided within an appropriate timescale.
  - » Mid Sussex District Council Property Team has submitted a planning application, as joint landowner, for the provision of 13 pitches (DM/18/3525). This planning application has yet to determined.
  - » Mid Sussex do not have many unauthorised encampments on an annual basis. Most encampments that do occur usually appear during the summer months.
  - » The encampments do not stay for long periods and were said to be mainly stopping to visiting family in the area.
  - » No favoured stopping locations were identified.
  - » There are no transit sites in Mid Sussex. Travellers are directed to is the site in Chichester which is managed by the County Council on behalf of all the districts and Boroughs in the county.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
  - » It was noted that Brighton & Hove City Council and Lewes and Eastbourne District Councils, respectively, are unable to meet their identified need. Mid Sussex have

- recently confirmed that they are unable to help the meet that unmet Gipsy and Traveller need.
- » Generally, it was felt that cross-border working is proceeding well, and all areas are complying with the Duty to Cooperate.

#### South Downs National Park (SDNP)

- With regard to **overall accommodation need** in South Downs National Park, the views of the officer interviewed were as follows:
  - » South Downs National Park (SDNP) were said to be in an unusual position because they are made up of parts of a number of local and county councils. According to local planning evidence, SDNP consists of parts of 12 other local authorities, meaning SDNP covers a very large geographical area, spread out over four housing market areas.
  - » In respect to Gypsy and Travellers especially, as SDNP are spread out over a large area, rather than taking the approach of doing a comprehensive national park wide assessment, they have worked with the respective local authorities to assess the needs within certain parts of the national park. However, some of the evidence base is now considered out of date.
  - » SDNP have a Background Paper on Gypsies and Travellers which is used to form the Local Plan evidence base. SDNP also have a policy in their Local Plan which sets out their approach, although the Local Plan has not yet been adopted.
  - » The Horsdean site in Brighton & Hove site is located on the outskirts of the city and falls within SDNP. The Horsdean site has therefore been taken account of in regard to how SDNP assess the supply of pitches. However, in terms of how the site is being developed and taken forward, that was said to be very much down to Brighton & Hove.
  - » It was acknowledged by the stakeholder that the outstanding need for sites currently stands at 13 for the Brighton & Hove area, including SDNP. It was said to be the one area of the national park experiencing a struggle to meet the identified need. SDNP is therefore actively looking for additional sites to meet the need.
  - In terms of meeting the need, two sites were mentioned as potentially contributing to meeting the need. Firstly, there is the Offham Barns site, just north of Lewes. Offham Barns is an existing site of 4 pitches that has now been allocated in the South Downs Local Plan for a further four pitches. Secondly, The Pump House, Kingston Near Lewes, is a single pitch that had temporary permission. This site has also now been allocated in the South Downs Local Plan. These two sites therefore contribute 5 pitches towards meeting the identified need.
  - » Unauthorised encampments are dealt with as a civil enforcement matter. The stakeholder interviewed was not aware of many unauthorised encampments within the SDNP. It was thought that the main issues are found within the Brighton & Hove area, with those instances then dealt with by the relevant Gypsy and Traveller Liaison Teams.

- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
  - » SDNP were said to be complying with their Duty to Cooperate. They have worked closely with Brighton & Hove in terms of finding sites. The stakeholder suggested that both parties do not look to separate the need from one side or another of the boundary. The hope is that they both continue to work together in the same manner.
  - » No other specific cross-border issues were raised.

#### Other Stakeholders

#### Friends, Family and Travellers

- <sup>5.43</sup> Friends, Families and Travellers are a national charity, based in Brighton, that works on behalf of all Gypsies and Travellers. They provide advice and consultancy, promote health and wellbeing, work on research and policy, and deliver training.
  - » The stakeholder interviewed felt that the new permanent site at Horsdean has been a good resource and residential home for families.
  - » However, the stakeholder did say that there is still an unmet need in Brighton & Hove as not everybody who applied to go onto the site was allocated a pitch.
  - » The stakeholder also mentioned the possibility of there being an unmet need for New Travellers who do not meet the PTTS definition in the area.
  - » The stakeholder suggested that the permanent site should be expanded, possibly at the expense of the transit site becoming smaller.
  - » The stakeholder felt that having adjacent permanent and transit sites does not work. Planning policy, relating to the type of fencing the occupants of the permanent site are permitted to have, was suggested to possibly be a contributing factor. It was thought that residents are left feeling exposed. Having one entrance for both sites was also flagged as being a problematic issue.
  - » Having a transit site away from the permanent site and located within the city was suggested to be the best scenario.
  - The stakeholder felt that there was a need for both transit and negotiated stopping provision. The reason given was that non ethnic Travellers are not accessing the transit provision. A concern raised was that New Travellers are possibly being overlooked and that there are a significant number of new Travellers who fit the definition that are not being catered for. It was alluded to that these people are living in vehicles and consider themselves as Travellers as they have an economic purpose for their travelling, although Brighton & Hove Council do not take the same view.
  - » There are some small groups who may travel separately but will then meet back up together in Brighton. These will be known to Brighton & Hove Council and will be moved on regularly. Conversely, there are then other groups who travel solo and do not make any ties with other Travellers. Even though these individuals fit the

- Travelling definition, the PSPO legislation was said to have come down hard on these individuals and they are forced to move much faster.
- » As these New Travellers are a close-knit community, it was felt that their preference would be to have a permanent site of their own.
- » A general lack of support for New Travellers was noted.
- » It was highlighted that a number of people meeting the Traveller definition have been forced into bricks and mortar accommodation and would like to go back onto the road. However, no numbers could be given.
- » A future priority highlighted by the stakeholder interviewed was to look at the Traveller definition and focus on people from the New Traveller community.
- » It was also thought that will be an emerging need on the site at Horsdean.
- » Increase the understanding within the Traveller of how important it is to take part in the Traveller surveys. Have more political leadership on the issue.

### Survey of Travelling Communities

#### Interviews with Gypsies and Travellers

- One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- Through the desk-based research and stakeholder interviews ORS identified 1 public site and 1 public transit site. In addition, the drop-in session arranged with Friends, Families and Travellers resulted in interviews being completed with a number of households that are living on the roadside in Brighton or are established residents of Brighton who have been forced to move to other local authorities. The table below sets out the number of pitches/plots, the number of interviews that were completed, and the reasons why interviews were not completed.
- During the period between commencing the GTAA and reporting no further transient households were identified to interview other than those who were interviewed.

Figure 7 - Sites and yards visited in Brighton & Hove

Status	Pitches/Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
Horsdean	12	20	6 x doubled-up, 2 x in-migration, 1 x B&M
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
None	-	-	-
Public Transit			
Horsdean	21	5	1 x refusal, unoccupied pitches
Roadside			
Various	-	16	-
Bricks and Mortar			
Brighton	-	1	-
TSP Yards			
None	-	-	-
TOTAL	33	42	

## Interviews with Gypsies and Travellers in Bricks and Mortar and Living Roadside

Following all of the efforts that were made through arranging a drop-in session with Friends, Families and Travellers, it was possible to interview a further 17 households. These were a combination of households currently living in bricks and mortar in Brighton; households who have moved from bricks and mortar in Brighton; households living on the roadside; and households forced to move away from Brighton who have strong links to the local area. Details can be found in Chapter 7.

### Current and Future Pitch Provision

#### Introduction

- This section focuses on the additional pitch provision which is needed in the study area currently and to 2034. This includes both current unmet need and need which is likely to arise in the future<sup>6</sup>. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficultly in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- This section concentrates not only upon the total additional provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

#### **New Household Formation Rates**

- Nationally, a household formation and growth rate of 3.00% net per annum<sup>7</sup> has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix F**.
- Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic so the only proper way to project future population and household growth is through demographic analysis.
- The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

<sup>&</sup>lt;sup>6</sup> See Paragraphs 3.41 and 3.42 for details of components on current and future need.

<sup>&</sup>lt;sup>7</sup> Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

- The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.
- This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

Another more recent was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- In addition, the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice in December 2017. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit.
- ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.

- Overall, the household growth rate used for the assessment of future needs has been informed by local evidence. This demographic evidence has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status).
- In certain circumstances where the numbers of households and children are low it may not be appropriate to apply a percentage rate for new household formation. In these cases, a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- Overall new household formation has also been adjusted to take account of teenagers in need of a pitch in the next 5 years who have already been identified as components of need. This will eliminate any double counting in the assessment of need.

#### Breakdown by 5 Year Bands

In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5-year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time.

#### Applying the Planning Definition

- The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition, in that they were able to provide information during the household interview that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence when doing so or that they have ceased to travel temporarily due to education, ill health or old age, form the components of need that will form the baseline of need in the GTAA. Households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning definition has also been assessed to provide the Councils with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 7.17 The information used to assess households against the planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. Figure 8 sets out the planning status of households that were interviewed for the Brighton & Hove GTAA.

Figure 8 - Planning status of households in Brighton & Hove

Status	Meets Planning Definition	Undetermined	Does Not Meet Planning Definition
<b>Gypsies and Travellers</b>			
Public Sites	3	0	17
Public Transit Sites	3	0	2
Bricks and Mortar	1	0	0
Roadside	2	0	14
TOTAL	9	0	33

7.18 Figure 8 shows that for Gypsies and Travellers, 9 households met the planning definition of a Traveller in that ORS were able to determine that they travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily. A total of 33 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

## Interviews with Gypsies and Travellers in Bricks and Mortar and Roadside

<sup>7.19</sup> Following all of the efforts that were made, it was possible to interview 17 households living in bricks and mortar or on the roadside. A summary of households that were interviewed is set out in the table below.

Figure 9 - Summary of off-site interviews completed

Status	Meets Planning Definition	Summary
Household 1	Yes	Living in bricks and mortar in Brighton. In need of a pitch.
Household 2	No	Van Dweller in Brighton. No identified need.
Household 3	No	Formerly lived in bricks and mortar in Brighton but forced to move to a temporary pitch in another local authority. In need of a pitch.
Household 4	No	Roadside in Brighton. In need of a pitch
Household 5	Yes	Former Brighton resident. Currently roadside in another local authority. In need of a pitch.
Household 6	Yes	Roadside in Brighton. No identified need.
Household 7	No	Roadside across West Sussex. In need of a pitch.
Households 8 – 17	No	Former Brighton residents now living temporarily on private land in another local authority. All in need of a pitch.

#### Migration

- The study has also sought to address in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.
- <sup>7.21</sup> Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. Other than those households identified in Figure 9, ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to Brighton & Hove. There were a small number of households interviewed on a transit site in Chichester who expressed a wish to live in Brighton but there was no evidence of any local links to the area. Therefore, net migration to the sum of zero has been assumed for the GTAA which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions. Should any households from outside of Brighton & Hove wish to develop a new site the proposal will need to be considered by a criteria-based Local Plan Policy.

## Pitch Needs – Gypsies and Travellers that meet the Planning Definition (Brighton & Hove excluding SDNP)

There were no households identified in Brighton & Hove, or with links to Brighton & Hove that met the planning definition so there is no current or future need for additional pitches.

Figure 10 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition (2019-34)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5-year need from teenage children - Sites	0
5-year need from teenage children – Bricks and Mortar	0
Households on sites with temporary planning permission	0
In-migration/Roadside	0
New household formation	0
(No households met the Planning Definition)	
Total Future Needs	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 11 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	Iotai
	0	0	0	0

## Pitch Needs – Undetermined Gypsies and Travellers (Brighton & Hove excluding SDNP)

As it was possible to complete interviews or proxy interviews with all households there are no undetermined households.

## Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition (Brighton & Hove excluding SDNP)

- 7.24 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies. On this basis, it is evident that whilst the needs of the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs.
- There is a need for **10 additional pitches for households that did not meet the planning definition**. This is made up of in-migration from 10 households that are currently living on an unauthorised site in a neighbouring local authority but who have long-standing links to Brighton & Hove. There is no other current or future need for additional pitches.
- <sup>7.26</sup> A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

## Pitch Needs – Gypsies and Travellers that meet the Planning Definition (SDNP)

The households that met the planning definition were found on the public site, the public transit site, living in bricks and mortar (with links to the public site) and living on the roadside (with links to the public site). Analysis of the household interviews indicated that there is a current need for 1 pitch from a concealed or doubled-up household or adult, and 1 movement from bricks and mortar. The future need identified was for 1 pitch for a teenage child living on site who is in need of a pitch of their own in the next 5 years, 1 teenage child living in bricks and mortar who is in need of a pitch of their own in the next 5 years, 2 pitches for households living on the roadside (with clearly evidenced links to the public site at Horsdean), and 5 pitches as a result of new household formation, based on the demographics of the residents. Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for 11 additional pitches over the GTAA period.

Figure 12 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that met the Planning Definition (2019-34)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	1
Movement from bricks and mortar	1
Households on waiting lists for public sites	0
Total Current Need	2
Future Need	
5-year need from teenage children – Sites	1
5-year need from teenage children – Bricks and Mortar	1
Households on sites with temporary planning permission	0
In-migration/Roadside	2
New household formation	5
(Formation from household demographics)	
Total Future Needs	9
Net Pitch Need = (Current and Future Need – Total Supply)	11

Figure 13 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	Total
	6	2	3	11

In addition, there were a small number of residents that were interviewed on the transit site who have now moved away from Brighton & Hove. Whilst potential current and future need was identified from these households, discussions with the Council have concluded that they have no links to the area and should not be considered as local need.

#### Pitch Needs – Undetermined Gypsies and Travellers (SDNP)

As it was possible to complete interviews or proxy interviews with all households there are no undetermined households.

## Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition (SDNP)

- It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies. On this basis, it is evident that whilst the needs of the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.
- There is a need for **33 additional pitches for households that did not meet the planning definition**. This is made up of 5 concealed or doubled-up households or single adults; movement of 1 household from bricks and mortar; 1 household that is on the waiting list; 7 teenagers living on sites who will be in need of a pitch of their own; 3 teenagers living on the roadside who will be in need of a pitch of their own; 2 teenagers from a household on the waiting list who will be in need of a pitch of their own; 5 households from in-migration or living on the roadside; and 9 pitches from new household formation using a rate of 2.00% derived from the household demographics.
- A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

#### **Travelling Showpeople Needs**

### Plot Needs – Travelling Showpeople

<sup>7.33</sup> There were no Travelling Showpeople identified living in Brighton & Hove so there is no current or future need for additional plots.

Figure 14 – Additional need for Travelling Showpeople households in Brighton & Hove that met the Planning Definition (2019-34)

Travelling Showpeople - Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private plots	0
Additional supply from pitches on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Total Current Need	0
Future Need	
5-year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	0
(No Travelling Showpeople)	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 15 – Additional need for Gypsy and Traveller households in Brighton & Hove that met the Planning Definition by 5-year periods

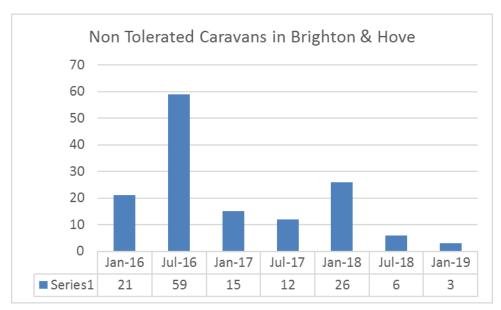
Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	Total
	0	0	0	0

#### **Transit Requirements**

when determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count, the outcomes of the stakeholder interviews, local records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

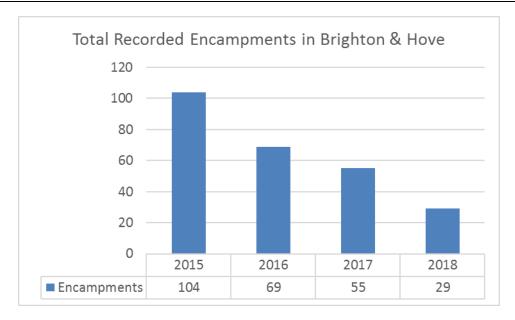
#### MHCLG Traveller Caravan Count

- Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- Data from the Traveller Caravan Count shows that there have been very low numbers of non-tolerated unauthorised caravans on land not owned by Travellers recorded in the study area in recent years. The Council have confirmed that the recent reduction is due to the re-opening of the public transit site, together with the provision of new permanent pitches.

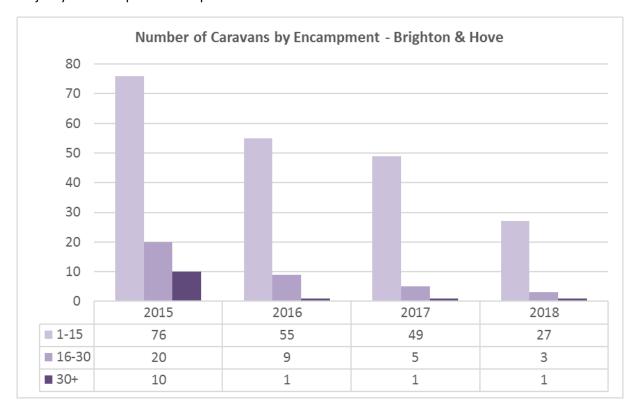


#### Stakeholder Interviews and Local Data

7.37 There is currently one public transit site in Brighton & Hove. Information from the stakeholder interviews also identified that the number of unauthorised encampments has dropped dramatically since the reopening of the public transit site, and the provision of new permanent pitches.



The Council also record the number of caravans at each encampment. This shows that the majority of encampments comprise 15 or less caravans.



The stakeholder that was interviewed confirmed that the public transit site rarely operates at full capacity apart from during the summer months and that overall there is a peak in the number of encampments during the summer months when Travellers visit the area for holidays. The stakeholder also confirmed that there is no need for any additional transit provision in Brighton & Hove. Reference was also made to a stable van dweller population that regularly move around Brighton & Hove and have shown no interest in moving onto a transit site.

#### Potential Implications of PPTS (2015)

The state of the suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. Local and national data does not suggest that this is the case in Brighton & Hove and that the reopening of the public transit site and the provision of new permanent public pitches in continuing to reduce the number of encampments in the area.

#### **Transit Recommendations**

- 7.41 Due to the public transit site it is not recommended that there is a need for any further transit provision in Brighton & Hove at this time. However, given that there are some seasonal increases in the number of unauthorised encampments during the summer months, it is recommended that the Council consider the provision of some additional short-term seasonal provision.
- The situation relating to levels of unauthorised encampments should be monitored whilst any potential changes associated with PPTS (2015) develop. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; whether they have any need or preference to settle permanently in the local area; and whether their travelling is a result of changes to PPTS (2015). This information could be collected as part of a Welfare Assessment (or similar).
- 7.43 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and could also consider management-based approaches such as negotiated stopping agreements.
- 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 agreements 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. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See www.leedsgate.co.uk for further information.

### 8. Conclusions

- This study provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the revised National Planning Policy Framework (NPPF) 2019. It also provides the evidence base which can be used to support Local Plan Policies.
- It should also be noted that as the public site at Horsdean caters for need arising primarily from Brighton & Hove outside the SDNP, then meeting the identified need is a matter to be addressed cross-boundary i.e. it should be seen as a joint responsibility of Brighton & Hove City Council and the South Downs National Park Authority.

#### Gypsies and Travellers – Brighton & Hove (excluding SDNP)

- 8.3 In summary there is a need for:
  - » No additional pitches over the GTAA period to 2034 for Gypsy and Traveller households that met the planning definition;
  - » No additional pitches for undetermined Gypsy and Traveller households that may meet the planning definition; and
  - » 10 additional pitches for Gypsy and Traveller households who did not meet the planning definition.

### Gypsies and Travellers – SDNP area of Brighton & Hove

- 8.4 In summary there is a need for:
  - » 11 additional pitches over the GTAA period to 2034 for Gypsy and Traveller households that met the planning definition;
  - » No additional pitches for undetermined Gypsy and Traveller households that may meet the planning definition; and
  - » 33 additional pitches for Gypsy and Traveller households who did not meet the planning definition.
- It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from undetermined or new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies.
- As far as the size and type of new sites is concerned, advice was published by the Government in 2008. *Designing Gypsy and Traveller sites: good practice guide* was intended to provide potential developers and existing site owners with an understanding of the design features needed to help ensure a site is successful, easy to manage and maintain, including site location, layout, size and

the services and facilities need to make it operate effectively. Whilst this was withdrawn in September 2015, it still provides valid advice. In summary it suggests that sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community.

- More recent guidance was published by the Welsh Government<sup>8</sup>. This states that the recommended number of pitches and layout of residential Local Authority Gypsy and Traveller sites should be closely linked; that smaller sites can be easier to manage and are more likely to attract compatible family units; and that new sites should comprise 20 pitches or less, other than in exceptional circumstances and where consultation and engagement have taken place with all stakeholders.
- As far as the management of new sites is concerned guidance<sup>9</sup> was published by the Government in 2009. This good practice guidance is intended to help new and existing managers maintain well-run and sustainable sites which provide a safe environment for residents and their families. It also aims to clarify the respective roles and responsibilities of management and residents alike, dealing with permanent and transit site accommodation and offering advice on everyday issues. It will also help to ensure sites work well and fulfil their part in promoting good relations with the wider community in the area.
- ORS would normally recommend that Brighton & Hove City Council and SDNP will need to carefully consider how to address any need associated with undetermined Travellers as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. However, as interviews were completed with all identified households, there is no undetermined need. In terms of Local Plan Policies, the Council and SDNP already have criteria-based policies in place (as suggested in PPTS) to address windfall need from households seeking to move to the area (in-migration) or from additional households currently living in bricks and mortar.
- An example of a robust criteria-based policy that has recently been through Examination can be found in the East Herts District Plan. This was subject to an Examination in Public between October 2017 and January 2018 followed by a period of public consultation on the Main Modifications agreed through the Examination between February and March 2018. Following this, the Inspector issued her Final Report on the Examination of the East Herts District Plan in July 2018. The policy to refer to is *Policy HOU9 Gypsies and Travellers and Travelling Showpeople*. Given that the GTAA has assumed net migration to the sum of zero, any households from outside of Brighton & Hove that meet the planning definition who wish to develop a new site will also need to be considered by a criteria-based Local Plan Policy.
- In general terms, the need for those households who do not meet the planning definition will be addressed as part of general housing need and through separate Local Plan Policies.
- <sup>8.12</sup> This approach is specifically referenced in the revised National Planning Policy Framework (February 2019). Paragraph 60 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 61 then states that 'Within this context, the size, type and tenure of housing needed for different groups in the community

<sup>&</sup>lt;sup>8</sup> Designing Gypsy and Traveller Sites – Welsh Government Guidance (2015).

<sup>&</sup>lt;sup>9</sup> Gypsy and traveller site management - good practice guide DCLG (2009).

should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

- It is recognised that the Council and SDNP already have in place adopted Local Plans that set out overall housing need. The South Downs Local Plan was adopted in July 2019 and contains Policy SD33 that addresses the needs of Gypsies and Travellers. The Council are in the process of reviewing their Local Plan and an updated Housing Needs Assessment is being prepared in parallel with this GTAA to inform the review. When this plan is reviewed, the findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to those households that do not meet the planning definition of a Traveller.
- As an example, it is useful to look at the East Hertfordshire Local Plan that was found to be sound in an Inspectors Report that was issued in July 2018. The Local Plan contains *Policy HOU10 New Park Home Sites for Non-Nomadic (i.e. households that do not meet the planning definition of a Traveller) Gypsies and Travellers and Travelling Showpeople*. This sets out that any applications for planning permission for park homes for Gypsies and Travellers and Travelling Showpeople that do not meet the planning definition must be in accordance with the NPPF and PPTS and the criteria set out in Policy HOU10, and not under the criteria set out in *Policy HOU9 Gypsies and Travellers and Travelling Showpeople*.

#### **Travelling Showpeople**

The assessment has identified a need for no additional plots for Travelling Showpeople as none were identified living in Brighton & Hove.

#### **Transit Provision**

Due to the existing public transit site in the SDNP area of Brighton & Hove it is recommended that there is no need for any additional permanent public transit provision at the time. However, given that there are some seasonal increases in the number of unauthorised encampments during the summer months, it is recommended that the Council consider the provision of some additional short-term seasonal provision.

## Summary of Need to be Addressed – Brighton & Hove (excluding SDNP)

- Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the table below sets out the likely number of pitches that will need to be addressed either as a result of the GTAA, or through the HNA and through separate Local Plan Policies.
- <sup>8.18</sup> Total need from Gypsy and Traveller households that meet the planning definition, from undetermined households, and from households that do not meet the planning definition is for

10 additional pitches. The table below breaks need down by the GTAA and HNA by taking 25% (the ORS national average for Gypsies and Travellers) of need from undetermined households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from undetermined households to the need from households that did not meet the planning definition.

Figure 16 – Additional need for Gypsy and Traveller in Brighton & Hove (excluding SDNP) households broken down by potential delivery method

Planning Status	GTAA	HNA	TOTAL
Meet Planning Definition (+ 25% undetermined)	0 (0+0)	0	0
Not meeting Planning Definition (+ 75% undetermined)	0	10 (10+0)	10
TOTAL	0	10	10

#### Summary of Need to be Addressed – Brighton & Hove (SDNP)

- Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the table below sets out the likely number of pitches that will need to be addressed either as a result of the GTAA, or through the HNA and through separate Local Plan Policies.
- Total need from Gypsy and Traveller households that meet the planning definition, from undetermined households, and from households that do not meet the planning definition is for 44 additional pitches. The table below breaks need down by the GTAA and HNA by taking 25% (the ORS national average for Gypsies and Travellers) of need from undetermined households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from undetermined households to the need from households that did not meet the planning definition.

Figure 17 – Additional need for Gypsy and Traveller in Brighton & Hove (SDNP) households broken down by potential delivery method

Planning Status	GTAA	HNA	TOTAL
Meet Planning Definition (+ 25% undetermined)	11 (11+0)	0	11
Not meeting Planning Definition (+ 75% undetermined)	0	33 (33+0)	33
TOTAL	11	33	44

## List of Figures

Figure 1 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding s	=
Figure 2 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding S that met the Planning Definition by year periods	-
Figure 3 – Additional need for Gypsy and Traveller households in SDNP area of Brighton & Hov (2019-34)	
Figure 4 – Additional need for Gypsy and Traveller households in SDNP area of Brighton & How that meet the Planning Definition by year periods	
Figure 5 – Friends, Families and Traveller Leaflet	20
Figure 6 - Total amount of provision in Brighton & Hove (April 2019)	27
Figure 7 - Sites and yards visited in Brighton & Hove	38
Figure 8 – Planning status of households in Brighton & Hove	43
Figure 9 – Summary of off-site interviews completed	43
Figure 10 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition (2019-34)	
Figure 11 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that met the Planning Definition by 5-year periods	
Figure 12 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that the Planning Definition (2019-34)	
Figure 13 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that the Planning Definition by 5-year periods	
Figure 14 – Additional need for Travelling Showpeople households in Brighton & Hove that me Planning Definition (2019-34)	
Figure 15 – Additional need for Gypsy and Traveller households in Brighton & Hove that met t Planning Definition by 5-year periods	
Figure 16 – Additional need for Gypsy and Traveller in Brighton & Hove (excluding SDNP) households broken down by potential delivery method	56
Figure 17 – Additional need for Gypsy and Traveller in Brighton & Hove (SDNP) households bro down by potential delivery method	
Figure 18 - Additional need for undetermined Gypsy and Traveller households in Brighton & H (excluding SDNP) (2019-34)	
Figure 19 – Additional need for undetermined Gypsy and Traveller households in Brighton & F (excluding SDNP) by 5-year periods	
Figure 20 - Additional need for undetermined Gypsies and Traveller households in Brighton & (SDNP) (2019-34)	
Figure 21 – Additional need for undetermined Gypsy and Traveller households in Brighton & F (SDNP) by 5-year periods	

Figure 22 - Additional need for Gypsy and Traveller households in Brighton & Hove (excluding	; •
SDNP) that did not meet the Planning Definition (2019-34)	63
Figure 23 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that did not meet the Planning Definition by 5-year periods	•
Figure 24 - Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that not meet the planning definition (2019-34)	
Figure 25 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) th	at did
not meet the Planning Definition by 5-year periods	64

# Appendix A: Glossary of Terms / Acronyms used

Amenity block/shed	A building where basic plumbing amenities
	(bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers.
	Also referred to as trailers.
Chalet	A single storey residential unit which can be
	dismantled. Sometimes referred to as mobile
	homes.
Concealed household	Households, living within other households, who
	are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number
	of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be
	occupied by Gypsies and Travellers while they
	travel.
Green Belt	A land use designation used to check the
	unrestricted sprawl of large built-up areas; prevent
	neighbouring towns from merging into one another;
	assist in safeguarding the countryside from
	encroachment; preserve the setting and special
	character of historic towns; and assist in urban
	regeneration, by encouraging the recycling of
	derelict and other urban land.
Household formation	The process where individuals form separate
	households. This is normally through adult children
	setting up their own household.
In-migration	Movement of households into a region or
	community
Local Plans	Local Authority spatial planning documents that can
	include specific policies and/or site allocations for
Out minustics	Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order
Personal planning permission	to settle in another.  A private site where the planning permission
Personal planning permission	specifies who can occupy the site and doesn't allow
	transfer of ownership.
Pitch/plot	Area of land on a site/development generally home
	to one household. Can be varying sizes and have
	varying caravan numbers. Pitches refer to Gypsy
	and Traveller sites and Plots to Travelling
	Showpeople yards.
Private site	An authorised site owned privately. Can be owner-
i i ivace site	occupied, rented or a mixture of owner-occupied
	and rented pitches.
	and rented pitches.

Site	An area of land on which Gypsies, Travellers and
	Travelling Showpeople are accommodated in
	caravans/chalets/vehicles. Can contain one or
	multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local
	authority or a Registered Housing Provider.
Temporary planning permission	A private site with planning permission for a fixed
	period of time.
Tolerated site/yard	Long-term tolerated sites or yards where
	enforcement action is not expedient, and a
	certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range
	of facilities. There is normally a limit on the length
	of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers
	and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and
	Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers
	of applications to live on a site.
Yard	A name often used by Travelling Showpeople to
	refer to a site.

GTAA	Gypsy and Traveller Accommodation Assessment
JIAA	Gypsy and Traveller Accommodation Assessment
GTANA	Gypsy and Traveller Accommodation Needs
	Assessment
HEDNA	Housing and Economic Development Needs
	Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local
	Government
ORS	Opinion Research Services
PPTS	Planning Policy for Traveller Sites (PPTS) in August
	2015
SHMA	Strategic Housing Market Assessment
TSP	Travelling Showpeople

## Appendix B: Undetermined Households

Figure 18 - Additional need for undetermined Gypsy and Traveller households in Brighton & Hove (excluding SDNP) (2019-34)

Gypsies and Travellers - Undetermined	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5-year need from teenage children	0
Households on sites with temporary planning permission	0
In-migration	0
New household formation	0
(No undetermined households)	
Total Future Needs	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 19 – Additional need for undetermined Gypsy and Traveller households in Brighton & Hove (excluding SDNP) by 5-year periods

Veers	0-5		Total	
Years	2019-24	2024-29	2029-34	Total
	0	0	0	0

Figure 20 - Additional need for undetermined Gypsies and Traveller households in Brighton & Hove (SDNP) (2019-34)

Gypsies and Travellers – Undetermined	Plots
Supply of Plots	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5-year need from teenage children	0
Households on sites with temporary planning permission	0
In-migration	0
New household formation	0
(No undetermined households)	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 21 – Additional need for undetermined Gypsy and Traveller households in Brighton & Hove (SDNP) by 5-year periods

Voore	0-5	5 6-10 11-15	Total	
Years	2019-24	2024-29	2029-34	Total
	0	0	0	0

## Appendix C: Households that did not meet the Planning Definition

Figure 22 - Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that did not meet the Planning Definition (2019-34)

Gypsies and Travellers - Not Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	10
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	10
Future Need	
5-year need from teenage children	0
5-year need for teenage children in bricks and mortar	0
Households on sites with temporary planning permission	0
In-migration	0
New household formation	0
(No new household formation)	
Total Future Needs	0
Net Pitch Need = (Current and Future Need – Total Supply)	10

Figure 23 – Additional need for Gypsy and Traveller households in Brighton & Hove (excluding SDNP) that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2019-24	2024-29	2029-34	IOlai
	10	0	0	0

Figure 24 - Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that did not meet the planning definition (2019-34)

Gypsies and Travellers - Not Meeting Planning Definition	Plots
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	5
Movement from bricks and mortar	1
Households on waiting lists for public sites	1
Total Current Need	7
Future Need	
5-year need from teenage children - Sites	7
5-year need from teenage children - Roadside	3
5-year need from teenage children – Waiting List	2
Households on sites with temporary planning permission	0
In-migration	5
New household formation	9
(Household base 41 and formation rate 2.50%)	
Total Future Needs	26
Net Plot Need = (Current and Future Need – Total Supply)	33

Figure 25 – Additional need for Gypsy and Traveller households in Brighton & Hove (SDNP) that did not meet the Planning Definition by 5-year periods

Voors	0-5	6-10	11-15	Total
Years	2019-24	2024-29	2029-34	
	24	4	5	33

# Appendix D: Site and Yard List (April 2019)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public Sites		
Horsdean Traveller Site	12	-
Private Sites with Permanent Permission		
None	-	-
Private Sites with Temporary Permission		
None	-	-
Tolerated Sites – Long-term without Planning Permission		
None	-	-
Unauthorised Developments		
None	-	-
TOTAL PITCHES	12	0
Travelling Showpeople Yards		
None	-	-
TOTAL PLOTS	0	0
Transit Sites		
Horsdean Traveller Site	21	-
TOTAL PITCHES	21	0

# Appendix E: Household Interview Questions

#### GTAA Questionnaire 2019



INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

Α		Genera	al Infor	mation		
A1	Name of planning aut	write in  isit(s):				
Α.	INTERVIEWER please write in					
A2	Date/time of site visit	s):		DD/MM/YY		TIME
~-	INTERVIEWER please writ	te in				
A3	Name of interviewer: INTERVIEWER please write	te in				
A4	Address and pitch nu INTERVIEWER please write					
<b>A5</b>	Type of accommodatio	n: INTERVIEW	ER pleas	e cross one box	only	
	Council Pri	vate rented	Private	owned Un	authoris	ed Bricks and Mortar
A6	Name of Family:	e in				
Α7	Ethnicity of Family: INTERVIEWER please cros	s one box only	/			
	Romany Gypsy	Irish Trav	eller/		-	Show Person
	New Traveller	English Tra	aveller	Welsh Gypsy		Non-Traveller
		Other (please	specify)			
A8	Number of units on th INTERVIEWER please writ					
	Mobile homes	Touring Ca	ravans	Day Roo	ms	Other (please specify)

A9			
7.0	•	ur main place o	of residence? If not where is?
	Yes	No	If not main place of residence where is (please specify)
A10			e? If you have moved in the past 5 years, where did
	Years	Months	If you have moved in the past 5 years, where did you move from? Include ALL moves
A11	_	_	r own choice or because there was no other option? If why? INTERVIEWER: Please cross one box only
	Choice	No option	If no option, why?
A12	(For example	close to schoo	household? If so why and if not why not? ols, work, healthcare, family and friends etc.)
	Yes	Please cross one bo	
			Reasons (please specify)
A13	How many sep	oarate families (	or unmarried adults live on this pitch?
	1 2	_	4 5 6 7 8 9 10
В			Demographics
B1			d 1 INTERVIEWER: Please write-in
	Person 1	Person 2	
	Sex Age	Sex A	de Sex Aue
	Complete add	itional forms fo	or each household on pitch INTERVIEWER: Please write-in
	Complete add Person 4	itional forms fo Person 5	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8
	Complete add	itional forms fo Person 5	or each household on pitch INTERVIEWER: Please write-in
С	Complete add Person 4	Person 5	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8
C C1	Complete add Person 4 Sex Age	itional forms for Person 5 Sex Accommilies or unmar	or each household on pitch INTERVIEWER: Please write-in 5 Person 6 Person 7 Person 8  age Sex Age Sex Age Sex Age
	Complete add Person 4 Sex Age  How many far their own in their	itional forms for Person 5 Sex Accommilies or unmar	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8  Ige Sex Age Sex Age Sex Age  Ccommodation Needs  Irried adults living on this pitch are in need of a pitch of Sex INTERVIEWER: Please cross one box only
	Complete add Person 4 Sex Age  How many far their own in the own in	Acceptable of the next 5 years	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8  Ige Sex Age Sex Age Sex Age  CCCOMMODATION Needs  Irried adults living on this pitch are in need of a pitch of SP INTERVIEWER: Please cross one box only  FINED AS 16+  4 5 6 7 8 9 10
	Complete add Person 4 Sex Age  How many far their own in the own in	AN ADULT IS DEFI	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8  Ige Sex Age Sex Age Sex Age  CCOMMOdation Needs  Irried adults living on this pitch are in need of a pitch of SP INTERVIEWER: Please cross one box only  FINED AS 16+
	Complete add Person 4 Sex Age  How many far their own in the own in	AN ADULT IS DEFI	or each household on pitch INTERVIEWER: Please write-in Experson 6 Person 7 Person 8 Example Sex Age Sex Age Sex Age  Commodation Needs  Experson 6 Person 7 Person 8 Experson 8 Sex Age Sex Age  Commodation Needs  Experson 6 Person 7 Person 8  Experson 6 Person 7  Experson 7  Experson 7  Experson 7  Experson 7  Expers
	Complete add Person 4 Sex Age  How many far their own in the own in	AN ADULT IS DEFI	or each household on pitch INTERVIEWER: Please write-in Person 6 Person 7 Person 8  Ige Sex Age Sex Age Sex Age  CCCOMMODATION Needs  Irried adults living on this pitch are in need of a pitch of SP INTERVIEWER: Please cross one box only  FINED AS 16+  4 5 6 7 8 9 10

C2	How many of your children will need a home of their own in the next 5 years? If they live here now, will they want to stay on this site? If not, where would they wish to move? (e.g. other site, in bricks and mortar etc.) If they do not live on this site, where do they currently live and would they want to move on to this site or another local site if they could get a pitch? INTERVIEWER: Please cross one box only
	1 2 3 4 5 6 7 8 9 10
	Other Please specify  Details (Please specify)
D	Waiting List
D1	Is anyone living here on the waiting list for a pitch in this area?  INTERVIEWER: Please cross one box only
	Yes $\square$ — Continue to D2  No $\square$ — Go to D4
D2	How many people living here are on the waiting list for a pitch in this area?  INTERVIEWER: Please cross one box only
	1 2 3 4 5 6 7 8 9 10  Other (Please specify)
	Details (Please specify)
D3	How long have they been on the waiting list? INTERVIEWER: Please cross one box only  0-3 months
	Details (Please specify)
D4	If they are not on the waiting list, do any of the people living here want to be on the waiting list? (INTERVIEWER if they do - please take their contact details)  INTERVIEWER: Please cross one box only
	1 2 3 4 5 6 7 8 9 10  No Other (Please specify)
	Details (Please specify) and take contact details)
1	

E		Future Acco	ommodation N	eeds	
E1	_ ,		ie to E2	ars? If so, why? If so, why? (please	specify)
E2	Where would you	move to? INTER	VIEWER: Please cros	s one box only	
	Another site in this area (specify where)	council area	Bricks and mortal in this area (specify where)	mortar in another council area	Other (e.g. land they own elsewhere) (Please specify)
	If you want to move public or private sit Private buy	If they own lan		be for details  e pitch or site, or	rent a pitch on a
E4	Can you afford to		ch or site? INTER	VIEWER: Please cross	s one box only
		_			
E5	Are you aware of, pitches? INTERVIEW			d have potential f	or new
		Yes		No	
	Please ask for		and/site is located	I and who owns the	e land/site?

F			Travel	ling			•
F1	How many trips, made away from INTERVIEWER: Pleas	your permanent	t base in				f your family
	0 	1	<b>2</b> □	3		4	5+ □
	↓ Go to F6a			Continue to	F2		
F2	If you or member members travelled					months,	which family
	All the family	Adult males		Other	lf o	ther, plea	se specify
F3	What were the re		_		: Please cros	ss all that a	
	Work	Holidays	Visitin	ig family □	Fairs	6	Other
	Details / sp	ecify if necessary	/. If fairs—	probe for	whether th	is is invol	ves work
F4	At what time of	vear de vou er f	amily me	mbere uei	ually trave	12 And f	or how long?
Г4	INTERVIEWER: Plea	ase cross one box o	nly		uany nave		
	All ye	ear	S	Summer		W	′inter □
			And for	how long?			
F5	Where do you or			stay whe	n they are	travellin	g?
		Private Boads	Fri	ends/	Other		
	sites trar □	nsit sites	fa	mily		If other,	please specify
	INTERVIEWE	R: Ask F6a — F8	3 <u>ONLY</u> if	F1 = 0. O	therwise,	go to F9	
F6a	Are there any re	asons why you	don't yo	u travel at	the mome	ent?	
			De	etails			
F6b	Have you or fam	nily members ev	er travell	ed? INTER	VIEWER: Ple	ease cross	one box only
	Ye				ontinue to I	F7	
F7a	When did you o		re last tra	→ GO		Nanca writa	in
rra	When did you o	i lanniy member		etails	VILVILIA. P	rease write	III
F7b	What were the re	easons for trave	lling? /N	TERVIEWER	: Please cros	ss all that a	pply
	Work	Holidays	Visitin	g family	Fairs	5	Other
	Details / sp	ecify if necessary	/. If fairs—	probe for	whether th	is is invol	ves work
	Domino / Sp	-511, 11 110 00000011)		p. 555 101			
_	© Opir	nion Re	sear	ch S	ervi	ces 2	2019

8	Why do you	u not travel	anymore?	INTERVIEWER:	Cross all box	es that apply & prot	e for details			
	Children in school	III health	Old age	Settled now	Nowhere to stop	No work opportunities	Other			
			lf	other, please s	specify					
	Details about children in school, types of ill health, or looking after relative with poor									
	Details a			types of III nea ic problems/iss			with poor			
	-	_		olan to travel	in the futur	e?				
"	NTERVIEWER	Yes	one box only		Continue to	F10				
		No			Go to G1					
	Dor	n't know			Go to G1					
10 \	When, and f	for what pu	rpose do y	ou/they plan 1	to travel?					
				Details						
-11	Is there any	/thing else <u>y</u>	you would	like to tell us	about your	travelling patte	erns?			
				Details						

Page 72

G	Any other information
G1	Any other information about this site or your accommodation needs? INTERVIEWER: Please write in
	Details (e.g. can current and future needs be met by expanding or intensifying the existing site?
	by expanding of intensitying the existing site?
G2	Site/Pitch plan? Any concerns? INTERVIEWER: Please sketch & write in
	Sketch of Site/Pitch — any concerns?
	Are any adaptations needed?
	Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently
	© Opinion Research Services 2019

Page 73

н		Bricks & Mortar Contacts
H1	Contacts for Bricks and Mo	ortar interviews? INTERVIEWER: Please write in
		Details
		Council contact?
	interview? Please note that	to contact you about any of the issues raised in this t although ORS will pass on your contact details to the tee when they will contact you?
	Yes	No □
	nem on to the Council for th	your name and telephone number so that we can pass his purpose only. Your details will only be used for this d will not be passed onto anyone else.
Res	pondent's Name	
Res	pondent's Telephone	
Res	pondent's Email	
		Interview log
I	NTERVIEWER: Please reco	rd the date and time that the interview was carried out
Date	2	
Time	e of interview	
	© Opinion I	Research Services 2019

8.1

# Appendix F: Technical Note on Household Formation and Growth Rates

# **Opinion Research Services**

### **Technical Note**

# **Gypsy and Traveller Household Formation and Growth Rates**

**August 26<sup>th</sup> 2015** 

Opinion Research Services
Spin-out company of Swansea University



As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

© Copyright August 2015

# Contents

Household Growth Rates	4
Abstract and conclusions	4
Introduction	4
Compound growth	6
Caravan counts	7
Modelling population growth	8
Household growth	12
Household dissolution rates	14
Summary conclusions	14

# **Household Growth Rates**

#### Abstract and conclusions

- National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.
- Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).
- 3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.
- 4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.
- 5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

#### Introduction

The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

- In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished gross and net growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' net growth rates of about 3% without sufficiently recognising either the range of factors impacting on the gross household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.
- For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009').
- However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying that:

The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count. [In footnote 6, page 25]

- 10. The guidance emphasises that local information and trends should always be taken into account because the gross rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a gross growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting net household growth rate that matters for planning purposes in assessing future accommodation needs.
- 11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

I can confirm that the annual growth rate figure of 3% does not represent national planning policy.

The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure,'

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

#### Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% net growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a net compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

Household Growth Rate per Annum	Time Taken for Household to Double
3.00%	23.5 years
2.75%	25.5 years
2.50%	28 years
2.25%	31 years
2.00%	35 years
1.75%	40 years
1.50%	46.5 years

<sup>14.</sup> The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

Household Growth Rate per Annum	5 years	10 years	15 years	20 years	50 years	100 years
3.00%	116	134	156	181	438	1,922
2.75%	115	131	150	172	388	1,507
2.50%	113	128	145	164	344	1,181
2.25%	112	125	140	156	304	925
2.00%	110	122	135	149	269	724
1.75%	109	119	130	141	238	567
1.50%	108	116	125	135	211	443

In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

#### Caravan counts

- 16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.
- However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.
- ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

Date	Number of caravans	5 year growth in caravans	Percentage growth over 5 years	Annual over last 5 years.
Jan 2015	20,123	1,735	9.54%	1.84%
July 2014	20,035	2,598	14.90%	2.81%
Jan 2014	19,503	1,638	9.17%	1.77%
July 2013	20,911	3,339	19.00%	3.54%
Jan 2013	19,359	1,515	8.49%	1.64%
Jul 2012	19,261	2,112	12.32%	2.35%
Jan 2012	18,746	2,135	12.85%	2.45%
Jul 2011	18,571	2,258	13.84%	2.63%
Jan 2011	18,383	2,637	16.75%	3.15%
Jul 2010	18,134	2,271	14.32%	2.71%
Jan 2010	18,370	3,001	19.53%	3.63%
Jul 2009	17,437	2,318	15.33%	2.89%
Jan 2009	17,865	3,503	24.39%	4.46%
Jul 2008	17,572	2,872	19.54%	3.63%
Jan 2008	17,844	3,895	27.92%	5.05%

Jul 2007	17,149	2,948	20.76%	3.84%
Jan 2007	16,611	2,893	21.09%	3.90%
Jul 2006	16,313	2,511	18.19%	3.40%
Jan 2006	15,746	2,352	17.56%	3.29%
Jul 2005	15,863	2,098	15.24%	2.88%
Jan 2005	15,369	1,970	14.70%	2.78%
Jul 2004	15,119	2,110	16.22%	3.05%
Jan 2004	14,362	817	6.03%	1.18%
Jul 2003	14,700			
Jan 2003	13,949			
Jul 2002	14,201			
Jan 2002	13,718			
Jul 2001	13,802			
Jan 2001	13,394			
Jul 2000	13,765			
Jan 2000	13,399			
Jan 1999	13,009			
Jul 1998	13,545			

- 19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.
- <sup>20.</sup> However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)
- There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

#### Modelling population growth

#### Introduction

<sup>22.</sup> The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

#### Migration effects

Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities — but in each case the inmigration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

#### Population profile

- <sup>24.</sup> The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
- <sup>25.</sup> The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years so the population could not possibly double in 23.5 years.

Table 4
Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9

Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

#### Birth and fertility rates

- <sup>26.</sup> The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)
- <sup>27.</sup> The total fertility rate (TFR) for the whole UK population is just below 2 which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, 'Ethnic identity and inequalities in Britain: The dynamics of diversity' by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community
- <sup>28.</sup> ORS's have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years and therefore certainly implies a net growth rate of less than 3% per annum.

#### Death rates

<sup>29.</sup> Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year — about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

- However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.
- Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

#### Modelling outputs

- If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.
- There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.
- The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

#### Household growth

- <sup>35.</sup> In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).
- 36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
- Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5
Age of Head of Household (Source: UK Census of Population 2011)

	All househo	lds in England	Gypsy and <sup>1</sup> households i	
Age of household representative	Number of households	Percentage of households	Number of households	Percentage of households
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

	All households in England		Gypsy and Traveller households in England	
Household Type	Number of households	Percentage of households	Number of households	Percentage of households
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

- <sup>39.</sup> ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).
- ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.
- <sup>41.</sup> The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

#### Household dissolution rates

<sup>42.</sup> Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

Area	Annual projected household dissolution	Number of households	Percentage
Greater London	25,000	3,266,173	0.77%
Blaenau Gwent	468.2	30,416	1.54%
Bradford	3,355	199,296	1.68%
Ceredigion	348	31,562	1.10%
Exeter, East Devon, Mid Devon, Teignbridge and Torbay	4,318	254,084	1.70%
Neath Port Talbot	1,352	57,609	2.34%
Norwich, South Norfolk and Broadland	1,626	166,464	0.98%
Suffolk Coastal	633	53,558	1.18%
Monmouthshire Newport Torfaen	1,420	137,929	1.03%

<sup>43.</sup> The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

#### Summary conclusions

- <sup>44.</sup> Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.
- <sup>45.</sup> Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

- <sup>46.</sup> The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.
- <sup>47.</sup> The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.