



**Bath & North East
Somerset Council**

Bath & North East Somerset Council

**Gypsy and Traveller Accommodation
Assessment**

Final Report

September 2021



Opinion Research Services | The Strand, Swansea SA1 1AF
Steve Jarman & Michael Bayliss
Enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

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1. Executive Summary

Introduction and Methodology

- 1.1 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 Bath & North East Somerset Council (the Council). As well as updating previous GTAAs, another key 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).
- 1.2 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 to 2034 to cover the Local Plan period to 2029 and the 15-year requirements set out in PPTS. As the Local Plan period runs from 2011 to 2029, for the purposes of the GTAA supply and demand for the period 2011-2019 has been netted to zero and the GTAA starts with a new baseline of February 2020.
- 1.3 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in Bath & North East Somerset 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. The fieldwork for the study was completed between January and February 2020 and a total of 27 interviews or proxy interviews were completed with Gypsies and Travellers and total of 5 interviews were completed with stakeholders.

Key Findings

Pitch Needs – Gypsies and Travellers

- 1.4 Overall the pitch needs for Gypsies and Travellers for the period 2020-2034 are set out below. Needs are set out for those households that met the planning definition of a Gypsy or Traveller; for those undetermined households¹ where an interview was not able to be completed (due to households not being present despite up 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.

¹See Chapter 3 for further information on undetermined households.

- 1.5 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.
- 1.6 The need arising from households that meet the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate. Need can also be met through other planning actions.
- 1.7 The Council will need to carefully consider how to address the needs 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. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households that do provide evidence that they meet the planning definition.
- 1.8 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.
- 1.9 This approach is specifically referenced in the revised National Planning Policy Framework (July 2021). Paragraph 61 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 62 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.’*
- 1.10 It is recognised that the Council are in the process of preparing a new Local Plan. 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 Gypsy and Traveller households.
- 1.11 There were 23 Gypsy or Traveller households identified in Bath & North East Somerset that met the planning definition; 3 undetermined households that may meet the planning definition; and 4 households that did not meet the planning definition.
- 1.12 There is a need for **12 pitches for households that met the planning definition to 2034**. This is made up of 4 concealed or doubled-up households or adults; 3 teenage children in need of a pitch of their own in the next five years; 1 pitch from in-migration; and 4 pitches from new household formation using a rate of 1.25% derived from the demographics of the households that were interviewed².
- 1.13 There is a need for **between 0 and 1 pitches for undetermined households**. This is made up of new household formation from a maximum of 3 households (using the ORS national formation rate of 1.50%³). If the ORS national average⁴ of 30% were applied this could result in a need for

² See Chapter 7 for further details on new household formation.

³ See Paragraphs 7.5-7.8 for further information on the ORS National Formation Rate.

⁴ Based on over 5,000 interviews completed by ORS across England.

no pitches. If the locally derived proportion of households that met the planning definition (87%) were applied this could result in a need for 1 pitch.

- 1.14 Whilst not now a requirement to include in a GTAA, there is a need for **1 pitch for households that did not meet the planning definition**. This is made up of 1 from new household formation derived from the demographics of the households that were interviewed.
- 1.15 Figure 1 summarises the identified need and Figure 2 breaks the need down for households that met the planning definition of a Traveller by 5-year periods.

Figure 1 – Need for Gypsy and Traveller households in Bath & North East Somerset (2020-34)

Status	2020-34
Meet Planning Definition	12
Undetermined	0-1
Do not meet Planning Definition	1

Figure 2 – Need for Gypsy and Traveller households in Bath & North East Somerset that meet the Planning Definition by year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	8	2	2	12

Plot Needs - Travelling Showpeople

- 1.16 Overall the plot needs for Travelling Showpeople from 2020-2034 are set out below. Needs are set out for those households that met the planning definition of a Travelling Showperson; for those undetermined households where an interview was not able to be completed 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).
- 1.17 Only the need from those households who met the planning definition and from those of the undetermined households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- 1.18 The need arising from households that met the planning definition should be addressed through yard allocation/intensification/expansion in Local Plan Policies.
- 1.19 The Council will need to carefully consider how to address the needs associated with undetermined Travelling Showpeople as it is unlikely that all of this need will have to be addressed through the provision of conditioned Travelling Showpeople plots.
- 1.20 The need for those households who did not meet the planning definition will need to be considered as part of general housing need. See Paragraphs 1.10-1.13 for further details.
- 1.21 Despite all of the efforts that were made whilst completing the GTAA it was not possible to identify any Travelling Showpeople in Bath & North East Somerset so there is no current or future need for plots. Should any Travelling Showpeople subsequently be identified in Bath & North East Somerset the Council will need to review this part of the GTAA.

Figure 3 – Need for Travelling Showpeople households in Bath & North East Somerset (2020-2034)

Status	2020-34
Meet Planning Definition	0
Undetermined	0
Do not meet Planning Definition	0

Figure 4 – Need for Travelling Showpeople households in Bath & North East Somerset that meet the Planning Definition by year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	0	0

Transit Recommendations

- 1.22 Due to low numbers of unauthorised encampments and the presence of designated transit pitches, it is recommended that there is no need for any additional transit provision in Bath & North East Somerset at this time.
- 1.23 The situation relating to levels of unauthorised encampments should be monitored. 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; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 1.24 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- 1.25 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.negotiatedstopping.co.uk for further information.
- 1.26 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities. Whilst such events are unlikely to occur in Bath & North East Somerset, the Council should still be aware of temporary arrangements that could be put in place if required.
- 1.27 During the completion of the GTAA it was identified that the designated transit pitches at Carrswood View have been unoccupied for a number of years following some incidents on the site, and that there have been no applications or requests from households wishing to use the designated transit pitches. As such, it is recommended that the Council consider redesignation the transit pitches as permanent pitches to contribute to meeting the need for permanent pitches in Bath & North East Somerset.

2. Introduction

- 2.1 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 Bath & North East Somerset. The outcomes of the study will supersede the outcomes of the previous Traveller and Travelling Showpeople Accommodation Needs Assessments completed in Bath & North East Somerset.
- 2.2 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 Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, the revised National Planning Policy Framework (NPPF) 2019 and Planning Practice Guidance (PPG) 2019.
- 2.3 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 2020 to 2034 to meet the 15-year requirements of the PPTS and the new Local Plan period to 2029. 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.
- 2.4 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).
- 2.5 The baseline date for the study is February 2020 which was when the household interviews were completed.

Definitions

- 2.6 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)

- 2.7 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)

- 2.8 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

- 2.9 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*’.
- 2.10 **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.
- 2.11 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.
- 2.12 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*.
- 2.13 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.
- 2.14 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.
- 2.16 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).
- 2.17 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.
- 2.18 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.
- 2.19 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.

- 2.20 This was further reinforced in a 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

- 2.21 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:

- » The Housing Act, 1985
- » Criminal Justice and Public Order Act, 1994
- » The Race Relations (Amendment) Act, 2000
- » Planning Policy for Traveller Sites (PPTS), 2015
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2021
- » Planning Practice Guidance⁵ (PPG), 2021

- 2.22 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.

- 2.23 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and 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.

Planning Policy for Traveller Sites (PPTS) 2015

- 2.24 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.*

⁵With particular reference to the sections on *Housing needs of different groups* (May 2021).

- » *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.*
- » *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.*

2.25 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.*

2.26 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 Duty-to-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.*

2.27 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 (2021)

- 2.28 The most recent version of the revised National Planning Policy Framework was issued in July 2021. Paragraph 61 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.
- 2.29 Paragraph 62 then states that [emphasis added] *‘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.’*
- 2.30 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.
- 2.31 In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (APP/P0240/C/18/3213822) the Inspector concluded in relation to Paragraph 61 of the July 2019 NPPF that:

It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for ‘planning definition’ travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging LP. This does not, of course mean that these gypsies should be allocated ‘bricks and mortar’ type housing. They will also need a suitable supply of caravan sites to meet their needs.

Planning for the Future White Paper (2020)

- 2.32 In August 2020 the Government published a White Paper on proposals to reform the current planning system in England. The consultation period on the White Paper ended on 29th October 2020. Whilst the White Paper does not make any references to planning for Gypsies and Travellers, the Council may need to consider the outcomes of the consultation and any subsequent changes to planning legislation in England that relate to Gypsies and Travellers.

3. Methodology

Background

- 3.1 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 changes to PPTS in August 2015, the Housing and Planning Act (2016), the revised NPPF (2021) and the revised PPG (2021). 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.
- 3.2 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.
- 3.3 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 Bedford, Cambridge, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- 3.4 An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded:
- '...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'*
- 3.5 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.'*
- 3.6 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

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

Desk-Based Review

3.8 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

3.9 Engagement was undertaken with key Council Officers and with wider stakeholders through telephone interviews. Three interviews were undertaken with Council Officers from the study area, one was completed with a representative from the Housing Association that manage the public site, and one was completed with a representative of a local charity that provides support to Traveller families.

Working Collaboratively with Neighbouring Planning Authorities

3.10 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.

- » Bristol
- » Mendip
- » North Somerset
- » South Gloucestershire
- » Wiltshire

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.

- 3.12 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.
- 3.13 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.
- 3.14 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).
- 3.16 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.

Figure 5 – Friends, Families and Traveller Leaflet

fft
Friends Families and Travellers

We are writing to you from Friends, Families and Travellers (FFT) a national charity working on behalf of Gypsies and Travellers
www.gypsy-traveller.org

MORE PITCHES PLEASE!

Councils are currently carrying out new Accommodation Needs Assessments. The assessments are being done to work out if there is a need for more Gypsy/Traveller sites in your area and it is really important that you take part in the process so that your Council identifies the true level of need for sites in your area.

Questions about travelling are particularly important.
In 2015 the Government changed the planning definition of what it means to be a 'Gypsy or Traveller' and it now reads as follows:
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.

This means that if you have completely stopped travelling, even if it is as a result of ill-health or old age or because you care for people who are too old or too ill to travel then you will be unlikely to meet the planning definition and any need you or your dependants have for a caravan site will no longer be included in the Council's assessment of its need for Gypsy/Traveller sites in your area.

Information
fft
Friends Families and Travellers

So, if you are still travelling for work, even if it is only for part the year or in order to buy and sell goods at any of the traditional horse fairs etc. then it is essential you make that clear to your Council when it assesses its need for sites in your area.

We have already seen some examples of questionnaires being used by consultants to assess needs and have some concerns about the way in which the questions have been worded and the limited space on forms to give answers.

For example, on a form produced by ORS questionnaire there is a section in the questionnaire about travelling (Section F) which could cause people to give misleading answers.

For example, one question asks 'How many trips you have made in the last 12 months'
If you answer '0' to this question then you will probably not be deemed a Gypsy or Traveller according to the new planning definition, so don't forget to include trips such as for work, looking for work, going to horse fairs etc.

Another question asks 'When did you stop travelling'
Please think carefully before answering such a question. Have you stopped travelling for good? If so then you could be judged not to be a Gypsy or Traveller in planning terms.

Another question asks 'Have you or family members ever travelled?'
If you answer 'No' to this question then you will be probably be judged not to be a Gypsy or Traveller in planning terms. So again don't forget to include trips looking for work, visiting horse fairs etc.

Finally, a question asks 'Do family members plan to travel in the future?'
Again, please bear in mind that if you answer 'No' you will be judged not to be a Gypsy or Traveller in planning terms, so think carefully about whether you are ever likely to be travelling again in the future.

fft
Friends Families and Travellers

If you want to speak to us further please do not hesitate to call
FFT on 01273 234 777 or your local Gypsy/Traveller group.

Engagement with Bricks and Mortar Households

- 3.17 The 2011 Census recorded 26 households that were identified as either Gypsies or Irish Travellers who live in a house or flat in Bath & North East Somerset.
- 3.18 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. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- 3.19 As a rule, we 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. We work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity we will put in place. Thus, we are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study.

Timing of the Fieldwork

- 3.20 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 January and February 2020 and Researchers were able to collect information on the majority of residents.

Applying the Planning Definition

- 3.21 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. The revised PPTS was issued in 2015 and a 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.
- 3.22 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.
- 3.23 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.
- 3.24 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.
- 3.25 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 (2021).

Undetermined Households

- 3.26 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 a 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.
- 3.28 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.

- 3.29 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.
- 3.30 However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 30% 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.
- 3.31 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 approximately 30% of them at a representative range of sites. Approximately 30% meet the 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.
- 3.32 This would still suggest that it is likely that only a proportion of the potential need identified from undetermined households will require conditioned Gypsy and Traveller pitches, and that the needs of the majority will be addressed through separate Local Plan Policies.
- 3.33 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

- 3.34 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 Guidance⁶

⁶ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

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 (July 2021).

- 3.35 Paragraph 62 of the revised NPPF states that [emphasis added] *‘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

- 3.36 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

- 3.37 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 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

- 3.39 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 As far as 5-year need from teenagers is concerned the household interviewers are very specific in asking whether there is a need for teenagers on existing family sites in Bath & North East Somerset. 5-year need from teenagers is usually met through additional touring caravans from the age of 13 upwards, as opposed to full additional pitches. Pairing and out-migration do not tend to occur until children are over the age of 18 and get married.

3.42 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.

3.43 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 for the period 2020-2034.

Pitch Turnover

3.44 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 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.

3.45 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.

- 3.46 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

- 3.47 GTAA studies require the identification of demand for transit provision. 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 can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

- 3.48 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.

- 3.49 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.

- 3.50 Another alternative is 'negotiated stopping'. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated 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 authority and the (temporary) residents regarding expectations on both sides.

- 3.51 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; porta-loos; sewerage disposal point and refuse disposal facilities.

- 3.52 The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- 3.53 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)⁷ 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.

⁷ Formerly the Department for Communities and Local Government (DCLG).

4. Gypsy, Traveller & Travelling Showpeople Sites & Population

Introduction

- 4.1 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 size⁸. 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.
- 4.2 It should be noted that in Bath & North East Somerset a number of sites are occupied by extended family groups and are not sub-divided into individual pitches.
- 4.3 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).
- 4.4 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.
- 4.5 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

⁸ 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 (a static caravan, park home or chalet for example) 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.

- 4.6 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 Bath & North East Somerset

- 4.7 In Bath & North East Somerset, at the base date for the GTAA, there was 1 public site with 8 permanent pitches; 4 private sites with full planning permission providing 9 pitches; 1 site with 13 pitches that is tolerated for planning purposes; and 5 public transit pitches that are currently not operational. There were no Travelling Showmen's yards identified. See **Appendix D** for further details.

Figure 6 - Total amount of provision in Bath & North East Somerset (February 2020)

Category	Sites/Yards	Pitches/Plots
Public sites	1	8
Private with permanent planning permission	4	9
Private with temporary planning permission	0	0
Tolerated sites	1	13
Unauthorised sites	0	0
Public transit provision ⁹	1	5
Travelling Showpeople yards	0	0

MHCLG Traveller Caravan Count

- 4.8 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.
- 4.9 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 fit-for-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.

⁹ These pitches are currently not in use.

5. Stakeholder Engagement

Introduction

- 5.1 To be consistent with the guidance set out in PPTS (2015) and the methodology used in other GTAA studies, ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation 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; transit provision; and cross-border issues.
- 5.2 Three interviews were undertaken with Council Officers from the study area, one was completed with a representative from the Housing Association that manage the public site, and one was completed with a representative from a local charity that provides support for Traveller households.
- 5.3 Local Authorities also 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 also interviewed a Planning Officer from four neighbouring local authorities:
- » Bristol
 - » Mendip
 - » North Somerset
 - » South Gloucestershire
 - » Wiltshire
- 5.4 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. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

Views of Key Stakeholders and Council Officers in B&NES

Accommodation Needs

- 5.5 Since the last GTAA, Bath and North East Somerset (B&NES) Council have made direct provision through developing and delivering a public site at Carrswood View. The site provides 8 permanent pitches and 5 transit pitches.
- 5.6 It was noted that the current design and occupation make-up of the Carrswood site is not conducive to maintaining ideal and peaceful living conditions. The permanent pitches are predominantly occupied by New Age Travellers and there can often be tensions between them and the traditional ethnic Travellers who have occupied the transit pitches; this has caused problems at the site in the past. As a result, the transit pitches have not been fully operational

since 2018. It was therefore suggested that the transit pitches could possibly be transferred over to become permanent pitches; with any future transit pitches not being in close proximity to the permeant pitches. It was felt that this would ultimately improve the living conditions on the site and help with the management of the site.

Short-term Encampments and Transit Provision

- 5.7 B&NES do not receive a large number of unauthorised encampments due to the area not being on a main transit route. However, the last 12 months have been busy, with encampments mainly using the park and ride at Lansdown Park, due to the lack of height restrictions. All encampments are moved on.
- 5.8 The Council cannot redirect encampments to the transit provision at Carrswood View as the pitches are currently not in use. This is as a result of damage caused by a transient encampment who were previously on the site.
- 5.9 B&NES have therefore been looking for alternative options and have considered 'stop-over sites', rather than formal transit sites. Wiltshire council have been researching the effectiveness of 'stop-over' provision and B&NES are interested to see if it is something that they should think about putting in place.

Cross Border Issues and Meeting the Duty to Cooperate

- 5.10 No cross-border issues were identified and the other authorities in the West of England were suggested to be meeting their own need.
- 5.11 B&NES are part of the 'West of England Partnership'. This has meant that all local authorities have a similar protocol with enforcement powers through working with the Avon and Somerset Constabulary.
- 5.12 B&NES also engage in cross-border joint working on planning and housing issues across the West of England. There has also been an assessment of need across the sub-region on a consistent basis, deriving individual figures for each Unitary Authority.

Future Priorities and Any Further Issues

- 5.13 The combination of placing height restrictions in all park and rides and the creation of dedicated 'stop-over' points was seen as a priority. This is in order to aid in the management of unauthorised encampments, provide the necessary provisions and also lower the cost to the Council that would come with providing dedicated transit infrastructure.
- 5.14 A future priority consistently mentioned was to avoid the grouping of different ethnicities of Travellers together on sites.

Neighbouring Local Authorities

Bristol City Council

5.15 With regard to **overall accommodation need** in Bristol, the views of the officer interviewed were as follows:

- » Since the last GTAA, GRT officials have met with the Bristol City Council Legal Team, Strategic City Planning and the Mayoral Cabinet to put forward proposals for prospective site development. The team have prepared for a public consultation regarding new site provision; however, the proposals were all unsuccessful due to funding issues in addressing the city's housing crisis.
- » There is one permanent 12-pitch site, Rose Meadow View, in the south of the city which is for Gypsies and Travellers. There is also one 20-pitch transit site, St Anthony's Park, which is in the north of the city and is for Gypsies and Travellers. Residents can stay on this site for a maximum period of thirteen weeks while passing through the city for work purposes. Provision for Showpeople consists of one 12-plot Showpeople Yard, Locks Yard, which is privately owned.
- » The Council provide services to help meet the needs of Gypsies, Travellers and Travelling Showpeople living in bricks and mortar in the area. There is both a telephonic and physical drop-in support service, a specialist youth provision, and Gypsy Romany Traveller (GRT) Voices Group where members of the community can attend.

5.16 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » Extended families of Bristol based Gypsy and Traveller communities live in the neighbouring Local Authorities (LA's). This can result in potential cross-border issues as families can look to access services across last.
- » Bristol City Council has not recently been requested to assist in making provision for Traveller sites to meet needs arising in neighbouring areas, and the City Council has not made such a request of other authorities.
- » Bristol City Council is engaged with neighbouring authorities; and the West of England Combined Authority has an engagement and coordination role. Compliance with the Duty to Cooperate is one of the matters considered at development plan examinations.

Mendip District Council

5.17 With regard to **overall accommodation need** in Mendip, the views of the officer interviewed were as follows:

- » Since the last GTAA, there has been limited progress on a Gypsy and Traveller Development Plan Document (DPD) or identification of sites.
- » There are around 35 authorised sites across the district which are mainly small private sites (1 – 5 pitches).

- » There is an acknowledged significant shortfall in provision and a need for more authorised sites in the district. Mendip's situation is unusual with a high proportion of New Age Travellers who are not seeking traditional built Traveller site provision or who actually 'travel', in the traditional sense. In recent years the picture has become more complex with evidence of encampments/unauthorised roadside caravans being taken up as alternative accommodation to housing

5.18 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 was aware of Gypsy and Traveller groups who move through Mendip from Wiltshire and to other parts of the Southwest. However, there is no collated information to know whether these are regular patterns or associated with events.
- » There are substantial joint working ventures between the Somerset authorities and a joint GTAA is expected to be re-commissioned.
- » Mendip and its neighbouring authorities were all believed to be complying well with the Duty to Cooperate.

North Somerset Council

5.19 With regard to **overall accommodation need** in North Somerset, the views of the officer interviewed were as follows:

- » Since the last GTAA, 7 additional pitches have been granted planning permission at Heathfield Park, and 29 temporary pitches within North Somerset have been made permanent, 5 at Heathfield Park and 24 at Moorland Park.
- » There still remains an outstanding need in North Somerset, as identified by the last GTAA (2017). However, that identified need has been reduced through the new permissions granted since the last GTAA. North Somerset are currently updating their GTAA in order to reflect new pitch provision and predicted need for the new Local Plan period.
- » North Somerset are aware of short-term unauthorised encampments occurring on council-owned land. Prior to Covid-19 the needs of those encampments were met on a case-by-case basis, either being tolerated or evicted, depending on circumstances. Currently, due to Covid-19, groups are tolerated in their existing location or directed to a more suitable location.

5.20 With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » No cross-border issues were identified and there is no impact on North Somerset from adjoining authorities concerning accommodation need crossing from one authority to another.
- » North Somerset would like to see improvements to cross-border joint working between authorities. This would hopefully see increased liaison with Somerset County Council and district councils in relation to unauthorised encampments. Furthermore, opportunities to share provision on existing Transit sites was

proposed to help provide an opportunity to better manage unauthorised encampments.

- » It was believed that North Somerset and all neighbouring authorities are complying with the Duty to Cooperate.

South Gloucestershire Council

5.21 With regard to **overall accommodation need** in South Gloucestershire, the views of the officer interviewed were as follows:

- » Since the last GTAA, a number of applications have been granted permission. These applications equate to 15 additional Gypsy and Traveller pitches, and 7 additional plots for Travelling Showpeople.
- » Based on the last GTAA, there is a high level of need for additional provision in South Gloucestershire. The Council are at an early stage of preparing its new Local Plan and will be opening a call for sites in the coming months, in order to identify potentially suitable land. The Council will consider the findings from the updated GTAA and consider options for whether it is able to allocate additional sites for Gypsy and Traveller and Travelling Showpeople use to meet the level of need identified.
- » The accommodation needs of Travellers currently living in bricks and mortar accommodation will be met through the same process of site allocation (through the new Local Plan) as those currently living on Gypsy and Traveller sites and Travelling Showpeople's yards.
- » Historically, South Gloucestershire has experienced high volumes of seasonal unauthorised encampments across the district. The Council will also be considering options for whether sites can potentially be allocated as new transit and/or negotiated/ temporary stopping provision, through the Local Plan.

5.22 With regard to the subject of **cross border issues** and the **Duty to Cooperate**, the views of the officer interviewed were as follows:

- » The other authorities in the West of England were believed to be meeting their own needs.
- » Through the process of preparing the Local Plan, South Gloucestershire Council are confident that, through working with their neighbouring authorities, they will satisfy the requirements of the Duty to Cooperate.

Wiltshire Council

5.23 With regard to **overall accommodation need** in Wiltshire, the views of the officer interviewed were as follows:

- » Since their last GTAA, Wiltshire Council have undertaken refurbishment of three public sites which has increased the number of available pitches.
- » A cross departmental group within Wiltshire Council, called the Traveller Reference Group, has developed a strategy and action plan that looks to engage with

Travellers on private and public sites regarding areas such as accommodation needs, health, and education, in order to improve the engagement between council services and Travellers.

- » Wiltshire Council have had their Emergency Stopping Places Strategy approved by cabinet last year and have been working hard to identify three sites in the council area that could potentially become emergency stopping sites.

^{5.24} With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:

- » Wiltshire have received requests from families residing in neighbouring authorities who wish to find a site or yard. However, no issues have been raised concerning need from neighbouring authorities impacting upon Wiltshire.
- » Wiltshire Council work closely with neighbouring authorities through information gathering and sharing concerning Travellers who cross-over borders. Close working relationships with neighbouring authorities is important to Wiltshire due to its status as a landlocked County.
- » Wiltshire and its neighbouring local authorities were all felt to be complying well with the Duty to Cooperate.

6. Survey of Travelling Communities

Interviews with Gypsies and Travellers

- 6.1 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.
- 6.2 Through the desk-based research and stakeholder interviews ORS identified 1 public site; 4 private sites; 1 site that is tolerated for planning purposes; and 1 public transit site. The table below sets out the number of pitches/plots, the number of interviews that were completed, other site notes, and the reasons why interviews were not completed. A total of 27 interviews or proxy interviews were completed representing a response rate of 90%.
- 6.3 During the period between commencing the GTAA and reporting no transient households were identified to interview.

Figure 7 – Sites and yards visited in Bath & North East Somerset

Site Status	Pitches/Plots	Interviews	Notes
Public Sites			
Carrswood View	8	5	3 x no contact
Private Sites			
Candywood Leys	1	1	-
Mill Lane	1	1	-
Orchard View	6	6	-
Poplar View	1	1	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
Newbridge Lane	13	13	-
Unauthorised Sites			
None	-	-	-
TSP			
None	-	-	-
TOTAL	30	27	

Interviews with Gypsies and Travellers in Bricks and Mortar

- 6.4 Despite all of the efforts that were made, it was not possible to identify any Gypsy or Traveller households to interview who were living in bricks and mortar.

7. Current and Future Pitch Provision

Introduction

- 7.1 This section focuses on the 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 future¹⁰. 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 difficulty 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.
- 7.2 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.
- 7.3 This section concentrates not only upon the total 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

- 7.4 Nationally, a household formation and growth rate of 3.00% net per annum¹¹ 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 pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates* in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix F**.
- 7.5 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.
- 7.6 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.
- 7.7 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

¹⁰ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

¹¹ Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

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.

- 7.8 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.

- 7.9 Another more recent decision 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.

- 7.10 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.

- 7.11 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 lawful 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.

- 7.12 Overall, the household growth rate used for the assessment of future need for households that met the planning definition has been informed by local evidence. For those households that met

the planning definition, 30% of residents were aged under 18. This demographic evidence has been used to adjust the national growth rate of 1.50% (which is based on 36% aged under 18) downwards to 1.25% based on a lower proportion of those aged under 18.

- 7.13 In certain circumstances where the numbers of households and children are low, or the population cohorts are not distributed evenly it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on evidence from other GTAAs that ORS have completed across England and Wales that indicates that 50% of households likely to form will stay in the area. Due to there being only 1 child in households that did not meet the planning definition in Bath & North East Somerset, this approach has been taken to estimating new household formation.
- 7.14 The ORS national formation rate of 1.50% has been applied to undetermined households in the absence of any demographic data for these households.
- 7.15 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 in their own right. This eliminates any double counting in the assessment of need.
- 7.16 As far 5-year need from teenagers is concerned the household interviewers are very specific in asking whether there is a need for teenagers on existing family sites in Bath & North East Somerset. 5-year need from teenagers is usually met through additional touring caravans from the age of 13 upwards, as opposed to full additional pitches. Pairing and out-migration do not tend to occur until children are over the age of 18 and get married.

Breakdown by 5 Year Bands

- 7.17 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.

Bath & North East Somerset New Local Plan Period

- 7.18 The new Local Plan period is from 2011-2029. Therefore, as this GTAA has a base date of February 2020, this does not cover the period from 2011-2019. It is therefore appropriate to net demand and supply for pitches and plots to zero for the period 2011 to 2019 and for this new assessment, which includes a new household baseline, to cover the period 2020-2029/34 to meet the Local Plan period and the 15-year requirement in the PPTS.

Applying the Planning Definition

- 7.19 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 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.

- 7.20 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. The table below sets out the planning status of households living on sites in Bath & North East Somerset. This also includes additional households identified as being in current need for a pitch.

Figure 8 – Planning status of households in Bath & North East Somerset

Status	Meets Planning Definition	Undetermined	Does Not Meet Planning Definition
Gypsies and Travellers			
Public Sites	4	3	2
Private Sites	9	-	2
Temporary Sites	-	-	-
Tolerated Sites	13	-	-
Unauthorised Sites	-	-	-
Sub-Total	26	3	4
Travelling Showpeople	-	-	-
Sub-Total	-	-	-
TOTAL	26	3	4

- 7.21 Figure 8 shows that for Gypsies and Travellers 26 households met the planning definition of a Traveller in that ORS were able to determine that household members travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily.
- 7.22 A total of 4 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.
- 7.23 It was not possible to make contact with 3 households living on the public site during the fieldwork period so these households are recorded as Undetermined for the purposes of the GTAA.

Interviews with Gypsies and Travellers in Bricks and Mortar

- 7.24 Despite all of the efforts that were made, it was not possible to interview any households living in bricks and mortar.

Migration

- 7.25 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.
- 7.26 Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified one household currently living in another local authority with a need to move back to a site in Bath & North East Somerset. ORS have found no evidence from other local studies that have been completed recently of any other households wishing to move to Bath & North East Somerset or of any residents on existing sites stating that they were planning to move away from the area. Therefore, apart from the one identified household, 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 Bath & North East Somerset 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

7.27 Analysis of the household interviews indicated that there is a need for 4 pitches from concealed or doubled-up households or adults; a need for 3 pitches for teenage children in need of a pitch of their own in the next 5 years; a need for 1 pitch due to in-migration; and a need for 4 pitches as a result new household formation, using a rate of 1.25% derived from the demographics of the residents. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller is for **12 pitches** over the GTAA period.

Figure 9 – Need for Gypsy and Traveller households in Bath & North East Somerset that met the Planning Definition (2020-34)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
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	4
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	4
Future Need	
5 year need from teenage children	3
Households on sites with temporary planning permission	0
In-migration	1
New household formation	4
<i>(Household baseline 31 and formation rate 1.25%)</i>	
Total Future Needs	8
Net Pitch Need = (Current and Future Need – Total Supply)	12

Figure 10 – Need for Gypsy and Traveller households in Bath & North East Somerset that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	8	2	2	12

Pitch Needs – Undetermined Gypsies and Travellers

7.28 Whilst it was not possible to determine the planning status of a total of 3 households as they were not on site at the time of the fieldwork, the needs of these households still need to be

recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.

- 7.29 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 7.30 However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 30% of households that have been interviewed meet the planning definition.
- 7.31 This would suggest that it is likely that only a proportion of the potential need identified from these undetermined households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 7.32 There is a need for **between 0 and 1 pitches for undetermined households**. This is made up of new household formation from a maximum of 3 households (using the ORS national formation rate of 1.50%¹²). If the ORS national average¹³ of 30% were applied this could result in a need for no pitches. If the locally derived proportion of households that met the planning definition (87%) were applied this could result in a need for 1 pitch.
- 7.33 Tables setting out the components of need for undetermined households can be found in **Appendix B**.

Pitch Needs – Gypsies and Travellers that did not meet the Planning Definition

- 7.34 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 4 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 some identified as Irish Travellers and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.
- 7.35 There is a need for **1 pitch for households that did not meet the planning definition**. This is made up of 1 from new household formation derived from the demographics of the households that were interviewed.
- 7.36 A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

¹² See Paragraphs 7.5-7.8 for further information on the ORS National Formation Rate.

¹³ Based on over 3,900 interviews completed by ORS across England.

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople

7.37 Despite all of the efforts that were made whilst completing the GTAA it was not possible to identify any Travelling Showpeople in Bath & North East Somerset so there is no current or future need for plots. Should any Travelling Showpeople subsequently be identified in Bath & North East Somerset the Council will need to review this part of the GTAA.

Figure 11 – Need for Travelling Showpeople households in Bath & North East Somerset that met the Planning Definition (2020-34)

Travelling Showpeople – Meeting Planning Definition	Plots
Supply of Pitches	
Supply from vacant plots	0
Supply from plots 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
<i>(No Travelling Showpeople)</i>	
Total Future Needs	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 12 – Need for Travelling Showpeople households in Bath & North East Somerset that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	0	0

Transit Requirements

- 7.38 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 and records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

MHCLG Traveller Caravan Count

- 7.39 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.
- 7.40 Data from the Traveller Caravan Count shows that there have been no non-tolerated unauthorised caravans on land not owned by Travellers recorded in the study area in recent years.

Stakeholder Interviews and Local Data

- 7.41 There are currently 5 designated transit pitches at the public site at Carrswood View. However, these pitches are not currently operational due to vandalism and reports of anti-social behaviour from former residents.
- 7.42 Information from the stakeholder interviews also identified that there are low levels of unauthorised encampments in Bath & North East Somerset and that those that do occur are as a result of Travellers passing through the area.

Transit Recommendations

- 7.43 Due to low numbers of unauthorised encampments and the presence of designated transit pitches, it is recommended that there is no need for any additional transit provision in Bath & North East Somerset at this time.
- 7.44 The situation relating to levels of unauthorised encampments should be monitored whilst any potential changes associated with PPTS (2015) develop – for example a potential increase in the number of households travelling to seek to meet the current planning definition.
- 7.45 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).

- 7.46 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- 7.47 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.
- 7.48 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities. Whilst such events are unlikely to occur in Bath & North East Somerset, the Council should still be aware of temporary arrangements that could be put in place if required.
- 7.49 During the completion of the GTAA it was identified that the designated transit pitches at Carrswood View have been unoccupied for a number of years following some incidents on the site, and that there have been no applications or requests from households wishing to use the designated transit pitches. As such, it is recommended that the Council consider redesignation the transit pitches as permanent pitches to contribute to meeting the need for permanent pitches in Bath & North East Somerset.

8. Conclusions

- 8.1 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 Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, the revised National Planning Policy Framework (NPPF) 2021, and the Planning Practice Guidance (PPG) 2021. It also provides the evidence base which can be used to support Local Plan Policies.
- 8.2 As a result of the efforts that were made during the fieldwork period and the very high response rate of 90%: the outcomes of the GTAA should be seen as robust, up-to-date, and accurate reflection of housing need for Gypsies, Travellers and Travelling Showpeople in Bath & North East Somerset.

Gypsies and Travellers

- 8.3 In summary there is a need for:
- » 12 pitches in Bath & North East Somerset over the GTAA period to 2034 for Gypsy and Traveller households that met the planning definition.
 - » 0-1 pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 1 pitch for Gypsy and Traveller households who did not meet the planning definition.
- 8.4 In general terms need identified in a GTAA is seen as need for additional pitches. As set out in Chapter 4 of this report, the now 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 and touring caravan, parking space for two vehicles and a small garden area. However, in Bath & North East Somerset a number of sites are occupied by extended family groups and are not sub-divided into individual pitches.
- 8.5 It is recommended that alternative approaches should be considered when seeking to address the levels of need identified in this GTAA, especially when seeking to meet the need through the intensification or expansion of existing sites.
- 8.6 The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term it is likely that the accommodation need of these individuals could be met through additional touring caravans on existing sites which are, generally, each equivalent to the provision of a pitch, as opposed to more formally set out pitches.
- 8.7 The second approach to consider is for sites occupied by larger extended family groups. Again, sites like this may be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites which are, generally, each equivalent to the provision of a pitch – as opposed to more formally set out sites with separate pitches. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.

- 8.8 It is recommended that need for households that met the PPTS planning definition is addressed through new pitch allocations and the intensification or expansion of existing sites – considering some of the alternative approaches set out above. Given that the majority of identified need comes from households living on private sites it is likely that it will need to be addressed through the provision of private pitches or sites.
- 8.9 The Council will need to carefully consider how to address any needs from undetermined households, from households seeking to move to Bath & North East Somerset (in-migration), or from households currently living in bricks and mortar. In terms of Local Plan Policies, the Council could consider the use of a criteria-based policy (as suggested in PPTS).
- 8.10 In general terms, it is the Government’s intention that the need for those households who do not fall within the PPTS planning definition should be met as part of general housing need, as all Travellers that do not meet the planning definition will have been included as part of the overall Objectively Assessed Need (OAN).
- 8.11 It is recognised that the Council is in the process of preparing a new Local Plan. 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 for Gypsies and Travellers.

Travelling Showpeople

- 8.12 Despite all of the efforts that were made whilst completing the GTAA it was not possible to identify any Travelling Showpeople in Bath & North East Somerset so there is no current or future need for plots. Should any Travelling Showpeople subsequently be identified in Bath & North East Somerset the Council will need to review this part of the GTAA.

Transit Provision

- 8.13 Due to low numbers of unauthorised encampments and the presence of designated transit pitches, it is not recommended that there is a need for any transit provision in Bath & North East Somerset at this time.
- 8.14 During the completion of the GTAA it was identified that the designated transit pitches at Carrswood View have been unoccupied for a number of years following some incidents on the site, and that there have been no applications or requests from households wishing to use the designated transit pitches. As such, it is recommended that the Council consider redesignation the transit pitches as permanent pitches to contribute to meeting the need for permanent pitches in Bath & North East Somerset.

Summary of Need to be Addressed

- 8.15 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 a HNA and through separate Local Plan Policies.
- 8.16 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 15 pitches. The table below breaks need down by the GTAA and HNA by taking 30% (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 70% of need from undetermined households to the need from households that did not meet the planning definition.

Figure 13 – Need for Gypsy and Traveller households broken down by potential delivery method

Planning Status	GTAA	HNA	TOTAL
Meet Planning Definition (+ 30% undetermined)	12 (12+0)	0	12
Not meeting Planning Definition (+ 70% undetermined)	0	2 (1+1)	2
TOTAL	12	2	114

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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 Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order to settle in another.
Personal planning permission	A private site where the 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-occupied, rented or a mixture of owner-occupied 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.
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
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 14 – Need for undetermined Gypsy and Traveller households in Bath & North East Somerset (2020-34)

Gypsies and Travellers – Undetermined	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
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	1
<i>(Household base 3 and formation rate 1.50%)</i>	
Total Future Needs	1
Net Pitch Need = (Current and Future Need – Total Supply)	1

Figure 15 – Need for undetermined Gypsy and Traveller households in Bath & North East Somerset by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	1	1

Figure 16 – Need for undetermined Travelling Showpeople households in Bath & North East Somerset (2020-34)

Travelling Showpeople – Undetermined	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from pitches on new yards	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 yards	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
<i>(No Travelling Showpeople)</i>	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 17 – Need for undetermined Travelling Showpeople households in Bath & North East Somerset by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	0	0

Appendix C: Households that did not meet the Planning Definition

Figure 18 – Need for Gypsy and Traveller households in Bath & North East Somerset that did not meet the Planning Definition (2020-34)

Gypsies and Travellers – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
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	1
<i>(Formation from household demographics)</i>	
Total Future Needs	1
Net Pitch Need = (Current and Future Need – Total Supply)	1

Figure 19 – Need for Gypsy and Traveller households in Bath & North East Somerset that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	1	1

Figure 20 – Need for Travelling Showpeople households in Bath & North East Somerset that did not meet the planning definition (2020-34)

Travelling Showpeople – Not Meeting Planning Definition	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from pitches on new yards	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 yards	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
<i>(No Travelling Showpeople)</i>	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 21 – Need for Travelling Showpeople households in Bath & North East Somerset that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	Total
	2020-24	2025-29	2030-34	
	0	0	0	0

Appendix D: Site and Yard Lists (February 2020)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Carrswood View	8	-
Private Sites with Permanent Permission		
Candywood Leys	1	-
Mill Lane	1	-
Orchard View	6	-
Poplar View	1	-
Private Sites with Temporary Permission		
None	-	-
Tolerated Sites – Long-term without Planning Permission		
Newbridge Lane	-	13
Unauthorised Sites		
None	-	-
Public Transit Pitches		
Carrswood View ¹⁴	5	-
TOTAL PITCHES	22	13
Travelling Showpeople Yards		
TOTAL PLOTS		

¹⁴ These pitches are current not in use.

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

A General Information

A1 Name of planning authority:
INTERVIEWER please write in

A2 Date/time of site visit(s):
INTERVIEWER please write in

A3 Name of interviewer:
INTERVIEWER please write in

A4 Address and pitch number:
INTERVIEWER please write in

A5 Type of accommodation: *INTERVIEWER please cross one box only*

Council	Private rented	Private owned	Unauthorised	Bricks and Mortar
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A6 Name of Family:
INTERVIEWER please write in

A7 Ethnicity of Family:
INTERVIEWER please cross one box only

Romany Gypsy	Irish Traveller	Scots Gypsy or Traveller	Show Person
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
New Traveller	English Traveller	Welsh Gypsy	Non-Traveller
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)			

A8 Number of units on the pitch:
INTERVIEWER please write in

Mobile homes	Touring Caravans	Day Rooms	Other (please specify)
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

A9 Is this site your main place of residence? If not where is it?
INTERVIEWER: Please cross one box only

Yes No

A10 How long have you lived here? If you have moved in the past 5 years, where did you move from? *INTERVIEWER: Please write in below*

Years	Months	If you have moved in the past 5 years, where did you move from? Include ALL moves
-------	--------	---

A11 Did you live here out of your own choice or because there was no other option? If there was no other option, why? *INTERVIEWER: Please cross one box only*

Choice No option

A12 Is this site suitable for your household? If so why and if not why not? (For example close to schools, work, healthcare, family and friends etc.)
INTERVIEWER: Please cross one box only

Yes No

A13 How many separate families or unmarried adults live on this pitch?
INTERVIEWER: Please cross one box only

1 2 3 4 5 6 7 8 9 10

B Demographics

B1 Demographics — Household 1 *INTERVIEWER: Please write-in*

Person 1		Person 2		Person 3	
Sex	Age	Sex	Age	Sex	Age

Complete additional forms for each household on pitch *INTERVIEWER: Please write-in*

Person 4		Person 5		Person 6		Person 7		Person 8	
Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age

C Accommodation Needs

C1 How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years? *INTERVIEWER: Please cross one box only*

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1 2 3 4 5 6 7 8 9 10

Other Please specify

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 —————> Continue to D2
 No —————> 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 3-6 months 6-12 months 1-2 years 2+ years

Other *(Please specify)*

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)

E Future Accommodation Needs											
<p>E1 Do you plan to move from this site in the next 5 years? If so, why? <i>INTERVIEWER: Please cross one box only</i></p> <p>Yes <input type="checkbox"/> <i>If yes</i> → Continue to E2 No <input type="checkbox"/> <i>If no</i> → Go to E5</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin-left: auto;"> If so, why? (please specify) </div>											
<p>E2 Where would you move to? <i>INTERVIEWER: Please cross one box only</i></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; text-align: center;"> Another site in this area <i>(specify where)</i> </td> <td style="width: 20%; text-align: center;"> A site in another council area <i>(specify where)</i> </td> <td style="width: 20%; text-align: center;"> Bricks and mortar in this area <i>(specify where)</i> </td> <td style="width: 20%; text-align: center;"> Bricks and mortar in another council area <i>(specify where)</i> </td> <td style="width: 20%; text-align: center;"> Other (e.g. land they own elsewhere) <i>(Please specify)</i> </td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> <div style="border: 1px solid black; padding: 20px; margin-top: 10px; text-align: center;"> <p>Please specify where they would move to If they own land elsewhere - probe for details</p> </div>		Another site in this area <i>(specify where)</i>	A site in another council area <i>(specify where)</i>	Bricks and mortar in this area <i>(specify where)</i>	Bricks and mortar in another council area <i>(specify where)</i>	Other (e.g. land they own elsewhere) <i>(Please specify)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Another site in this area <i>(specify where)</i>	A site in another council area <i>(specify where)</i>	Bricks and mortar in this area <i>(specify where)</i>	Bricks and mortar in another council area <i>(specify where)</i>	Other (e.g. land they own elsewhere) <i>(Please specify)</i>							
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							
<p>E3 If you want to move would you prefer to buy a private pitch or site, or rent a pitch on a public or private site? <i>INTERVIEWER: Please cross one box only</i></p> <table style="width: 100%; text-align: center;"> <tr> <td>Private buy</td> <td>Private rent</td> <td>Public rent</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		Private buy	Private rent	Public rent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Private buy	Private rent	Public rent									
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>									
<p>E4 Can you afford to buy a private pitch or site? <i>INTERVIEWER: Please cross one box only</i></p> <table style="width: 100%; text-align: center;"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		Yes	No	<input type="checkbox"/>	<input type="checkbox"/>						
Yes	No										
<input type="checkbox"/>	<input type="checkbox"/>										
<p>E5 Are you aware of, or do you own any land that could have potential for new pitches? <i>INTERVIEWER: Please cross one box only</i></p> <table style="width: 100%; text-align: center;"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <div style="border: 1px solid black; padding: 20px; margin-top: 10px; text-align: center;"> <p>Please ask for details on where land/site is located and who owns the land/site?</p> </div>		Yes	No	<input type="checkbox"/>	<input type="checkbox"/>						
Yes	No										
<input type="checkbox"/>	<input type="checkbox"/>										

F Travelling	
F1	<p>How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5+ </p> <p style="text-align: center;"> ↓ Go to F6a } Continue to F2 </p>
F2	<p>If you or members of your family have travelled in the last 12 months, which family members travelled? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> All the family Adult males Other If other, please specify </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p>
F3	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <p style="text-align: center;"> Work Holidays Visiting family Fairs Other </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;">Details / specify if necessary. If fairs—probe for whether this involves work</p>
F4	<p>At what time of year do you or family members usually travel? And for how long? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> All year Summer Winter </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;">And for how long?</p>
F5	<p>Where do you or family members usually stay when they are travelling? <i>INTERVIEWER: Please cross all boxes that apply</i></p> <p style="text-align: center;"> LA transit sites Private transit sites Roadside Friends/family Other If other, please specify </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;">INTERVIEWER: Ask F6a — F8 <u>ONLY</u> if F1 = 0. Otherwise, go to F9</p>
F6a	<p>Are there any reasons why you don't you travel at the moment?</p> <p style="border: 1px solid black; padding: 2px; text-align: center;">Details</p>
F6b	<p>Have you or family members ever travelled? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> Yes <input type="checkbox"/> —————> Continue to F7 No <input type="checkbox"/> —————> Go to F9 </p>
F7a	<p>When did you or family members last travel? <i>INTERVIEWER: Please write in</i></p> <p style="border: 1px solid black; padding: 2px; text-align: center;">Details</p>
F7b	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <p style="text-align: center;"> Work Holidays Visiting family Fairs Other </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;">Details / specify if necessary. If fairs—probe for whether this involves work</p>

F8 Why do you not travel anymore? INTERVIEWER: Cross all boxes that apply & probe for details

Children in school	Ill health	Old age	Settled now	Nowhere to stop	No work opportunities	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If other, please specify

Details about children in school, types of ill health, or looking after relative with poor health, and specific problems/issues relating to old age

F9 Do you or other family members plan to travel in the future?

INTERVIEWER: Please cross one box only

Yes	<input type="checkbox"/>	—————>	Continue to F10
No	<input type="checkbox"/>	—————>	Go to G1
Don't know	<input type="checkbox"/>	—————>	Go to G1

F10 When, and for what purpose do you/they plan to travel?

Details

F11 Is there anything else you would like to tell us about your travelling patterns?

Details

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?)

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

H Bricks & Mortar Contacts	
H1	Contacts for Bricks and Mortar interviews? <i>INTERVIEWER: Please write in</i>
<div style="border: 1px solid black; height: 150px; width: 100%; display: flex; align-items: center; justify-content: center;">Details</div>	
Council contact?	
<p>Would you like the council to contact you about any of the issues raised in this interview? Please note that although ORS will pass on your contact details to the Council we cannot guarantee when they will contact you?</p> <p><i>INTERVIEWER: Please cross one box only</i></p>	
Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<p>INTERVIEWER: Can I confirm your name and telephone number so that we can pass them on to the Council for this purpose only. Your details will only be used for this purpose and will not be passed onto anyone else.</p>	
Respondent's Name.....	<input type="text"/>
Respondent's Telephone.....	<input type="text"/>
Respondent's Email.....	<input type="text"/>
Interview log	
<p>INTERVIEWER: Please record the date and time that the interview was carried out</p>	
Date.....	<input type="text"/>
Time of interview.....	<input type="text"/>

Appendix F: Technical Note on Household Formation and Growth Rates