



Tower Hamlets

Gypsy and Traveller

Accommodation Assessment



Final Report

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1. Introduction

- 1.1 The primary objective of the Tower Hamlets Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust revised assessment of current and future need for Gypsy and Traveller accommodation in Tower Hamlets (there is no Travelling Showperson provision in Tower Hamlets) for the period 2016-2031.
- 1.2 The primary reason for completing the update 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.
- 1.3 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, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, and Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016.
- 1.4 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).
- 1.5 The baseline date for the study is **June 2016** which was when the majority of the household interviews were completed.

Definitions

- 1.6 The current '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 The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).
- 1.7 In their response to the consultation on Planning and Travellers that resulted in the revised PPTS being published, DCLG stated that the Government will, when parliamentary time allows, seek to amend primary legislation to clarify the duties of local authorities to plan for the housing needs of their residents. This is set out in the Housing and Planning Act (2016) which omits sections 225 and 226 of the 2004 Housing Act.
- 1.8 Provisions set out in the Housing and Planning Act 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 Guidance¹ related to this section of the Housing and Planning 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 new 'planning' definition of a Traveller will need to be assessed as part of

¹ "Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats." (March 2016)

the wider housing needs of the area through the SHMA process, and will form a subset of the wider need arising from households residing in caravans.

- ^{1.9} Another key issue is that there may also be Romany, Irish and Scottish Travellers who no longer travel so will not fall under the Planning or Housing definition, but who may claim that Councils need to meet their needs through the provision of culturally suitable housing.

The 'Planning Definition' in PPTS

- ^{1.10} For the purposes of the planning system, the definition was changed in the revised PPTS. The new 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)

- ^{1.11} 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

- ^{1.12} One of the most important questions that GTAAs will need to address in terms of applying the new definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term '*nomadic*'.

- ^{1.13} **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.

- 1.14 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.
- 1.15 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*.
- 1.16 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.
- 1.17 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.
- 1.18 It is ORS' understanding that the implication of these rulings in terms of applying the new definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes 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 visiting horse fairs and visiting friends or relatives. It will in the view of ORS **not cover** those who commute to work daily from a permanent place of residence.
- 1.19 It will also be the case in our view that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the new definition.
- 1.20 Households will also fall under the new 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 or health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled in the past. In addition households may also have to demonstrate that they plan to travel again in the future.

Legislation and Guidance for Gypsies and Travellers

- 1.21 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 and Planning Act, 2016
 - » Planning Policy for Traveller Sites (PPTS), 2015

- » National Planning Policy Framework (NPPF), 2012
- » Planning Practice Guidance² (PPG), 2014

^{1.22} The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the revised Planning Policy for Traveller Sites (PPTS) that was published in August 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 new ‘planning’ definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2015

^{1.23} The revised PPTS, which came into force in August 2015, sets out the direction of Government policy. As well as introducing the new definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » *Local planning authorities should make their own assessment of need for the purposes of planning.*
- » *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.*
- » *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- » *That plan-making and decision-taking should protect Green Belt from inappropriate development.*
- » *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.*

^{1.24} 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 With particular reference to the sections on Housing and Economic Development Needs Assessments

^{1.25} 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.*

^{1.26} Local Authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' 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.*

2. Methodology

Background

- 2.1 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 the PPG in 2014, PPTS in August 2015 and the Housing and Planning Act in 2016, as well as responding 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.
- 2.2 The revised PPTS published in August 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 new definition for Gypsies, Travellers and Travelling Showpeople.
- 2.3 The approach currently used by ORS has recently been considered by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:

'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'

- 2.4 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

- 2.5 A Glossary of Terms can be found in **Appendix A**.

Desk-Based Review

- 2.6 ORS collated a range of secondary data that was used to support the study. This included:
- » Census data.
 - » Caravan counts.
 - » 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

- ^{2.7} Engagement was undertaken with key Council Officers and with wider stakeholders through telephone interviews. Five interviews were undertaken with council officers from the study area. Members of the Showmen’s Guild, London Gypsy Traveller Unit and Peabody Housing were also interviewed.

Working Collaboratively with Neighbouring Planning Authorities

- ^{2.8} 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 Council set out below. Again, a detailed Topic Guide was agreed with the Council.

- » The City of London Corporation
- » Royal Borough of Greenwich
- » London Borough of Hackney
- » London Borough of Newham
- » London Borough of Southwark
- » The London Legacy Development Corporation

Survey of Travelling Communities

- ^{2.9} 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 robust information to use to assess households against the new planning definition of a Traveller multiple visits were made to households where it was not initially possible to conduct an interview because they were not in or not available at the time.
- ^{2.10} Our experience suggests that an attempt to interview households on all pitches is more robust, as opposed to a sample based approach which often leads to an under-estimate of need - an approach which is regularly challenged by the Planning Inspectorate and at planning appeals.
- ^{2.11} ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The Site Record Form that was used has been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the new household definition. All pitches and plots were visited by members of our dedicated team of experienced interviewers who work solely on our GTAA studies across England and Wales. They conducted 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 (to meet the new requirements in PPTS). Interviewers 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.

- 2.12 They 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.
- 2.13 Where it was not possible to undertake an interview, staff sought to capture as much information as possible about each pitch using a Pitch Outcome Form from sources including neighbouring residents and site management (if present).

Engagement with Bricks and Mortar Households

- 2.14 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 identified 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 and adverts on social media (including the Friends Families and Travellers Facebook group). Interviews were attempted with all contacts that were identified. Through this approach we endeavoured to do everything within our means to give households living in bricks and mortar the opportunity to make their views known to us.
- 2.15 In addition work was undertaken in partnership with the London Gypsy and Traveller Project to identify households living in bricks and mortar that were known to them and to invite them to a drop-in session where they could be interviewed.
- 2.16 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 disproportionate efforts to make them aware of the study.

Figure 1 – Bricks and Mortar Adverts





Opinion Research Services
Excellent research for the public, voluntary and private sectors

Gypsy, Traveller & Travelling Showpeople Accommodation Assessments

Opinion Research Services (ORS) is an independent research company who carry out Gypsy, Traveller and Travelling Showpeople Accommodation Assessments across the country. These assessments must be carried out by every council to inform them how many new pitches and plots will need to be provided in the future.

ORS would like to speak to Gypsies, Travellers and Travelling Showpeople who are looking to develop a site or yard or who live in bricks and mortar and would prefer to live on a site or yard in any of the following areas:

Aylesbury Vale, Basildon, Blackpool, Braintree, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Chelmsford, Cheltenham, Chiltern, Colchester, Cotswold, Daventry, East Cambridgeshire, Eastleigh, Elmbridge, Forest Heath, Forest of Dean, Fylde, Gloucester, Hambleton, Harlow, Huntingdonshire, King's Lynn and West Norfolk, Lambeth, Lewisham, Maldon, Northampton, Peterborough, Plymouth, Reigate and Banstead, Rochford, Selby, South Bucks, South Cambridgeshire, South Gloucestershire, South Hams, South Northamptonshire, Southend-on-Sea, St Edmundsbury, Stroud, Tandridge, Tendring, Tewksbury, Thurrock, Tower Hamlets, Uttlesford, Vale of Glamorgan, West Devon, Wycombe, Wyre and York

Your views are very important to us.

If you would like to speak to ORS about your accommodation needs please contact **Claire Thomas** on **01792 535337** or email claire.thomas@ors.org.uk

Timing of the Fieldwork

- 2.17 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such all of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. Fieldwork was completed between May and June 2016.

Waiting Lists

- 2.18 ORS obtained details of households on the waiting lists for the public site and undertook analysis of the waiting lists to identify households living in bricks and mortar to interview, to eliminate any double counting from doubled up or concealed households on this and other sites, and to identify those living outside of the study area.

Calculating Current and Future Need

- 2.19 The primary change introduced by PPTS (2015) in relation to the assessment of need is the change in 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 new definition. As the new PPTS has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the new definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes to meet the new definition, and stay away from their usual place of residence when doing so.
- 2.20 To identify need, PPTS 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.

Non-Travelling Households

- ^{2.21} Whilst households who do not travel fall outside the new definition of a Traveller, Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equalities Act 2010. In addition provisions set out in the new 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 Guidance³ related to this section of the Housing and Planning 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 new ‘planning’ definition of a Traveller will need to be assessed as part of the wider housing needs of the area, for example through the SHMA process, and will form a subset of the wider need arising from households residing in caravans. An assessment of need for non-travelling Travellers can be found in **Appendix B**.

Unknown Households

- ^{2.22} As well as calculating need for households that meet the new ‘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 ethnic Gypsies and Travellers who **may** meet the new 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 maximum additional need figure over and above the need identified for households that do meet the new definition.
- ^{2.23} The estimate of potential need in unknown households seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).
- ^{2.24} Should further information be made available to the Council that will allow for the new definition to be applied, these households could either form a confirmed component of need to be included in the GTAA or the SHMA.
- ^{2.25} 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 new definition based on the outcomes of households where an interview was completed.
- ^{2.26} However, data that has been collected from over 1,250 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of

³ *“Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats.”* (March 2016)

households who have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition.

- 2.27 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through the SHMA.
- 2.28 Councils will need to carefully consider how to address the needs associated with ‘Unknown’ Travellers in Local Plan policies as it is unlikely that all of it will need to be addressed through the provision of Gypsy or Traveller pitches. In terms of Local Plan policies the Councils could consider the use of a specific site allocation/protection policy for those households that do meet the new definition, together with a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that they meet the definition.

Applying the New Definition

- 2.29 When the household survey was completed the outcomes from the questions on travelling were used to determine the status of each household against the new definition in PPTS. The same definition issue applies to Travelling Showpeople as to Gypsies and Travellers.
- 2.30 As this point ORS think that households that need to be considered in the GTAA fall under one of 3 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 new definition will form the components of need to be included in the GTAA. Whilst the needs of those households that do not meet the new 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 the SHMA (see **Appendix B**).
- » Households that travel under the new definition.
 - » Households that have ceased to travel temporarily under the new definition.
 - » Households where an interview was not possible who may fall under the new definition.

Supply of Pitches

- 2.31 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).

Current Need

- 2.32 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. This is made up of the following. It is important to address issues of double counting:
- » Households on unauthorised developments for which planning permission is not expected.

- » Households on unauthorised encampments 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

^{2.33} The final stage was to identify components of future need. This includes the following four components:

- » Older teenage children in need of a pitch of their own.
- » Households living on sites with temporary planning permissions.
- » New household formation.
- » In-migration.

^{2.34} Household formation rates are often the subject of challenge at appeals or examinations. We agree with the position set by Ministers from DCLG in a Ministerial Statement in 2014 and firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on precedent. This is set out in more detail later in this report.

^{2.35} All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified in 5 year periods to 2031.

Pitch Turnover

^{2.36} 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 is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

^{2.37} In addition a recent GTAA Best Practice Guide produced by a number of 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.

^{2.38} As such, other than current vacant pitches on sites that are known to be available, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

^{2.39} PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » Transit sites
- » Temporary/Emergency stopping places
- » Temporary (seasonal) sites
- » Negotiated Stopping Agreements

^{2.40} 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 CLG Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring planning authorities and other stakeholders was also be taken into consideration when determining this element of need in the study area.

3. Gypsy, Traveller and Travelling Showpeople Sites and Population

Introduction

- ^{3.1} 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 size. 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.
- ^{3.2} 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 licensees (similar to social housing).
- ^{3.3} The alternative to public residential sites are private residential sites and yards 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.
- ^{3.4} The Gypsy, Traveller and Travelling Showpeople population also has other forms 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 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 travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- ^{3.5} 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 land owner, 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 Tower Hamlets

- ^{3.6} In Tower Hamlets there is currently only 1 public site with 19 pitches. There are no private sites; no sites with temporary planning permission; no sites that are tolerated for planning purposes; no unauthorised sites; and no private Travelling Showpeople yards. There is also no transit provision.

Figure 2 - Total amount of authorised provision in Tower Hamlets (June 2016)

Category	Sites/Yards	Pitches/Plots
Private with permanent planning permission	0	0
Private sites with temporary planning permission	0	0
Public Sites (Council and Registered Providers)	1	19
Public Transit Provision	0	0
Private Transit Provision	0	0
Travelling Showpeople Provision	0	0

Caravan Count

- ^{3.7} Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year, and reported to DCLG. This is a statistical count of the number of *caravans* on both authorised and unauthorised sites across England. With effect from July 2013, DCLG has renamed the ‘Gypsy and Traveller Caravan Count’ as the ‘Traveller Caravan Count.’
- ^{3.8} 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.

4. Stakeholder Engagement

Introduction

- 4.1 To be consistent with the guidance set out in Planning Policy for Traveller Sites and the methodology used in other GTAA studies, ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- 4.2 The aim of these interviews was to provide an understanding of: current provision and possible future need; short-term encampments and transit provision; and cross-border issues. Importantly, stakeholders who are in contact with members of the travelling community (who are in bricks and mortar or who are not known to the Council) were asked if they could inform them that the study is taking place and provide details about how they could participate in a confidential telephone interview with a member of the ORS research team.
- 4.3 Five interviews were undertaken with council officers from the study area. Members of the Showmen’s Guild, London Gypsy Traveller Unit and Peabody Housing were also interviewed.
- 4.4 As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a planning officer from six of the local authorities that neighbour the Borough.
- » The City of London Corporation
 - » Royal Borough of Greenwich
 - » London Borough of Hackney
 - » London Borough of Newham
 - » London Borough of Southwark
 - » The London Legacy Development Corporation.
- 4.5 The number of interviews undertaken is viewed to be satisfactory and consistent with similar GTANAs that ORS have completed.
- 4.6 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.
- 4.7 The first section provides the response from key stakeholders and council officers from the study area and neighbouring authorities. 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. Following this section, the response from community and representative organisations are presented.

Views of Key Stakeholders and Council Officers in Tower Hamlets

Accommodation for Gypsies and Travellers

- 4.8 There is one publically managed site for Gypsy and Travellers with 19 pitches. The original site was identified for a ventilation shaft for Crossrail tunnel, so this site was included as part of the Crossrail development, so over the past four years a new site has been built (Eleanor Street) and is nearing completion. The 19 pitches are fully occupied and no additional pitches have been provided as part of the relocation of the site.
- 4.9 There were some vacancies on the old site and a further two pitches became vacant on the new site. The Councils policy for allocating vacant pitches at the site prioritises reducing overcrowding on the site; therefore these pitches were allocated to families who were residing on overcrowded pitches. Nonetheless, there are still some pitches which are overcrowded. There is the possibility of having a small amount of land next to the present site, but this land will not be accessible from the present site.
- 4.10 There is a waiting list which is managed by the site manager. Those on the waiting list are mainly residents who are living on the present site or living on a site in West London and do not include Travellers living in bricks and mortar accommodation.
- 4.11 Whilst the Officers that were interviewed were not aware of any expressions of interest about the development of private sites in the Borough, it is known that the Council have been working with the LGTU to identify potential land in the Borough for additional sites.
- 4.12 There are no known Travelling Showpeople sites in the area.
- 4.13 Around five short-term encampments have occurred this year and these were moved on quickly. There had been no short-term encampments in the previous three years. Based on the small number of encampments the officer with the responsibility for these did not feel there is a need to provide any transit provision.
- 4.14 That said, two interviewees highlighted a recent rise in the number of encampments and they explained that they were primarily Travellers from Ireland (with Cork registration plates) who were collecting waste and rubbish and subsequently dumping this throughout the Borough. This activity was considered unusual and one interviewee felt strongly that these Travellers are not in need of accommodation but are primarily engaging in illegal activity. The majority of encampments have occurred on private (not Council owned) land.

Cross-border Issues

- 4.15 Interviewees did not raise any cross border issues.

Neighbouring Authorities

City of London Corporation

Accommodation

- 4.16 The officer representing the City of London Corporation stressed the point that the area is a financial district and the area is only one square mile which is mostly office developments. There are no Traveller sites in the area.
- 4.17 The officer did reveal that in the past the Showmen's Guild and other Gypsy and Traveller organisations have sent letters to the City of London requesting that the area considers their needs and the officer explained that in response they have explained that it is a small financial district and there are no available or proposed sites.
- 4.18 It is reported that unauthorised encampments do not occur in the area.
- 4.19 The Officer explained that the City of London is an active member of the East London Housing Partnership.

Cross Boundary Issues

- 4.20 The officer reported no cross boundary Traveller issues with Tower Hamlets or any other London Borough and explained that the Boroughs meet regularly and Gypsy and Traveller issues have not been raised. It was argued that when there are cross border issues to discuss they can call up individual planning authorities and speak to the relevant person/department.
- 4.21 Although the City of London Corporation does not provide Traveller sites the officer felt that it was making a financial contribution, through the East London Housing Partnership, to the provision of sites in other Boroughs.

Royal Borough of Greenwich

Accommodation for Gypsies and Travellers

- 4.22 The current dedicated public site for travellers at Thistlebrook provides 40 pitches (20 large and 20 medium) meaning Royal Greenwich already has one of the higher capacities in London. The site is said to be well maintained, well managed and meets the needs of the travellers on the site. There is one tolerated site at Horn Link way. The five families have lived on the site for 13 years. The authority provides them with a Portaloo toilet facility.
- 4.23 The Royal Borough has not received any expressions of interest from Gypsy, Travellers or Travelling Showpeople, which they feel suggests that there is no demand for further site provision in the area.
- 4.24 There is a waiting list of 21 applicants for the Thistlebrook site, however turnover is infrequent and it is thought that the Thistlebrook site residents do not wish to be considered for bricks and mortar.
- 4.25 Royal Greenwich does not currently have any transit pitches or agreed stopping places although there is a caravan club in Abbey Wood that gypsy and travellers are signposted to. Unauthorised encampments are dealt with by the housing service. A few encampments occur per year, for

instance, between June and August 2015 ten were moved on from parks and open spaces across Royal Greenwich.

- 4.26 Travelling Showpeople visit the area to conduct fairs and will camp on common land during their stay – this happens frequently. The Royal Borough makes no provision outside of the agreements for fairgrounds.
- 4.27 Within the Royal Greenwich Local Plan Core Strategy is a policy that seeks to protect current traveller provision. The Royal Borough is undertaking a needs assessment to determine whether there is any further need in Royal Greenwich that could be addressed through future Local Plans. In line with the London Plan and Government policy, any targets for additional pitches will be set by the Royal Borough based on identified need, working in collaboration with neighbouring London Boroughs. Any additional sites will be included in the emerging site allocations Local Plan or in a separate local plan dealing specifically with provision of gypsy and traveller sites.
- 4.28 In the future, the Royal Borough will ensure planning policies reflect the needs of gypsy and travellers within Royal Greenwich and if necessary identify sites for future accommodation.

Cross Border Issues

- 4.29 Planning Officers hold regular duty to cooperate meetings with adjoining south east local authorities, where planning policy issues including gypsy and traveller needs are discussed and where it was agreed that Boroughs would share a consultant tender brief to ensure consistency. Officers also attend quarterly London wide Association of London Borough of Planning Officers (ALBPO) meetings.
- 4.30 The Royal Borough has also been liaising with Newham and Tower Hamlets as well as adjoining south east London Boroughs regarding local plan preparation and will continue to do so. Officers have also liaised with officers representing Southwark and Bromley Councils to discuss and share best practice and managing traveller sites.

London Borough of Hackney

Accommodation

- 4.31 Hackney has five permanent public sites (27 pitches); two sites fall in the LLDC area and are managed by Hackney Homes. There is a lot of overcrowding. The standard of the facilities on the sites and management is said to be good and meet the decent homes standard. There are overcrowding issues and the recent GTAA (2014) identified that all the public sites have concealed households. There are currently 21 Gypsies or Travellers on the waiting list for the sites. The waiting list is managed by the Hackney Homes.
- 4.32 There are no private sites in the area and the Borough has not been approached by anyone interested in developing a site. There are known there are no Travelling Showpeople yards in the borough.
- 4.33 There is a high number of Irish Travellers living in bricks and mortar accommodation in this part of London and 26 interviews were completed with Travellers living in bricks and mortar in Hackney during the GTAA consultation.

- 4.34 A relatively small number of unauthorised encampments occur and the GTAA did not identify any need for transit provision.
- 4.35 A GTAA study was undertaken by ORS and completed in 2015. The study identified a need for 78 additional pitches to 2030; a proportion of the additional need was from households living in bricks and mortar accommodation. The Council is proceeding with a full review of Hackney's Local Plan and has been exploring the possibility of a site for new pitches, outside the London Borough of Hackney planning area. The Local Plan review will include a call for sites and search to identify possible development opportunities in the borough including ones that are appropriate for traveller accommodation. It will also engage with interested parties regarding the issue of gypsy and traveller needs and requirements, in light of recent changes.

Cross Border Issues

- 4.36 Hackney convened a meeting at the beginning of 2015 with planning officers representing Tower Hamlets, the city of London and Haringey to discuss the approach to cross-borough working. Hackney will continue to engage with neighbouring boroughs about planning issues including traveller accommodation. It will also advocate that the replacement London Plan addresses this strategic issue as part of the housing need for London.

The London Borough of Newham

Accommodation

- 4.37 Within the borough, there is one public site with 15 pitches. There are no vacant pitches and there is little turnover of pitches. The site has recently been refurbishment to improve the quality of accommodation.
- 4.38 The officer was not aware of anyone who had applied for site accommodation and felt that this possibly indicated that the housed traveller community in Newham is more settled and accepting of that accommodation.
- 4.39 Up to ten short – term encampments occur per year and the borough, in partnership with the police, will use Section 77 of the Criminal Justice and Public Order Act to remove unauthorised encampments as quickly as possible.
- 4.40 When asked to what extent the accommodation is meeting the need currently, the officer explained that the borough has commissioned ORS to carry out its accommodation needs assessment, and this will inform the borough of the future need, although the officer explained that the planning department have received no expressions of interest from the Gypsy, Travellers or Travelling Showpeople, which suggests that there is no demand for further site provision.
- 4.41 ORS recently completed an Accommodation Needs Assessment which identified no planning need under the new definition, however in light of ensuring the Borough has the ability to meet the cultural needs of the population under the Equalities Act, they are currently in the process of preparing a Gypsy and Traveller Accommodation Assessment in the hope of introducing a criteria based policy against which applications will be assessed for caravans and pitches should they come forward. The Borough also intends to undergo Regulation 19 stage in July 2016.
- 4.42 The GTAA will feed into the Development Plan Document in early spring next year and go onto deliver part of the Local Plan Review in 2017.

Cross Border Issues

- 4.43 The officer was not aware of any cross-border issues, and explained the borough works with the LLDC and has direct links with the neighbouring boroughs through the Strategic Market Housing Assessment work. The officer has also been in touch with neighbouring boroughs to discuss progress on their Local Plans and although the conversations were not specific to Gypsy and Travellers, the issue was discussed and the officer suggested that the issue around the lack of land is a problem shared by all its neighbours.
- 4.44 The officer explained that there little contact with Greenwich on Gypsy and Traveller issues because of the River Thames which separates the two areas, and also as they have very different issues particularly because Greenwich is considered to be a settled affluent borough with a very different population. Hackney and Tower Hamlets are thought to have similar issues and therefore the relationship with these boroughs are considered to be more important.

London Borough of Southwark

Accommodation

- 4.45 The officer referred to four public sites in Southwark comprising of 42 pitches (6, 5, 15 and 16). All of the sites have recently been refurbished and are therefore popular. There is demand for pitches from the existing community and there are occasions when there is doubling up of pitches by extended families. The demand for new pitches derives from the natural growth on existing sites.
- 4.46 Southwark have established a working group which meets on a six weekly basis. The relationship between the Gypsies and Travellers in Southwark and the wider community is felt to be improving.
- 4.47 The officer was not aware of short-term encampments which occur over the summer period. However, the officer did refer to issues regarding the accommodation needs of Travelling Showpeople when they are operating a fair in the area.

Cross Boundary Issues

- 4.48 The officer was of the view that the main priority for Southwark Council is to provide more sites to meet the needs of its existing population.
- 4.49 No specific cross border issues between Southwark and Tower Hamlets were identified by the officer and it was felt that Southwark was complying with the Duty to Cooperate.

The London Legacy Development Corporation

Accommodation

- 4.50 There are five Gypsy and Traveller pitches which are contained within 2 small sites in the Hackney Wick part of the area and managed by Hackney Homes who also maintain the waiting list for those wishing to acquire a pitch on the site. There are no sites within the LLDC part of other Boroughs (Tower Hamlets, Waltham Forest and Newham). There are no unauthorised or short-term roadside encampments.
- 4.51 There are no Travelling Showpeople residing in the area.

- 4.52 The GTAA undertaken by ORS in 2014 identified a need for an additional ten pitches during the lifetime of the plan and five of those to be delivered in the first five years
- 4.53 Since completion of the 2014 GTAA and the Local Plan in March 2015 the LLDC has allocated a site for up to 9 pitches. This is expected to meet the lower end of the five year need identified in the study. The site is within the Hackney part of the LLDC. The Borough is currently working with the site owner around the delivery of the site and, in the event the site is developed, it would possibly be managed by Hackney Homes.

Cross Border Issues

- 4.54 The Parkway site in Newham is located on the border of the LLDC and those currently residing on at the site are former residents of the Queen Elizabeth Site which was located within the LLDC area –it has been suggested that those residents should be given the opportunity to move back into the LLDC area, however, the site identification work which took place in 2014 found no opportunities for delivering a site for these residents within such a constrained boundary; as a result the London Borough of Newham is responsible for meeting the residents' accommodation need.
- 4.55 No issues around the duty to cooperate were identified by the inspector during the LLDC Local Plan examination. In addition, the officer referred to communication with the surrounding Boroughs on meeting the accommodation needs of Gypsy and Travellers and, although this has not led to any joined-up working, it has resulted in an understanding and awareness of the issues facing neighbours. The officer also reflected positively about the practice of involving neighbouring authorities in the production of Accommodation Needs Assessments and felt that it had been very useful as an information gathering exercise as well as demonstrating the duty to cooperate.
- 4.56 The idea of undertaking a joint GTAA with the surrounding Boroughs was felt to be problematic primarily because Boroughs are at different stages of their plan making process; however, the officer felt that this could be something the LLDC looks at in the future.

Views from Community Representatives

Response from the London Gypsy and Traveller Unit (LGTU)

- 4.57 ORS interviewed a representative of the LGTU, who supports Gypsies and Travellers across London to:
- » Influence decisions affecting their lives.
 - » Improve their quality of life and the opportunities available to them.
 - » Challenge the discrimination they routinely experience.
- 4.58 The representative was of the view that the Tower Hamlets is in a similar situation to other London Boroughs who have also not provided the additional 25-40 pitches which was identified in the London Gypsy and Traveller Accommodation Assessment (2008).
- 4.59 The representative was aware of the revised site allocations as a result of the Crossrail development. During this process some pitches were vacated which has dealt with some of the overcrowding and concealed households on the site. However, some of the pitches are still overcrowded and there are young people who will need a pitch of their own very soon, if not now.

- 4.60 The representative pointed out that there will also be those living in bricks and mortar accommodation whose needs are not currently being met and suggested that the census would indicate how many families would require site accommodation.
- 4.61 Therefore, the LGTU feel the current accommodation does not meet the needs of Gypsy and Travellers living within the Borough.
- 4.62 Thinking about cross border working the representative was not aware of any evidence of this and felt there needs to be more discussions between boroughs, particularly as there may be families who are living in bricks and mortar accommodation and move between boroughs. It was also felt that undertaking separate accommodation assessments fails to recognise their needs and suggested that boroughs should work on a sub-regional basis or have a coordinated approach to all the GTAA studies which have been completed thus far.
- 4.63 The representative expressed disappointment that both the Newham and Old Oak and Park Royal Development Corporation's GTAA studies concluded there was no additional need required in the Borough. The LGTU will be interested to find out how the interpretation of travelling to work will affect the outcome of the Tower Hamlets study. They have some concerns about those Gypsy and Travellers who do not meet the very narrow definition of travelling and would like to see Tower Hamlets recognise their needs.
- 4.64 Going forward the representative urged Tower Hamlets to address the needs of the Travelling community, regardless of whether they meet the planning definition or not and prioritise the identification of land to meet those needs.

Response from the Showmen's Guild (London Section)

- 4.65 As part of the stakeholder engagement ORS spoke with a representative of the Showman's Guild of Great Britain who is unaware of any sites in Tower Hamlets. The representative was not aware of any new sites or expansion of existing sites since the publication of the previous GTAA. There is one family of Showpeople who moved, by choice, to bricks and mortar in Tower Hamlets. They have no children and no need to expand. Their equipment is stored on their own land and they are said to be happy with their accommodation.
- 4.66 In the past there were many Showpeople resident in Tower Hamlets on bomb sites and in the old Docklands areas in particular, however as a result of compulsory land orders they were moved out and the majority relocated in Thurrock.
- 4.67 ORS have undertaken GTAAs across the UK and regularly consult with organisations which promote and support Travelling Showpeople. Across the country Traveling Showpeople sites are said to be overcrowded with a requirement for small expansions for family growth and most sites have reached maximum capacity.
- 4.68 There is also a lack of site accommodation in the south east of England and where sites meet the site criteria, the local planning authority should base any decision on the need for additional sites regionally not locally. The key factors should be suitability of sites, sustainability, and access to transport links and not whether or not families can prove a specific local link. The representative called for a London-wide approach.
- 4.69 The representative agreed that it is difficult to source sites which are both affordable and suitable. The Guild's view is that it is less onerous to look at existing sites and to explore whether surrounding

land can be purchased to enable a small expansion. This will have the least impact on local communities and would allow families to remain together.

^{4.70} The Guild suggested that new yards ideally contain between six to eight plots. Any smaller and this would become unsustainable as people could be left isolated when people are away, any larger and it can be intrusive and puts additional demands on local services. The average size of each plot is ½ an acre per plot and the Showmen’s Guild has designed a model design for both a smaller and larger site which is available on its website.

5. Survey of Travelling Communities

Interviews with Gypsies and Travellers

- 5.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living on the public site in the study area, and also efforts to engage with the bricks and mortar community.
- 5.2 Through the desk-based research and stakeholder interviews ORS identified just 1 public site in Tower Hamlets and interviews were completed between May and June 2016. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below sets out the number of pitches, the number of interviews that were completed, and the reasons why interviews were not completed. A summary of the overall findings from the site interviews can be found in **Appendix C**.

Figure 3 - Sites and Yards Visited in Tower Hamlets

Public Sites	Pitches/Plots	Interviews	Reasons for not completing interviews
Old Willow Close, Bow	19	15	3 refusals and 1 household not present during fieldwork period.
Private Sites			
None	-	-	
Temporary Sites			
None	-	-	
Tolerated Sites			
None	-	-	
Unauthorised Sites			
None	-	-	
Travelling Showpeople Yards			
None	-	-	

Efforts to contact bricks and mortar

- 5.3 ORS attempted to make contact with bricks and mortar by asking residents that were interviewed if they knew of any friends or family who were looking to move to a site; through the stakeholder interviews; and through adverts in the Traveller press and on social media. Letters were also sent to households on the Councils waiting list. However as a result of this no households were identified to be interviewed. In addition, despite all of the work undertaken by the LGTU, no housed Gypsies or Travellers attended the drop-in session that was arranged.

6. Current and Future Pitch Provision

Introduction

- 6.1 This section focuses on the additional pitch provision which is needed by the local authorities in the study area currently and to 2031. This includes both current unmet need and need which is likely to arise in the future. 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.
- 6.2 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.
- 6.3 This section concentrates not only upon the total additional provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New 'Planning' Definition

- 6.4 As well as assessing housing need, the revised version of PPTS now also requires a GTAA to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the new 'planning' definition of a Gypsy, Traveller or Travelling Showperson. Only households that fall within the new definition, and those who *may* meet the definition (households where an interview was not completed), will have their housing needs assessed separately from the wider population in the GTAA. The new definition now excludes those who have ceased to travel permanently.

Current and Future Pitch/Plot Needs

- 6.5 To identify need, PPTS requires an assessment of 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. The key factors in each of these elements are set out below.

New Household Formation Rates

- 6.6 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national

and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates*. The main conclusions are set out here and the full paper is in **Appendix D**.

- 6.7 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.
- 6.8 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.
- 6.9 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers.
- 6.10 ORS assessments take full account of the net local household growth rate per annum for each local authority, calculated on the basis of demographic evidence from the site surveys, and the ‘baseline’ includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, and in-/out-migration.
- 6.11 Discussions with local authorities have also considered any pitches not occupied by Gypsies and Travellers and whether these should be included or excluded from the calculations. Overall, the household growth rate used for the assessment of future needs has been informed by local evidence for each local authority. This demographic evidence has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by travelling status).
- 6.12 In certain circumstances where the numbers of households and children are low it may not be appropriate to apply a % rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- 6.13 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.

Breakdown by 5 Year Bands

- 6.14 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. 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 older 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 5 year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the New Definition

- 6.15 The outcomes from the questions in the household survey on travelling were used to determine the status of each household against the new definition in PPTS. This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the new definition. Only those households that meet the new definition, in that they were able to demonstrate that they travel for work purposes, 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 new definition have also been included as a potential additional component of need from ‘unknown’ households.
- 6.16 Information that was sought from households where an interview was completed allowed each household to be assessed against the new ‘planning’ definition of a Traveller. This 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. The table below sets out the travelling status of households living on the public site in in Tower Hamlets.

Figure 4 – Travelling Status of Households in Tower Hamlets

Site Status	Meets New Definition	Does Not Meet New Definition	Unknown
Gypsies and Travellers			
Public Sites	1	14	4
Private Sites	-	-	-
Temporary Sites	-	-	-
Tolerated Sites	-	-	-
Unauthorised Sites	-	-	-
Sub-Total	1	14	4
Travelling Showpeople			
Public Yards	-	-	-
Private Yards	-	-	-
Temporary Yards	-	-	-
Tolerated Yards	-	-	-
Unauthorised Yards	-	-	-
Sub-Total	0	0	0
TOTAL	1	14	4

- 6.17 Figure 4 shows that for Gypsies and Travellers only 1 household meets the new definition of a Traveller in that they were able to provide information demonstrating that they travel for work purposes and stay away from their usual place of residence, or have ceased to travel temporarily. A total of 14 Gypsy and Traveller households did not meet the new 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 fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the new definition.

- 6.18 The number of households where an interview was not possible are recorded as unknown. The reasons for this included households that refused to be interviewed and households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar Interviews

- 6.19 Whilst the 2011 Census identified 50 households living in bricks and mortar in Tower Hamlets who identified as a Gypsy or Irish Traveller no interviews were completed, despite all of the efforts that were made.

Pitch Needs – ‘Travelling’ Gypsies and Travellers

- 6.20 There was only one household that met the new definition. The only current or future need associated with this household is for **1 additional pitch** from an adult son who is in need of a pitch of his own. He is on the waiting list for the current site. There are no other current or future accommodation needs to include in the GTAA.

Pitch Needs – ‘Unknown’ Gypsies and Travellers

- 6.21 Whilst it was not possible to determine the travelling status of a total of 4 households as they either refused to be interviewed, or 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 ethnic Gypsies and Travellers and **may** meet the new definition as defined in PPTS.
- 6.22 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 new definition based on the outcomes of households in that local authority where an interview was completed.
- 6.23 However data that has been collected from over 1,250 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition.
- 6.24 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 6.25 Should further information be made available to the Council that will allow for the new definition to be applied to the ‘unknown’ households, the overall level of need could rise by up to 4 pitches from new household formation (this uses a base of the 4 households and a net growth rate of 1.50%⁴). Therefore additional need *could* increase by up to a further 40 pitches, plus any concealed adult households or 5 year need arising from older teenagers living in these households (if all 4 ‘unknown’

⁴ The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

itches are deemed to meet the new definition). However, as an illustration, if the national average of 10% were to be applied this could be as low as 1 additional pitch.

Waiting Lists

- 6.26 The Council have confirmed that there are 10 families on the waiting list for the public site and that 4 of these live on the site. These 4 households do not meet the new definition and have already been included as components of need as non-travelling concealed households or adults.
- 6.27 Of the other households 5 live on sites outside of Tower Hamlets and 1 has no fixed abode. Should any of these households wish to be considered for a tenancy on the public site they will have to provide information on their travelling patterns during the site allocation process as and when a pitch becomes available. This is a matter for the not a planning matter.

Travelling Showpeople Needs

- 6.28 There are no Travelling Showpeople living on yards in Tower Hamlets. Through the interview with the Showman's Guild one Showman was identified who was living in bricks and mortar but it was confirmed that his needs were being met.

Transit Sites / Temporary Stopping Places

- 6.29 There is the possibility that changes to PPTS could result in increased levels of travelling but it is not recommended that there is a need for the Council to consider any transit provision at this time – as evidence from the Caravan Count shows that there have been no unauthorised caravans recorded in recent years, and also the stakeholder interviews found there to be very low levels of encampments in the area.
- 6.30 The situation relating to levels of unauthorised encampments by households that meet the new definition of a Traveller, and occupation levels of any unauthorised roadside encampments, should however be continually monitored whilst the changes associated with the new PPTS develop, and the Council should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments.

Appendix A: Glossary of Terms

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 into or come to live in 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.
Tolerated site/yard	Long-term tolerated sites or yards where enforcement action is not expedient and a certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers of applications to live on a site.
Yard	A name often used by Travelling Showpeople to refer to a site.

Appendix B – Assessment of Need for ‘Non-Travelling’ Travellers in Tower Hamlets

It is not a requirement to include details of need from Non-Travelling Gypsies and Travellers in the GTAA. However, an assessment of this need has been made to support the Council with its SHMA.

Analysis of the household interviews for those **who do not meet the new definition** indicated that there is a need for 12 additional pitches over the 15 year period to 2031. Current need of 7 is made up of adult children living in over-crowded conditions on pitches who are in need of a pitch of their own. Future need is made up of 7 from new household formation using a formation rate of 2.00% that has been derived from the demographics of the households that were interviewed. There is also supply of 2 pitches from 1 household seeking to move to bricks and mortar and 1 household seeking to move to a site in another local authority.

Assessment of Need for ‘Non-Travelling’ Travellers in Tower Hamlets to 2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	0	-
Movement to bricks and mortar	-	1	-
Additional supply unimplemented pitches	-	0	-
Out-migration	-	1	-
Total Supply	-	2	-
Current Need			
Unauthorised developments or encampments	0	-	-
Concealed/Doubled-up households	7	-	-
Net movement from bricks and mortar	0	-	-
Total Current Need	7	-	-
Future Need			
Sites with temporary planning permission	0	-	-
Net migration	0	-	-
New household formation	7	-	-
Total Future Needs	7	-	-
Total	14	2	12

Additional Need for ‘Non-Travelling’ Households by 5 Year Periods

2016-21	2021-26	2026-31	Total
7	2	3	12

Appendix C – Overall Household Survey Findings

- 2.1 All 15 respondents live in accommodation provided by the council.
- 2.2 11 respondents identify as Irish Travellers, and 1 respondent each identify as English Traveller, Romany Gypsy, Welsh Gypsy and Scots Gypsy or Traveller.
- 2.3 Where there are fewer than 15 responses, respondents either chose not to answer a question, or were not asked a question due to being routed out as some questions were no longer applicable based on answers they have given in previous questions.
- 2.4 Most respondents have lived on their site between 5 months and 2 years while 1 respondent has lived there for 30 years. Most respondents had moved from the Eleanor street site.
- 2.5 9 respondents live on their current site because they have no option. 6 respondents live there out of choice.
- 2.6 12 respondents feel that the site they are living in is suitable for their household. 3 respondents do not find it suitable.
- 2.7 10 respondents have one separate family or unmarried adults living on their pitch, 4 respondents have two separate families living on their pitch and 1 respondent has 4 separate families or unmarried adults living on their pitch.
- 2.8 The following table shows the demographics of each person in the households interviewed.

Figure 1 - Demographics
Base: All respondents

Demographics							
Person 1		Person 2		Person 3		Person 4	
Male	Female	Male	Female	Male	Female	Male	Female
2 respondents	13 respondents	10 respondents	4 respondents	3 respondents	4 respondents	1 respondent	3 respondents
Person 5		Person 6		Person 7		Person 8	
Male	Female	Male	Female	Male	Female	Male	Female
2 respondents	2 respondents	3 respondents	1 respondent	1 respondent	1 respondent	1 respondent	1 respondent

- 2.9 9 respondents said that there are no families or unmarried adults living on their pitch that are in need of a pitch of their own in the next 5 years, while 5 respondents said that there is one in need and 1 respondent said there are three families or unmarried adults in need.
- 2.10 All 10 respondents said that none of their children will need a home of their own in the next 5 years as a result of getting married or leaving home.
- 2.11 11 respondents said that no one living there is on the waiting list for a pitch in the area. 4 respondents said that someone living there is on the waiting list.
- 2.12 Of those who said that someone living on the pitch is on the waiting list, 3 respondents said that one person is on the waiting list and 1 respondent said that two people are on the waiting list. 1 of these respondents said that they had been on the waiting list for 0-3 months while 3 respondents said they had been on there for 2 or more years.
- 2.13 Of those who said that no one there is on the waiting list, 9 respondents said that one person living there would want to be on the waiting list, 1 respondent said that two people want to and 1 respondent said that three people want to be on the waiting list.
- 2.14 13 respondents do not plan to move from their site in the next 5 years. However 2 respondents do plan to move from their site in the next 4 years. Those who plan to move were asked where they would move to. 1 respondent said they would like to move into a site in another council area and 1 respondent would like to move into bricks and mortar in the area. Both respondents said that they would prefer to rent a public pitch or house. Both respondents also said that they cannot afford to buy a private pitch or site.
- 2.15 5 respondents/respondents' families have made no trips, living in a caravan or trailer away from their permanent base in the last 12 months. 2 respondents have made one trip away, 1 respondent has made two trips, 2 respondents have made 3 trips, 1 respondent has made 4 trips and 4 respondents have made five or more trips away from their permanent base in the last 12 months.
- 2.16 Of the respondents who have travelled in the last 12 months 8 respondents said that all the family travelled. 4 respondents travelled for holidays, 1 respondent each said that they travel for work, fairs and to visit family. 5 respondents said that they travel during the spring/summer and 5 respondents travel all year round. Respondents were asked how long they travel for. Answers ranged from between a week and a couple of months, several respondents also said that it depends on why they are travelling.
- 2.17 5 respondents said that when they or their family are travelling, they usually stay with other friends/family, 3 respondents stay on private transit sites, 2 respondents stay on the roadside and 1 respondent stays on local authority transit sites.
- 2.18 The 5 respondents who said they had not travelled in the last 12 months were asked if they or their family had ever travelled. All respondents said that they have travelled in the past. Respondents had stopped travelling for various amounts of time ranging between 2 and 34 years. Reasons given for no longer travelling included children in school, old age, ill health and because there is nowhere to stop.
- 2.19 12 of 15 respondents said that family members do plan to travel in the future. Respondents who do plan to travel in the future plan to travel for fairs, visiting family, for work and for holidays.

Appendix D – Technical Note on Household Formation



Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University



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Household Growth Rates

Abstract and conclusions

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

Introduction

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

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

The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count. [In footnote 6, page 25]
10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.
11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

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

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

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

Compound growth

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

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

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

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

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

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

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

Caravan counts

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

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

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

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

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

Modelling population growth

Introduction

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

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

Migration effects

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

Population profile

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

Table 4

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

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

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

Birth and fertility rates

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

Death rates

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

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

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

Modelling outputs

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

Household growth

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

Table 5

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

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

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

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

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

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

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

Household dissolution rates

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

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

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

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

Summary conclusions

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

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