

# Black Country Gypsy and Traveller Accommodation Assessment

Final Report  
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*RRR Consultancy Ltd*





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# Executive Summary

## Introduction

- S1. The four Black Country local authorities of Dudley MBC, Sandwell MBC, Walsall Council, and City of Wolverhampton Council commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) for the period 2021-2039. The results will be used as an evidence base for policy development in housing and planning.
- S2. The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers (DCLG, 2015). Throughout the report this policy will be referred to as PPTS 2015 or simply PPTS.
- S3. To achieve the study aims, the research drew on a number of data sources including:
- Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2021) Department of Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers<sup>1</sup>.
  - An online survey, and telephone interviews with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Travelling Showpeople.
  - Extensive face-to-face and telephone surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs.
- S4. The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs. The consultation was undertaken in a Covid-19 safe manner i.e. it followed government guidance and restrictions. However, this meant that consultation with households was delayed and some consultation was undertaken using remote methods e.g. over the telephone.

## Policy context

- S5. In August 2015, the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use

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<sup>1</sup> Please note that due to Covid-19 restrictions the Traveller Count did not take place in July 2020 or January 2021.

evidence to plan positively and manage development. Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.

- S6. Given differences in defining Gypsies and Travellers this GTAA provides three need figures: first, one based on the ethnic identity definition; second, based on the needs of families who have *not* permanently ceased to travel (i.e. based on the PPTS 2015 definition); and third, based on the 'travel for work' interpretation of PPTS 2015. The three accommodation needs definitions are discussed in more detail in Chapters 2 and 5.
- S7. In March 2016, the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that, when considering the need for caravans and houseboats, local authorities will need to include the needs of a variety of residents in differing circumstances including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- S8. According to NPPF, (2021) along with related planning guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs, and address the needs of groups with specific housing requirements. The NPPF (2021) refers to the need to both assess and then address the accommodation needs of those who are ethnically recognised Gypsies and Travellers (as in line with the Equalities Act 2010), both who are covered by the definition in Appendix 1 of the PPTS 2015 and those outside of the definition.
- S9. In relation to local planning policies policy HOU4 of the Draft Black Country Local Plan (2021) 'Accommodation for Gypsies and Travellers and Travelling Showpeople' outlines the criteria for new permanent and transit residential pitches and plots.

## Population Trends

- S10. In October 2021 there were a total of 154 pitches within the study area consisting of 97 pitches located on local authority owned sites, 35 on privately owned sites, 18 unauthorised pitches located on sites without planning permission, and 4 pitches with temporary planning permission. There were also 79 pitches on 3 transit sites in Dudley and Sandwell. There are 23 Travelling Showperson's yards containing 101 plots in the study area.
- S11. The 2011 Census only records data concerning Gypsies and Travellers. It recorded 351 Gypsies and Travellers residing in the study area representing around 0.09% of the usual resident population. This is slightly below the average for England & Wales of 0.10%. The proportion of Gypsies and Travellers recorded in the study area local authorities varied widely with 0.05% of Sandwell recorded as Gypsies or Travellers, 0.8% of Wolverhampton, 0.11% of Dudley, and 0.11% of Walsall.

- S12. The DLUCH July 2021 Count shows there were 219 Gypsy and Traveller caravans located in the study area. In relation to density and both Sandwell and Wolverhampton recorded 5 caravans per 100,000 population compared with Dudley (8), and Walsall (47). This compares to 85 caravans per 100,000 population in the West Midlands and 43 caravans per 100,000 population in England. The total number of caravans recorded on authorised pitches in the study area decreased over the 4.5-year period with 237 caravans located on authorised pitches in January 2016 compared to 161 caravans in July 2021.
- S13. DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. For example, it only records unauthorised encampments present on the day of the count. There were 97 caravans recorded on unauthorised sites in January 2016 compared to 9 in July 2021. In contrast, local authority data shows that during the period Q1 2017 to Q3 2021 there were 414 unauthorised encampments recorded equating to an average of 15 encampments per quarter. The number of unauthorised encampments has gradually declined over the 4.5-year period. On average, each unauthorised encampment consisted of 12 vehicles and lasted 6 days.
- S14. Transit provision already exists in Sandwell and Dudley, Wolverhampton has identified a potential transit site which has planning permission, and a transit site in Walsall is under construction. Given the new Police, Crime, Sentencing and Courts Bill (2021), it is recommended that Wolverhampton proceed with the development of a transit site. It is also recommended that all of the local authorities within the study area consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process.

### **Stakeholder Consultation**

- S15. Consultations with a range of stakeholders (service providers) were conducted to provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The aim of the consultation was to obtain both an overall perspective on issues facing the Gypsies, Travellers, and Showpeople, and an understanding of local issues that are specific to the study area. Due to Covid-19 restrictions the consultation took the form of an online survey and telephone consultation.
- S16. In recognition that Gypsies, Travellers, Travelling Showpeople and boat dweller issues transcend geographical boundaries and the duty to cooperate in addressing their accommodation needs, consultation was undertaken with officers from within the study area and from neighbouring authorities.

- S17. According to stakeholders the main drivers of accommodation need were determined as: a lack of permanent and transit provision; families passing through the study area or attending events such as weddings or funerals in local areas; and a reluctance from some Gypsy and Traveller families to pay for transit provision. Also, some accommodation need may derive from households residing on sites in South Staffordshire with historical links to the Black Country. The main barriers to new provision cited by stakeholders included a lack of suitable land and finance.
- S18. Stakeholders stated that it can be difficult to determine suitable locations for new sites although ideally there should be provision in every local authority area. It may be useful to consider developing brown field sites first, and then consider greenfield options. It was acknowledged that there can be public opposition to proposed new sites and that it may be necessary to develop new sites away from residential areas.
- S19. The main reasons stated by stakeholders for unauthorised encampments taking place included: a lack of available permanent pitches; travelling for work; households temporarily moving through the study area; and to attend fairs of social events. It was suggested that the travelling community tend to travel in large groups when attending events such as Appleby Fair.
- S20. They are more likely to travel during the summer months before returning to home bases during autumn and winter. The Impact of Covid-19 restrictions on reducing travelling and the number of unauthorised encampments was acknowledged. The main barriers to new transit provision are similar to those of permanent provision including lack of suitable sites; opposition from the settled community to new sites; and financial costs associated with maintaining and managing transit sites.

### **Accommodation need**

- S21. Accommodation need in the study area was assessed using analysis of primary and secondary data. The accommodation needs calculation steps were based on a model in accordance with both previous (2007) and current Practice Guidance (2015) issued by the Department of Communities and Local Government (DCLG). Although the 2007 guidance was withdrawn in 2016, it remains useful as a model to determine accommodation needs. It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data.
- S22. Table S1 summarises accommodation need over the period 2021-39. It is important to note that the figures shown in Table S1 includes all need as of October 2021, including any which may have been identified by previous GTAs but remained unfulfilled. It shows that a further 172 Gypsy and Traveller pitches (based on the ethnic identity definition), 125 pitches (based on PPTS 'travel for all' definition), or 81 pitches ('travel for work' definition) are needed over the period 2021-2039 in the study area.



## Gypsies and Travellers Accommodation Need

### Study Area

Table S.1: Summary of accommodation needs 2021-39 (pitches)			
Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	95	58	27
Total 2026-31	27	23	18
Total 2031-36	30	26	21
Total 2036-39	20	18	15
Total 2021-39	172	125	81

Source: GTAA 2022

### Dudley

Table S.2: Summary of accommodation needs 2021-39 (pitches)			
Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	22	13	6
Total 2026-31	7	6	5
Total 2031-36	8	7	6
Total 2036-39	5	5	4
Total 2021-39	42	31	21

Source: GTAA 2022

### Sandwell

Table S.3: Summary of accommodation needs 2021-39 (pitches)			
Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	9	5	2
Total 2026-31	3	3	2
Total 2031-36	3	3	2
Total 2036-39	2	2	2
Total 2021-39	17	13	8

Source: GTAA 2022

### Walsall

Table S.4: Summary of accommodation needs 2021-39 (pitches)			
Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	26	17	8
Total 2026-31	7	6	5
Total 2031-36	8	7	6
Total 2036-39	6	5	4
Total 2021-39	47	35	23

Source: GTAA 2022

**Wolverhampton**

Table S.5: Summary of accommodation needs 2021-39 (pitches)			
Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	38	23	11
Total 2026-31	10	8	6
Total 2031-36	11	9	7
Total 2036-39	7	6	5
Total 2021-39	66	46	29

Source: GTAA 2022

**Travelling Showpeople Accommodation Need****Study area**

Table S.6: Summary of accommodation needs 2021-39 (plots)	
Total 2021-26	40
Total 2026-31	15
Total 2031-36	16
Total 2036-39	10
Total 2021-39	81

Source: GTAA 2022

**Dudley**

Table S.7: Summary of accommodation needs 2021-39 (plots)	
Total 2021-26	15
Total 2026-31	3
Total 2031-36	3
Total 2036-39	2
Total 2021-39	23

Source: GTAA 2022

**Sandwell**

Table S.8: Summary of accommodation needs 2021-39 (plots)	
Total 2021-26	20
Total 2026-31	4
Total 2031-36	4
Total 2036-39	3
Total 2021-39	31

Source: GTAA 2022

**Walsall**

Table S.9: Summary of accommodation needs 2021-39 (plots)

Total 2021-26	4
Total 2026-31	7
Total 2031-36	8
Total 2036-39	5
Total 2021-39	24

Source: GTAA 2022

**Wolverhampton**

Table S.10: Summary of accommodation needs 2021-39 (plots)

Total 2021-26	1
Total 2026-31	1
Total 2031-36	1
Total 2036-39	0
Total 2021-39	3

Source: GTAA 2022

**Conclusions**

S23. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

- It is recommended that the councils consider how the land identified in the Local Authority Allocations Policy can best meet the identified accommodation needs, in relation to Gypsies, Travellers and Showpeople.
- In relation to Gypsies and Travellers it is also recommended that the councils work closely with the families to determine how their accommodation need can best be met.
- Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
- In order to meet the accommodation needs of Showpeople it is recommended that the local authorities work closely with the owners of existing yards to explore opportunities to create more plots on existing or purchased land.

S24. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

*Planning policy:*

- To consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process.

- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.
- To consider alternative options for developing new sites and yards such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

*Management:*

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller, Travelling Showpeople and Boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller, Travelling Showpeople and boat dweller communities.
- During the ongoing Covid-19 related restrictions placed on the communities, determine help and support the council and other services could provide to the households

# 1. Introduction

## Study context

- 1.1 The four Black County local authorities of Dudley MBC, Sandwell MBC, Walsall Council, and City of Wolverhampton Council commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) for the period 2021-2039. The results will be used as an evidence base for policy development in housing and planning.
- 1.2 The requirement to assess the accommodation needs of Gypsies and Travellers and Showpeople is established through national guidance contained in Planning Policy for Traveller Sites (DCLG, 2015).

## Methodological context

- 1.3 To achieve the study aims, the research drew on a number of data sources including:
  - Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2021) MHCLG<sup>2</sup> Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - An online survey and telephone interviews with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Travelling Showpeople.
  - Extensive face-to-face surveys of Gypsies, Travellers and Travelling Showpeople, covering a range of issues related to accommodation and service needs. This key element of the methodology provided an extensive range of data enabling future accommodation needs to be assessed.
- 1.4 The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs. The consultation was undertaken in a Covid-19 safe manner i.e. it followed government guidance and restrictions. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including site and yard owners and managers, neighbours, and relatives) was undertaken, some of which was undertaken over the telephone.

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<sup>2</sup> The MHCLG was renamed the 'Department of Levelling Up, Communities and Housing' in September 2021.

## GTAA study area

### *The Black Country*

- 1.5 The area covers 356 square kilometres and sits at the heart of England, forming the western part of the West Midlands Metropolitan Area, the largest conurbation outside London. The area lies at the heart of the West Midlands transport hub, with national rail and motorway links north, south, east and west, notably the West Coast Main Line and the M5 and M6 motorways<sup>3</sup>.
- 1.6 There are 25 towns and four major strategic centres in the Black Country (Brierley Hill, Walsall, West Bromwich, and Wolverhampton). The Black Country's four Strategic Centres provide the focus for shopping, particularly non-food, commercial, leisure and employment; complemented by its town centres (including Walsall's district centres) and network of local centres, serving the Black Country's communities. Changing shopping patterns are presenting many challenges, such as vacancy levels, which mean many centres are struggling.
- 1.7 Beyond its industrial heartland, the character of the Black Country is quite different and varied. The green borderland, which has been designated as Green Belt, is most prominent in parts of Dudley, Walsall and the Sandwell Valley, and is a largely open landscape made up of agricultural land, woodland, nature reserves, sports and recreational facilities and scattered communities, containing fragile remnants of the ancient past.
- 1.8 The Black Country is connected to the main line rail network at Wolverhampton and Sandwell and Dudley Stations. Improvements in the public transport network (especially the Wednesbury to Brierley Hill Midland Metro Extension) will better connect the Black Country into the national and local rail network and improve mobility across the Black Country.
- 1.9 The denseness of the urban area and the number of centres create particularly complex movement patterns and have led to a complicated transport network. Buses are the most important method of public transport travel in the Black Country, but they face challenges especially from declining speeds due to congestion.
- 1.10 A legacy of the decline in heavy industry, and the jobs associated with it, has been the difficult ground conditions left behind. Recently however, the economy has grown, and residents' wages have increased. At the same time the employment rate has grown at a faster pace than in England generally (3.5% growth compared to 0.9%) and Gross Value Added in the Black Country was £21.7bn in 2020, an eight-year high (Black Country Consortium, 2020). According to the Draft Black Country Local Plan (2021),

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<sup>3</sup>Black Country Core Strategy, Adopted February 2011.

the challenge is to keep that momentum, particularly in the light of the Covid-19 pandemic, ensuring growth is sustainable and that the Black Country Plan is part of that process through providing the right sites for economic growth<sup>4</sup>.

## Summary

- 1.11 Whilst the Housing and Planning Act 2016 removes the requirement for all local authorities to carry out a specific assessment, the accommodation needs of Gypsy and Traveller households are still required to be considered in housing needs assessments. Also, the August 2015 Planning Policy for Traveller Sites (PPTS) reiterates the need for local authorities to evidence the accommodation needs of Gypsies and Travellers and to determine the number, type and location of new provision.
- 1.12 The PPTS (2015) amended the definition of Gypsies and Travellers for planning purposes so that only the accommodation needs of households who have not permanently ceased to travel are assessed. It requires local planning authorities to set pitch targets for Gypsies and Travellers, and plot targets for Travelling Showpeople, as defined in Annex 1, to address the likely permanent and transit site accommodation needs of travellers in their area. The needs of Travellers will be informed by local housing need assessments.
- 1.13 The purpose of this assessment is to quantify the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the study area between 2021 and 2039. This is in terms of permanent pitches/plots, sites/yards, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. This report will form part of the evidence base for the Black Country Local Plan.
- 1.14 To achieve the study aims, the research drew on several data sources including: a review of secondary information; consultation with organisations involved with Gypsy and Traveller and Travelling Showpeople issues, and extensive surveys of Gypsies and Travellers. These provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

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<sup>4</sup> Draft Black Country Local Plan (2021) pp. 14-17

## 2. Policy context

### Introduction

- 2.1 To assess the current policy context, existing documents have been examined to determine what reference is made to Gypsy and Traveller and Travelling Showpeople issues.
- 2.2 The intention is to summarise key national and local policies and examine the findings of GTAAs recently undertaken by neighbouring authorities. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation need and housing related support need among Gypsies and Traveller and Travelling Showpeople.

### National Policies

#### *DCLG Planning Policy for Traveller Sites (PPTS) (August 2015)*

- 2.3 In August 2015 the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:
- effectively engage with traveller communities
  - co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas
  - and use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions
- 2.4 There are some key differences between the March 2012 and August 2015 versions of the PPTS. One important amendment relates to the change in the definitions of Gypsies, Travellers, and Travelling Showpeople. The August 2015 PPTS changed the definition to exclude households who have permanently ceased to travel – in effect, for planning purposes, PPTS 2015 regards such households as members of the settled community.



## Definition Context

- 2.5 In August 2015, the DCLG amended its definition of Gypsies and Travellers<sup>5</sup>, as set out below:

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but 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.*

- 2.6 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equalities Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>6</sup>.

- 2.7 According to DCLG (August 2015) guidance on planning policy for traveller sites, the definition of Travelling Showpeople is:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.<sup>7</sup>*

- 2.8 Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAA's), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It

<sup>5</sup> DCLG, Planning Policy for Traveller Sites, August 2015.

<sup>6</sup> DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

<sup>7</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015.

recommends that Travelling Showpeople's own accommodation needs and requirements should be separately identified in the GTAA<sup>8</sup>. To ensure it is following DCLG guidance, this GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG 'Planning Policy for Traveller Sites' (August 2015) (see above).

- 2.9 It is important to note that Gypsies and Travellers and Travelling Showpeople have separate accommodation need requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. As well as space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.
- 2.10 Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.11 One interpretation is that 'a nomadic habit of life' means travelling for an economic purpose. Previous case law e.g. *R v Shropshire CC ex p Bungay* (1990) and *Hearne v National Assembly for Wales* (1999) has been used to support this point. There is nothing within PPTS 2015 which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling. Also, such case law precedes the August 2015 definition change and it is believed that there has not yet been any case law in relation to the updated definition. However, a report published by the Equalities and Human Rights Commission (EHRC) (September 2019) has critiqued reliance on the 'work interpretation' method<sup>9</sup>.
- 2.12 Given the above, our approach is to undertake a methodology which provides first, an accommodation need figure based on ethnic identity; and second, a figure based on the PPTS (August 2015). Different GTAA's reach differing conclusions on which approach / definition to adopt and it is for local authorities to decide individually which approach to take for planning purposes. It is recommended that this be kept under review in the light of evolving appeal decisions and case law.

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<sup>8</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.

<sup>9</sup> See: <https://www.equalityhumanrights.com/en/publication-download/gypsy-and-traveller-sites-revised-planning-definition%E2%80%99s-impact-assessing>

*DCLG Review of housing needs for caravans and houseboats: draft guidance (March 2016)*<sup>10</sup>

2.13 In March 2016 DCLG published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances, for example:

- Caravan and houseboat dwelling households:
  - who have no authorised site anywhere on which to reside
  - whose existing site accommodation is overcrowded<sup>11</sup> or unsuitable, but who are unable to obtain larger or more suitable accommodation
  - who contain suppressed households who are unable to set up separate family units and
  - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
  
- Bricks and mortar dwelling households:
  - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

2.14 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Travellers, and Travelling Showpeople.

2.15 The DCLG draft guidance (2016) recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:

- their nomadic or semi-nomadic pattern of life
- their preference for caravan and houseboat-dwelling
- movement between bricks-and-mortar housing and caravans or houseboats
- their presence on unauthorised encampments or developments.

2.16 Also, it suggests that as mobility between areas may have implications for carrying out an assessment local authorities will need to consider:

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

<sup>11</sup> Overcrowding e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its caravan accommodation and insufficient space on the pitch or site for a further caravan (DCLG 2007 p.25)

- co-operating across boundaries both in carrying out assessments and delivering solutions
- the timing of the accommodation needs assessment
- different data sources.

2.17 Finally, the DCLG draft guidance (2016) states that in relation to Travelling Showpeople account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.

### *Housing and Planning Act 2016*

2.18 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.

### **Local Planning Policies**

2.19 The four Black Country local authorities are currently working on preparing the Black Country Plan. The local authorities held a formal 8-week public consultation on the Draft Plan in summer 2021 where they asked members of the public and other stakeholders to comment on the Draft Plan policies and proposed land allocations. The Draft Plan includes a policy and interim pitch and plot targets, in anticipation of this GTAA being completed to inform the Publication Plan (due to be approved for consultation in summer 2022).

2.20 Section 4 of Policy HOU4 'Accommodation for Gypsies and Travellers and Travelling Showpeople' of the draft Local Plan (August 2021) outlines the criteria for new permanent residential pitches and plots:

- a. The site should be suitable as a place to live, particularly with regard to health and safety, and the development should be designed to provide adequate levels of privacy and amenity for both occupants and neighbouring uses
- b. The site should meet moderate standards of access to residential services set out in Policy HOU2

- c. The site should be located and designed to facilitate integration with neighbouring communities
- d. The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate, including in the case of Travelling Showpeople sufficient level space for outdoor storage and maintenance of equipment
- e. The site is served or capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection).

2.21 Policy HOU4 states that the location, design and facilities provided on new sites will be determined in consultation with local Gypsies, Travellers, and Travelling Showpeople and will also consider or reflect any available national guidance. Also, existing traveller sites will be safeguarded and their redevelopment or use for other purposes will be opposed, unless there is evidence either that a suitable replacement with equivalent capacity has been provided elsewhere or that the existing site is no longer required to meet identified need.

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

2.22 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Also, the need for councils to cooperate reflects the characteristic that Gypsy and Traveller travelling patterns transcend local authority borders.

2.23 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.

2.24 As part of this assessment consultation in relation to Gypsies, Travellers and Travelling Showpeople was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in detail in Chapter 4.

2.25 Given the transient nature of Gypsies and Travellers it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section discusses the results of GTAA's recently undertaken by both the Black Country Authorities (which have commissioned this assessment) and neighbouring or nearby local authorities specifically in relation to accommodation need and travelling patterns.

### *Black Country and South Staffordshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2016*

2.26 The 2016 GTAA was undertaken on behalf of the Black Country local authorities of Dudley MBC, Sandwell Council, Walsall Council and Wolverhampton City Council, and South Staffordshire Council. It was undertaken using analysis of secondary data provided by the District local authorities rather than primary surveys. The GTTSAA identified a need for 156 Gypsy and Traveller pitches and 63 Travelling Showpeople plots over the 20-year period 2016-2036. Stakeholders identified main travelling routes within the District as the A41, M54/A5, and A454. The A41/A49 is particularly used by Gypsies and Travellers in Shropshire. The number of unauthorised caravans throughout the District recorded by the DCLG Traveller Caravan Count had increased steadily throughout the previous 2 years from a total of 23 in January 2014 to 69 in January 2016. In particular, the number of caravans recorded in Sandwell increased from 9 in July 2015 to 35 in January 2016. This 2021 GTAA supersedes the 2016 GTAA for the Black Country authorities. A separate GTAA is currently being prepared for South Staffordshire to inform the emerging South Staffordshire Local Plan up to 2038.

### *Birmingham Gypsy and Traveller Accommodation Assessment (GTAA) 2019*

2.27 According to the GTAA, for those households that meet the PPTS 2015 planning definition there is a need for 19 additional pitches over the GTAA period to 2033. This is made up of 3 households on unauthorised pitches at Tameside Drive; 9 households who have been living on unauthorised encampments in Birmingham for many years and need a permanent pitch; 3 teenagers living on one of the encampments who will need a pitch of their own in the next 5 years; and new household formation of 4 pitches based on the demographics of the households on the encampments. There is also a need for 1 additional pitch for households that do not meet the planning definition. This is made up of 1 teenager living on the private site who will be in need of a pitch of their own in the next 5 years. In relation to transit provision, the GTAA notes that the Council are looking at options to bring back into operational use between 15-18 public transit pitches on the former transit site at Tameside Drive. This would lead to a total of up to 37 transit pitches which would exceed the recommendations made by the previous GTAA for between 10-15 transit pitches. It also recommends that the local authority consider the use of High Court injunctions to prevent groups of Travellers from moving onto specific areas of public land known to be popular for encampments in Birmingham, and other management-based approaches such as short-term toleration or Negotiated Stopping Agreements.

### *Coventry Gypsy and Traveller Accommodation Assessment (GTAA) 2015*

2.28 The GTAA identified a need for 4 Gypsy and Traveller pitches over the 5-year period 2014/15 to 2018/19. However, it states that if assumptions regarding households in bricks and mortar accommodation are excluded from analysis then the authorised pitch shortfall is -1 i.e. there was sufficient capacity at the present time. The GTAA identified a need for an additional 6 pitches for the 13-year period 2019/20 to 2031/32. The GTAA noted that Gypsy and Traveller households tend to move between Warwickshire and Coventry. In relation to transit provision, the GTAA recommended that the City Council identify temporary stopping or transit places for 6 pitches of sufficient size.

### *Rugby Borough Council Gypsy and Traveller Accommodation Assessment Study (GTAAS) 2017*

2.29 The GTAAS was undertaken using survey interviews with Gypsy and Traveller households residing in the District. Between May 2017 and July 2017, a total of 81 surveys were undertaken by RRR Consultancy with Gypsy and Traveller families residing on authorised permanent and transit sites and families residing on sites with temporary planning permission. The GTAAS identified a need for 76 additional pitches for the period 2017-2037 (including households who do not travel for work) or 52 additional pitches (excluding households who do not travel for work). There was a total of 96 unauthorised encampments over the period January 2015 to April 2017 equating to an average of 10 per quarter. Excluding 'outliers' i.e. unauthorised encampments of unusual length, the average length of encampments was 5 days. Over nine tenths of all unauthorised encampments in the previous 3 years occurred in Rugby town. On average, the number of unauthorised encampments within the borough had been steadily decreasing.

### *South Worcestershire GTAA 2019*

2.30 The GTAA was completed on behalf of Malvern Hills District Council, Worcester City Council, and Wychavon District Council for the period 2019-2041. It found a need for a further 167 Gypsy and Traveller pitches (based on the ethnic identify definition), 104 pitches (based on PPTS 2015), or 71 pitches ('work' definition) are needed over the period 2019-2041 in South Worcestershire. There is also a need for 10 additional Travelling Showpeople plots over the same period. The main drivers of need within the first 5-year period are from overcrowding and new family formation. The GTAA suggests that accommodation need can be addressed by expanding the number of pitches permitted on existing private sites and/or providing new sites. In relation to transit provision, GTAA recommends that the local authorities continue with the Worcestershire negotiated stopping policy which involves caravans being sited on suitable land for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets.

### *Stratford on Avon GTAA 2019*

- 2.31 The GTAA assesses accommodation need over the period 2019-35. The GTAA found that a further 70 Gypsy and Traveller pitches (based on the ethnic identify definition), and 59 pitches (based on PPTS 2015) are needed over the period 2019-2035 in Stratford-on-Avon. There is also a need for 6 additional Travelling Showpeople plots over the same period. The main drivers of need are from 'hidden' households and new family formation. The GTAA recommended that the council could work with the PPTS 2015 definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the council would firstly meet the need of 59 (28 within the first five years) as its obligation, but accept the need of a further 11 (8 within the first five years) as potential need in the area, if further applications are brought forward through windfall. In relation to transit provision, the GTAA recommends the adoption of a negotiated stopping policy which involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets.

### *Warwick District Council Gypsy and Traveller Accommodation Assessment (GTAA) 2012*

- 2.32 The GTAA was based in a sample of 43 Gypsy and Traveller households residing on sites and in bricks and mortar accommodation. The GTAA identified a need for an additional 31 Gypsy and Traveller pitches for the period 2012-2026. It also suggested the need for 12 transit pitches. The GTAA noted that there were 72 separate unauthorised encampments during 2009-2012, although some unauthorised encampments consisted of the same households travelling around the District. Most unauthorised encampments were transiting through the District. The GTAA supported the approach of creating a network of transit facilities across the wider region to accommodate short-term accommodation requirements.

## **Summary**

- 2.33 DCLG Planning Policy for Traveller Sites (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS. In relation to local planning policies policy HOU4 of the Draft Black Country Plan (2021) 'Accommodation



for Gypsies and Travellers and Travelling Showpeople' outlines the criteria for new permanent and transit residential pitches and plots.

- 2.34 Given the cross-boundary characteristic of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAAs produced by neighbouring local authorities. GTAAs recently undertaken by neighbouring local authorities indicate that there remains some Gypsy and Traveller accommodation need throughout the region. However, only South Staffordshire Council and Lichfield District Council have asked neighbouring authorities, including the Black Country Authorities (BCA), to consider accommodating unmet need arising in their area.

## 3. Trends in the population levels

### Introduction

- 3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the MHCLG Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the MHCLG on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation need.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of caravans (tourer and static caravans) and so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches / households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The MHCLG Count includes data concerning Gypsies and Travellers sites<sup>12</sup>. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from January 2016 to July 2021.

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<sup>12</sup> Data regarding Travelling Showpeople is published separately by the MHCLG as 'experimental statistics'.

## Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people<sup>13</sup>. There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks and mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DLUHC. Due to Covid-19 restrictions the Count did not take place in July 2020 or January 2021. The July 2021 Count (the most recent figures available) indicate a total of 24,203 caravans. Applying an assumed three person per caravan<sup>14</sup> multiplier would give a population of 72,609 persons.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing,<sup>15</sup> gives a total population of 145,218 persons for England. However, given the limitations of the data this figure can only be very approximate, and may be a significant underestimate.
- 3.9 For the first time, the national census undertaken in 2011 included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. Table 3.1 below shows the total population and Gypsy and Traveller population in the Black Country as derived from the 2011 Census. It shows that in 2011 there were 989 Gypsies and Travellers residing in the study area representing around 0.09% of the usual resident population.<sup>16</sup> This is the same as the West Midlands average of 0.09% and slightly below the average for England & Wales of 0.10%. The proportion of Gypsies and Travellers recorded in the study area local authorities varied widely with 0.05% of Sandwell recorded as Gypsies or Travellers, 0.08% of Wolverhampton, 0.11% of Dudley, and 0.11% of Walsall.

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<sup>13</sup> House of Commons 'Tackling inequalities faced by Gypsy, Roma and Traveller communities' April 2019 located at: [www.parliament.uk](http://www.parliament.uk)

<sup>14</sup> Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

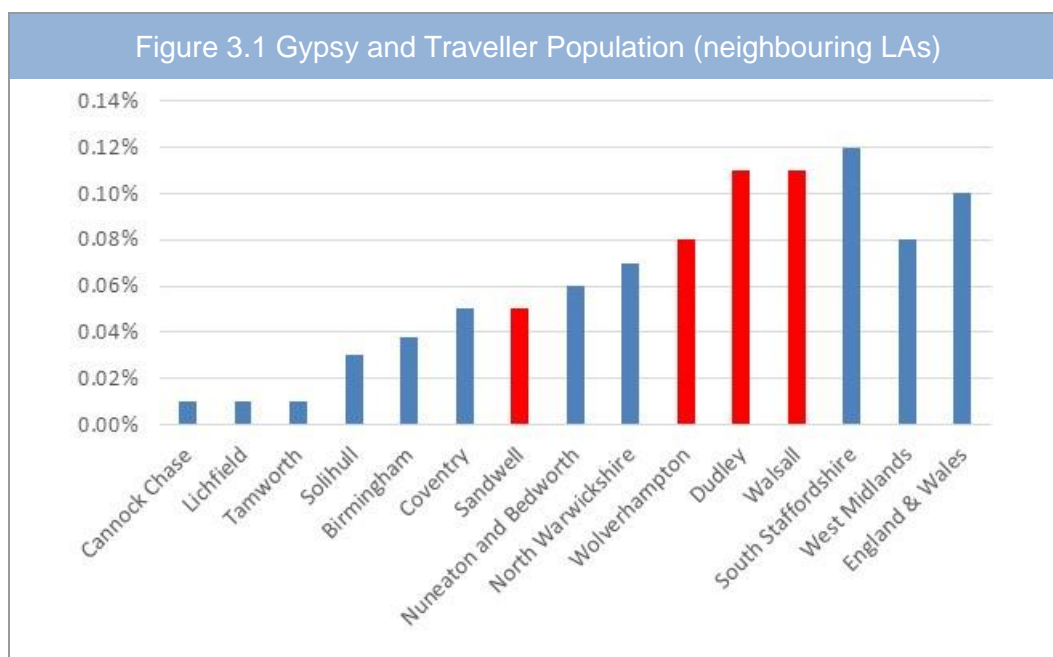
<sup>15</sup> Ibid.

<sup>16</sup> See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Dudley	312,925	352	0.11%
Sandwell	308,063	141	0.05%
Walsall	269,323	287	0.11%
Wolverhampton	249,470	209	0.08%
Black Country	1,139,781	989	0.09%
West Midlands	5,601,847	4,734	0.08%
England and Wales	56,075,912	57,680	0.10%

Source: Census 2011 cited by NOMIS 2020

- 3.10 Figure 3.1 shows the Gypsy and Traveller population as a proportion of the total population for the Black Country local authorities in the context of neighbouring local authorities in the West Midlands. It shows that Dudley and Walsall have a relatively high proportion of Gypsies and Travellers compared to neighbouring local authorities.



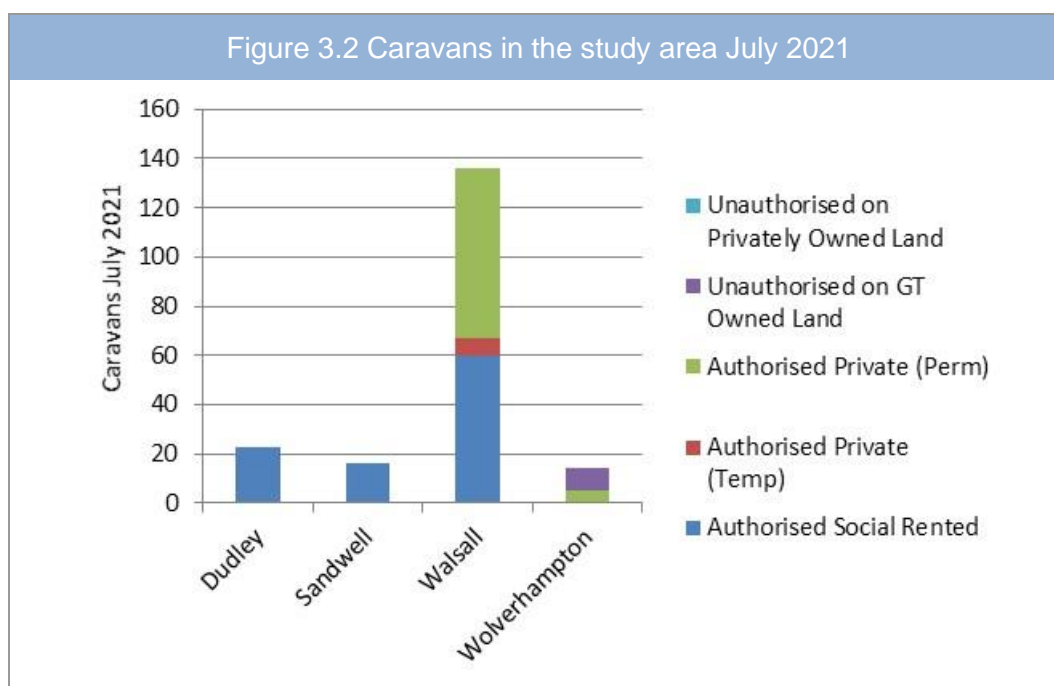
Source: Census 2011 cited by NOMIS 2020

- 3.11 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2011 Census data, Table 3.2 shows the tenure of 351 Gypsy and Traveller households. Over two fifths (46%) of households reside in social rented accommodation (compared with 47% in the West Midlands and 42% in England & Wales). Just under a third (30%) of households own the accommodation they occupy (compared with 31% in the West Midlands and 34% in England & Wales). A quarter (25%) of households reside in private rented housing (compared with 23% in the East Midlands and 24% in England & Wales). This includes households residing both on sites and in bricks and mortar accommodation.

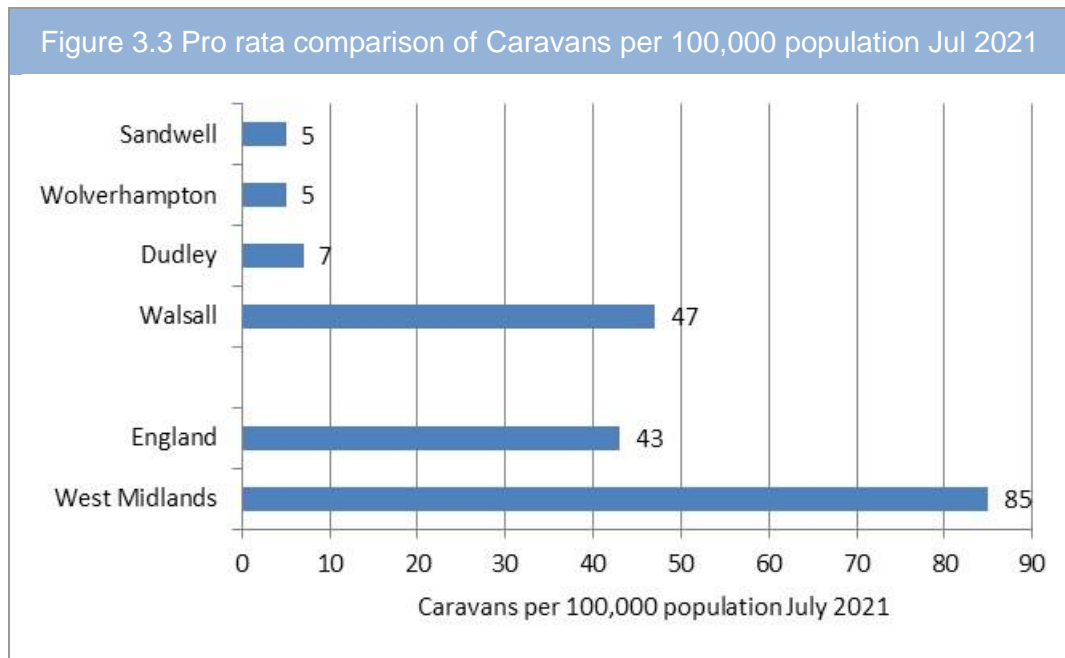
	Owned		Social rented		Private rented		Total	
Dudley	47	36%	58	45%	25	19%	130	100%
Sandwell	13	27%	14	29%	22	45%	49	100%
Walsall	16	18%	52	58%	22	24%	90	100%
Wolverhampton	28	34%	36	44%	18	22%	82	100%
Black Country	104	30%	160	46%	87	25%	351	100%
West Midlands	526	31%	805	47%	390	23%	1,721	100%
England and Wales	6,912	34%	8,567	42%	4,983	24%	20,462	100%

Source: Census 2011 cited by NOMIS 2020

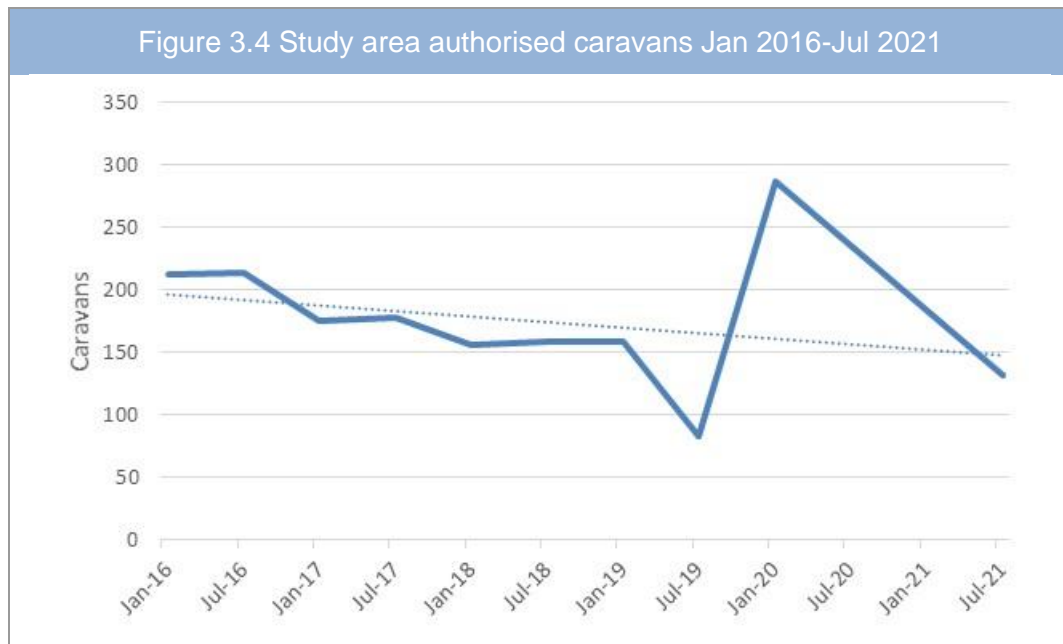
3.12 Figure 3.2 below shows the study area councils' July 2021 Caravan Count. There is some variation in the number of caravans in each local authority with 14 caravans recorded in Wolverhampton, 16 in Sandwell, and 23 in Dudley. In contrast, 136 caravans were recorded in Walsall. Over half (52%) of caravans were recorded on social rented sites, and over two fifths (43%) on privately owned sites with permanent or temporary planning permission. A small proportion (4% or 9 caravans) were located on unauthorised sites in Wolverhampton on land owned by Gypsies and Travellers.



Source: July 2021 DLUHC Traveller Caravan Count



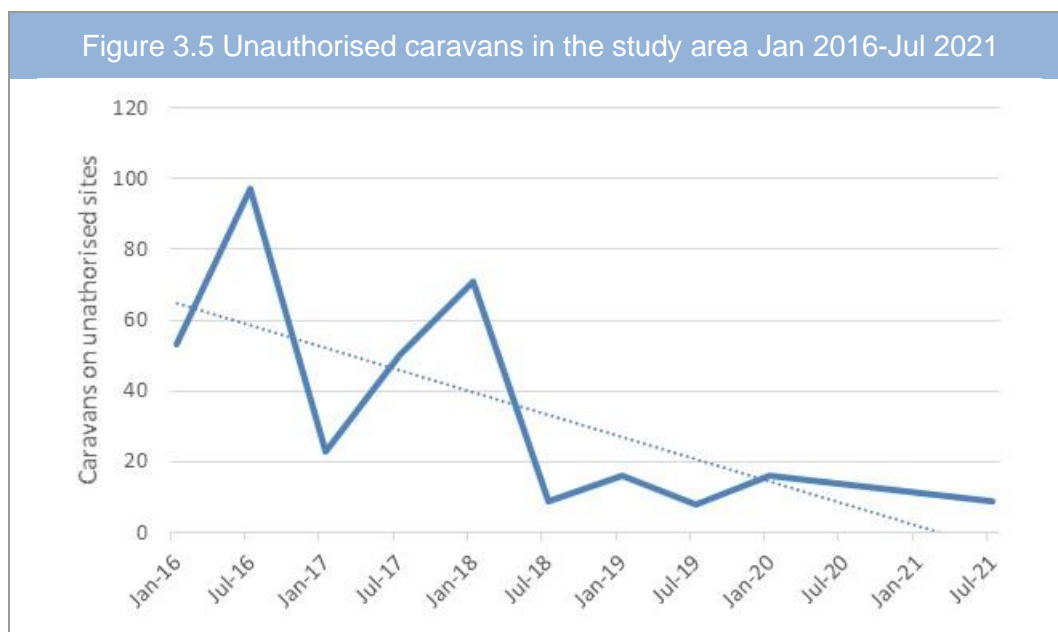
- 3.13 Figure 3.3 above shows that when the population is taken into account the density of caravans varies. Compared to the West Midlands average of 85 caravans per 100,000 population and England (43), the density of caravans in the Black Country is relatively low in Sandwell (5), Wolverhampton (5), and Dudley (8). Walsall is above the regional average at 47 caravans per 100,000 population.
- 3.14 Figure 3.4 shows the total number of caravans in the study area over the period January 2016 to July 2021. The Traveller Caravan Count recorded a total of 213 caravans located on authorised pitches in January 2016 compared to 131 caravans in July 2021. The dotted trend line shows that over the last 5.5 years there has been a decrease in the recorded number of authorised caravans. On average, over two fifths (43%) of caravans recorded on authorised sites occurred in Walsall compared with a quarter (25%) in Dudley, just under a fifth (19%) in Sandwell, and a tenth (10%) in Wolverhampton.



Source: July 2021 DLUHC Traveller Caravan Count

### Data on unauthorised encampments

3.15 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. For example, it only records unauthorised encampments present on the day of the count. Figure 3.5 shows there were 97 caravans recorded on unauthorised sites in January 2016 compared to 9 in July 2021. The dotted trend line shows that, on average, the number of caravans on unauthorised pitches has decreased over the period January 2016 to July 2021. On average, around two fifths of caravans recorded on unauthorised pitches were recorded in Wolverhampton (41%) and Sandwell (39%), whilst smaller proportions were recorded in Walsall (13%) and Dudley (7%).



Source: July 2021 DLUHC Traveller Caravan Count

### Local authority data on unauthorised encampments

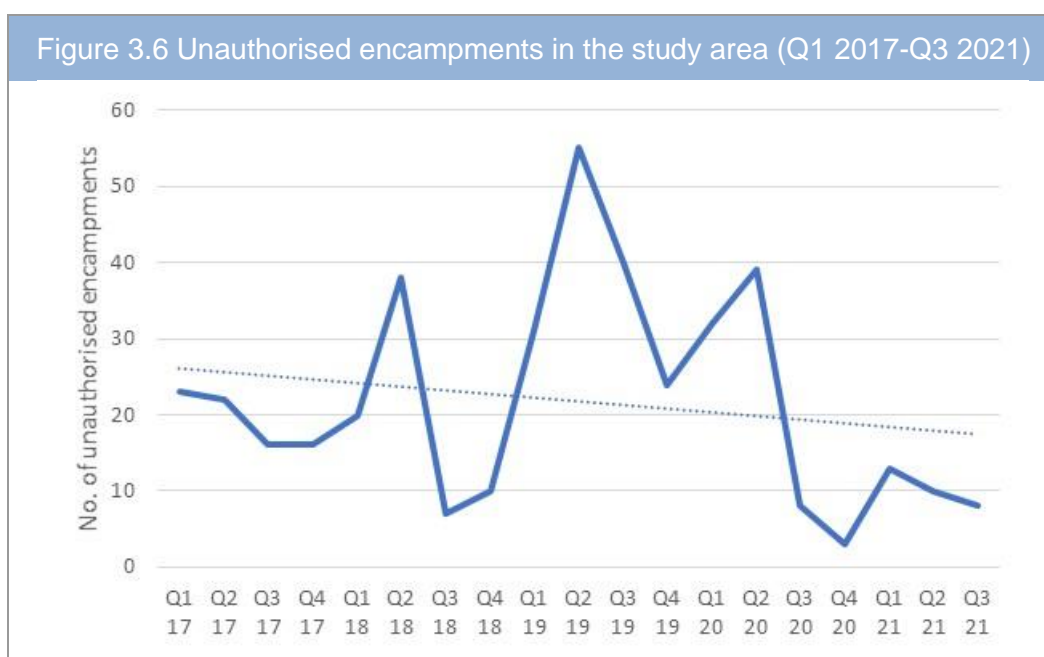
- 3.16 As previously noted, the DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'sites' without planning permission) is of limited accuracy, although it may indicate general trends. The study area local authorities keep more detailed records of unauthorised encampments. The records are inconsistent regarding the amount of detail they record (Sandwell keep the most detailed records), and they are recorded over different periods. Nonetheless, they are useful in determining key factors regarding unauthorised encampments in the study area.
- 3.17 Table 3.3 shows the number of unauthorised encampments in the study area for the 4.5-year period Q1 2017 to Q3 2021. During the period there were 414 unauthorised encampments recorded equating to an average of 22 encampments per quarter. However, the number of unauthorised encampments per quarter varied widely ranging from only 3 in Q4 2020, to 55 in Q2 2019. Walsall registered the most unauthorised encampments (50%), followed by Dudley (21%), Wolverhampton (17%), and Sandwell (12%). On average, each unauthorised encampment consisted of 11 vehicles and lasted 6 days. Figure 3.6 shows the number of unauthorised encampments for the period Q1 2017 to Q3 2021. The dotted trend line shows that the number of unauthorised encampments recorded has gradually declined over the 4.5-year period.
- 3.18 It should be noted that transit provision already exists in Sandwell and Dudley, Wolverhampton has identified a potential transit site which has planning permission, and a transit site in Walsall is under construction. Given that the new Police, Crime, Sentencing and Courts Bill (2021) will create a new offence of "residing on land without consent in or with a vehicle" and amend the existing police powers associated with unauthorised encampments to a lower the threshold at which they can be used, it is



important that transit provision is available in each study area local authority. As such, it is recommended that Wolverhampton proceed with the development of a transit site. It is also recommended that all of the local authorities within the study area consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets.

	From	To	No.
Dudley	Q1 2017	Q2 2020	88
Sandwell	Q1 2017	Q3 2020	50
Walsall	Q1 2017	Q3 2021	207
Wolverhampton	Q1 2017	Q3 2020	69
Total			414

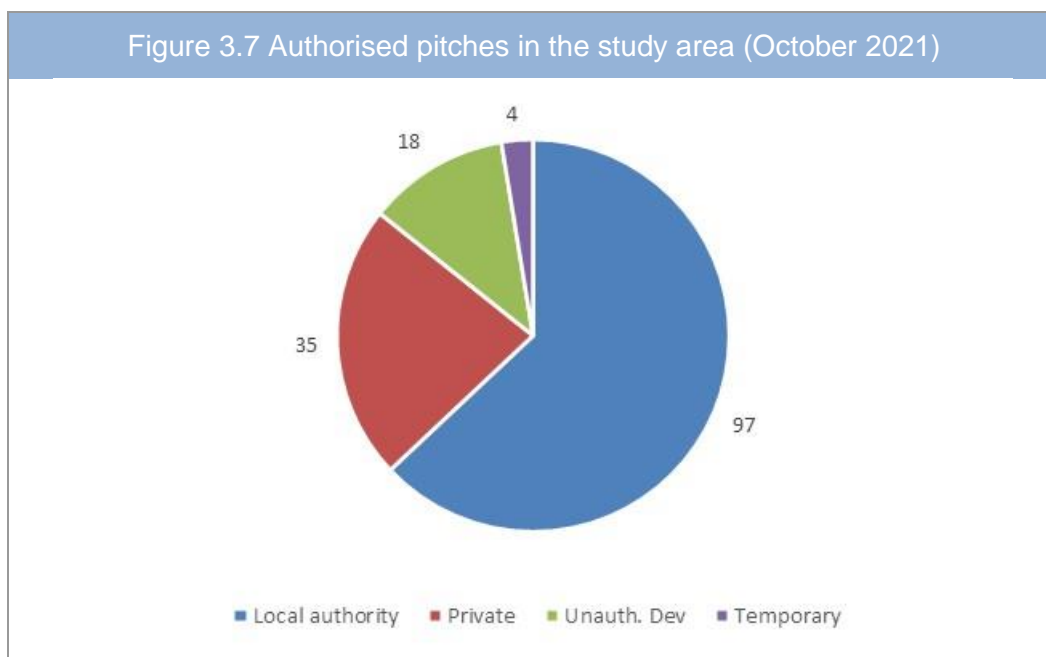
Source: Study area local authorities 2021



Source: Study area local authorities 2021

### Gypsy and Traveller residential pitches within the study area

3.19 Figure 3.7 shows that in October 2021 there were a total of 154 pitches within the study area consisting of 97 pitches located on local authority owned sites, 35 on privately owned sites, 18 unauthorised pitches located on sites without planning permission, and 4 pitches with temporary planning permission. There were also 79 pitches on three transit sites in Dudley and Sandwell.



Source: Study area local authorities 2021

3.20 Table 3.4 shows the distribution of pitches amongst the study area local authorities. Just under a third (31%) of provision is located in Wolverhampton consisting of 40 pitches located on local authority owned sites, and 2 private pitches. Similar proportions are located in Walsall (29%) consisting of 16 on local authority owned sites, 20 on private pitches, and 4 with temporary planning permission; and Dudley (28%) consisting of 22 pitches located on local authority owned sites and 16 private pitches. Finally, just over a tenth (12%) of Gypsy and Traveller pitch provision is located in Sandwell consisting wholly of 16 pitches located on a local authority site.

	Local authority (no.)	Private (no.)	Temporary (no.)	Total (no.)	Total (%)
Dudley	22	16	0	38	28%
Sandwell	16	0	0	16	12%
Walsall	16	20	4	40	29%
Wolverhampton	40	2	0	42	31%
Total	94	38	4	136	100%

Source: Study area local authorities 2021

### Travelling Showpeople residential plots within the study area

3.21 Data from planning permissions is also available in the study area showing provision for Travelling Showpeople. The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot.

3.22 There are 15 Travelling Showperson's yards containing 101 plots in the study area.

	Yards	Plots	UD yards	UD plots	Temp yards	Temp plots
Dudley	1	11	0	0	0	0
Sandwell	5	18	0	0	0	0
Walsall	8	68	0	0	0	0
Wolverhampton	1	4	0	0	0	0
Total	15	101	0	0	0	0

Source: Study area local authorities

3.23 It should be borne in mind that the amount of land needed for a Travelling Showpeople plot is greater than that for Gypsy and Traveller pitches because of the mixed use of the plots. For clarity, we refer to Travelling Showpeople 'plots' rather than 'pitches', and 'yards' rather than 'sites' to recognise the differences in design.

## Summary

3.24 The 2011 Census suggests there were 989 Gypsies and Travellers residing in the study area representing about 0.09% of the total population compared to 0.08% in the West Midlands and 0.10% in England & Wales. The 2011 Census records a total of 351 Gypsy and Traveller households residing within the study area of which over two fifths (46%) were residing in social rented accommodation, just under a third (30) in accommodation owned by the occupier, and a quarter (25%) in private rented accommodation.

3.25 The DLUHC July 2021 Count shows there were 219 Gypsy and Traveller caravans located in the study area. In relation to density both Sandwell and Wolverhampton recorded 5 caravans per 100,000 population compared with Dudley (7), and Walsall (58). This compares to 85 caravans per 100,000 population in the West Midlands and 43 caravans per 100,000 population in England. The total number of caravans recorded on authorised pitches in the study area decreased over the 5.5-year period with 237 caravans located on authorised pitches in January 2016 compared to 161 caravans in July 2021.

3.26 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. For example, it only records unauthorised encampments present on the day of the count. There were 97 caravans recorded on unauthorised sites in January 2016 compared to 9 in July 2021.

3.27 In contrast, local authority data shows that during the period Q1 2017 to Q3 2021 there were 414 unauthorised encampments recorded equating to an average of 15 encampments per quarter. The number of unauthorised encampments has gradually

declined over the 3-year period. On average, each unauthorised encampment consisted of 12 vehicles and lasted 6 days.

- 3.28 It should be noted that transit provision already exists in Sandwell and Dudley, Wolverhampton has identified a potential transit site which has planning permission, and a transit site in Walsall is under construction. Given the new Police, Crime, Sentencing and Courts Bill (2021), it is recommended that Wolverhampton proceed with the development of a transit site. It is also recommended that all of the local authorities within the study area consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process.
- 3.29 In October 2021 there were a total of 154 pitches within the study area consisting of 97 pitches located on local authority owned sites, 35 on privately owned sites, 18 unauthorised pitches located on sites without planning permission, and 4 pitches with temporary planning permission. There were also 79 pitches on three transit sites in Dudley and Sandwell.

## 4. Stakeholder consultation

### Introduction

- 4.1 Consultations with a range of stakeholders (service providers) were conducted to provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The aim of this section of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the study area. The consultation took the form of an online survey and email and telephone consultation.
- 4.2 In recognition that Gypsy and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers from neighbouring authorities. Key stakeholders involved in the consultation included stakeholders from the local authorities and neighbouring authorities including:
- Bromsgrove District Council
  - City of Wolverhampton Council
  - Derbyshire Gypsy Liaison Group
  - Dudley MBC
  - National Federation of Gypsy Liaison Groups
  - Sandwell MBC
  - Showmen's Guild
  - South Staffordshire Council
  - Staffordshire Police
  - Walsall
  - Wyre Forest District Council
- 4.3 Themes discussed through the consultation included: the need for additional accommodation and facilities; travelling patterns; the availability of land; accessing services; and work taking place to meet the needs of Gypsies and Travellers. Stakeholders represented the following organisations:

### Accommodation

- 4.4 Stakeholders recognised that there is a long history of Gypsies and Travellers residing in the Black Country. Stakeholders were asked about the main issues facing Gypsies and Travellers and Travelling Showpeople in the local area. It was agreed by the majority of stakeholders that there is a need for more permanent sites and yards and for transit provision. In particular, there is a need for more small, family sites for Gypsy

and Traveller households. There are currently some small, family-sized sites within the study area although some are unauthorised and do not provide stable accommodation. In relation to Travelling Showpeople, there is a need for yards with more space, especially in Dudley and Sandwell. It was suggested that there may be households who currently reside in bricks and mortar accommodation who would prefer to reside on sites.

- 4.5 According to stakeholders, the main drivers of accommodation need in relation to the Gypsies, Traveller and Travelling Showpeople communities was determined as new family formation; in-migration into the study area; and the need for accommodation from households who have permanently ceased to travel. Some accommodation need may derive from households previously residing on sites in South Staffordshire.
- 4.6 The main barriers to new provision cited by stakeholders included a lack of suitable land and finance. It was suggested that there needs to be both political support and ring-fenced funding for new provision. Also, stakeholders stated that identifying new sites for Gypsies and Travellers can be challenging. This is usually undertaken through 'call to sites' exercises although a more targeted approach such as determining whether existing private sites can be expanded was mentioned. Due to financial constraints, much local authority owned land has been sold leaving only private land for development.
- 4.7 However, it was acknowledged that the planning system can be difficult for Gypsy and Traveller families to navigate. It was also suggested that local authorities should determine whether land they own (especially brown-field sites) may be suitable for development as new sites. Also, there can be resistance from local communities who may pressure elected members to prevent further expansion of accommodation. The higher demand for suitable land to accommodate new housing for the settled community can mean that finding land for new Gypsy and Traveller sites is given a lower priority.
- 4.8 Stakeholders stated that it can be difficult to determine suitable locations for new sites although ideally there should be provision in every local authority area. It may be useful to consider developing brown field sites first, and then consider greenfield options. Windfall sites may also provide alternative options whilst planning applications could be incorporated into Local Plans. It was acknowledged that there can be public opposition to proposed new sites and that it may be necessary to develop new sites away from residential areas. Alternatively, it was suggested that new sites should be connected to local communities.

#### **Transit provision and travelling patterns**

- 4.9 The main reasons stated by stakeholders for unauthorised encampments taking place in the area included: a lack of permanent and transit provision; families passing through

the study area or attending events such as weddings or funerals in local areas; and a reluctance from some Gypsy and Traveller families to pay for transit provision. However, it was suggested that some Gypsy and Traveller families may be looking for permanent accommodation within local areas.

- 4.10 The travelling community tend to travel in large groups when attending events such as Appleby Fair. They are more likely to travel during the summer months before returning to home bases during autumn and winter. A stakeholder from a neighbouring authority stated that in recent years they have experienced an increased number of transiting Irish Travellers.
- 4.11 Stakeholders differed in terms of whether the number of unauthorised encampments has increased or decreased in recent years with some experiencing an increase, some a decrease, and some stating no change. The Impact of Covid-19 restrictions on reducing travelling and the number of unauthorised encampments was acknowledged.
- 4.12 There was a mixed response as to the level of impact that the PPTS August 2015 definition has had on the travelling patterns of Gypsies and Travellers. This varied from no change to a significant increase. It was suggested that PPTS 2015 had led to more households on unauthorised encampments wanting to become visible in order to prove they are travelling. It adversely impacts on households who have permanently ceased to travel due to old age, disability or illness or caring for family members. It was noted that the PPTS 2015 is currently being legally challenged by the Community Law Partnership (CLP) as discriminatory, prejudicial, unreasonable and disproportionate. Also, it was noted that the consultation undertaken by DCLG prior to PPTS 2015 being implemented indicated that few respondents believed it would promote fairness in the planning system.
- 4.13 Stakeholders stated that the main barriers to new transit provision are similar to those of permanent provision including lack of suitable sites; opposition from the settled community to new sites; and financial costs associated with maintaining and managing transit sites. It was suggested that there is often a reluctance for local authorities to manage transit sites and they are often occupied longer-term by members of the same family. Opposition to transit sites from members of the settled community can mean that there is less political will to provide them. Also, there is the perception amongst the settled community that transit sites can lead to increased crime in local areas and/or lead to increased rubbish. Larger transit sites can be difficult to manage and may not accommodate households from different ethnic groups. It may be better to provide a larger number of smaller transit sites. Importantly, it was noted that a new temporary transit site of 45 pitches was opened in August 2020 in Dudley.

### **Relationship between Travellers communities and the settled community**

- 4.14 According to stakeholders, there can be tensions between the different traveller groups and the settled community. Planning applications for new sites and yards tend to attract opposition from the settled community. According to a stakeholder from a neighbouring local authority no further sites will be allocated to the area where Gypsies and Travellers mainly reside, whilst there is opposition to new sites in rural areas of the district due to the possible impact on wildlife and local roads. The settled community may frequently oppose developments such as new sites with which they are unfamiliar.
- 4.15 The settled community may hold preconceived ideas about Gypsies, Travellers and Travelling Showpeople which can lead to intolerance, prejudice and suspicion. This includes perceiving Gypsies and Travellers as engaging in criminal behaviour, damaging property, and leaving rubbish. Some Gypsy and Traveller households have been turned away from local authority recycling facilities.
- 4.16 Although there is a tendency for the relationship between Gypsies and Travellers, and the settled community, to be poor, it was noted that there are often good relations between households residing long-term on sites and the settled community. Also, it was suggested that a majority of the Gypsy and Traveller community reside in bricks and mortar accommodation alongside the settled community rather than on sites. It is important to recognise that there can be differences between different Gypsy and Traveller households.
- 4.17 In relation to improving the relationship between Gypsies, Travellers and the settled community, it was suggested that there needs to be a better understanding of cultural differences between the Gypsy and Traveller, and settled, communities. This could be achieved by: promoting positive stories through council websites; undertaking arts and heritage events; supporting communities to access resources or local services; and undertaking community engagement projects to encourage integration and inclusivity. Local authorities need to ensure that there is sufficient support for the Gypsy and Traveller community e.g. funding education support services. It was suggested the pre-application enquiries and/or interaction with elected members may better prepare Gypsy and Traveller families in submitting applications for new sites. This could also help gauge local support or opposition to new sites.

### **Health and education needs**

- 4.18 Stakeholders were asked if they were aware of any health, education or other service needs amongst the Gypsy and Traveller community. Some stakeholders were not aware of any specific issues, although it was suggested that the Gypsy and Traveller community have poor health and educational outcomes when compared to the settled community. In particular, stakeholders stated that members of the Gypsy and Traveller



community can have difficulty accessing health services including GP practices who may require a postcode before households can be registered. Some Gypsy and Traveller households have complex health needs. The Covid-19 pandemic has made access to health services more difficult whilst households may be less likely to be vaccinated. The pandemic has also reduced employment opportunities for nomadic households. Funding cuts have impacted on the Gypsy and Traveller community's access to education services. Some adults are illiterate and are dependent on literate community members to help them access services.

### **Cooperation and joint working**

4.19 Stakeholders were asked whether local authorities and agencies cooperate well on Gypsy and Traveller issues. It was suggested that the Black Country authorities are demonstrating good cooperation on Gypsy, Traveller and Travelling Showpeople issues by engaging with neighbouring local authorities on these matters and seeking input to the evidence base. However, there needs to be better cooperation between local authorities to meet transit needs and better communication with Gypsy and Traveller households to help determine suitable locations for transit sites. It was suggested that there could be a single body to deal with Gypsy and Traveller issues across the study area and liaise with key stakeholders such as landowners. It would also be useful for local authorities to adopt a common site management protocol. Finally, it was suggested that greater cooperation at senior officer and elected member levels would be welcome, as would a coherent police response to unauthorised encampments.

### **Summary**

4.20 The consultation with key stakeholders offered important insights into the main issues within the study area. According to stakeholders the main drivers of accommodation need were determined as: a lack of permanent and transit provision; families passing through the study area or attending events such as weddings or funerals in local areas; and a reluctance from some Gypsy and Traveller families to pay for transit provision.

4.21 However, it was suggested that some Gypsy and Traveller families may be looking for permanent accommodation within local areas. Some accommodation need may derive from households residing on sites in South Staffordshire with historical links to the Black Country. The main barriers to new provision cited by stakeholders included a lack of suitable land and finance.

4.22 Stakeholders stated that it can be difficult to determine suitable locations for new sites although ideally there should be provision in every local authority area. It may be useful to consider developing brown field sites first, and then consider greenfield options. It was acknowledged that there can be public opposition to proposed new sites and that it may be necessary to develop new sites away from residential areas.

- 4.23 The main reasons stated by stakeholders for unauthorised encampments taking place in the area included: a lack of available permanent pitches; travelling for work; and households temporarily moving through the study area; and to attend fairs of social events. It was suggested that the travelling community tend to travel in large groups when attending events such as Appleby Fair. They are more likely to travel during the summer months before returning to home bases during autumn and winter. The Impact of Covid-19 restrictions on reducing travelling and the number of unauthorised encampments was acknowledged. The main barriers to new transit provision are similar to those of permanent provision including lack of suitable sites; opposition from the settled community to new sites; and financial costs associated with maintaining and managing transit sites.
- 4.24 There can be tensions between the different traveller groups and the settled community. Planning applications for new sites and yards tend to attract opposition from the settled community. The settled community may hold preconceived ideas about Gypsies, Travellers and Travelling Showpeople which can lead to intolerance, prejudice and suspicion. Although there is a tendency for the relationship between Gypsies and Travellers, and the settled community, to be poor, it was noted that there are often good relations between households residing long-term on sites and the settled community.
- 4.25 There needs to be a better understanding of cultural differences between the Gypsy and Traveller, and settled, communities. This could be achieved by: promoting positive stories through council websites; undertaking arts and heritage events; supporting communities to access resources or local services; and undertaking community engagement projects to encourage integration and inclusivity. According to stakeholders, the Gypsy and Traveller community have poor health and educational outcomes when compared to the settled community. In particular, the Gypsy and Traveller community can have difficulty accessing health services including GP practices who may require a postcode before households can be registered. Some Gypsy and Traveller households have complex health needs.
- 4.26 The Black Country authorities demonstrate good cooperation on Gypsy, Traveller and Travelling Showpeople issues by engaging with neighbouring local authorities on these matters and seeking their input into the evidence base. However, there needs to be better cooperation between local authorities to meet transit needs and better communication with Gypsy and Traveller households to help determine suitable locations for transit sites. It was recommended that there could be a single body to deal with Gypsy and Traveller issues across the study area and liaise with key stakeholders such as landowners.

## 5. Gypsies and Travellers consultation

### Introduction

- 5.1 This chapter provides a snapshot of households residing in the study area at the time of the survey and an analysis of need for current and future pitches across the study area. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families (the accommodation needs of Travelling Showpeople are discussed in Chapter 6).
- 5.2 Table 5.1 below lists the number of authorised sites and pitches, sites and pitches on unauthorised developments, and sites and pitches with temporary planning permission per local authority within the study area. Every known authorised and unauthorised site was visited, and consultation with the households has taken into consideration the accommodation needs of every known pitch and site. Due to Covid-19 restrictions, a combination of direct consultation with households and proxy consultation with members of the community (including site owners, neighbours and relatives) was undertaken, some of which was undertaken over the phone. This resulted in over 90% response rate and data concerning accommodation need and occupancy confirmed of all known pitches and sites.

	Authorised		Unauthorised		Temporary		Transit	
	sites	pitches	sites	pitches	sites	pitches	sites	pitches
Dudley	4	38	1	4	0	0	2	45
Sandwell	1	16	0	0	0	0	1	34*
Walsall	7	36	0	0	1	4	0	0
Wolverhampton	2	42	2	14	0	0	0	0
Total	14	132	3	18	1	4	3	79

Source: Study area local authorities 2021

\* Please note that this refers to the maximum number of caravans which can be accommodated rather than pitches.

- 5.3 The consultation included questions regarding issues such as: family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and / or undeveloped pitches and future plans for pitches), travelling patterns, health, education and employment, and accommodation needs.
- 5.4 The number and location of pitches were determined using local authority data. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits and consultation with households helped to clarify the status of pitches i.e. which pitches are occupied by Gypsies and

Travellers, vacant pitches, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues.

5.5 All efforts were made to access households residing in bricks and mortar accommodation. The methods used in attempting to contact households residing in bricks and mortar accommodation included:

- Asking households residing on sites if they were aware of any relatives or friends residing in bricks and mortar accommodation;
- Contacting key stakeholders to request help to access Gypsies and Travellers living in bricks and mortar; and
- Seeking information about the location of households residing in bricks and mortar accommodation through the stakeholder interviews.

5.6 However, it was not possible to consult with any households residing in bricks and mortar accommodation. As such, an alternative method of determining the accommodation needs of Gypsy and Traveller households residing in bricks and motor accommodation was applied (see para. 5.44 below).

### **Site and pitch provision**

5.7 In October 2021 there were a total of 202 pitches within the study area consisting of 97 pitches located on local authority owned sites, 37 on privately owned sites, 79 transit pitches, 18 unauthorised pitches located on sites without planning permission, and 4 pitches with temporary planning permission. There are also 18 pitches no longer available to Gypsies and Travellers. This includes 9 of which are no longer occupied by Gypsies and Travellers and therefore counted as residential pitches, and 7 used as a storage and maintenance yard.

#### ***Dudley***

5.8 In Dudley there are 22 pitches located on local authority owned sites, 16 on privately owned sites, 45 transit pitches, and 4 located on unauthorised pitches without planning permission.

#### ***Sandwell***

5.9 There is one local authority site consisting of 16 pitches and one transit site consisting of 34 pitches.

#### ***Walsall***

5.10 Walsall consists of 19 pitches located on one local authority owned site, 11 on a private rental site, 6 on 5 private family sites, and 4 pitches on 1 site with temporary planning permission.

### **Wolverhampton**

- 5.11 In Wolverhampton there are 40 pitches located on local authority owned sites, 2 located on a privately owned site, and 14 pitches on two unauthorised developments.

### **Consultation**

- 5.12 Households stated that it is important for sites to have sufficient space and good facilities. Owning the land on which they reside with family living close by was regarded as ideal. Households owning their sites were more satisfied with the location and quality of sites compared with households residing on private rented sites, or sites owned by local authorities.
- 5.13 In particular, households owning sites were able to improve facilities or undertake repairs, compared to households on private or social rented sites who had to rely on the site owners or managers to undertake repairs or improvements. However, it was acknowledged that private and social rented sites play an important role in accommodating households unable to develop their own sites.
- 5.14 Households residing on unauthorised developments or temporary permission felt unable to invest in sites due to not having permanent planning permission. Some households residing on permanent sites commented on wanting to make improvements to their sites but were unable to do so due to a lack of finance or space.
- 5.15 As well having sufficient space and facilities on site, good access to local services including education, health, and retail facilities were also important to households. They spoke about how having a support network involving services such as health and education is essential for both the adult members of the household and children. The support network is an important reason as to why the family prefer to remain in the local area.
- 5.16 However, households stated that it is not important that these are close as long as they are accessible by car. Access to services for households without access to transport e.g. due to age or health issues was deemed problematic although such households were usually supported by family or neighbours. Households deemed it more important to reside on a site and for family members to reside close together than to have access to any particular service.
- 5.17 Education was regarded as an important element of life for the families. They spoke of how this was becoming more important amongst Gypsy and Traveller communities, including learning to read and write, and gaining skills and qualifications. They also spoke of the importance of every generation learning the culture and skills linked to way of life, and the importance of keeping their culture whilst at the same time gaining a good education. The families on the sites without permanent planning permission

commented on how their children's education was one reason why they would prefer to reside on a permanent site.

- 5.18 Employment was also regarded as important. Households spoke of how Gypsies and Travellers travel more if they are unable to gain sufficient employment locally. Households were primarily self-employed with some occupants employed locally, unemployed, or retired. With Covid-19 restrictions, self-employed households or those who travel for work have struggled to find work.
- 5.19 Gypsy and Traveller households in the study area travel primarily for cultural and social reasons. Some households also travel for work purposes including the buying and selling of horses, building and construction work, and garden and maintenance work. Some households spoke about how Gypsies and Travellers do not travel as much as they used to. This is because they may be employed locally, or children may attend local schools. Households suggested that it can be difficult to travel due to limited stopping places, being moved on, and the increasing costs of travelling. They also commented on how travelling is only part of their culture, and that it is not necessarily the act of travelling that is important but knowing that they can.
- 5.20 In relation to transit provision, whilst recognising the importance of having the transit provision that exists within the study area, and how some households with land spoke of being interested in developing transit provision, some form of negotiated stopping agreement was also regarded by households as an effective way of meeting the transit needs of Gypsies and Travellers visiting the area and to minimise unauthorised encampments. This would involve caravans being sited at suitable locations for an agreed and limited period of time, with possible provision of limited services. Also, households residing permanently on sites would like to be able to accommodate visiting family and friends for an agreed period of time.

### **Accommodation need**

- 5.21 Additional accommodation need in the first 5-year period (2021-26) derives from: households residing on unauthorised pitches or pitches with temporary planning permission requiring permanent permission; overcrowding on existing pitches; and new family formations. Accommodation need also derives from households residing in bricks and mortar accommodation. Households residing on sites and stakeholders commented on how it is important to determine this component of accommodation need.
- 5.22 Households with accommodation need stated their desire to stay with or close to family. No households residing on sites expressed an interest in residing in a house. Owners of sites with space to accommodate their own additional need are considering applying for planning permission to develop additional pitches.

### **Requirement for residential pitches 2021-2026<sup>17</sup>**

- 5.23 The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.2 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.
- 5.24 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides three accommodation needs figures: first, based on ethnic identity ('Ethnic' column); second, based on PPTS 2015 ('PPTS travel for all' column); and third, including the accommodation needs only of households who travel for work purposes ('travel for work' column).

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<sup>17</sup> Please note that due to rounding column totals may differ slightly from row totals

Table 5.2 Estimate of the need for permanent residential site pitches 2021-2026

	Ethnic	Travel for all	Travel for work
1) Current occupied permanent residential site pitches	132	132	132
<i>Additional residential supply</i>			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	4	4	4
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	4	4	4
<i>Additional residential need</i>			
7) Seeking permanent permission from temporary sites	4	4	2
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	18	14	7
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	12	8	4
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	51	36	18
15) Family units in housing but with a psychological aversion to housed accommodation	14	0	0
Total Need	99	62	31
<i>Balance of Need and Supply</i>			
Total Additional Pitch Requirement	95	58	27
Annualised Additional Pitch Requirement	19	12	5

Source: GTAA 2022

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

5.25 Information from local authorities and the census plus evidence from the survey was used to inform the calculations including:

- The number of Gypsies and Travellers housed in bricks and mortar accommodation
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches



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

### **Supply of pitches 2021-2026**

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

#### ***Step 1: Current occupied permanent site pitches***

5.28 Based on information provided by the councils and corroborated by site visits and household surveys, there are currently 132 occupied authorised Gypsy and Traveller pitches in the study area.

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

5.29 There are currently 0 vacant pitches.

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

5.30 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.<sup>18</sup> This results in the supply of 4 pitches.

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

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

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

5.32 This is determined by survey data. It was assumed that all those currently residing on sites planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. This resulted in a supply of 0.

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

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<sup>18</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987. NB: For Travelling Showpeople, the standard mortality rate is used.

5.33 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches include those which have been partly developed or which were previously occupied but are currently not occupied and in need of redevelopment. There are no such sites / pitches in the Black Country.

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

5.34 This needs assessment provides three accommodation needs figures: first, based on ethnic identity ('Ethnic' column); second, based on PPTS 2015 ('PPTS travel for all' column); and third, including the accommodation needs only of households who travel for work purposes ('travel for work' column).

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

5.35 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2021-2026 will still require accommodation within the study area. There are currently 4 pitches with temporary planning permission located in the study area.

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

5.36 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.

5.37 This category of accommodation need overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need of 0 pitches in the study area.

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

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

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

- 5.39 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 0 households surveyed on unauthorised encampments within the study area during the survey period.

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

- 5.40 From consultation and data from the councils there are 18 unauthorised developments (including those pitches regarded by the local authority as tolerated) in the study area. This will result in the need of 18 residential pitches over the period 2021-2026 ('ethnic definition'), 14 pitches ('PPTS travel for all' definition), and 7 pitches ('travel for work' definition).

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

- 5.41 There is a need for 12 new households requiring residential pitches over the period 2021-2026 ('ethnic definition'), 8 pitches ('PPTS travel for all' definition), 4 pitches ('travel for work' definition). Overcrowding can occur either because either there are too few caravan spaces sufficient to accommodate household members, or because the pitch size is too small to accommodate the required number of caravans. Also, overcrowding may occur due to 'hidden' households or households 'doubling up'.

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

- 5.42 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. Together, these amount to a net inflow of 0 units in the study area.

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

- 5.43 The number of individuals needing to leave pitches to create new family units was estimated from survey data. Allowing for those planning to leave the area, and for estimated rates of marriages to both Gypsies and Travellers and non-Gypsies and Travellers. This will result in the formation of 52 new households requiring residential pitches over the period 2021-2026 ('ethnic definition'), 36 pitches ('PPTS travel for all' definition), 18 pitches ('travel for work' definition).

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

- 5.44 Whilst not a medical condition 'psychological aversion' is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.
- 5.45 This was determined firstly by estimating the number of houses occupied by Gypsies and Travellers. Work undertaken by Shelter (2005) estimates that between one-half to two-thirds of the Gypsy and Traveller population reside in bricks and mortar accommodation. From previous GTAA's undertaken by *RRR Consultancy Ltd* it is estimated that 10% of Gypsies and Travellers residing in bricks and mortar accommodation experience psychological aversion and require accommodating on sites. This was based on previous GTAA's undertaken by *RRR Consultancy*. Local Plan examinations already undertaken have found the GTAA's to be sound.
- 5.46 Table 5.3 shows the number of authorised pitches in each local authority area. The number of households whose accommodation needs derives from psychological aversion is determined by applying a 10% multiplier to the number of households residing on authorised pitches as determined by the 2021 GTAA.

Table 5.3 Accommodation need deriving from psychological aversion 2021-2026

	Pitches on auth. sites	10%	Rounded
Dudley	38	3.8	4
Sandwell	16	1.6	2
Walsall	36	3.6	4
Wolverhampton	42	4.2	4
Total	132	13.2	14

Source: GTAA 2022

Please note that although the figures in the 'rounded' column are correct, the total figure in the '10%' column is slightly lower.'

- 5.47 Please note that accommodation need arising from psychological aversion is only considered as part of the 'ethnic' accommodation needs figures and not in relation to households who meet the 'PPTS travel for all' or 'PPTS travel for work' definitions. This will result in the formation of 14 new households requiring residential pitches over the

period 2021-2026 ('ethnic definition'), 0 pitches ('PPTS' definition), and 0 pitches ('work' definition).

### **Balance of Need and Supply**

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

Table 5.4 Summary of Gypsy and Traveller pitch needs 2021-26			
	Ethnic	PPTS Travel for all	PPTS Travel for work
Supply	4	4	4
Need	99	62	31
Difference	95	58	27

Source: GTAA 2022

### **Requirement for residential pitches 2021-2026 per authority**

5.49 The following breaks down the supply and need for each of the local authorities which form the study area.

## Dudley

Table 5.5 Estimate of the need for permanent residential site pitches 2021-2026			
	Ethnic	PPTS	PPTS Work
1) Current occupied permanent residential site pitches	38	38	38
<b><i>Additional residential supply</i></b>			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality 2021-2026	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use 2021-2026	0	0	0
Total Additional Supply	1	1	1
<b><i>Additional residential need</i></b>			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	4	4	2
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	15	10	5
15) Family units in housing but with a psychological aversion to housed accommodation	4	0	0
Total Need	23	14	7
<b><i>Balance of Need and Supply</i></b>			
Total Additional Pitch Requirement	22	13	6
Annualised Additional Pitch Requirement	4	3	2

Source: GTAA 2022

## Sandwell

Table 5.6 Estimate of the need for permanent residential site pitches 2021-2026			
	Ethnic	PPTS	PPTS Work
1) Current occupied permanent residential site pitches	16	16	16
<i>Additional residential supply</i>			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality 2021-2026	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use 2021-2026	0	0	0
Total Additional Supply	1	1	1
<i>Additional residential need</i>			
7) Seeking permanent permission from temporary sites			
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	0	0	0
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	8	6	3
15) Family units in housing but with a psychological aversion to housed accommodation	2	0	0
Total Need	10	6	3
<i>Balance of Need and Supply</i>			
Total Additional Pitch Requirement	9	5	2
Annualised Additional Pitch Requirement	2	1	0

Source: GTAA 2022

## Walsall

Table 5.7 Estimate of the need for permanent residential site pitches 2021-2026			
	Ethnic	PPTS	PPTS Work
1) Current occupied permanent residential site pitches	36	36	36
<i>Additional residential supply</i>			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality 2021-2026	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use 2021-2026	0	0	0
Total Additional Supply	1	1	1
<i>Additional residential need</i>			
7) Seeking permanent permission from temporary sites	4	4	2
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	0	0	0
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	6	4	2
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	13	10	5
15) Family units in housing but with a psychological aversion to housed accommodation	4	0	0
Total Need	27	18	9
<i>Balance of Need and Supply</i>			
Total Additional Pitch Requirement	26	17	8
Annualised Additional Pitch Requirement	5	4	2

Source: GTAA 2022



## Wolverhampton

Table 5.8 Estimate of the need for permanent residential site pitches 2021-2026			
	Ethnic	PPTS	PPTS Work
1) Current occupied permanent residential site pitches	42	42	42
<i>Additional residential supply</i>			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality 2021-2026	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use 2021-2026	0	0	0
Total Additional Supply	1	1	1
<i>Additional residential need</i>			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	14	10	5
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	6	4	2
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	15	10	5
15) Family units in housing but with a psychological aversion to housed accommodation	4	0	0
Total Need	39	24	12
<i>Balance of Need and Supply</i>			
Total Additional Pitch Requirement	38	23	11
Annualised Additional Pitch Requirement	8	5	2

Source: GTAA 2022

## Requirement for residential pitches 2026-2039

5.50 Considering future accommodation need it assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area accommodation need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.9 below. Please note that the 2021 base figures include both authorised occupied and vacant pitches, whilst the 2026 base figures assume that any potential pitches have been developed.

5.51 2026 pitch base figures are determined by a number of factors including:

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

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

- Occupied pitches in 2021 (132) + vacant pitches (0) + potential pitches (0) + additional needs 2021-2026 (96) = 228 pitches.

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

Table 5.9 Base figures for pitches as of 2026 assuming all need is met for 2021-2026

	2021 Base	Vacant	Potentials 2021-26	Need 2021-26	2026 Base
Ethnic	132	0	0	95	227
PPTS	132	0	0	58	190
Work	132	0	0	27	159

Source: GTAA 2022

## Accommodation needs 2026-39

- 5.54 Considering future need, only natural population increase, mortality, and movement into and out of the study area need be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.10 below. Please note that the 2021 base figures include both authorised occupied and vacant plots, whilst the 2026 base figures assume that any potential plots have been developed.
- 5.55 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.8% per annum (compound) equating to a 5-year rate of 14.8% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. It is assumed that these rates are likely to continue during the period 2026-2039.
- 5.56 The following table summarises the accommodation need for the study area for the periods 2026-2031, 2031-2036, and 2036-2039.

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2026-31	27	23	18
Total 2031-36	30	26	21
Total 2036-39	20	17	14

Source: GTAA 2022

## Requirements for transit pitches / negotiated stopping arrangements

- 5.57 In relation to transit provision, it is noted that transit provision already exists in Sandwell and Dudley, Wolverhampton has identified a potential transit site which has planning permission, and a transit site in Walsall is under construction. It is recommended that all of the local authorities within the study area consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that all of local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or countywide basis.
- 5.58 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants

or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).

- 5.59 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

## Summary

- 5.60 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. Accommodation needs resulting from the calculations in the tables above for the study area and the 4 constituent local authorities.

## Study Area

Table 5.11: Summary of accommodation needs 2021-39 (pitches)

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	95	58	27
Total 2026-31	27	23	18
Total 2031-36	30	26	21
Total 2036-39	20	18	15
Total 2021-39	172	125	81

Source: GTAA 2022

## Dudley

Table 5.12: Summary of accommodation needs 2021-39 (pitches)

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	22	13	6
Total 2026-31	7	6	5
Total 2031-36	8	7	6
Total 2036-39	5	5	4
Total 2021-39	42	31	21

Source: GTAA 2022

**Sandwell**

Table 5.13: Summary of accommodation needs 2021-39 (pitches)

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	9	5	2
Total 2026-31	3	3	2
Total 2031-36	3	3	2
Total 2036-39	2	2	2
Total 2021-39	17	13	8

Source: GTAA 2022

**Walsall**

Table 5.14: Summary of accommodation needs 2021-39 (pitches)

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	26	17	8
Total 2026-31	7	6	5
Total 2031-36	8	7	6
Total 2036-39	6	5	4
Total 2021-39	47	35	23

Source: GTAA 2022

**Wolverhampton**

Table 5.15: Summary of accommodation needs 2021-39 (pitches)

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	38	23	11
Total 2026-31	10	8	6
Total 2031-36	11	9	7
Total 2036-39	7	6	5
Total 2021-39	66	46	29

Source: GTAA 2022

## 6. Travelling Showpeople consultation

### Introduction

- 6.1 As described in Chapter 1, this GTAA considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. Nonetheless, government guidance (DCLG Planning Policy for Traveller Sites August 2015) indicates that local authorities should consider the accommodation needs of Travelling Showpeople families. As such, they have been included in this report.
- 6.2 There are 15 Travelling Showpeople yards located within the study area consisting of 101 authorised plots. Table 6.1 below lists the number of authorised plots and yards, and unauthorised developments (UD) (yards and plots), and yards and plots with temporary planning permission per local authority within the study area.

Table 6.1 Travelling Showpeople yards and plots per authority						
	Yards	Plots	UD yards	UD plots	Temp yards	Temp plots
Dudley	1	11	0	0	0	0
Sandwell	5	18	0	0	0	0
Walsall	8	68	0	0	0	0
Wolverhampton	1	4	0	0	0	0
Total	15	101	0	0	0	0

Source: Study area local authorities

- 6.3 Consultation was undertaken in relation to over 90% of Travelling Showpeople households residing in the study area on authorised plots, with all (100%) known plots being taken into account in the assessment. Due to Covid-19 restrictions, consultation was undertaken with the assistance of the Showmen's Guild of Great Britain and the Association of Circus Proprietors of Great Britain. The consultation included questions regarding issues such as: family composition (per plot), occupancy of existing plots (including number of and reasons for vacant and /or undeveloped plots and future plans for plots), management and suitability of current yards and plots (including facilities and services), travelling patterns, and accommodation needs.

### Consultation

- 6.4 Travelling Showpeople households residing on study area yards and plots are involved in differing activities including running circuses, fairgrounds, and concession stands.

Some households consisted of retired Travelling Showpeople. Most households had worked in the study area (and beyond) for generations.

- 6.5 Most households have lived on their respective yard since it was first developed and in some cases household members were born on the yard. Three generations of the same family are residing on some plots leading to overcrowding and the need for separate accommodation for some newly forming households.
- 6.6 Household size on each plot varied between 1 and 14 persons. The age of individuals ranged from a new-born to retirement age. Some individuals and households reside on yards all year round, whilst others use the yards as a base. Since March 2020, Covid-19 restrictions have led to more Showpeople residing on plots all year leading to further overcrowding. Also, Showpeople yards may need to accommodate long- and short-term employees.
- 6.7 Families being able to live together with sufficient space to store and maintain equipment is key importance to households. The yards primarily have good access to services such as education, health, and retail facilities. However, the need for additional space in which to store and maintain equipment, and to accommodate growing families, was highlighted as a key concern.
- 6.8 Some yards have space to accommodate more plots and/or households are able to purchase land to accommodate additional need (dependent on planning consent). Some households and organisations such as the Showmen's Guild are interested in discussing options as to how accommodation needs can be met with the relevant planning authorities.
- 6.9 Showpeople regard education as an important element of life for the families. Also, the importance of managing a good balance between their children gaining a good education and learning the culture and tradition of the families.
- 6.10 Employment was also regarded as important. Every plot contains self-employed Showpeople with a few individuals undertaking different types of work locally. Covid-19 restrictions have meant that some households have been unable to work or receive financial support. This has resulted in more households seeking alternative work on a temporary basis.
- 6.11 The Showpeople households residing on study area yards travel mainly for work. However, households tend to travel less often and, generally, not as far as they used to. This is because a larger proportion of families are mainly work at local events and

venues, or at least within a reasonable distance which enables them to travel to and from yards. Covid-19 restrictions meant that many families were unable to travel or work during 2020 and 2021. Many are concerned that the same Covid-19 related issues will have similar impact on them and their livelihoods in 2022.

- 6.12 When the yards were initially developed there was sufficient space for both accommodation and equipment. However, an increasing number of people occupying the yards and larger equipment means that the yards are not large enough for both accommodation and storage. There is overcrowding on plots resulting in need for an additional 23 plots during the first 5-year period (2021-26); and 20 additional plots needed due to newly forming households. There are no known unauthorised developments.

### **Calculation of Accommodation Need**

- 6.13 The need for permanent plots for Showpeople in the study area is based on the model suggested in DCLG (2007) guidance and supplemented by data provided by the local authorities. It provides calculation of accommodation need for the period of 2021-2039 in 5-year periods.
- 6.14 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition of Travelling Showpeople. However, as all households travel and all meet both the PPTS definition and the work interpretation, only one needs figure is provided.

### **Requirement for residential plots 2021-2026**

- 6.15 The need for residential plots in the area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 6.2 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.
- 6.16 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition of Travelling Showpeople. However, as all households travel and all meet both the PPTS definition and the work interpretation, only one needs figure is provided.



Table 6.2 Estimate of the need for permanent residential yard plots 2021-2026	
1) Current occupied permanent residential site plots	101
<i>Additional residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2021-2026	3
4) Net number of family units on yards expected to leave the area in next 5 years	0
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2021-2026	0
Total Additional Supply	3
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary yards	0
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots	0
11) Family units on unauthorised developments requiring residential plots	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing emerging family unit in step 8	23
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units	20
Total Need	43
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	40
Annualised Additional Plot Requirement	8

Source: GTAA 2022

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

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

- The number of existing plots
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary plots
- The number of vacant plots
- The number of planned or potential new plots
- The number of transit plots

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

## **Supply of plots 2021-2026**

### ***Step 1: Current occupied permanent plots***

6.19 Based on information provided by the Council and corroborated by information from plot surveys. There are currently 101 authorised plots in the study area. All were occupied at the time of the consultation.

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

6.20 As the plots are all occupied there are 0 unused plots.

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

6.21 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. It then calculates the number of plots that would become vacant as a result of the mortality. This results in an additional supply of 3 plots.

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

6.22 This was determined by survey data. It was assumed, that those currently residing on plots expecting to leave the area permanently in the next five years – out of choice (step 4) or due to overcrowding (step 12) – would generally be able to do so. Given that the plots are not currently occupied and that none of the intended households indicated they would be leaving the study area, this resulted in the supply of 0 plots.

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

6.23 This was determined by survey data. It was assumed that all those currently residing on plots planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded plot (step 12), would be able to do so.

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

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

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

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

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

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

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

6.27 This was determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised plot, or that they were currently seeking accommodation.

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

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

6.29 This generates a total need of 0 plots.

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

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

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

6.31 There are no unauthorised plots in the study area and therefore there is a need of 0 plots.

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

6.32 Overcrowding on a Travelling Showpeople plot may differ to that on Gypsy and Traveller pitch due to the larger need for equipment and vehicle storage. Showpeople require more space for their equipment and vehicles as well as enough space for accommodation such as caravans (static and tourers). This generates a total need of 23 plots in the study area.

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

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

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

6.34 This generates a total need of 20 plots in the study area.

**Balance of Need and Supply**

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

Table 6.3: Summary of Travelling Showpeople plot needs 2021-26

Supply	3
Need	43
Difference	40

Source: GTAA 2022

**Requirement for residential plots 2021-2026 per authority**

6.36 The following breaks down the supply and need for each of the local authorities which form the study area.

**Dudley**

Table 6.4 Estimate of the need for permanent residential yard plots 2021-2026	
1) Current occupied permanent residential site plots	11
<i>Additional residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2021-2026	0
4) Net number of family units on yards expected to leave the area in next 5 years	0
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2021-2026	0
Total Additional Supply	0
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary yards	
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots	0
11) Family units on unauthorised developments requiring residential plots	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing emerging family unit in step 8	8
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units	7
Total Need	15
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	15
Annualised Additional Plot Requirement	3

Source: GTAA 2022

**Sandwell**

Table 6.5 Estimate of the need for permanent residential yard plots 2021-2026	
1) Current occupied permanent residential site plots	18
<i>Additional residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2021-2026	1
4) Net number of family units on yards expected to leave the area in next 5 years	0
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2021-2026	0
Total Additional Supply	1
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary yards	0
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots	0
11) Family units on unauthorised developments requiring residential plots	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing emerging family unit in step 8	13
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units	8
Total Need	21
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	20
Annualised Additional Plot Requirement	4

Source: GTAA 2022

**Walsall**

Table 6.6 Estimate of the need for permanent residential yard plots 2021-2026	
1) Current occupied permanent residential site plots	68
<i>Additional residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2021-2026	2
4) Net number of family units on yards expected to leave the area in next 5 years	0
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2021-2026	0
Total Additional Supply	2
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary yards	0
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots	0
11) Family units on unauthorised developments requiring residential plots	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing emerging family unit in step 8	2
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units	4
Total Need	6
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	4
Annualised Additional Plot Requirement	1

Source: GTAA 2022

**Wolverhampton**

Table 6.7 Estimate of the need for permanent residential yard plots 2021-2026	
1) Current occupied permanent residential site plots	4
<i>Additional residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2021-2026	0
4) Net number of family units on yards expected to leave the area in next 5 years	0
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2021-2026	0
Total Additional Supply	0
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary yards	0
8) Family units (on plots) seeking residential plots in the area, excluding those counted as moving due to overcrowding in step 12	0
9) Family units on transit plots requiring residential plots in the area	0
10) Family units on unauthorised encampments requiring residential plots	0
11) Family units on unauthorised developments requiring residential plots	0
12) Family units currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing emerging family unit in step 8	0
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units	1
Total Need	1
<i>Balance of Need and Supply</i>	
Total Additional Plot Requirement	1
Annualised Additional Plot Requirement	0

Source: GTAA 2022

**Requirement for residential plots 2026-2039**

- 6.37 Considering future need, only natural population increase, mortality, and movement into and out of the study area need be considered. The base figures regarding the number of plots on sites at the end of the first 5-year period are shown in Table 6.8 below. Please note that the 2021 base figures include both authorised occupied and vacant plots, whilst the 2026 base figures assume that any potential plots have been developed.
- 6.38 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.5% per annum (compound) equating to a 5-year rate of 13.1% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. It is assumed that these rates are likely to continue during the period 2026-2039.



Table 6.8: Summary of accommodation needs 2026-39 (plots)

Total 2026-31	15
Total 2031-36	16
Total 2036-39	10

Source: GTAA 2022

## Summary

- 6.39 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Travelling Showpeople plots. Accommodation need resulting from the calculations in the tables above are as follows:

### Study area

Table 6.9: Summary of accommodation needs 2021-39 (plots)

Total 2021-26	40
Total 2026-31	15
Total 2031-36	16
Total 2036-39	10
Total 2021-39	81

Source: GTAA 2022

### Dudley

Table 6.10: Summary of accommodation needs 2021-39 (plots)

Total 2021-26	15
Total 2026-31	3
Total 2031-36	3
Total 2036-39	2
Total 2021-39	23

Source: GTAA 2022

### Sandwell

Table 6.11: Summary of accommodation needs 2021-39 (plots)

Total 2021-26	20
Total 2026-31	4
Total 2031-36	4
Total 2036-39	3
Total 2021-39	31

Source: GTAA 2022

## Walsall

Table 6.12: Summary of accommodation needs 2021-39 (plots)	
Total 2021-26	4
Total 2026-31	7
Total 2031-36	8
Total 2036-39	5
Total 2021-39	24

Source: GTAA 2022

## Wolverhampton

Table 6.13: Summary of accommodation needs 2021-39 (plots)	
Total 2021-26	1
Total 2026-31	1
Total 2031-36	1
Total 2036-39	0
Total 2021-39	3

Source: GTAA 2022

## 7. Conclusion and recommendations

### Introduction

- 7.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new provision, facilities, and recording and monitoring processes.
- 7.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the needs of Gypsy and Traveller sites and Travelling Showpeople, and then concludes with key recommendations.

### Policy Changes

- 7.3 In August 2015 the DCLG published 'Planning Policy for Traveller Sites' (including Travelling Showpeople yards). It states that for the purposes of 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.*

- 7.4 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.
- 7.5 In March 2016 the then Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances including, for example caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.

- 7.6 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, deletes sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers, Travelling Showpeople, boat dwellers and residential caravan dwellers.

### Accommodation needs

- 7.7 The following outlines the accommodation needs in relation to Gypsies and Travellers (Table 7.1) and Travelling Showpeople (Table 7.2) for the period 2021-2039.

#### *Gypsies and Travellers*

Period	Ethnic definition	PPTS 2015 'travel for all'	PPTS 2015 'travel for work'
Total 2021-26	95	58	27
Total 2026-31	27	23	18
Total 2031-36	30	26	21
Total 2036-39	20	18	15
Total 2021-39	172	125	81

Source: GTAA 2022

#### *Travelling Showpeople*

Total 2021-26	40
Total 2026-31	15
Total 2031-36	16
Total 2036-39	10
Total 2021-39	81

Source: GTAA 2022

### The location of new provision

- 7.8 This is general consensus that smaller sites and yards are preferred by Gypsy, Traveller, Showpeople, and residential caravan dweller communities due to better management and maintenance of provision and security. Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities

alongside discussions with different community groups, to ensure that any additional need that may arise is identified.

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

7.10 In terms of identifying broad locations for new permanent sites and yards, there are a number of factors which could be considered including:

*Costs*

- How do land costs impact on feasibility i.e. is it affordable?
- Implementation of services – is it possible for the new site to connect to nearby? mains services e.g. electricity, gas, water or sewerage?
- Can good drainage be ensured on the new provision?

*Social*

- Does the proposed location of the new provision lie within a reasonable distance of school catchment areas?
- Sustainability – is the proposed location close to existing bus routes?
- Proximity of social and leisure services – is the proposed location close to leisure facilities such as sports centres, cinemas etc. or welfare services such as health and social services etc.

*Availability*

- Who owns the land and are they willing to sell / rent?
- Is access easy or will easements across other land be needed both for residents and services/utilities?
- Are utilities close enough to service the provision at realistic prices?

*Deliverability*

- Does the proposed location meet existing general planning policy in terms of residential use, (for example in relation to Green Belt, flooding and the historic environment)?
- Can the owner sell the land easily and quickly?
- Can utilities connect to the proposed provision?
- Can highways connect to the proposed provision?

- 7.11 It is important that new provisions are located close to amenities such as shops, schools and health facilities or where there are good transport links or within reasonable distance for households to access the necessary facilities and amenities. DCLG (2015) guidance suggests that local planning authorities should strictly limit new Gypsy and Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure. As stated in Chapter 2, the study area local authority Local Plan policies contain locational criteria to help determine suitable locations for the development of new sites or yards.
- 7.12 The DCLG (2015) guidance states that when considering applications, local planning authorities should attach weight to the following matters:
- a. effective use of previously developed (brownfield), untidy or derelict land
  - b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
  - c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
  - d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community
- 7.13 In some cases, it may be necessary for the identified need to be met outside of the local authority where it arises, and local planning authorities should work together under the Duty to Co-operate where this is the case. For example, if a household is unable to gain planning permission or find a site or yard in the local area, they might have to consider alternative options in neighbouring or nearby local authorities.
- 7.14 One option is to provide new pitches as part of sustainable urban extensions. Local authorities may choose to include a requirement for Gypsy and Traveller pitches to be included in an urban extension and stipulate that they are developed in that location because it has good access to schools, shops, community facilities and places of employment. There are yet no examples of local authorities successfully developing new Gypsy and Traveller pitches as part of urban extensions. However, some local authorities have incorporated the principle into local planning policies including Mid Devon District Council, Charnwood Borough Council, and Worcester City Council.

## **The size of new provision**

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

### **Gypsy and Traveller pitches**

7.16 DCLG (2008) guidance states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.

7.17 Based on previous and current DCLG guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500 square metres (0.05ha) would comfortably accommodate the following on-pitch facilities:

- Hard standing for a touring caravan (enabling households to travel)
- Hard standing for a static caravan (including double static trailers)
- 2 car parking spaces
- 1 amenity block
- Hard standing for storage shed and drying
- Garden/amenity area

7.18 If granting permission on an open plan basis, permission should be given on a pitch-by-pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, 2 touring caravans and 1 – 2 static caravans along with 4 parking spaces, 2 blocks etc., could be counted as 2 pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

### **Showpeople plots**

7.19 New plots need to provide sufficient space for work equipment as well as space for residential accommodation. This includes space situated away from the living quarters for the storage and maintenance of work equipment and vehicles, as well as space to accommodate domestic vehicles. Due to the need for both accommodation

space and space for the storage and maintenance of large equipment, Showpeople plots tend to be much larger than Gypsy and Traveller pitches.

### **Transit provision**

- 7.20 It should be noted that transit provision already exists in Sandwell and Dudley, Wolverhampton has identified a potential transit site which has planning permission, and a transit site in Walsall is under construction. Given the new Police, Crime, Sentencing and Courts Bill (2021), it is recommended that Wolverhampton proceed with the development of a transit site. It is also recommended that all of the local authorities within the study area consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that all of local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or countywide basis.
- 7.21 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community.

### **Summary**

- 7.22 This report provides the assessment of levels of accommodation need needed by Gypsies, Travellers, and Showpeople. It is then for local authorities to determine how they will each respectively use the information provided this report and address the needs via their respective local plans.
- 7.23 Local Plans have to adhere to the National Planning Policy Framework (NPPF) (July 2021), PPTS (2015), and the Equalities Act (2010). As such, in relation to Gypsies and Travellers, it is recommended that the Council incorporate both the PPTS and the ethnic calculations into their local plan. It is recommended that the local authorities incorporate both the PPTS and the ethnic calculations into their Local Plans. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also able to demonstrate that how accommodation need for those who do not meet the PPTS definition are being addressed. It is important to note that this only refers to Gypsies and Travellers and not Travelling Showpeople.
- 7.24 The local authorities may also need to consider additional accommodation need not identified at the time of the assessment and therefore not included in calculation of need for this assessment, or accommodation need which may materialise over the



local plan period. For example, the accommodation needs of households not included in the calculation of need as part of this assessment (i.e. not living in bricks and mortar, on known authorised or unauthorised sites, encampments or transit provision, or from outside of the study area) should be considered separate to the need identified in this assessment. Such additional accommodation needs could be met through windfall allocations.

7.25 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:

*Planning policy:*

- To consider if it is appropriate to adopt a short-term negotiated stopping policy, although it is acknowledged that this falls outside the planning process.
- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.
- To consider alternative options for developing new sites and yards such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

*Management:*

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller, and Travelling Showpeople communities.

- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller, Travelling Showpeople and boat dweller communities.
- During the ongoing Covid-19 related restrictions placed on the communities, determine help and support the council and other services could provide to the households
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change. As such, their accommodation needs should be reviewed every 5 to 7 years.

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# Glossary

## **Amenity block**

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

## **Authorised site**

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

## **Average**

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

## **Bedroom standard**

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers residing on sites to take into account that caravans or mobile homes may contain both bedroom and residing spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

## **Bricks and mortar accommodation**

Permanent housing of the settled community, as distinguished from sites.

## **Caravan**

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

## **Concealed household**

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

**Doubling up**

More than one family unit sharing a single pitch.

**Emergency stopping places**

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

**Family Owner Occupied Gypsy Site**

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

**Family unit**

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Gypsy**

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

**Gypsy and Traveller**

As defined by DCLG Planning Policy for Traveller Sites (August 2015):

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

The DCLG guidance also states that in determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life

c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

**Household**

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Irish Traveller**

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

**Local Authority Sites**

The majority of local authority sites are designed for permanent residential use.

**Local Development Documents (LDD)**

Local Plans and other documents that contain planning policies and are subject to external examination by an Inspector. It is important to note that Supplementary Planning Documents (SPDs) contain guidance and are not subject to Examination. Planning applications are determined in relation to an adopted Development Plan which contains documents found to be sound at an External Examination.

**Negotiated Stopping**

The term 'negotiated stopping' is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

**Net need**

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

**New Traveller** (formerly 'New Age Traveller')

Member of the settled community who has chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

### **Newly forming families**

Families residing as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

### **Overcrowding**

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

### **Permanent residential site**

A site intended for long-stay use by residents. It has no maximum length of stay but often constraints on travelling away from the site.

### **Pitch**

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

### **Plot**

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

### **Primary data**

Information that is collected from a bespoke data collection exercise (e.g. surveys, focus groups or interviews) and analysed to produce a new set of findings.

### **Private rented pitches**

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

### **Psychological aversion**

Whilst not a medical condition this is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.



**Secondary data**

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

**Settled community**

Used to refer to non-Gypsies and Travellers who live in housing.

**Site**

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident, or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

**Socially rented site**

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offered at below private market levels.

**Tolerated**

An unauthorised development or encampment may be tolerated by the local authority meaning that no enforcement action is currently being taken.

**Transit site/pitch**

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

**Travelling Showpeople**

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

**Unauthorised development**

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

**Unauthorised encampment**

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

**Unauthorised site**

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.