



# **GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE ACCOMMODATION ASSESSMENT**

For – Babergh

- Ipswich
- Mid Suffolk
- Suffolk Coastal
- Waveney



October 2013



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# 1. Introduction

## The Survey

- 1.1 Opinion Research Services (ORS) were commissioned by five of the seven Suffolk local authorities to undertake a Gypsy and Traveller Accommodation Assessment.
- 1.2 The main objective of this study is to provide robust, defensible and up to date evidence about the accommodation needs of Gypsies and Travellers in those parts of Suffolk during the period until 2027 in five year sections covering 2012-2017, 2017-2022 and 2022-2027. It also required the identification of whether any extra site provision should be on public or private sites, and whether or not any of the local authorities need to plan for the provision of transit sites or emergency stopping places.
- 1.3 We would note at the outset that the study also includes the needs of New Travellers and Travelling Showpeople, but for short hand ease of use we have referred to the study as a Gypsy and Traveller Accommodation Assessment.
- 1.4 A secondary objective was to assess the needs of people living on existing sites in terms of any extra service provision that may be required. The study also seeks to highlight how Government planning guidance for Gypsy and Traveller sites will impact upon the planning and housing strategies employed by the local authorities.
- 1.5 The commissioning partners were:
  - Babergh District Council;
  - Ipswich Borough Council;
  - Mid Suffolk District Council;
  - Suffolk Coastal District Council; and
  - Waveney District Council.
- 1.6 The County of Suffolk also includes the local authorities of Forest Heath and St Edmundsbury. Their most recent Gypsy and Traveller accommodation assessment was undertaken as part of the Cambridgeshire sub-region study in 2011 and therefore they are not included within this study. The Cambridgeshire study shows a need for 30 pitches in Forest heath and 12 pitches in St Edmundsbury in the period 2011-2031.
- 1.7 This document is the main report and summarises the key findings of the study in particular where they relate to existing policies or have implications for future policy decisions across Suffolk.

## Legislation and Guidance for Gypsies and Travellers

- 1.8 Decision making for policy concerning Gypsies & Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation

and guidance. For example, the following pieces of legislation and guidance are relevant when constructing policies relating to Gypsies & Travellers and Showpeople:

- Planning Policy for Traveller Sites 2012;
- National Planning Policy Framework 2012;
- Gypsy and Traveller Accommodation Needs Assessments Guidance October 2007;
- Environmental Protection Act 1990 for statutory nuisance provisions;
- The Human Rights Act 1998, when making decisions and welfare assessments;
- The Town and Country Planning Act 1990 (as subsequently amended);
- Homelessness Legislation;
- Housing Allocation Policies within housing Act;
- Criminal Justice and Public Order Act 1994 (sections 61, 62);
- Anti-social behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour);
- Planning and Compulsory Purchase Act 2004;
- Housing Act 2004 which requires local housing authorities to assess the accommodation needs of Gypsies & Travellers and Showpeople as part of their housing needs assessments. This study complies with this element of government guidance;
- Housing Act 1996 in respect of homelessness
- Equalities Act 2010.

<sup>1.9</sup> To focus on Gypsies and Travellers, the Criminal Justice and Public Order Act 1994 (Sections 61, 62) is particularly important with regard to the issue of planning for Gypsy and Traveller site provision. This repealed the duty of local authorities to provide appropriate accommodation for Gypsies and Travellers. However, Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.

<sup>1.10</sup> For site provision, the previous Government guidance focused on increasing site provision for Gypsies and Travellers and encouraging local authorities to have a more inclusive approach to Gypsies and Travellers within their housing needs plans. The Housing Act 2004 required local authorities to identify the need for Gypsy and Traveller sites, alongside the need for other types of housing, when conducting Housing Needs Surveys. Therefore all local authorities were required to undertake accommodation assessments for Gypsies and Travellers either as a separate study such as this one, or as part of their main Housing Needs Assessment.

<sup>1.11</sup> Local authorities were encouraged rather than compelled to provide new Gypsy and Traveller sites by central government. Circular 1/06 'Planning for Gypsy and Traveller Caravan Sites', released by the DCLG in January 2006, replaced Circular 1/94 and suggested that the provision of authorised sites should be encouraged so that the number of unauthorised sites would be reduced. For Travelling Showpeople. Circular 04/07 'Planning for Travelling Showpeople' replaced the 1991 Circular 22/91 'Planning and Travelling Showpeople'.

- 1.12 The Coalition Government announced that the previous government's thinking contained in Planning for Gypsy and Traveller Caravan Sites (Circular 01/06) was to be repealed, along with the Regional Spatial Strategies which were used to allocate pitch provision to local authorities. The East of England Regional Spatial Strategy was repealed in January 2013. New planning guidance in relation to Gypsy and Traveller sites was published in March 2012 in the form of the CLG document 'Planning Policy for Traveller Sites' in March 2012.

## Planning Policy for Traveller Sites

- 1.13 The document 'Planning Policy for Traveller Sites' sets out the direction of government policy. Among other objectives the new policies aims in respect of Traveller sites are (Planning Policy for Traveller Sites Page 1-2) :

- that local planning authorities should make their own assessment of need for the purposes of planning;
- to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- to encourage local planning authorities to plan for sites over a reasonable timescale;
- that plan-making and decision-taking should protect Green Belt from inappropriate development;
- to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
- to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- to reduce tensions between settled and traveller communities in plan-making and planning decisions;
- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure;
- for local planning authorities to have due regard to the protection of local amenity and local environment.

- 1.14 In practice the document states that (Planning Policy for Traveller Sites Page 3):

*Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.*

Local planning authorities should, in producing their Local Plan:

- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
- identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
- protect local amenity and environment.

<sup>1.15</sup> A key element to the new policies is a continuation of previous government policies. This is that, while local authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites, if no need is identified they should set criteria based policies to assess potential sites which may arise in the future. Planning Policy for Traveller Sites notes on Page 3-4 that:

*Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.*

<sup>1.16</sup> Therefore, criteria based planning policies sit at the heart of the new guidance, irrespective of whether need is identified or not.

## Tackling Inequalities for Gypsy and Traveller Communities

<sup>1.17</sup> In April 2012 the government issued a further document relating to Gypsies and Travellers in the form of 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers' (CLG April 2012).

<sup>1.18</sup> This report contains 28 commitments to help improve the circumstances and outcomes for Gypsies and Travellers across a range of areas including (Page 6):

- Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children;
- Identifying ways to improve health outcomes for Gypsies and Travellers within the proposed new structures of the NHS;
- Encouraging appropriate site provision; building on £60m Traveller Pitch Funding and New Homes Bonus incentives;
- Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system;

- Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities and working with the financial services industry to improve access to financial products and services;
- Sharing good practice in engagement between Gypsies and Travellers and public service providers.

## Funding for New Sites

- <sup>1.19</sup> The Coalition Government policies also involve financial incentives for new affordable pitch provision in the form of the New Homes Bonus. For all new annual supply of Gypsy and Traveller and Travelling Showpeople pitches/plots on local authority or Registered Social Landlord owned and managed sites, local councils receive a New Homes Bonus equivalent to council tax (based on the national average for a Band A property), plus an additional £350 per annum for six years. This equates to around £8,000 pounds per pitch.
- <sup>1.01</sup> Direct grant funding is also available for Gypsy and Traveller sites. The Homes and Communities Agency (HCA) took over delivery of the Gypsy and Traveller Sites Grant programme from CLG in April 2009. Since then they have invested £16.3m in 26 schemes across the country to provide 88 new or additional pitches and 179 improved pitches. The HCA welcomes bids from local authorities, housing associations and traveller community groups working with Registered Providers.
- <sup>1.02</sup> The HCA has now confirmed allocations for all of its £60m of future funding which will support 96 projects around the country for the provision of new Gypsy and Traveller sites and new pitches on existing sites, as well as the improvement of existing pitches.
- <sup>1.03</sup> While all HCA funds for Gypsy and Traveller pitches have now been allocated, further funding may become available as a result of slippage over the course of the programme. Providers are advised to continue to work closely with HCA area teams to develop their proposals should any funding become available.

## Research Methodology

- <sup>1.20</sup> The research methodology for identifying the housing needs of Gypsies and Travellers adopted in this report was largely based upon face to face interviews with Gypsies and Travellers across the five Local authorities. We sought to undertake a census of Gypsy and Traveller households in the study area in August and September 2012. Interviews were attempted with every known Gypsy and Traveller household present across the local authorities during this time period and 108 interviews were achieved in total on-site, with a further 3 interviews in bricks and mortar. The Travelling Showpeople population of the study area is relatively low and they were predominantly away during the course of the study so only one interview was achieved, but their spokesperson was consulted.
- <sup>1.21</sup> This survey had a number of objectives. The primary objective was to ascertain the likely future household formation and travelling patterns in the study area and thereby determine the future need for extra site provision. However, the survey also aimed to analyse the provision of services on existing sites to assess if more, or improved, service provision was required within the existing sites.
- <sup>1.22</sup> The evidence from the household survey was then tied to other available sources of information such as planning and unauthorised encampment records.

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## 2. Gypsy and Traveller Sites and Population

### Sites in Suffolk (Study Area)

- 2.1 A mainstream Housing Needs Survey typically focuses upon the number of dwellings required in an area, and how many of these should each be provided by the public and private sector. The central aim of this study was to follow a similar format for Gypsy and Traveller accommodation requirements.
- 2.2 The main consideration of this study is the provision of pitches and sites for Gypsies and Travellers. A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans, but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies & Travellers. Throughout this study the main focus is upon how many extra pitches are required in the study area.
- 2.3 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of Gypsy and Traveller site is the publicly-provided residential site, which is provided by the local authority, or by a registered provider (usually a housing association). Places on public sites can be obtained through a waiting list, and the costs of running the sites are met from the rent paid by the licensees. Therefore, public sites are a direct equivalent of social housing among bricks and mortar tenants. There is currently one privately managed social accommodation site in Ipswich and one in Waveney.
- 2.4 The alternative to public owned social rented residential sites is private residential sites for Gypsies and Travellers. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households may be able to rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing.
- 2.5 The Gypsy and Traveller population also has other forms of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few weeks to a period of months. An alternative is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate Gypsies and Travellers whilst they travel.
- 2.6 Further considerations in the Gypsy & Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

## Caravan Count

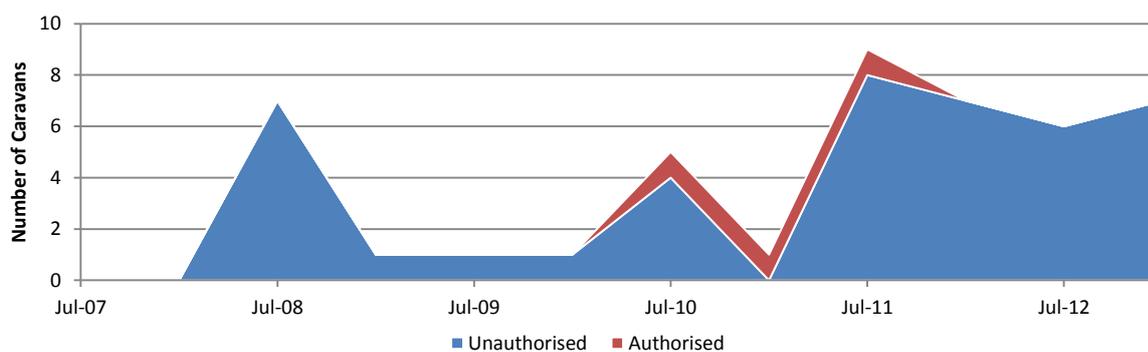
- 2.7 The best quantitative information available on the Gypsy and Traveller communities derives from a bi-annual survey of Gypsy and Traveller caravans which is conducted by each local authority in England on a specific date in January and July of each year. This count is of caravans (on both authorised and unauthorised sites) rather than households which makes it more difficult to interpret for a study such as this. It must also be remembered that the count is conducted by the local authority on a specific day and that any unauthorised encampments which occur on other dates will not be recorded. The count also only features those caravans the local authority is aware of. Therefore, it may not reflect all of the Gypsy and Traveller caravans in the authority.
- 2.8 The charts below show the cumulative number of unauthorised and authorised caravans in each local authority area at the time of the counts. Please note that the scale on each chart varies and that the charts are to be read cumulatively to give the total caravan count. They do not include any Showpeople caravans in the area. We would also note the figures are provided for illustrative purposes to demonstrate the relative size of the populations and are not used in any modelling of future pitch requirements.

### **Babergh District**

- 2.9 Figure 1 shows that during the most recent caravan count in January 2013 there were 7 caravans in Babergh District, all on unauthorised sites. Babergh District contains one pitch on a private site with permanent planning permission.

**Figure 1**

**Gypsy Caravan Count for Babergh District: July 2007 – Jan 2013 (Source: CLG Bi-annual Local Authority Caravan Count)**

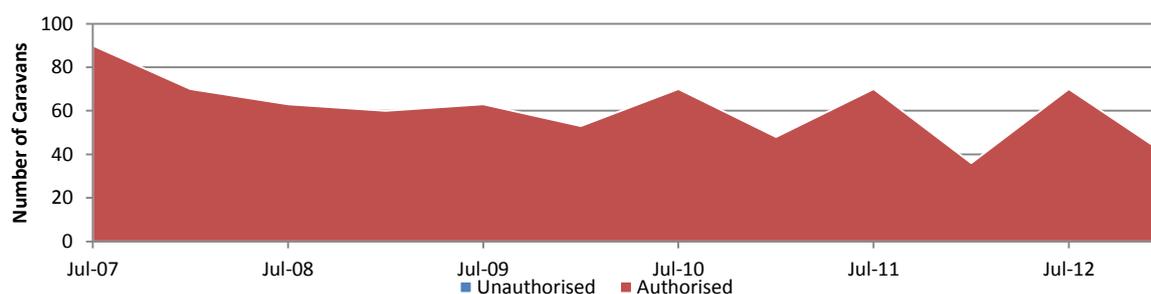


### Ipswich Borough

- 2.10 Figure 2 shows that Ipswich Borough has no recent records of caravans on unauthorised sites at the time of the caravan count. The borough contains one privately leased social accommodation site with a capacity of 41 pitches and one small private site of two pitches. The January 2013 count indicates a total of 40 caravans between these sites.

**Figure 2**

**Gypsy Caravan Count for Ipswich Borough: July 2007 – Jan 2013 (Source: CLG Bi-annual Local Authority Caravan Count)**



### Mid Suffolk District

- 2.11 Figure 3 shows a declining number of caravans on unauthorised developments in recent years. Mid Suffolk District contains 16 authorised private sites, (one of which has a 4 year temporary permission), with capacity to accommodate over 100 caravans, including one mixed use site which accommodates both Gypsies and Travellers and Travelling Showpeople, with capacity for 22 caravans.

**Figure 3**

**Gypsy Caravan Count for Mid Suffolk District: July 2007 – Jan 2013 (Source: CLG Bi-annual Local Authority Caravan Count)**

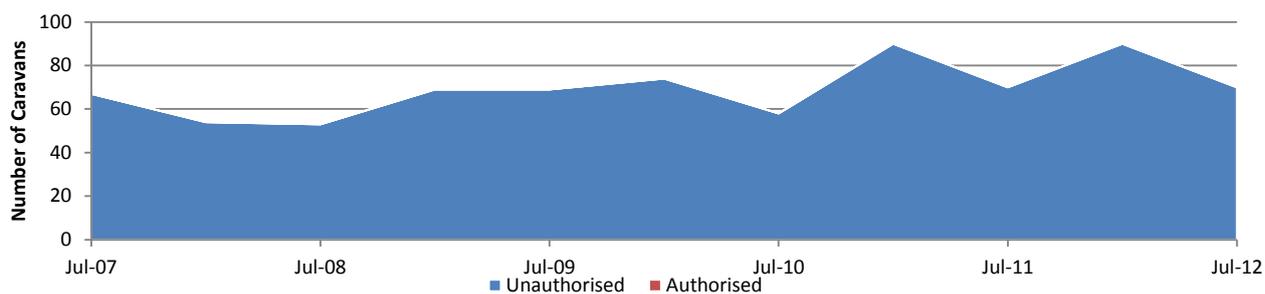


### **Suffolk Coastal District**

- 2.12 Suffolk Coastal District contains no authorised sites, but has in the past had a significant number of caravans on unauthorised encampments (peaking at 90 in January 2012). These sites were predominantly occupied by New Travellers. No count was conducted in January 2013 so the figures have not been reported.

**Figure 4**

**Gypsy Caravan Count for Suffolk Coastal District: July 2007 – July 2012 (Source: CLG Bi-annual Local Authority Caravan Count)**

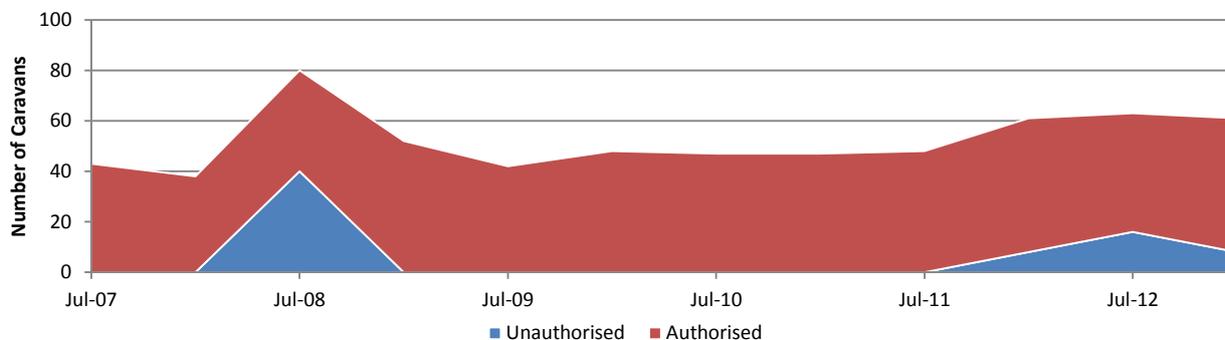


### **Waveney District**

- 2.13 Waveney District contains one authorised site of 24 pitches owned by the District Council, but privately managed. This site at Kessingland accounts for almost all of its Gypsy and Traveller population, though the counts reveal infrequent unauthorised encampments. At the latest count (January 2013), there were 53 caravans on the authorised site and 8 on unauthorised sites.

**Figure 5**

**Gypsy Caravan Count for Waveney District: July 2007 – Jan 2013 (Source: CLG Bi-annual Local Authority Caravan Count)**



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## 3. Stakeholder Consultation

### Introduction

- 3.1 In order to set the context of the research and ensure the study is based on a sound understanding of the relevant issues, ORS conducted 17 semi-structured, in-depth telephone interviews during September and October 2012. The interviews typically lasted between 15 and 40 minutes. The interviews were carried out with elected members, Gypsy, Traveller and Travelling Showpeople representatives, as well as officers representing a range of departments including Housing, Planning and Environmental Health in the following local authorities:
- Babergh District Council;
  - Ipswich Borough Council;
  - Mid Suffolk District Council;
  - Suffolk Coastal District Council;
  - Waveney District Council.
- 3.2 The aim of interviewing council officers, stakeholders and elected members was to provide background information on the framework within which they operate, and on the perceptions of the Gypsy and Traveller and Travelling Showpeople communities within each of the study areas. During the project ORS spoke to a representative at One Voice For Travellers and the Showmen’s Guild of Britain (Eastern Office). ORS also made three attempts to contact the Suffolk and Essex representative of the National Traveller Action Group but were unable to talk to the appropriate person.
- 3.3 The Gypsy Council were asked to take part in the study and it was explained that their views were important and would help the local authorities update their understanding of the accommodation needs of the Travelling Community and assist them in making decisions around the potential allocation of land to improve accommodation provision. Unfortunately, the Gypsy Council declined on the basis that they would not be reimbursed by ORS for their time.
- 3.4 This section attempts to highlight how matters relating to Gypsies and Travellers and Showpeople are currently handled and perceived across the areas. This section summarises the overall findings from each of the five areas. Different areas had a lot of common ground, but also diverged in considering unique issues relevant to their individual areas that are reported fully below. The needs of the Showperson’s community are reported separately.
- 3.5 Due to issues surrounding data protection and in order to protect the confidentiality of those who took part this section uses minimal verbatim comments and represents a summary of the views expressed by council officers, members and stakeholders in the area.

## Babergh District Council

### Policy Tools

- 3.6 Babergh District Council submitted their Core Strategy on 7<sup>th</sup> November 2012 and the examination took place on March 2013.

### Sites

- 3.7 There is a single pitch in Babergh which has been recently granted permanent permission.

### Unauthorised Encampments

- 3.8 There have been an increasing number of unauthorised encampments in the area – predominately by two families.

### Trends, Favoured Locations and Stopping Points

- 3.9 Historically, Gypsies and Travellers visited Babergh specifically to take up employment opportunities in fruit farms. This type of employment has since ceased and, as a result, so has the motivation for visiting the area.
- 3.10 Currently, it is believed that Gypsies and Travellers come to the area to visit relatives living in bricks and mortar.
- 3.11 There are considered to be favoured locations that are accessible to those travelling through the Babergh area, including:
- Chiltern airfield;
  - Raydon airfield; and
  - Newton Green.

### Community Relations

- 3.12 When unauthorised encampments occur it is generally agreed that they do result in community tensions. The main complaint made by the settled community is concerning waste and litter. As aforementioned, the District Council has endeavoured to tackle these issues as part of the Suffolk unauthorised encampment protocol. Antagonism also arises when Gypsies and Travellers use land well-used and enjoyed by the settled community, particularly on commons and green spaces.
- 3.13 Community tensions may arise when a planning application is put forward. This settles once planning permission is obtained.
- 3.14 Overall, interviewees were concerned that adverse media coverage preserved the negative perceptions held by some members of the settled community.

## Accommodation Needs

### Transit Provision

- 3.15 Officers and members agreed that the lack of transit provision made it difficult to manage the small number of unauthorised encampments that occur during the summer months. In order to meet accommodation needs and to reduce the effort and expense spent by the District there was considerable support for a transit site.
- 3.16 It was suggested that the Sudbury fringe would be a suitable location due to the history of intermittent unauthorised encampments in the area. One officer claimed that airfields would also be an ideal place considering the Gypsies and Travellers preference to use these areas. Based on past community opposition, however, there was concern that the public would react negatively to this.
- 3.17 Another option was along the A12 and A1071, which are the main travelling routes. Gypsies and Travellers could be signposted from the main routes. One officer suggested that it should not be constrained to geographical areas – but natural and logical stopping points and added that, as a result, it needs cross boundary support.

### Cross Boundary Issues

- 3.18 Officers were of the opinion that the most important cross border issue is the establishment of a transit site..

### The Future

- 3.19 When asked to consider the future situation the provision of a transit site was considered a priority, officers suggested that if transit provision were to be provided it would reduce community tensions.

## Ipswich Borough Council

### Policy Tools

- 3.20 Respondents referenced policies relating to the: National Planning Policy Framework; the Ipswich Housing Strategy; the Regional Spatial Strategy (RSS) and the Core Strategy which was adopted in 2011 – specifically CS 11, which deals with Gypsy and Traveller Accommodation.

### Accommodation: Sites and Unauthorised Encampments

- 3.21 Within the District there is one large social site (41 pitches) at West Meadows. Due to outsourcing, management of the site has recently transferred from Local Authority control and has become the responsibility of Homes Space Sustainable Accommodation.<sup>1</sup> The site is one of two publically owned but privately run sites in Suffolk and due to the limited public provision in Suffolk it is said to generate further demand shown to be rising in the Ipswich area although it may be serving demand stemming from the wider area.

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<sup>1</sup> <http://www.homespacesa.co.uk/Home.html>

- 3.22 There is also a private site in Ipswich with two pitches.
- 3.23 When asked to discuss the regularity of unauthorised encampments, interviewees felt that instances were fairly uncommon; only two encampments were reported in the District during the summer 2012 period. Unauthorised encampments are usually due to the same group being ‘moved on’; which has happened on more than one occasion.

### **Trends, Favoured Locations and Stopping Points**

- 3.24 It is not clear why the small numbers of Gypsies and Travellers travel through Ipswich. Employment opportunities are considered a possibility, as is the expansive nature of the area; the country park is considered a popular location.

### **Community Relations**

- 3.25 When unauthorised encampments occur it is generally agreed that they do raise community tensions. The main complaint made by the settled community is concerning waste and litter. As aforementioned, the Borough Council has endeavoured to tackle this issue as part of the Suffolk protocol for managing unauthorised encampments. Tensions may arise when Gypsies and Travellers use land well-used and enjoyed by the settled community.
- 3.26 It is reported that as soon as an encampment arises local residents will complain to the local press and Council. This reaction is thought to be due to negative perceptions that create fear amongst residents.

### **Accommodation Needs**

#### Permanent Provision

- 3.27 There was a mixed response from officers and members when asked to consider accommodation needs. A member was of the opinion that no evidence exists to support further permanent accommodation provision in the area.
- 3.28 An officer considered it was likely that more pitches were needed and reported that the commitment to providing a further five to six pitches is confirmed within the Housing Strategy 2011/12 -2015/2016.
- 3.29 It was argued that current accommodation needs are met through the large site. Expansion of this site may not be possible due to site constraints (the site is on the edge of the Borough so it adjoins a neighbouring Borough) and it is not desirable to manage anything larger. The preference is to have *smaller sites with 5-6 pitches rather than one large one*.

#### Transit Provision

- 3.30 The 2007 GTAA and the former RSS both evidenced the need for a transit site. The commitment to providing a transit site is currently outlined in the Housing Strategy 2011/12 -2015/2016.
- 3.31 It is believed that the provision of a transit site would be beneficial as there is little provision across the five authority areas and it will reduce the incidence of unauthorised encampments and their associated costs.

## Main Travelling Routes and Cross Boundary Issues

- 3.32 The RSS July 2009 suggested that the preferred location for a transit site is Ipswich/Felixstowe area. Working with neighbouring authorities is considered as key to achieving a transit site location within this area. It was explained that Ipswich has a *tight administrative boundary* and, given the requirement to be located on the A14 corridor, it was likely the transit site would be located in the neighbouring authority of Suffolk Coastal.

## Consultation Activities

- 3.33 A number of *current* consultation activities were reported:
- Current GTAA – the undertaking of 108 questionnaires with the Gypsy and Traveller community
  - Examination of the Core Strategy – representations received from the organisation Friends and Families of Travellers and Traveller Law Reform projects.
- 3.34 A *future* consultation activity was also highlighted:
- Site allocation – consultation with the Gypsy and Traveller community.

## The Future

- 3.35 The forthcoming GTAA results were viewed as key to informing future priorities.
- 3.36 It was reported the Council has committed through its Housing Strategy to provide a site for 5-6 permanent pitches and the Core Strategy policy commits to working with neighbouring authorities to deliver a transit site and additional permanent pitches which will be allocated through the Site Allocations DPD. There should be more equity in distribution of provision across the authorities and cross boundary working to ensure delivery of sites.
- 3.37 It was expected that, due to future growth, the provision of permanent pitches will need to increase. It is expected that this will be in line with the projected 3% growth concluded in the former RSS and similar to the 2007 GTAA.

## Mid Suffolk District Council

### Policy Tools

- 3.38 Officers referenced legislation relating to the Housing Act; the National Planning Policy framework; local planning and enforcement policy and the Core Strategy which was adopted in 2008 (CS10 deals with site criteria including size and location). Local policy is currently guided by the 2007 GTAA.
- 3.39 Importantly, officers discussed the importance and effectiveness of the Norfolk and Suffolk Gypsy and Traveller strategy. As a result of the combined strategy Mid Suffolk benefits from a consistent approach and excellent channels of communication.
- 3.40 The aforementioned strategy states that the districts and boroughs have a dual role of enforcement and welfare. It is the relevant councils ultimate decision as to whether the encampment will be tolerated or

evicted. The management of unauthorised encampments falls to the Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service

### **Accommodation: Sites and Unauthorised Encampments**

- 3.41 Mid Suffolk have the highest number of Gypsies and Travellers throughout Suffolk. Within the District there are 101 pitches, exclusively located in private sites which vary in size from a single pitch up to 19 pitches. The 2007 GTAA calculated that the area required an additional 42/43 pitches.
- 3.42 Thirty pitches have since been provided: one private site with approximately 18 pitches; an expansion of other smaller private sites; and provisions for a three pitched site. The efforts made by those who achieved these additional pitches were praised.
- 3.43 Across the District there are a number of authorised private sites which, reportedly, work well. They tend to be family/extended family sites which manage themselves. As a result, the Council have very little involvement in the management of the sites, unless for consultation purposes or for a specific reason such as the annual count.
- 3.44 It was agreed that, despite efforts, there are still unmet accommodation needs.
- 3.45 When asked to discuss the regularity of unauthorised encampments, the majority of Officers agreed that instances were fairly common.
- 3.46 Officers referenced a longstanding (12 months) encampment consisting of two caravans. The length of time it had been tolerated was reportedly unusual.
- 3.47 At the time of carrying out interviews there were two unauthorised encampments in Northern Mid Suffolk.

### **Trends, Favoured Locations and Stopping Points**

- 3.48 There are a number of key areas in the district where unauthorised encampments occur - mainly along the A140 and A143. Due to the rural border with South Norfolk there are also green sites/common land areas which are often targeted for those who are on vacation.

### **Community Relations**

- 3.49 When unauthorised encampments occur it is generally agreed that they do raise community tensions. The main complaint made by the settled community is concerning waste and litter. As aforementioned, the District Council has endeavoured to tackle this issue as part of the Suffolk and Norfolk strategy. Antagonism also arises when Gypsies and Travellers use land well-used and enjoyed by the settled community.
- 3.50 Community tensions tend to arise when a planning application is put forward. This settles once planning permission is obtained.
- 3.51 Overall, interviewees were concerned that adverse media coverage preserved the negative perceptions held by some members of the settled community.

## Accommodation Needs

### Transit Provision

- 3.52 Officers and members agreed that the lack of transit provision made it difficult to deal with the rise in unauthorised encampments during the summer months. In order to meet accommodation needs and to reduce the effort and expense spent by the District there was considerable support for a transit site.
- 3.53 The subject of size was considered and most officers felt five to ten pitches to be a sufficient number. In terms of management issues one officer thought a number of smaller sites as opposed to a single larger site would be easier to manage and alleviate any possible cultural friction that may arise in a larger, ethnically diverse site:
- 3.54 The relatively new issue of accompanying animals was thought to need some consideration. To ensure that those particular groups of travellers could be persuaded to use transit provision, some officers believed transit provision would need to contain grazing land. However, one officer pointed out that this approach may result in grazing land being used for other purposes (caravans).

### Permanent Provision

- 3.55 It was reported that more applications were coming through the planning system and it was felt that this was a positive way forward. However, affordable provision is thought to be required.

## Main Travelling Routes and Cross-Boundary Issues

- 3.56 Due to the proximity of the Norfolk-Suffolk border and the Essex-Suffolk border movement was thought to be historical. The most common routes are thought to be the A140 and the A143.
- 3.57 When considering cross boundary issues, most officers reflected positively upon the Suffolk strategy and the emerging joint Norfolk and Suffolk strategy and felt this to be invaluable when exploring the future location of a transit site.

## Consultation Activities

- 3.58 A number of consultation activities were reported:
- Gypsy and Traveller Steering Group - meetings are attended by one member of the Gypsy and Traveller community;
  - Members' workshops – encouraging cultural awareness;
  - Health and Well-being – on-site visits to consult with the community;
  - Caravan Count – twice yearly.

## The Future

- 3.59 When considering future needs interviewees highlighted the importance of the forthcoming GTAA. The local authorities will continue to work together through the Gypsy and Traveller Steering group to address the needs of the areas and seek opportunities for suitable permanent and transit site provision.

- 3.60 It was the opinion of officers and members that the failure to acquire transit provision will undoubtedly lead to problems during the summer months.
- 3.61 Permanent provision is also said to be required. Some officers were mindful of the constraints including landscape designation concerns.

## Suffolk Coastal District Council

### Policy Tools

- 3.62 Officers referenced the “saved” policies Suffolk Coastal Local Plan (1<sup>st</sup> and 2<sup>nd</sup> Alterations) and the emerging (adopted July 2013) Core Strategy and Development management strategy, which proposes an alternative local strategy to that set out in national policy Planning Policy for Traveller Sites 2012.
- 3.63 Officers discussed the importance and effectiveness of the emerging Norfolk and Suffolk Gypsy and Traveller strategy.

### Accommodation: Sites and Unauthorised Encampments

- 3.64 Within the District there are three unauthorised New Traveller encampments located in the forest at Rendlesham. Although some have been present for over 25 years, no permanent provision has been established. The three sites are on land owned by the Forestry commission, Ministry of Defence land and a private landowner and are all within 2 miles of each other.
- 3.65 An encampment at Felixstowe which lasts about a week is an annual occurrence.

### Trends, Favoured Locations and Stopping Points

- 3.66 Overall, due to the longstanding New Traveller settlement, it is more likely that this type of travellers will visit the area. It is the view of a member that the numbers of New Travellers may be increasing.

### Community Relations

- 3.67 All sites are in the forested area and it is reported that the attitude of those residing at the sites is that they simply want to be left alone. These are sites which have been used on a regular basis which have been tolerated by landowners because they are not causing any problems and because *they do not want anyone else using the land*.
- 3.68 It is the case, however, that although in the main the sites are stable, there have been community issues in the past. Interviewees noted that raves occurred in 2010 and 2011 and this led to community tensions.
- 3.69 These activities were allegedly perpetrated by people coming onto the site as opposed to the individuals normally there and the issue has since been resolved through police involvement.

## Accommodation Needs

### Permanent Provision

- 3.70 The Council acknowledges the identified need for pitches for Gypsies as identified in the 2007 GTAA. However, the Council has had only limited contact with this group and the affected landowners since then. Since November 2012 the Council is committed to undertaking a single issue Site Specific Allocations document to progress matters.
- 3.71 New Travellers were considered to be the main focus. There was a difference in opinion to what extent the unauthorised encampments should or could be formalised. One view put forward was that the District should not interfere with the informal accommodation arrangement that currently exists.
- 3.72 Although it was acknowledged that those at the sites could be resistant, it was argued that, in the longer-term, it would be beneficial to secure formal arrangements and *they might be happy to formalise it and buy the land so they won't be moved on.*

### Transit Provision

- 3.73 The 2007 GTAA identified the need for transit provision somewhere between Ipswich and Felixstowe. It remains the case that this is considered to be an appropriate area. Both Suffolk Coastal and Ipswich Borough Councils are committed to its provision.

## Consultation activities

- 3.74 Following the 2007 GTAA informal discussions have commenced with the Traveller groups, and landowners with regard to what future pitch provision should comprise. The Council has also committed to a single issue development plan document which will allocate land for Traveller site provision.
- 3.75 The annual caravan count was highlighted.

## The Future

- 3.76 The forthcoming GTAA results were viewed as key to informing future priorities.

## Waveney District Council

### Policy tools

- 3.77 Officers discussed the importance and effectiveness of the emerging Norfolk and Suffolk Gypsy and Traveller strategy. As a result of the combined strategy Waveney benefits from a consistent approach and excellent channels of communication.

### Accommodation: sites and unauthorised encampments

- 3.78 Within the District there is one site at Kessingland which accommodates 24 pitches. Currently, the site is owned by Waveney District Council.

- 3.79 At the time of interview, a funding application had been made to increase the size of the site by four permanent pitches and two transit pitches. An officer felt the four pitches would meet an increased need for the next four/five years.
- 3.80 When asked to discuss the regularity of unauthorised encampments, the majority of officers agreed that instances were fairly uncommon and the *area doesn't get too many*.
- 3.81 Through discussions, it emerged that there had been an encampment at Beccles towards the end of the summer period. This was a small group who were reportedly not causing any problems.
- 3.82 A number of Gypsies and Travellers currently live in bricks and mortar in the area. There is also thought to be some interest shown in living in bricks and mortar, particularly amongst the older population who possibly want to take advantage of the benefits of living in sheltered accommodation.

### **Trends, Favoured Locations and Stopping Points**

- 3.83 In general, the majority of unauthorised encampments are said to be seasonal and occur during the summer months generally close to the river and costal locations.

### **Community Relations**

- 3.84 The site at Kessingland is said to be fully integrated with the settled community and there are no community tensions reported. However, when an unauthorised encampment does occur this generally causes concern.

### **Accommodation Needs**

#### Transit Provision

- 3.85 With regard to the future management of unauthorised encampments throughout the county, the provision of transit accommodation was viewed as a positive step forward: The transit would contribute to the county priority of having some provision as there is none at the moment. This would be an important step for the whole area.

#### Permanent Provision

- 3.86 When asked to consider further accommodation needs it was felt that increasing the site by four pitches would meet any further accommodation needs for the next five years.

### **Main travelling routes and cross boundary issues**

- 3.87 It was reported that there are no historic routes Gypsies and Travellers follow which leads them into Waveney. The main route Gypsies and Travellers take is down the Waveney valley but on the other side of the river through Mid Suffolk and Norfolk.

- 3.88 Officers praised the Norfolk- Suffolk relationship and, in particular, the officers involved.

### Consultation activities

- 3.89 Regular consultation will be developed now that ownership of the site has transferred to Waveney (having previously been owned by Suffolk County Council). It is intended that staff will visit the site three or four times per year.

### The Future

- 3.90 It is believed that the expansion of the site from 24 to 28 pitches at Kessingland would meet the needs of the community for the subsequent five years. However, it is predicted that in five years' time it may be the case that the District will need to look at something new and a different area.

### Showpeople

- 3.91 Through the discussions with Officers and Members from each of the areas, it was reported that there are no Travelling Showpeople in Waveney. There had been a private show person's site at Ipswich but that is no longer in use. It was noted in Babergh that they do travel into the area but there are no issues as a result. There is a site at 'Leiston' in Suffolk Coastal which has existed for over 20 years. It is felt that any additional need from this group would derive from the current sites, as opposed to any incomers. There is considered to be sufficient space within the site to accommodate any increase and, if a new site is requested, there are planning policies in place to deal with this.
- 3.92 However, through discussion with the Showmen's Guild reported that there are a number of Showmen currently looking for new sites in the study area. However, an officer reported that there are no current applications and a need for Travelling Showpeople sites was not identified through consultation on the Core Strategy.
- 3.93 It is argued that due to treating Showpeople and Gypsies and Travellers together, planning policy (i.e. the NPPF) fails to distinguish between the identities of the different groups. This has compromised the ability of Showpeople to gain planning permission.
- 3.94 Accessible travel is a priority when considering site allocation – roads links and the practicalities relating to the use of HGVs are the main priorities and the extent to which it could be or tolerated particularly in small rural communities. When developing a site Showpeople require little input from the local authority as they are prepared to develop the site and put in water, electricity and roads.
- 3.95 Suffolk is believed to be an ideal location for Showpeople as they are within the reach of fairs in the Cambridge area including the Fens and Kings Lynn.

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## 4. Gypsy and Traveller Population

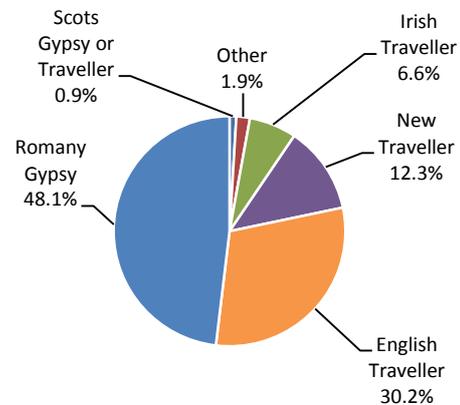
### Survey of the Gypsy and Traveller Population

- 4.1 One of the major components of this assessment was a detailed survey of the Gypsy and Traveller population in Suffolk the study area. This aimed to identify current households with housing needs, and to assess likely future household formation from within the existing households to help judge the need for future site provision. The survey sought to provide a baseline position on the resident Gypsy and Traveller population of the study area.
- 4.2 Interviews were attempted with every Gypsy and Traveller household in the area who were present between August and September 2012. Therefore, the baseline point for the findings of this study is September 2012. Throughout the survey period interviewers worked from 9am to 7pm each day and made repeated visits to each household until a successful interview was concluded. In total, interviews were achieved on-site with 108 households and a further 3 in bricks and mortar. In total there are around 170 occupied pitches in the study area, so this represents around a 64% response rate.
- 4.3 For the on-site interviews, the following number took place on each local authority:
- Babergh – 5 interviews;
  - Ipswich - 38 interviews;
  - Mid Suffolk – 32 interviews;
  - Suffolk Coastal – 16 interviews;
  - Waveney – 17 interviews.
- 4.4 Throughout this study the person responding to the survey will be referred to as the respondent, and in questions which refer to all people in the household they will be referred to as household members. Throughout the remainder of this report the majority of numbers which appear on the charts represent the percentage of respondents who appear in that category. The purpose of showing percentages is to allow the results of the survey to be extrapolated to the whole Gypsy and Traveller population of Suffolk. In a few cases it is more appropriate to use the actual number of respondents, and these cases are clearly identified. In all charts those respondents who answered ‘don’t know’, or did not answer the question, are omitted unless otherwise stated.

## Ethnic Background

- 4.5 Over half of all respondents explicitly identified themselves as being Romany Gypsies and three-in-ten as English Travellers which tends to be an alternative name for Romany Gypsy. 12% of the respondents reported that they were New Travellers, with most of these living in Suffolk Coastal.

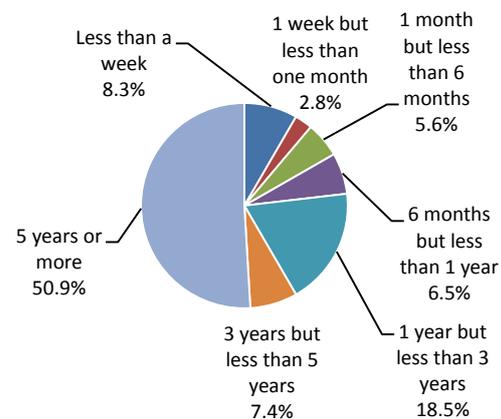
Figure 6  
Ethnic Group by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2012)



## Length of Residence

- 4.6 Many Gypsies and Travellers surveyed had a long period of residence in Suffolk. 51% of respondents had lived on their current site for more than 5 years. 84% of respondents identified their current site as being their permanent base.

Figure 7  
Length of Time Respondents Have Lived on Their Current Site, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2012)

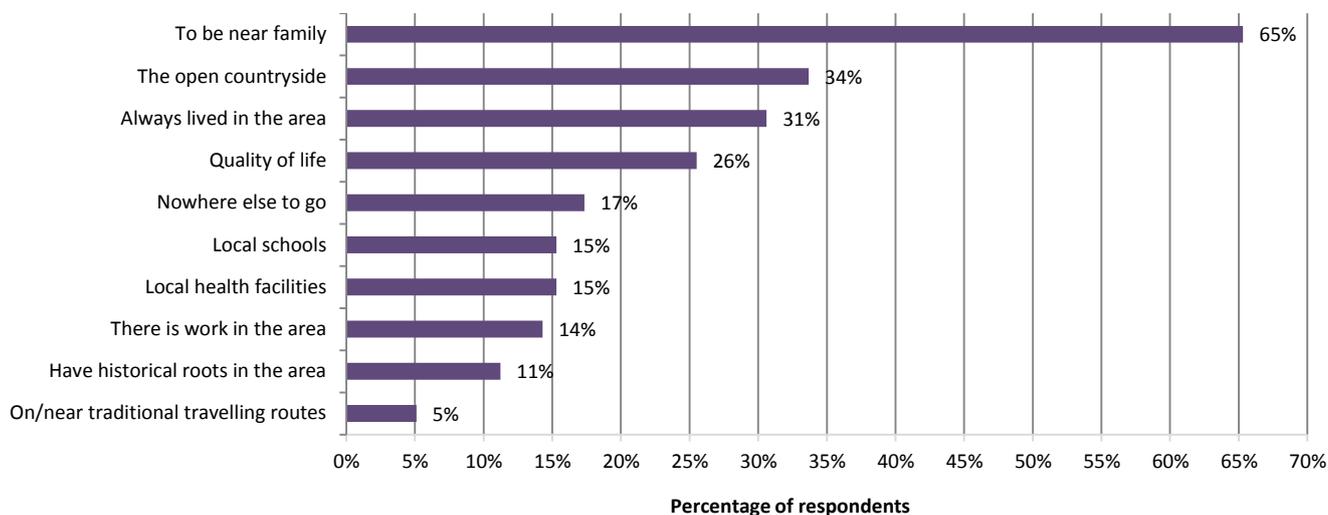


## Attractions of Living in Suffolk

- 4.7 Respondents were asked to identify the main reasons that attracted them to live in Suffolk. They were allowed to select as many reasons as they wished from a list of nine options.
- 4.8 The main factors which attracted respondents to Suffolk were to be near to their family or because of the open countryside. 17% of respondents reported that they were attracted to Suffolk because they had nowhere else to go. This is a common response in surveys undertaken by ORS and reflects that a number of Gypsies and Travellers often move to an area because there is available space there rather than because they have a positive reason to live there.

Figure 8

What Attracted Them to Live in the Area, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2012)

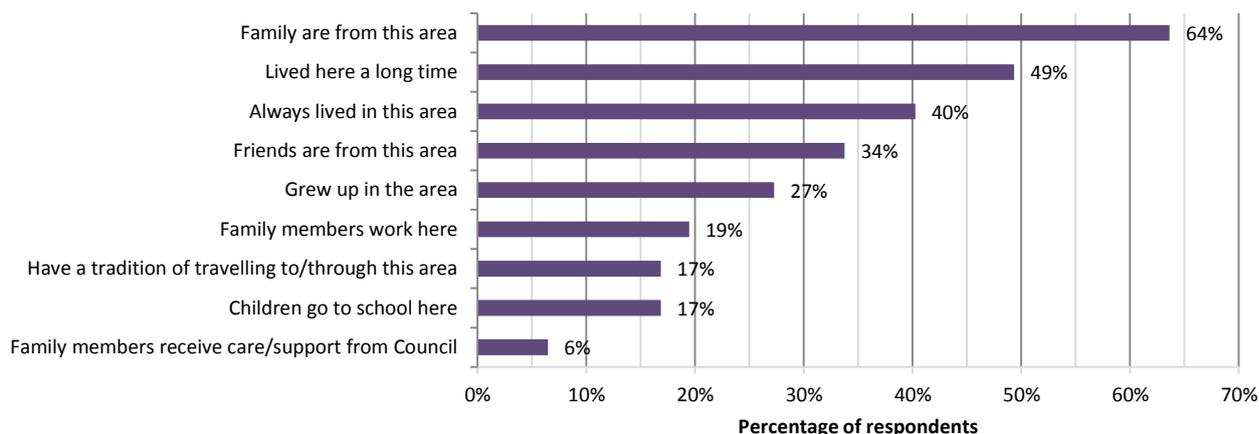


## Connections with the Area

- 4.9 Over seven-in-ten respondents felt they have strong connections to Suffolk (72%). In particular the main connection that Gypsy and Traveller households felt to the area was that their family were from the area; while many had either lived in Suffolk for a long time or had always lived in the area.

Figure 9

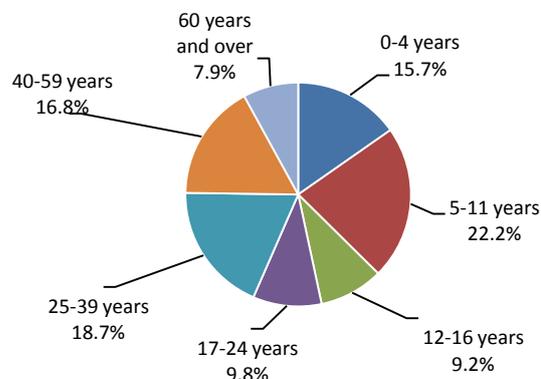
Nature of Local Connections in Suffolk, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2012)



## Age and Household Profile

- 4.10 The households showed a mixed range of ages across their members. The households contained 8% of people who were over 60, but over 47% of all household members were aged 16 years or under. 31.4% of all household members were of school age and another 15.7% were children aged 4 years or less.
- 4.11 However, we would note that the age profile of New Travellers is different to that of Gypsies and Travellers with both far fewer children and older persons amongst New Travellers.

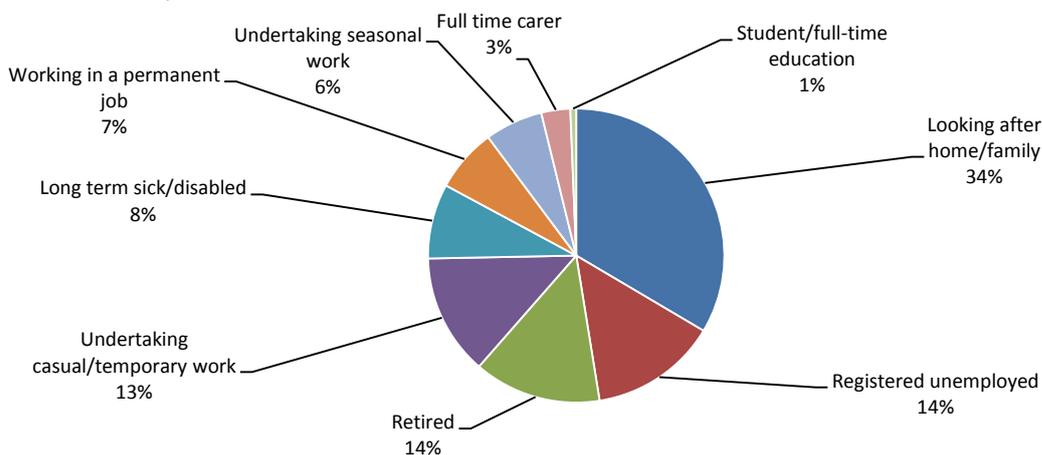
Figure 10  
Age of Household Members, by all Household Members  
(Source: Survey of Gypsy and Traveller Population On-site 2012)



## Employment Status

- 4.12 Respondents were asked to report the employment status of all household members aged 16 or over. Of those who had their employment status recorded, 34% were looking after their home/family, 14% were retired and 14% registered unemployed. 7% had a permanent job, while another 13% had casual/temporary work. Many of those employed worked as gardeners or tree surgeons, labourers, car mechanics and builders.

Figure 11  
Employment Status of Household Members, by All Household Members Aged Over 16 Years (Source: Survey of Gypsy and Traveller Population On-site 2012)



## Health Problems

- 4.13 30% of respondents interviewed reported that their household contained at least one member with a long-term health problem. However only three respondents reported that adaptations were required in their home to meet the needs of the household members currently suffering with health problems. Amongst adaptations required were handrails, non-slip mats for a disabled access ramp and a shower adapted for the disabled.

## 5. Existing Sites

### Type of Site

- 5.1 83 of the on-site interviews were completed on authorised sites (30 on private sites and 53 on public sites). 25 interviews were conducted on unauthorised developments or encampments. The interviews on public sites included those in Waveney on a local authority owned site which is privately leased.

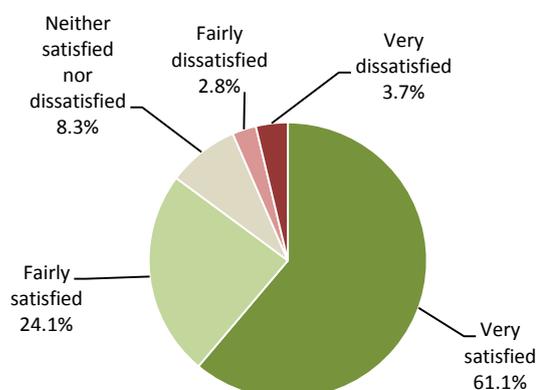
### Type and Number of Caravans

- 5.2 All respondents were asked if they require extra caravans. The evidence from the survey is that only four households would like more caravans within their existing household. All had space at their existing pitch to accommodate these caravans.
- 5.3 The phrasing of this question focused on a need rather than a demand for more caravans. Respondents were asked, irrespective of who was purchasing the caravans, whether they needed more caravans for household members. Therefore, this question simply reflected a perceived need for more caravans, rather than an ability to afford (demand for) more caravans.
- 5.4 Five households reported that there were people living elsewhere who they would like to have living with them. This group predominantly wanted adult children to be living with them. These additional persons live outside of Suffolk. Therefore, if anyone was to join existing households it would not free any extra pitch provision in Suffolk.

### Views of Sites

- 5.5 The majority of respondents were satisfied with their sites (see Figure 12). 85% of respondents expressed satisfaction with their site, with 61% stating they were very satisfied. Only 7% expressed dissatisfaction..
- 5.6 Figure 13 overleaf shows the improvements which were identified by respondents as being required at their permanent sites. The majority of households are satisfied with their sites and a reflection of this is that 70% of respondents felt that no improvements were required on the site.

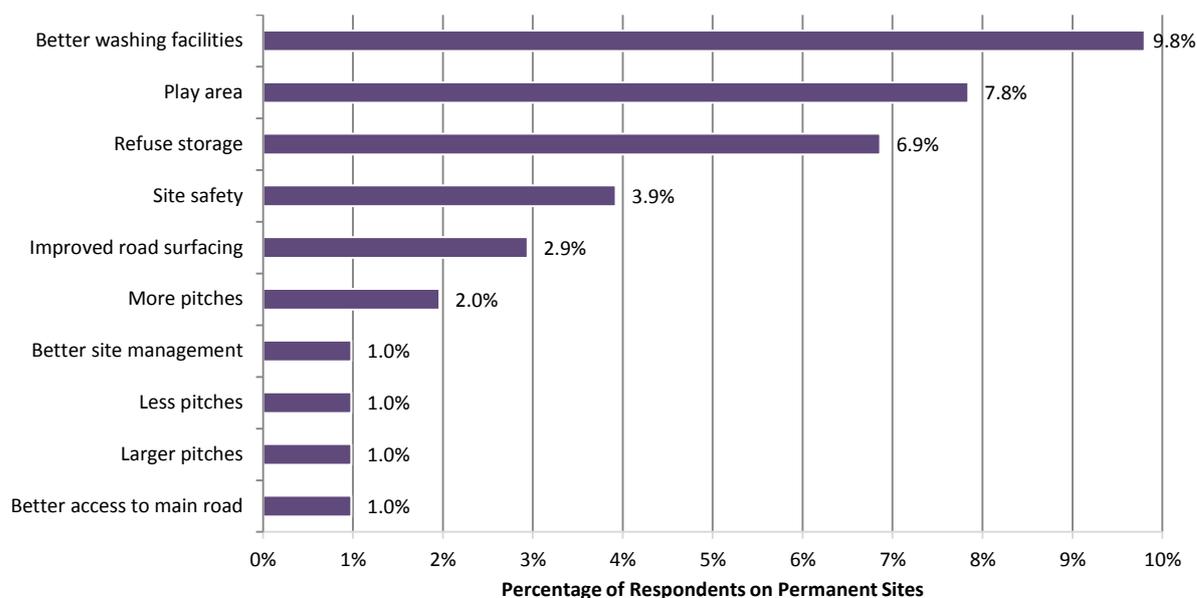
Figure 12  
Satisfaction with Current Site, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2012)



- 5.7 Of the respondents who did cite improvements, around one-in-ten wanted better washing facilities such as showers. Very few respondents reported that they wanted better access to the main road, larger pitches, less pitches and better site management.

Figure 13

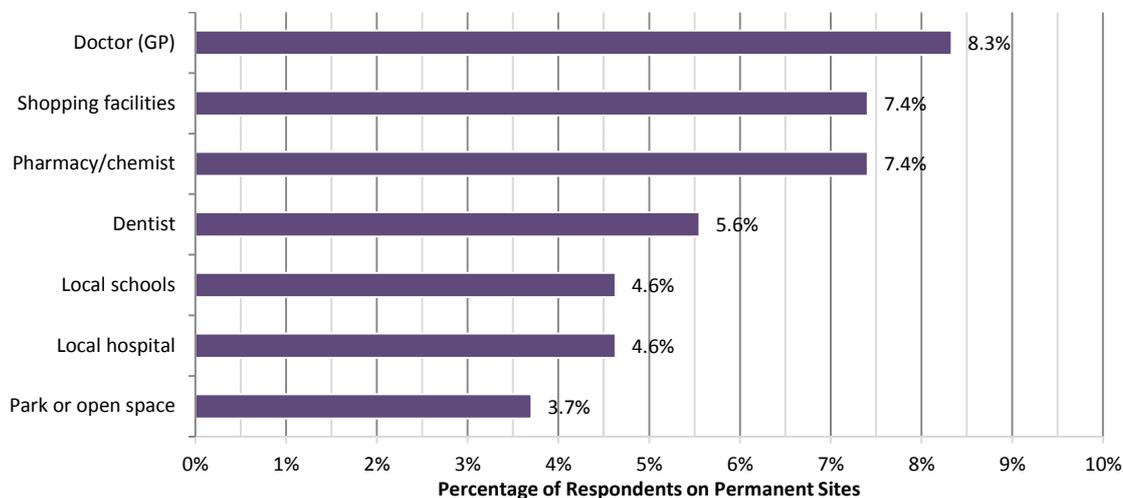
Improvements Respondents Would Like to See on Their Site, by all Respondents on Permanent Sites (Source: Survey of Gypsy and Traveller Population On-site 2012)



- 5.8 When asked what services they needed that they had difficulties accessing, the highest proportion of respondents cited GPs (8%), shopping facilities (7%) and pharmacy/chemist (7%) as being the hardest services to access. The same respondents reported a lack of access to a range of services, with many living on an authorised site at Elmswell in Mid Suffolk and on a New Traveller encampment in Suffolk Coastal reporting problems. For the Elmswell site, text comments indicate a lack of a pathway from the site to the adjacent village is a problem. For the New Travellers it can be difficult to register for services when lacking a permanent address. However, other households on the same site did not report any problems, with all of the households identifying problems citing a lack of public transport as being an issue..

Figure 14

Services needed by respondents or their families that they have had difficulty accessing, by all Respondents on Permanent Sites  
(Source: Survey of Gypsy and Traveller Population On-site 2012)



5.9 Over three quarters of respondents feel that their current accommodation and site meets all of their needs in terms of accommodation quality, space and site facilities (see Figure 15). However, 16 respondents stated that their current site did not meet their accommodation needs.

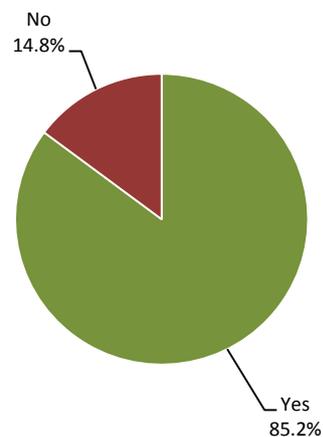
5.10 The main reasons given by those who feel that their current accommodation and site do not meet their needs said that this was because their accommodation was lacking facilities, there was not a play area for children, the site was in a poor state of repair and that the site was not safe enough.

5.11 Of the respondents who felt that their current accommodation and site did not meet their needs, half said that their needs could be addressed at their current pitch while six households said that they would have to move to another site in order to meet their needs.

5.12 8 respondents said that within the next two years, certain members of their household would want to leave permanently and live elsewhere. However, this included a number on unauthorised sites, so does not just represent formations from within existing sites. .

Figure 15

Whether current accommodation and site meet all of respondents' needs (Source: Survey of Gypsy and Traveller Population On-site 2012)



## Private Sites

- 5.13 11 respondents to the survey reported that they had applied for planning permission for their site. Of these, 2 respondents felt that it was easy, while 7 found it difficult. The remaining 2 respondents found it neither easy nor difficult. The main difficulties reported were objections from local people placing pressure on the local council. However, a number of respondents now report that their relationship with the local community is very good despite the initial objections.

## Propensity to Travel

- 5.14 69% of respondents reported that they had not travelled at all during the last 12 months but 40% of those who did not travel in the past 12 months had travelled in the past. The most common reasons households gave for not travelling was due to ill health of some family members and that they want a more settled lifestyle. Of those who want a more settled lifestyle, most are on the sites in Ipswich and Waveney and were either of retirement age or had younger children in the household.

## 6. Future Site Provision

### Site Provision

- 6.1 This section focuses on the extra site provision which is required in the study area currently and over the next 15 years by 5 year segments. This time period allows for robust forecasts of the requirements for extra provision based upon the evidence contained within this survey and also secondary data sources.
- 6.2 We would note that this section is based upon a combination of the on-site survey and planning records. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records.
- 6.3 This section concentrates not only upon the total extra provision that is required in the area, including whether this provision should be in the form of public or private sites, but also whether there is a need for any transit site / emergency stopping place provision.
- 6.4 We have not considered provision made in the period prior to 2012 or and are taking 2012 as a baseline position for our estimates. However, any backlog of unmet need will have been captured within figures for current need. In this case the backlog of need refers to households who need to have their own accommodation. This includes concealed households, those on unauthorised sites who do not wish to move, those in bricks and mortar seeking to move to sites and other households on the waiting list.
- 6.5 The location for future provision is a key issue within studies such as this one. The estimates for local authorities within this study are based upon the location where needs will arise. **This is not necessarily the same location as where need could be met.** Gypsies, Travellers and Travelling Showpeople are not constrained by local authority boundaries and potentially the requirement for one local authority could be met in a neighbouring area. However, for this to occur will require cooperation from all planning authorities concerned.
- 6.6 The March 2012 CLG document 'Planning Policy for Traveller Sites', requires an assessment for future pitch requirements, but does not provide a suggested methodology for undertaking this calculation. However the key factor in any calculation such as this is to compare the amount of extra site space which will become available with a prediction of the need for extra space on sites. We will firstly outline this calculation for Gypsies and Travellers before discussing Travelling Showpeople.

### Supply of pitches

- 6.7 Pitches which are available for use can come from a variety of sources. These include
- » Currently vacant pitches;
  - » Any pitches currently programmed to be developed within the study period;
  - » Pitches vacated by people moving to housing;
  - » Pitches vacated by people moving out of the study area

- » Pitches vacated due to the dissolution of households (normally through the death of a single person household).

### Current Need

- 6.8 There are four key components of current need. Total current need is simply:
- » Households on unauthorised developments for which planning permission is not expected;
  - » Concealed households;
  - » Households in bricks and mortar wishing to move to sites; and
  - » Households on waiting lists for public sites.

### Future Need

- 6.9 There are three key components of future need. Total future need is simply the sum of the following:
- » Households living on sites with temporary planning permissions;
  - » New household formation expected during the study period; and
  - » Migration to sites from outside the study area.
- 6.10 We will firstly provide the model as set out above for Gypsies and Travellers before repeating the calculation for Travelling Showpeople.

## Current Gypsy and Traveller Site Provision

- 6.11 There are currently 65 pitches on public sites and approximately 104 occupied private sites including those with temporary permission, and unauthorised developments in the study area.
- 6.12 The next stage of the process is to assess how much space is, or will become available on existing sites. The main ways of finding this is through:
- » Current empty pitches;
  - » New sites or site extensions which are likely to gain planning permission;
  - » Migration away from the area;
  - » Movement to bricks and mortar;
  - » Dissolution of households.
- 6.13 Currently, all authorised public site pitches are occupied in Suffolk, so there is no available space. For private sites, most are for one family and have no available space on them.
- 6.14 For out-migration to other areas or movements to bricks and mortar, households will also wish to move in the opposite direction. Therefore, we have treated these as being part of the current and future need sections of the calculation rather than seeking to separate the supply from out-migration from the need due to in-migration.

- 6.15 The dissolution of a household occurs when all the members leave the household. Common ways for a household to dissolve are for a person living on their own to die, or to move to another existing household. Given that households will also form in the future we have treated the net growth generated by existing households as being part of the future need.

### Additional Site Provision: Current Need

- 6.16 The next stage of the process is to assess how many households are currently seeking pitches in the study area. Groups of people who are likely to be seeking pitches will include those:
- » Households on unauthorised developments for which planning permission is not expected;
  - » Concealed households;
  - » Households in bricks and mortar wishing to move to sites; and
  - » Households on waiting lists for public sites.

### Current Unauthorised Developments and Encampments

- 6.17 As noted earlier, 25 of the 108 on-site interviews occurred on unauthorised developments or encampments. Of these, 5 were at one site in Babergh, 4 were at one site in Mid Suffolk, with the remainder being in Suffolk Coastal with predominantly New Travellers.
- 6.18 Two of the households on the unauthorised sites in Babergh wished to move into bricks and mortar and one wished to move to a public site outside of the area. This leaves two who wish to develop a private site in the area.
- 6.19 All of the interviewees at the unauthorised site in Mid Suffolk reported that it was not their home base and none was seeking a permanent site in Suffolk.
- 6.20 Of the 16 interviewees in Suffolk Coastal on unauthorised sites, almost all see their current sites as their home base. However, 5 are interested in moving into suitable housing in the area if it was available. This still leaves at least 11 New Traveller households who wish to remain at their current site, which in turn does not have planning permission. However, we would note that in practice there are more New Traveller households in Suffolk Coastal, with some not wishing to take part in the survey but who are known to want to stay in the area. Therefore, rather than count 11 households from the household survey we have allowed for 25 New Traveller households who wish to remain on site. This does not represent all households on the site, but does represent those who would wish to live permanently on the site.

### Concealed Households

- 6.21 The site visits from ORS interviewers identified no evidence on any concealed households. Most sites were reported as being at or near capacity, but there was no evidence of concealed households on private or public sites leading to overcrowded pitches.

## Bricks and Mortar

- 6.22 Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. Meanwhile, the 2011 UK Census of Population identified a population of 496 Gypsy and Traveller persons across the five local authorities. Given that there are nearly 150 occupied Gypsy and Traveller pitches on site in the area, the vast majority of the population are likely to be living on sites. The figure of 496 persons is likely to be an under-estimate of the total population due to some Gypsies and Travellers not declaring their ethnic status or completing the Census at all, but it does still indicate a relatively low population in bricks and mortar.
- 6.23 As noted earlier, ORS worked with stakeholders, the local authorities and on-site interviewees to identify households in bricks and mortar and this process yielded three interviews, none of who wished to move on to sites. While some stakeholders felt that there were many households in bricks and mortar, ORS do not consider that it is appropriate to include an estimate of the numbers who wish to move to housing without clear evidence of their existence.
- 6.24 We would also note that for a number of recent studies undertaken by ORS we have worked with national Gypsy and Traveller representatives to identify households in bricks and mortar. For a number of recent studies the representatives reported over 100 known households in housing and they encouraged them to come forward to take part in the survey. The actual number who eventually took part in the surveys ranged from zero to six households per area, and not all wished to move back to sites. Therefore, while there is anecdotal evidence of many Gypsies and Travellers in housing most appear to be content to remain there and when provided with the opportunity by national representatives to register an interest in returning to sites few choose to do so.
- 6.25 It is also the case that within most face to face surveys undertaken on-site by ORS a small number of households are seeking to move to bricks and mortar. In the case of this study, two households wished to move into bricks and mortar housing within the study area and have been counted as doing so within the model (one household in Mid Suffolk and one in Waveney).

## Waiting Lists for Public Sites

- 6.26 The normal method of registering a desire to obtain a pitch on a public site is through placing your name on the waiting list held by the county or district council. However, the site in Ipswich is now managed on a 25 year lease by Home Space Sustainable Accommodation, who are a private registered provider. There is no formal waiting list for pitches in Suffolk despite sites such as those in Ipswich and Waveney being public owned, but privately managed. Issues around movement to and from private sites have been addressed in the section relating to migration.

## Additional Site Provision: Future Need

- 6.27 The next stage of the process is to assess how many households are likely to be seeking pitches in the area in the future. Groups of people who are likely to be seeking pitches will include those:
- » Households living on sites with temporary planning permissions;
  - » New household formation expected during the study period; and
  - » Migration to sites from outside the study area.

## Temporary Planning Permissions

- 6.28 Suffolk currently has two sites with temporary planning permissions, one each in Mid Suffolk and Babergh, each containing one household. In both cases the permissions will expire inside of the next 5 years, so they have been counted as need within this assessment, but not as supply of pitches.

## New Household Formation

- 6.29 It is recognised that an important group for future pitch provision will be older children who form their own households. The age profile of the population indicates that the population of Suffolk is very young with nearly a third falling into the 5-16 years age range. This means that many are likely to form new households in the next 15 years. Many studies of Gypsy and Traveller populations assume a net growth (formation minus dissolutions) in the population of around 3% per annum, and this figure was used in the East of England Regional plan. However, long-term trends indicate that the number of Gypsy and Traveller caravans on site has grown by 134% nationally in the past 34 years, which equates to a net growth of around 2.5% per annum. Unfortunately no figures are available for Gypsy and Traveller households. However, UK Census of Population 2011 and ORS own national survey data both indicate the population of Gypsies and Travellers doubles approximately every 40-50 years, giving an annual growth of around 1.25%-1.75% per annum. Evidence for this is covered in a technical appendix available on request.
- 6.30 While previous studies have used a net growth figure of 3%, ORS firmly believe that any evidence base, including the present study should use the most accurate information available, rather than simply relying on precedent. Practice Guidance notes on Page 25, footnote 6 that:

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

- 6.31 Therefore, we have used 2.5% growth per annum for this study. When including the impact of compound growth, a 2.5% growth per annum provides for 13% growth over 5 years, 28% growth over 10 years and 45% growth over 15 years.
- 6.32 On the basis that there are approximately 150 families on Gypsy and Traveller sites, excluding New Travellers, in the study area this is likely to equate to around 68 more households on-site in the next 15 years.
- 6.33 For New Travellers, there are fewer children on site. Therefore, from the 25 existing households on site we have allowed for a much lower rate of formation. Based upon the household survey estimates it can be anticipated that the household formation from New Traveller households in Suffolk Coastal will be 6 households. This gives a total household formation across all groups of 74 households.

## In-migration from Other Sources

- 6.34 The most complicated area for a survey such as this is to estimate how many households will require accommodation from outside the area. Potentially Gypsies and Travellers could move to Suffolk from anywhere in the country. The number of households seeking to move to Suffolk is likely to be heavily dependent upon pitch provision elsewhere. It has been noted that a weakness of many Gypsy and

Traveller Accommodation Assessments conducted across the country has been that they either allowed for out-migration without in-migration which led to under-counting of need, or they over-counted need by assuming every household visiting the area required a pitch.

- 6.35 Overall the level of in-migration to Suffolk is a very difficult issue to predict. Evidence from the household survey is that up to three households per annum will seek to leave the area. However, it must be remembered that households will move in the opposite direction. We have therefore allowed for a balanced level of migration on to existing sites. The advantage of allowing for net migration to sum to zero is that it avoids the problems seen with other Gypsy and Traveller Accommodation Assessments where the modelling of migration clearly identified too low or high a level of total pitch provision. An assumption of net nil migration implies that the net pitch requirement is driven by locally identifiable need (see “net migration to the area” in figures

- 6.36 **Figure 16** (Figure 17, Figure 18, Figure 19, Figure 20, Figure 21 below). This approach has been used and accepted by most authorities across England.
- 6.37 Beyond this number, rather than assess in-migrant households seeking to develop new sites in the area, we would propose that each case is assessed as a desire to live in the area and that site criteria rules are followed for each new site. It is important for the authorities to have clear criteria based planning policies in place for any new potential sites which do arise.

## Overall Needs

- 6.38 The estimated extra site provision that is required until 2027 is 101 pitches. This includes the existing households on unauthorised sites, those with temporary planning permissions and the growth in household numbers due to household formation. Any sites in the pipeline for development have not been included in this figure.

**Figure 16**  
**Extra Pitches which are Required in the Study Area from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	27	-	
Concealed households	0	-	
Net movement from bricks and mortar	-2	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>25</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	2	-	
Net migration to the area	0	-	
Net New household formation	74	-	
<b>Total Future Needs</b>	<b>76</b>		
<b>Total</b>	<b>101</b>	<b>0</b>	<b>101</b>

## Overall Need by Local Authority

### Babergh

6.39 The estimated extra site provision that is required until 2027 is 4 pitches. This is for households on an unauthorised site, one household with a temporary planning permission due to expire and potential household formation.

**Figure 17**  
**Extra Pitches which are Required in Babergh from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	2	-	
Concealed households	0	-	
Net movement from bricks and mortar	0	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>2</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	1	-	
Net migration to the area	0	-	
Net new household formation	1	-	
<b>Total Future Needs</b>	<b>2</b>		
<b>Total</b>	<b>4</b>	<b>0</b>	<b>4</b>

## Ipswich

6.40 The estimated extra site provision that is required until 2027 is 18 pitches which is entirely for household formation.

**Figure 18**  
**Extra Pitches which are Required in Ipswich from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	0	-	
Concealed households	0	-	
Net movement from bricks and mortar	0	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>0</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	0	-	
Net migration to the area	0	--	
Net New household formation	18	-	
<b>Total Future Needs</b>	<b>18</b>		
<b>Total</b>	<b>18</b>	<b>0</b>	<b>18</b>

## Mid Suffolk

6.41 The estimated extra site provision that is required until 2027 is 38 pitches which are entirely for household formation.

**Figure 19**  
**Extra Pitches which are Required in Mid Suffolk from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	0	-	
Concealed households	0	-	
Net movement from bricks and mortar	-1	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>-1</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	1	-	
Net migration to the area	0	--	
Net New household formation	38	-	
<b>Total Future Needs</b>	<b>39</b>	-	
<b>Total</b>	<b>38</b>	<b>0</b>	<b>38</b>

## Suffolk Coastal

6.42 The estimated extra site provision that is required until 2027 is 31 pitches which are entirely for New Traveller households on unauthorised sites plus potential household formation from these sites.

**Figure 20**  
**Extra Pitches which are Required in Suffolk Coastal from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	25	-	
Concealed households	0	-	
Net movement from bricks and mortar	0	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>25</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	0	-	
Net migration to the area	0	-	
Net New household formation	6	-	
<b>Total Future Needs</b>	<b>6</b>		
<b>Total</b>	<b>31</b>	<b>0</b>	<b>31</b>

## Waveney

- 6.43 The estimated extra site provision that is required until 2027 is 10 pitches which are entirely for household formation and does not include any anticipated new provision within the district.

**Figure 21**  
**Extra Pitches which are Required in the Waveney from 2012-2027**

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
<b>Supply of Pitches</b>			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
<b>Total Supply</b>		<b>0</b>	
<b>Current Need</b>			
Current unauthorised developments or encampments and seeking to stay in the area	0	-	
Concealed households	0	-	
Net movement from bricks and mortar	-1	-	
Waiting list for public sites	0	-	
<b>Total Current Need</b>	<b>-1</b>		
<b>Future Needs</b>			
Currently on sites with temporary planning permission	0	-	
Net migration to the area	0	-	
Net New household formation	11	-	
<b>Total Future Needs</b>	<b>11</b>		
<b>Total</b>	<b>10</b>	<b>0</b>	<b>10</b>

## Split by Local Authority to 2027

- 6.44 To calculate the split by local authority in 5 years intervals, we have included any backlog of need and temporary planning permissions due to expire in the first 5 years. Household growth has then been apportioned over time. In summary, Figure 22 sets out the net requirement for new pitch provision by local authority until 2027 in 5 year intervals.

**Figure 22**  
**Extra Pitch Provision in Suffolk by Local Authority in 5 year intervals until 2027**

Local Authority	2012-2017	2018-2022	2023-2027
Babergh	3	0	1
Ipswich	5	6	7
Mid Suffolk	11	13	14
Suffolk Coastal	26	2	3
Waveney	3	3	4
<b>Total</b>	<b>48</b>	<b>24</b>	<b>29</b>

## Transit/Emergency Stopping Site Provision

- 6.45 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. The sites can be publically or privately managed and rent is paid by the households staying on them. A transit site typically has a restriction on the length of stay of around 13 weeks and has a range of facilities such as water supply, electricity and amenity blocks. They do not have a function in meeting local need which must be addressed on permanent sites.
- 6.46 An alternative to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it, but has much more limited facilities with typically only a source of water and chemical toilets provided.
- 6.47 The presence of a transit site or emergency stopping place in an area can speed up enforcement on unauthorised encampments, with households facing committing an offence if they do not move on to the site, or leave the County. However, we would note that local authorities are not able to use transit provision on private sites as part of their enforcement action policies and therefore while it does provide an option for visiting households it is at the discretion of the site owner who is allowed on to the site.
- 6.48 The key issue in determining if there is a requirement for transit sites or emergency stopping places provision is whether there is sufficient evidence of travelling through the area.
- 6.49 There are currently no transit sites in the study area. While many of those on unauthorised encampments who were interviewed as part of the survey were seeking permanent pitches rather than transit site accommodation, there were 4 households on unauthorised sites in Mid Suffolk who did not consider their location to be their permanent base.

6.50

6.51 Figure 23 shows the recorded unauthorised encampments in the study area since 2007. This would appear to highlight a clear gap in transit site provision in the area to help to provide space for visiting households and to manage unauthorised encampments. While, the unauthorised encampments occurred predominantly in Mid Suffolk and more recently Babergh, a single transit site may not be the ideal solution for somewhere as geographically dispersed as the study area. For example, a site in Babergh may not be suitable for those who wish to visit Suffolk Coastal.

**Figure 23**  
**Unauthorised Encampments 2007-2012**

Reason for Requirement/Vacancy	2007	2008	2009	2010	2011
Babergh	2	5	3	7	12
Ipswich	2	9	9	4	3
Mid Suffolk	5	9	3	17	18
Suffolk Coastal	6	3	2	1	2
Waveney	1	3	1	1	3
<b>Total</b>	<b>16</b>	<b>29</b>	<b>18</b>	<b>30</b>	<b>38</b>

6.52 ORS has spoken to a number of local authorities across the country whom indicated that publically provided transit sites are poorly used and have, in some cases have fallen out of use, this was primarily due to either;

- » A lack of a major travelling route in the area; or
- » Locating the site too far from major routes.

6.53 Due to these difficulties, in other studies similar to the current one, ORS has recommended against formal transit provision, instead recommending the institution of a temporary toleration policy.<sup>2</sup>

6.54 In the case of Suffolk, the above concerns would seem to have less force. It seems that in most cases, unauthorised encampments in the area are not due to Travellers using the area as a stop-off point in a longer journey, but that Suffolk is the destination for their journey – for the purpose of visiting relatives, attending family events or working. Nonetheless, any transit must be located within reasonable distance of areas currently favoured as stopping points for Travellers.

6.55 Therefore, given the size of the area and the total scale of encampments this study identifies a need for 3 different 8 pitch transit sites or emergency stopping places to help to manage unauthorised encampments and provide for visiting households. We would note that transit sites and emergency stopping places are an area where cross boundary working could prove to be particularly effective and that the needs of Gypsy and Travellers visiting Suffolk are an issue which should be considered at a strategic level. If a transit site or emergency stopping place is provided, the location must be chosen carefully to ensure its use by visiting households or it will simply become a mechanism for speeding up enforcement action against unauthorised encampments.

<sup>2</sup> For an example of a such a policy, see the Worcestershire District Authorities and West Mercia Police's 'Joint Policy Towards Unauthorised Encampments of Gypsies and Travellers in Worcestershire'. The policy can be found here: <http://www.worcestershire.gov.uk/cms/pdf/unauthorised%20encampments%20joint%20policy.pdf>

## Needs for Plots for Travelling Showpeople

- 6.56 The estimated need for plots for Travelling Showpeople is much simpler to model than for Gypsies and Travellers. There are no households on unauthorised sites, no plots are expected to be freed due to any reason, there is no pressure on existing sites and there is no waiting list for sites.
- 6.57 Planning Permission approved for three pitches in May 2013. Therefore, the needs are driven by a single outstanding planning permission for 3 plots at a yard at Wattisfield in Mid Suffolk. These three plots represent the only immediate need. Given the limited size of the population and the fact that Travelling Showpeople household numbers tend to grow at a slower rate than Gypsies and Travellers we have not allowed for any additional need generated by household growth because the existing sites may be able to accommodate this.
- 6.58 However, we would note that the Showmen's Guild reported that there are a number of Showmen currently looking for new sites in the area. Therefore, it is important for the authorities to have criteria based planning policies in place in the event of someone seeking to develop a new Travelling Showpeople's yard or expand an existing one in the area.

## 7. Conclusions

### Summary

<sup>7.1</sup> This chapter brings together the evidence presented earlier in the report to provide some key policy conclusions for the study area. It focuses upon the key issues of future site provision for Gypsies and Travellers and also Travelling Showpeople.

### Gypsy and Traveller Future Pitch Provision

<sup>7.2</sup> Based upon the evidence presented in Chapter 6, the estimated extra pitch provision that is required for Gypsies and Travellers in the next 15 years is 101 pitches. The table below shows the requirement by local authority by type of pitch in 5 year intervals. These figures should be seen as the minimum amount of provision which is necessary to meet the statutory obligations towards identifiable needs of the population.

**Figure 24**  
**Extra Pitch Provision in Suffolk by Local Authority in 5 year intervals until 2027**

Local Authority	2012-2017	2018-2022	2023-2027
Babergh	3	0	1
Ipswich	5	6	7
Mid Suffolk	11	13	14
Suffolk Coastal	26	2	3
Waveney	3	3	4
<b>Total</b>	<b>48</b>	<b>24</b>	<b>29</b>

### Transit Sites

<sup>7.3</sup> Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. Given the size of the area and the total scale of encampments this study identifies a need for 3 different 8 pitch transit sites or emergency stopping places to help to manage unauthorised encampments and provide for visiting households.

<sup>7.4</sup> We would note that transit sites and emergency stopping places are an area where cross boundary working could prove to be particularly effective and that the needs of Gypsy and Travellers visiting Suffolk are an issue which should be considered at a strategic level. The location of any transit site should reflect the pattern of unauthorised encampments. It would be advisable for transit sites to be identified and provided in the next five years.

### Travelling Showperson Requirements

- 7.1 The only current evidence of need for Travelling Showpeople is from a single recently met planning application for 3 plots in Mid Suffolk. However, the Showmen’s Guild have confirmed that other Travelling Showpeople households are looking for sites in the study area.

## A Supply of Deliverable and Developable Sites

### **Safeguarding existing sites**

- 7.2 In developing their local plans, “Planning Policy for Traveller Sites” requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites sufficient to provide five years’ worth of sites against those locally set targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.
- 7.3 We would suggest that an initial starting point would be for the Councils to safeguard existing authorised public Gypsy, Traveller and Travelling Showpeople sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch and plot targets.

### **Broad Geographical Locations**

- 7.4 Where specific deliverable or developable sites for further Gypsy, Traveller and Travelling Showpeople provision cannot be identified, the Councils should consider including broad geographical locations within their Local Plans.
- 7.5 This document recommends that the identification of further Gypsy, Traveller and Travelling Showpeople residential sites should focus on the broad geographical locations and should take into account where the need arises and the capacity of local infrastructure to determine the most appropriate broad location to commence the site search.
- 7.6 If suitable sites cannot be identified within the most appropriate broad location, other broad locations should be investigated before sites outside broad locations are considered.
- 7.7 The Councils should investigate the provision of public sites within the most sustainable broad locations, particularly in locations where there is good access to main facilities and services such as local hospitals.
- 7.8 The Councils should be reasonably flexible about the location of small private sites and should consider sites outside but close to the broad locations.

### **Sites with Potential to Meet Future Needs**

- 7.9 The Councils should investigate the potential from existing sites to achieve additional pitches/plots either through increasing the capacity within existing boundaries or through site extension onto adjoining land.
- 7.10 The Councils should also undertake site assessment work to identify new sites to meet identified future Gypsy and Traveller needs.
- 7.11 If there is an immediate need to identify a supply of deliverable sites to provide a five years’ worth of sites, then the Councils should consider supporting planning applications on the most appropriate sites.

- 7.12 To provide a medium and long term supply, the Councils should consider allocating sites through their Local Plans. This should be included within the appropriate new style Local Plan which may be a single issue plan or some appropriate alternative.

### **Delivery**

- 7.13 As with other forms of development, the release of Gypsy, Traveller and Travelling Showpeople sites should be managed to ensure a good fit with identified need.
- 7.14 There is no direct correlation between existing and future needs and sites which may have potential to meet those needs. For example, a family may need further pitches in the future to meet the future needs from existing children, but their current site may not have capacity, whilst an existing family may not require pitches in the future but they may have a site where there is potential for future provision.
- 7.15 It is important to note that the future availability of existing private sites to accommodate needs is dependent on existing site owners being prepared to accommodate future needs on these sites.
- 7.16 It is also important to note that Romany Gypsies and Irish Travellers have separate traditions and patterns of movement and may not be prepared to share sites. Similarly, Travelling Showpeople families operate separate commercial businesses and are unlikely to share sites.
- 7.17 There is therefore a strong likelihood that more than the bare minimum of pitches will need to be identified and brought forward to provide a flexible and sufficient pool of sites to meet identified existing and future needs.
- 7.18 It would be prudent for the Councils to identify a potential reserve supply from the identified sites or other sites which could be brought forward in the future if required to ensure a continuous supply of deliverable and developable sites.
- 7.19 The Councils should consider whether there is scope to work together to meet identified needs across district boundaries.

### **Phasing, Monitoring and Review**

- 7.20 Any release of land to meet future needs would require active monitoring of supply against need, at least on an annual basis. It would also require the Councils to undertake periodic reviews of the needs evidence base.

### **Site Criteria**

- 7.21 To meet any other unidentified need through the plan period and to provide a base for considering planning applications, we would recommend the development of suitable criteria policies, which could be incorporated within each Council's **new style Local Plan**.