Babergh and Mid Suffolk Gypsy and Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment

Report

# May 2024

RRR Consultancy Ltd



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# **Executive Summary**

### Introduction

- ES1. In 2023 Babergh District Council (BDC) and Mid Suffolk District Council (MSDC) commissioned RRR Consultancy Ltd to undertake a Gypsy, Traveller, Travelling Showpeople and boat dweller Accommodation Assessment (GTAA) for the period up to 2037. The findings of this study should be used to assist policy development and planning decision making and supersedes any previous GTAAs (including any accommodation needs calculated prior to this assessment) for the Babergh and Mid Suffolk local planning authorities.
- ES2. The requirement to assess the accommodation needs of Gypsies and Travellers, Showpeople, non-Gypsy and Traveller, Gypsy and Traveller, residential caravan dwellers, and boat dwellers is established through national guidance contained in <u>'Planning Policy for Traveller Sites'</u> (Department of Communities and Local Government (DLUHC), December 2023).<sup>1</sup>
- ES3. To achieve the study aims, the research drew on a number of data sources including:
  - Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2023) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Consultation with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, Showpeople and boat dwellers.
  - Consultation with Gypsies and Travellers and Showpeople, covering a range of issues related to accommodation and service needs.
- ES4. The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

### **Policy context**

ES5. On 19 December 2023, the government announced changes to Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal

<sup>&</sup>lt;sup>1</sup>. It should be noted that PPTS 2023 requires local authorities to determine the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The Roma community is an ethnic group separate from the Gypsy and Traveller community, which may include Eastern Europeans who prefer to reside in bricks and mortar homes rather than on pitches.

judgment in the case of Smith v SSLUHC & Others (October 2022). The government intends to review this area of policy and case law further in 2024. Like the 2015 update, the 2023 version is to be read in conjunction with the National Planning Policy Framework.

- ES6. Whilst it is clear that the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age have ceased to travel, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- ES7. Given differences in defining Gypsies and Travellers, this GTAA provides two accommodation needs figures: first, one based on the ethnic identity definition; second, based on the PPTS 2023 definition. The two accommodation needs definitions are discussed in more detail in Chapter 2.
- ES8. In March 2016, the Department of Communities and Local Government (DCLG) published its <u>Review of housing needs for caravans and houseboats: draft guidance</u> to local housing authorities on the periodical review of housing needs for caravans and houseboats.<sup>2</sup> It states that, when considering the need for caravans and houseboats, local authorities must include the needs of a variety of residents in differing circumstances including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- ES9. According to the NPPF (2023) and related planning practice guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs, and address the needs of groups with specific housing requirements. The NPPF (2023) refers to the need to both assess and then address the accommodation needs of those who are covered by the definition of the PPTS 2023.
- ES10. Babergh District Council and Mid Suffolk District Council are working together on the Babergh and Mid Suffolk Joint Local Plan (JLP). This will consist of two important Development Plan Documents, which include planning policies for the determination of planning applications in the Districts. Part 1 was adopted in November 2023 and will later be followed by a Part 2 Plan. The Plan area covers Babergh and Mid Suffolk, and the Plan period runs from 2018 to 2037. Policy SP04 of the Local Plan (Part 1) (2023) outlines the criteria for implementing new Gypsy and Traveller sites.

<sup>&</sup>lt;sup>2</sup> In respect of this report, the 2016 draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Age Travellers, and Travelling Showpeople.

### **Population Trends**

- ES11. In October 2023 there were 2 privately owned pitches in Babergh. In Mid Suffolk there were 47 privately owned authorised pitches, 7 pitches with temporary planning permission, and 6 pitches situated on unauthorised developments i.e. sites without planning permission. As discussed in chapters 3 and 5, there are 50 pitches with planning permission, but not currently counted in the supply figures as they are not currently occupied by Gypsies and Travellers. The supply will increase as any of the 50 pitches with planning permission become occupied by Gypsies and Travellers. An increase in supply will lead to lower accommodation need.
- ES12. There are also 2 Travelling Showpeople yards in the study area consisting of 5 plots, over 280 leisure moorings, and 21 permanent moorings located in Babergh.
- ES13. The 2021 Census indicates that there were 133 Gypsies and Travellers residing in Babergh and Mid Suffolk representing about 0.07% of the total population compared to 0.12% in Suffolk and 0.11% in England. The DLUHC January 2023 Count shows there were 107 Gypsy and Traveller caravans located in the study area including 86 caravans on private pitches consisting of 77 with permanent planning permission and 9 with temporary planning permission, and 21 unauthorised caravans on land owned by Gypsies and Travellers.
- ES14. The total number of caravans on authorised pitches in the study area over the period January 2020 to July 2023 varied widely with a maximum of 108 caravans recorded in January 2023 compared to a minimum of 36 caravans recorded in July 2021 (a difference of 69 caravans). A total of 70 unauthorised encampments recorded by the two local authorities between 2018 and 2023. The number of unauthorised encampments recorded in each year ranged from a maximum of 57 in 2019 to a minimum of 4 in 2023. Most (85%) of unauthorised encampments consisted of between 1 and 5 vehicles with only a relatively small proportion (14%) consisting of 6 vehicles or more.
- ES15. In relation to density, as part of the DLUHC July 2023 Traveller Caravan Count, Babergh recorded 1 caravan per 100,000 population compared to 101 in Mid Suffolk. In contrast, Ipswich recorded 43 caravans per 100,000 population, and East Suffolk and West Suffolk 45. This compares to 98 caravans per 100,000 population in relation to the East of England and 42 in relation to England.

### Accommodation need

ES16. Accommodation need in the study area was assessed using analysis of primary and secondary data. The accommodation needs calculation steps are based on a model in accordance with both previous (2007) and current Practice Guidance (2015) issued by the Department of Communities and Local Government (DCLG). Although the 2007

guidance was withdrawn in 2016, it remains useful as a model to determine accommodation needs given that it outlines the basic principles to be applied when undertaking GTAAs. It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data.

ES17. Table ES1 summarises permanent accommodation need over the period 2023-2037. It is important to note that the figures shown in Table ES1 include all need as of 2023, including any which may have been identified by previous GTAAs but remained unfulfilled by October 2023. The tables collectively show that 38 new permanent Gypsy and Traveller pitches (based on the ethnic identity definition), and 32 new permanent pitches (based on PPTS 2023) are needed over the period 2023-2037 in the study area. Although the surveys undertaken with Gypsy, Traveller, and Travelling Showpeople households asked about the preferred location of any new provision, respondents did not state any preference. They were more likely to state that they would prefer to remain close to family members already residing in the study area.

### Table ES.1: Gypsy and Traveller permanent accommodation need (summary)

Study area						
Period	Ethnic definition	PPTS 2023 definition				
2023-28	25	20				
2028-33	6	6				
2033-37	7	6				
Total	38	32				
	Source: GTAA	2024				
Babergh						
Period	Ethnic definition	PPTS 2023 definition				
2023-28	3	1				
2028-33	0	0				
2033-37	1	1				
Total	4	2				
	Source: GTAA 2024					
Mid Suffolk						
Period	Ethnic definition	PPTS 2023 definition				
2023-28	22	19				
2028-33	6	6				
2033-37	6	5				
Total	34	30				
	Source: GTAA	2024				

ES18. There is also a need for an additional 10 permanent Travelling Showpeople plots. Both supply and additional need relate only to Mid Suffolk (as there are no known yards in Babergh).

### Table ES.2: Travelling Showpeople permanent accommodation need (summary)

Period	Mid Suffolk
2023-28	7
2028-33	1
2033-37	2
Total	10
	Source: GTAA 2024

- ES19. In relation to transit provision, the GTAA also recommends that the local authorities adopt a negotiated stopping policy. This involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The advantages of this approach are set out in detail in Chapter 5.
- ES20. There is a need for 12 additional residential moorings over the period 2023-2037. This accommodation need only relates to Babergh, as there are no known navigable waterways in Mid Suffolk.

# Table ES.3: Boat Dweller accommodation needs permanent accommodation need (summary)

Period	Babergh
2023-28	10
2028-33	1
2033-37	1
Total	12

Source: GTAA 2024

### **Conclusions and recommendations**

- ES21. There is an overall accommodation need in the study area for the local plan period for 38 additional pitches (ethnic definition), and 32 pitches (PPTS 2023 definition). It is recommended that the authorities incorporate a policy to address negotiated stopping places for transient and / or visiting Gypsy and Traveller encampments. There is also an identified need for 10 additional Travelling Showpeople plots and 12 permanent residential moorings for boat dwellers during the same period.
- ES22. This GTAA recommends adopting the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed.
- ES23. Alternatively, the local authorities may adopt the 'PPTS 2023 definition accommodation needs figures with the difference between the PPTS 2023 figures and 'Ethnic' definition being an additional need that the council(s) may choose to meet. Page 7

This means that the local authorities would first meet the need of 32 (20 within the first 5 years) as the obligation but accept the need of a further 6 (5 within the first 5 years) as potential need if further applications are brought forward through windfalls.

- ES24. It is also recommended that the local planning authorities consider the accommodation needs that might materialise over the plan period from households (Gypsies, Travellers, Travelling Showpeople and boat dwellers) not considered by this assessment. This could include households residing on unauthorised developments, unauthorised encampments, new households due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified below and could be met through windfall applications.
- ES25. In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:
  - In relation to Gypsies and Travellers and Travelling Showpeople it is recommended that the local authorities work closely with families to determine how their accommodation need can best be met.
  - Also, for the local authorities to provide pre-planning application advice to households who have identified land, to help determine if it is suitable to address accommodation need.
  - In order to meet the accommodation needs of Showpeople, it is also recommended that the local authorities work closely with yard owners to determine how the proposed land that they have already identified, and other potential land could meet their current and future accommodation needs.
  - It is recommended that the local authorities review the planning of unauthorised developments and consider granting permanent status.
- ES26. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

Planning policy:

- To identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites, yards or moorings.
- To consider alternative options for developing new sites, yards and moorings such as developing them on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development

Financial Institutions; and joint ventures with members of the Gypsy and Traveller, Showpeople and boat dweller communities.

- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups, and NBTA), to review its current, historic and potential planning status, and review the most effective way forward.
- To consider safeguarding Gypsy and Traveller site and Travelling Showpeople yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- To review the planning and license status of sites not occupied by Gypsies and Travellers and determine if it is better to change their status to residential or reuse them for Gypsies and Travellers. Implement a corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To work closely with NBTA to meet the needs of the boat dwellers and constant cruisers across the study area.
- To liaise with marinas and boat yards in the area to see which could accommodate more permanent residential moorings (including converting some of their leisure moorings to permanent).
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

### Management:

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies, Travellers, Showpeople and boat dwellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the <u>Equality Act 2010</u>.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.

• Better sharing of information between agencies in relation to Gypsy, Traveller, Showpeople and boat dweller communities.

# **1. Introduction**

### Study context

- 1.1 In 2023 Babergh District Council (BDC) and Mid Suffolk District Council (MSDC) commissioned *RRR Consultancy Ltd* to undertake a Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) for the period up to 2037. The findings of this study should be used to assist policy development and planning decision making and supersedes any previous GTAAs (including any accommodation needs calculated prior to this assessment) for the two local planning authorities.
- 1.2 The requirement to assess the accommodation needs of Gypsies and Travellers, Showpeople, non-Gypsy and Traveller Gypsy and Traveller residential <u>caravan</u> dwellers, and <u>boat dwellers</u> is established through national guidance contained in <u>'Planning Policy for Traveller Sites'</u> (DHULC, 2023)<sup>3</sup>.

### Methodological context

- 1.3 To achieve the study aims, the research drew on a number of data sources including:
  - Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (July 2023) Department for Levelling Up, Housing & Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Consultation with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Showpeople.
  - Consultation of Gypsies and Travellers and Showpeople, covering a range of issues related to accommodation and service needs.

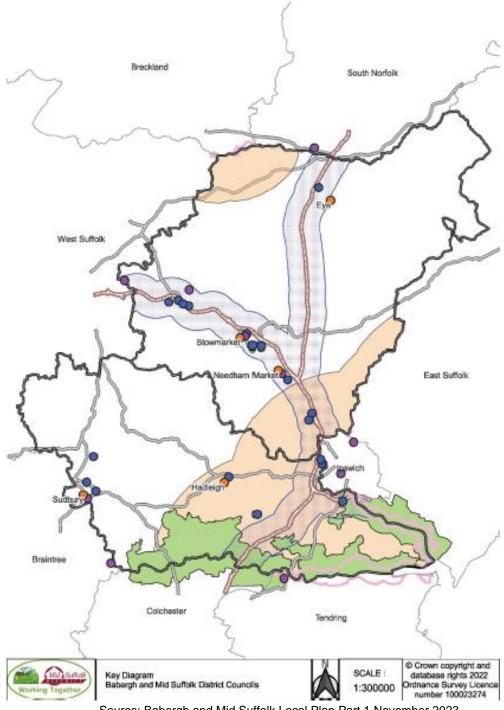
### GTAA study area

1.4 Figure 1.1 below shows a map of the study area and neighbouring local authority areas including National Landscapes (shaded in green) and Protected Habitats Mitigation Zones<sup>4</sup> (shaded in sand).

<sup>&</sup>lt;sup>3</sup> It should be noted that PPTS 2023 requires local authorities to determine the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The Roma community is an ethnic group separate from the Gypsy and Traveller community, which may include Eastern Europeans who prefer to reside in bricks and mortar homes rather than on pitches.

<sup>&</sup>lt;sup>4</sup> Protected Habitats Mitigation Zones act as a trigger for when development must consider impacts upon Habitats sites and when Natural England will need to be consulted at a site-by-site basis.

### Figure 1.1: Study area map



Source: Babergh and Mid Suffolk Local Plan Part 1 November 2023

### Spatial characteristics of the study area

1.5 Babergh and Mid Suffolk are predominantly rural districts covering the geographical centre of Suffolk, running from the boundary with Essex in the south to the boundary with Norfolk in the north. This covers a total area of approximately 1,463 square kilometres.

- 1.6 According to the 2021 Census the population of Babergh District is 92,300 persons whilst the population of Mid Suffolk population is 102,700.<sup>5</sup> Across Babergh and Mid Suffolk, more than half the population live in villages and rural areas. Together the Districts have six population centres; which include Eye, Needham Market and Stowmarket in Mid Suffolk; Pinewood, Hadleigh and Sudbury in Babergh. The historic market towns are surrounded by a rural hinterland comprising 198 rural parishes.
- 1.7 Babergh and Mid Suffolk are heavily influenced by large centres of population with Ipswich in the east, Bury St Edmunds in the west, Diss and Harleston in the north. This is reinforced by the area's strategic transport connectivity with main road and rail links including the A12/A14/A140 main roads from London to Felixstowe and Cambridge, together with main line rail links from London to Cambridge and Norwich and a strategic link for freight traffic from Felixstowe to Nuneaton in the Midlands. A large portion of Mid Suffolk has direct access to the A14 and the main line railway between London/Ipswich/Norwich and Cambridge. Babergh has less accessibility with a smaller proportion of its area served directly by the east A12 and north by the A14 and no main line railway stations.<sup>6</sup>

### Waterways in the study area

1.8 Babergh and Mid Suffolk are traversed by several rivers. The primary rivers in these areas include:

River Stour: This river forms part of the boundary between Suffolk and Essex. It is a significant river in the Babergh district. Parts of the River Stour are navigable, particularly for smaller craft such as canoes and kayaks. The navigable section is known as the Stour Navigation and extends from Sudbury to Cattawade near Manningtree.

River Orwell: While this river primarily flows through the borough of Ipswich, it also touches parts of the Babergh district. The Orwell is a navigable river, especially famous for the Orwell Bridge near Ipswich. It is used for both commercial and recreational navigation.

River Gipping: This is the name for the non-tidal section of the River Orwell as it stretches inland. It passes through the Mid Suffolk district. Historically, this river had a navigable section known as the Ipswich and Stowmarket Navigation, but currently, it's primarily used for leisure activities and is not fully navigable for larger vessels.

<sup>&</sup>lt;sup>5</sup> Population and household estimates, England and Wales: Census 2021, 28 June 2022.

<sup>&</sup>lt;sup>6</sup> Babergh and Mid Suffolk Local Plan Part 1 November 2023 p.6

River Waveney: Part of the border between Suffolk and Norfolk, this river might touch parts of Mid Suffolk. The River Waveney is navigable, particularly popular among boaters and canoeists.

River Brett: A tributary of the River Stour, this river flows through Babergh. The Brett is not a navigable river.

River Box: Another tributary of the Stour, passing through Babergh. Like the Brett, it is not navigable.

1.9 These rivers, especially the Stour and Orwell, play a significant role in the landscape and ecology of the Babergh and Mid Suffolk areas. The navigability of these rivers varies, with some being important for recreational boating and others being nonnavigable, serving more for their ecological and scenic value.

### Summary

- 1.10 The purpose of this assessment is to quantify the accommodation needs of Gypsies and Travellers, Travelling Showpeople, and boat dwellers in the study area between 2023 and 2037. This is in terms of permanent pitches, sites, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. This report will form part of the evidence base for the Local Plan review.
- 1.11 To achieve the study aims, this report focusses on the assessment of accommodation need for Gypsies, Travellers, Travelling Showpeople, and boat dwellers. The research provides a range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

## 2. Policy context

### Introduction

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

### **National Policies**

### <u>'Planning Policy for Traveller Sites'</u> (PPTS) (December 2023)

- 2.3 On 19 December 2023, the government announced changes to Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. The key difference between the PPTS published in August 2015 and the December 2023 version primarily involves changes made in response to a recent legal judgment and ongoing policy reviews.
- 2.4 In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022). The government intends to review this area of policy and case law further in 2024. Like the 2015 update, the 2023 version is to be read in conjunction with the National Planning Policy Framework.
- 2.5 The key difference between PPTS 2015 and 2023 is that the former removed the word 'permanently' from the planning definition of Gypsies and Travellers. This meant that local planning authorities were not obliged to consider the accommodation needs of Gypsy and Traveller households who had permanently ceased to travel.
- 2.6 However, the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that PPTS was discriminatory, by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers.

- 2.7 The guidance emphasises the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:
  - effectively engage with traveller communities
  - co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas
  - and use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.

### National Planning Policy Framework (December 2023)

2.8 According to NPPF (2023) and related planning practice guidance a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs, and address "the needs of groups with specific housing requirements. The NPPF (2021) referred to the need to both assess and then address the accommodation needs of those who are covered by the definition of the PPTS 2023. The Human Rights Act 1998 and Equalities Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan.

### **Definition Context**

- 2.9 The DLUHC's December 2023 definition of Gypsies and Travellers<sup>7</sup>, is set out below:
  - 1. For the purposes of this planning policy "gypsies and travellers" means:

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

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

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

<sup>&</sup>lt;sup>7</sup> See: https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites.

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

- 2.10 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equalities Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>8</sup>.
- 2.11 The DCLG definition of Travelling Showpeople is:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.<sup>9</sup>

- 2.12 For the purposes of this planning policy, "Travellers" means "Gypsies and Travellers" and "Travelling Showpeople" as defined above from PPTS annex 1. Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAAs), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the <u>Review of housing needs for caravans and houseboats: draft guidance</u> to local housing authorities on the periodical review of housing needs (March 2016).<sup>10</sup> It recommends that Travelling Showpeople's own accommodation needs and requirements should be separately identified in the GTAA<sup>11</sup>. This GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG <u>'Planning Policy for Traveller Sites'</u> (December 2023) (see above).
- 2.13 It is important to note that Gypsies and Travellers and Travelling Showpeople have separate accommodation need requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. As well as space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.

 <sup>&</sup>lt;sup>8</sup> DCLG, Consultation on revised planning guidance in relation to Travelling Showpeople, January 2007, p. 8
 <sup>9</sup> DCLG, Planning Policy for Traveller Sites, August 2015.

<sup>&</sup>lt;sup>10</sup> In respect of this report, the 2016 draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Age Travellers, and Travelling Showpeople.

<sup>&</sup>lt;sup>11</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities* on the periodical review of housing needs (Caravans and Houseboats) March 2016.

- 2.14 Whilst it is clear that the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age have ceased to travel, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.15 One interpretation is that 'a nomadic habit of life' means travelling for an economic purpose. Previous case law e.g. R v Shropshire CC ex p Bungay (1990) and Hearne v National Assembly for Wales (1999) has been used to support this point. There is nothing within PPTS 2015 which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling.
- 2.16 More recent Planning Inspectors' reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a 2016 planning appeal decision regarding a site at Throcking, Hertfordshire, concluded the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence "that he is currently a person of a nomadic habit of life"<sup>12</sup> for employment purposes (i.e. he did not meet the August 2015 PPTS definition).
- 2.17 In contrast, some other Planning Inspectors' reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010<sup>13</sup>.
- 2.18 Similarly, a local authority rejected a planning application as it determined that the household did not meet the PPTS 2023 definition. However, despite evidence that the family had reduced the extent to which they travel due to educational requirements, the Planning Inspector allowed the s78 appeal on the basis that they should be regarded as Gypsies for planning purposes<sup>14</sup>. Also, in deciding whether to allow a S78 appeal for a site in West Kingsdown, Kent, the Planning Inspector acknowledged that the local authority included within its future calculations the accommodation needs (in terms of pitches) of 'cultural' Gypsies and Travellers<sup>15.</sup>

<sup>&</sup>lt;sup>12</sup> Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire SG9 9RD, 6 December 2016.

<sup>&</sup>lt;sup>13</sup> Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

<sup>&</sup>lt;sup>14</sup> Appeal Ref: APP/U2235/W/18/3198435 Ten Acre Farm, Love Lane, Headcorn TN27 9HL 9 May 2019.

<sup>&</sup>lt;sup>15</sup> Appeal Ref: APP/G2245/W/17/3170535 Land north-west of Eagles Farm, Crowhurst Lane, West Kingsdown, Kent

TN15 6JE 27 November 2018.

2.19 Much case law precedes the December 2023 definition. The commonly cited R v South Hams DC ex parte Gibb et al judicial decision was undertaken in response to the now partly repealed Caravan Sites Act 1968. Also, it is increasingly recognised that defining Gypsies and Travellers in terms of employment status may contravene human rights legislation. For example, in 2003 the Welsh Assembly's Equality of Opportunity Committee noted the:

> '...apparent obsession with finding ways to prove that an individual is not a 'Gypsy' for the purposes of the planning system. This approach is extremely unhelpful...and there can be no doubt that actual mobility at any given time is a poor indicator as to whether someone should be considered a Gypsy or a Traveller<sup>16</sup>.

- 2.20 In September 2019 the Equality and Human Rights Commission published research into the impact of the PPTS 2023 definition on assessing accommodation needs<sup>17.</sup> The research examined a sample of 20 GTAAs undertaken since the August 2015 revised definition. The report found that there had been a 73% reduction in accommodation need in post-2015 GTAAs compared to pre-2015 GTAAs undertaken by the same local planning authorities.
- 2.21 Importantly, on 31 October 2022, the Court of Appeal determined that PPTS 2015 was discriminatory in relation excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. The case relates to Lisa Smith who resides on a site occupied by Ms Smith, her husband, their children and grandchildren. Two of Ms Smith's adult sons are severely disabled and cannot travel for work. The judgment determined that PPTS 2015 characterises nomadic Gypsies and Travellers as different from Gypsies and Travellers who, as a result of age or disability, are no longer able to travel. This creates sub-classes of an ethnicity which 'seems to sit uneasily with the stated aim of PPTS 2015 to facilitate the "traditional" way of life" of Gypsies and Travellers, and not simply the "nomadic" way of life'. The judgement concluded that the objective of PPTS 2015 in excluding households from being defined as Gypsies and Travellers was not 'fairness'.
- 2.22 Given the above, our approach is to use a methodology which provides first, an accommodation need figure based on ethnic identity; and second, a figure based on the PPTS (August 2015). Different GTAAs reach differing conclusions on which approach / definition to adopt and it is for local authorities to decide individually which approach to take for planning purposes. It is recommended that this be kept under

<sup>&</sup>lt;sup>16</sup> Welsh Assembly 2003 cited in Johnson, Murdoch and Willers, The Law Relating to Gypsies and Travellers, no date).

<sup>&</sup>lt;sup>17</sup> Equality and Human Rights Commission, Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs, Research Report 128, September 2019 located at:

https://www.equalityhumanrights.com/sites/default/files/190909\_gypsy\_and\_traveller\_sites\_-

\_impact\_of\_the\_revised\_definition\_-\_final.pdf

review in the light of evolving appeal decisions and case law. This GTAA recommends adopting the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed. An alternative is the adoption of the PPTS figure and for the difference between the PPTS and ethnic based need to be covered by a criteria-based policy. It is recommended that the work interpretation of need should simply be used as a form of reference and comparison with other authorities who use this approach.

# DCLG <u>Review of housing needs for caravans and houseboats: draft guidance (March</u> 2016)<sup>18</sup>

- 2.23 The 2016 DCLG draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats states that when considering the need for caravans and houseboats local authorities should include the needs of a variety of residents in differing circumstances, for example:
  - Caravan and houseboat dwelling households:
    - who have no authorised site anywhere on which to reside
    - whose existing site accommodation is overcrowded<sup>19</sup> or unsuitable, but who are unable to obtain larger or more suitable accommodation
    - who contain suppressed households who are unable to set up separate family units and
    - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
  - Bricks and mortar dwelling households:
    - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).
- 2.24 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Travellers, and Travelling Showpeople.

<sup>&</sup>lt;sup>18</sup> See https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance

<sup>&</sup>lt;sup>19</sup> Overcrowding e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its caravan accommodation and insufficient space on the pitch or site for a further caravan (DCLG 2007 p.25)

- 2.25 The guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:
  - their nomadic or semi-nomadic pattern of life
  - their preference for caravan and houseboat-dwelling
  - movement between bricks-and-mortar housing and caravans or houseboats
  - their presence on unauthorised encampments or developments.
- 2.26 Also, it suggests that as mobility between areas may have implications for carrying out an assessment local authorities should consider:
  - co-operating across boundaries both in carrying out assessments and delivering solutions
  - the timing of the accommodation needs assessment
  - different data sources.
- 2.27 Finally, the DCLG draft guidance (2016) states that, in relation to Travelling Showpeople, account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.

### Housing and Planning Act 2016

- 2.28 The <u>Housing and Planning Act 2016</u> which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, the DCLG <u>'Planning Policy for Traveller Sites'</u> (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.29 The <u>Housing and Planning Act 2016</u> requires Local Housing Authorities (LHAs) to consider the needs of people residing on places on inland waterways where houseboats can be moored. The term 'houseboat' is not defined by DCLG guidance. As such, the GTAA adopts the National Bargee Travellers Association's (NBTA) definition who define a boat dweller as:

"Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932".

### **Local Planning Policies**

### Babergh and Mid Suffolk Local Plan Part 1 (adopted November 2023)

- 2.30 Babergh District Council and Mid Suffolk District Council are working together on the Babergh and Mid Suffolk Joint Local Plan (JLP). This will consist of two important Development Plan Documents, which include planning policies for the determination of planning applications in the Districts. Part 1 was adopted in November 2023 and will later be followed by a Part 2 Plan. The Plan area covers Babergh and Mid Suffolk, and the Plan period runs from 2018 to 2037.
- 2.31 Policy SP04 of the Local Plan (Part 1) (2023) outlines the criteria for implementing new Gypsy and Traveller sites:

1. Proposals for the development of sites for Gypsies and Travellers and Travelling Showpeople, within or outside settlement limits, will be approved where they accord with the Planning Policy for Traveller Sites and Policy SP09.

2. Sites with permission for these uses or in current use, will be protected for these uses unless it can be demonstrated they are no longer required to meet the district-wide need.

### Duty to cooperate and cross-border issues

- 2.32 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Also, the need for councils to cooperate reflects the characteristic that Gypsy and Traveller travelling patterns transcend local authority borders<sup>20</sup>.
- 2.33 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide

<sup>&</sup>lt;sup>20</sup> It should be noted that the government' white paper 'Planning for the Future' (August 2020) indicates that it intends to abolish the duty to cooperate.

more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.

- 2.34 As part of this assessment, consultation in relation to Gypsies, Travellers and Travelling Showpeople and boat dwellers, was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in Chapter 4.
- 2.35 Given the transient nature of Gypsies and Travellers it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section summarises the results of GTAAs recently undertaken by both the two study area local authorities (which have commissioned this assessment) and neighbouring or nearby local authorities specifically in relation to accommodation need and travelling patterns (see Figure 1.1 'Study Area Map' above for authorities bordering the study area).

### Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney GTAA 2017

2.36 According to the 2017 Accommodation Needs Assessment (ANA), the estimated extra site provision that is required between 2016 and 2036 is 73 pitches (1 pitch in Babergh, 27 in Ipswich, 9 in Mid Suffolk, 15 in Suffolk Coastal, and 21 in Waveney). This includes 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. The report also identified a need for 3 different 8 pitch transit sites or emergency stopping places to help to manage unauthorised encampments and provide for visiting households. The report also identifies a need for 9 additional Travelling Showpeople plots (7 in Mid Suffolk and 2 in Suffolk Coastal), and 28 residential boat moorings (10 moorings in Babergh, 0 in Ipswich, 0 in Mid Suffolk, 17 in Suffolk Coastal, and 1 in Waveney). This GTAA updates the accommodation needs in relation to Babergh and Mid Suffolk.

### Essex, Southend-on-Sea and Thurrock GTAA 2016

2.37 The GTAA was undertaken on behalf of 14 local authorities. For the period 2016-2033 it found an overall need in the Greater Essex area for 110 additional pitches for Gypsy and Traveller households that meet the planning definition; for up to 186 additional pitches for unknown Gypsy and Traveller households that may meet the planning definition; and for 243 additional pitches for Gypsy and Traveller households that do not meet the planning definition. It also found a need during the same period for 36 additional plots for Travelling Showpeople households that meet the planning definition; for up to 8 additional plots for unknown Travelling Showpeople households that may meet the planning definition; and for no additional plots for Travelling Showpeople households that do not meet the planning definition; and for no additional plots for Travelling Showpeople households that do not meet the planning definition. In relation to transit provision, the GTAA recommended that the situation relating to levels of unauthorised encampments throughout the area should continue to be monitored by the Essex

County Traveller Unit (ECTU) whilst potential changes associated with PPTS (2015) developed.

### Greater Norwich GTAA 2022

2.38 The GTAA was undertaken on behalf of Broadland District Council, Norwich City Council, and South Norfolk District Council. Over the period 2022-2038 the GTAA found a need for a further 50 Gypsy and Traveller pitches (based on the ethnic identity definition), and 29 pitches (based on PPTS 2015) are needed over the 16-year period. The ethnic need includes the 29 who meet the PPTS definition, and the 21 who do not, whilst the PPTS needs relates only to those who meet the PPTS definition. The GTAA also identified a need for 43 additional Travelling Showpeople plots over the 16-year period. In relation to transit provision, it is recommended that the local authorities set up a negotiated stopping places policy to address transit provision.

### Norfolk GTAA 2017

2.39 The GTAA was undertaken on behalf of Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council), alongside the Broads Authority. Over the period 2017-2036 the GTAA found a need of 73 additional pitches for all households ethnically identified as Gypsies or Travellers, or 41 pitches based only on families who travel for work. The GTAA also found a need for 46 plots for Travelling Showpeople, 63 boat moorings, and 140 pitches for non-Gypsy and Traveller households residing permanently on residential pitches. In relation to transit provision, there is no need for provision for Travelling Showpeople. In relation to boat dwellers, it was recommended that the 24-hour moorings are made available for longer periods of time during out of season periods. With regard to Gypsies and Travellers, it was recommended that each of the 4 authority areas implement a negotiated stopping place policy. The Broads Authority and Great Yarmouth, and North Norfolk are updating their respective GTAAs (due for publication later in 2024).

### Summary

- 2.40 DLUHC <u>'Planning Policy for Traveller Sites'</u> (December 2023) emphasises the need for local authorities to use evidence to plan positively and manage development. The <u>Housing and Planning Act 2016</u> amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.41 The GTAA is based on a methodology which provides first, an accommodation need figure based on ethnic identity; and second, a figure based on the PPTS (December

2023). Local planning policies regarding the provision of new Gypsy, Traveller and Showpeople are outlined in the Joint Local Plan (Part 1). Both study area local authorities have developed criteria to determine suitable locations for new sites and yards.

2.42 Given the cross-boundary characteristic of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAAs produced by neighbouring local authorities. GTAAs recently undertaken by neighbouring local authorities indicate that there remains some Gypsy and Traveller accommodation need throughout the region, but none have suggested a need arising in their area should be met within the study area.

## 3. Trends in population levels

### Introduction

- 3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the DLUHC Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the DLUHC on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation need.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of caravans (tourer and static caravans) and so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches / households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The DLUHC Count includes data concerning Gypsies and Travellers sites<sup>21</sup>. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from January 2020 to July 2023.

<sup>&</sup>lt;sup>21.</sup> Data regarding Travelling Showpeople is published separately by the DLUHC as 'experimental statistics'.

### Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people<sup>22</sup>. There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks and mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DLUHC. Due to Covid-19 restrictions the Count did not take place in July 2020 or January 2021. The July 2023 Count (the most recent figures available) indicate a total of 25,220 caravans. Applying an assumed three person per caravan<sup>23</sup> multiplier would give a population of 75,660 persons.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing<sup>24</sup>, gives a total population of 151,320 persons for England. However, given the limitations of the data this figure can only be very approximate, and may be a significant underestimate.
- 3.9 The 2021 national census included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. Table 3.1 below shows total population and Gypsy and Traveller population per Suffolk local planning authority as derived from the 2021 Census. It shows that in March 2021 there were 903 Gypsies and Travellers residing in Suffolk representing around 0.12% of the usual resident population.<sup>25</sup> This is slightly higher than the average for England & Wales of 0.11%. The proportion of Gypsies and Travellers recorded in the two study area local authorities varied widely with 0.04% of the population in Babergh and 0.09% of the population in Mid Suffolk recorded as Gypsies or Travellers. Ipswich recorded the largest population in Suffolk with 356 Gypsies and Travellers recorded by the 2021 Census.

<sup>&</sup>lt;sup>22</sup> The House of Lords 'Inequalities Faced by Gypsy, Roma and Traveller Communities' (25 February 2020) provides useful links regarding inequalities faced by the GRT community.

<sup>&</sup>lt;sup>23</sup>Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

<sup>&</sup>lt;sup>24</sup> Ibid.

<sup>&</sup>lt;sup>25</sup> See ONS 2021 Census Table KS201EW Ethic Group located at: http://www.ons.gov.uk/

	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Babergh	93,092	40	0.04%
East Suffolk	253,507	146	0.06%
Ipswich	136,797	356	0.26%
Mid Suffolk	104,960	93	0.09%
West Suffolk	181,188	268	0.15%
Total	769,544	903	0.12%

### Table 3.1 Gypsy and Traveller Population (2021)

Source: Census 2021 cited by NOMIS 2023

3.10 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2011 Census data, Table 3.2 shows the housing type of 54 Gypsy and Traveller households. The most common housing type is a semi-detached whole house or bungalow (37%) followed by a detached whole house or bungalow (28%), a caravan or other mobile or temporary structure (15%), a flat, maisonette or apartment (13%), and a terraced whole house or bungalow (7%). This includes households residing both on sites and in bricks and mortar accommodation.

### Table 3.2 Gypsy and Traveller households by tenure

	Babergh		Mid Suffolk		Total	
	No.	%	No.	%	No.	%
A caravan or other mobile or temporary structure	2	9%	6	19%	8	15%
Flat, maisonette or apartment	1	5%	6	19%	7	13%
Whole house or bungalow: Detached	8	36%	7	22%	15	28%
Whole house or bungalow: Semi-detached	9	41%	11	34%	20	37%
Whole house or bungalow: Terraced	2	9%	2	6%	4	7%
Total	22	100%	32	100%	54	100%

Source: Census 2021 cited by NOMIS 2023

3.11 Figure 3.1 below shows that a total of 362 caravans were recorded in Suffolk by the January 2023 Caravan Count. There is some variation in the number of caravans in each local authority with 1 caravan recorded in Babergh, 59 recorded in Ipswich, 82 in West Suffolk, 106 in Mid Suffolk, and 114 in East Suffolk. The 107 caravans recorded in Babergh and Mid Suffolk included 86 caravans on private pitches consisting of 77 with permanent planning permission and 9 with temporary planning permission, and 21 unauthorised caravans on land owned by Gypsies and Travellers.

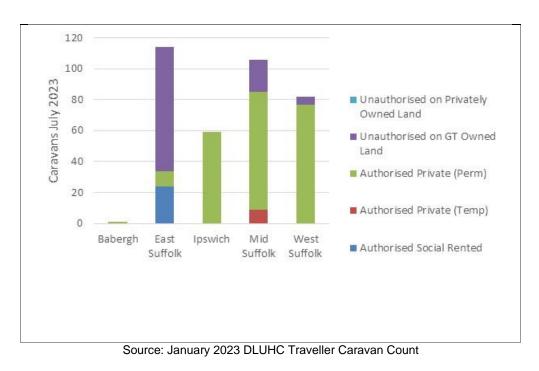
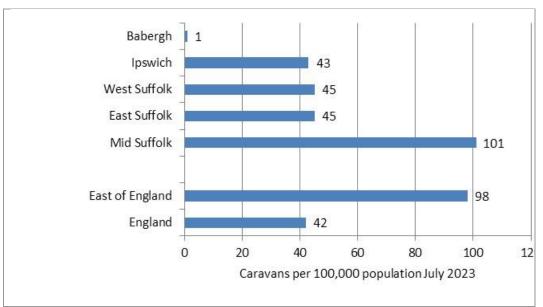


Figure 3.1 Caravans in Babergh July 2023

3.12 Figure 3.2 below shows that when the population is taken into account the density of caravans varies. Babergh recorded 1 caravan per 100,000 population. In contrast, Ipswich recorded 43 caravans per 100,000 population, East Suffolk and West Suffolk 45, and Mid Suffolk 101. This compares to 98 caravans per 100,000 population in relation to the East of England and 42 in relation to England.

Figure 3.2 Pro rata comparison of Caravans per 100,000 population July 2023



Source: July 2023 DLUHC Traveller Caravan Count

- 3.13 Figure 3.3 shows the total number of caravans on authorised pitches in Suffolk over the period January 2020 to July 2023. The number of caravans recorded during the period has varied fairly widely with a maximum of 285 caravans recorded in January 2023 compared to a minimum of 216 caravans recorded in July 2021 (a difference of 69 caravans).
- 3.14 The dotted trend line shows that over the last 3.5 years there has been a slight increase in the number of authorised caravans recorded in the county. On average, two sevenths (29%) of caravans on authorised pitches during the period January 2020 to July 2023 were recorded in both Mid Suffolk and East Suffolk, compared to around a quarter (24%) in Ipswich, and around a sixth (17%) in Mid Suffolk. On average, only 1 caravan (0%) was recorded on authorised sites in Babergh over the same period.

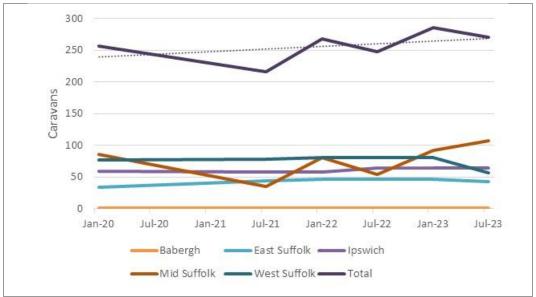


Figure 3.3 Authorised caravans in Suffolk Jan 2020-Jul 2023

Source: July 2023 DLUHC Traveller Caravan Count

### Data on unauthorised sites

- 3.15 The DLUHC Count also records data on unauthorised pitches (i.e. caravans residing temporarily on 'pitches' without planning permission). Figure 3.4 shows the number of caravans recorded by between January 2020 to July 2023 in Suffolk.
- 3.16 The dotted trend line shows a gradual decrease in the number of caravan unauthorised pitches over the period 2020 to July 2023 (although Covid-19 restrictions may have impacted on the number of unauthorised encampments recorded during 2020 and 2021). The number of unauthorised caravans recorded in each year ranged from a maximum of 106 in January 2020 to a minimum of 54 in January 2022.

3.17 On average, almost four fifths (79%) of unauthorised caravans were recorded in East Suffolk compared to around an eighth in Mid Suffolk and a ninth (9%) in West Suffolk. No caravans on unauthorised sites were recorded by the DLUHC Count between January 2020 to July 2023 in Babergh or Ipswich.

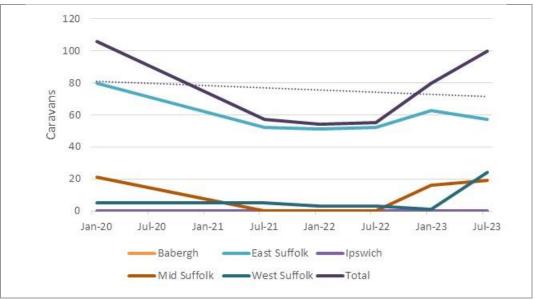


Figure 3.4 Unauthorised caravans in Suffolk Jan 2020-Jul 2023

### Local authority data on unauthorised encampments

- 3.18 Babergh District Council and Mid Suffolk District Council record more detailed data regarding unauthorised encampments. Figure 3.5 shows the number of caravans recorded between 2018 and 2023 in the study area. There was a total of 70 unauthorised encampments recorded during the 5-year period.
- 3.19 There has been a gradual decrease in the number of unauthorised encampments recorded by the two local authorities over the period 2018 and 2023 (although Covid-19 restrictions may have impacted on the number of unauthorised encampments recorded during 2020 and 2021. The number of unauthorised encampments recorded in each year ranged from a maximum of 57 in 2019 to a minimum of 4 in 2023. Half (50% or 35) unauthorised encampments took place in each local authority area. Most (85%) of unauthorised encampments consisted of between 1 and 5 vehicles with only a relatively small proportion (14%) consisting of 6 vehicles or more.

Source: July 2023 DLUHC Traveller Caravan Count

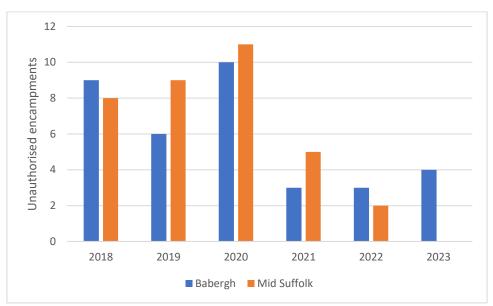


Figure 3.5 Local authority data on unauthorised encampments

Source: Study area local authorities 2023

3.20 Unauthorised encampments tended to occur in areas with open spaces although there were 7 locations where more than 3 or more unauthorised encampments took place (Table 3.4).

	Location (no.)
Chilton Airfield	5
Sudbury Aubrey Drive	5
Wortham Ling	4
Sudbury Health Centre	3
Rickinghall Snape Hill	3
Copdock Park and Ride	3
Claydon Old Norwich Road	3
Other location	44
Total	70

Table 3.4 Location of unauthorised encampments

Source: Study area local authorities 2023

### Gypsy and Traveller pitches within the study area

3.21 As Table 3.5 shows, in October 2023 that there were 2 privately owned pitches in Babergh. In Mid Suffolk there are 47 privately owned authorised pitches, 7 pitches with temporary planning permission, and 6 pitches situated on unauthorised developments i.e. sites without planning permission.

	Private pitches	LA pitches	Temp pitches	UD pitches	Total
Babergh	2	0	0	0	2
Mid Suffolk	47	0	7	6	60
Total	49	0	7	6	62

### Table 3.5 Study area Gypsy and Traveller pitches (October 2023)

Source: Study area local authorities 2023

3.22 There are a further 50 pitches with planning permission, but not currently occupied by Gypsies and Travellers. The supply will increase as any of the 50 pitches with planning permission become occupied by Gypsies and Travellers. An increase in supply will lead to lower accommodation need.

### **Travelling Showpeople**

3.23 Data from planning permissions is also available in the study area showing provision for Travelling Showpeople. The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot. Table 3.6 shows that there are 2 yards in Mid Suffolk consisting of 5 plots.

### Table 3.6 Study Showpeople yards (October 2023)

	Private plots	Temp plots	UD plots	Total
Babergh	0	0	0	0
Mid Suffolk	5	0	0	5
Total	5	0	0	5

### **Boat Dwellers**

3.24 There is one marina in the study area located in Babergh consisting of 235 pontoon berths and 45 swinging moorings. The moorings are licensed to accommodate leisure/touring boat dwellers. However, it is possible that some of those moored are permanent boat dwellers who move off the mooring for an agreed period of time, travel the waterways and then return. There is also an area close to this marina with 21 permanent moorings.

### Summary

3.25 The 2021 Census indicates that there were 133 Gypsies and Travellers residing in Babergh and Mid Suffolk representing about 0.07% of the total population compared to 0.12% in Suffolk and 0.11% in England. The DLUHC January 2023 Count shows there were 107 Gypsy and Traveller caravans located in the study area including 86 caravans on private pitches consisting of 77 with permanent planning permission and

9 with temporary planning permission, and 21 unauthorised caravans on land owned by Gypsies and Travellers.

- 3.26 In relation to density, as part of the DLUHC July 2023 Traveller Caravan Count, Babergh recorded 1 caravan per 100,000 population compared to 101 in Mid Suffolk. In contrast, Ipswich recorded 43 caravans per 100,000 population, and East Suffolk and West Suffolk 45. This compares to 98 caravans per 100,000 population in relation to the East of England and 42 in relation to England.
- 3.27 The total number of caravans on authorised pitches in the study area over the period January 2020 to July 2023 varied widely with a maximum of 108 caravans recorded in January 2023 compared to a minimum of 36 caravans recorded in July 2021 (a difference of 69 caravans).
- 3.28 A total of 70 unauthorised encampments were recorded by the two local authorities between 2018 and 2023. The number of unauthorised encampments recorded in each year ranged from a maximum of 57 in 2019 to a minimum of 4 in 2023. Most (85%) of unauthorised encampments consisted of between 1 and 5 vehicles with only a relatively small proportion (14%) consisting of 6 vehicles or more.
- 3.29 In October 2023 there were 2 privately owned pitches in Babergh. In Mid Suffolk there are 47 privately owned pitches, 7 pitches with temporary planning permission, and 6 pitches situated on unauthorised developments i.e. sites without planning permission. There is also 2 Traveling Showpeople yards in the study area consisting of 5 plots located in Mid Suffolk, and over 280 leisure moorings, and 21 known permanent moorings located in Babergh.

### 4. Stakeholder consultation

### Introduction

- 4.1 Consultations with a range of stakeholders were conducted to provide qualitative information about the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The aim of the consultation was to obtain both an overall perspective on issues facing these groups and an understanding of local issues that are specific to the study area. This was primarily undertaken over the telephone, in the format of a discussion, covering the key themes listed below (paragraph 4.4). This took place between August 2023 and March 2024, with 15 key stakeholders.
- 4.4 In recognition that Gypsy and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers from neighbouring authorities, as well as from within the study area. The neighbouring authorities (see Figure 1.2) including:
  - Braintree (Essex)
  - Breckland (Norfolk)
  - Colchester (Essex)
  - East Suffolk (Suffolk)
  - Essex County Council (Essex)
  - Norfolk County Council (Norfolk)
  - South Norfolk (Norfolk)
  - Suffolk (County Council)
  - Tendring (Essex)
  - West Suffolk (Suffolk)
- 4.5 The departments and agencies include officers with responsibility for Gypsy, Traveller, Travelling Showpeople and boat dwellers from within authorities and other key stakeholders and agencies. Local and national services providing support to the different communities include:
  - Norfolk & Suffolk Gypsy, Roma and Traveller Service
  - National Gypsy and Traveller Association
  - National Association of Gypsy Traveller Liaison Officers
  - Showmen's Guild of Great Britain (regional and national)
  - Association of Circus Proprietors of Great Britain
  - National Bargee Traveller Association (NBTA)
- 4.6 Themes included: existing provisions; main issues facing the different community groups in relation to accommodation, drivers for new accommodation; the need for

additional provisions and facilities; travelling patterns; unauthorised encampments; planning process; communication between service providers; access and use of services (such as health and education); the availability of land; barriers to new provision; accessing services; and work taking place to meet the needs of the different community groups. This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised.

#### Accommodation needs

- 4.7 Stakeholders spoke about the need for more pitches in local areas, the need for expansion of sites, and how families want to stay together. It was also suggested that sites should not be too large due to a risk of conflict. In relation to the ideal size of pitches it was suggested that there is no one agreed size.
- 4.8 A key issue is the growth of family units which is leading to overcrowding and demand for more permanent sites. Stakeholders commented on how accommodation need and demand are different and it can be difficult to differentiate need from demand. Gypsies and Travellers have cultural and nomadic needs which influence the type of sites and accommodation provision required.
- 4.9 It was suggested how the complexity of the travelling community goes beyond ethnicity and travelling patterns. Stakeholders commented on how there are not only cultural differences between Romany Gypsy and Irish Travellers that need to be taken into account when considering accommodation need, but also differences between individual families.
- 4.10 It was noted that although Gypsies and Travellers primarily prefer small family sites, it can be quicker and cheaper for local authorities to provide larger sites. However, larger sites can be more difficult to maintain and can lead to issues around community cohesion. Generally, it was thought that there tends to be less public opposition to the provision of new small sites compared with larger ones. Issues that can arise on larger sites include conflict between families, high turnover, and costs of repairs and maintenance. In the longer run, families moving away from a larger site due to conflict create need for accommodation elsewhere.
- 4.11 Stakeholders agreed that it can be very difficult to measure or estimate the number of Gypsy and Traveller families residing in bricks and mortar accommodation. There is limited awareness of Gypsy and Traveller families in housing and there are clear gaps in information. Families living in bricks and mortar accommodation were likely to constitute 'hidden' demand or need.
- 4.12 It was acknowledged that whilst some families adapted well to living in bricks and mortar accommodation some struggled. In particular, it was suggested that families

with children attending school may resort to hiding their identity in order to avoid bullying and harassment. It was noted that Gypsy and Traveller children living in bricks and mortar accommodation were more likely to attend secondary school compared to those living on sites.

4.13 Gypsy and Traveller families living in bricks and mortar accommodation may not identify themselves as such in order to avoid discrimination when trying to gain employment. However, it was noted that even when living in bricks and mortar accommodation travelling was important for families. Some Gypsies and Travellers may prefer to live on a site but reside in bricks and mortar accommodation to avoid social stigma and to improve the health and education opportunities of children.

#### Transit provision and travelling patterns

- 4.14 The need for the provision of new transit provision was discussed. It was felt that a lack of transit provision can lead to unauthorised encampments. Stakeholders noted that local authorities across Suffolk have been trying to address this collectively, through trying to identify potential transit sites. Transit sites were not regarded as necessary for Travelling Showpeople as they tend to stop on the land where they are providing their event and then either move onto their next event or go back to their own accommodation (yard).
- 4.15 Stakeholders discussed travelling patterns. It was noted that travelling is an integral aspect of the Gypsy and Traveller community, and that families will travel irrespective of whether they live by the roadside, on sites, or in bricks and mortar accommodation. The main reasons for travelling were deemed: to be close to friends and family, for employment reasons, for holidays, and for cultural reasons i.e. to reinforce cultural identity.
- 4.16 It was agreed that it can be difficult to determine travelling routes although there was acknowledgment that these transcend local authority boundaries. Stakeholders noted that some unauthorised encampments consist of families travelling through the area to visit family and friends. However, moving families on from unauthorised encampments usually leads to them setting up another unauthorised encampment from which they are, again, likely to be moved on.
- 4.17 Stakeholders commented on how being a Gypsy and Traveller is being part of a cultural identity and not simply about travelling. This identity influences how they live, interact, their relationships, and how they communicate with one another. Its importance led Gypsies and Travellers to campaign for their ethnic identity to be protected as a human right.

- 4.18 Whilst there is a general objection to unauthorised encampments there is also usually opposition to new transit sites. Stakeholders highlighted the need for new transit and emergency provision. It was suggested that such places could be similar to truck stops. This would enable local authorities and the police to direct Gypsy and Traveller families to the new transit sites which would help reduce unauthorised encampments.
- 4.19 Stakeholders commented on how boat yards and different parts of the waterways have facilities available to people travelling along them. They were not aware of any outstanding need for transit provision, but did comment on a possible need for more residential moorings. They commented on how some of the existing provision is overcrowded, and that more authorised moorings are needed. Some stakeholders suggested that boat yards are the best way to address any outstanding need, as they will be able to offer the necessary amenities and facilities.

#### Barriers to provision

- 4.20 Preconceptions about Gypsies and Travellers were seen to influence attitudes towards the provision of new sites. There was a range of comments regarding relationships between different community groups. The relationship between Travellers and the settled community was described as "more often than not, very fragile and delicate". It was suggested that the Traveller and settled communities need to learn more about one another.
- 4.21 There is perceived to be a lack of understanding by local communities of the Gypsy and Traveller, Travelling Showpeople and boat dweller communities when applying for accommodation provision. Stakeholders reported that there is often pressure for Gypsies and Travellers to occupy an existing site with spaces, however this is often not appropriate due to families not wishing to live with other families due to cultural differences or families preferring to reside only with family members. Stakeholders stated that this was less the case in relation to Travelling Showpeople and boat dwellers.
- 4.22 The media, both nationally and locally, was regarded as playing a negative role in determining attitudes towards Gypsies and Travellers. It was acknowledged that a minority of Gypsy and Traveller families residing on unauthorised encampments who leave a mess do impact negatively on public images of the community. It was stated that articles about such events in the press can also reinforce community tensions. In contrast, more positive stories relating to the Gypsy and Traveller community were considered to be rarely published by local papers. Stakeholders stated that it takes time to build trust with the Gypsy and Traveller community.

#### Cooperation and communication

- 4.23 Stakeholders spoke of how they are currently working towards improving the partnership working between Council departments and other agencies which deal with Gypsy and Traveller issues, which continues to be a work in progress. They commented on how there needs to be better information sharing.
- 4.24 The study area authorities and neighbouring local authorities are continuing to work towards liaising more closely to coordinate responses to the needs of Gypsy and Traveller families. It was suggested that the Norfolk and Suffolk Gypsy, Roma and Traveller Group plays an important role in bringing the key services across Suffolk and Norfolk together. It coordinates and liaises with officers across all the authorities in the two counties. Cross border working is further enhanced through membership of the National Association of Gypsy and Traveller Officers (NAGTO). This provides a more effective and beneficial coordinated and collaborative approach, particularly in relation to the regional dimension to cross-border working on Gypsy and Traveller issues.

#### Summary

- 4.25 The stakeholder consultation offered important insights into the main issues within the study area. It was generally acknowledged that there is a lack of accommodation provision throughout the study area and neighbouring authorities. Much of the accommodation need is due to growing families on existing pitches leading to overcrowding. Stakeholders recognised that cultural identity and lifestyles of different groups such as Gypsies, Travellers, Travelling Showpeople and boat dwellers may impact on the type of accommodation required.
- 4.26 However, larger sites can be more difficult to maintain and can lead to issues around community cohesion. Issues that can arise on larger sites include conflict between families, high turnover of families, and costs of repairs and maintenance. Families moving off a larger site due to conflict creates a need for accommodation elsewhere.
- 4.27 Despite the need for new permanent and transit provision there are a range of barriers to new provision including a lack of suitable land. In response, there needs to be a better understanding between Gypsy and Traveller, and settled, communities. Stakeholders are currently working towards improving partnership working between different departments and organisations although there needs to be better information sharing.

### 5. Gypsies and Travellers consultation

#### Introduction

5.1 This section of the assessment focuses on the consultation with Gypsies and Travellers. It involved questions covering a range of issues related to accommodation and service needs, based on a standard questionnaire. Whilst covering all questions, the method and order of questions varied in order to maximise response rates. Methods ranged from an informal style to a more formal approach which involved asking questions in a specific order.

#### Methodology

- 5.2 The consultation included questions regarding issues such as family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and / or undeveloped pitches, and future plans for pitches), travelling patterns, and accommodation needs.
- 5.3 The response rate for the consultation with households was 84% equating to 47 out of the 56 pitches (consisting of 43 occupied authorised pitches, 7 pitches with temporary planning permission, and 6 pitches on unauthorised developments). However, through a combination of direct and proxy consultation (face-to-face and telephone), it was possible to gather sufficient data representing all 56 occupied pitches.
- 5.4 The data was used to calculate the level of supply, occupancy and need and which of the two needs categories those with need met. Also, general comments in terms of the key issues were also gathered and recorded, in order to gain and present further insight and evidence the need calculations (summarised below).
- 5.5 The number and location of pitches were determined using local authority data. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits, and consultation with households helped to clarify the status of pitches (i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, pitches with planning permission which are planned to be developed or redeveloped, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues). Locations where planning permission has lapsed, refused or withdrawn, or where enforcement action has previously taken place, were also visited to confirm occupancy and use.

- 5.6 Although attempts were made to access Gypsies and Traveller households residing in bricks and mortar accommodation, it was not possible to consult with them. However, an alternative method of determining the accommodation needs of households residing in bricks and mortar accommodation has been applied (see step 15 below). The methods used in attempting to contact households residing in bricks and mortar accommodation households residing in bricks and mortar accommodation households residing in bricks and mortar accommodation has been applied (see step 15 below). The methods used in attempting to contact households residing in bricks and mortar accommodation included:
  - Asking households residing on sites if they were aware of any relatives or friends residing in bricks and mortar accommodation;
  - Contacting key stakeholders to request help to access Gypsies and Travellers living in bricks and mortar; and
  - Seeking information about the location of households residing in bricks and mortar accommodation through the stakeholder consultation

### **Existing Supply**

- 5.7 There are a total of 49 authorised pitches in use by members of the Gypsy and Traveller community within the study area. There are a further 50 pitches with planning permission, but not currently occupied by Gypsies and Travellers. The supply will increase as any of the 50 pitches with planning permission become occupied by Gypsies and Travellers. An increase in supply will lead to lower accommodation need.
- 5.8 Table 5.1 shows the occupied pitches, vacant pitches (current pitches with planning permission but not occupied at the time of the consultation), and potential pitches (pitches with planning permission expected to be developed or redeveloped and occupied within the first five-year period).

	Private	LA	Total
Babergh	2	0	2
Babergh Mid Suffolk	47	0	47
Total	49	0	49

#### Table 5.1 Permanent Gypsy and Traveller pitches per authority

Source: GTAA 2024

5.9 Table 5.2 below lists the number of authorised pitches per authority including vacant and potential pitches.

	Occupied	Vacant	Potential	Total
Babergh	2	0	0	2
Mid Suffolk	40	2	5	47
Total	42	2	5	49
	0 01 1		11 11 0000	

Table	5.2	Occupied,	vacant	and	potential	Gypsy	and	Traveller	pitches
(autho	risec	d supply)							

Source: Study	/ area local	authorities 2023

5.10 Table 5.3 lists the number of pitches per authority with temporary planning permission and those with no planning permission and recorded as unauthorised developments (including unauthorised pitches tolerated by the respective planning authority and those with pending applications or appeals). As can be seen in the needs calculations below (Table 5.3) these pitches contribute towards the additional accommodation needs in the area, due to being in need of permanent planning permission and the occupants having accommodation need.

## Table 5.3 Gypsy and Traveller pitches without permanent permissionper local authority

	Temporary	Unauthorised developments	Total
Babergh	0	0	0
Mid Suffolk	7	6	13
Total	7	6	13
	Sour	ce: GTAA 2024	

5.11 There are a further 50 pitches with planning permission for Gypsy and Travellers. However, the pitches are not currently occupied by Gypsies and Travellers and, as such, are not included in the local authority supply. Only if the pitches are available to be occupied by Gypsy and Traveller households can they be considered to meeting accommodation need. Alternatively, the pitches could be considered to meet Mid Suffolk's residential caravan (rather than Gypsy and Traveller) accommodation need. This may require a change of license conditions.

#### Permanent accommodation need

5.12 Additional accommodation need mainly derives from: households residing on unauthorised pitches or pitches with temporary planning permission requiring permanent permission; households residing on overcrowded authorised pitches; and new family formations expected to arise from within existing family units. Accommodation need for pitches also derives from households residing in bricks and mortar accommodation. Households residing on sites and stakeholders commented on how it is important to determine this component of accommodation need.

#### Requirement for permanent residential pitches 2023-2028

- 5.13 The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.4 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. The following table (Table 5.4) relates to the study area as a whole.
- 5.14 As discussed in Chapter 2, there are differing interpretations of the PPTS (2023) definition. As such, the needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2023 ('PPTS' column).

#### Table 5.4 Estimate of the need for permanent pitches in the study area 2023-28

	Ethnic	PPTS	
1) Current occupied permanent residential site pitches	42	42	
Additional residential supply			
2) Number of unused residential pitches available	2	2	
3) Number of existing pitches expected to become vacant through mortality	1	1	
4) Net number of family units on sites expected to leave the area in next 5 years	2	2	
5) Number of family units on sites expected to move into housing in next 5 years	0	0	
6) Residential pitches planned to be built or to be brought back into use	5	5	
Total Additional Supply	10	10	
Additional residential need			
7) Seeking permanent permission from temporary sites	7	7	
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	2	2	
9) Family units on transit pitches requiring residential pitches in the area	0	0	
10) Family units on unauthorised encampments requiring residential pitches	0	0	
<ul><li>11) Family units on unauthorised developments requiring residential pitches</li><li>12) Family units currently overcrowded (or hidden family members) on pitches</li></ul>	6	6	
seeking residential pitches in the area, excluding those containing emerging family unit in step 8	6	6	
13) Net new family units expected to arrive from elsewhere	2	2	
14) New family formations expected to arise from within existing family units	7	7	
15) Family units in housing but with a psychological aversion to housed	_	0	
accommodation	5	0	
Total Need	35	30	
Balance of Need and Supply			
Total Additional Pitch Requirement	25	20	
Source: GTAA 2024			

#### Source: GTAA 2024

NB: The supply will increase If any of the 50 pitches with planning permission not currently occupied by Gypsy and Traveller households become occupied by Gypsies and Travellers. An increase in supply would lead to lower accommodation need. Alternatively, the 50 pitches could be regarded as residential caravan provision (which can be occupied by both Gypsies and Travellers non-Gypsies and Travellers).

# Requirement for permanent residential pitches 2023-2028: steps of the calculation

- 5.15 Information from local authorities and the census plus evidence from the survey was used to inform the calculations including:
  - The number of Gypsies and Travellers housed in bricks and mortar accommodation
  - The number of existing Gypsy and Traveller pitches
  - The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
  - The number of unauthorised developments (during the survey period)
  - The number of temporary pitches
  - The number of vacant pitches
  - The number of planned or potential new pitches
  - The number of transit pitches
- 5.16 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations.

#### Supply of pitches 2023-2028

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

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

5.17 Based on information provided by the councils and corroborated by site visits and household surveys, there are currently 42 occupied authorised Gypsy and Traveller pitches in the study area.

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

5.18 This relates to those pitches that have planning permission, are developed but not currently in use. There are currently 2 vacant pitches within the study area.

#### Step 3: Number of existing pitches expected to become vacant 2023-2028

5.19 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.<sup>26</sup> This results in the supply of 1 pitch.

## Step 4: Number of family units in site accommodation expressing a desire to leave the study area and resulting in the creation of a vacant pitch

5.20 Two households surveyed as part of the GTAA stated that they intend to leave the study area in the next 5 years. As there is no data regarding households who would like to in migrate from outside the study area, both in- and out-migration are determined as 2.

### Step 5: Number of family units on permanent pitch site accommodation expressing a desire to reside in housing and resulting in the creation of a vacant pitch

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

#### Step 6: Residential pitches planned to be built or brought back into use, 2023-2028

5.22 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches include those which have been partly developed or which were previously occupied but are currently not occupied and in need of redevelopment. There are 7 pitches in the study area that are expected to be built or brought back into use during the period 2023-2028.

#### Need for pitches 2023-2028

5.23 As discussed in Chapter 2, this needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2015 ('PPTS' column).

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

5.24 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2023-2028 will still require accommodation within the study area. There are currently 7 pitches with temporary planning permission located in the study area. This generates a total need in the study area of 7 pitches ('ethnic'), and 7 pitches ('PPTS').

<sup>&</sup>lt;sup>26</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987.

# Step 8: Family units on pitches seeking residential pitches in the study area 2023-2028 and not leading to making a pitch vacant and available for others to occupy

- 5.25 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.
- 5.26 This category of accommodation need overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need in the study area of 0 pitches ('ethnic'), and 0 pitches ('PPTS').

### Step 9: Family units on transit pitches seeking residential pitches in the study area 2023-2028

5.27 This is determined by survey data. This generates a total need in the study area of 0 pitches ('ethnic'), and 0 pitches ('PPTS').

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

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

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

5.29 This was determined by consultation data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. This generates a total need in the study area of 6 pitches ('ethnic'), and 6 pitches ('PPTS').

# Step 12: Family units on overcrowded pitches seeking residential pitches in the area and not leading to making a pitch vacant and available for others to occupy

5.30 This was determined by the consultation. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed

that once the extra family unit leaves (included in the need figures in step 14) their accommodation will no longer be overcrowded. The calculations suggest that the need for additional pitches in the study area to resolve overcrowding over the period 2023-2028 are as follows: 6 pitches ('ethnic definition'), and 6 pitches ('PPTS' definition).

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

5.31 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. This amounts to a net inflow of 2 households into the study area.

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

5.32 The number of individuals needing to leave pitches to create new family units within the period 2023-2028 was estimated from consultation and excludes those included in steps 8, 12 and 13. This will result in the formation of 7 new households requiring residential pitches over the period 2023-2028 ('ethnic definition'), and 7 pitches ('PPTS' definition).

#### Step 15: Households in bricks and mortar with need for a pitch

- 5.33 This is based on households who live in bricks and mortar accommodation, but need to move to a pitch based on cultural preference. This was determined firstly by the number of Gypsy and Traveller households residing in bricks and mortar accommodation was determined using 2021 Census data which records how many Gypsies and Travellers living in the district and by type of accommodation. The number of those living in a caravan (as recorded by the census) was removed from the total to give the number living in bricks and mortar. According to 2021 Census data, an estimated 46 households live in bricks and mortar accommodation in the study area. Applying a 10% ratio (based on RRR Consultancy expertise) the cultural preference to reside on a pitch results in a need for 5 additional pitches.
- 5.34 As the travelling status of households residing in bricks and mortar accommodation is not known, the accommodation needs arising from these households are only included in the 'ethnic' needs figures. This results in a need of 5 additional pitches in relation to the 'ethnic' definition and 0 pitches in relation to the PPTS definition.

#### Balance of Need and Supply

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

#### Table 5.5: Summary of Gypsy and Traveller pitch needs 2023-28

	Ethnic	PPTS	
Supply	10	10	
Need	35	30	
Difference	25	20	

Source: GTAA 2024

#### Requirement for permanent residential pitches 2028-2037

- 5.36 Considering future accommodation need it is assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.5 below. Please note that the 2023 base figures include both authorised occupied and vacant pitches, whilst the 2028 base figures assume that any potential pitches have already been developed.
- 5.37 2028 pitch base figures are determined by a number of factors including:
  - the number of occupied pitches in 2023 (as determined by the household survey)
  - the number of vacant pitches in 2023 (as determined by the household survey)
  - the number of potential pitches (as determined by local authority data)
  - accommodation need for the period 2023-2028 (as determined by the GTAA).
- 5.38 It is assumed that by 2028 vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply.
- 5.39 In relation to this accommodation assessment, analysis of the current population indicates an annual household growth rate of 2.29% per annum (compound) equating to a 5-year rate of 12.0%. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. A mortality rate of 2.825% applied over the 5-year period leads to a net population growth rate of 9.175%. It is assumed that the

population growth rate is likely to continue during the 5-year periods between 2028 and 2037.

## Table 5.6: Estimate of the need for permanent Gypsy and Traveller pitches2028-2033

	Ethnic	PPTS
1) Estimated pitches occupied by Gypsies and Travellers	74	69
Supply of pitches		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality	2	2
Total Additional Supply	2	2
Need for pitches		
4) Household units moving into the study area (100% of outflow)	0	0
5) Newly forming household units	8	8
Total Need	8	8
Balance of Need and Supply		
Total additional pitch need	6	6
Source: GTAA 2024		

# Table 5.7: Estimate of the need for permanent Gypsy and Traveller pitches2033-2037

	Ethnic	PPTS
1) Estimated pitches occupied by Gypsies and Travellers	80	75
Supply of pitches		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality	2	2
Total Additional Supply	2	2
Need for pitches		
4) Household units moving into the study area (100% of outflow)	0	0
5) Newly forming household units	9	8
Total Need	9	8
Balance of Need and Supply		
Total additional pitch need	7	6
Source: GTAA 2024		

5.40 Table 5.6 shows the accommodation needs for the study area for the periods 2028-2033, and 2033-37.

#### Table 5.8: Summary of accommodation needs 2028-37 (pitches)

Period	Ethnic definition	PPTS 2023 definition
2028-33	6	6
2033-37	7	6
Total	13	12

Source: GTAA 2024

#### Requirements for transit pitches / negotiated stopping arrangements

- 5.41 This assessment recommends that the study area local authorities adopt a negotiated stopping policy (see Appendix 1 for an example negotiated stopping place protocol). This involves households in residing in caravans being able to stop at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that all local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or on a countywide basis.
- 5.42 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or the local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).
- 5.43 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved onto an alternative location that is more suitable. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities.
- 5.44 The characteristics of negotiated stopping places means that there is no inherent cost of purchasing land or the requirement for the local authority to gain planning permission. It is simply an agreement for transiting households to use appropriate land for an agreed period of time and provision of e.g. wheelie bins or skips, and if possible, porta loos and porta showers.
- 5.45 Also, local authorities should consider allowing visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time. This will allow households to temporarily accommodate family and friends without fearing that their licence will be at risk due to having too many caravans on site.

#### Summary

5.46 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. It has determined accommodation needs resulting from the calculations in the tables above for the study area, followed by need per district:

#### Table 5.7: Gypsy and Traveller permanent accommodation need (summary)

#### Study area

Period	Ethnic definition	PPTS 2023 definition
2023-28	25	20
2028-33	6	6
2033-37	7	6
Total	38	32
	Source: GTAA	2024

Source: GTAA 2024

#### Babergh

Period	Ethnic definition	PPTS 2023 definition
2023-28	3	1
2028-33	0	0
2033-37	1	1
Total	4	2

Source: GTAA 2024

#### Mid Suffolk

Period	Ethnic definition	PPTS 2023 definition
2023-28	22	19
2028-33	6	6
2033-37	6	5
Total	34	30
	O O T A A	0004

Source: GTAA 2024

### 6. Showpeople consultation

#### Introduction

6.1 As described in Chapter 1, this GTAA considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. Nonetheless, government guidance (DCLG 'Planning Policy for Traveller Sites' December 2023) indicates that local authorities should consider the accommodation needs of Travelling Showpeople families. As such, they have been included in this report.

### Methodology

- 6.2 The method adopted, as outlined in previous chapters, is based on a combination of secondary data, local authority data on number of authorised and unauthorised plots and yards, confirmation numbers of plots and yards through consulting with households and community representatives (primarily Showmen's Guild of Great Britain and the Association of Circus Proprietors of Great Britain) and consultation with households and the community representatives. The consultation has taken into account all known Travelling Showpeople households residing in the study area on authorised and unauthorised plots<sup>27</sup>, with the accommodation needs of all (100%)known plots being considered by the assessment.
- 6.3 The consultation with the community representatives and the households included questions regarding issues such as: family composition (per plot), occupancy of existing plots (including number of and reasons for vacant and /or undeveloped plots and future plans for plots), management and suitability of current yards and plots (including facilities and services), travelling patterns, health, education and employment, and accommodation needs.

### **Existing Supply**

6.4 Table 6.1 below lists the number of authorised plots, and unauthorised developments (UD) (plots), and vards and plots with temporary planning permission per local authority within the study area (primarily based on data provided by the local authorities).

		<b>P</b> • • <b>P</b> • • <b>J</b>			autionity
	TS Yards	TS Plots	UD yards	UD plots	Transit plots
Babergh	0	0	0	0	0
Mid Suffolk	2	5	0	0	0
Total	2	5	0	0	0

### Table 6.1 Showpeople vards and plots per authority

Source: Study area local authorities 2023

<sup>&</sup>lt;sup>27</sup> Please see the Glossary for definitions of Travelling Showpeople yards and plots.

6.5 Consultation is based on all (100%) known plots. The consultation included questions regarding issues such as: family composition (per plot), occupancy of existing plots (including number of and reasons for vacant and /or undeveloped plots and future plans for plots), management and suitability of current yards and plots (including facilities and services), space, travel, work and accommodation needs.

#### **Calculation of Permanent Accommodation Need**

6.6 The need for permanent plots for Showpeople in the study area is based on the model suggested in DCLG (2007) guidance and supplemented by data provided by the local authorities. It provides calculation of accommodation need for the period of 2023-2037 in 5-year periods.

#### Requirement for permanent plots 2023-2028

6.7 The need for plots in the area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 6.2 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

#### Table 6.2: Estimate of the need for permanent residential plots 2023-2028

1) Current occupied permanent residential site plots	5
Current residential supply	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality	0
4) Net number of households on sites expected to leave the area in next 5 years	0
5) Number of households on sites expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use	0
Total Supply	0
Current residential need: Plots	
7) Seeking permanent permission from temporary plots	0
8) Households (on plots) seeking residential plots in the area, excluding those counted as moving	0
due to overcrowding in step 12	0
9) Households on transit plots requiring residential plots in the area	0
10) Households on unauthorised encampments requiring residential plots in the area	0
11) Households on unauthorised developments requiring residential plots in the area	0
12) Households currently overcrowded (or hidden family members) on plots seeking residential plots in the area, excluding those containing an emerging household in step 8	3
13) Net new households expected to arrive from elsewhere	0
14) New household formations expected to arise from within existing households on sites	4
Total Need	7
Balance of Need and Supply	
Total additional plot need	7
Source: GTAA 2024	

#### Requirement for permanent plots 2023-2028: steps of the calculation

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

- The number of existing plots
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary plots
- The number of vacant plots
- The number of planned or potential new plots
- The number of transit plots
- 6.9 The remainder of this chapter describes both the process and results of the Travelling Showpeople's needs calculations.

#### Supply of permanent plots 2023-2028

#### Step 1: Current occupied permanent plots

6.10 Based on information provided by the study area local authorities and corroborated by information from the consultation. There are currently 5 occupied plots.

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

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

#### Step 3: Number of existing plots expected to become vacant 2023-2028

6.12 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. It then calculates the number of plots that would become vacant as a result of mortality. This results in 0 additional plots.

# Step 4: Number of households in plot accommodation expressing a desire to leave the study area and resulting in the creation of a vacant plot

6.13 This was determined by survey data. It was assumed, that those currently residing on plots expecting to leave the area permanently in the next five years – out of choice (step 4) or due to overcrowding (step 12) - would generally be able to do so. This resulted in the supply of 0 plots.

# Step 5: Number of family units on permanent plot accommodation expressing a desire to reside in housing and resulting in the creation of a vacant plot

- 6.14 This was determined by survey data. It was assumed that all those currently residing on plots planning to move into housing in the next five years (step 5) or preferring to move into housing from an overcrowded plot (step 12), would be able to do so.
- 6.15 As with step 5, a supply of 0 plots in the study area were expected from this source, excluding those moving out of the study area, since these are already counted in step 4.

#### Step 6: Residential plots planned to be built or brought back into use, 2023-2028

6.16 This can include plots which have been partly developed or which were previously occupied but are now vacant and in need of redevelopment. There are 0 plots in the study area that are expected to be built or brought back into use during the period 2023-2028.

#### Need for permanent plots 2023-2028

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

6.17 This is determined by local authority data. It is assumed families residing on plots whose planning permission expires within the period 2023-2028 will still require accommodation within the study area. There are currently 0 plots with temporary planning permission located in the area.

## Step 8: Households on plots seeking residential plots in the study area 2023-2028 and not resulting in the creation of a vacant plot

- 6.18 This was determined by survey data. These households reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised plot, or that they were currently seeking accommodation.
- 6.19 This category of need overlaps with those moving due to overcrowding, counted in step 12. In order to avoid double-counting households which both are overcrowded and seeking accommodation are counted only once. This generates a total need of 0 plots in the study area.

#### Step 9: Households on transit plots seeking residential plots in the study area

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

# Step 10: Households on unauthorised encampments seeking residential plots in the study area

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

## Step 11: Households on unauthorised developments seeking residential plots in the study area

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

# Step 12: Households on overcrowded plots seeking residential plots in the study area and not resulting in the creation of a vacant plot

6.23 Overcrowding on a Travelling Showpeople plot may differ to that on Gypsy and Traveller pitch due to the larger need for equipment and vehicle storage. Showpeople require more space for their equipment and vehicles as well as enough space for

accommodation such as caravans (static and tourers). This generates a total need of 3 plots in the study area.

#### Step 13: New households expected to arrive from elsewhere

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

#### Step 14: New family formations expected to arise from within existing households

6.25 This generates a total need of 4 plots in the study area.

#### Balance of Need and Supply

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

#### Table 6.3: Summary of permanent Travelling Showpeople plot needs 2023-2028

	Plots	
Supply	0	
Need	7	
Difference	7	
	Source: GTAA 2024	

Source: GTAA 2024

#### Requirement for permanent residential plots 2028-2037

- 6.27 Considering future accommodation need, it assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto yards within a 5-year period. As such, only natural population increase (same as step 14 above), mortality, and movement in and out of the study area need to be considered. The base figures regarding the number of plots on yards at the end of the first 5-year period are shown in Table 6.4 below. Please note that the 2023 base figures include both authorised occupied and vacant plots, whilst the 2028 base figures assume that any potential plots have been developed.
- 6.28 2028 pitch base figures are determined by a number of factors including:
  - the number of occupied plots in 2023
  - the number of vacant plots in 2023
  - the number of potential plots
  - accommodation need for the period 2023-2028
- 6.29 It is assumed that by 2028 vacant plots will be occupied, potential plots will have been developed and occupied, and any additional need has been met by new supply. The new supply for 2028 (base) will be 12 plots.

6.30 In relation to this accommodation assessment, analysis of the current population indicates an annual household growth rate of 2.29% per annum (compound) equating to a 5-year rate of 12%. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. A mortality rate of 2.825% applied over the 5-year period leads to a net population growth rate of 9.175%. It is assumed that the population growth rate is likely to continue during the 5-year periods between 2033-2037.

### Table 6.4: Estimate of the need for permanent Travelling Showpeople plots2028-2033

1) Estimated plots occupied by Travelling Showpeople	12	
Supply of plots		
2) Number of unused residential plots available	0	
3) Number of existing plots expected to become vacant through mortality Total Additional Supply	0	
Need for plots		
4) Household units moving into the study area (100% of outflow)	0	
5) Newly forming household units	1	
Total Need	1	
Balance of Need and Supply		
Total additional plots needed		

Source: GTAA 2024

### Table 6.5: Estimate of the need for permanent Travelling Showpeople plots2033-2037

1) Estimated plots occupied by Travelling Showpeople	13	
Supply of plots		
2) Number of unused residential plots available	0	
3) Number of existing plots expected to become vacant through mortality	0	
Total Additional Supply		
Need for plots		
4) Household units moving into the study area (100% of outflow)	0	
5) Newly forming household units		
Total Need	2	
Balance of Need and Supply		
Total additional plots needed		
Source: GTAA 2024		

6.31 Table 6.6 shows the accommodation needs for Mid Suffolk for the periods 2028-2033 and 2033-37.

#### Table 6.6: Summary of permanent accommodation needs 2028-2037 (plots)

Period	Plots	
2028-33	1	
2033-37	2	
Total	3	

Source: GTAA 2024

### Summary

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

#### Table 6.4: Summary of permanent accommodation needs 2023-2037 (plots)

Total	10	
Tatal	10	
2033-37	2	
2028-33	1	
2023-28	7	
Period	Plots	

Source: GTAA 2024

### 7. Boat Dwellers Consultation

#### Introduction

7.1 As described in Chapter 1, this GTAA considers the accommodation needs of boat dwellers. Unlike Gypsies and Travellers, boat dwellers are not considered to be an ethnic minority and, as such, are not protected by the <u>Equality Act 2010</u>. Nonetheless, government guidance (DCLG 2016) indicates that local authorities should consider the accommodation needs of boat dweller.

#### Methodology

- 7.2 Given that the requirement to determine the accommodation needs of boat dwellers was only recently introduced by the DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016), there is no established method to determine need. As such, the need for residential moorings in the study area is assessed according to DCLG (2007) guidance and supplemented by data provided by the local authorities and consultation with stakeholders (in particular the boat dwellers). It is also in accordance with NBTA guidance. This methodology has previously been used by *RRR Consultancy* to undertake Boat Dweller Accommodation Assessments (BDAAs) on behalf of Oxford City Council (2018), Wokingham Borough Council (2019), Broads Authority (2023), Milton Keynes (2024), and for other authorities as part of their GTAAs.
- 7.3 The extent of boat dweller supply and needs was determined by consulting with boat dwellers, boat yard and marina owners and managers and the National Bargee Travellers Association (NBTA). It is also based on an analysis of secondary data including an assessment of online data regarding marinas, yards and the waterways in the study area.

#### Permanent accommodation needs

- 7.4 Whilst many boat dwellers permanently reside on boats due to a desire to live an alternative lifestyle, some do so due to a lack of affordable accommodation. The cost of buying or renting housing in the study area was regarded by stakeholders as leading to boat dwelling as an affordable alternative. However, potential mooring locations are restricted by land ownership and or not suitable for new moorings.
- 7.5 It is recommended that study area local authorities work closely with organisations such as the National Bargee Traveller Association (NBTA), and existing marinas to address accommodation need.

#### Requirement for permanent residential moorings 2023-2028

- 7.6 There are two main marinas and mooring area across the Babergh area including leisure, temporary and permanent mooring areas. There is one area with 21 permanent residential moorings in Babergh. None of the other marinas in the study area are licensed to accommodate permanent residential boat dwellers 12 months of the year.
- 7.7 Beyond the known 21 permanent moorings in Babergh, it is not possible to confirm the actual number of permanent residential boat dwellers in the study area as a whole. There is no current council data confirming the number. However, from consultation and data collection and analysis of secondary data, there is anecdotal evidence that there are around 10 boat dwellers in need of permanently residential moorings in the study area. It is estimated that there is a need of 12 permanent residential moorings across the study area over the local plan period. This takes into account current potential need and need resulting from future need (including population growth) over the duration of the local plan.

Table 7.1: Boat Dweller permanent accommodation need
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Period	Study area
2023-28	10
2028-33	1
2033-37	1
Total	12
	Source: GTAA 2024

#### Requirements for transit moorings: 2023-2037

7.8 It is evident that in addition to the need for additional permanent residential moorings in the area, there is also evidence of need for more transit moorings. There is not necessarily need for more provision, but there is need to be more flexible lengths of time boat dwellers can stay and as with Gypsies and Travellers, the adoption of negotiated stopping policy would also be effective with addressing transit mooring needs of boat dwellers.

#### Summary

- 7.9 It is estimated that there are around 10 boat dwellers residing on their boats in the study area without an authorised permanent mooring for the first five year period and a total of 12 permanent residential moorings across the local plan period.
- 7.10 It is recommended that the local authorities liaise with marine and boat yard owners, and agencies such as the NBTA, to help determine how boat dweller accommodation needs can be met. It is also recommended that the accommodation need is shared by the study area local authorities which contain navigable waterways.

### 8. Conclusion and Recommendations

#### Introduction

- 8.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new provision, facilities, and recording and monitoring processes.
- 8.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the additional accommodation needs. As previously discussed, this report focusses on the assessment of accommodation need for Gypsies and Travellers, Travelling Showpeople, and boat dwellers.
- 8.3 The accommodation needs calculations undertaken as part of this GTAA were based on analysis of both secondary data and primary consultation with Gypsies and Travellers, Showpeople and key stakeholders and site owners and managers.

#### Permanent accommodation needs

8.4 The following outlines the permanent accommodation need over the period of 2023 to 2037:

#### Table 8.1: Gypsy and Traveller permanent accommodation needs

#### Study area

Period	Ethnic definition	PPTS 2023 definition
2023-28	25	20
2028-33	6	6
2033-37	7	6
Total	38	32
	Source: GTAA	2024

#### Babergh

Ethnic definition	PPTS 2023 definition
3	1
0	0
1	1
4	2
	Ethnic definition 3 0 1 4

Source: GTAA 2024

#### Mid Suffolk

Period	Ethnic definition	PPTS 2023 definition
2023-28	22	19
2028-33	6	6
2033-37	6	5
Total	34	30

Source: GTAA 2024

8.5 As discussed in chapters 3 and 5, there are 50 pitches with planning permission, but not currently counted in the supply figures as they are not currently occupied by Gypsies and Travellers. The supply will increase as any of the 50 pitches with planning permission become occupied by Gypsies and Travellers. An increase in supply will lead to lower accommodation need.

#### Table 8.2: Travelling Showpeople permanent accommodation needs

Total	10
2033-37	2
2028-33	1
2023-28	7
Period	Mid Suffolk

Source: GTAA 2024

#### Table 8.3: Boat Dweller accommodation needs

Period	Babergh
2023-28	10
2028-33	1
2033-37	1
Total	12
0	

Source: GTAA 2024

#### The location of new permanent provision

- 8.6 There is general consensus that smaller sites, yards and moorings are preferred by Gypsy, Traveller, Showpeople and boat dweller communities due to better management and maintenance of provision and security. Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities alongside discussions with different community groups, to ensure that any additional need that may arise is identified.
- 8.7 Ensuring that new provisions are located in a safe environment is important although the impact of land costs on determining feasibility must also be considered. The settled community neighbouring sites, yards, or moorings should also be involved in consultations. In relation to Showpeople, the accommodation need on one yard could be met by the family purchasing adjoining land to develop additional plots. With regards to boat dwellers, there is potential for increasing the provisions of permanent residential moorings on existing yards and marinas. It is important for the study area

local authorities to work closely with NBTA to assist them with the development of new moorings.

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

Costs

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

#### Social

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

#### Availability

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

#### Deliverability

- Does the proposed location meet existing general planning policy in terms of residential use, (for example in relation to Green Belt, flooding and the historic environment)?
- Can the owner sell the land easily and quickly?
- Can utilities connect to the proposed provision?
- Can highways connect to the proposed provision?
- 8.9 Considering the evidence gathered throughout the GTAA, it is likely that the key factors determining new provision are:
  - The affordability of land suitable for the development of new sites and the cost of development
  - The need to ensure that new provisions are within accessible travelling distance of social, welfare and cultural services

- The need to carefully consider the proximity of new provisions to existing provisions i.e. whether social tensions might arise if new provisions are located too close to existing provisions
- The sustainability of new provisions i.e. ensuring that they do not detrimentally impact on the local environment and do not place undue pressure on the local infrastructure.
- 8.10 It is apparent from discussions with Gypsy, Traveller households undertaken as part of the household surveys that most households would prefer any new provision built to accommodate existing family members to be situated close to existing provision. However, households were less likely to state preferred locations for any new provision within the study area. Also, whilst households prefer easy access to main roads in order to facilitate travelling, new sites should not be situated too close to main arterial routes as to cause environmental issues such as noise pollution or poor air quality.
- 8.11 It is important that new provisions are accessible to amenities such as shops, schools and health facilities or where there are good transport links or within reasonable distance for households to access the necessary facilities and amenities. DCLG (2015) guidance suggests that local planning authorities should strictly limit new Gypsy and Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure. As stated in Chapter 2, the study area local authority Local Plan policies contain locational criteria to help determine suitable locations for the development of new sites or yards.
- 8.12 The DCLG (2015) guidance states that when considering applications, local planning authorities should attach weight to the following matters:
  - a. effective use of previously developed (brownfield), untidy or derelict land
  - b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
  - c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
  - d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

#### The size of new provision

8.13 Given that there can be management and maintenance issues regarding large sites, it is recommended that any future site and/or extension to existing sites does not Page 64 exceed 20 pitches. DCLG (2008)<sup>28</sup> guidance states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.

- 8.14 Based on DCLG guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500 square metres (0.05ha) would comfortably accommodate the following on-pitch facilities:
  - Hard standing for a touring caravan (enabling households to travel)
  - Hard standing for a static caravan (including double static trailers)
  - 2 car parking spaces
  - 1 amenity block
  - Hard standing for storage shed and drying
  - Garden/amenity area.
- 8.15 If granting permission on an open plan basis, permission should be given on a pitchby-pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, 2 touring caravans and 1 – 2 static caravans along with 4 parking spaces, 2 blocks etc., could be counted as 2 pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

#### Showpeople plots

8.16 In relation to Showpeople, size of new plots need to not only accommodate providing for living space (similar to above), but also space for work equipment. The new plots need to accommodate structures and / or caravans designed for living quarters sufficient to accommodate the household and meet their specific requirements, and space away from the living quarters for storage and maintenance of work equipment and vehicles and domestic vehicles i.e. family car(s). Due to the need for both accommodation space and space for storage and maintenance of very large equipment, the size and space required for a Showpeople plot needs to much larger than a standard Gypsy and Traveller pitch.

<sup>&</sup>lt;sup>28</sup> Please note that this publication was withdrawn in September 2015.

#### **Transit provision**

- 8.17 Analysis of data discussed in Chapter 3 showed that a total of 70 unauthorised encampments were recorded by the two local authorities between 2018 and 2023. The number of unauthorised encampments recorded in each year ranged from a maximum of 57 in 2019 to a minimum of 4 in 2023. Most (85%) of unauthorised encampments consisted of between 1 and 5 vehicles with only a relatively small proportion (14%) consisting of 6 vehicles or more.
- 8.18 It is recommended that the local authorities set up a negotiated stopping places policy. This is land temporarily used as authorised short-term (less than 28 days) stopping places. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the agreed location for a few days. Amenities such as portaloos and showers (or access to alternative nearby facilities) and skips or wheelie bins should ideally be made available for the duration of the agreed period.
- 8.19 According to research undertaken on behalf of the Greater London Authority (GLA) (2019), negotiated stopping is a balanced and humane approach to managing roadside camps. It is based on a mutual agreement between the local authority and Gypsy and Traveller families on matters such as waste disposal and basic temporary facilities. This can sometimes involve directing Gypsy and Traveller households away from contentious public spaces to more appropriate council land. The approach is proven to achieve significant savings in public spending and decreased social costs for Gypsy and Traveller communities.
- 8.20 The GLA (2019) report cites a number of good practice examples including Hackney. The local authority has worked closely with the Gypsy and Traveller community and involved them in dialogue and negotiation. This has resulted in a consistent practice over many years of allowing stopping time and making provision of basic facilities. There have been many locations in the borough that were common stopping places, some used for short periods of time for families passing through or visiting relatives, others used for months and even a couple of years. The practice was also formalised to an extent through leniency agreements which specified arrangements between the local authority and the Traveller families – this is also incorporated in the council's unauthorised encampment protocol.
- 8.21 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. It was first developed by Leeds Gypsy and Traveller Exchange (GATE) and involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to more suitable land (please see Appendix for an example negotiated stopping place protocol).

- 8.22 Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).
- 8.23 The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but may include Travellers agreeing to leave sites clean and not make too much noise with the local authority providing waste disposal and toilets, sometimes showers and water too. However, as Leeds GATE state, negotiated stopping is a locally agreed solution so may differ in different locations. For Negotiated Stopping to work it has to involve local authorities negotiating with roadside Travellers. It will involve talking to and consulting roadside Travellers and working out solutions.
- 8.24 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.
- 8.25 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community and allow households with stopover requirement to stay for an agreed period of time.

#### Summary

- 8.26 The results from this assessment supersede any previous GTAA (including any accommodation need calculated prior to this assessment) for the local planning authorities. This assessment identifies that there is an overall accommodation need in the study area for the local plan period for 38 additional pitches (ethnic definition), and 32 pitches (PPTS 2023).
- 8.27 There is also a need for 10 additional Travelling Showpeople plots during the same period. It is recommended that the local planning authorities work with NBTA to address the identified need of 12 residential boat moorings. It is recommended that the authorities incorporate a policy to address negotiated stopping places for transient and / or visiting Gypsy and Traveller encampments.

- 8.28 It is recommended that the local planning authorities determine which of the accommodation needs figures in relation to Gypsies and Travellers they choose to prioritise in their Local Plans.
- 8.29 This GTAA recommends adopting the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed.
- 8.30 Alternatively, the local authorities may adopt the 'PPTS 2023 definition accommodation needs figures with the difference between the PPTS 2023 figures and Ethnic' definition being an additional need that the council(s) may choose to meet. This means that the local authorities would first meet the need of 32 (20 within the first 5 years) as the obligation but accept the need of a further 6 (5 within the first 5 years) as potential need if further applications are brought forward through windfalls. It is recommended that the work interpretation of need should simply be used as a form of reference and comparison with other authorities who use this approach.
- 8.31 It is also recommended that the local planning authorities consider the accommodation needs that might materialise over the plan period from households (Gypsies, Travellers, Travelling Showpeople and boat dwellers) not considered by this assessment. This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified below and could be met through windfall applications.
- 8.32 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:
  - In relation to Gypsies and Travellers and Travelling Showpeople it is recommended that the local authorities work closely with the families to determine how their accommodation need can best be met.
  - Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
  - In order to meet the accommodation needs of Showpeople, it is also recommended that the local authorities work closely with yard owners to

determine how the proposed land that they have already identified, and other potential land could meet their current and future accommodation needs.

- It is recommended that the local authorities review the planning of unauthorised developments and consider granting permanent status.
- 8.33 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

#### Planning policy:

- To identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites, yards or moorings.
- To consider alternative options for developing new sites, yards and moorings such as developing them on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller, Showpeople and boat dweller communities.
- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups, and NBTA), to review its current, historic and potential planning status, and review the most effective way forward.
- To consider safeguarding Gypsy and Traveller site and Travelling Showpeople yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- To review the planning and license status of sites not occupied by Gypsies and Travellers and determine if it is better to change their status to residential or reuse them for Gypsies and Travellers. Implement a corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To work closely with NBTA to meet the needs of the boat dwellers and constant cruisers across the study area.
- To liaise with marinas and boat yards in the area to see which could accommodate more permanent residential moorings (including converting some of their leisure moorings to permanent).

• The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

#### Management:

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies, Travellers, Showpeople and boat dwellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the <u>Equality Act 2010</u>.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies in relation to Gypsy, Traveller, Showpeople and boat dweller communities.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change. As such, their accommodation needs should be reviewed every 5 to 7 years.

### Appendix 1: Example negotiated stopping place protocol

This agreement is between [Local Authority] and [named head of family]

This agreement relates to the time limited toleration of your encampment on [Local Authority] owned land adjacent to xxxx. The land is shown on the appending map.

The Council is currently willing to tolerate your encampment on the site for a short period of time until xxxx. The Council recognises its legal obligations to carry out needs assessment prior to initiating legal action to recover possession of land.

[Local Authority] reserves the right to terminate this agreement, and to seek to recover possession of the land through court proceedings, at an earlier date if the terms set out below in this agreement are breached.

I ....., and my family agree to adhere to the following terms:

1. You will be asked to park your caravan and vehicles in a designated place on the site. This is to prevent further caravans joining the encampment. Your family must stay within the boundaries of the site.

2. You will be issued with a toilet. This is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.

3. You will be issued with a bin for all your domestic waste. You are responsible for keeping the area around your caravan clean and tidy. The bin is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.

4. All dogs must be kept under control and tied up. Dogs must be tied up on a lead or in a kennel during the night or when you leave the site for any period of time. The dog wardens will visit this site if loose dogs are reported.

5. No fires larger than a small cooking fire are to be lit, absolutely no burning of commercial or domestic waste is allowed.

6. The nearest Household Waste for larger items is at ...... Trade waste can be disposed at .....

7. Environmental enforcement officers will monitor the site and take action against any activity likely to cause environmental harm, inconvenience or distress to surrounding occupants such as fly-tipping, excessive noise or use of quad bikes.

8. Give consideration to other people within the local vicinity in terms of noise nuisance and the parking of vehicles.

9. Not to engage in any anti-social behaviour, disorder or fly tipping on or near this site. Horses will not be tolerated on the site and the presence of horses may be regarded as 'anti social behaviour' for the purposes of this agreement. Any traps owned by families are not to be used in or around the immediate area.

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10. This agreement has been negotiated between [Local Authority] and Gypsy/Traveller people in the [local] area. You are encouraged to cooperate with the Local Authority to make the agreement work by discussing any incidents, concerns or suggestions that may affect the agreement with local authority officers when they visit weekly. You can also telephone the council [phone number], [police liaison officer] or speak to staff at [Third party advocacy where available] if you want them to raise issues on your behalf.

I understand the above points which have been explained to me, and I agree.

Signed.....date.....

Signed......date......(local authority)

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### Glossary

#### Amenity block

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

#### Authorised site

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

#### Average

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

#### Bargee Travellers and boat dwellers

As defined by the National Bargee Travellers Association (NBTA):

"Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932".

The NBTA also distinguish between 'Bargee Travellers' and 'boat dwellers'. 'Bargee Travellers' are people whose main or only home is a boat without year-round access to a permanent mooring. 'Boat dwellers' are considered by the NBTA to be people whose main or only home is a boat and who have year-round access to a permanent mooring, whether or not that mooring has planning consent for residential use.

#### **Bedroom standard**

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

#### Bricks and mortar accommodation

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

#### Caravan

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

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

#### Concealed household

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

#### **Cultural preference**

Cultural preference in relation to Gypsies and Travellers refers to the specific customs, lifestyle choices, values, and traditions that are preferred and upheld within these communities. These cultural preferences shape their identity and daily living in several ways. Historically, many Gypsies and Travellers have a preference for a nomadic or semi-nomadic lifestyle, valuing the freedom and autonomy it provides. This mobility is not just physical but also a cultural and social dynamic that influences their community structures and interactions.

#### **Doubling up**

More than one family unit sharing a single pitch.

#### **Emergency stopping places**

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

#### Family Owner Occupied Gypsy Site

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

#### Family unit

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

#### Gypsy

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

#### **Gypsy and Traveller**

The DLUHC's December 2023 definition of Gypsies and Travellers<sup>29</sup>, is set out below:

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

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

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

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

#### **Hidden Household**

A household not officially registered as occupying a site/yard or pitch/plot who may or may not require separate accommodation.

#### Household

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

<sup>&</sup>lt;sup>29</sup> See: https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites.

#### **Irish Traveller**

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

#### **Local Authority Sites**

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

#### Local Development Documents (LDD)

These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

#### **Negotiated Stopping**

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

#### Net need

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

#### New Traveller (formerly 'New Age Traveller')

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

#### Newly forming families

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

#### Overcrowding

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

#### Permanent residential site

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

#### Pitch

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

#### **Primary data**

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

#### **Private rented pitches**

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

#### Secondary data

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

#### **Settled community**

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

#### Site

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

#### Socially rented site

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

#### Tolerated

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

#### Transit site/pitch

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are

sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

#### **Travelling Showpeople**

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

Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equalities Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>30.</sup>

The DLUHC (2023) definition of Travelling Showpeople is:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.<sup>31</sup>

#### **Travelling Showpeople Plot**

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

#### **Travelling Showpeople Yard**

An area of land laid out and/or used for Travelling Showpeople for residential occupation, which can be authorised (have planning permission) or unauthorised. Yards can be self-owned by a Travelling Showpeople resident or rented from a private or social landlord. Some yards are leased or rented from the Showmen's Guild. They can vary in type and size although they need to consider the need for residents to store and maintain fairground equipment.

#### **Unauthorised development**

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

<sup>&</sup>lt;sup>30</sup> DCLG, Consultation on revised planning guidance in relation to Travelling Showpeople, January 2007, p. 8

<sup>&</sup>lt;sup>31</sup> DLUHC, Planning Policy for Traveller Sites, December 2023.

#### Unauthorised encampment

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

#### Unauthorised site

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