



Preparing Regional
Spatial Strategy
reviews on Gypsies
and Travellers by
regional planning
bodies

planning



Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies

Centre for Urban and Regional Studies
University of Birmingham

Salford Housing & Urban Studies Unit
University of Salford

Centre for Regional Economic and Social Research
Sheffield Hallam University

March 2007
Department for Communities and Local Government

The findings and conclusions in this report and summary are those of the authors and do not necessarily represent the views of Communities and Local Government

On 5th May 2006 the responsibilities of the Office of the Deputy Prime Minister (ODPM) transferred to the Department for Communities and Local Government

Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU
Telephone: 020 7944 4400
Website: www.communities.gov.uk

© *Queen's Printer and Controller of Her Majesty's Stationery Office, 2007*

Copyright in the typographical arrangement rests with the Crown.

This publication, excluding logos, may be reproduced free of charge in any format or medium for research, private study or for internal circulation within an organisation. This is subject to it being reproduced accurately and not used in a misleading context. The material must be acknowledged as Crown copyright and the title of the publication specified.

Any other use of the contents of this publication would require a copyright licence. Please apply for a Click-Use Licence for core material at www.opsi.gov.uk/click-use/system/online/pLogin.asp, or by writing to the Office of Public Sector Information, Information Policy Team, St Clements House, 2-16 Colegate, Norwich, NR3 1BQ. Fax: 01603 723000 or email: HMSOlicensing@cabinet-office.x.gsi.gov.uk

If you require this publication in an alternative format please email alternativeformats@communities.gsi.gov.uk

Department for Communities and Local Government Publications
PO Box 236
Wetherby
West Yorkshire
LS23 7NB
Tel: 08701 226 236
Fax: 08701 226 237
Textphone: 08701 207 405
Email: communities@twoten.com
or online via the Communities and Local Government website: www.communities.gov.uk

Printed in the UK on material containing no less than 75% post-consumer waste.

March 2007

Product Code: 06 PD 04412

Contents

List of Tables	7
Acknowledgements	9
Summary	10
Chapter 1	
Introduction	13
1.1 Report Outline	15
1.2. Supporting Material	15
Chapter 2	
Some Preliminary Principles	17
Chapter 3	
Estimating Regional Pitch Requirements	20
3.1. Starting points and basic information	20
3.2. Steps 1-3 of the ‘Tool’: Estimating Regional Pitch Requirements	23
Step 1: Assembling GTAA information and stock-taking	23
Step 2: Benchmarking GTAA information	24
Step 3: Filling gaps and assessing regional pitch requirements	36
3.3. Longer term assessments	42
Chapter 4	
Allocating Pitch Requirements Between Local Planning Authorities	43
4.1 Step 4: Stock-taking information at LPA level	43
4.2 Step 5: Filling gaps at LPA level	44
4.3 Step 6: Considering a ‘strategic view of needs across the region’	47
Chapter 5	
Transit Needs	57
5.1. Basic information	57
5.2. Understanding unauthorised encampment	58
5.3 Flexible options	59
5.4 A wider perspective	59

Annex 1:

Example Calculation From ODPM Draft Practice Guidance on Gypsy and Traveller Needs Assessment	60
---	----

Annex 2:

Applying The Tool in the East of England: A Case Study Example	61
East of England context	61
Transit needs in the east of England	72

Annex 3:

Detailed Tables Relating to the Application of the Tool in the East of England	74
--	----

List of Tables

Table 3.1	Example of Output from Step 1	24
Table 3.2	Assessment of Relationships between Current Authorised Pitch Provision and Requirements in GTAAs Reviewed	38
Table 3.3	Estimated Pitch Requirements for Example Region	41
Table 4.1	Estimating LPA Pitch Requirements in Example Region	46
Table A2.1	Pitch Requirement and Source of Estimate for each GTAA or County Area in the East of England	67
Table A2.2	Summary of Pitch Need to 2011 by Local Planning Authority	69
Table A3.1	Output From Step 1 of the Tool in East of England	75
Table A3.2	Output of the Benchmarking Exercise for East of England GTAAs	78
Table A3.3	Calculation of Regional Pitch Requirements (Step 3)	90
Table A3.4	Bedfordshire & Luton Pitch Allocation	91
Table A3.5	Cambridgeshire & Peterborough Pitch Allocation	92
Table A3.6	Essex & Unitary Authorities Pitch Allocation	93
Table A3.7	North & East Hertfordshire Pitch Allocation	94
Table A3.8	South & West Hertfordshire Pitch Allocation	94
Table A3.9	Norfolk Pitch Allocation	95
Table A3.10	Suffolk Pitch Allocation	96
Table A3.11	Detailed Output from Step 6	97
Table A3.12	Information on Transit Need from GTAAs	102

List of Figures

Figure A2.1	Total Number of Caravans by Region	62
Figure A2.2	Percentage Change in Caravan Numbers in the East of England and England between January 1994 – January 2006	63

Acknowledgements

The research team would like to acknowledge the help of members of the Project Advisory Group for their support and encouragement.

We would also like to thank officers of the Communities and Local Government Gypsy and Traveller Unit and the East of England Regional Assembly, and all those who commented on drafts of this report.

Summary

Under the new approach to planning for Gypsy and Traveller site provision, Regional Spatial Strategies are to identify total pitch requirements at regional level, and allocate these between Local Planning Authorities (LPAs). This allocation is to be on the basis of Gypsy and Traveller Accommodation Assessments produced by local authorities and a strategic view of regional needs. In the changed context, research was commissioned by Communities and Local Government in partnership with the Government Office for the East of England and the Regional Assemblies for the East, South East and South West. The research aims were to:

- Produce a methodology which can be employed by Regional Planning Bodies (RPBs) to benchmark the robustness and consistency of Gypsy and Traveller Accommodation Assessments (GTAAAs) covering their region and, where appropriate, GTAAAs in adjoining regions.
- Develop a transparent and reliable method for translating the results of local GTAAAs into regional pitch requirements.
- Support RPBs in the process of allocating pitch requirements between LPAs.
- Apply the methods devised in the East of England – both to assist the East of England Regional Assembly and to act as a ‘case study’ example for other regions.

The output of the research was a ‘tool’ which can be used by RPBs in their task of estimating regional pitch requirements and generating options for allocating this requirement between LPAs. The tool has been developed on the basis of three principles:

- ***It is a matter of some urgency that progress is made*** with regard to meeting the accommodation needs of Gypsies and Travellers. The results arising from the application of the tool will inevitably be rudimentary but do ***represent a starting point, and a way forward***.
- The tool, and the results arising from its applications, represent an ***interim measure*** which must be subject to ongoing review.
- The tool ***focuses on estimating residential pitch requirements*** and LPA allocations only. Transit requirements are looked at separately.

The sources of information used in the tool are local GTAAAs and the twice-yearly Gypsy and Traveller Caravan Count carried out by local authorities and published by Communities and Local Government.

The tool comprises six Steps. These are:

- Step 1:** Assembling GTAA information and stock-taking
- Step 2:** Benchmarking GTAA information
- Step 3:** Filling gaps and assessing regional pitch requirements
- Step 4:** Stock-taking information at LPA level
- Step 5:** Filling gaps at LPA level
- Step 6:** Considering principles which influence a ‘strategic view of needs’

The most important elements here are the approach to benchmarking GTAAs (Step 2), the formula proposed to fill gaps in regional pitch requirements and/or at the level of LPAs (Steps 3 and 5), and the principles influencing a strategic view of needs (Step 6).

Benchmarking proceeds by means of a series of questions. The issues involved are described together with an assessment of their likely implications and possible adjustments RPBs might apply if a GTAA proves inaccurate. The questions are intended to ensure that methods are robust and that the various elements of need and supply have been considered.

A **requirements formula** is suggested for filling gaps in current GTAA coverage. This uses information from the Caravan Count (converting caravans to pitches by dividing by 1.7 which is the figure found to reflect the average number of caravans per pitch in GTAAs reviewed). The formula is based on the assumption that, over a GTAA area as a whole, requirements reflect all unauthorised development of Gypsy and Traveller sites in the area plus an element proportionate to the number of authorised public and private pitches in the area. Looking at GTAAs across the East of England and checking their robustness leads to the formulation:

$$\text{Requirement} = \text{UDP} + 0.4\text{AP}$$

Where:

UDP = the number of pitches in unauthorised developments calculated by Count caravans on unauthorised sites on Gypsy-owned land divided by 1.7

AP = the number of authorised pitches calculated by Count caravans on authorised local authority and RSL (socially rented) and private sites divided by 1.7

0.4 = the relevant proportion of authorised pitches to be applied, established empirically from robust GTAAs

Applying the formula to fill gaps in GTAA coverage, or to adjust GTAA requirements where benchmarking has suggested that they would significantly over- or under-estimate requirements, provides an overall regional pitch requirement estimate. Applying the formula at LPA level where there is no LPA-level breakdown of pitch requirements in a GTAA provides an estimate of requirements by LPA based on 'need where it arises'. This provides a base situation on which RPBs can consider strategic pitch allocations between LPAs.

Planning principles that RPBs might wish to take into account when considering the distribution of the regional pitch requirements between individual LPAs include:

- Sustainability
- Equity and choice
- Social inclusion
- Environmental protection
- Flexibility

A series of questions is set out to assist RPBs to consider the implications of these in a systematic way when generating pitch allocation options.

While not included in the tool, RPBs should consider requirements for transit/transient accommodation in the RSS reviews to facilitate travelling and reduce the poor living conditions and community tensions produced by unauthorised encampment. We identify the possible sources of information, note the diversity of needs involved and stress the importance of taking a wide view, including liaison with adjoining regions.

Annex 2 presents the results of applying the proposed tool in the East of England – the Region which is most advanced in the process of producing an RSS Review for Gypsies and Travellers, and which has the highest Gypsy and Traveller population (in caravans) in England. Step 1 (stocktaking current GTAA coverage) reveals that ten of the 48 LPAs in the Region currently are not covered by a completed GTAA (completion is anticipated by Spring 2007). There are currently six completed GTAAs of different geographical scale. These GTAAs were benchmarked (Step 2). One was found to be generally robust and one to be robust with a very minor amendment. Two were found likely to under-estimate pitch requirements and one to over-estimate requirements. Insufficient detail was provided in the report of the remaining GTAA to assess the robustness of calculated pitch requirements. Following benchmarking, calculation of regional pitch requirements in Step 3 drew on the assessment from one GTAA unchanged, and on one with minor amendment. The requirement for the remaining five GTAA or county areas was calculated using the formula devised for filling gaps. The resulting regional total is a requirement for 1,220 net additional residential pitches over the five years to 2011.

Stocktaking in Step 4 revealed that only fourteen LPAs had an LPA-specific pitch requirement calculated in a GTAA (four of the six completed GTAAs estimate requirements only across their whole area). Using the formula to fill gaps produced pitch requirements at LPA level ranging from 0 to 180 on a ‘need where it arises’ basis. This information will provide a base on which EERA can make pitch allocations to LPAs in the RSS review incorporating a strategic view of requirements and where they should be met (Step 6). The proposed checklist of questions to be applied at Step 6 is worked through and comments are made on the basis of research and wider experience. Points made are always things to consider rather than ‘answers’.

Finally, Annex 2 presents approaches to considering transit/transient accommodation needs in the East of England. On the basis of Gypsy and Traveller Caravan Count information, some 20-30 sites each providing space for 10-15 caravans (plus an allowance for vacancies) might be needed across the Region to accommodate summer caravan levels on unauthorised encampments. The LPAs with the highest and most persistent experience of unauthorised encampment are identified.

Chapter 1: Introduction

Regional Planning Bodies have an important role to play in the Government's new policy framework for the provision of Gypsy and Traveller caravan sites. Very broadly, the Housing Act 2004 requires local authorities to assess the accommodation needs of Gypsies and Travellers (in Gypsy and Traveller Accommodation Assessments or GTAAs). Land for additional Gypsy and Traveller caravan sites must be identified in local planning authorities' Development Plan Documents prepared under the Planning and Compulsory Purchase Act 2004. The number of pitches required across the region, and the number to be provided for by each local planning authority (LPA), are determined within the Regional Spatial Strategy (RSS) review process through which Regional Planning Bodies (RPBs) check and modify pitch numbers provided by GTAAs from a regional perspective. Pitch numbers for each LPA are to be specified in the RSS in the light of the GTAAs and a strategic view of needs across the region.

The regional dimension is intended to ensure that all local authorities contribute to resolving the current shortage of authorised site accommodation in a strategic manner which helps redress current imbalances in the pattern of provision and enhances the sustainability of the Gypsy and Traveller site network. Such a strategic approach will contribute to meeting the Government's objective¹ that 'Gypsies and Travellers and the settled community should live together peacefully' and to the greater social inclusion of Gypsies and Travellers who are among the most deprived groups in the population.

Determining regional pitch requirements and allocating them between constituent LPAs is a new task for RPBs – within a total framework which is equally new. This report presents the results of research commissioned to support RPBs in their task by Communities and Local Government in partnership with the Government Office for the East of England and the Regional Assemblies for the East, South East and South West. The research objectives were to:

- Produce a methodology which can be employed by RPBs to benchmark the robustness and consistency of GTAAs covering their region and, where appropriate, GTAAs in adjoining regions.
- Develop a transparent and reliable method for translating the results of local GTAAs into regional pitch requirements.
- Support RPBs in the process of allocating pitch requirements between LPAs.
- To apply the methods devised in the East of England – both to assist the East of England Regional Assembly and to act as a 'case study' example for other regions. This can be found in Annex 2.

¹ ODPM (2006) *Local authorities and Gypsies and Travellers: Guide to responsibilities and powers*, ODPM, page 5 http://www.communities.gov.uk/pub/400/LocalAuthoritiesandGypsiesandTravellersGuidetoresponsibilitiesandpowersPDF223KB_id1163400.pdf

The research was undertaken by a consortium of researchers from three Universities who have all had direct experience of carrying out assessments of Gypsy and Traveller accommodation needs at different scales. The Research Team was:

- Pat Niner (project leader) and Mike Beazley, Centre for Urban and Regional Studies, University of Birmingham.
- Phil Brown, Andy Steele and Lisa Hunt, Salford Housing & Urban Studies Unit, University of Salford.
- Kesia Reeve and Ryan Powell, Centre for Regional Economic and Social Research, Sheffield Hallam University.

Two main research approaches were used:

- Benchmarking sixteen GTAAAs selected to include all those currently produced in the East of England and a sample of others to illustrate a range of scales (single authority to region), geographical location and author (examples of work of all the major consultants known to be active in the field were included as well as assessments produced by local authorities in-house). A benchmarking pro forma was produced which has informed Step 2 of the 'tool' presented in Chapter 3.
- A series of three workshops involving the Research Team (other stakeholders were also involved in Workshop 2) was held. These considered 'think-piece' papers prepared by the Research Team on topics as follows:
 - The demographic characteristics of Gypsies and Travellers and likely future trends
 - What is known of the diversity of the Gypsy and Traveller population and implications
 - Mobility, travelling patterns and implications
 - Accommodation aspirations of Gypsies and Travellers
 - A context paper on the regional planning process
 - Planning principles and RSS policy considerations
 - Best practice on site identification processes including consideration of size, location and ownership
 - Design, management and location considerations for Gypsy and Traveller sites when determining broad distributional patterns to ensure effective and sustainable provision
 - Towards developing a 'tool' for assessing regional pitch requirements and allocations.

The experience of benchmarking sampled GTAAAs, and producing and discussing the workshop papers contributed directly to the formulation of the approach to assessing and allocating regional pitch requirements described in this report. It also contributed indirectly by increasing our understanding of the issues involved – and their complexity.

1.1 Report outline

This report is intended to help RPBs determine regional pitch requirements on the basis of available GTAAs and other information. It sets out a method by which requirements at local authority level might be identified – purely on the basis of where that need arises. It also comments on principles to be taken into consideration when generating options for pitch allocations between LPA, including the extent to which need is potentially ‘transferable’ between areas. Because it includes a process for benchmarking GTAAs for reliability, the report will also be useful to local authorities undertaking assessments in alerting them to potential weaknesses and omissions in approaches.

Chapter outline

Chapter 2 – sets out some of the basic principles and assumptions on which our approach is based

Chapter 3 and 4 – describe the proposed method (hereafter referred to as ‘the tool’) which comprises six steps.

Chapter 3 outlines the three Steps required to produce a regional assessment of pitch requirements and ensure that it is as robust as possible. It also deals with circumstances where existing GTAAs may be incomplete, inadequate or inconsistent.

Chapter 4 sets out a further three Steps which assist RPBs in generating options for pitch requirements between LPAs.

Chapter 5 – looks briefly at issues around the requirement for transit site and temporary stopping place provision.

Annex 2 – we apply ‘the tool’ to the East of England in order to provide a working example of its application.

1.2 Supporting material

While the report can be read in isolation, it is helpful to refer to other important policy documents. These include:

- ODPM Circular 01/2006 : *Planning for Gypsy and Traveller Caravan Sites* (February 2006).² This sets out the revised planning framework for Gypsy and Traveller sites, including the regional role (paragraphs 22-26). The circular has generally informed our overall approach.

² Available at: http://www.communities.gov.uk/pub/389/Circular0106ODPMPlanningforGypsyandTravellerCaravanSitesPDF253Kb_id1163389.pdf

- ODPM *Gypsy and Traveller Accommodation Assessments: Draft practice guidance* (February 2006).³ This is a significant document because it signals a baseline of expectations on GTAAs. In the context of our work, it is important to note two points: the draft *Guidance* was only issued in February 2006 and a number of the GTAAs we benchmarked, and which RPBs will have to deal with in initial RSS reviews, were produced before its publication. Secondly, the *Guidance* is not prescriptive. Taken together, these points mean that the first round GTAAs are highly variable in approach and, we believe, in the robustness of their assessments.
- ODPM Planning Policy Statement 11 *Regional Spatial Strategies* (2004)⁴. This describes the processes and procedures of producing and reviewing RSSs, and provides the context of all the work of RPBs in this area.
- Statutory Instrument 3190 *The Housing (Assessment of Accommodation Needs)(Meaning of Gypsies and Travellers (England) Regulations 2006* (November 2006).⁵ This sets out the definition of Gypsies and Travellers to be used in connection with the Housing Act 2004 and accommodation needs assessment; it came into force in January 2007.

³ Available at: http://www.communities.gov.uk/pub/404/GypsyandTravellerAccommodationAssessmentsDraftpracticeguidancePDF225KB_id1163404.pdf

⁴ Available at: http://www.communities.gov.uk/pub/844/PlanningPolicyStatement11RegionalSpatialStrategies_id1143844.pdf

⁵ Available at: http://www.opsi.gov.uk/si/si2006/uksi_20063190_en.pdf

Chapter 2: Some Preliminary Principles

This report presents a method, or ‘tool’, designed to support RPBs in their task of determining regional pitch requirements and allocating these between LPAs in each region. Accurately determining the extent of local pitch requirements and apportioning these to constituent local authorities is, however, an inherently difficult task at the present time partly because the system is so new and practice still very variable.

It is important, then, to state clearly at the outset the principles and assumptions on which our approach is based. In doing so this helps to clarify the scope of the tool, its capabilities, parameters and limitations. The following three key principles informed development of the tool and underpin its application:

- ***It is a matter of some urgency that progress is made*** with regard to meeting the accommodation needs of Gypsies and Travellers. The results arising from the application of the tool will inevitably be crude but do ***represent a starting point, and a way forward***.
- The tool, and the results arising from its applications, represent an ***interim measure*** which must be subject to ongoing review.
- The tool ***focuses on estimating residential pitch requirements*** and LPA allocations only. The issues in relation to transit provision are different and are addressed briefly in Chapter 5.

Each principle is discussed in turn.

Principle 1: The tool can only provide crude estimates of pitch requirements, but represents a solid foundation on which to move forward in meeting the accommodation needs of Gypsies and Travellers

The process of assessing Gypsy and Traveller accommodation needs is very much in its infancy and, consequently, a significant deficit in knowledge and understanding about Gypsy and Traveller requirements and issues remains. For example:

- It was only in 2004, with the introduction of the Housing Act of that year, that an obligation was placed upon local authorities to assess the needs of Gypsies and Travellers in their area. Prior to this, efforts to consult with local Gypsy and Traveller populations or to assess their accommodation needs were rare.
- A number of GTAAs were carried out prior to the production of the ODPMs *Draft practice guidance*. Those undertaken subsequently have worked to guidance acknowledged to be of an interim nature (and currently under revision).
- Secondary data about Gypsies and Travellers on which GTAAs can draw is patchy and can be unreliable. Local statistics about unauthorised encampments, for example, are not always comprehensive, and site waiting list data are not always available. In addition, social housing providers rarely incorporate ethnic Gypsies and Travellers into their ethnic monitoring classifications and so obtaining information about Gypsies and Travellers in bricks and mortar housing is notoriously difficult.

It is not surprising, then, that our understanding about Gypsies and Travellers – about their requirements and the factors influencing these – is not yet sufficiently developed or adequate to inform the development of site provision which we can be certain will meet the extent of need in a way which is appropriate to the requirements and preferences of all sections of this population.

However, action must be taken. It is generally acknowledged that there is a severe backlog of need which must urgently be addressed. The January 2006 Caravan Count showed that, of the 15,746 Gypsy and Traveller caravans counted across England, 3,272 or over a fifth (21%) were on unauthorised sites. This figure comprises both unauthorised development where Gypsies and Travellers are living on their own land but without planning permission (14 per cent of all caravans across England) and unauthorised encampment where caravans are on other land, normally involving trespass (7 per cent of all caravans). Both forms of unauthorised use lead to poor living conditions and uncertainty for Gypsies and Travellers, and fuel community tension and conflict. In this context, waiting for perfect information and comprehensive understanding is, quite simply, not an option.

The limitations of current knowledge about Gypsies and Travellers and the complexities of the issues involved dictate that, at present, no method would be capable of producing an incontestable estimate of regional pitch requirements. The evidence from which such estimates and allocation decisions would be derived is simply not robust enough to ensure high levels of confidence about the accuracy and reliability of the results. Inevitably, the tool is only capable of providing crude estimates about the number of pitches required regionally, and *recommendations* about how to allocate these pitches to the constituent local authorities.

Nevertheless, it is essential that RPBs are furnished with tools to enable them to move forward in endeavours to address the deficit in Gypsy and Traveller site provision. While the method outlined in the following sections certainly has limitations, it represents a way of doing just that. In addition, the tool is based upon the most robust information and evidence available to us at the current time and does, therefore, provide a sound basis for moving forward. As more robust and comprehensive evidence emerges about Gypsies and Travellers, and as our knowledge improves and develops, the accuracy and reliability of the results arising from application of the tool will also increase.

Principle 2: The tool proposed in this report, and the results arising from its application, represent an interim measure in meeting the needs of Gypsies and Travellers

It follows from the above that the tool proposed in this report should be seen as an interim measure until more robust information is available. Recognising this fact:

- Application of the tool results in estimates of short-term (up to five years) requirements only. It is not feasible, and would not be sensible, to project forward for twenty years or more. Suggestions are made about the sort of calculations which might be made to identify need in the longer term, but these can only be indicative at present.

- Once the tool has been applied by RPBs and progress made to action the results, it will be essential that a process of ongoing monitoring and review is implemented. Progress towards Gypsy and Traveller site provision will be an important element in the annual monitoring reports required by the planning system. Subsequent RSS reviews should build upon increasing understanding of Gypsy and Traveller accommodation issues, and especially the impacts which planned site provision has on demographics, needs and aspirations and travelling patterns.

Principle 3: The tool focuses on estimating residential, rather than transit pitch requirements

Residential and transit needs represent very distinct requirements but in the current context of extreme accommodation shortage for Gypsies and Travellers, they become somewhat blurred. Families currently on the move, who rely on unauthorised encampments and developments, often do so because access to, and availability of, residential pitches is restricted. Transit sites, where provided, can become ‘clogged’ by Gypsies and Travellers who have nowhere else to go. Conversely, some families wishing to travel may currently be unable to do so because of limited availability of transit pitches.

Travelling patterns amongst the Gypsy and Traveller population, and the factors influencing these, is an issue about which little is currently known, and one where the current round of GTAAs have not provided much information. There are also considerable differences of opinion amongst professionals working with Gypsies and Travellers and among Gypsies and Travellers themselves as to how transit needs can best be met.

In this context, given the short time scale of the research, we have concentrated mostly on requirements for residential pitches where better information is available. The tool deals only with residential pitch requirements and their allocation to LPAs.

This does not, however, mean that RPBs should ignore needs for some form of transit accommodation when undertaking RSS reviews. Nomadism is still, to some extent, an important part of Gypsy and Traveller identity and lifestyle. Need generated by travelling certainly underlies a significant element of current unauthorised encampment. Chapter 5 briefly examines some of the issues around planning for transient need which RPBs might need to consider.

Chapter 3: Estimating Regional Pitch Requirements

This chapter sets out a process and method (a tool) which RPBs can apply in order to translate available information from local GTAAs and other sources into a reliable and consistent assessment of regional pitch requirements. Inevitably some assumptions are involved, but these are as valid and well-evidenced as the current state of knowledge allows.

As noted in the previous chapter, the emphasis is on:

- residential pitch provision rather than transit requirements
- the short- to medium-term of five years rather than full RSS plan periods of twenty years or so.

It is also important to stress that all assessments are of **net additional** pitch requirements, over and above current provision of authorised sites and pitches. If existing authorised pitches are to be lost within the assessment period, the requirement includes a one-for-one replacement.

This chapter is divided into three sections. The first describes starting points and sources of information and the second outlines Steps 1 – 3 of the tool. Step 1 of the tool involves assembling information and stock-taking and Step 2 describes a benchmarking process whereby the reliability and consistency of local GTAAs can be assessed. Step 3 illustrates the way in which any gaps in assessments created by missing or suspect information might be filled. The outcome of Step 3 is a regional assessment of pitch requirements. The final section in the chapter sets out an approach which RPBs might use to provide a crude assessment of likely requirements beyond the initial five year period.

3.1. Starting points and basic information

Gypsy and Traveller accommodation needs assessments

The most obvious starting point for RPBs are the GTAAs completed which cover local authorities in the region and, where appropriate, for areas adjoining the region. The research indicates clearly that, at present in this first round of assessment, GTAAs alone are unlikely to provide all the information required to make a robust regional assessment of requirements. There are a number of factors here:

- Most obviously, in the short term, geographical coverage is incomplete. Even in the regions where assessments are furthest advanced (East of England, South East and South West) there are still gaps and in other regions very few assessments have been completed.

- GTAAs reviewed in the research varied widely in scale from a single local authority to a study covering fourteen authorities. It follows that the scale of analysis varies. Some comment on specific sites and locations, others are at a much more general and abstract level.
- There are some clear inconsistencies between studies which make it dangerous to simply add findings together to reach a total. For example, not all studies include housed Gypsies and Travellers in the sample frame, and where included different ways of identifying families in housing have been used. This is potentially serious because a major element in pitch requirements in some studies is an allowance to accommodate need to move from housing to sites.
- There are differences between studies in the extent to which methods for calculating pitch requirements are explained and transparent. Where they are set out, GTAAs have made different assumptions and taken slightly different things into account. This is true of both the need and supply sides of the requirement equation.
- Studies differ greatly in the extent to which analyses and/or estimates of requirements are disaggregated between local authorities, between different Gypsy and Traveller groups, or types of accommodation. For example, some but not all comment on the need for transit as distinct from residential accommodation needs.
- While perhaps of minor significance, the studies reviewed were carried out over more than two years, and have different base years and therefore different forecasting periods.

GTAAs reviewed have other weaknesses which may be addressed in future. For example, assessments are snapshots of very fluid reality in which an unauthorised development established over a weekend can change the apparent need for pitches significantly. Assessments – which are usually based on interviews with Gypsies and Travellers in the study area – find it hard to estimate the need to be in the study area of those currently living outside it, perhaps because of lack of accommodation. There is also a tendency to conflate need, demand and aspiration. Many present findings under such broad headings, but it is not always clear whether the question was about an ideal, a realistic expectation or an actual intention.

Uncertainty and inconsistency is not surprising given that this is the first round of assessments, sometimes made before (non-prescriptive) *Guidance* was issued, concerning a population group about whom relatively little is known. The conclusion is not that current GTAAs are redundant or ineffective, but that the process by which they were produced, the quality of the information on which they are based and the assumptions made in assessing requirements must all be critically examined. This is Step 2 of the tool outlined below.

The Gypsy and Traveller caravan count

Counts of Gypsy and Traveller Caravans have been made by local authorities in January and July each year since 1979. The system was reviewed in 2004⁶ and revised across England from January 2006. Count information is invaluable for providing time-series data at local authority level for caravans on socially rented (formerly council) and private authorised sites, and on unauthorised sites with distinctions made between tolerated and not tolerated sites on Gypsy-owned land, and tolerated and not-tolerated sites on other land (broadly the former represents unauthorised development of sites without planning permission and the latter unauthorised encampment involving trespass).

There are two limitations to the Count as a source of information for RPBs to use in determining regional pitch requirements:

- Gypsies and Travellers living in housing are not included. The Count therefore provides a partial picture of the Gypsy and Traveller population in an area, and especially in very urban areas where the majority of Gypsies and Travellers are thought to live in bricks and mortar accommodation.
- The review identified many areas of inconsistency in the way local authorities carried out the Count. The review – and specific examples of errors and omissions and wide anecdotal evidence – suggest that the Count under-estimates the number of Gypsy and Traveller caravans by an unknown amount. Information is most likely to be reliable for caravans on council-owned sites and less reliable for private authorised sites and, particularly, unauthorised sites where it is known that not all authorities keep good records of unauthorised encampments.

Both these factors work to under-estimate the current number of Gypsies and Travellers and, by implication, any future requirements assessed from a Count base. The tool suggests that the Count is used in filling gaps in current GTAA coverage. It must be stressed that this means that resulting assessments will be the bare minimum rather than generous.

Other sources of information

Other sources of information are sometimes used in GTAAs. For example, Traveller Education Service information has been used to estimate total numbers of Gypsies and Travellers in an area including those in housing. Some studies have used site management records and waiting lists, and some have attempted to assemble information from local authorities and registered social landlords about housed Gypsies and Travellers, applicants and allocations. Such sources of information are likely to be more accessible to local authorities than to RPBs. The tool does not envisage that RPBs will collect such information as a matter of course in assessing regional pitch requirements.

⁶ Pat Niner, *Counting Gypsies and Travellers: A Review of the Gypsy Caravan Count System*, ODPM 2004 <http://www.communities.gov.uk/index.asp?id=115376>

However, RPBs may have other specific sources of information about the Gypsy and Traveller population, or current provision or requirements not adequately reflected in either GTAA or the Count. For example, an unauthorised development might have been established after completion of a GTAA, or a known site may have been omitted from a GTAA. It is important the RPBs scan major developments, which may reach the local press, and the tool provides the opportunity to incorporate such knowledge into the regional assessment.

3.2 Steps 1-3 of the 'Tool': Estimating regional pitch requirements

This section outlines and explains Steps 1-3 of the tool, the output of which is an estimate of regional pitch requirements. The three Steps are:

Step 1: Assembling GTAA information and stock-taking.

Step 2: Benchmarking GTAA information, using a checklist of twelve questions.

Step 3: Filling gaps and assessing regional pitch requirements, using a pragmatic formula to express the relationship between requirement and existing authorised site provision and extent of unauthorised development of sites without planning permission.

A further three Steps, designed to assist RPBs with allocating pitch requirements between Local Planning Authorities are outlined in Chapter 4.

Step 1: Assembling GTAA information and stock-taking

The first Step in the tool is simply to assemble information and carry out a stock-taking of what is available. The example below shows the anticipated output from this Step in the context of a totally imaginary region of three geographical counties comprising fourteen districts authorities and one unitary council (see Table 3.1.).

As can be seen, all the LPAs in the region are listed in the first column of Table 3.1. Unitary authorities are grouped with the appropriate county. The second column notes which GTAA covers the LPA (all are covered by an assessment except Ceecaster), and the third the period covered by the GTAA assessment (all five years in the example but from different start dates). The fourth column records the assessment of residential pitch requirements from the GTAA for the smallest geographical area available. In the example, the Zedshire GTAA provided pitch requirements by LPA, but the Wyeshire assessment produced only a county-wide total.

The two final columns note information from the Count for caravans on authorised sites (socially rented and private) and on unauthorised developments (caravans on unauthorised sites on Gypsy-owned land). This information will be needed at Steps 3 and 5 of the tool, and is recorded now for convenience. We suggest that the most recent January Count figures should be used because winter figures normally represent a better indication of the base population than summer. However, if either figure **increased** significantly (say by more than 10 at LPA level) between January and the following July, the July figure should be used in preference.

Table 3.1: Example of Output from Step 1

Regional assessment of pitch requirements basic information

			From GTAA	From Count	From Count
LPA and county	GTAA	Plan Period	Residential Pitch Need Assessed	Caravans on Authorised Sites	Caravans on Unauthorised Developments
Aville	North Exshire	2006-11	30	110	0
Beeton	Beeton	2005-10	50	320	45
Ceecaster			NA	410	77
Deeminster	North Exshire	2006-11	10	43	10
Exshire				883	132
Eefield	Wyeshire	2005-10	NA	0	0
Efferton	Wyeshire	2005-10	NA	210	0
Geeborough	Wyeshire	2005-10	NA	200	10
Aitcham	Wyeshire	2005-10	NA	75	0
Eyeport	Wyeshire	2005-10	NA	60	7
Arehampton (unitary)	Wyeshire	2005-10	NA	80	0
Wyeshire + Arehampton			160	625	17
Jaychester	Zedshire	2006-11	70	120	0
Kaymouth	Zedshire	2006-11	40	75	0
Elletown	Zedshire	2006-11	150	231	30
Emmemmy	Zedshire	2006-11	0	0	0
Ennerby	Zedshire	2006-11	290	525	30
Zedshire			550	951	60

The example immediately reveals a gap in GTAA coverage in Ceecaster which must be filled. It also shows that GTAAs do not provide a full breakdown between LPAs. (Steps 3 and 5 of the tool, outlined below, deal with these issues).

Step 2 now seeks to assess whether the GTAA assessed pitch requirements, where available, are sufficiently consistent and robust to be accepted without amendment. The benchmarking at this stage is at the level of the whole GTAA where the assessment is on a joint basis, not at individual constituent LPA level.

Step 2: Benchmarking GTAA information

The purpose of Step 2 is to allow RPBs to systematically examine local GTAAs with a view to checking their robustness. We set out a series of twelve questions, developed from our own benchmarking exercise, to be answered for each GTAA. The tool identifies circumstances or assumptions which might lead to the GTAA either over- or under-estimating need and suggests what sort of adjustments might be made to counter inaccuracy. For clarity, the questions are treated in a tabular form with comments presented under the same headings for each.

Q1: Are all appropriate groups considered in the assessment?***The Issue***

An assessment of pitch requirements can only be robust if it takes account of the needs of everyone potentially requiring a pitch on some form of Gypsy and Traveller site. This is not always the case. For example, some assessments have not taken into account any pitch requirements from Gypsies and Travellers currently in housing; others have not examined whether there are any requirements for permanent pitches from unauthorised encampments. 'Gypsies and Travellers' include a number of diverse and distinct groups, loosely associated because of an evident desire/need to live in caravan accommodation among other members of the same community. Some assessments include Travelling Showmen while others exclude them; New (Age) Travellers similarly might be included or excluded.

To give a comprehensive assessment of requirements, it is important that the main groupings of Gypsies and Travellers are included:

- (English) Romany/Gypsies
- Irish Travellers
- Welsh and Scottish Gypsies and Travellers
- New (Age) Travellers
- Travelling Showmen and Circus People

It is also important that requirements arising from each of the possible current accommodation situations is included:

- Authorised sites (council and private)
- Unauthorised developments
- Unauthorised encampments
- Bricks and mortar housing

Implications

If either Gypsy and Traveller groups or current accommodation types known to be present in the locality are omitted, then the assessment is likely to under-estimate requirements.

If Travelling Showmen and Circus People are included in some but not all GTAA's, this will introduce inconsistency.

Possible adjustments

Subsequent questions deal with omission of requirements arising from different forms of current accommodation.

It would be hard to remedy the omission of a Gypsy and Traveller group unless there is sound evidence available to the RPB of the size of that group in the locality. This is probably unlikely. If the assessment omitting a group appears to produce requirements significantly lower (relative to current provision) than other GTAA's in the region, it might be appropriate to consider adjusting requirements by the method described in Step 3.

Q2: Is the survey method used generally reliable?	
<i>The Issue</i>	
	<p>An assessment based on information collected through poor survey methods is likely to produce results which are less than reliable. For example, a survey with a very small sample (say under 20) out of a significantly larger population might, using qualitative methods, increase understanding of the issues and give a feel for local circumstances, but is unlikely to provide robust quantitative, statistical analyses. Similarly a confused questionnaire which includes unclear or ambiguous questions can scarcely provide reliable results if people interpreted the questions in different ways.</p> <p>Poor survey methods cannot always be detected easily. Not all GTAAs include a copy of the questionnaire used, and some are very brief in explaining sample selection and size. Across the GTAAs reviewed for the research, response rates were usually lower for private than for council sites, and some studies included very small numbers of families on unauthorised encampments (sometimes because there were few during the survey period). Critical common sense is the best guide to checking whether the methods applied seem appropriate.</p>
<i>Implications</i>	
	<p>Poor survey techniques will produce findings which are not reliable, but it is not possible in the abstract to say whether the net effect would be to over- or under-state requirements.</p>
<i>Possible adjustments</i>	
	<p>It is not likely to be possible to adjust for poor survey techniques. If they appear to be really inadequate, the affected GTAA could be treated as a 'gap' for Step 3.</p>

The next sequence of questions relate to the 'model' used in the GTAA for estimating pitch requirements. Some of the later GTAAs reviewed adopted the 'model' provided by the worked example on page 22 of the *Draft practice guidance* (see Annex 1). Earlier GTAAs, however, developed their own models and there is quite a variety of approaches across GTAAs.

In benchmarking GTAAs, we believe that the most important elements to check are:

Need/demand

- Current shortfall of pitches represented by families on authorised sites who are over-crowded and/or doubled up. These equate with 'concealed' households or 'involuntary sharers' in mainstream housing assessments.
- Need for authorised pitches from families on unauthorised developments.
- Potential need for residential pitches in the area from families on unauthorised encampments.
- Allowance for family growth over the assessment period among Gypsies and Travellers on authorised sites.

- Allowance for net movement over the assessment period between sites and housing (could be negative or positive, includes elements of need and supply).
- Allowance for net movement over the assessment period between the study area and elsewhere (could be negative or positive, includes elements of need and supply).

Supply of pitches

- Additional pitches likely to become available through current vacancies likely to be re-occupied, pitch turnover or currently committed developments.

These points are incorporated into a series of questions below. In addition, there are questions about other need elements incorporated in the model, Gypsy and Traveller accommodation aspirations, and a final question about the general adequacy of the approach.

Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?

The Issue

In mainstream housing there is always an element of doubling-up where families or individuals are living as part of another household but would prefer to live independently. The classic example is a young couple or single parent living with parents. Precisely the same phenomenon occurs on Gypsy and Traveller sites where some pitches accommodate extended families representing three generations or several married siblings or aunts/uncles/cousins. Because of the overall shortage of authorised pitches, there are indications that such 'doubling up' is more common on sites than among the population as a whole. However, it is less clear to what extent this is solely the result of shortage and constraints on independent household formation or of cultural preferences for living as an extended family. For example, among some Travelling groups it is firmly the tradition for adult children to remain in the parental home until marriage rather than seeking independent accommodation. Where there is room on the pitch, such 'children' will occupy separate trailers/caravans, but still be part of the 'household'.

GTAAAs should attempt to estimate pitch requirements from frustrated household formation and current GTAAAs have done this in different ways, for example by asking how many 'households' include people wishing to live independently, or by assessing the proportion of 'households' who are overcrowded. Some studies which include site waiting lists as an element of need may explicitly or implicitly cover concealed households in that way.

Implications

An assessment which makes no allowance for current pitch shortage because of overcrowding, doubling up or concealed families is likely to under-estimate pitch requirements.

An assessment which includes an allowance for doubling up or overcrowding and need from site waiting lists may over-estimate pitch requirements unless care is taken to remove double counting.

Possible adjustments	
	<p>If no allowance is made at all for this element, it may be appropriate to adjust the pitch requirement to compensate. Some studies, on the basis of survey evidence, assume that 10 per cent of pitches on authorised sites are overcrowded such that new pitches are required to relieve it. The consultants involved adjust the figure downwards for areas with large proportions of New Travellers who are known to have smaller household sizes.</p> <p>An alternative approach would be to adjust the requirement according to Step 3.</p> <p>Treatment of double counting should be judged in the context of the assessment as a whole and the apparent significance of any double counting on the overall assessed requirements.</p>

Q4: What allowance is made for needs arising from current unauthorised developments?	
The Issue	
	<p>Unauthorised development of Gypsy and Traveller caravan sites without planning consent is a feature not replicated in mainstream accommodation assessments. The Counts, and GTAAs, show that unauthorised development is geographically very patchy.</p> <p>Unauthorised development is a major cause of tension between Gypsies and Travellers and the settled population. Government objectives of greater social inclusion of Gypsies and Travellers can only be met if unauthorised developments cease – indeed the new planning system is intended to create conditions where there is no need for unauthorised development because land will be allocated for authorised site development. It follows that unauthorised development should be taken as an indication of need in the broad area within which the development has occurred if not the precise location.</p> <p>Most, but not all GTAAs take account of unauthorised developments on a one-for-one basis.</p>
Implications	
	<p>An assessment which ignores any unauthorised developments in the study area will underestimate pitch requirements. Anything less than a one-to-one replacement requirement will need careful justification.</p>
Possible adjustments	
	<p>Unless the omission is justified, requirements should be adjusted upwards to take account of unauthorised development in the way described in Step 3.</p>

Q5: What allowance is made for needs arising from unauthorised encampment?***The Issue***

In spite of the fact that unauthorised encampments are one of the major sources of tension between Gypsies and Travellers and the settled community, and the fact that living conditions for Gypsies and Travellers on unauthorised encampments are very poor, our research suggests that there is very little hard evidence about the accommodation needs of the families involved. Available information suggests that there are a number of forces behind unauthorised encampment. Some Gypsies and Travellers are 'in transit', moving from one place to another and stopping for while on the way. Some have a lifestyle which depends on working in an area for a period and then moving on. Some unauthorised encampments occur in conjunction with fairs, major family events or holidays. All these suggest the need for some sort of temporary accommodation and are not considered further here. However, in many areas it is clear that some unauthorised encampments are the result of families who want to stay in the area but literally have nowhere to go other than the roadside. These needs should be taken into account when assessing the requirement for residential pitches in an area.

GTAA's which have included analysis of need from unauthorised encampment suggest that the proportion of 'transit' and 'local' need varies widely. Some studies have attempted to apply proportions determined by the survey findings, others have applied an arbitrary approach (for example 50 per cent of caravans on unauthorised encampments as shown by the Count). No GTAA to our knowledge treats unauthorised encampment as a continuing source of need, but rather implicitly assumes that if accommodation is provided to meet requirements indicated by snapshot Counts no further **residential** need will appear from this element in future.

Implications

In our view, an assessment which makes no allowance for need for residential pitch requirements from unauthorised encampment, where this is a common occurrence, probably under-estimates requirements.

Similarly, an assessment which assumes that all unauthorised encampment requires residential pitches over-estimates requirements.

In both cases, RPBs should look for evidence which supports the approach and assumption adopted and assess its reasonableness.

Possible adjustments

Where high levels of unauthorised encampment is experienced and where no allowance has been made for it in residential pitch assessments without justification, RPBs might consider adjusting requirements upwards, perhaps by 10 per cent to 20 per cent of average encampment levels shown in the Counts (adjusted for the ratio of caravans to pitches as in Step 3). This is an arbitrary assumption and could in some places be conservative.

Q6: What allowance is made for future population growth and household formation?	
<i>The Issue</i>	
	<p>Future population growth and household formation is often the main element in needs assessments in mainstream housing. In the past, it sometimes seems to have been forgotten in the context of Gypsy and Traveller site provision. However, our research has shown that the demographics of the Gypsy and Traveller population suggest that population growth and family formation is likely to be significantly higher than in the population as a whole. Average family size is larger – across GTAAAs reviewed it averaged just under 4 persons compared with a national average of 2.36 persons. Gypsies and Travellers traditionally have married and started families young meaning that a ‘generation’ is relatively short – many grandparents are only in their 40s.</p> <p>Other things being equal, this means that pitch requirements from population and household growth are likely to be relatively rapid. Many authorised sites have high proportions of children among their residents. Over the next five years young adults will marry and form their own families and any longer term trends towards more ‘normal’ family structures are not relevant in short-term assessments.</p> <p>Several studies use a figure of 3 per cent a year compound for household increase. In the Republic of Ireland, Task Force assumptions of 4 per cent a year compound have proved remarkably accurate. Multipliers, where used, should be relevant to the characteristics of the local population.</p>
<i>Implications</i>	
	<p>An assessment which ignores future household formation will under-estimate pitch requirements. An assessment using a figure much less than 3 per cent a year probably will also under-state requirements from this element unless there are particular population characteristics to justify it (for example a high proportion of New Travellers).</p>
<i>Possible adjustments</i>	
	<p>Where this element is missing, RPBs might consider applying an assumed growth rates of 3 per cent pa compound to the total number of existing Gypsy and Traveller households on authorised pitches and unauthorised developments.</p>

Q7: What allowance is made for net movement between sites and housing?***The Issue***

Some Gypsies and Travellers living on authorised sites would prefer to live in bricks and mortar housing, perhaps for health reasons, or to be more settled for access to education and health services, or simply to try something different. Some Gypsies and Travellers leave sites because of problems or poor conditions on those sites. GTAA's reviewed usually identified proportions of Gypsies and Travellers interviewed on sites who want to move to bricks and mortar. The proportions varied between studies from zero upwards. It is important to take account of any movement from sites to houses because such movement would free site places for others.

Movement in the other direction – from houses to sites – is also examined in some GTAA's. Where Gypsies and Travellers have moved into housing because site places are not available where they want to live, new site provision might lead to movement from housing by those for whom it was second choice. Some Gypsies and Travellers moving to housing fail to settle and want to move back onto sites. For others, circumstances may change meaning that there are no longer health or education reasons for remaining in housing. There are major problems for GTAA's in assessing the extent of need from this sort of movement. First, it is very difficult to identify housed Gypsies and Travellers and therefore to know how to interpret or scale up a survey finding. The second problem is how many Gypsies and Travellers who say in answer to a survey question that they want to move to a site will actually do so in practice if a site were to be provided. In the current situation of site shortage such questions are hypothetical; much also depends on the quality and attractiveness of what is provided or indeed on the quality and cultural acceptability of the housing involved.

In the face of these problems, GTAA's make different assumptions. Several assume a net movement from houses to sites of between 5 per cent and 10 per cent of some estimate of the housed Gypsy and Traveller population. At present there is little hard evidence to say whether such assumptions are realistic.

Implications

Ignoring net movement between sites and houses risks ignoring a major element in pitch requirements in some places and thus under-estimating need. However, there may also be areas where the net flow of movement might be towards houses in which case ignoring it could lead to an over-estimate. The consensus in GTAA's so far is that net movement will be to sites.

Possible adjustments

We suggest that RPBs look critically at the way movement between sites and houses is treated in local GTAA's and whether the conclusions reached and assumptions made seem reasonable. If the issue is not dealt with at all, it might be fair to regard resulting pitch requirements as likely to be an under-estimate. If other elements in the GTAA also suggest possible under-estimation, it might be appropriate to adjust the whole assessment as in Step 3 rather than attempt an adjustment for this element alone.

Q8: What allowance is made for net movement between the study area and elsewhere?	
<i>The Issue</i>	
	<p>Mainstream housing need assessments allow for net migration, usually in the base population or household estimates used. Some areas are expected to grow more rapidly than others because of positive net migration fuelled by employment opportunities, or retirement, or planned expansion of housing provision. None of the GTAAs reviewed successfully incorporated similar migration processes for Gypsies and Travellers. There seem to be two main difficulties:</p> <ul style="list-style-type: none"> • Most studies are based on interviews with a sample of Gypsies and Travellers living in the study area. Inevitably such an approach cannot include people who need or would like to live in the area but are not there at the time of the survey. • Migration and ‘travelling’ are often confused – and indeed the concepts seem somewhat blurred for Gypsies and Travellers. Surveys often ask about travelling patterns, but this normally identifies potential need for short-term accommodation outside the study area. Desire for inward movement may be picked up in interviews with families on unauthorised encampments or through analysis of site waiting lists. <p>The Caravan Counts suggest that general migration patterns affect Gypsies and Travellers as the rest of the population. For example, the total number of caravans counted in January 2006 was 90 per cent higher than the number counted in January 1979 when the system was introduced across England as a whole. Numbers in the four southern regions (London, South East, East of England and South West) increased by 102 per cent over the period compared with 85 per cent in the East and West Midlands and 63 per cent in North, North West and Yorkshire & Humber. Unauthorised development might sometimes be linked to migration to an area: 17 per cent of all caravans in January 2006 were on unauthorised sites on land owned by Gypsies in the southern regions, compared with 12 per cent in the midlands and 5 per cent in the north. This implies that Gypsies and Travellers respond to employment opportunities and that growth rates in more prosperous areas are likely, other things being equal, to be higher than elsewhere.</p> <p>At a more local level, migration may be constrained by site provision (for Gypsies and Travellers not involved in unauthorised development of sites). This is examined in Chapter 4 below when dealing with issues of allocating pitch requirements between LPAs in a region.</p>
<i>Implications</i>	
	<p>Ignoring net migration would probably have the effect of under-estimating pitch requirements in the south of England and especially in the area around Greater London.</p>
<i>Possible adjustments</i>	
	<p>We suggest that RPBs look critically at the way net migration into/out of the study area is treated in local GTAAs and whether the conclusions reached and assumptions made seem reasonable. If the issue is not dealt with at all, it might be fair to regard resulting pitch requirements as likely to be an under-estimate in areas offering employment opportunities and especially those experiencing relatively high rates of growth in caravan numbers in the past. If other elements in the GTAA also suggest possible under-estimation, it might be appropriate to adjust the whole assessment as in Step 3 rather than attempt an adjustment for this element alone.</p>

Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?***The Issue***

Pitch requirements are to be based on need rather than aspirations. However, accommodation aspirations are important in considering sustainability of site provision – in the longer term, if current extreme pitch shortage is redressed, provision which does not meet expectations and aspirations may be rejected. Even in the short term, it is clear that Gypsies and Travellers sometimes prefer to live on the roadside than to move to/stay on sites which are unsuitable for some reason or to move to bricks and mortar accommodation. Site provision must be attractive to Gypsies and Travellers if the objective of reducing tension between Travelling and settled communities stemming from unauthorised development and encampment is to be achieved.

A particular problem faced in GTAAs when seeking to distinguish between ‘need’ and ‘demand’ is assessment of affordability. In mainstream housing assessments it is usual to distinguish requirements for ‘affordable’ or social housing from requirements for households who can afford to meet their own needs in the open market. Many GTAAs do not ask for any income information. This is often a response to advice that such questions would not be answered and could jeopardise the success of the survey altogether. Where questions are included, responses are rarely analysed suggesting that the data are not good. Some assessments compromise with, for example, questions about whether the respondent could afford to buy land and develop a site – leaving aside issues of land values and so on. It is also arguable that there is no ‘open market’ for Gypsy and Traveller sites since any new provision is entirely dependent on planning consents.

The review of GTAAs shows that demand issues and aspirations are not always addressed. Some of the relevant issues are:

- Evidence consistently suggests that many Gypsies and Travellers prefer family-owned private sites. Provision which ignores this may run the risk of continuing unauthorised development of such sites anyway. However, as noted above, it is rarely clear how many families could actually afford to make their own provision.
- Evidence also is consistent about expressed preferences for small (up to say fifteen pitch) sites where there is less scope for inter-family conflict and problems.

Implications

Failure to take account of accommodation wishes and aspiration will not necessarily lead to either an over- or under-estimation of pitch requirements. It will, however, provide a less useful guide to the nature of provision required and implementation.

Possible adjustments

We suggest that RPBs include this element in their benchmarking of GTAAs to gather information which may be useful to them in making decisions about the allocation of pitch requirements between LPAs, and potentially in considering whether they should include in the RSS any guidance on principles to be taken into account in the preparation of LDPs (see Chapter 5).

Q10: Are any other factors taken into account on the need/demand side of the model?	
<i>The Issue</i>	
	<p>There are two categories of other factors which might be included:</p> <ul style="list-style-type: none"> • Mainstream assessments usually take into account needs arising from, for example, poor housing conditions or health needs requiring some form of adaptation or specially designed accommodation. Some GTAAAs include comments on such matters, but these rarely affect the calculations for pitch requirements. • Some studies use other sources of information to assess needs. A minority of GTAAAs include site waiting lists as an element of need. As in mainstream housing there are questions about lists being out-of-date or otherwise inaccurate. However, an important issue is the scope for double-counting which use of site waiting lists can introduce. For example, the same family could be on waiting lists for sites in different authorities or even different parts of the country (common waiting lists within a geographical area might help here in the longer term). Again, if waiting lists are used in addition to estimates for concealed households, movement from housing or movement from outside the study area there is scope for double-counting unless carefully controlled.
<i>Implications</i>	
	<p>Where site waiting lists are used as an element in quantitative needs assessment, RPBs should examine carefully whether there is scope for double-counting with other elements in the assessment. Where double-counting could arise, the assessment could obviously over-state requirements.</p>
<i>Possible adjustments</i>	
	<p>Where waiting lists seem likely to double-count elements of need already included from some other source or assumption, and the contribution to overall requirements from this source is significant, RPBs might consider reducing one or other element. The extent of reduction can probably only be determined in particular cases and is likely to be arbitrary.</p>

Q11: What assumptions are made about supply of pitches over the assessment period?***The Issue***

So far, all questions examined have dealt with the demand/need for site places, but an assessment model must also incorporate assumptions about the supply of pitches over the assessment period. Supply can come from:

- Currently vacant pitches which will be occupied during the assessment period.
- Any sites/pitches currently programmed.
- Any unauthorised developments likely to be granted planning permission in the assessment period.
- Any sites found by Gypsies and Travellers granted planning permission in the assessment period.
- Any pitches vacated by people moving to housing.
- Any pitches vacated by people moving out of the study area.
- Pitches vacated in other ways, for example by death of a sole occupier.

Some GTAAs attempt to itemise and estimate each element. Others use records of pitch turnover on council sites to estimate pitches likely to become vacant over the plan period to cover the last three elements. Many GTAAs make zero assumptions on the supply of pitches from programmed sites or new planning permissions although this could obviously change in future.

One potential danger is where studies use pitch vacation rates from council sites and apply them across all authorised sites. Very little is known about pitch turnover on private sites although some sites with rented pitches are known to have high turnover rates. Vacancies as such are unlikely to arise on owner-occupied family sites and, where permissions are personal to an individual or family, pitches/sites would not be available to others were the occupiers to die or move. The nature of authorised sites in a study area is important when making assumptions about likely pitch vacancies, but such information is not always available in GTAA reports.

Implications

A study which ignores a potential flow of vacancies from existing authorised sites will tend to over-estimate pitch requirements (this is not the same as a study which examines past turnover rates and applies a zero assumption on this basis).

A study which looks at pitch vacation rates, **and** also at likely movement to houses or out of the area (or at net flows) could over-state likely vacancies and thus under-estimate pitch requirements.

A study which identifies desire/plans to move from site accommodation and then assumes a similar number of vacancies will be created in each year of the assessment period will probably over-state vacancies and thus under-estimate requirements. It is unlikely that all movement plans will be put into action in a single year.

Possible adjustments

RPBs should look critically at assumptions made about the supply of pitches in the assessment period. There are no easy rules of thumb to be applied.

If the RPB is aware of any recent changes affecting supply, for example an unexpected planning permission granted on an unauthorised development, it would be legitimate to deduct the pitches involved from estimated requirements.

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?	
<i>The Issue</i>	
	In a sense this question provides the opportunity to bring together all the previous questions/ answers from the benchmarking and decide whether adjustments should be made.
<i>Implications</i>	
	<p>There are different possible outcomes of benchmarking:</p> <ul style="list-style-type: none"> • No significant weaknesses are revealed. • Either a combination of factors, or one single important factor tends consistently to under-estimate requirements. • Either a combination of factors, or one single important factor tends consistently to over-estimate requirements. • Factors are identified which seem likely to both over- and under-estimate requirements.
<i>Possible adjustments</i>	
	<p>In the first and last scenario above, RPBs can use the findings of the GTAA without adjustment with some confidence. Where the GTAA seems likely to consistently either over- or under-estimate requirements a judgement is required whether:</p> <ul style="list-style-type: none"> • The effect is likely to be so small that it can be ignored. • The effect is significant but accuracy could be improved by adjusting one element where we have provided a rule of thumb above. • The effect is significant and the overall GTAA is so flawed, or individual adjustments are not possible, that it is advisable to adjust figures wholesale as set out in Step 3 below. <p>The decision calls for individual judgement on the basis of critical examination of the issues, and it is not possible to provide any standard guidance.</p>

Step 3: Filling Gaps and Assessing Regional Pitch Requirements

There are two circumstances in which it might be necessary for RPBs to make their own assessment of pitch requirements:

- Where parts of the region are not covered by a GTAA.
- Where benchmarking suggests that a GTAA is likely to be very inaccurate.

In such circumstances we suggest that RPBs should apply a simple formula to calculate pitch requirements until reliable GTAA information is available. This is set out below. The output of Step 3 is a regional estimate of pitch requirements.

The adjustment formula

In the course of the research we benchmarked and looked in detail at GTAA's prepared for the East of England. This was the basis for seeking to develop a simple formula, based on the Caravan Counts as the only source of information publicly available, which could be applied as a proxy assessment. The aim was to see whether there was an observable relationship, which could also be supported and justified by logical argument, between any elements of the Counts and pitch requirements emerging from 'reliable' GTAA's. The result was as follows.

First we assumed that pitch requirements at full GTAA level (in most instances involving more than one LPA) should include all unauthorised development in the area. This element of requirement is treated separately because unauthorised development is currently a very patchy phenomenon and much more significant in some areas than others. The Counts record caravans rather than pitches. To translate to pitches, caravan numbers are divided by 1.7. This figure is used because GTAA's reviewed found the average number of caravans per pitch to be somewhere around 1.7.

Second, we assumed that other pitch requirements will be related in some way to the number of authorised pitches in the study area. This is mainly because an important element in pitch requirements is overcrowding/doubling up on existing sites and family growth from those sites. If, as many studies assume in the absence of hard evidence, the number of Gypsies and Travellers in housing roughly equates with the number living in caravans, again there is some logic in seeking a relationship with site places. Again 1.7 is used to convert caravans in the Count to pitches.

Third we checked what relationship between pitch requirements and authorised pitches actually emerged in five GTAA's completed by different consultants and using different methods. The results are shown in Table 3.2. The second column presents assessed pitch requirements minus estimated unauthorised development pitches as a percentage of authorised pitch provision. As can be seen, percentages range from 74 per cent to just 15 per cent. The third column presents comments from the benchmarking of each GTAA. As can be seen, there are reasons for supposing that the study where assessed requirements minus unauthorised development pitches (Counts) represented about 40 per cent of current authorised pitch provision (Counts) is reliable. The study which produced a higher requirement can be argued to be an over-estimate, and there are valid reasons for supposing that the three studies which give lower proportions are under-estimates.

On the basis of this analysis we felt justified in suggesting that the formula for filling gaps in GTAA assessments should be:

Pitch requirement for an area equals the number of unauthorised development pitches in the area plus 40 per cent of the number of authorised pitches in the area

Table 3.2: Assessment of Relationships between Current Authorised Pitch Provision and Requirements in GTAA's Reviewed		
GTAA	Requirement in GTAA minus unauthorised development pitches from Count, as a percentage of authorised pitches from Count (percentage)	Comments
Study 1	74	This study allows for concealed households and future family growth and all unauthorised developments. It also makes use of site waiting lists which represent a significant proportion of requirements. There could be some internal double-counting, and certainly some possible double-counting with other areas. This study may over-estimate requirements.
Study 2	43	This study includes households on unauthorised sites, a 10 per cent allowance for overcrowding and concealed families, 5 per cent net movement to sites from houses and 3 per cent per annum future family growth. It is based on robust survey information and there is no obvious reason to doubt its reliability.
Study 3	29	This study assumes 3 per cent family growth. There is no allowance for concealed households or overcrowding for current backlog. It uses site waiting lists to allow for desired movement into the area, but not for family growth. It does not allow for the (modest) unauthorised developments in the study area. Overall, this study is likely to under-estimate requirements.
Study 4	24	The need/demand side of this study seems reasonable. Supply side calculations assume a significant supply of pitches through outward movement to housing and outside the study area despite evidence presented which shows that pitch turnover has been extremely low in recent years. Overall, this study is likely to under-estimate requirements.
Study 5	15	Effectively no allowance is made for current pitch shortfall other than unauthorised development. The same population/household growth rate is applied for Gypsies and Travellers as for the settled community despite evidence suggesting that household growth is more rapid among Gypsies and Travellers. Overall, this study is likely to significantly under-estimate requirements.

Or in symbols:

$R = UDP + 0.4AP$ <p>Where:</p> <p>R = the pitch requirement</p> <p>UDP = the number of pitches in unauthorised developments calculated by Count caravans on unauthorised sites on Gypsy-owned land divided by 1.7</p> <p>AP = the number of authorised pitches calculated by Count caravans on authorised social rented and private sites divided by 1.7</p>
--

This formula can, of course, be criticised. It is essentially pragmatic and devised for its simplicity rather than its sophistication. However, it should provide a reasonable estimate of pitch requirements, based on current good practice.

By expressing requirements from all factors other than unauthorised development as a percentage of current authorised pitches, the formula essentially conflates the different elements in need and supply into a single composite figure. It thus represents current shortage and concealed households, future household growth, net movement between sites and houses, net movement into and out of the study area, an allowance for need from unauthorised encampment and supply factors. It follows that it would be unwise to apply the formula in areas with very unusual characteristics, for example:

- In some highly urban areas where most Gypsies and Travellers live in housing but may still need site accommodation.
- In areas where unauthorised encampment is predominantly an indication of need for permanent rather than temporary accommodation.
- Where there are unusually high proportions of New Travellers who generally have smaller families and lower household formation rates.

Applying the formula

An example of the output of Step 1 of the tool for an imaginary region was presented above (see page 13). The same example is used to illustrate how the formula would be applied.

There are four GTAA's in the example region: North Exshire, Beeton, Wyeshire and Zedshire. Ceecaster has no GTAA at present. The RPB has benchmarked the GTAA's and come to the following broad conclusions:

- **North Exshire:** This is an extremely competent and apparently high quality GTAA carried out in-house by the local authorities. It is survey based; almost all local Gypsy and Travellers were interviewed using a comprehensive questionnaire which collected quantitative information and also qualitative information on local site conditions and residents' health needs which will assist the Supporting People Team devise services for Travellers. All elements of need are included and supply assumptions reflect recent pitch turnover and firm movement intentions. There is no reason to doubt the robustness of the assessment of requirements.

- **Beeton:** This GTAA was also carried out by officers, but there are rumours (which have reached the ears of the RPB) that some sites were missed. Beeton is widely thought to have consistently under-counted caravans on unauthorised encampments for years. The model used in the GTAA ignores current unauthorised development (enforcement is in progress), and all indications of current shortage of pitches or desire to move from houses. It applies a 3 per cent family growth rate to authorised pitch numbers. The RPB concludes that the GTAA is likely to under-estimate requirements quite significantly.

- **Wyeshire and Arehampton:** This GTAA was carried out by consultants who have since been responsible for several other GTAAs across the country. It was carried out before the Draft practice guidance was issued. The model used here takes account of the (limited) unauthorised development in the study area, but also implicitly assumes that all unauthorised encampments indicate need for residential pitches despite the fact that Eyeport has ferry services which Gypsies and Traveller regularly use and which generates some encampments on approach routes in the county. Current shortage of pitches from concealed households is taken into account, as is net movement between houses and sites and net movement between the county and elsewhere. The model seems likely to overstate need for residential pitches. However, the supply assumptions also seem likely to overstate supply: at the time of the survey a large local authority site was vacant for refurbishment and its pitches were counted on the supply side. In the course of the refurbishment serious contamination of the land was discovered and re-instatement is prohibitively expensive. Two private Gypsy and Traveller sites in the county have recently switched to providing park homes for the settled community and their former residents have been displaced. The RPB in its review of the GTAA assumed that over- and under estimates might balance out.

- **Zedshire:** This GTAA was also carried out by consultants. It was completed after the *Draft practice guidance* was issued but took an independent approach. Benchmarking suggests that the GTAA is likely to over-estimate requirements:
 - Site waiting lists are used in their entirety in addition to estimates for overcrowding, family growth and inward migration.
 - A small number of housed Travellers were interviewed known to site managers. Three-quarters said they would prefer to live on a site, and this proportion has been applied to an estimated housed Gypsy and Traveller population. No allowance is made for any movement from sites to houses.
 - Unauthorised encampments and developments are assumed to generate need for residential pitches.
 - No allowance is made in the supply estimate for site turnover.

The RPB therefore intends to use the formula to estimate requirements for the missing Ceecaster and to adjust for over- and under-estimates in the Beeton and Zedshire GTAAs. Table 3.3 shows the results of applying the formula to provide estimated requirements for Beeton and Ceecaster in Exshire and adjusted requirements in Zedshire.

Table 3.3 : Estimated Pitch Requirements for Example Region

GTAA and/or county	From count		Estimated on basis of count		Applying formula	From GTAA
	Caravans on authorised sites	Caravans on unauthorised developments	Pitches on authorised sites	Pitches on unauthorised developments		
North Exshire	153	10	90	6	42	40
Beeton	320	45	188	26	102	30
Ceecaster	410	77	241	45	142	NA
Beeton & Ceecaster	730	122	429	72	244	
Exshire	883	132	519	78	285	NA
Wyeshire + Arehampton	625	17	368	10	157	160
Zedshire	951	60	560	35	259	550

Column 1 lists the GTAA and/or County. Part of Exshire is covered by the North Exshire GTAA, part by the Beeton GTAA. Ceecaster has no GTAA.

Columns 2 & 3 are taken from the Example of output from Step 1 on page 10 and come directly from the Caravan Counts.

Columns 4 & 5 translate these caravan numbers to pitches by dividing by 1.7 and rounding to the nearest whole number.

Column 6 shows the result of applying the formula Requirement = UDP + 0.4AP.

Column 7 is the residential pitch requirement assessed in the GTAA, extracted from the example on page 13.

Calculating regional pitch requirements

Regional pitch requirements are calculated by simply summing the requirements from GTAAs and any inserted/adjusted by the formula.

In the example, regional pitch requirement is:

North Exshire	40 (as assessed in the GTAA)
Beeton & Ceecaster	244 (calculated by formula)
Wyeshire & Arehampton	160 (as assessed in GTAA)
Zedshire	259 (calculated by formula)
Total	703

3.3. Longer-term assessments

Most GTAAs have an assessment period of five years. A five year assessment period is implicit in the formula suggested above. There are two reasons for this:

- There is a current shortage of pitches in most areas which is acute. Shortage is reflected in unauthorised developments and encampments as well as in doubled-up households on authorised sites and families effectively forced into housing because there is no realistic alternative. If community tensions caused by unauthorised sites are to be mitigated, new site provision is urgent. Action is needed within the next five years to reduce the current backlog of supply.
- The current shortage means that it is impossible to predict trends when sites are provided and shortage is reduced. There is no means of knowing whether Gypsies and Travellers will, for example, seek to form smaller independent households, move from houses to sites or move/travel more if accommodation is available. There is effectively no basis on which long-term predictions and assessments could be made.

RPBs are, however, seeking to plan in the RSS for a twenty year period and need some indications of the sorts of pitch requirement assumptions they might make.

At present, the best assumption to be made for a period when the current backlog of site need has been cleared is **household growth rate of 3 per cent a year compound**⁷. This would give an indication of long-term requirements and would counter any perception that Gypsy and Traveller need can be met on a once-and-for-all basis in a way that is not assumed for the settled community. Household growth should be monitored in order to form improved assumptions for the future.

⁷ Household growth rates of 2 per cent and 3 per cent a year were suggested as appropriate in Pat Niner, Local Authority Gypsy/Traveller Sites in England, ODPM, 2003. In the Republic of Ireland a report noted that the 4 per cent family growth rate assumed by the Task Force on the Travelling Community had proved very accurate between 1997 and 2004 (Review of the Operation of the Housing (Traveller Accommodation) Act 1998. Report by the National Traveller Accommodation Consultative Committee to the Minister for Housing and Urban Renewal, 2004). Given the differences between Irish Travellers and other Gypsy and Traveller groups in England, a 3 per cent assumption is reasonable.

Chapter 4: Allocating Pitch Requirements between Local Planning Authorities

ODPM Circular 01/2006 says that RSS revisions should identify the number of pitches required (but not their location) for each LPA *‘in the light of the GTAAs and a strategic view of needs across the region’* (paragraph 23). In this identification process, RPBs will have the benefit of advice from strategic authorities (under s4(4) of the Planning and Compulsory Purchase Act 2004) and will produce options to be examined through public consultation and the Sustainability Appraisal. This chapter aims to help RPBs in the task of making pitch allocations in the light of GTAAs and a strategic view of needs.

The tool offers three further Steps:

Step 4: Stock-taking information at LPA level

Step 5: Filling gaps at LPA level

Step 6: Considering principles which influence a ‘strategic view of needs’

4.1 Step 4 : Stock-taking information at LPA level

Basic information for this Step was assembled at Step 1 where RPBs examined and recorded as much detail as possible on pitch requirements from local GTAAs, including any allocations to LPAs. Our review suggests that many of the early GTAAs produced before the *Draft practice guidance* was issued cover several authorities but do not break pitch requirements down between LPAs, so the stock-taking is likely to identify a number of gaps (see Step 5).

The other task in this Step is to examine the basis on which any allocation of pitch requirements between LPAs is made in joint GTAAs. Our review showed that methods are not always fully explained. The objective here is to identify which broad approach has been used:

- Some GTAAs explicitly say that the breakdown of pitch requirements between LPAs is made solely on the basis of **where the need arises**. Such an approach inevitably tends to reinforce current provision patterns since the distribution of the Gypsy and Traveller population – often patchy across a county or sub-region – determines where future need arises.
- Some GTAAs attempt to make adjustments to the pattern of need where it arises by, for example, boosting requirements in some LPAs on the basis of locational preferences expressed in the survey. GTAAs not reviewed may make other adjustments which move towards a clearer assessment of assessing requirements where they should be met.

This distinction is significant since it is arguable that GTAAs which take the second approach have already started to take a more strategic view of the location of pitch requirements. Moreover, where authorities have accepted and adopted the pitch distribution, there is some local commitment to the distribution proposed. We believe that RPBs should, when taking a strategic view of regional needs, give more weight to pitch allocations between LPAs in GTAAs which take into account factors other than solely the pattern of need as it arises.

4.2 Step 5: Filling gaps at LPA level

The purpose of this Step is to provide information on the basis of which RPBs can consider pitch allocation options. This should comprise:

- Information from GTAA's where available, adjusted where appropriate to the revised GTAA requirement total reached in Step 3, indicating those distributions which are not based solely on the pattern of need where it arises.
- Where there is no breakdown of pitch requirements in the GTAA, a figure calculated by the RPB based solely on the pattern of need where it arises.

The following table indicates the approach to be taken in establishing base figures according to how the LPA pitch requirements have been established.

Scenario 1. LPAs covered by a GTAA which makes pitch allocations based on need where it arises. No adjustment has been made at Step 3.	
	LPA pitch requirements from the GTAA are used.
Scenario 2. LPAs covered by a GTAA which makes pitch allocations based on need where it arises. Adjustment has been made at Step 3.	
	LPA pitch requirements from the GTAA are adjusted upward or downward as appropriate so that LPAs still take the same share of total requirements. For example, four LPAs covered by a GTAA had pitch requirements initially assessed as 20, 40, 40 and 100 in the total requirement of 200. The Step 3 adjustment reduced total requirements to 150. The LPAs will now have requirements of 15, 30, 30 and 75.
Scenario 3. LPAs covered by a GTAA which makes pitch allocations between LPAs on the basis of where needs should be met. No adjustment has been made at Step 3.	
	LPA pitch requirements from the GTAA are used with an indication that the figures are not on a 'need-arising' basis.
Scenario 4. LPAs covered by a GTAA which makes pitch allocations between LPAs on the basis of where needs should be met. Adjustment has been made at Step 3.	
	LPA pitch requirements from the GTAA are adjusted upward or downward as appropriate so that LPAs still take the same share of total requirements. Figures are distinguished to indicate that they are not derived on a 'need-arising' basis
Scenario 5. LPAs covered by a GTAA which does not break down requirements between LPAs	
	LPA figures are estimated on a 'need-arising' basis using the formula Requirement = $UDP + 0.4AP$ described in Step 3 above.
Scenario 6. LPAs covered by a GTAA which covers that area only.	
	GTAA figures are used, adjusted as at Step 3 if necessary as a result of the GTAA benchmarking process in Step 2.

Table 4.1 shows the results of the process outlined above for the example imaginary region first introduced in Step 1. This shows that:

- The North Exshire GTAA is adopted unchanged for the allocation to LPAs. Examination of the GTAA shows that the allocation has explicitly considered where need should be met rather than relying solely on where it arises. This is indicated with an asterisk.

- Beeton and Ceecaster have been calculated independently using the formula. Ceecaster has no GTAA, and benchmarking suggested that the Beeton GTAA underestimated requirements.
- Benchmarking suggested that the Wyeshire and Arehampton GTAA was robust. It did not allocate requirements between LPAs so estimates have been derived using the formula with slight rounding adjustment to the total for the GTAA.
- Benchmarking suggested the Zedshire GTAA over-estimated requirements. The breakdown of requirements between LPAs in the GTAA was on the basis of where needs arise. The estimated distribution of pitches divides the adjusted total requirement (259) between LPAs in the proportions from the GTAA itself.

A table of this sort is the expected output of Step 5. Figures in the example have been kept un-rounded for clarity of calculation. In practice it would be appropriate to round to the nearest five pitches. On this basis, the distribution of pitch requirements (705 in all) which would act as base for strategic consideration in the example region would be:

Aville	30*	Eyeport	20
Beeton	100	Arehampton	20
Ceecaster	140	Jaychester	35
Deeminster	10*	Kaymouth	20
Eefield	0	Elletown	70
Efferton	50	Emmemmy	0
Geeborough	55	Ennerby	135
Aitcham	20		

Asterisks indicate where LPA allocations are not purely on a 'need-arising' basis.

Table 4.1: Estimating LPA Pitch Requirements in Example Region						
LPA and county	GTANA	Residential pitch need assessed	Caravans on authorised sites	Caravans on unauthorised developments	Estimated distribution of pitches to LPA	Derivation
Avile	North Exshire	30	110	0	30*	From GTAA; takes account of where need should be met
Deeminster	North Exshire	10	43	10	10*	
North Exshire		40	153	10	40	
Beeton	Beeton	50	320	45	102	Calculated by formula
Ceecaster	NA	NA	410	77	142	Calculated by formula
Eefield	Wyeshire	NA	0	0	0	
Efferton	Wyeshire	NA	210	0	51	
Geeborough	Wyeshire	NA	200	10	54	Calculated by formula
Aitcham	Wyeshire	NA	75	0	18	controlled to GTAA total
Eyeport	Wyeshire	NA	60	7	18	
Arehampton (unitary)	Wyeshire	NA	80	0	19	
Wyeshire + Arehampton		160	625	17	160	
Jaychester	Zedshire	70	120	0	33	
Kaymouth	Zedshire	40	75	0	19	GTAA allocation pattern
Elletown	Zedshire	150	231	30	71	between LPAs controlled to total set by formula in Step 3
Emmemmy	Zedshire	0	0	0	0	
Ennerby	Zedshire	290	525	30	136	
Zedshire		550	951	60	259	

Steps 4 and 5 are purely preliminary, aimed at providing RPBs with the basic material from which they can explore pitch allocation options from a strategic regional viewpoint. The objective of Step 6 is, effectively, to amend the figures which result from Step 5 to reflect positive strategic directions rather than the unplanned outcome of a ‘need as it arises’ approach.

4.3 Step 6: Considering a ‘strategic view of needs across the region’

In Step 6 RPBs need to generate pitch allocation options for consultation and sustainability appraisal before the preferred option is incorporated into the draft RSS. At this stage of the process there is no ‘technical’ answer based only on the needs or preferences of Gypsies and Travellers. These must be considered in a wider context so as to achieve a sustainable outcome which balances the needs of all communities within general planning principles. The RSS proposals must also be capable of implementation, which means they must be politically acceptable. This is the role, and challenge, facing the RPBs when considering requirements for Gypsy and Traveller caravan sites. In order to support RPBs in this role, we outline some basic planning principles and, on the basis of our research, comment on how they might relate to decisions about how pitch requirements might be allocated between LPAs. We then outline a sequence of questions RPBs might consider in order to structure their challenging task of generating pitch allocation options.

Basic planning themes and pitch allocations between LPAs

As noted above, Step 6 is the stage where planning and other wider considerations must be taken into account in allocating pitches between LPAs. Here we look at five basic planning principles which might bear upon deliberations about pitch allocations. These are: sustainability, equity and choice, social inclusion, environmental protection, and the need for flexibility of provision.

Sustainability

RSSs have a statutory objective to contribute to the achievement of sustainable development. Thus sustainability of site provision must be a primary consideration. Sustainability has economic, social and environmental dimensions and these are discussed separately below.

The objective of the planning system in this context is to allocate land for sites which will be developed over twenty to thirty years. It is essential that those sites should cater for Gypsy and Traveller needs and expectations, not settled community or political expediency and convenience. It is arguable that the latter considerations led to the poor conditions and environment of many sites in the existing network. If land allocated for sites is in the ‘wrong’ place, or sites developed are inappropriate, then Gypsies and Travellers will not go to live there or will not stay. It probably follows that Gypsy and Traveller sites will be competing with other land-uses – such as mainstream affordable housing, industry or open space – which might be more generally acceptable to the settled community.

This factor will be felt more when LPAs come to allocate land for Gypsy and Traveller sites in their LDPs. At regional level, there are perhaps three implications:

- Any land considered, on general planning grounds, to be suitable for residential use should also be considered suitable for development as a Gypsy and Traveller site

since sites are a form of residential development (most sites seem to be exclusively residential although some include work areas). Claims of shortage of land, while there is land available for other residential development, should not rule an LPA out so far as site provision is concerned if other criteria for site development can be met there.

- There is a limit – but one which is currently hard to set – as to how arbitrary site allocation can be. Arbitrary allocations could result in sites not being taken up, and unauthorised developments and encampments continuing in the areas where Gypsies and Travellers really want/need to live.
- Sustainable site provision should seek to meet realistic aspirations of Gypsies and Travellers as well as their ‘needs’ in an abstract sense.

Equity and choice

The issue at the heart of regional strategic allocation of pitches is that most requirements appear to be generated by current provision. Family growth, site waiting lists and overcrowding on existing sites all tend to reinforce present provision patterns because need is directly generated from existing sites. There are different strong arguments for seeking to diversify provision beyond areas of current provision:

- Gypsies and Travellers looking for authorised site accommodation currently have severely constrained choices. For example, while some form of social housing is available in every local authority, there is no social rented site in 138 of the 353 local authorities in England, and only in 71 authorities is there more than one site. There are local authority areas in England with no site provision, public or private, for Gypsies and Travellers.
- Councils that have already made site provision are entitled to expect that, in this shared responsibility, every authority – and particularly those that neighbour high concentrations of Gypsies and Travellers – should make a contribution to future site provision.

The strategic pitch allocation process provides an opportunity to achieve a wider spread of authorised site provision.

How much wider is a more difficult question to answer. There are real and legitimate reasons for Gypsies and Travellers seeking to continue living on or near current sites, such as extended family links, provision of care to family members, and desire to maintain positive communities sharing cultural values and lifestyles.

There is a second aspect of equity and choice arguments. ‘Gypsies and Travellers’ are a highly diverse group made up of people with very different cultures who share a preference for living in caravans. Different families have different needs and aspirations. There is probably as much diversity in accommodation needs and desires as in the settled communities, but within a much smaller population. It follows that a range of different types of accommodation – large sites and small sites, owner-occupied sites and rented sites, remote sites and urban sites – will be needed to meet requirements and provide a level of choice taken for granted by most of the settled community.

For RPBs this means that pitch allocations should be seen as capable of providing many different sorts of site in different locations. It would rarely be appropriate to see an allocation of 50 pitches as a single monolithic site. The composition of the local Gypsy and Traveller population would be one relevant consideration here.

Social inclusion

At present Gypsies and Travellers are among the most deprived and socially excluded groups, as evidenced by health and education statistics, and the general hostility and discrimination they often face. Sustainable development of sites implies fostering greater social inclusion for Gypsies and Travellers through the location of sites. Again this is a matter more directly relevant for LPAs in their land allocations for sites than for RPBs at RSS level. However, there are some more general principles to bear in mind: Gypsy and Traveller preferences, and access to employment opportunities, local services and the road network. The general conclusions from our research are that, for RPBs seeking to allocate pitch requirements beyond current areas of provision, positive search criteria would be: access to employment opportunities represented by major settlements; access to the major road network; and small and medium sized settlements where services could be provided/accessed from edge locations. These points are included in the framework of questions RPBs should consider when making pitch allocation decisions which is presented in next section.

Environmental protection

Environmental issues are likely to suggest areas where Gypsy and Traveller sites should not be developed. There are two different arguments:

- Some environments are such that they are unsuitable for residential occupation whether by Gypsies and Travellers or anyone else.
- There is a presumption against the development of Gypsy and Traveller sites, and other forms of development, in areas with positive environmental protection status and in areas of flood risk.

Again, these factors, generally constituting constraints, are further addressed in the following section.

Flexibility

Planning is a process involving planning, monitoring, managing and reviewing. Given the current imperfect level of understanding of Gypsy and Traveller accommodation needs, and the unknown extent to which site provision itself could transform needs and aspirations, monitoring and review is particularly essential in the context of planning for site provision.

There is another sense in which flexibility is appropriate in the context of planning for site provision. The Gypsy and Traveller population group is a fluid one, and responding to dynamism in terms of changing demographic trends and travelling patterns is crucial. A rigid approach to provision is therefore not suited to the task. Rather, a pragmatic one, which can respond to the fluidity of the population, is called for. There is a

strong argument for flexibility in provision. This includes potential site expansion to accommodate family growth and extended families, but also pitches large enough to accommodate visitors to relieve one source of unauthorised encampment.

For RPBs the implications point to encouraging varied rather than monolithic provision and accepting the current round of RSS reviews as a stage in the process rather than an end in itself.

Approaching pitch allocation to LPAs

Step 6 of the tool sets out a series of questions (presented in tabular form below) to help RPBs consider pitch allocation between LPAs in a systematic manner. It should be read in conjunction with the more general discussion of planning principles affecting site provision set out above.

We believe that systematically considering these questions will assist RPBs to generate pitch allocation options. The process will, of course, involve the exercise of professional judgement in the light of the particular circumstances and priorities of each region.

Q1: What is the scale of the issue to be addressed?	
<i>Background</i>	
	It is important, at the start of the process, for RPBs to get a sense of scale for the issue they are addressing. Output from Step 3 of the tool provided the total regional pitch requirement.
<i>Sub-questions</i>	
	<i>Q1.1: How much land in total might this involve?</i>
	The possible land-take is an important scaling consideration. Among other things it might clarify how significant constraints will be (other things being equal, finding a small piece of land should be easier than a large one). A very rough calculation might assume an average pitch size of 200m ² . This is a relatively generous average pitch size which would accommodate site roads and any incidental open space. It would allow flexible pitch use and meet rising need/aspirations for more space. Such an average pitch size means an assumed 50 pitches per hectare. In the imaginary region which has provided examples throughout the previous sections, the 705 pitch requirement equates to around 14 hectares.
	<i>Q1.2: How many sites might be involved?</i>
	Many Gypsies and Travellers favour small rather than large sites. This means sites of up to about 15 pitches, although some successful family sites are much smaller and some successful local authority and private sites are larger. Community is important on sites, and it seems harder to build cohesive communities on larger sites which are likely to house a wider range of unrelated families. Very small sites can leave residents feeling isolated and vulnerable. Assuming a 10 and 15 pitch average site size would provide a range for the number of sites from a given regional pitch requirement. In the imaginary example, the 705 pitch requirement would translate roughly to between 50 and 70 sites.
	<i>Q1.3: How does this compare with RSS residential allocations?</i>
	This question is not strictly relevant to the allocation process for pitches, but might be useful in illustrating the scale of the issue in relation to other RSS topics. In most instances, it is likely to be extremely modest whether expressed in terms of 'units' or land.

Q2: What is the geographical starting point?	
Background	
	Output from Step 5 provided a split of the regional pitch requirement between LPAs, mainly on a 'need where it arises' basis. This directly reflects the pattern of current authorised provision and unauthorised developments. The Caravan Count now requests location details for such sites and the Communities and Local Government Gypsy and Traveller Unit has started mapping the information. RPBs would find it useful, as a preliminary to making allocation decisions, to examine the current pattern of provision. Maps ideally would also include major roads, settlements and local authority boundaries.
Sub-questions	
	Q2.1: Does existing provision appear to form natural sub-regional groupings?
	As noted in the previous section, one of the likely tasks of the RPB when making pitch allocations is to consider a more even distribution of provision to enhance equity and choice. Sustainability arguments suggest that such dispersal would be more feasible over relatively short distances and within areas which might share broadly similar locational characteristics. Existing groupings may be seen as defining the core of the 'area of search'.
	Q2.2: Are there areas where clusters of provision in one LPA adjoin an area with no or little provision?
	Maps often show that current provision is very clustered. There are many examples where several sites are found within a small area, and where unauthorised and authorised developments are in close proximity. Equity considerations suggest that pitch requirements might be dispersed from LPAs with existing provision to those with little or no provision where feasible from other viewpoints. Detailed maps of clusters can identify the areas where possibilities for dispersal should be seriously examined.
Q3: What scope is there for 'dispersing' pitch requirement allocations beyond areas with concentrations of existing provision?	
Background	
	Given the current uneven distribution of site provision and need arising (mapped under Q2), this is likely to be the core question for RPBs when allocating pitches at LPA level. As noted in the general discussion in the previous section, there are sound reasons on grounds of equity and choice for creating wider geographical options for Gypsies and Travellers through pitch allocations to 'new' areas. The same discussion noted that there is currently no evidence to say what proportion of pitch requirement could be dispersed from where it arises. Nor is it possible to say with any great confidence over what sort of distance, or within what sort of area, requirements could be diverted. This is an area where current GTAAs are not particularly helpful, or indeed where previous recent experience can be drawn upon as a guide since most development has been unplanned. Against this background the following sub-questions are intended to be helpful rather than authoritative.

Sub-questions	
	Q3.1: Is there any indication of the extent of need/requirement which could be 'dispersed'?
	RPBs might start by looking at GTAA's for any indications they give on this question. Since GTAA's are based on local assessments they are likely to give a better picture than more distant regional assumptions. This is also an area where RPBs might specifically ask for local authority advice in the formal consultation process with strategic authorities under s4(4) of the Planning Act. Where the issue is not addressed in a GTAA or local advice is not available, RPBs will probably be forced to make some form of assumptions. One such assumption might be that priority should be given to families with a clear local connection. Alternatively a proportion – say between a quarter and a third – of the requirement arising in a particular LPA might be identified for re-distribution.
	Q3.2: Are there guidelines to determine the area over which requirement might be dispersed?
	Again, there is unlikely to be evidence unless it is provided in GTAA's (and some have attempted to discover locational preferences) and/or advice from local authorities. We think that: <ul style="list-style-type: none"> ● EITHER dispersion should be relatively modest in terms of distance and extent. For example, where an LPA with high need generated by current provision adjoins one with no site provision, some of the requirements might be 'diverted' to the adjoining area, especially if road links between the areas are good. This would enable existing community and family links to be maintained. Such possibilities might be identified from the maps at Q2. ● OR new areas of site provision should be positively planned, and should be sufficiently extensive to create a viable local community. A 'viable' community should probably be at least 15 pitches with the possibility of extension to accommodate extended family members and family growth in the future, and should be well supported. Planned 'new' communities should, of course, meet other positive criteria for sites including especially employment opportunities and good road access.
	Q3.3: Can alternative scenarios be devised for appraisal and consultation?
	Different approaches to dispersal of pitch requirement is an obvious area for generating options. Options would then be subject to sustainability appraisal and consultation. Views of both the settled community and of Gypsies and Travellers should be sought. In reaching the preferred option, the views of Gypsies and Travellers would be particularly important as indicating likely sustainability. To encourage the effective involvement of Gypsies and Travellers in the consultation process, the options must be stated in terms which Gypsies and Travellers understand and can see as genuinely relevant to their lives and choices.
	Q4: What are the positive factors for pitch allocations?
	Background
	The pitch allocation process must take account of other factors which may assist in determining the critical issue raised in Q3. A number of the planning principles identified in the previous section have positive implications in the sense of indicating the sorts of locations where site provision would be sustainable. Sustainability must be the primary consideration underlying pitch allocations. As noted above, sustainability is likely to result from a balance of meeting locational desires, needs for employment opportunities, site servicing and social inclusion and being accessible to transport routes.

Sub-questions	
	Q4.1 :Where do Gypsies and Travellers want to live?
	<p>Unfortunately, GTAAs have not been very successful to date in identifying where Gypsies and Travellers want to live, either in terms of geographical locations or types of area. It seems, not unnaturally, that individual preferences vary and that both predominantly urban and rural authorities can provide locations for sustainable sites.</p> <p>Many Gypsies and Traveller express a desire to live on the edge of small/medium towns or villages. This is partly to be near the countryside and party to achieve some separation from settled neighbours to reduce potential for conflict and preserve cultural identity.</p>
	Q4.2: Where are the main employment centres?
	The prime locational requirement for many Gypsies and Travellers is a market for their services – usually represented by concentrations of the settled community. Thus Gypsy and Traveller work opportunities are likely to be greatest in settlements where the settled communities live and work. Access to prosperous and growing areas will be as attractive to most Gypsies and Travellers as anyone else.
	Q4.3: Where are the main housing growth areas?
	As noted above, Gypsy and Traveller sites should be regarded as a form of residential provision. It is therefore appropriate to consider residential growth areas for the opportunities they provide for site development.
	Q4.4: Where is social inclusion best be fostered?
	There is a potential conflict between Gypsy and Traveller (and settled community) desires for sites to be somewhat distanced from existing settlements, and easy access to shops, schools and services. Isolated locations also run the risk of perpetuating social exclusion because there are few opportunities for Travelling and settled communities to mix and get to know each other – although forced direct proximity between communities can lead to tension rather than inclusion. Access and inclusion ‘sustainability’ criteria seem generally similar for Gypsies and Travellers and others. Very strict insistence on close access to services can lead to sites being refused as inappropriate development in existing settlements, so rather greater flexibility than normal may be required; Gypsies and Travellers are often prepared to travel a few miles to schools and shops if other requirements are met by a site location. At regional scale, the consideration argues against remote and isolated locations.
	Q4.5: Where are the main transport routes?
	Many Gypsy and Traveller occupations involve travelling to find work in different directions. In addition, many Gypsies and Travellers travel with a caravan or caravans for a period in the year. It follows that reasonable proximity to the major road network is important.
	Q5: What are the main constraints on site development?
	Background
	Planning principles also create a number of constraints on site development. Many of these are not absolute, but are still relevant when considering pitch allocation possibilities. Other things being equal, pitch allocations should avoid areas of constraint where there are feasible, sustainable alternatives. However, if the total pitch requirement in land terms is small – as is likely to be the case in most areas – few of these constraints are likely to rule out the possibility of site provision completely.

	Sub-questions
	Q5.1: Are there areas where Gypsies and Travellers do not want to live?
	Gypsies and Travellers are often extremely critical of existing sites where they are located adjacent to sewage works or refuse tips, or under electricity pylons or motorways. The fact that they continue to develop such sites and live there is a reflection of lack of alternatives rather than any indication of positive preference. Most Gypsies' and Travellers' preferences appear similar to those of the settled community for quiet locations and good environment.
	Q5.2: Where are the main existing built-up areas?
	Existing built-up areas are significant in different ways: <ul style="list-style-type: none"> • potential 'edge' locations are attractive (see above). • existing developed land is less likely to be available for sites, although there may be specific brown-field and regeneration opportunities. • some Gypsies and Travellers specifically say that they do not want to live within an existing settlement where potential for conflict with the settled community is greater. With sensitive planning Gypsy and Traveller sites can be successfully located within existing settlements and there is no reason to avoid LPAs on 'land shortage' grounds where land is available for residential development.
	Q5.3: Where are the main environmental protection areas?
	ODPM Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites refers to areas with nationally recognised environmental designations (Sites of Special Scientific Interest, National Nature Reserves, Conservation Area and so on). It says that permission for sites should only be granted where the objectives of the designation will not be compromised (paragraph 52). It may also be appropriate to avoid development of the highest quality and most versatile agricultural land. Other things being equal, these considerations might lead RPBs to allocate pitches to LPAs where such constraints are less. Again the scale of land involved makes it unlikely that environmental protection criteria will entirely rule out an LPA.
	Q5.4: Is Green Belt a relevant consideration?
	New Gypsy and Traveller sites are, as Circular 01/2006 makes clear, normally inappropriate development in the Green Belt. This is a potentially serious constraint for authorities with high existing needs and high scores on the positive criteria for attractive and sustainable sites. However, Circular 01/2006 also describes circumstances in which Green Belt boundaries can be altered. While RPBs may prefer not to allocate pitches to an LPA where almost all undeveloped land is Green Belt, this should not be seen as an absolute block on site development if there is no reasonable alternative. Failing to allocate land for sites could lead to continued unauthorised development in the Green Belt with all the consequent community tensions, and expense to Gypsies and Travellers and LPAs.
	Q5.5: Is flood risk a relevant consideration?
	Areas subject to flooding or where site development might increase flood risk should also be avoided for residential sites as for other forms of residential accommodation. Caravans used for permanent residential use are within the highly vulnerable category for flood risk (see <i>Planning Policy Statement 25 : Development and Flood Risk</i>). Again, it is unlikely that flood risk would entirely rule an LPA out of consideration.

Q6: What is the need for social and affordable site provision?	
Background	
	RSSs identify the requirement for affordable housing and allocate requirements between LPAs. A similar process is appropriate for pitch requirements and Gypsy and Traveller pitches count towards affordable housing allocations.
Sub-questions	
	Q6.1: What are the tenure preferences?
	It is clear that for many Gypsies and Travellers their accommodation ideal is an owner-occupied site owned by the (extended) family. This is, of course, identical with settled community majority aspirations to owner-occupation. For Gypsies and Travellers, ability to have some control over who else lives on the site and freedom to set their own lifestyle rules seem to be the main factors behind the desire for ownership. A major obstacle to achieving the ideal currently is the difficulty of getting planning permission. This should, if the new planning system works as intended, become easier. RPBs and LPAs should recognise the widespread aspiration to ownership since inappropriate site provision involving renting might not prevent continuing unauthorised development of sites. Pitch provision should usually include both social rented and privately owned sites.
	Q6.2: What is the requirement for local authority/RSL pitch provision?
	<p>This question is obviously important not only for RPBs but also for Regional Housing Boards when making decisions about resource allocation for social site development. Unfortunately there is no satisfactory answer at present. It is recognised that some Gypsies and Travellers will never be able to provide sites of their own, and some do not want to. Some Gypsies and Travellers say that they would prefer to rent a pitch from a local authority or RSL rather than another Gypsy or Traveller to whom they are not related. Demand for social sites probably depends greatly on the nature of the specific site, its condition, location and, importantly, who else lives there.</p> <p>There are three possible approaches for RPBs:</p> <ul style="list-style-type: none"> • Some GTAAs break down requirements between public and private site provision. Some use site waiting lists as an indication of need or present the information even if it is not used in quantitative assessments. This provides an indication of the scale of need for public provision. • RPBs might ask strategic authorities specifically for advice on this question. • Where neither source is available, RPBs might make an arbitrary assumption about the proportion of requirement which is for local authority/RSL provision. For example, they might apply proportions from other local GTAAs or a proportion calculated from the current split between public and private sites from the Counts. In making these assumptions it is important to bear in mind that requirement arising from unauthorised developments are unlikely to be satisfied by social site provision since the Gypsies and Travellers involved have clearly signalled a preference for ownership.

	<p>Q6.3: What is the requirement for private (affordable) pitch provision?</p>
	<p>Planning Policy Statement 3 : Housing makes a distinction between affordable and market housing in the mainstream housing market. A similar distinction might be made for privately-owned Gypsy and Traveller sites. However, there are special factors which make it almost impossible to identify what proportion of private site provision should be 'affordable' at present:</p> <ul style="list-style-type: none"> ● GTAAs have not been able to provide robust data on earnings and savings amongst Gypsies and Travellers. There is enormous cultural reluctance to provide such information (which might be very difficult to provide anyway given patterns of self- and casual-employment) and, as a consequence, many GTAAs do not attempt to collect the information. It is not, therefore, possible to make 'affordability' calculations for the Gypsy and Traveller population. ● Current private site development often appears to take place where there is relatively cheap land, sometimes because of planning constraints. Cheap land makes development affordable, even if there are then considerable costs in seeking planning permission. It is not yet clear what will happen to land prices if land is specifically allocated for Gypsy and Traveller site use, or how land for private development is to be brought forward under the new system. Until these points are clarified, land price, and thus the resources needed for purchase and site development, are unknown. <p>In this context, it might be appropriate for RPBs to treat all pitch requirements as requirement for affordable rather than market housing.</p>

Chapter 5: Transit Needs

The tool described in Chapters 3 and 4 concentrates on requirements for residential sites and pitches. This is a reflection of the current state of understanding of Gypsy and Traveller accommodation issues. Most GTAAs, perhaps in part because they accept the example calculation of need for residential site pitches from the Draft practice guidance (see Annex 1) as their ‘model’, concentrate primarily on residential pitch requirements.

However, nomadism and travelling – even if only to fairs or to visit family – is an important feature of Gypsy and Traveller identity and lifestyle. Some Gypsies and Travellers are still highly mobile without a permanent base, and others travel for significant parts of the year from a winter base. More Gypsies and Travellers might travel if it were possible to find places to stop without the threat of constant eviction. Culturally sensitive accommodation for Gypsies and Travellers must incorporate an element available for use while travelling and in an area for a short time.

The worst living conditions experienced by Gypsies and Travellers are commonly experienced on unauthorised encampments without easy access to water or toilet facilities and with difficulties in accessing education and health services. A further powerful argument for making some form of transit provision available is that unauthorised encampment leads to conflict between Travelling and settled communities. Managing unauthorised encampment is both costly and frustrating for local authorities and the police when there is nowhere the Gypsies and Travellers can legitimately move to.

Provision for transit/transient need must be considered in RSS reviews. In the short time available to the research, we have not been able to go into the same detail as for residential provision, but hope the following comments prove helpful to RPBs.

5.1. Basic information

Some GTAAs make an estimate of requirements for transit site or stopping place provision within their study areas. Such estimates are based on survey interviews with Gypsies and Travellers on unauthorised sites or temporarily in the area, and/or analyses of unauthorised encampment records, and/or analyses of the Caravan Count figures. Results vary considerable – at the extremes in some all those on the roadside or other unauthorised encampments are found to require residential accommodation in the area, while in others all families on unauthorised encampments are found to require transit accommodation.

GTAAs are the obvious starting point for RPBs in assessing requirements for transit accommodation. Where they provide no relevant information or where there is no GTAA at present, Caravan Count information can be used. Snapshot Count information is particularly suspect in relation to the dynamic processes represented by unauthorised encampment, however there may be no other source. Possible ways of using Count information are:

- Simply noting the number of caravans on unauthorised encampments and assuming that all or a proportion represent requirements for transit accommodation. One GTAA, for example, assumed that 50 per cent of caravans on unauthorised encampments required transit accommodation while the other 50 per cent required residential provision.

- Nationally, and in many areas, the number of caravans on unauthorised encampments are higher in July than in January reflecting a seasonal element in travelling. The difference between January and July figures might be assumed to represent requirement for accommodation for seasonal visitors, all of whom require transit accommodation.
- To counter the snapshot weakness, time-series Count information could be examined to see whether there are consistent trends which might affect provision decisions.

A final source of information is first-hand local knowledge of the region. Such knowledge might highlight locations where unauthorised encampments are common and problematic, or major regular cultural events (fairs, missions) likely to attract Gypsies and Travellers to the region for a short period.

5.2. Understanding unauthorised encampment

As noted elsewhere in this report, comparatively little is known about Gypsy and Traveller travelling, and stopping, patterns at present. This is a topic which would benefit from further research – although research would be inherently extremely difficult.

It is clear, however, that travelling and resulting unauthorised encampment are complex phenomena. There are commonly at least five components:

- Travelling is the constant lifestyle for a proportion of Gypsies and Travellers, or the lifestyle for others over extensive parts of the year. Such travelling appears to be predominantly work related. Accommodation requirements arise in/near the places where work is being carried out, and sometimes on the main routes between work places.
- There are a number of fairs and other events which attract numbers of Gypsies and Travellers, often on a regular basis. These include, for example, Appleby Fair in Cumbria and Stowe Fair in the Cotswolds. There are also a number of religious missions which attract Gypsies and Travellers or shrines which Gypsies and Travellers visit. Such events are normally known in advance. They generate accommodation needs while the event is in progress and temporary need in the area and on routes leading to it before and after.
- Fairs are one way in which Gypsies and Travellers confirm their identity and keep the culture alive. Family events (weddings, funerals) are also important in the Gypsy and Traveller culture, as is visiting family members in other parts of the country. Where such visits are made in caravans, a short-term accommodation requirement results. Major events are unpredictable, but this sort of social visiting is naturally more likely to generate accommodation needs in areas where numbers of Gypsies and Travellers live.
- Some Gypsies and Travellers travel in caravans for holidays, perhaps meeting up with other family members or friends at an agreed location. Insofar as Gypsies and Travellers cannot or do not access holiday caravan sites, this generates requirements in the destination area.

- As noted above, some Gypsies and Travellers travel and form unauthorised encampments simply because they have nowhere else to go. Some may be looking for a permanent site or a house. Residential site provision should reduce need for this form of temporary accommodation in the longer term.

Unfortunately, the relative proportions of each element are unknown, and are likely to vary widely in different areas. It is, however, important for RPBs to recognise the diversity and to try to identify the main elements in (parts of) their regions. Provision of an inappropriate form of transit/transient accommodation may fail to reduce unauthorised encampment.

5.3. Flexible options

In this context, it seems to us that there is advantage in building flexibility into accommodation provision wherever possible. There are two aspects:

- Larger pitches on residential sites provide the potential to meet the needs of short-term visitors.
- Variety in transit/transient provision is probably needed to cater for the variety of needs. This might range from formal transit sites, through stopping places with only basic services used on a regular basis, to temporary sites with temporary facilities available during an event or for part of the year.

It might be appropriate for the RSS to identify and broadly allocate a number of transit pitches where need is clearly established; a sub-regional perspective might be appropriate. Proximity to major routes will be an important locational criterion for such sites. Because Gypsies and Travellers will stay for a short period on transit sites, it is important that there is somewhere for them to move to. A single transit site makes little sense, and a network is needed to facilitate mobility and for the whole to function as intended.

5.4. A wider perspective

Travelling occurs at various scales including internationally. Provision of transit/transient accommodation is an area where RPBs need to work with adjoining regions to pool information and to ensure that proposals make sense in the wider context.

Annex 1: Example Calculation from ODPM Draft Practice Guidance on Gypsy and Traveller Needs Assessment

An estimate of need for residential site pitches: 2005 – 2010

For example, on the basis of need identified from a survey of Gypsies and Travellers in a local authority or partnership area, the following approach could apply.

a. Current residential supply (based on 1 pitch per household)

Current supply of occupied local authority residential site pitches in local authority/partnership area	300
Current supply of occupied authorised privately owned site pitches in local authority area/partnership area	200
Total Households	500
Number of unused local authority pitches, and vacancies on privately owned sites available in local authority/partnership area ⁽¹⁾	15
Number of existing pitches expected to become vacant in near future (L/A and privately owned) ⁽²⁾	5
Number of households in site accommodation expressing a desire to live in housing <i>[New local authority pitches already planned in year 1]</i>	3 10
<i>[Existing applications for private site development/extension likely to gain planning permission during year 1]</i>	20
Total pitch provision available	553

b. Current residential demand

Households	
– seeking permanent site accommodation in the area ⁽³⁾	12
– on unauthorised encampments	5
– on unauthorised developments for which planning permission is not expected	30
– currently overcrowded ⁽⁴⁾	15
– new households expected to arrive from elsewhere ⁽⁵⁾	5
i. new family formations expected to arise from within existing households ⁽⁶⁾	4
ii. in housing but with a need for site accommodation ⁽⁶⁾	2
Current shortfall	20 pitches
iii. family formation 2005 – 2010 = 88 households ⁽⁶⁾ thus extra pitch need 2005 – 2010	108 pitches

Notes

(1) Including closed local authority sites which could be brought back into use
 (2) As identified in the assessment of Gypsy and Traveller need
 (3) Based on waiting lists and results of survey
 (4) Overcrowding – eg 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
 (5) As identified in the survey, on a waiting list for site accommodation and trends from the ODPM Caravan count
 (6) 553 families @ 3% year on year for 5 years. Based on details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the ODPM Caravan Count (in this example 3.3% per annum)

Annex 2: Applying the Tool in the East of England: A Case Study Example

Stage 2 of the research on which this report is based, commissioned by the East of England Regional Assembly (EERA), was to apply the tool devised in Stage 1 of the research and outlined in Chapters 3 and 4 to the East of England. The primary purpose of this exercise was to assist EERA in the process of estimating regional pitch requirements and generating Options for pitch allocations between LPAs for consultation in late Spring 2007. However, it also provides a working example of how the tool is applied, acting as a 'case study exemplar' for other regions wishing to use the tool.

This Annex briefly sets out contextual points relating to the East of England in order to 'set the scene' before moving through each of the six Steps of the tool, as they apply to the East of England. Finally, transit needs in the Region are considered.

East of England context

The East of England is the Region which is most advanced in the process of producing an RSS Review for Gypsies and Travellers, and is also the Region with the highest Gypsy and Traveller population (in caravans) in England.

The planning process

The East of England Regional Assembly (EERA) is the Regional Planning Body with principal responsibility for the preparation of RSS Reviews. The current RSS is in the process of being revised. The *East of England Plan*⁸ is the draft revision to the RSS. It was approved by the Regional Assembly in November 2004, and subject to Examination in Public in November/December 2005 and January/March 2006.⁹ It is expected that the final RSS will be published by the Secretary of State in mid 2007.

EERA is currently undertaking a single issue review draft revision to the RSS to address the provision of Gypsy and Traveller caravan sites. This is in response to issues raised at the Examination in Public on the *East of England Plan* and acknowledgement by EERA of the inadequacies of the emerging RSS in this respect. The purpose of the revision is to bring the RSS into line with Government policy regarding sites, as expressed in ODPM Circular 01/2006 where reference is made to RSSs identifying pitch numbers and allocating requirements to LPAs.

A Project Plan and Statement of Public Participation for the Gypsy and Traveller revision was published in July 2006 with a consultation period closing 11 October 2006.¹⁰ The Project Plan comments that the RSS revision is likely to adopt a table-based format similar to that used for housing (numbers against LPAs and five year time periods), supported as appropriate by further policy guidance on location of sites, supporting text and background research material to inform the preparation of LDDs.

⁸ Available at: <http://www.eera.gov.uk/Documents/About%20EERA/Policy/Planning%20and%20Transport/PlanHome/RPG/RPG14/View%20the%20Plan/RSS14Finalversion.pdf>

⁹ Panel Report at: <http://www.eera.gov.uk/category.asp?cat=599>

¹⁰ <http://www.eera.gov.uk/Documents/Meetings%20and%20Events/Assembly%20and%20Panels/Gypsies%20and%20Travellers/Sustainability%20Appraisal/Scoping%20Report%20191006.pdf>

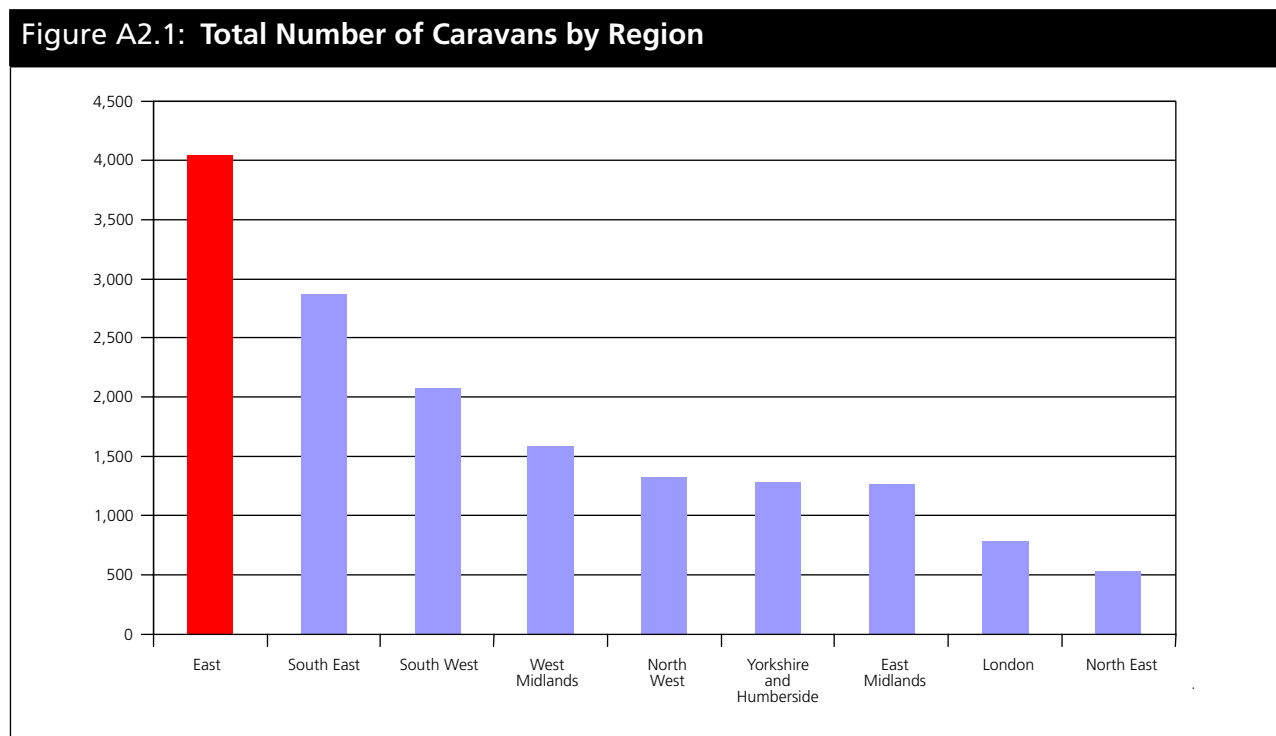
Consultants have been appointed to carry out the Sustainability Appraisal for the single issue review, and a Scoping Report has been published.¹¹

EERA has formally consulted Strategic Planning Authorities (county councils and unitary authorities) for their advice on various issues such as current levels of provision, need and future demand to help inform the review process. The responses received are being collated.

The time-line for the single issue review *Gypsies and Travellers* envisages consultation on Policy Options in late Spring 2007 and submission of the draft revision in early 2008. Consultation on the draft RSS would be in early Spring 2008 with an Examination in Public in the Autumn and the final published Review in Spring 2009.

Gypsy and Traveller caravan numbers

East of England has the highest number of caravans of any English region (see Figure A2.1). There were 4,044 Gypsy and Traveller caravans in the East of England at the January 2006 Count, representing 26 per cent of all caravans counted in England. In July 2006 the total was 3,889, representing 24 per cent of caravans across England.



In January 2006, the distribution of caravans in the East of England between types of site was as follows (with percentages for England in the brackets):

Social rented sites	1,370	34%	(42%)
Private sites	1,675	41%	(37%)
Unauthorised developments	851	21%	(14%)
Unauthorised encampments	148	4%	(7%)

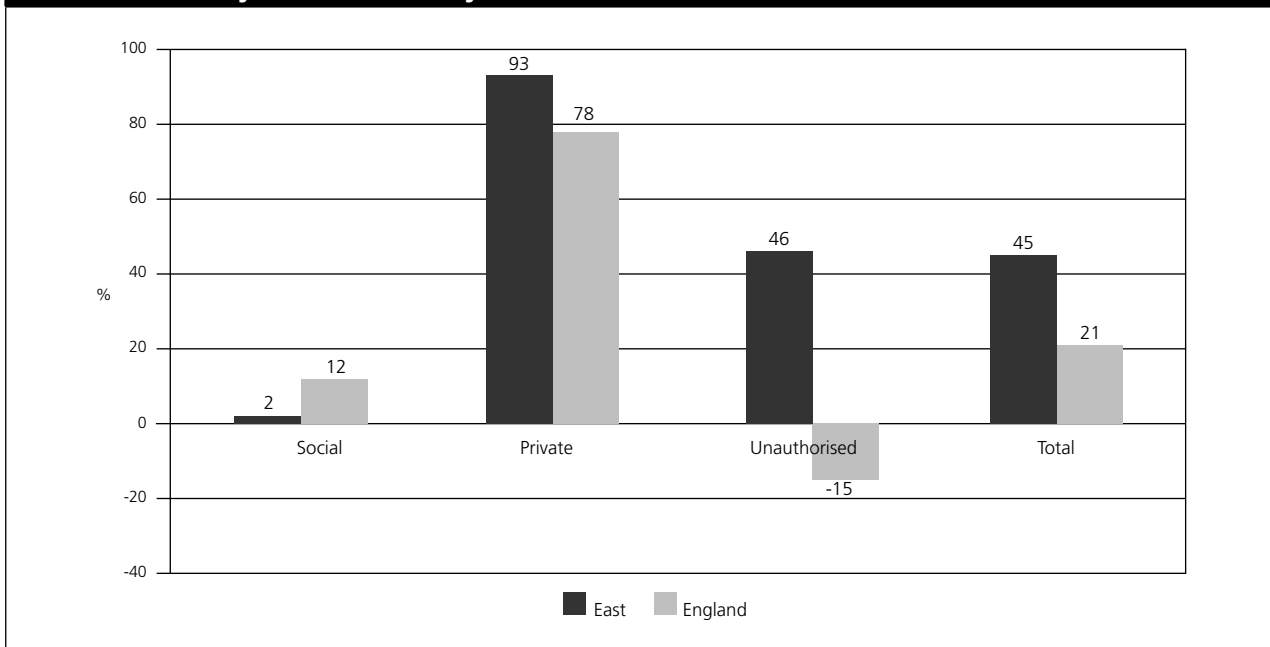
¹¹ Available at: <http://www.eera.gov.uk/Documents/Meetings%20and%20Events/Assembly%20and%20Panels/Gypsies%20and%20Travellers/Sustainability%20Appraisal/Scoping%20Report%20191006.pdf>

These figures show that the East of England has relatively fewer caravans on social rented sites and on unauthorised encampments (that is, on unauthorised sites, not on Gypsy-owned land) than average but that the proportion of caravans on private sites and especially on unauthorised developments (that is, on unauthorised sites on Gypsy-owned land) are above the national average.

Examining the regional distribution of caravans on different types of sites reveals that the East of England has the highest number of caravans on all types of site except unauthorised encampments. Caravan numbers are particularly high on unauthorised developments where East of England has almost twice as many caravans as the next nearest region (South East). Requirements from unauthorised development are, therefore, likely to be particularly significant in the East of England. More generally, the numbers of caravans counted indicate a significant Gypsy and Traveller population living on sites which will generate requirements through family growth and household formation.

The numbers of caravans in the East of England has increased significantly more rapidly than the national average since January 1994 (see Figure A2.2). These figures do, however, mask variations between different types of sites. For example, numbers of caravans on social rented sites have grown less rapidly in the East of England than nationally while the converse is true for private sites and unauthorised sites. The increase in numbers of caravans on unauthorised sites is entirely due to the growth in unauthorised developments in the Region. Between January 1998 (the first date figures are available) and January 2006, the number of caravans on unauthorised developments in East of England more than tripled from 267 to 851. Over the same period the number of caravans on unauthorised encampments decreased to a third of 1998 levels, from 455 to 148.

Figure A2.2 : Percentage Change in Caravan Numbers in the East of England and England between January 1994 to January 2006



The figures presented in this section demonstrate a context for regional pitch requirement assessment of relatively high caravan numbers and relatively rapid growth, particularly in the private provision (or would-be private provision) sector.

As the previous chapters have explained, the tool comprises six Steps. These are:

Step 1: Assembling GTAA information and stock-taking.

Step 2: Benchmarking GTAA information, using a checklist of twelve questions.

Step 3: Filling gaps and assessing regional pitch requirements, using a pragmatic formula to express the relationship between requirement and existing authorised site provision and extent of unauthorised development of sites without planning permission.

Step 4: Stock-taking information at LPA level to see which GTAAs have split requirements between LPAs, and on what basis such a split has been made.

Step 5: Filling gaps at LPA level, again using the formula to provide a split of regional pitch requirements mainly on the basis of ‘need where it arises’.

Step 6: Considering principles which influence a ‘strategic view of needs’, using a checklist of questions to be applied by RPBs.

The sections below move through each of these Steps to illustrate how the tool is applied, using the East of England as a case example. A brief reminder of the purpose of each Step of the tool is also provided.

Step 1: Assembling GTAA information and stock-taking

Step 1 simply assembles the basic information in order to take stock of what is available. This involves producing a listing of all LPAs in the Region to show which (if any) GTAA they are covered by; the GTAA period; and the residential pitch requirement from the GTAA in as much detail as possible. To facilitate later calculations, it is appropriate also to include figures from the most recent January Caravan Count (January because it better represents base numbers) for caravans on authorised sites (both social and private) and for caravans on unauthorised developments (on unauthorised sites on Gypsy-owned land).

The output from Step 1 for the East of England is shown in Annex 3, Table A3.1. Broadly this illustrates that:

- There are 48 LPAs in the Region.
- At the time of writing, six GTAAs had been completed which made some form of quantitative assessment of residential pitch requirements (a report in Norfolk at county-level provided qualitative and descriptive information only).
- These GTAAs are at different scales. Thus Essex and Bedfordshire & Luton include a geographical county with associated unitary authorities. The Cambridgeshire Sub-Region GTAA includes the county and Peterborough, but also two authorities in Suffolk and one in Norfolk. The county of Hertfordshire is entirely covered by two GTAAs. South Norfolk is, at present, the only district to have produced a quantitative pitch requirement assessment on the basis of the Norfolk GTAA; this is currently the only example of a single-authority GTAA estimate in the Region.

- There are currently gaps in coverage. Five districts in Norfolk and five in Suffolk have no coverage at all at present. Assessments are in progress in these areas and will be complete by Spring 2007.

In summary, of the 48 LPAs, ten have no current GTAA coverage. The remaining 38 LPAs are covered by an existing GTAA (fourteen with and 24 without an assessment of pitch requirements at LPA level).

This is the basic information which must now be assessed and supplemented in the further Steps of the tool.

Step 2: Benchmarking GTAA information

The purpose of **Step 2** is to systematically examine local GTAAs with a view to checking their robustness and consistency. Where they are judged robust in this benchmarking process, their estimates of requirements will be accepted without amendment. Where they are judged to be likely to significantly over- or under-estimate requirements, alternative methods of calculating requirements for the areas covered are used in reaching a regional estimate.

Table A3.2 in Annex 3 shows the detailed output from benchmarking the six completed GTAAs which include quantitative estimates of residential pitch requirements. Inevitably benchmarking is reliant on information provided in the report available. In one instance too little information was provided on the methods by which requirements were calculated to allow us to reach a judgement. In general, we have made judgements based on our experience and knowledge of Gypsy and Traveller accommodation issues and needs assessment, and on what appears to be common practice across GTAAs gleaned from the wider benchmarking carried out in part of Stage 1 of this research.

The broad conclusions from benchmarking the six East of England GTAAs are:

- **Bedfordshire & Luton:** Needs are comprehensively assessed. Assumptions about likely vacancies on sites seem high over the 5 year period compared with the rate at which pitches are reported to have become available for re-letting in the past, suggesting that requirements may be under-estimated. ***Recommend re-calculating in Step 3***
- **Cambridgeshire Sub-Region:** Broadly robust. Omission of site waiting list information may have produced a small under-estimation, but omission of pitch turnover as a source of supply may have produced a small over-estimation. So all things being equal it may be about right. ***Recommend using the total requirements from the GTAA***
- **Essex:** There is effectively no allowance for any current pitch shortfall except that represented by unauthorised development. Assumed household growth is likely to be an under-estimate. These are likely to outweigh any over-estimate due to ignoring pitch turnover contributing to supply. Can assume that there is a significant under-estimate of requirements. ***Recommend re-calculating in Step 3***

- **North & East Hertfordshire:** Small omission because need from unauthorised development is not taken into account. No double counting possible. Broadly robust with the addition of an allowance for unauthorised development. ***Recommend adding pitches for current unauthorised development at Step 3***
- **South & West Hertfordshire:** Overall a comprehensive assessment. Produces a requirement rather higher than other GTAA's in relation to current provision, apparently because of long site waiting lists which make up a significant proportion of need. If site waiting lists are inflated could over-state requirements. ***Recommend re-calculating in Step 3 because apparently out of step with other assessments***
- **South Norfolk:** In the absence of information about how the requirement (18 to 24 residential pitches on three sites) has been estimated it is impossible to comment on its robustness. Produced in-house by people with direct information and understanding of the local population and their circumstances. ***Recommend that the GTAA requirement is adopted for LPA pitch allocation at Step 5***

These recommendations are taken forward into the next Step of the tool.

Step 3: Filling Gaps and Assessing Regional Pitch Requirements

The purpose of Step 3 is to reach a regional assessment of pitch requirements. The building blocks here are GTAA study areas or, where there is no GTAA at present, county areas including any associated unitary authorities. When calculating regional requirements, the total assumed for any GTAA/county area might be:

- The assessed GTAA total residential pitch requirement (where the GTAA has been assessed generally robust at Step 2)
- The assessed GTAA total with some adjustment as indicated by benchmarking at Step 2
- A newly calculated estimate where either there is no GTAA at present or benchmarking has suggested that the GTAA assessment is likely to be a significant over- or under-estimate of requirement

If a newly calculated estimate is required to fill gaps the formula is as follows:

**Pitch requirement for an area equals the number of
unauthorised development pitches in the area
plus 40 per cent of the number of authorised pitches in the area**

Or

$$R = UDP + 0.4AP$$

Table A3.3 in Annex 3 applies Step 3 of the tool and sets out the calculations for estimating pitch requirement for the East of England. The outcome is summarised in Table A2.1 overleaf (figures have been rounded to the nearest 5).

Table A2.1 : Pitch Requirement and Source of Estimate for each GTAA or County Area in the East of England

GTAA/County	Requirement	Source
Bedfordshire & Luton	85	Formula because of supply over-estimate
Cambridgeshire & Peterborough	385	GTAA
Essex & unitaries	440	Formula because of significant under-estimate
North & East Hertfordshire	45	GTAA + unauthorised development pitches estimated from Count
South & West Hertfordshire	70	Formula because of possible over-estimate in GTAA
Norfolk	95	GTAA for LPAs currently covered + formula for other LPAs
Suffolk	100	GTAA for LPAs currently covered + formula for other LPAs
East of England Region	1,220	Sum of individual calculations

The individual GTAAs have slightly different plan periods (see Table A3.1 from Step 1 of the tool). We have not made any adjustment to bring them to a common basis for two reasons:

- The Cambridgeshire Sub-Region GTAA covers the period 2005-2010 rather than the more common 2006-2011. It scarcely seems worthwhile updating for a single year.
- The South & West Hertfordshire GTAA covers the period 2004-2009. This area's requirement is calculated by formula.

Thus the estimated regional requirement is around **1,220 net additional residential pitches**. This comprises a combination of estimates taken directly from GTAAs, a GTAA slightly modified, and estimates by formula where there is no GTAA or the GTAA estimate is thought likely to be seriously inaccurate. In Norfolk and Suffolk, where some LPAs are covered by a robust GTAA, the GTAA requirement has been taken for these LPAs while the formula has been applied to remaining LPAs not yet covered by a GTAA.

The current base of authorised pitch provision, from GTAAs and Counts, is in the range of 1,800 to 1,900 pitches. Net additional residential pitch requirements therefore equate to about 65 per cent of the current base.

This assessment of pitch requirements relates to an initial 5 year plan period. Requirements thus include an allowance for current backlog shortage of pitches as well as continuing family growth over the initial 5 years. The present shortage means that it is currently impossible to predict trends into a period when sites are provided and shortage is reduced. There is no means of knowing now whether Gypsies and Travellers will, for example, seek to form smaller independent households or if numbers of Gypsies and Travellers will leave bricks and mortar housing if site accommodation is available. There is effectively no basis on which long-term predictions and assessments could be made.

At present, the best assumption to be made for a period when the current backlog of site need has been cleared is **household growth rate of 3 per cent a year compound**. The important point is to counter any perception that Gypsy and Traveller need can be met on a once-and-for-all basis. Rates of family formation should ideally be monitored in future and assumptions refined.

Given the difficulties in making longer-term predictions of requirements we think it inappropriate to attempt to assess requirements now for the period between 2011 and 2021 in the East of England. Significant provision in the first five years of the plan period should allow the continuing rate of household growth to be monitored, and the level of need to be better assessed in the future.

Step 4: Stock-taking information at LPA level

Step 4 simply assembles information at LPA level from GTAAs. It also notes the basis on which GTAAs split requirements between LPAs, where such a split is made.

Basic information for this Step was assembled at Step 1 and is presented in Table A3.1. As can be seen, there are many gaps in at LPA level as only the Bedfordshire & Luton and Cambridgeshire Sub-Region GTAAs split requirements between LPAs; in addition there is a single-authority assessment in South Norfolk. Overall, then, the GTAAs provide pitch requirement figures at LPA level for only 14 of the 48 LPAs in the region. Step 5 will consider how the gaps can be filled.

GTAAs do not follow exactly the same approach in splitting pitch requirements:

- The Bedfordshire & Luton assessment is mainly on the basis of ‘need where it arises’. LPA requirement ranges are calculated on the basis of distribution according to the current distribution of provision, Gypsy and Traveller preferences, and applying the needs model at LPA level. There is very little difference between the results from the different methods.
- The Cambridgeshire Sub-Region GTAA split includes some provision for new pitches in Cambridge and St Edmundsbury reflecting council provision and historic provision respectively. The remaining allocations are on the basis of ‘need where it arises’.

Step 5: Filling gaps at LPA level

The purpose of this Step is to provide information on the basis of which RPBs can consider pitch allocation options. This should comprise:

- Information from GTAAs where available, adjusted where appropriate to the revised GTAA requirement total reached in Step 3, indicating those distributions which are not based solely on the pattern of need where it arises.
- Where there is no breakdown of pitch requirements in the GTAA, a figure calculated by the RPB based solely on the pattern of need where it arises.

Tables A3.4 to A3.10 in Annex 3 show the results of applying the Step 5 calculations across the East of England. Each GTAA area/county area is shown separately because the way in which the figures have been arrived at are slightly different.

The tables include several types of information which might be of use:

- Column 4 shows the pitch requirement for each LPA calculated using the Step 3 formula. This can be taken as the purest form of ‘need where it arises’.
- Column 5 re-iterates information from Table A3.1 about any LPA requirement information available from the GTAAs. As noted above, there are more gaps than entries in this column.
- Column 6 is headed ‘advocated residential pitch need’. These are the figures that we suggest EERA should take as the base for considering strategic allocations of pitches between LPAs in Step 6. The method of calculation and reasons for adopting it is described in the final column of each table and is slightly different in each case.
- Column 6 also distinguishes (by pale grey shading) between figures which broadly reflect ‘need where it arises’ from those which include some greater indication of need where it might be met (see Step 4 above). EERA may wish to give different weight to these figures when considering strategic regional pitch allocations because they already include an element of wider thinking.

The advocated pitch need for each LPA in the Region is also summarised in Table A2.2 overleaf.

Table A2.2 : Summary of Pitch Need to 2011 by Local Planning Authority	
Local Planning Authority	Residential pitch need to 2011
Bedford	12
Mid Bedfordshire	22
South Bedfordshire	39
Luton	13
Cambridge	15
East Cambridgeshire	35
Fenland	180
Huntingdonshire	20
South Cambridgeshire	120
Peterborough	13
Broxbourne	13
Dacorum	13
East Hertfordshire	5
Hertsmere	17
North Hertfordshire	3
St Albans	34
Stevenage	7
Three Rivers	2
Watford	4

Welwyn Hatfield	17
Basildon	157
Braintree	15
Brentwood	15
Castle Point	2
Chelmsford	87
Colchester	6
Epping Forest	52
Harlow	12
Maldon	13
Rochford	9
Tendring	2
Uttlesford	12
Southend	0
Thurrock	56
Breckland	13
Broadland	1
Great Yarmouth	1
King's Lynn & West Norfolk	53
North Norfolk	0
Norwich	5
South Norfolk	21
Babergh	0
Forest Heath	18
Ipswich	20
Mid Suffolk	39
St Edmundsbury	15
Suffolk Coastal	0
Waveney	8

Step 6 : Considering a 'strategic view of needs across the region'

Step 6 is where RPBs generate pitch allocation options for consultation and sustainability appraisal before the preferred option is incorporated into the draft RSS. At this stage of the process there is no 'technical' answer based only on the needs or preferences of Gypsies and Travellers. These must be considered in a wider context so as to achieve a sustainable outcome which balances the needs of all communities within general planning principles.

This Step is clearly a matter for RPBs – for EERA in the East of England acting with advice from consultees – and is the heart of their strategic role in the planning process for Gypsy and Traveller site provision. In this section we work through the framework of questions set out in Step 6 to assist in the process of developing pitch allocation options. Comments

are made on the basis of our research and wider experience. There are a number of questions where we have no evidence or suggestions to make. Points made are always things to consider rather than 'answers'. The full output from Step 6 is presented in Table A3.11 in Annex 3. The main conclusions from the analysis are:

- The scale of the issue is represented by a total regional pitch requirement of 1,220 residential pitches in the years to 2011. This might require around 24-25 hectares of land across the Region, and represent between 80 and 125 separate sites. Pitch provision on this scale would be equivalent to around 1 per cent of annual net additional dwellings in the draft East of England Plan.
- The overall regional pattern of authorised sites and unauthorised developments in January 2006 showed a wide scatter, but with some apparent groupings in the ring around London, to the north of Cambridge, and around the Fens. Housing strategy sub-regions do not seem very helpful here. There are some examples of clusters where LPAs with a number of sites adjoin LPAs with none or few, but there are also parts of the Region where LPAs with no/little provision adjoin each other.
- Because most need arises from existing site provision and unauthorised developments, and because these are not evenly spread at present, requirements are also patchy on a 'need where it arises' basis. There are equity arguments for a wider spread. However, we have effectively found no evidence on the proportion of need arising in one LPA which could be transferred elsewhere through pitch allocations. Nor is there evidence of the distance over which requirements might be transferred while creating sustainable sites and communities. There may be areas where LPAs with high needs and local factors which present a challenge to meeting those needs adjoin LPAs with lower needs and/or fewer constraints on provision. Re-allocation of pitches should be at a scale to create new sustainable communities in areas where other criteria for sustainability (especially employment opportunities and road access) are met. Such new communities should be carefully planned and well-supported. Views should be sought through consultation on different pitch allocation options; views of Gypsies and Travellers should be particularly encouraged on this issue.
- There is little evidence to suggest that Gypsies and Travellers have locational preferences which are very different from those of other members of the community. Gypsy and Traveller groups and families differ in their priorities and preferences. Employment opportunities, often involving access to a market for services, are important, as is access to the road network. Rural and urban authorities can both accommodate sustainable sites. Opportunities for site development in major residential growth areas should be explored. Gypsies and Travellers often express a preference for edge of settlement locations, but rarely for remote ones. At a regional scale, these considerations rule out only the most remote and isolated areas.
- Given the scale of provision required, it is improbable that existing built-up areas, environmental protection designations or flood risk would rule any LPA out entirely from a pitch allocation. The Green Belt, affecting as it does some of the major current concentrations of sites, has the greatest potential effect.

- Most Gypsies and Travellers aspire to site ownership. However, not all want to own a site or could afford to do so. The proportion who could afford a site is currently unknown because of lack of information on income and savings, and the effect that the new planning system will have on land prices and thus site development costs. Between a third and half of pitch requirements might be developed on social sites. Private site provision should be seen as 'affordable' rather than 'market' housing and initiatives considered for the delivery of 'affordable' pitches.

Transit needs in the east of England

The tool deals with residential pitch requirements. Most GTAAAs have dealt primarily with residential need, and a great deal is still not known or understood about Gypsy and Traveller travelling patterns and other factors which lead to unauthorised encampments. However, transit need must not be ignored in RSS reviews.

There are two forms of basic information on need for transit accommodation: GTAAAs and the Caravan Counts. **GTAA information** is patchy, and a specific estimate is made in only four of the six GTAAAs reviewed (for the detail see Table A3.12 in Annex 3). This produces a total of 52 pitches plus 'accommodation for 45 households a year' across Bedfordshire & Luton, Hertfordshire (all) and South Norfolk. The Cambridgeshire Sub-Region GTAA is much less definite, but following its tentative suggestion could lead to an estimate of almost 130 pitches. This would be accompanied by a compensating reduction in residential pitch requirements which we do not believe, from our benchmarking, would be justified. There is no assessment for Essex. Information on Transit Needs arising from the East of England GTAAAs is presented below:

With regard to the **Caravan Count**, this is especially suspect in making comments on the need for transit accommodation:

- Unauthorised encampments are especially likely to be missed from the return unless the local authority is very active and has good identification and recording systems.
- Unauthorised encampments arise from a dynamic process, and snapshot Counts – even if totally accurate – can be misleading because of events on the day of the Count.

However, in the absence of other better information, Count information can be used to give useful indications of the scale of the issue and locations particularly subject to unauthorised encampment.

Count information shows that unauthorised encampment in the East of England is somewhat below national levels in terms of the proportion of caravans involved (see East of England context above). Only 4 per cent of caravans (just under 150) in January 2006 were on unauthorised sites not owned by Gypsies. The figure is higher in summer, and was about 300 in July 2006.

Very crudely, an objective to accommodate all summer caravans (about 300) might suggest a need for between 20 and 30 sites with average capacity of 10 or 15 caravans. A vacancy rate would have to be added. Taken at face value, the figures suggest that much of this capacity would be vacant in winter.

Looking at the five most recent Counts, individual LPAs differed in the number of periods in which there were any caravans on unauthorised sites on land not owned by Gypsies. About 45 per cent of regional LPAs experience more than sporadic and occasional encampment.

Five LPAs recorded at least 50 caravans over the last five Counts and recorded caravans at four or five dates. These LPAs are:

East Cambridgeshire
Fenland
Broadland
King's Lynn and West Norfolk (but includes some imputed values)
South Norfolk

All are in either Cambridgeshire or Norfolk, and all except Broadland have relatively high levels of site provision. South Norfolk is unusual in that the majority of its caravans are classed as 'tolerated' which might suggest that unauthorised encampment here informally boosts site provision.

A further group of LPAs recorded at least 30 caravans over the five Counts, and recorded caravans in at least three periods:

Mid Bedfordshire
Huntingdonshire
South Cambridgeshire
Braintree (boosted by a large number in one period)
Tendring (boosted by a large number in one period)
Breckland
Great Yarmouth (summer periods)
North Norfolk
Waveney (summer periods)

A great deal more research is needed to fully understand these patterns. However, it is possible to put forward some tentative comments:

- Most LPAs with relatively high and consistent levels of unauthorised encampment also have relatively high 'settled' Gypsy and Traveller populations. It seems reasonable to conclude that encampments arise when Gypsies and Travellers visit friends and relations in the area. An alternative explanation is that the same factors which attracted Gypsies and Travellers in the first place still attract Gypsies and Travellers who stop on unauthorised encampments. Existing settlement areas are likely to lead to temporary/transit needs. More flexible sites and greater accommodation for visitors on sites/pitches might reduce the level of unauthorised encampment.
- There may be evidence of 'summer holiday' type encampments in the figures from Great Yarmouth, Waveney and Broadland.
- The more sporadic encampments may indicate the transit need from Gypsies and Travellers travelling through an area, or staying in an area while working there for a period.

Annex 3: Detailed Tables Relating to the Application of the Tool in the East of England

Table A3.1: Output From Step 1 of the Tool in East of England

Table A3.2: Output of the Benchmarking Exercise for East of England GTAAs

Table A3.3: Calculation of Regional Pitch Requirements (Step 3)

Table A3.4: Bedfordshire & Luton Pitch Allocation

Table A3.5: Cambridgeshire & Peterborough Pitch Allocation

Table A3.6: Essex & Unitary Authorities Pitch Allocation

Table A3.7: North & East Hertfordshire Pitch Allocation

Table A3.8: South & West Hertfordshire Pitch Allocation

Table A3.9: Norfolk Pitch Allocation

Table A3.10: Suffolk Pitch Allocation

Table A3.11: Detailed Output from Step 6

Table A3.12: Information on Transit Need from GTAAs

Table A3.1: Output from Step 1 of the Tool in East of England

REGIONAL ASSESSMENT OF PITCH REQUIREMENTS

BASIC INFORMATION

LPA and County	GTAA	GTAA Period	From GTAA Residential pitch need assessed	From January 2006 Count Caravans on authorised sites	Caravans on unauthorised developments
Bedford	Bedfordshire & Luton	2006-2011	10	22	0
Mid Bedfordshire	Bedfordshire & Luton	2006-2011	19	64	17
South Bedfordshire	Bedfordshire & Luton	2006-2011	34	100	45
Luton	Bedfordshire & Luton	2006-2011	11	26	0
<i>Bedfordshire & Luton</i>	<i>Bedfordshire & Luton</i>	<i>2006-2011</i>	<i>74</i>	<i>212</i>	<i>62</i>
Cambridge	Cambridgeshire S-R	2005-2010	15	23*	0
East Cambridgeshire	Cambridgeshire S-R	2005-2010	35	126	4
Fenland	Cambridgeshire S-R	2005-2010	180	433*	76*
Huntingdonshire	Cambridgeshire S-R	2005-2010	20	38	8
South Cambridgeshire	Cambridgeshire S-R	2005-2010	120	412	173
Peterborough	Cambridgeshire S-R	2005-2010	18	139	0
<i>Cambridgeshire + Peterborough</i>	<i>Cambridgeshire S-R</i>	<i>2005-2010</i>	<i>388</i>	<i>1171</i>	<i>251</i>

* = Figure from July 2006 Count because of significant increase over January.

Table A3.1: Output from Step 1 of the Tool in East of England (continued)

LPA and County	GTAA	GTAA Period	From GTAA		From January 2006	
			Residential pitch need assessed	Residential pitch need assessed	Caravans on authorised sites	Caravans on unauthorised developments
Basildon	Essex	2006-2011			203	185
Braintree	Essex	2006-2011			43	9
Brentwood	Essex	2006-2011			18	19
Castle Point	Essex	2006-2011			0	3
Chelmsford	Essex	2006-2011			126	97
Colchester	Essex	2006-2011			12	6
Epping Forest	Essex	2006-2011			117	42
Harlow	Essex	2006-2011			50	0
Maldon	Essex	2006-2011			55*	0
Rochford	Essex	2006-2011			2	14
Tendring	Essex	2006-2011			0	3
Uttlesford	Essex	2006-2011			52	0
Southend	Essex	2006-2011			0	0
Thurrock	Essex	2006-2011			111	50
<i>Essex + unitaries</i>	<i>Essex</i>	<i>2006-2011</i>	<i>288#</i>		<i>789</i>	<i>428</i>
Broxbourne	North & East Herts	2006-2011			31	9
East Hertfordshire	North & East Herts	2006-2011			7	6
North Hertfordshire	North & East Herts	2006-2011			14	0
Stevenage	North & East Herts	2006-2011			28	0
Welwyn Hatfield	North & East Herts	2006-2011			75	0
<i>North & East Hertfordshire</i>	<i>North & East Herts</i>	<i>2006-2011</i>	<i>35</i>		<i>155</i>	<i>15</i>

* = Figure from July 2006 Count because of significant increase over January.

= Estimate made by converting caravans on unauthorised developments to pitches by dividing by 1.7; estimated pitch growth added

Table A3.1: Output from Step 1 of the Tool in East of England (continued)

LPA AND COUNTY	GTAA	GTAA Period	From GTAA		From January 2006	
			Residential pitch need assessed	Caravans on authorised sites	Caravans on authorised sites	Caravans on unauthorised developments
Dacorum	South & West Herts	2004-2009		55	0	0
Hertsmere	South & West Herts	2004-2009		67	3	3
St Albans	South & West Herts	2004-2009		100	17	17
Three Rivers	South & West Herts	2004-2009		7	0	0
Watford	South & West Herts	2004-2009		15	0	0
South & West Hertfordshire	South & West Herts	2004-2009	125	244	20	20
Breckland				44	5	5
Broadland				3	0	0
Great Yarmouth				4	0	0
King's Lynn & West Norfolk	Cambridgehire S-R	2005-2010	53	159	28	28
North Norfolk				1	0	0
Norwich				27	0	0
South Norfolk	South Norfolk	2006-2011	21	42	12	12
Norfolk				280	45	45
Babergh				0	0	0
Forest Heath	Cambridgehire S-R	2005-2010	18	75	0	0
Ipswich				87	0	0
Mid Suffolk				72	38	38
St Edmundsbury	Cambridgehire S-R	2005-2010	15	4	4	4
Suffolk Coastal				0	0	0
Waveney				33	0	0
Suffolk				271	42	42

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's	
GTAA: Bedfordshire & Luton Gypsy & Traveller Study	
Q1: Are all appropriate groups considered in the assessment?	
	Includes sited and housed Gypsies and Travellers. No New Travellers included in the survey, perhaps because there were none in the area. One housed Showman included in the survey, but no separate comments/conclusions on the needs of Travelling Showmen. <i>No obvious omissions; does not consider needs of Showmen</i>
Q2: Is the survey method used generally reliable?	
	Sample frame was list of sites from Count. Census approach with up to three call-backs on sites. Quota set for interviews with housed Gypsies and Travellers. Aimed to carry out 200 interviews and achieved 207 including 42 in houses/mobile homes. Response rates 70 per cent-plus on authorised and unauthorised sites. Extremely comprehensive and detailed questionnaire. Includes income questions (38 per cent response rate on sites). Apparently detailed and precise answers given, uncommon in GTAA's No obvious problems with the survey methods used
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	
	16 households overcrowded: calculated from survey data for people in the household and the number of beds required. This showed 28 overcrowded. 12 of these are not counted here because they are included as concealed households. 16 households concealed: calculated from survey data on question asking whether anyone in the household was likely to need independent accommodation in the next three years. '80 individuals were identified over 5 years' (not clear how from the question). $80/5 = 16$. 16 counted as current backlog and remaining 64 as new family formation (see below). <i>Reasonable allowance made on basis of survey</i>
Q4: What allowance is made for needs arising from current unauthorised developments?	
	55 households : calculated from 55 households on unauthorised developments in July 2005. The survey found no household on an unauthorised development planning to move out of the Study Area. <i>Survey based assumptions making allowance for all developments</i>
Q5: What allowance is made for needs arising from unauthorised encampment?	
	20 households: calculated from 22 households on unauthorised encampments in July 2005 only 2 of whom had a permanent base elsewhere. The survey found no household on an unauthorised encampment planning to move out of the Study Area. All those planning to move from an unauthorised encampment were looking for permanent accommodation. <i>Survey based assumptions on the current situation. No allowance for need from any future unauthorised encampments over the 5 year period</i>
Q6: What allowance is made for future population growth and household formation?	
	New family formation of 64 assumed on the basis of 16 a year for 4 years from those households with members likely to want independent accommodation. Equates to a household formation rate of 6.9 per cent a year (16 on 232) on all sites (authorised and unauthorised) or 4.4 per cent a year (7 on 159) on authorised sites. <i>Survey based assumption which is relatively high compared with some other GTAA's</i>

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)	
Q7: What allowance is made for net movement between sites and housing?	None in the quantified model of need although there are comments suggesting that a need has been identified in the survey from those currently living in housing, some of whom would prefer a pitch. <i>May understate pressure on pitches</i>
Q8: What allowance is made for net movement between the study area and elsewhere?	None as a separate item in the model. Comments that there is net in-migration of Gypsy and Traveller households to the Study Area, apparently in spite of a number of survey respondents saying that household members had been forced to leave the Area because no site was available. <i>In-migration probably implicit in assumptions about unauthorised development and encampment</i>
Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?	Survey questions about 'ideal sites' in terms of size and tenure (50 per cent between 11 and 20 pitches; 69 per cent family owned site with planning permission; 95 per cent in Study Area; 75 per cent in a rural area). Not incorporated in the quantitative model. No split between social and private provision.
Q10: Are any other factors taken into account on the need/demand side of the model?	No
Q11: What assumptions are made about supply of pitches over the assessment period?	Assumes that 95 pitches will become available over 5 years (on a base of 159 current permanent supply). Calculated from survey findings for people expecting to move from an authorised site to: an unauthorised encampment, another authorised site, housing and outside the District. This total (19 households) is assumed to be an annual movement and multiplied by 5 for 5 years. New LA sites and private site developments receiving planning permission assumed to be nil. <i>This seems unrealistically high especially in the light of information provided about past turnover rates on LA sites</i>
Q12: Overall, are there any obvious inadequacies, omissions or double-counting?	Needs are comprehensively assessed. Assumptions about likely vacancies on sites seem high over the 5 year period, suggesting that requirements may be under-estimated

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's (continued)	
GTAA: Cambridgeshire Sub-Region Traveller Needs Assessment	
Q1: Are all appropriate groups considered in the assessment?	<p>Attempts to involve all groups, however 95 per cent of the sample is made up by English Gypsies and Irish Travellers. Showmen and New Travellers are included but in very small numbers. Housed Gypsies and Travellers included.</p> <p><i>No obvious omissions</i></p>
Q2: Is the survey method used generally reliable?	<p>The sample frame is from visits to all known sites. Adopted a snowball sampling method. Predominantly sampled authorised provision. Very few interviews on unauthorised encampments or in housing. Achieved 313 interviews which roughly equates to about 20 per cent of the estimated households present in the study areas. Questionnaire not included in report.</p> <p><i>Sampling generally robust; no comments on questionnaire</i></p>
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	<p>Used a standard 10 per cent multiplier of overcrowding for all sites (this includes a concealed household allowance and presumably doubling-up too) – this equates to around 72-92 pitches.</p> <p><i>Would be clearer if these things were separated but no reason to doubt overall figure</i></p>
Q4: What allowance is made for needs arising from current unauthorised developments?	<p>Allowance is made for all unauthorised caravans (developments and encampments). Used average of the last 3 years count figures (Jan and July) and adjusted based on survey responses for people on unauthorised encampments who are not seeking local provision (equates to 221-261 pitches needed).</p> <p><i>Accounts for all unauthorised developments</i></p>
Q5: What allowance is made for needs arising from unauthorised encampment?	<p>See Q4 above. This implicitly assumes that those on unauthorised encampments need pitches; the extent/nature of the adjustment to account for those not seeking local provision is not spelled out. Does not indicate a distinction between transit or residential provision.</p> <p><i>May over-state requirements for residential pitches slightly, but overall level of unauthorised encampment is fairly low</i></p>
Q6: What allowance is made for future population growth and household formation?	<p>Uses a 3 per cent pa multiplier for household growth. 84-134 pitches are required 2005-2010.</p> <p><i>In line with some other GTAA's and no reason to doubt general accuracy</i></p>
Q7: What allowance is made for net movement between sites and housing?	<p>Applies a 5 per cent allowance for those who want site accommodation but are currently accommodated in housing. Suggests a constant review of this as these assumptions are grounded on insufficient data. This equates to 25-31 extra pitches. Comments that 12 per cent of interviewees would live in a house but not taken further into account.</p> <p><i>Cautious assumption – unable to determine whether it might over- or under-estimate requirements on current information</i></p>

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's (continued)

Q8: What allowance is made for net movement between the study area and elsewhere?

None – no allowance either way. Gypsies and Travellers are assumed to be local and there to be little or no inward movement.

This may be either an under-estimate or an over-estimate – hard to say

Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?

None – except to state in the findings that 49 per cent of the sample wanted their own land.

May impact on future household growth and need

Q10: Are any other factors taken into account on the need/demand side of the model?

No – omits any waiting list information.

Q11: What assumptions are made about supply of pitches over the assessment period?

Does not provide details on occupancy levels or pitch turnover on sites or any anticipated plans for extension, closure or opening. Also does not look at private sites in any depth. Therefore, assumes full occupancy and status quo at the time of the assessment.

May have slightly over-estimated the need for new pitches if existing pitches become vacant via turnover rates

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?

Excludes:

- information from site waiting lists
- net migration
- turnover rates on sites

Overall conclusion – broadly robust but omission of waiting list information may have produced a small under-estimation. On the other hand, omission of turnover may have produced a small over-estimation. So all things being equal it may be about right overall.

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)	
GTAA: Essex (Looking Back, Moving Forward)	
Q1: Are all appropriate groups considered in the assessment?	
	Majority are Irish Travellers (two-thirds); most of rest are Gypsies. 4 Showpeople included. No New Travellers, barges or Circus People – unclear to what extent these groups are present in the county.
Q2: Is the survey method used generally reliable?	
	Sampling was purposive given the limited information and involvement of ‘gatekeepers’. This was a pragmatic approach which reflected the broadly qualitative goals of the study. A total of 72 individuals are represented (64 heads of households). <i>Sample generally reflective of the local population but smaller than in some other GTAs due to the more in-depth, qualitative methods used</i>
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	
	No allowance is made for this. <i>This is likely to under-estimate need</i>
Q4: What allowance is made for needs arising from current unauthorised developments?	
	These are included as reflected in the Caravan Count and incorporated into the projections. Almost 40 per cent of the population were resident on unauthorised developments. <i>Sound assessment in relation to unauthorised development</i>
Q5: What allowance is made for needs arising from unauthorised encampment?	
	Has been included in household growth calculations derived from Caravan Count but these are not particularly reliable. <i>Likely that there is a degree of under-estimation as a result</i>
Q6: What allowance is made for future population growth and household formation?	
	Applies a future household increase of 4.95 per cent from 2006-2011 and 5.16 per cent 2011 to 2016 consistent with the settled population of Essex (from Interim 2002-based Projection of Households in England (ODPM, 2004)). This equates to 28 households or 112 individuals. Thus, need is for 56 additional caravans 2006-2011 at 2 caravans per pitch, so 28 pitches; a further 31 pitches needed to 2016. Total = 59 to 2016. <i>This assumption is lower than most GTAs and is likely to lead to an under-estimate of need since it is normally assumed that population and household increase is more rapid among Gypsies and Travellers than among the settled population</i>
Q7: What allowance is made for net movement between sites and housing?	
	This is not included in the projections but reports that most would not consider living in a house. Intentions on movement the other way (i.e. from housing to sites) are explored and no great desire to do so is identified; but the sample size is just 2. <i>Difficult to ascertain whether the treatment of these movements constitutes an over- or under-estimate</i>

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)

Q8: What allowance is made for net movement between the study area and elsewhere?

Not included in the quantitative assessment but reports that the vast majority of respondents do not travel and are happy in Essex with no intention of leaving. In terms of in-movement this is obviously extremely difficult to grasp and is not accounted for in projections.

Modest net in-movement likely to constitute an under-estimate

Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?

Findings suggest most people wish to remain in their current accommodation situation within Essex.

Q10: Are any other factors taken into account on the need/demand side of the model?

None.

Q11: What assumptions are made about supply of pitches over the assessment period?

Assumed zero but unauthorised developments could receive official status. This would have no bearing on accommodating need as it does not change the situation (i.e. those on unauthorised developments will stay whether permission granted or not).

Omission of any assumed pitch vacancies through turnover must lead to some under-statement of supply and thus over-statement of need over the full period to 2016

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?

There is effectively no allowance for any current shortfall except represented by unauthorised development, and assumed household growth is likely to be an under-estimate. These are likely to outweigh any over-estimate due to ignoring pitch turnover contributing to supply.

Might assume that there is a significant under-estimate of requirements

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's (continued)	
GTAA: Northern and Eastern Hertfordshire: Gypsy and Traveller Accommodation Assessment	
Q1: Are all appropriate groups considered in the assessment?	Gypsies and Irish Travellers are included. No New Travellers in the area. Travelling Showmen and Circus People are not included. Survey only includes Gypsies and Travellers on sites. Housed Gypsies and Travellers are not included (comments best way to include them is in a mainstream Housing Needs Assessment).
Q2: Is the survey method used generally reliable?	The sample frame is known sites (3 LA sites with 68 pitches; 8 private sites with 29 families; 1 unauthorised site with 2 families). Aimed at complete census during week in September 2005. Achieved 65 interviews, equivalent to two-thirds of 97 authorised pitches on 11 out of 12 sites. One interview from an unauthorised site (unclear whether this was an unauthorised development or encampment). Comprehensive questionnaire aimed mainly at accommodation. Included question on employment status, not answered by 21 per cent. <i>Sampling and questionnaire generally robust</i>
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	None. Survey found that no family members are likely to want their own accommodation in the next 2 years. Survey found that 20 per cent of interviewees needed more caravans to accommodate their family's needs. A family moving to a larger pitch would vacate a pitch so there would be no effect on overall requirements. <i>Unusual among GTAA's to have no evidence of current shortfall, but survey provides evidence</i>
Q4: What allowance is made for needs arising from current unauthorised developments?	None. Analysis of the Count shows there has been unauthorised development (still present in July 2006 Count) but comments there have been very few and therefore there is no need to provide pitches on authorised residential sites for those on unauthorised developments. <i>Likely to under-estimate need to a modest extent (14 caravans July 2006)</i>
Q5: What allowance is made for needs arising from unauthorised encampment?	None. Numbers of unauthorised developments/encampments are reported by District from secondary sources. Comments that these are 'more likely to reflect people passing through the area who would benefit more from a transit site than from extra residential pitches'. para 8.8. The single interviewee on an unauthorised site is not distinguished in analyses. <i>May under-estimate need. Little evidence presented that most people are purely transient</i>
Q6: What allowance is made for future population growth and household formation?	15 pitches required (on base of 97) over next 5 years. Unclear whether this is calculated at 3 per cent a year or based on analysis of age structure. Need for site places likely to double (97 to c200) over 20 to 25 years. Estimates that 15-20 additional pitches will be required each 5 years. <i>Reasonable assumption in line with assumptions made in other GTAA's</i>
Q7: What allowance is made for net movement between sites and housing?	Assumes it will be nil. No site residents interviewed intended to move to a house. No survey respondent had left a house in the past 3 years. No-one on the site waiting list lives in a house. <i>Presents arguments to support nil net movement</i>
Q8: What allowance is made for net movement between the study area and elsewhere?	

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)

Estimates 20 pitch requirement from site waiting list of those applying from outside Hertfordshire. Counts all those seeking a specific site in the Study Area only and a proportion of those not specifying a particular site.

Reasonable assumptions which implies net inward movement

Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?

None in the quantified assessment. Very little information is provided by the survey because questions about preferences were only asked if respondent is likely to move in next 2 years and no-one expected to move. Comments that high land prices and low incomes (assumed because of lack of formal employment and high incidence of housing benefit) are likely to reduce demand/need for private sites in the Study Area.

Q10: Are any other factors taken into account on the need/demand side of the model?

No. Possible closure of an existing site would require one-for-one replacement.

Q11: What assumptions are made about supply of pitches over the assessment period?

Assumes zero over 5 years. All sites are full and no new sites are planned. Only 1 household in the survey might leave and very few households are expected to dissolve entirely.

Nil assumption may hold for a short period, but could not be extended indefinitely

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?

Small omission because need from unauthorised development not taken into account. No double counting possible.

Overall conclusion: broadly robust with the addition of an allowance for unauthorised development.

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's (continued)	
GTAA : An Assessment of the Accommodation Needs of Gypsies and Travellers in South & West Hertfordshire	
Q1: Are all appropriate groups considered in the assessment?	Broad split between 'English Travellers' and Irish Travellers. No New Travellers known to be in the area. Showmen not included. Housed Gypsies and Travellers included although small sample sizes. <i>Excludes Travelling Showmen</i>
Q2: Is the survey method used generally reliable?	Sample frame consists of known sites with broadly 'representative' sites being selected for inclusion in the sample. On selected sites aim to interview as many as possible. Interviewed 68 people which equates to about 30 per cent of the known population. <i>Very comprehensive questionnaire – good method and generally robust</i>
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	Identified that 50 per cent of site residents are overcrowded. This equates to 40 pitches but is not incorporated per se in the needs model. Might be reflected in assumed future household growth and site waiting lists. <i>This might represent an under-estimate to the extent that overcrowding requires additional pitch provision</i>
Q4: What allowance is made for needs arising from current unauthorised developments?	All unauthorised developments are considered as wanting a pitch within the study area – this equates to 35 pitches. <i>Reasonable assumption and in line with other assessments</i>
Q5: What allowance is made for needs arising from unauthorised encampment?	5 pitches for unauthorised campers – all of which, according to the survey, expressed a desire to remain in the area on a residential basis. <i>Reasonable assumption which is grounded in the survey findings</i>
Q6: What allowance is made for future population growth and household formation?	Provides an indication that 55+ pitches will be needed over the 5 year period 2004-2009. Based on an analysis of known age structure of site residents from secondary sources and the survey. <i>Reasonable assumption grounded in the survey findings</i>
Q7: What allowance is made for net movement between sites and housing?	None – apart from a suggestion that 6/7 lettings per year should accommodate those people expressing an inclination towards housing. Housed Gypsies and Travellers expressed little realistic desire to move to sites. <i>Effect unclear as little is known about the needs of housed Travellers</i>
Q8: What allowance is made for net movement between the study area and elsewhere?	No allowance made as such, but some desire for inward movement implicit in use of site waiting lists for public sites. Few interviewees wanted to move away from the areas. Few unauthorised encampments present during the assessment indicated small numbers of encampments in the area generally (which might indicate inward movement). <i>Hard to say whether this is reasonable as this could be either a small over-estimation or a small under estimation</i>

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)**Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?**

States that owner-occupied family site is the main aspiration but few people can afford this and specifies that the 2004-2009 provision be split two-thirds private to one-third public provision in order to be affordable to those who require it.

Q10: Are any other factors taken into account on the need/demand side of the model?

Waiting lists for the public sites in the area contribute the largest element of need (50 out of 90 pitches).

Could inflate need and lead to double-counting with other areas outside South & West Hertfordshire

Q11: What assumptions are made about supply of pitches over the assessment period?

Zero supply assumed from current plans or planning policies. Turn-over rates on the council sites are estimated from management records. Notes that as these stand they would not meet the extent of need and peoples preferences.

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?

Produces a rather higher needs figure in relation to current provision than other GTAs, apparently because of heavy reliance on site waiting list information which is a significant element in assessed need. The robustness of the need assessment is dependent on the accuracy of site waiting lists. No internal double counting between waiting list and household growth, but could be double counting with other areas if applicants are also counted there.

Overall a robust and comprehensive assessment, but could over-state need because of reliance on site waiting lists

Table A3.2: Output of the Benchmarking Exercise for East of England GTAA's (continued)	
GTAA: South Norfolk	
Q1: Are all appropriate groups considered in the assessment?	
<p>Gypsies, New Travellers and Irish Travellers are included. The majority were Gypsies (19 out of a sample of 30), followed by New Travellers (6). Only 1 Irish Traveller was included. The report suggests that Gypsies are the predominant group in the area. As the survey was done by the local Gypsy and Traveller Liaison group and the report suggests that they know the local Gypsy and Traveller community well, can probably have some confidence that no population group with a significant presence has been missed.</p> <p>No Showpeople of Circus People included – but also no reference to whether they have a presence in the area.</p> <p>No housed Gypsies and Travellers included and reference is made to the fact that there are housed Gypsies and Travellers in the district (but no idea of how many).</p> <p><i>Showmen may not be included; housed Gypsies and Travellers not included</i></p>	
Q2: Is the survey method used generally reliable?	
<p>30 interviews in all – not entirely clear whether all are from different households. 8 on the single authorised site in area and 22 on unauthorised encampments.</p> <p>Sample frame was all known Gypsies and Travellers in the district and they aimed for a total population sample. Know of 18 households not included in the sample. Between half and two-thirds included.</p> <p><i>Sampling and questionnaire are generally (methodologically) robust</i></p>	
NOTE FOR ALL FOLLOWING QUESTIONS	
<p><i>This GTAA does not explain how the pitch requirement figure was reached and so it is virtually impossible to identify what elements of need or supply has been included. The following comments are assumptions on the basis of reported information.</i></p>	
Q3: What allowance is made for current overcrowding, or concealed households or doubling up on authorised sites?	
None – these issues do not appear to have been addressed.	
Q4: What allowance is made for needs arising from current unauthorised developments?	
Apparently none although the Count shows caravans on unauthorised sites on Gypsy-owned land.	
Q5: What allowance is made for needs arising from unauthorised encampment?	
Information provided on unauthorised encampments from Counts and survey. Not clear to what extent this element has been taken into account.	
Q6: What allowance is made for future population growth and household formation?	
None. The report notes that there could be a 'steady increase' in numbers of Gypsies and Travellers if newly forming households remain in mobile accommodation in the district. As this is not quantified we assume it has not been incorporated into their assessment of pitch requirements.	
Q7: What allowance is made for net movement between sites and housing?	
Apparently none. The survey asked whether people had ever lived in housing but does not appear to have asked whether people would like to move into housing. It is unlikely that allowances have been made for this.	
Q8: What allowance is made for net movement between the study area and elsewhere?	
Some discussion and analysis of locational preferences and travelling patterns. Not clear whether this has been taken into account in estimates.	
Q9: What allowance is made for Gypsy and Traveller accommodation aspirations?	
No information presented about respondents' preferred accommodation type (permanent, LA, own land, housing etc). Assume no allowance has been made for this.	

Table A3.2: Output of the Benchmarking Exercise for East of England GTAs (continued)

Q10: Are any other factors taken into account on the need/demand side of the model?

No

Q11: What assumptions are made about supply of pitches over the assessment period?

Not clear – there is no discussion on the issue of supply.

Q12: Overall, are there any obvious inadequacies, omissions or double-counting?

In the absence of information about how the requirement (18 to 24 residential pitches on three sites) has been estimated it is impossible to comment on its robustness. Produced in-house by people with direct information and understanding of the local population and their circumstances.

Impossible to make a judgement

Table A3.3: Calculation of Regional Pitch Requirements (Step 3)

GTA and/or County	Caravans from count		Estimated on basis of count		Applying formula	GTA, adjusted GTA or formula
	Authorised sites	Unauthorised developments	Pitches on authorised sites	Pitches on unauthorised developments		
Bedfordshire & Luton	212	62	125	36	86	86
Cambridgeshire + Peterborough	1,171	256	689	151	427	383
Essex + unitaries	789	428	464	252	438	438
North & East Hertfordshire	155	15	91	9	45	44
South & West Hertfordshire	244	20	144	12	70	70
Norfolk	280	45	165	26	92	94
Suffolk	271	42	159	25	89	100
Region	3,122	868	1,837	511	1,247	1,215

Calculated by formula		GTA + unauthorised development pitches		From GTA		From GTA for LPAs covered by GTA + formula for remaining LPAs
-----------------------	--	--	--	----------	--	---

Table A3.4: Bedfordshire & Luton Pitch Allocation: Output from Step 5						
LPA and County	Estimated		Estimated requirement by formula	From GTAA	Estimated	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Bedford	13	0	5	10	12	GTAA total amended by formula. LPA distribution apportioned to amended total in ratio of original GTAA split between LPAs
Mid Bedfordshire	38	10	25	19	22	
South Bedfordshire	59	26	50	34	39	
Luton	15	0	6	11	13	
Bedfordshire & Luton	125	36	86	74	86	

Table A3.5: Cambridgeshire & Peterborough Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated requirement by formula	From GTAA	Estimated residential pitch need	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Cambridge	13	0	5	15	15	Total requirement and split between LPAs taken from GTAA. GTAA split said to be on basis of need where it arises using approach accepted for GTAA total.
East Cambridgeshire	74	2	32	35	35	
Fenland	255	42	144	180	180	
Huntingdonshire	22	5	14	20	20	
South Cambridgeshire	242	101	199	120	120	
Peterborough	82	0	33	13	13	
Cambridgeshire + Peterborough	689	151	427	383	383	

* Taken as the mid point of the range from Figure 14 of the GTAA

Table A3.6: Essex & Unitary Authorities Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated requirement by formula	From GTAA	Estimated	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Basildon	119	109	157		157	Pitch total and LPA split by formula
Braintree	25	5	15		15	
Brentwood	11	11	15		15	
Castle Point	0	2	2		2	
Chelmsford	74	57	87		87	
Colchester	7	4	6		6	
Epping Forest	69	25	52		52	
Harlow	29	0	12		12	
Maldon	32	0	13		13	
Rochford	1	8	9		9	
Tendring	0	2	2		2	
Uttlesford	31	0	12		12	
Southend	0	0	0		0	
Thurrock	65	29	56		56	
Essex + unitaries	464	252	438	307	438	

Table A3.7: North & East Hertfordshire Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated requirement by formula	From GTAA Residential pitch need assessed	Estimated Advocated residential pitch need	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Broxbourne	18	5	13		13	GTAA pitch total amended by addition of unauthorised development pitches. LPA split in ratio of formula applied to this total
East Hertfordshire	4	4	5		5	
North Hertfordshire	8	0	3		3	
Stevenage	16	0	7		7	
Welwyn Hatfield	44	0	18		17	
N&E Hertfordshire	91	9	45	35	44	

Table A3.8: South & West Hertfordshire Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated requirement by formula	From GTAA Residential pitch need assessed	Estimated Advocated residential pitch need	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Dacorum	32	0	13		13	Pitch total and LPA split by formula
Hertsmere	39	2	17		17	
St Albans	59	10	34		34	
Three Rivers	4	0	2		2	
Watford	9	0	4		4	
S&W Hertfordshire	143	12	70	125	70	

Table A3.9: Norfolk Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated REQUIREMENT BY FORMULA	From GTAA Residential pitch need assessed	Estimated residential pitch need	SOURCE AND COMMENTS
	Pitches on authorised sites	Pitches on UNAUTHORISED DEVELOPMENTS				
Breckland	26	3	13		13	County total estimated by formula. LPA split accepted for LPA covered by Cambridgeshire Sub-Region GTAA. South Norfolk single authority GTAA total accepted. Remainder calculated in formula ratios controlled to county total less these LPAs
Broadland	2	0	1		1	
Great Yarmouth	2	0	1		1	
King's Lynn & West Norfolk	94	16	53	53	53	
North Norfolk	1	0	0		0	
Norwich	16	0	6		5	
South Norfolk	25	7	17	21	21	
Norfolk	165	26	92		94	

Table A3.10: Suffolk Pitch Allocation: Output from Step 5

LPA and County	Estimated		Estimated requirement by formula	From GTAA	Estimated	Source and comments
	Pitches on authorised sites	Pitches on unauthorised developments				
Babergh	0	0	0		0	County total estimated by formula. LPA split accepted for LPAs covered by Cambridgeshire Sub-Region GTAA. Remainder calculated in formula ratios controlled to county total less Cambridgeshire Sub-Region LPAs
Forest Heath	44	0	18	18	18	
Ipswich	51	0	20		20	
Mid Suffolk	42	22	39		39	
St Edmundsbury	2	2	3	15	15	
Suffolk Coastal	0	0	0		0	
Waveney	19	0	8		8	
Suffolk	159	25	89		100	

Table A3.11: Detailed Output from Step 6**Q1: What is the scale of the issue to be addressed?***Sub-questions***Q1.1: How much land in total might this involve?**

We suggest that a generous pitch size assumption (200m²) be used to maximise flexibility and sustainability (that is in line with preferences). Such an assumption means that a density of around 50 pitches per hectare might be appropriate. The East of England estimated pitch requirement of 1,220 residential pitches (first 5 years) would thus equate to 24-25 hectares.

Q1.2: How many sites might be involved?

It is clear that many Gypsies and Travellers favour small rather than large sites. This means sites of up to about 15 pitches, although some successful family sites are much smaller and some successful local authority and private sites are larger. Assuming a 10 and 15 pitch average site size would provide a range for the number of sites from the 5 year pitch requirement of between about 80 and 125 sites.

Q1.3: How does this compare with RSS residential allocations?

The East of England Plan Policy H1 says that 23,900 net additional dwellings will be built each year between 2001 and 2021. The annual pitch requirement to 2011 is equivalent to 245 (just over 1 per cent of the annual additional dwellings). Pitch requirements are, therefore, relatively insignificant within the total residential requirements across the Region.

Q2: What is the geographical starting point?*Sub-questions***Q2.1: Does existing provision appear to form natural sub-regional groupings?**

Looking superficially at the map of authorised sites and unauthorised developments (provided by the Community and Local Government Gypsy and Traveller Unit) does not immediately suggest sub-regional groupings across the Region. There are three possible exceptions:

- The concentration of sites in the ring around London, presumably geared to some extent to the Metropolitan as well as the more local market.
- A concentration of sites in east Huntingdonshire, north South Cambridgeshire and west East Cambridgeshire.
- A concentration of sites in Fenland and the western side of King's Lynn and West Norfolk presumably based on traditional agricultural occupation patterns.

While the first two fit reasonably with the London Commuter Belt and Thames Gateway, and the Cambridgeshire housing strategy sub-regions respectively, the third appears to be divided between Cambridgeshire and Rural East Anglia.

This suggests that applying housing strategy sub-regions may not be very helpful.

Table A3.11: Detailed Output from Step 6 (continued)	
	<p>Q2.2: Are there areas where clusters of provision in one LPA adjoin an area with no or little provision?</p>
	<p>The maps show that current provision is often highly clustered. However, this is as much due to clusters of sites within LPA areas as to clusters of sites in adjoining LPAs.</p> <p>Looking at maps reveals some examples of LPAs with high requirements on a ‘need where it arises’ basis which adjoin LPAs with either no or much lower requirements (Basildon: Castle Point and Southend; Epping Forest: Broxbourne and East Hertfordshire; Chelmsford : Maldon). However there are also examples of LPAs with little requirement which adjoin other similar LPAs (Babergh, Tendring, Suffolk Coastal, St Edmundsbury; Broadland and North Norfolk). Given the size of some of the district LPAs, ‘diversion’ of need to another LPA with lower requirements would sometimes involve a considerable distance.</p> <p>For LPAs along the regional boundary, especially authorities around London, South Bedfordshire, Fenland and King’s Lynn & West Norfolk, the potential ‘dispersal’ area could lie outside the East of England. EERA should liaise with other RPBs on the issue.</p> <p>The maps suggest areas where there is some potential for considering ‘diversion’ of requirements, but there are perhaps fewer obvious examples than might have been expected.</p>
<p>Q3: What scope is there for ‘dispersing’ pitch requirement allocations beyond areas with concentrations of existing provision?</p>	
<p><i>Sub-questions</i></p>	
	<p>Q3.1: Is there any indication of the extent of need/requirement which could be ‘dispersed’?</p>
	<p>Given the current uneven distribution of site provision and need arising (mapped under Q2), this is likely to be the core question when allocating pitches at LPA level. There are sound reasons on grounds of equity and choice for creating wider geographical options for Gypsies and Travellers through pitch allocations to ‘new’ areas. However, there is currently no evidence to say what proportion of pitch requirements could be dispersed from where they arise. This is an area where current GTAAAs are not particularly helpful, or indeed where previous recent experience can be drawn upon as a guide since most development has been unplanned.</p> <p>There are possible approaches involving different assumptions. For example:</p> <ul style="list-style-type: none"> • Priority given to those with a local connection in allocating pitches to the ‘home’ LPA. Most GTAAAs comment that the majority of those interviewed had ‘local’ links and had often been in the area for some years. However, the definition of ‘local’ is not spelled out and may be differently interpreted. It would be difficult at regional level to work on local priority assumptions because there is no consistent information on what proportion of requirement this would affect. • Identifying a proportion of the requirement arising in a particular LPA to be re-distributed. This would be quantifiable, but there is no evidence on what an appropriate proportion – a quarter, a third, half etc – might be. <p>We do not have any objective evidence on the amount/proportion of requirement that could reasonably be re-distributed.</p>

Table A3.11: Detailed Output from Step 6 (continued)

	Q3.2: Are there guidelines to determine the area over which requirement might be dispersed?
	<p>It is also not possible to say with any great confidence over what sort of distance, or within what sort of area, requirements could be diverted.</p> <p>In the East of England a starting point would be to identify those LPAs with a high pitch requirement where local factors (such as limited geographical area, Green Belt or a range of settlement and environmental constraints) mean that there may be particular local challenges in accommodating those needs, and where there are significantly lower assessed requirements and/or fewer constraints in adjoining areas. This suggests that the main priorities for re-allocation of requirements might be from Basildon into Brentwood, Castle Point, Rochford and Southend; from South Cambridgeshire into (non-Green Belt) East Cambridgeshire and Huntingdonshire; and from Epping Forest (with the environmental constraints of the Forest) into Broxbourne and East Hertfordshire.</p> <p>There is a potential for positive planning of new areas of site provision which should be sufficiently extensive to create a viable local community where there are employment opportunities and road links for sustainability.</p>
	Q3.3: Can alternative scenarios be devised for appraisal and consultation?
	<p>Given the difficulty of making pitch allocation decisions on the basis of clear evidence, it seems important to ensure that contrasting options are generated for sustainability appraisal and consultation. The views of Gypsies and Travellers would be particularly valuable in indicating likely sustainability. To encourage effective involvement of Gypsies and Travellers in the consultation process, the options must be stated in terms which Gypsies and Travellers understand and can see as genuinely relevant to their lives and choices.</p>
Q4: What are the positive factors for pitch allocations?	
<i>Sub-questions</i>	
	Q4.1: Where do Gypsies and Travellers want to live?
	<p>Unfortunately, GTAAs have not been very successful to date in identifying where Gypsies and Travellers want to live, either in terms of geographical locations or types of area. It seems, not unnaturally, that individual preferences vary and that both predominantly urban and rural authorities can provide locations for sustainable sites.</p> <p>Many Gypsies and Traveller express a desire to live on the edge of small/medium towns or villages. This is partly to be near the countryside and party to achieve some separation from settled neighbours to reduce potential for conflict and preserve cultural identity.</p>
	Q4.2: Where are the main employment centres?
	<p>The prime locational requirement for many Gypsies and Travellers is a market for their services – usually represented by concentrations of the settled community. Thus Gypsy and Traveller work opportunities are likely to be greatest in settlements where the settled communities live and work. Access to prosperous and growing areas will be as attractive to most Gypsies and Travellers as anyone else.</p> <p>We have no further information on this.</p>
	Q4.3: Where are the main housing growth areas?
	<p>Gypsy and Traveller sites should be regarded as a form of residential provision. It is therefore appropriate to consider residential growth areas for the opportunities they provide for site development.</p> <p>We have no further information on this.</p>

Table A3.11: Detailed Output from Step 6 (continued)	
	Q4.4: Where is social inclusion best be fostered?
	At regional scale, considerations of social inclusion argue against remote and isolated locations. We have no further information on this.
	Q4.5: Where are the main transport routes?
	Reasonable proximity to the major road network is important. This probably reinforces the avoidance of remote and isolated locations. We have no further information on this.
Q5: What are the main constraints on site development?	
<i>Sub-questions</i>	
	Q5.1: Are there areas where Gypsies and Travellers do not want to live?
	Avoiding areas with very poor environments or contamination is important at LPA level when identifying locations for sites. There appear to be no significant differences here between considerations in identifying suitable locations for residential development or for Gypsy and Traveller sites. We have no further information on this.
	Q5.2: Where are the main existing built-up areas?
	Existing built-up areas are significant in different ways: <ul style="list-style-type: none"> • potential 'edge' locations are attractive (see above). • existing developed land is less likely to be available for sites, although there may be specific brown-field and regeneration opportunities. • some Gypsies and Travellers specifically say that they do not want to live within an existing settlement where potential for conflict with the settled community is greater. With sensitive planning Gypsy and Traveller sites can be successfully located within existing settlements and there is no reason to avoid LPAs on 'land shortage' grounds where land is available for residential development.
	Q5.3: Where are the main environmental protection areas?
	We are aware that EERA is considering this and have no further comments to make.
	Q5.4: Is Green Belt a relevant consideration?
	Green Belt is clearly a serious consideration. Locally-generated requirements from Gypsy and Traveller populations in the south of the Region will be significantly affected by Green Belt issues. ODPM Circular 01/2006 notes the possibility of reviewing Green Belt boundaries to meet Gypsy and Traveller site needs, but it may be challenging to justify the exceptional circumstances required to justify such changes.

Table A3.11: Detailed Output from Step 6 (continued)

	Q5.5: Is flood risk a relevant consideration?
	We are aware that EERA is considering this and have no further comments to make.
Q6: What is the need for social and affordable site provision?	
<i>Sub-questions</i>	
	Q6.1: What are the tenure preferences?
	<p>It is clear from GTAA's and other evidence that for many Gypsies and Travellers their accommodation ideal is an owner-occupied site owned by the (extended) family. This seems to be equally true in the East of England:</p> <ul style="list-style-type: none"> • The ratio of private to social pitches on authorised sites (at 55/45) is higher in the Region than the national average (see East of England context above). Other things being equal, this suggests that more than half of the regional pitch requirement generated from family growth on existing sites is associated with private sites. There are indications that, while some on social sites aspire to private site development, relatively few Gypsies and Travellers with authorised pitches on private sites, especially those that are family-owned, are looking for social site provision. • The extent of unauthorised development is high in the Region relative to the national average (see East of England context above). Those involved in unauthorised development are directly registering demand for sites they provide for themselves. Unauthorised development contributes about 40 per cent of the regional pitch requirement estimated in Step 3. <p>Together these points suggest that tenure preferences in the Region are likely to be predominantly towards private rather than social sites.</p>
	Q6.2: What is the requirement for local authority/RSL pitch provision?
	<p>This question is obviously important not only for RPBs but also for Regional Housing Boards when making decisions about resource allocation for social site development.</p> <p>There is no hard evidence as to numbers at present, but the following indications in the Region:</p> <ul style="list-style-type: none"> • Despite majority tenure preferences, it is recognised that some Gypsies and Travellers will never be able to provide sites of their own, and some do not want to. • Where waiting lists are quoted in GTAA's (as in Hertfordshire) they have many applicants relative to the likely supply of pitches through turnover and constitute a significant element in assessed need. • The Cambridgeshire Sub-Region GTAA quotes recent site closures and argues for scope for increased social provision. • Social provision is an obvious means of ensuring that new development meets need. • It appears that some Gypsies and Travellers are deterred from public sites because they do not know who their neighbours will be and fear being accommodated alongside people from 'incompatible' groups or families. Good quality, smaller social sites where there is a good chance of building a community among compatible families could make public provision much more popular and increase demand. <p>Together these points suggest that an appropriate mix of new provision might include at least a third and perhaps up to a half of pitches on social sites.</p>

Table A3.11: Detailed Output from Step 6 (continued)	
	Q6.3: What is the requirement for private (affordable) pitch provision?
	<p>In mainstream housing a distinction is made between 'affordable' and 'market' private housing. There are policy mechanisms for providing affordable housing through planning agreements, shared ownership and so on.</p> <p>Tenure preferences suggest widespread aspirations for site ownership among Gypsies and Travellers, but there is little evidence about the extent of effective demand:</p> <ul style="list-style-type: none"> • GTAAs have not been able to provide robust data on earnings and savings amongst Gypsies and Travellers. It is not, therefore, possible to make 'affordability' calculations for the Gypsy and Traveller population. • Current private site development often appears to take place where there is relatively cheap land, sometimes because of planning constraints. Cheap land makes development affordable, even if there are then considerable costs in seeking planning permission. It is not yet clear what will happen to land prices if land is specifically allocated for Gypsy and Traveller site use, or how land for private development is to be brought forward under the new system. Until these points are clarified, land price, and thus the resources needed for purchase and site development, are unknown. <p>In this context, it might be appropriate to treat all private pitch requirements as requirement for affordable rather than market housing. RPBs and Regional Housing Boards might usefully work together with local authorities and other agencies to develop mechanisms for ensuring that new private provision is 'affordable'.</p>

Table A3.12: Information on Transit Need from GTAAs	
Bedfordshire & Luton	
	A requirement of emergency stopping places for 45 households a year . For vulnerable families following eviction and for temporary accommodation for those awaiting permanent pitches.
Cambridgeshire Sub-Region	
	<p>No formal split of requirements made. Tentatively suggest that requirements might have a 2/1 split residential/transit but no evidence is presented. This would imply transit needs for almost 130 pitches. More specifically the report comments that the road network and likely through travel indicates the need for a transit site near Cambridge.</p> <p><i>(Note that in this Report the whole requirement from the Cambridgeshire Sub-regional GTAA has been treated as for residential pitches in the calculations for regional pitch requirements above. If the suggested proportion is treated as for transit need, this would reduce residential requirements by over 100. However we would in that case re-assess the likely robustness of the GTAA estimate and substitute the formula which would have the effect of very slightly increasing overall residential pitch requirements.)</i></p>
Essex	
	Transit need is not considered.
North & East Hertfordshire	
	Need for one 10 pitch transit/emergency stopping place on the basis of records of unauthorised encampments over recent years.
South & West Hertfordshire	
	Three 10 pitch transit sites (30 pitches) would have been capable of accommodating most unauthorised encampments over the last three years. Estimate on the basis of records on unauthorised encampments.
South Norfolk	
	Advocates three 4 pitch transit sites (12 pitches) and specifies general locations. Method of arriving at the estimate is not given and it is presumably based on local knowledge.