

Luton

Gypsy and Traveller Accommodation Assessment



Final Report
September 2015

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Important Note

Following the completion of the Luton GTAA the Government issued a revised Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change in the definition of Gypsies, Traveller and Travelling Showpeople for planning purposes.

It is important for the Council to consider the impact that this change in the definition may have on the overall assessment of need, as this will potentially exclude households who no longer travel.

As the new PPTS has only just been released it is unclear at this point what the practical implications of assessing households against the new definition will be and further guidance from the Government is awaited.

The site interviews indicated that only a small number of households on sites travel on a regular basis, and the likelihood is that the overall level of need may reduce once it is possible to apply the new definition to Gypsy, Traveller and Travelling Showpeople households in Luton.

Contents

1. Executive Summary.....	6
Introduction and Methodology	6
Key Demographic Findings	6
Additional Pitch Needs – Gypsies and Travellers	7
Transit Sites	7
Travelling Showpeople Needs	7
2. Introduction	8
The Study	8
Local Planning Policy in Luton	8
Definitions	9
Legislation and Guidance for Gypsies and Travellers.....	10
Tackling Inequalities for Gypsy and Traveller Communities	13
Funding	13
3. Methodology.....	15
Glossary of Terms.....	15
Stage 1: Desk-Based Research.....	15
Stage 2: Stakeholder Engagement.....	16
Stage 3: Working Collaboratively with Neighbouring Planning Authorities.....	16
Stage 4: Survey of Travelling Communities	17
Stage 5: Bricks and Mortar Households	17
Stage 6: Current and Future Pitch/Plot Needs	18
Stage 7: Conclusions	19
4. Gypsy, Traveller and Travelling Showpeople Sites and Population	20
Introduction.....	20
Sites and Yards in Luton	21
Caravan Count	22
5. Stakeholder Engagement.....	23
Introduction.....	23
Accommodation for Gypsies and Travellers.....	23
Unauthorised Encampments and Transit Provision	24
Accommodation for Travelling Showpeople	24

Cross Border Issues and the Duty to Cooperate	24
Neighbouring Authorities	25
Key Findings	25
Accommodation and Need in Neighbouring Authorities	25
6. Survey of Travelling Communities	28
Interviews with Gypsies and Travellers	28
Public Site	29
Travelling Showpeople	29
Unauthorised Encampments	30
Traveller Households at Stopsley Mobile Home Park	30
Travelling Community Characteristics	30
7. Current and Future Pitch Provision	32
Pitch Provision	32
Supply	32
Current Need	32
Future Need	33
Current Gypsy and Traveller Site Provision - Supply	33
Additional Pitch Provision: Current Need	34
Current Unauthorised Sites and Encampments	34
Concealed Households	35
Bricks and Mortar	35
Waiting Lists	36
Temporary Planning Permissions	36
Population and Household Growth	36
Movement to and from sites and migration activity	37
Overall Need for Luton	40
Split to 2030 in 5 year Time Periods	40
Transit/Emergency Stopping Site Provision	41
Need for Travelling Showpeople Plots	42
9. Conclusions	44
Gypsy and Traveller Future Pitch Provision	44
Transit Sites	44
Travelling Showpeople Needs	44

Appendix A: Glossary of Terms 45

Appendix B: Sites and Yards in Luton (July 2015) 47

Appendix C: Site Record Form 48

Appendix D: Bricks and Mortar Advert..... 51

Appendix E: Technical Note on Household Formation and Growth Rates 52

1. Executive Summary

Introduction and Methodology

- 1.1 The primary objective of the 2015 Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Luton. The GTAA provides a robust and credible evidence base which can be used to aid the implementation of Development Plan policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period to 2030. The outcomes of this study supersede the outcomes of the Luton Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment that was published in December 2013.
- 1.2 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in Luton through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community. A total of 18 interviews were completed with Gypsies, Travellers and Travelling Showpeople living on sites and yards. Through efforts to identify households living in bricks and mortar 2 contacts were interviewed who were able to provide details about their households and 4 other relatives who are also currently living in bricks and mortar. A total of 12 telephone interviews were also completed with Officers from Luton Borough Council and Officers from neighbouring local authorities.
- 1.3 The baseline date for the study is July 2015.

Key Demographic Findings

- 1.4 Ethnicity data was captured from all of the households that were interviewed on the Gypsy and Traveller sites. The majority of households stated that they were English Travellers and the remainder were Irish and Scottish Travellers.
- 1.5 Demographic information showed a mixed range of ages across the sites, though a much larger proportion of the population were younger when compared to the overall population of Luton (2011 Census).
- 1.6 The interviews identified 47 residents living on the Gypsy and Traveller sites. This was made up of 26 adults and 21 children and teenagers aged under 18. This equates to 55% adults and 45% children and teenagers. Although not a direct comparison, data from the Census for Luton as a whole (the settled community and the Gypsy or Irish Traveller community) and for Gypsies or Irish Travellers within the Borough has been compared to the site population. This shows a significant difference between the site population and that of the Luton population as a whole, and less of a difference between the site population and the Census Gypsy or Irish Traveller population for Luton.

Additional Pitch Needs – Gypsies and Travellers

- 1.7 Based upon the evidence presented in this study the pitch provision needed for Gypsies and Travellers to 2030 in Luton is for **14 additional pitches**, as detailed in the table below. These figures should be seen as the projected amount of provision which is necessary to meet the statutory obligations towards identifiable needs of the Gypsy and Traveller population arising in Luton. A detailed breakdown which sets out the components that make up this additional need, together with any other issues that have been taken into consideration are included in Chapter 7 of this report.
- 1.8 The study has assumed that the need arising from unauthorised encampments and concealed households is met in the first 5 years, less a supply of 5 pitches that were identified on the public site during the first 5 years of the Local Plan period. In addition total new household formation of 11 is apportioned over the 5 year time periods based on a net compound growth rate of **2.00%**.

Figure 1
Extra net pitch need in Luton

	2015-2020	2020-2025	2029-2030	Total
Luton	6	4	4	14

- 1.9 It is also important for the Council to consider the impact that a potential change in the definition of Gypsies and Travellers may have on the overall assessment of need if this would result in the exclusion of those who no longer travel. The site interviews indicated that only a small number of households on sites travel on a regular basis.

Transit Sites

- 1.1 Given the levels of unauthorised encampments over the summer and winter months that have been identified in Luton it is recommended that there is **still a need for the Council to deliver new public transit provision for 10 pitches**.

Travelling Showpeople Needs

- 1.2 The outcomes of the study identified that the residents on one of the yards are aware that the existing yard is becoming over-crowded. However the residents stated that they own land in a nearby local authority and are exploring whether they can get planning permission to develop a proportion of this land to provide the family with a new yard to meet their needs. The outcomes of the study are that the other yard is used predominantly for storage purposes. Therefore **it is not recommended that the Council should provide for any additional Traveling Showpeople plots at this time**. The situation regarding the potential development of a new yard in an adjacent local authority should however be closely monitored.

2. Introduction

The Study

- 2.1 Opinion Research Services (ORS) were appointed by Luton Borough Council (the Council) in April 2015 to complete a robust and up-to-date needs assessment of accommodation for Gypsies and Travellers to 2030. The outcomes of this study supersede the outcomes of the Luton Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment that was published in December 2013.
- 2.2 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG), and Planning Policy for Traveller Sites (PPTS) 2012.
- 2.3 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in Luton. It is a robust and credible evidence base which can be used to aid the implementation of development plan policies and the provision of Traveller pitches and plots for the period to 2030. As well as identifying current and future permanent accommodation needs, it will also seek to identify whether or not the Council needs to plan for the provision of transit sites or emergency stopping places.
- 2.4 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.5 The baseline date for the study is July 2015.

Local Planning Policy in Luton

Luton Draft Local Plan for Public Consultation 2011-2031

- 2.6 The Draft Local Plan states that a Gypsy and Travellers Accommodation Assessment (GTAA) was undertaken in 2006 and a review of this assessment (this study) is currently underway to establish the need for Gypsy, Traveller and Travelling Showpeople accommodation in the borough. Sufficient sites to accommodate any required pitches (if any are needed), identified through the study would need to be allocated through the Local Plan or an Allocations Development Plan Document (DPD). As the results of the GTAA are yet to be completed, sites have not been proposed in this draft of the Plan.
- 2.7 It goes on to state that a criteria-based policy is required to ensure that existing GTTS sites are safeguarded for that use and that the provision of accommodation for Gypsies, Travellers and Travelling Showpeople is located in a sustainable manner. In applying the policy, the extent to which a traditional lifestyle and a

settled base can contribute to sustainable development will be considered. The location of new pitches must enable the residents to access services including schools and health facilities in the same way that residents of new houses need to be able to access community facilities. In addition Gypsy and Traveller sites need good access to the road network as they often need to move larger vehicles as part of their livelihood and way of life.

Policy LP 20 Gypsies, Travellers & Travelling Showpeople

2.8 The existing Gypsy and Traveller site at St Thomas' Road and Traveller Showperson site at 14 Wigmore Lane is safeguarded for these purposes (as identified on the policies map). Gypsy and Traveller and Travelling Showpeople pitches and plots, including provision for a transit Gypsy and traveller site, will be permitted or allocated in accordance with current government policy to meet the needs identified in the Gypsies and Travellers Accommodation Assessments updated as necessary. Planning permission will be granted for permanent or transit Gypsy/ Traveller provision where the following criteria can be met:

- i. the site has reasonable access to shops, schools and other facilities; and
- ii. the site has adequate road access and is well related to the primary road network; and
- iii. the site is on previously developed or underused land and is not allocated for another use; and
- iv. hardstanding and basic facilities, including electricity, water supplies, sewage disposal and waste collection, are provided on site; and
- v. there would be no unacceptable effect on the environment; and
- vi. in the case of Travelling Showpeople sites, the site includes sufficient space for storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers.

Definitions

2.9 For the purposes of the planning system, the current definition¹ for Gypsies and Travellers means:

Persons of nomadic habit of life, whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such. (Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), March 2012).

2.10 Within the main definition of Gypsies and Travellers, there are a number of main cultural groups which include:

- » Romany Gypsies
- » Irish Travellers
- » New (Age) Travellers.

¹ Changes to this definition were the subject of a consultation by DCLG that ended in November 2014

- 2.11 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010.
- 2.12 Alongside Gypsies and Travellers, a further group to be considered is Travelling Showpeople. They are defined as:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependant's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller Sites, DCLG, March 2012).

Legislation and Guidance for Gypsies and Travellers

- 2.13 Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
- » Planning Policy for Traveller Sites (PPTS), 2012
 - » National Planning Policy Framework (NPPF), 2012
 - » Planning Practice Guidance (PPG)
 - » Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007
 - » The Human Rights Act 1998 (when making decisions and welfare assessments)
 - » The Town and Country Planning Act, 1990
 - » Criminal Justice and Public Order Act, 1994
 - » Anti-social Behaviour Act, 2003
 - » Planning and Compulsory Purchase Act, 2004
 - » Housing Act, 2004 (which requires local housing authorities to assess the accommodation needs of Gypsies and Travellers and Showpeople as part of their housing needs assessments. This study complies with this element of government guidance)
 - » Housing Act, 1996 (in respect of homelessness).
- 2.14 To focus on Gypsies and Travellers, the Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of planning for Gypsy and Traveller site provision. This repealed the duty of Local Authorities from the Caravans Act 1968 to provide appropriate accommodation for Gypsies and Travellers. However, at this time Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.
- 2.15 For site provision, the previous Government guidance focused on increasing site provision for Gypsies and Travellers and Travelling Showpeople and encouraged Local Authorities to have a more inclusive approach within their Housing Needs Assessment. The Housing Act 2004 Section 225 requires Local Authorities to identify the need for Gypsy and Traveller sites, alongside the need for other types of housing, when

conducting Housing Needs Surveys. Therefore, all Local Authorities were required to undertake accommodation assessments for Gypsies and Travellers and Travelling Showpeople either as a separate study such as this one, or as part of their main Housing Needs Assessment.

- ^{2.16} Local Authorities were encouraged rather than compelled to provide new Gypsy and Traveller sites by central Government. Circular 1/06 'Planning for Gypsy and Traveller Caravan Sites', released by the DCLG in January 2006, replaced Circular 1/94 and suggested that the provision of authorised sites should be encouraged so that the number of unauthorised sites would be reduced.
- ^{2.17} The Government announced that Planning for Gypsy and Traveller Caravan Sites (Circular 01/06) was to be repealed, along with the Regional Spatial Strategies which were used to allocate pitch provision to local authorities. The DCLG published 'Planning Policy for Traveller Sites' in March 2012 which set out the Government's policy for traveller sites. It should be read in conjunction with the National Planning Policy Framework.
- ^{2.18} A letter from the Parliamentary Under Secretary of State for the Department for Communities and Local Government in March 2014 helped to clarify the Government's position on household formation rates and also suggested that current planning guidance will soon be updated and stated:

'Following the recent consolidation of planning guidance we will be seeking to consult on updating and streamlining the remaining elements of traveller planning practice guidance and also on strengthening traveller planning policy. We will ensure that any new guidance supports councils to accurately assess their needs and would remove ambiguous references to the 3% growth rate figure, which, I stress, is only illustrative. This would, once published, have the effect of cancelling the last Administration's guidance.'

'I can confirm that the annual growth rate figure of 3% does not represent national planning policy. The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure, though in some cases we are aware that inspectors have, in considering the level of unmet local need when demonstrating specific traveller appeals, used the 3% growth rate figure in the absence of a local authority's own up-to-date assessment of need.'

- ^{2.19} More recently (Sept–Nov 2014) DCLG launched a consultation on proposed changes to government policy on Planning and Travellers. This consultation addressed a number of issues including ensuring that the planning system applies fairly and equally to both the settled and traveller communities; further strengthening protection of sensitive areas and Green Belt; and addressing the negative impact of unauthorised occupation. It also set out how local authorities should assess future Traveller accommodation needs in Annex A of the consultation document and this is very similar to the approach set out in this study. The consultation ended in November 2014 and the Council will need to be aware of the implications should subsequent changes to national policy and guidance be made.

Planning Policy for Traveller Sites (PPTS)

^{2.20} Planning Policy for Traveller Sites, which came into force in March 2012, sets out the direction of Government policy. Planning Policy for Traveller Sites is closely linked to the National Planning Policy Framework². Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Pages 1-2):

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

^{2.21} In practice, the document states that (PPTS Page 3):

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

^{2.22} PPTS goes on to state (Page 3) that in producing their Local Plan local planning authorities should:

- » *Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*
- » *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*

² <http://planningguidance.planningportal.gov.uk/>

- » *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).*
- » *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.*
- » *Protect local amenity and environment.*

^{2.23} Local Authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' also notes on Pages 3-4 that:

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

Tackling Inequalities for Gypsy and Traveller Communities

^{2.24} In April 2012 the Government issued a further document relating to Gypsies and Travellers titled 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers' (DCLG April 2012).

^{2.25} The aforementioned report contains 28 commitments to help improve the circumstances and outcomes for Gypsies and Travellers across a range of areas including:

- » Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children.
- » Identifying ways to improve health outcomes for Gypsies and Travellers within the proposed new structures of the NHS.
- » Encouraging appropriate site provision; building on £60 million Traveller Pitch Funding and New Homes Bonus incentives.
- » Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system.
- » Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities, and working with the financial services industry to improve access to financial products and services.
- » Sharing good practice in engagement between Gypsies and Travellers and public service providers.

Funding

^{2.26} In 2011 Government introduced financial incentives for new affordable pitch provision in the form of the New Homes Bonus. For all new pitches on Local Authority or Registered Provider-owned and managed sites, Local Authorities are eligible for a New Homes Bonus equivalent to Council Tax (based on the national

average for a Band A property), plus an additional affordable homes premium of £350 per annum for six years. This equates to around £8,000 per pitch.

- ^{2.27} Direct grant funding was also available for Gypsy and Traveller sites. The Homes and Communities Agency (HCA) took over delivery of the Gypsy and Traveller Sites Grant programme from DCLG in April 2009. Since then they have invested £16.3million in 26 schemes across the country to provide 88 new or additional pitches and 179 improved pitches, through bids from Local Authorities, Housing Associations and Traveller community groups working with Registered Providers.
- ^{2.28} The HCA has now confirmed allocations for all of its £60 million of future funding through the Traveller Pitch Funding and New Homes bonus incentives which will support 96 projects around the country for the provision of new Gypsy and Traveller sites and new pitches on existing sites, as well as the improvement of existing pitches. For the HCA 2015-18 Affordable Housing Programme there is no ring-fenced funding, but proposals for Gypsy and Traveller pitches will be considered within the programme. The table below shows the current allocation outside of London.

Figure 2
HCA Grant Allocations for New Pitches (Source: HCA 2014)

Local Authority Area	Amount of money	Number of new pitches
East and South East	£6,218,381	91
Midlands	£14,126,576	216
North East, Yorkshire and The Humber	£15,328,694	375
North West	£3,850,763	108
South and South West	£16,713,954	309
Total	£56,238,368	1,099

- ^{2.29} While all HCA funds for Gypsy and Traveller pitches have now been allocated, further funding may become available as a result of slippage over the course of the programme. Local authorities and Registered Providers are advised to continue to work closely with HCA area teams to develop their proposals should any further funding become available as a result of some funded schemes not proceeding.
- ^{2.30} In addition to HCA funding and the New Homes Bonus, other sources of funding should be considered, for example S106 funding that has been identified to fund the provision of new pitches in other local authorities, working closely with Registered Providers, and encouraging the development or expansion of other private sites or yards.

3. Methodology

- 3.1 This section sets out the methodology that has been followed to deliver the outputs for this study. Over the past 10 years ORS has developed a methodology which provides the required outputs from a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment and this has been updated in light of Planning Policy for Traveller Sites, as well as recent changes set out by the Planning Minister in March 2014, with particular reference to new household formation rates, and the recent DCLG consultation. This is an evolving methodology that has been adaptive to recent changes in planning policy as well as the outcomes of Local Plan examinations and planning appeals that ORS have been involved in. More recently ORS were approached by the Welsh Government to provide advice to support the development of new Gypsy and Traveller Policy for Wales on the basis of our detailed work to identify an evidence base for household formation for the Gypsy and Traveller population in the UK. ORS also have considerable experience in undertaking GTAA studies across the UK; having completed studies for over 110 local authorities since PPTS was published in 2012.
- 3.2 The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Glossary of Terms

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

Stage 1: Desk-Based Research

- 3.4 At the outset of the project ORS researched the background to the Gypsy, Traveller and Travelling Showpeople population in Luton. This comprised the collation of a range of important secondary data from the following available sources:
- » Census data.
 - » Details of all authorised sites and yards, together with waiting lists for public sites.
 - » Biannual Traveller Caravan Counts.
 - » Records of any unauthorised sites and encampments.
 - » Relevant information from planning, housing, education, community safety, environmental health and health services.
 - » Information on planning applications and appeals.
 - » Information on any other current enforcement actions.
 - » Existing GTAAs and other relevant local studies.
 - » Existing policy, guidance and best practice.

- 3.5 This data was used to inform the stakeholder interviews and fieldwork and has also been analysed in conjunction with the outcomes of the other elements of the study to allow ORS to complete a thorough review of the needs of Travelling Communities in Luton.

Stage 2: Stakeholder Engagement

- 3.6 This study included extensive local stakeholder engagement. This involved a series of in-depth telephone interviews with Planning, Housing, Legal, Parks, Equalities and Gypsy Roma Education Officers from the Council.
- 3.7 Contact was made with the Gypsy Council but they refused to participate in the study unless they received payment for their time. Despite this ORS are confident that the outcomes of the study are robust due to other successful stakeholder engagement.
- 3.8 The stakeholder interviews covered the following key topics:
- » What dealings or relationships people have with Gypsies, Travellers and Travelling Showpeople.
 - » Experiences of any particular issues in relation to Gypsies, Travellers and Travelling Showpeople.
 - » Awareness of any Gypsy and Traveller sites and Travelling Showpeople yards either with or without planning permission and whether this varies over the course of a year.
 - » Any trends people may be experiencing with regard to Gypsies, Travellers and Travelling Showpeople (e.g. increase in privately owned sites or temporary sites).
 - » What attracts Gypsies, Travellers and Travelling Showpeople to an area.
 - » Identification of any seasonal fluctuations that may occur.
 - » Awareness of any occurrences of temporary stopping by Travellers.
 - » Identifying the relationship between the settled and travelling communities.
 - » Awareness of any Travellers currently residing in bricks and mortar accommodation.
 - » Awareness of any cross boundary issues.
 - » Any other comments on the Gypsy, Traveller and Travelling Showpeople community in the study area.

Stage 3: Working Collaboratively with Neighbouring Planning Authorities

- 3.9 Interviews were also conducted with officers from neighbouring planning authorities. The interviews ensure that the GTAA addresses wider issues that may impact on the outcomes of the study. These stakeholders were identified as part of the desk-based review and in conjunction with officers from the Council. Interviews were conducted with officers from the following neighbouring authorities and covered the same broad issues as the local stakeholder interviews:
- » Hertfordshire County Council
 - » Central Bedfordshire

- » Dacorum
- » North Hertfordshire
- » St Albans

Stage 4: Survey of Travelling Communities

- ^{3.10} Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and encampments in Luton. This work identified 1 public site (20 pitches), no private sites and no unauthorised sites. In addition 2 Travelling Showpeople yards were identified (7 plots). It was also identified that there are a number of Gypsy and Traveller households living on the Stopsley Mobile Home Park adjacent to the public site at St Thomas's Road. In addition it was identified that there are 2 family groups living in approximately 12 caravans that frequently live on unauthorised encampments across Luton. Full details of the sites can be found in **Appendix B**.
- ^{3.11} ORS sought to undertake a full demographic study of *all* occupied pitches and plots as part of our approach to undertaking the GTAA as our experience suggests that a sample based approach very often leads to an under-estimate of current and future needs which can be the subject of challenge at subsequent appeals and examinations. All occupied pitches and plots were visited by experienced ORS researchers who conducted interviews with as many residents as possible to determine their current demographic characteristics, whether they have any current or likely future accommodation needs and how these may be addressed, and whether there are any concealed households or doubling-up. The interview was based around an approach that was agreed with the Council. The Visit Record Form can be found in **Appendix C**. This approach also allowed the interviewers to identify information about the pitches and plots that could help support any future work on possible site expansion by undertaking an overall assessment of each site or yard.
- ^{3.12} Where it was not possible to undertake an interview, researchers captured as much information as possible site from site owners or from residents on adjacent pitches or plots.
- ^{3.13} All of the fieldwork on the public site was undertaken during April 2015, with further fieldwork at the mobile home park and with households living in bricks and mortar completed in July 2015.

Stage 5: Bricks and Mortar Households

- ^{3.14} In our experience many Planning Inspectors and Appellants question the accuracy of GTAA assessments in relation to those Gypsies and Travellers living in bricks and mortar accommodation who may wish to move on to a site. ORS feel that the only practical approach is to take all possible measures to identify as many households in bricks and mortar who may want to take part in an interview to determine their future accommodation needs, including a wish to move to a permanent pitch in the study area.
- ^{3.15} Contacts in bricks and mortar were sought through a wide range of sources including speaking with people living on existing sites to identify any friends or family living in bricks and mortar who may wish to move to a site, intelligence from the Council and other local stakeholders. Adverts were also placed prominently on the Travellers Times website.³

³Details can be found in **Appendix D**

- 3.16 Through this approach we endeavoured to do everything within our means to publicise that a local study was being undertaken in order to give all households living in bricks and mortar who may wish to move on to a site the opportunity to make their views known to us.
- 3.17 As a rule we do not extrapolate the findings from our fieldwork with Gypsies and Travellers living in bricks and mortar households up to the estimated Gypsy and Traveller bricks and mortar population as a whole, and work on the assumption that those wishing to move will make their views known to us based on the wide range of publicity that we put in place.

Stage 6: Current and Future Pitch/Plot Needs

- 3.18 The methodology used by ORS to calculate future pitch and plot needs has been developed over the past 10 years and has drawn on lessons from both traditional housing needs assessments and also best practice from Gypsy, Traveller and Travelling Showpeople Accommodation Assessments conducted across the country.
- 3.19 To identify need Planning Policy for Traveller Sites requires an assessment for current and future pitch needs, but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue for residential pitches is to compare the supply of pitches available for occupation with the current and future needs of the population. The key factors in each of these elements are set out below and will be set out in more detail in Chapter 7 of this report:

Supply of Pitches

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within the study period (unimplemented sites).
- » Pitches to be vacated by households moving to bricks and mortar.
- » Pitches to be vacated by households moving from the study area (out-migration).

Current Need

- 3.20 Total current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space available in the study area, is made up of the following. It is important to address issues of double counting:
- » Households on unauthorised sites or encampments for which planning permission is not expected.
 - » Concealed households/doubling-up/over-crowding.
 - » Households in bricks and mortar wishing to move to sites or yards.
 - » Households on waiting lists for public sites.

Future Need

- ^{3.21} Total future need is the sum of the following three components:
- » Households living on sites with temporary planning permissions.
 - » Population and household growth.
 - » Movement to and from sites.
- ^{3.22} Household formation rates are often the subject of challenge at appeals or examinations. We agree with the position now being taken by DCLG (as set out in the Introduction to this report) and firmly believe that any household formation rates should use a **robust local evidence base**, rather than simply relying on precedent. This is set out in more detail later in Chapter 7 of this report.
- ^{3.23} All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers, and for Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified in 5 year periods to 2030.

Stage 7: Conclusions

- ^{3.24} This stage of the study will draw together the evidence from Stages 1 to 6 to provide an overall summary of the accommodation needs for Gypsies, Travellers and Travelling Showpeople in Luton.

4. Gypsy, Traveller and Travelling Showpeople Sites and Population

Introduction

- 4.1 One of the main considerations of this study is provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople. A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans, but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are needed in Luton.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly-provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing).
- 4.3 The alternative to public residential sites are private residential sites and yards for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other forms of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the land owner, but for which they do not have planning permission to use for

residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

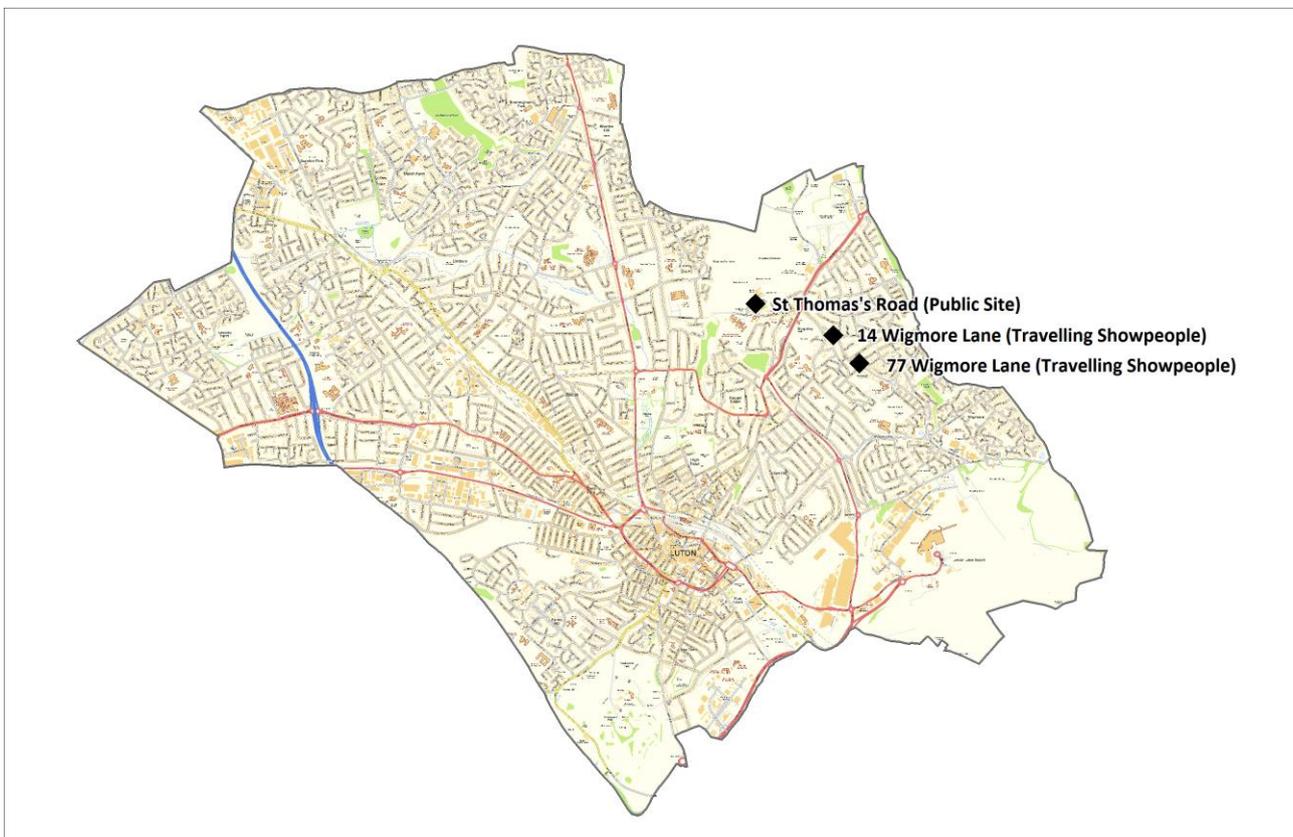
Sites and Yards in Luton

- 4.6 In Luton there is 1 public site with 20 pitches. The site was established in 1970 and was refurbished in 2005 at a cost of £780,000 which was 75% funded by the Government. The site has planning permission for a combination of 20 single and double pitches which can accommodate 26 caravans on hardstanding's. There are also no private sites with permanent planning permission; no sites with temporary planning permission; no unauthorised developments; and 2 small Travelling Showpeople yards. There is no transit provision in Luton. Further details can be found in Chapter 6 and **Appendix B**.

Figure 3
Total amount of authorised provision in Luton (July 2015)

Category	Sites/Yards	Pitches/Plots
Private with permanent planning permission	0	0
Private sites with temporary planning permission	0	0
Public Sites (Council and Registered Providers)	1	20
Public Transit Provision	0	0
Private Transit Provision	0	0
Travelling Showpeople Provision	2	7

Map 1
Indicative Location of Sites and Yards in Luton (July 2015)



Caravan Count

- 4.7 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year, and reported to DCLG. This is a statistical count of the number of *caravans* on both authorised and unauthorised sites across England. With effect from July 2013, DCLG has renamed the 'Gypsy and Traveller Caravan Count' as the 'Traveller Caravan Count.' This includes caravans lived in by both ethnic Gypsies and Travellers and non-Gypsies and Travellers.
- 4.8 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and that any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out in Chapter 7.

5. Stakeholder Engagement

Introduction

- 5.1 To be consistent with the guidance set out in Planning Policy for Traveller Sites and the methodology used in other GTAA studies that ORS have undertaken a stakeholder engagement programme was undertaken to complement the information gathered through the desk-based research and interviews with members of the travelling community.
- 5.2 The Council identified stakeholders which included Housing Providers, Gypsy and Traveller and Travelling Showpeople representatives, support services, and relevant Council officers from Housing, Planning, Legal, Parks, Equalities and Gypsy Roma Education, and neighbouring Local Authorities. ORS reviewed this list for consistency with other studies to ensure that it was comprehensive and fair. ORS interviewed 12 stakeholders which is viewed to be satisfactory and consistent with similar GTAAs that ORS have completed.
- 5.3 Themes covered in the interviews included: the need for additional accommodation provision and facilities; travelling patterns; the availability of land; accessing services; and work being done to meet the needs of Gypsies, Travellers and Travelling Showpeople.
- 5.4 Importantly, this element of the study provided an opportunity for the research team to speak to stakeholders who are likely to be in contact with housed Gypsy, Travellers and Travelling Showpeople, with the aim of identifying accommodation needs resulting from this group.
- 5.5 The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders. In all cases they reflect the views of the individual concerned, rather than the official policy of their Council. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used.

Main Findings

Accommodation for Gypsies and Travellers

- 5.6 Stakeholders were generally positive about the quality of accommodation on the existing site at St. Thomas's Road, and felt that it was meeting the needs of those on currently living on the site. However, the site is currently at capacity, and stakeholders noted that vacancies are very rare. One stakeholder was aware of some overcrowding on the site.
- 5.7 The site on St Thomas's road is situated at the back of the Stopsley Mobile Home Park and one stakeholder was aware of a number of Gypsy and Traveller families who had moved onto the mobile home park due to the shortage of alternative sited accommodation and the proximity to the traveller site. The stakeholder

was of the view that this was evidence of further need within the borough and was concerned that this could lead to potential tensions between the traveller community and those on the mobile home park.

- 5.8 No stakeholders were aware of any unauthorised developments in the area.
- 5.9 Most stakeholders were unaware of the size of and the needs of the housed traveller population. One stakeholder who works with community suggested there are Gypsies and Travellers in bricks and mortar accommodation, and felt that many of these households were living in bricks and mortar accommodation from necessity, and would prefer to live on a site. The stakeholder reported that those travellers who live in bricks and mortar accommodation, sometimes after living on a site for many years, often find it difficult to integrate, which sometimes caused problems with neighbours and had difficulties adapting to bricks and mortar accommodation.

Unauthorised Encampments and Transit Provision

- 5.10 When asked about short-term unauthorised encampments most stakeholders were aware of two groups of families who move around Luton on a continual basis and whose children attend a local school in the area. A stakeholder who is in contact with both families estimated the need for approximately 12 caravans. As a result of a lack of an alternative site, the authority is forced to move the families on a regular basis, in the instance the authority has to undertake enforcement action this costs approximately £2,000 each time and can take up to four days. In addition, if the encampment is on public land i.e. a car park, it could mean a loss of Council revenue. It is believed that a transit site would not meet their needs as they are looking for a permanent site in the area.
- 5.11 More generally, unauthorised encampments are said to be an issue particularly during the summer months (May – September). Stakeholders reported that most of those inhabiting these encampments had family in the Luton area – either on the St. Thomas’s Road site or in bricks and mortar accommodation. Stakeholders reported large groups of travellers arriving on unauthorised sites in order to attend family events, such as christenings, weddings and funerals. However, one stakeholder also stated that some travellers visited the area to seek employment opportunities. Stakeholders also reported that many of those on unauthorised encampments had travelled from Ireland.
- 5.12 Most stakeholders supported the provision of a site or area which serves the more transient population, but most felt that it was very unlikely that a suitable, available and affordable site exists in Luton given the land constraints in the area.

Accommodation for Travelling Showpeople

- 5.13 Stakeholders had no knowledge about the accommodation needs of the Travelling Showpeople community in Luton.

Cross Border Issues and the Duty to Cooperate

- 5.14 All stakeholders were of the view that Luton is complying with the Duty to Cooperate. Most agreed that the Gypsy and Traveller community within the borough is local to the area. However, one stakeholder revealed during an interview with took place in June that the families who move around Luton had moved out of the

area, so there could possibly be the potential to work with neighbouring authorities concerning the needs of these families. That said it was not raised as an issue by any of the officers in the neighbouring areas.

- ^{5.15} A Strategic Oversight Group was held on 13th May 2015 and included representations from Bedfordshire Police and Central Bedfordshire, Bedford and Luton Councils. This group will look at updating the joint unlawful encampment policy.

Neighbouring Authorities

- ^{5.16} As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate (S.110 Localism Act 2011) on strategic planning issues that cross administrative boundaries. In order to explore issues relating to cross border working, ORS interviewed an Officer from Hertfordshire County Council and Officers from the four local authorities that neighbour Luton: Central Bedfordshire; Dacorum; North Hertfordshire; and St Albans. In addition, ORS has completed accommodation assessments for three of the four authorities and are in the process of completing a study for St Albans and some of the information obtained during these studies has been incorporated into the section below.

Key Findings

Accommodation and Need in Neighbouring Authorities

Central Bedfordshire Council

- ^{5.17} As at April 2015 there are 261 pitches for Gypsy and Travellers including three Council run sites. This has increased from the 247 pitches which were recorded in January 2014 for the GTAA. There are 39 plots for Travelling Showpeople.
- ^{5.18} There are four tolerated sites (3 of which are Travelling Showpeople yards) and 2 unauthorised developments (1 of which is a Travelling Showpeople yard). There are three pitches on one site with temporary planning permission.
- ^{5.19} The GTANA undertaken by ORS in 2013 identified that Central Bedfordshire needed a total of 157 additional Gypsy and Traveller pitches and 22 additional plots to meet the needs the Travelling Showpeople community to 2031. Since publishing the report the Council have been working hard to progress identification of sites in order to meet the identified need.
- ^{5.20} There are various short term unauthorised encampments and occur fairly regularly on car parks. Reasons given for travelling through the area include; 'on holiday; 'here for a wedding'; visiting family; and 'we have nowhere else to go'. The GTAA identified a need for a transit site as this would enable the Council to use the 62A provision should unauthorised encampments occur. However, there has been no allocation in the Gypsy and Traveller Plan for a transit site and the officer explained that it is an area which requires further work.

Dacorum Borough Council

- 5.21 All the Gypsy and Traveller sites in the area are publicly owned and managed by Hertfordshire County Council. There are 30 permanent pitches with a capacity of up to 60 caravans at Cherry Trees Lane, Hemel Hempstead site and six pitches at a smaller site in Long Marston with a capacity of 12 caravans.
- 5.22 There are two yards for Travelling Showpeople totalling 11 plots. One of Travelling Showpeople plots has a temporary planning permission, while the other five plots at Hogpits Bottom, Flaunden have no formal permission, but where long-term occupation has seen their status become lawful.
- 5.23 The officer was aware of very few unauthorised encampments and, when they do occur, they are usually attending a funeral in the area and stay a few days before moving on.
- 5.24 In terms of Travellers living in bricks and mortar accommodation, the officer explained that this information has been difficult to obtain and had identified a small amount, two of which they identified wanted to move onto a public site.
- 5.25 A GTANA was undertaken in Dacorum in 2012 and identified a need of 17 additional pitches over a 14 year period to 2026. The Council have just completed their Pre-submission consultation on site allocations Development Plan Document (DPD). There is a provision for 3 new sites as part of the Local Allocations – two proposed sites at Hemel for a seven pitch site (West Hemel) and a five pitch site (Marchmont Farm), and a five pitch site is planned to the west of Tring. This means there are a total of 17 new pitches being provided as part of housing developments planned for the area in order to meet the identified need.

North Hertfordshire District Council

- 5.26 There are two private sites in North Hertfordshire; one with permanent and one with temporary planning permission. There are currently no plots for Travelling Showpeople and no identified need resulting from the community.
- 5.27 The study concluded that there are very few unauthorised encampments which occur in North Hertfordshire and therefore the study did not recommend that separate transit provision was needed although there was scope to allow transit site provision linked to the two private sites in the area.
- 5.28 In terms of Travellers living in bricks and mortar accommodation, the representative for the area was unaware of any housed Travellers and explained that: the census figure does not show a much higher number than those living on site provision; and the waiting list for Hertfordshire County Council also suggests that there aren't anyone living within the North Hertfordshire area who are waiting for a public site.
- 5.29 An updated GTANA was undertaken by ORS in July 2014 and the estimated extra pitch provision that is needed over the next 19 years is seven pitches. However, there is an assumption that six current pitches with a temporary permission become permanent permission and non-Travellers vacate pitches they currently occupy.

St Albans City and District Council

- 5.30 Overall in St Albans there are three public sites, seven private sites with permanent planning permission, and two private sites with temporary planning permission. One unauthorised site was identified which is classified by the Council as tolerated for planning purposes. These provide a total of **78 residential pitches in St Albans** as of September 2014. One Travelling Showpeople yard was identified which is tolerated for planning purposes and has two plots.
- 5.31 The officer reported that roadside encampments do not regularly occur in the area and there has been a decrease in recent years. However, Hertfordshire is believed to be an attractive area for Gypsies or Travellers to find work. There is currently no public transit provision – the nearest being the site at South Mimms.
- 5.32 A new GTANA for St Albans is due to be published in September 2015.

Cross Border Considerations

- 5.33 Officers representing neighbouring authorities were asked to highlight any cross border issues which they feel Luton should consider when thinking about Gypsy and Traveller need. All those officers interviewed felt that their authority was complying with the Duty to Cooperate.
- 5.34 In the preparation of its Gypsy and Traveller Plan, Central Bedfordshire have met with officers from the adjoining planning authorities, to provide an update on the Central Bedfordshire Gypsy and Traveller Plan, best sharing practises, and to agree the way forward. Possible joint working opportunities in terms of conducting joint studies when the next GTAA was due were discussed.
- 5.35 The Council have also held a joint meeting with all neighbouring planning authorities in March 2014 to provide them with an update on progress on the Gypsy and Traveller Plan and identify ways in which to move forward. Since the Gypsy and Traveller Plan was withdrawn, the Council are not aware of any other cross-border issues relating to Gypsy and Traveller issues.
- 5.36 The officer representing **North Herts** had been involved in discussions regarding population and housing targets with all its neighbouring authorities and have progressed Duty to Cooperate meetings with most.
- 5.37 The officer representing **St Albans** referred to general meetings with neighbours and explained that issues relating to Gypsies and Travellers will be raised as appropriate. The officer highlighted the existence of the Herts Planning Group which holds meetings every two months and will discuss planning issues including issues relating to Gypsies and Travellers including sharing approaches and the outcomes of recent public examinations of Local Plans. It was agreed that meetings with other authorities such as Luton and Central Bedfordshire do need to take place more often, particularly considering most authorities will have completed a GTAA.
- 5.38 Some officers felt that it is helpful that a consistent GTAA methodology has been adopted across the neighbouring authorities. The officer representing St Albans hoped that once the study is completed, it will provide reassurance to neighbours and a basis for future discussions.

6. Survey of Travelling Communities

Interviews with Gypsies and Travellers

- 6.1 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in Luton. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future site provision. As noted in the introduction, “Gypsy and Traveller” refers to:

Persons of nomadic habit of life, whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such (Planning Policy for Traveller Sites, DCLG, March 2012).

- 6.2 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards and encampments in the study area. This identified 1 public site on which to conduct interviews, no private sites with permanent planning permission, no unauthorised sites, and 2 small Travelling Showpeople yards. In addition Gypsy and Traveller households were identified living on the Stopsley Mobile Home Park adjacent to the public site, and 2 family groups living on unauthorised encampments across Luton. The table below identifies the sites and yards that ORS staff visited during the course of the fieldwork.

Figure 9
Sites and Yards Visited in Luton

Public Sites
St Thomas’s Road
Private Sites
None
Unauthorised Sites
None
Showpeople Yards
14 Wigmore Lane
77 Wigmore Lane
Other
Stopsley Mobile Home Park

- 6.3 ORS sought to undertake a full demographic study of all pitches and plots as part of our approach to undertaking the GTAA as our experience suggests that a sample based approach very often leads to an

under-estimate of current and future needs which can be the subject of challenge at subsequent appeals and examinations. A summary of the findings from each site/yard can be found under the headings below.

- 6.4 Through the site surveys data was collected for households living on 15 of the 20 pitches on the public site at St Thomas's Road giving an interview success rate of accessible pitches of 75%; interviews were also completed with residents on the Travelling Showpeople yard at 14 Wigmore Lane. Interviews were not possible with residents at 77 Wigmore Lane or with the residents on the unauthorised encampments.

Public Site

St Thomas's Road

- 6.5 Staff from ORS visited the St Thomas's Road site in April 2015. The site was established in 1970 and was refurbished in 2005 at a cost of £780,000 which was 75% funded by the Government. The site has planning permission for a combination of 20 single and double pitches which can accommodate 26 caravans on hardstanding's. The site was fully occupied at the time of the study. A total of 15 household interviews were completed and these identified one concealed household, 21 adults and 18 children and teenagers (aged under 18).
- 6.6 All of the households that were interviewed can be seen as long-term residents having lived on the site for between 5 and 40 years, with 12 of the households having lived on the site for over 15 years. The majority stated that they lived on the site through their own choice and that it meets all of their accommodation needs. A small number had some concerns about the site including concerns about the site management; repairs needed to fences and street lighting; repairs needed to some of the dayrooms; and the lack of a play area for children. Most households stated that they do not travel, with the small number who do stating that they only travel occasionally to visit family.

Travelling Showpeople

14 Wigmore Lane

- 6.7 Staff from ORS visited the yard at 14 Wigmore Lane yard in April 2015. The yard has planning permission for 6 plots and all were occupied at the time of the study.
- 6.8 The residents accepted that the plots on the yard were over-crowded and a total of 2 concealed and doubled-up households were identified. The households living on the yard comprised 7 adults and 2 children and teenagers (aged under 18). When asked about their future accommodation needs the owner of the yard stated that the family own land elsewhere in a nearby local authority that they are hoping to get planning permission for to develop a new larger yard.

77 Wigmore Lane

- 6.9 Interviews were not possible with residents living at 77 Wigmore Lane.

Unauthorised Encampments

- 6.10 Whilst it is accepted that there are 2 family groups who regularly live on unauthorised encampments across Luton, they were living elsewhere at the time of the fieldwork. However the stakeholder interviews identified that the two groups of families usually move around Luton on a continual basis and have children who attend a local school in the area. The stakeholder who is in regular contact with both families estimated their need is for approximately 12 caravans.

Traveller Households at Stopsley Mobile Home Park

- 6.11 Staff from ORS visited the Stopsley Mobile Home Park in July 2015 and were able to identify 3 pitches occupied by Gypsies and Travellers. It was possible to conduct interviews with 2 of the 3 families who were living on the site. The interviews identified 5 adults and 3 children, including one concealed household.

Figure 10
Site Visit Summary for Luton

Site	Permitted Pitches	Tolerated Pitches	Unauthorised Pitches	Other Pitches	Interviews Completed	Adults	Children (Under 18)	Concealed Households
Public Sites								
St Thomas's Road	20	-	-	-	15	21	18	1
Private Sites with Permanent Permission								
None	-	-	-	-	-	-	-	-
Private Sites with Temporary Permission								
None	-	-	-	-	-	-	-	-
Tolerated Sites								
None	-	-	-	-	-	-	-	-
Unauthorised Developments								
None	-	-	-	-	-	-	-	-
Unauthorised Encampments								
Various	-	-	6	-	0	-	-	-
Other								
Stopsley Mobile Home Park	-	-	-	2	2	5	3	1
TOTAL	20	0	6	2	17	26	21	2

Travelling Community Characteristics

- 6.12 Ethnicity data was captured from all of the households that were interviewed on the Gypsy and Traveller sites. The majority of households stated that they were English Travellers and the remainder were Irish or Scottish Travellers.
- 6.13 The fieldwork also sought to identify the demographics of Gypsies and Travellers living in Luton. Detailed demographic information was obtained for each interview conducted on the public site and on the Stopsley Mobile Home Park. This showed a mixed range of ages across the sites, though a much larger proportion of the population were females and younger when compared to the overall population of Luton from the 2011 Census.

6.14 The site interviews identified 47 residents living on sites at St Thomas's Road. This was made up of 26 adults and 21 children and teenagers aged under 18. This equates to 55% adults and 45% children and teenagers. Although not a direct comparison, data from the Census for Luton as a whole (the settled community and the Gypsy or Irish Traveller community) and for Gypsies or Irish Travellers within the Borough has been compared to the site population. This shows a significant difference between the site population and that of the Luton population as a whole, and less of a difference between the site population and the Census Gypsy or Irish Traveller population for Luton.

Figure 11
Demographic Comparison in Luton

	Age 0-17	Age 18+
Site Interviews	45%	55%
Census Gypsy or Irish Traveller	41%	59%
Census All Luton	26%	74%

7. Current and Future Pitch Provision

Pitch Provision

- 7.1 This section focuses on the additional pitch provision which is needed by Luton Borough Council currently and to 2030. This includes both current unmet need and need which is likely to arise in the future. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources.
- 7.2 We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 7.3 This section concentrates not only upon the total additional provision which is needed in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.
- 7.4 To identify current and future need, PPTS requires an assessment for current and future pitch needs, but does not provide a suggested methodology for undertaking this calculation. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue for residential pitches is to compare the supply that is available for occupation with the current and future needs of the households. The key factors in each of these elements are set out in the sections below.

Supply

- 7.5 The supply of available pitches is made up of the following:
- » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within the study period (unimplemented sites).
 - » Pitches to be vacated by households moving to bricks and mortar.
 - » Pitches to be vacated by households moving from the study area (out-migration).

Current Need

- 7.6 Total current need is not necessarily the need for additional pitches because it may be able to be addressed by space available in the study area. It is important to address issues of double counting. For example potential in-migrants may already be included on a waiting list, or households on a waiting list may already be living as a concealed household on a permitted site, or on an unauthorised encampment in the area. Total current need is made up of the following:

- » Households on unauthorised sites or encampments for which planning permission is not expected.
- » Concealed households/doubling-up/over-crowding.
- » Households in bricks and mortar wishing to move to sites.
- » Households on waiting lists for public sites.

Future Need

7.7 Total future need is the sum of the following three components. Again it is important to address issues of double counting as, for example, potential in-migrants or concealed households may already be on a waiting list:

- » Households living on sites with temporary planning permissions.
- » New household formation.
- » In-migration.

7.8 In order to determine the overall net pitch need ORS will firstly carry out the calculation as set out below for Gypsies and Travellers, and then separately set out issues relating to the possible need for additional transit provision in the study area. A separate review of need will also be undertaken for Travelling Showpeople.

$$\text{Net Pitch Need} = (\text{Current Need} + \text{Future Need}) - \text{Supply}$$

Current Gypsy and Traveller Site Provision - Supply

7.9 To assess the current Gypsy and Traveller provision it is important to understand the total number of existing pitches and their planning status. Council records indicate that there is 1 authorised public site in Luton, no private sites with permanent or temporary planning permission and no unauthorised sites. There is no public transit provision and 2 small Travelling Showpeople yards. The public site was established in 1970 and was refurbished in 2005 at a cost of £780,000 which was 75% funded by the Government. The site has planning permission for a combination of 20 single and double pitches which can accommodate 26 caravans on hardstanding's.

Figure 12
Total number of authorised sites and yards in Luton as at July 2015

Category	Sites/Yards	Pitches/Plots
Private with permanent planning permission	0	0
Private sites with temporary planning permission	0	0
Public Sites (Council and Registered Providers)	1	20
Public Transit Provision	0	0
Private Transit Provision	0	0
Travelling Showpeople Provision	2	7

7.10 The next stage of the process is to assess how much space is, or will become, available on existing sites in order to determine the supply of available pitches:

- » **Current vacant pitches** – At the time of the site fieldwork there were no vacancies on the public site in Luton. However 2 households informed interviewers that they had been served with eviction notices.
- » **Pitches currently with planning consent due to be developed within the study period** – There are no unimplemented pitches, or pitches currently under development, on public or private sites with planning consent in Luton.
- » **Pitches to be vacated by households moving to bricks and mortar** – Two households on the public site stated that they were seeking to move to bricks and mortar accommodation in the next 5 years.
- » **Pitches to be vacated by people moving from the study area (out-migration)** – One household on the public site stated that they were seeking to move to a public site outside of Luton in the next 5 years.

7.11 This gives a figure for **overall supply of 5 pitches** on the public site during the first 5 years of the study.

Additional Pitch Provision: Current Need

7.12 The next stage of the process is to assess current need and determine how many households are currently seeking pitches in the area.

Current Unauthorised Sites and Encampments

7.13 A problem with many Gypsy and Traveller Accommodation Assessments is that they often count caravans on unauthorised sites and encampments as requiring a pitch in the area when in practice many are simply visiting or passing through, and some may be on sites that are tolerated for planning purposes. In order to remedy this, ORS' approach is to treat need as only those households on unauthorised sites already in the planning system (i.e. sites/pitches for which a planning application has been made or are likely to be made); those otherwise known to the Council as being resident in the area; or those identified through the household survey as requiring pitches.

7.14 The study has identified no unauthorised sites in Luton, and 2 extended family groups living in 12 caravans on roadside encampments across Luton and neighbouring areas. Interviewers sought to interview the residents living on the encampments but were unable to do so during the fieldwork period as the families had moved to a neighbouring local authority. However the stakeholder interviews identified that the families have strong links to Luton and their children attend local schools. The families have said to the stakeholder that transit accommodation is not suitable to meet their needs and that they are looking for permanent pitches in Luton. The encampments that the 2 families live on usually contain approximately 12 caravans and therefore it is recommended that **6 additional pitches** can meet this need.

Concealed Households

- 7.15 The site interviews sought to identify concealed or doubled-up households on authorised sites that need a pitch immediately. A concealed household is one living in a multi-family household in addition to the primary family, such as a young couple living with parents, who need their own separate family accommodation, but are unable to do obtain it because of a lack of space on public or private sites, or a single family member or individual living within an existing family unit in need of separate accommodation. The demographic information collected during the site interviews identified **1 concealed** at the St Thomas's Road site and **1 concealed household** at the Stopsley Mobile Home Park.

Figure 13
Total number of Concealed/Doubled-Up Households in Luton as at July 2015

Site	Pitches
St Thomas's Road	1
Stopsley Mobile Home Park	1
Total	2

Bricks and Mortar

- 7.16 Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. The 2011 UK Census of Population identified a total of just 54 Gypsy or Irish Traveller households in Luton. It is unknown what proportion of these were living on sites and what proportion were living in bricks and mortar as the data from the 2011 Census does not break down accommodation type to this level.
- 7.17 As noted earlier, ORS went to all possible lengths to identify Gypsies and Travellers living in bricks and mortar and worked with stakeholders, Council officers, and on-site interviewees to identify households to interview. This process resulted in 2 contacts to interview who were able to provide details about their households and 4 other relatives who are also currently living in bricks and mortar.
- 7.18 The interviews found that not all of the households currently live in Luton and that there are personal circumstances that may prevent some of them moving to a site in Luton. There was no evidence that the remaining households are in immediate need of a pitch in Luton and that when there is a waiting list for the public site their needs in the short to medium term can be met when a pitch becomes available. As such **there is no component of current need identified** in this study from households currently living in bricks and mortar accommodation.
- 7.19 ORS would also note that in a number of recent studies work has been undertaken with Gypsy and Traveller representatives to identify households in bricks and mortar. For a number of these studies the representatives reported over 100 known households in housing and they encouraged them to come forward to take part in the survey. In the majority of cases the actual number who eventually took part in the surveys ranged from zero to six households per area, and a very small proportion of these wished to move back to sites. However in a recent study for a London Borough a similar approach resulted in the identification of over 30 contacts who were interviewed. Therefore, while there is anecdotal evidence of many Gypsies and Travellers in housing, in most cases households appear to be content to remain there

and when provided with the opportunity by representatives to register an interest in returning to sites, few choose to do so.

Waiting Lists

- 7.20 Whilst there is a public site in Luton there is no formal waiting. The Council are aware of written requests to be considered for vacant pitches at the St Thomas's Road site and are currently in the process of rewriting their policy regarding allocations and the waiting list. Given that there is currently no waiting list it has **not been possible at this time to identify any current need** arising from households that would be on the waiting list. The Council should therefore be aware that when the waiting list is in place there may be some additional need arising from households on the list.

Other Gypsy and Traveller Accommodation

- 7.21 Through the interviews with stakeholders it was identified that a number of Gypsy and Traveller families were residing on the Stopsley Mobile Home Park adjacent to the public site. The mobile home site is open to all, rather than being restricted to Gypsies and Travellers. A total of 3 Gypsy and Traveller households were identified and 2 interviews were completed. They were generally satisfied with their accommodation, given its nature (i.e. mobile homes rather than bricks and mortar housing) and its proximity to the existing Traveller site. These 3 households have been counted as contributing towards future growth but, other than the 1 concealed household, they have not been included as components of need.

Additional Pitch Provision: Future Need

- 7.22 The next stage of the process is to assess future need and determine how many households are likely to be seeking pitches in the area in the future. There are three key components of future need.
- » Households living on sites with temporary planning permissions.
 - » Population and household growth.
 - » Movement to and from sites and migration.

Temporary Planning Permissions

- 7.23 There are currently **no sites** in Luton with temporary planning permission.

Population and Household Growth

- 7.24 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller Accommodation Assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates*. The main conclusions are set out here and the full Technical Note can be found in **Appendix E**.
- 7.25 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in the Caravan Counts.

However, Caravan Count data is unreliable and erratic – so the only proper way to project future population and household growth is through detailed demographic analysis.

- ^{7.26} Research undertaken by ORS has identified that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.50% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- ^{7.27} The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers.
- ^{7.28} However, some local authorities might allow for a higher household growth rate per annum, to provide a ‘margin’ if their populations are relatively youthful. In areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.50% per annum should be used for planning purposes.
- ^{7.29} The (compound) net household formation rate that will be used for this study is based on demographic evidence from the site surveys. The base for this calculation includes all current authorised households, all households identified as current need, including concealed households, as well as households living on unauthorised pitches.
- ^{7.30} The Technical Note supports a national net growth rate for the Gypsy and Traveller population of 1.50% using a population base from the 2011 Census where, nationally, approximately 36% of the Gypsy and Traveller population were aged under 18. The site survey for Gypsies and Travellers in Luton indicates that approximately **45%** of the on-site population are children and teenagers aged under 18. Given that this is higher than the proportion that were used to calculate the national net growth rate ORS consider that it is appropriate to allow for future projected household growth for the Gypsy and Traveller population in Luton to occur at an annual net growth rate of **2.00%**. This generous rate will provide enough new pitches to accommodate all newly-forming households have their future needs met.
- ^{7.31} Based on a new household formation rate of **2.00%** we estimate that a total of **11 additional pitches** will be needed during the study period as a result of new household formation, assuming that each forming household will need a pitch of its own. This has used a base figure of 31 pitches which includes full occupancy of all of the pitches on the public sites, 2 concealed households, 6 pitches for households on the unauthorised encampments, and 3 Gypsy and Traveller households living on the Stopsley Mobile Home Park.

Movement to and from sites and migration activity

- ^{7.32} Assessments should also allow for likely in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is zero net migration of Gypsies and Travellers across the UK, but assessments such as this need to take into account local migration effects on the basis of the best local evidence available.

- 7.33 Unless such evidence indicates otherwise, net migration to the sum of zero will be used for the study – which means that net pitch needs are driven by locally identifiable need rather than speculative modelling assumptions. But where there are known likely in-migrant households they will be included in the needs figures – while stressing the potential for double-counting across more than one local authority area. Likewise, where there is likely to be movement away the study area, the net effects will be taken into consideration when calculating current and future needs.
- 7.34 Nationally there are three main sources of in-migration that could account for additional accommodation need. The first is out-migration from London. However, In ORS's current or recent assessments in London (including Bexley, Camden; Hackney, Haringey, Lambeth, Lewisham and for the London Legacy Development Corporation) all show additional need – and work is being progressed to meet these needs. However there was no evidence identified in the study that migrants from London would choose to relocate to Luton.
- 7.35 The second potential source of in-migration is from local authorities with significant areas of Green Belt. A Ministerial Statement in July 2013 reaffirmed that:
- 'The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development in the Green Belt.'*
- 7.36 This position was reaffirmed in the DCLG consultation on the revised policy for Gypsies and Travellers (September 2014), which suggests placing further restrictions on the development of Traveller sites in the Green Belt:
- 'Subject to the best interests of the child, unmet need and personal circumstances are unlikely to outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.'*
- 7.37 However, this does not remove the requirement for local authorities with Green Belt to assess their needs and provide pitches/plots where this is possible. Where this is not possible Paragraphs 178 and 179 of the NPPF set out that 'Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas'. It is not the place of the Gypsy and Traveller Accommodation Assessment to assume one authority will meet the needs of another; and authorities unable to meet their own needs should work with neighbours to do so. This process is well established in general housing provision.
- 7.38 The final main source of in-migration to the study area is from the closure of unauthorised sites and encampments. There are several well documented cases of large-scale movements of Gypsies and Travellers following enforcement action against unauthorised sites – for example, from Dale Farm in Essex. There is no evidence of the closure of large unauthorised sites around Luton.
- 7.39 If in-migration to a study area is a source of demand for pitches, out-migration is a source of supply. The potential for the supply of some pitches arising from out-migration includes households moving to other areas from private sites with general planning consent for Gypsy or Traveller occupation and selling the

sites to other Gypsy and Travellers or for housing development; and households moving away from private sites with personal planning consents, so that the sites revert to their previous status.

^{7.40} Evidence drawn from stakeholder and site interviews in Luton has been carefully considered and has **identified that 1 household is seeking to move away from the public site in Luton and that there is no evidence of any in-migration**, other than natural pitch turnover. Beyond this, rather than assess in-migrant households seeking to develop new sites in the area, it is recommended that each case is assessed as a desire to live in the area and that site criteria rules are followed for each new site. It is therefore important for the Council to continue to follow its existing criteria-based planning policies for any new potential sites which do arise.

Overall Need for Luton

7.41 Each element of the calculation for the need has been examined and the next stage of the process is to balance need against supply to provide an overall need for Luton. As set out at the start of this section the following calculation is carried out to derive the overall net pitch need.

$$\text{Net Pitch Need} = (\text{Current Need} + \text{Future Need}) - \text{Supply}$$

7.42 The estimated additional provision that is needed over the period to 2030 will be **14 additional pitches** to address the needs of all identifiable Gypsy and Traveller households. This includes the existing households on unauthorised encampments, concealed households and the expected growth in household numbers due to new household formation.

Figure 14
Additional Pitches Needed in Luton from 2015-2030

Source of Need/Supply	Current and Future Need	Supply	Net Pitch Need
Supply of Pitches			
Additional supply from vacant pitches	-	2	-
Movement to bricks and mortar	-	2	-
Out-migration	-	1	-
Additional supply from unimplemented sites	-	0	-
Additional supply new sites	-	0	-
Total Supply	-	5	-
Current Need			
Unauthorised developments or encampments	6	-	-
Concealed households	2	-	-
Net movement from bricks and mortar	0	-	-
Total Current Need	8	-	-
Future Need			
Pitches with temporary planning permission	0	-	-
In-migration	0	-	-
New household formation (2.00%)	11	-	-
Total Future Needs	11	-	-
Total	19	5	14

Split to 2030 in 5 year Time Periods

7.43 In terms of providing results by 5 year time periods, ORS has assumed that the needs of all unauthorised pitches and concealed households are addressed in the first 5 years. In addition new household formation is apportioned over time based on a net compound growth rate of 2.00%. The figure for 2015-20 is made up of 6 from unauthorised pitches, 2 concealed households, 3 from new household formation, less the

supply of 5 pitches at the St Thomas's Road site. The remainder of the net new household formation is split between years 6-10 and 11-15 based on a net compound growth rate of 2.00%.

Figure 15
Additional Pitch Provision Luton in 5 Year Periods (Financial Year 01/04-31/03)

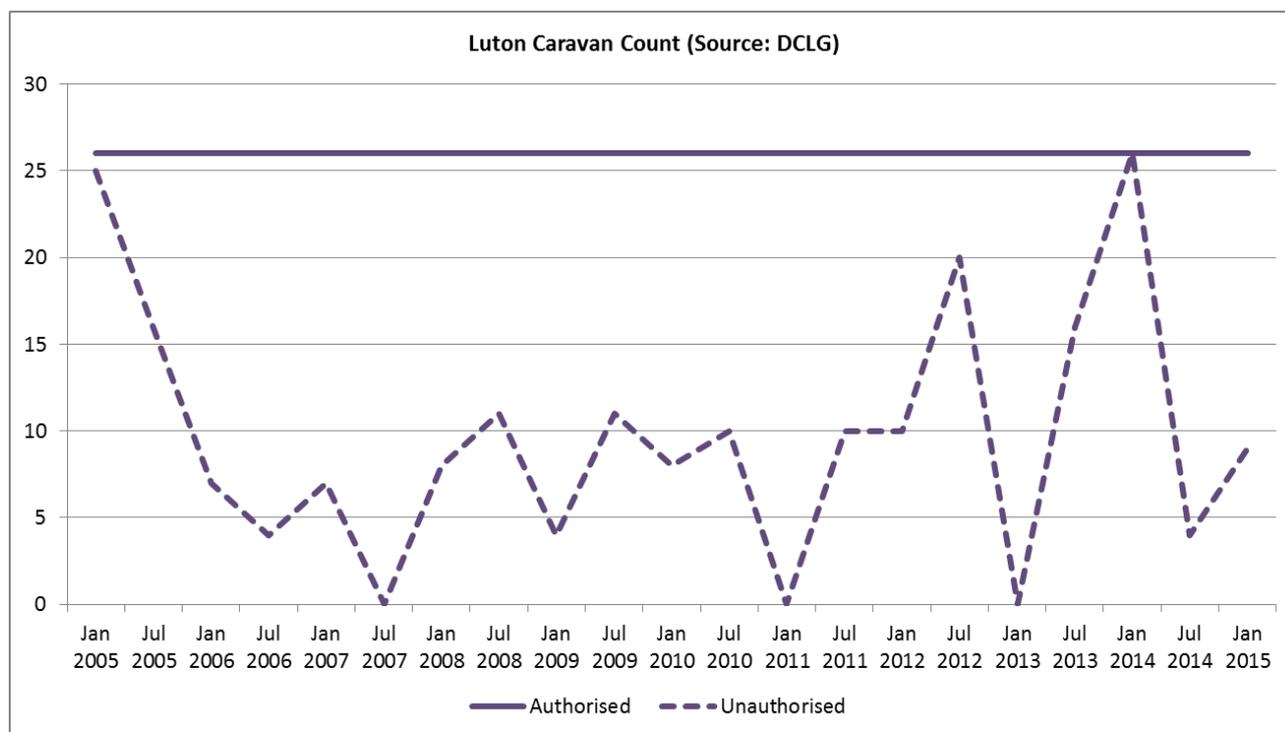
	2015-2020	2020-2025	2025-2030	Total
Luton	6	4	4	14

Transit/Emergency Stopping Site Provision

- ^{7.44} Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through. A transit site typically has a restriction on the length of stay of around 13 weeks and has a range of facilities such as water supply, electricity and amenity blocks. An alternative to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which a Traveller can stay on it, but has much more limited facilities with typically only a source of water and chemical toilets provided. Some authorities also operate an accepted encampment policy where households are provided with access to lighting, drinking water, refuse collection and hiring of portable toilets at a cost to the Travellers.
- ^{7.45} The Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62A of the Act allows the Police to direct trespassers to remove themselves, their vehicles and their property from any land where a suitable pitch on a relevant caravan site is available within the same Local Authority area (or within the county in two-tier Local Authority areas). A suitable pitch on a relevant caravan site is one which is situated in the same Local Authority area as the land on which the trespass has occurred, and which is managed by a Local Authority, a Registered Provider or other person or body as specified by order by the Secretary of State. Case law has confirmed that a suitable pitch must be somewhere where the household can occupy their caravan. Bricks and mortar housing is not a suitable alternative to a pitch.
- ^{7.46} Therefore, a transit site both provides a place for households in transit to an area and also a mechanism for greater enforcement action against inappropriate unauthorised encampments.
- ^{7.47} There are no public transit sites in Luton and as it is a unitary authority it is not able to make use of transit sites in neighbouring areas. The previous GTAA recommended that the Council provide a public transit site of 10 pitches within the Luton Borough boundary, and that this would give the police stronger powers to move on unauthorised encampments, as well as providing Travellers with facilities, and potentially alleviating some of the tensions with the settled community caused by Travellers occupying and possibly damaging public parks and other land.
- ^{7.48} Most stakeholders interviewed during this study gave examples of unauthorised encampments during the summer months made up of people visiting friends and family or attending specific events. They also supported the provision of a site or area which serves the more transient population, but most felt that it was very unlikely that a suitable, available and affordable site exists in Luton given the land constraints in the area.

- 7.49 In addition the biannual Caravan Count has also recorded peaks in the numbers of unauthorised and un-tolerated caravans in the Borough during the counts since 2008, both during the summer and winter months.

Figure 16
DCLG Caravan Count Data for Luton



- 7.50 Given the levels of unauthorised encampments over the summer and winter months that have been identified in Luton it is recommended that there is **still a need for the Council to deliver new public transit provision for 10 pitches.**

Need for Travelling Showpeople Plots

- 7.51 As noted earlier there are 2 small Showmen's yards in Luton which are used as a permanent base for the families when they are not away working. During the fieldwork it was only possible to speak with residents on the larger of the 2 yards.
- 7.52 Whilst the demographic data collected during the site visits could be used to complete a statistical analysis of their needs, it is felt due to the small numbers involved, that this study should instead follow the guidance in Paragraph 6 (a) of PPTS which states that *In assembling the evidence base necessary to support their planning approach, local planning authorities should...pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing Travellers' accommodation needs with Travellers themselves, their representative bodies and local support groups).*
- 7.53 The outcomes of the site interviews identified that the existing yard is privately owned and contains 3 plots for members of an extended family group. The residents are aware that their existing yard is over-crowded,

and that some of their children currently need their own accommodation. They stated that they own land in a nearby local authority and are exploring whether they can get planning permission to develop a proportion of this land to provide the family with a new yard to meet their needs. Whilst it was not possible to interview residents on the other yard the intelligence obtained during the course of this study suggests that this is used predominantly for the storage of equipment. Therefore **it is not recommended that the Council should provide for any additional Traveling Showpeople plots** at this time, but that the situation regarding the potential development of a new yard in an adjacent local authority is closely monitored.

8. Conclusions

Gypsy and Traveller Future Pitch Provision

- 8.1 Based upon the evidence presented in this study the estimated additional pitch provision needed for Gypsies and Travellers in Luton to 2030 is for **14 pitches**. These figures should be seen as the projected amount of provision which is necessary to meet the statutory obligations towards identifiable needs of the population arising in the area. The table below shows the provision needed in 5 year time periods to 2030. This is based upon addressing the households on unauthorised encampments and concealed households in the first 5 years and then projecting forward household growth based on a net compound growth rate of 2.00%. The figure for 2015-20 is made up of 6 from unauthorised encampments, 2 concealed household, 3 from new household formation, less the supply of 5 pitches at the public site. The remainder of the net new household formation is split between years 6-10 and 11-15 based on a net compound growth rate of 2.00%.

Figure 17

Additional Pitch Provision in Luton in 5 Year Periods (Financial Year 01/04-31/03)

	2015-2020	2020-2025	2025-2030	Total
Luton	6	4	4	14

Transit Sites

- 8.2 Given the levels of unauthorised encampments over the summer months that have been identified in Luton it is recommended that there is **still a need for the Council to deliver new public transit provision for 10 pitches**.

Travelling Showpeople Needs

- 8.3 The outcomes of the site interviews identified that the residents at 14 Wigmore Lane are aware that the existing yard is becoming over-crowded. Given that the residents stated that they own land in a nearby local authority and are exploring whether they can get planning permission to develop a proportion of this land to provide the family with a new yard to meet their needs, **it is not recommended that the Council should provide for any additional Traveling Showpeople plots at this time**, but that the situation regarding the potential development of a new yard in an adjacent local authority is closely monitored.

Appendix A: Glossary of Terms

Amenity block/shed	A building where basic plumbing amenities (bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Chalet	A single storey residential unit which can be dismantled. Sometimes referred to as mobile homes.
Concealed household	Households, living within other households, who are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Household formation	The process where individuals form separate households. This is normally through adult children setting up their own household.
In-migration	Movement into or come to live in a region or community
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order to settle in another.
Personal planning permission	A private site where the planning permission specifies who can occupy the site and doesn't allow transfer of ownership.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.
Private site	An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied

	and rented pitches.
Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local authority or a Registered Housing Provider.
Temporary planning permission	A private site with planning permission for a fixed period of time.
Tolerated site/yard	Long-term tolerated sites or yards where enforcement action is not expedient and a certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers of applications to live on a site.
Yard	A name often used by Travelling Showpeople to refer to a site.

Appendix B: Sites and Yards in Luton (July 2015)

Site/Yard	Authorised Pitches/Plots	Unauthorised Pitches/Plots
Public Sites		
St Thomas's Road	20	-
Private Sites with Permanent Permission		
None	-	-
Private Sites with Temporary Permission		
None	-	-
Tolerated Sites – Long-term without Planning Permission		
None	-	-
Unauthorised Encampments		
Various	-	6
TOTAL PITCHES	20	6
Transit Sites		
None	-	-
Private Travelling Showpeople Yards		
14 Wigmore Lane	6	-
77 Wigmore Lane	1	-

Appendix C: Site Record Form

Gypsy & Traveller Accommodation Assessment – Site/Pitch Record															
General Information															
Name of Local Authority						Luton									
Date of Site Visit															
Time of Site Visit															
Name of Interviewer(s)															
Address and Pitch Number															
Type of Site						Council									
Name of Family															
Ethnicity of Family						Romany Gypsy / Irish Traveller / Scots Gypsy or Traveller / Show Person / New Traveller / English Traveller / Welsh Gypsy / Non Traveller (specify)									
How long have you live here?															
Who else lives here?															
Family Demographics															
Person 1		Person 2		Person 3		Person 4		Person 5		Person 6		Person 7		Person 8	
Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age
How many caravans of the pitch?															
How many separate families or unmarried adults live on this pitch? Is there enough room on this pitch for everyone? If not, how many need a home of their own?															
How many of your children or grandchildren will need a home of their own in the next 5-10 years? If they live here now, will they want to stay on this site if they can? If not, where would they wish to move? (e.g. another site in the areas/site outside the areas/other type of accommodation including bricks & mortar)															
How many people living here are on the waiting list for a pitch? How long have they been on the waiting list for?															

Do you live here out of your own choice or because there was no other option?	
Do you plan to move out in the next 5-10 years? If so why?	
Where would you move to? Why?	
If you or your children had to move into housing, what type of home would be suitable? (Flat/house/maisonette) What are the things that would make your accommodation more suitable e.g. garden/outside space, family members nearby etc.	
Contacts for Bricks & Mortar Interviews	<i>Details of any friends or family living in bricks and mortar who want to move to a site</i>
Travelling <i>Whether households travel, frequency and reasons for travelling. Length of travelling period and whether it is head of household travelling or whole family who travel. If not travelling, the reasons why not.</i>	
Any additional information <i>Recent accommodation history, extent of lacking or sharing of basic amenities, any special educational needs/ requirements, access to local services etc.</i>	

Site/Pitch Plan	<i>Sketch of Site/Pitch – any concerns?</i>

Appendix D: Bricks and Mortar Advert



Gypsy, Traveller & Travelling Showpeople Accommodation Assessments

Opinion Research Services (ORS) is an independent research company who carry out Gypsy, Traveller and Travelling Showpeople Accommodation Assessments across the country.

These assessments must be carried out by every council to inform them how many new pitches and plots will need to be provided in the future.

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

Basingstoke and Deane, Bedford, Hinckley & Bosworth, Luton, North Somerset and the Royal Borough of Windsor and Maidenhead.

Your views are very important to us.

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

Appendix E: Technical Note on Household Formation and Growth Rates

Technical Note

Gypsy and Traveller Household Formation and Growth Rates

March 31st 2015

Opinion Research Services
Spin-out company of Swansea University



As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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Contents

Abstract and conclusions

Introduction

Compound growth

Caravan counts

Modelling population growth

Household growth

Household dissolution rates.....

Summary and conclusions.....

Household Growth Rates

Abstract and conclusions

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

Introduction

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

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

The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count. [In footnote 6, page 25]

10. The guidance emphasises that local information and trends should always be taken into account – because the gross rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a gross growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting net household growth rate that matters for planning purposes in assessing future accommodation needs.
11. The current guidance also recognises that assessments should use local evidence for net future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

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

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

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

Compound growth

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

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

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

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

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

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

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

Caravan counts

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

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

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

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

19. The annual rates of growth in the number of caravans varies from slightly over 1% to just over 5% per annum, but there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). It is also possible, of course, that the growth of caravan numbers reflects the provision on some sites of rental accommodation for non-Gypsy and Traveller migrant workers.
20. In any case, there is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates.

Modelling population growth

Introduction

21. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together

they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

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

Population profile

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

Table 4
Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9
Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7

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

Birth and fertility rates

25. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)
26. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. Unfortunately, we know of no reliable national data on the fertility rates of the UK Gypsy and Traveller community so the modelling has to be inferential in using plausible (but never perfect) comparative data. One source is Hungary, where considerable detailed analysis has shown that its Roma population has a TFR of about 3.
- (For more information see: <http://www.romaniworld.com/cessmod01.htm> and <http://www.tarki.hu/adatbank-h/kutjel/pdf/a779.pdf>).
27. While it would be unsatisfactory to rely only on the Hungarian data (however well researched), it is significant that ORS's own survey data is consistent with a TFR of about 3. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). It is reasonable, then, to assume an average of three children per woman during her lifetime. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

28. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the net population growth cannot conceivably achieve 2% per annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total

population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

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

Modelling outputs

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

Household growth

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

Table 5
Age of Head of Household (Source: UK Census of Population 2011)

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

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

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

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

38. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).
39. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. It is also well documented that adult Gypsy and Traveller males travel far more frequently than females for work purposes. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2014) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.
40. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While

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

Household dissolution rates

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

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

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

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

Summary and conclusions

43. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.
44. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.
45. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above

2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.

46. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.