

## **WEST MIDLANDS: INTERIM REGIONAL STATEMENT ON GYPSY & TRAVELLER POLICY**

### **Purpose of the Interim Statement**

1. The West Midlands Regional Assembly recognises that Gypsy & Traveller accommodation needs are serious and urgent in the Region and is committed to increasing site provision across the Region. This is in recognition of the shortage of culturally-appropriate accommodation for Gypsies & Travellers and the adverse consequences this has for harmony and cohesion between the Travelling and settled communities. Shortage of site accommodation has also been seen as an important element in the social exclusion of Gypsies & Travellers, contributing to poor health and educational attainment.
  
2. The West Midlands Regional Spatial Strategy (RSS) was published in June 2004. At that time the Secretary of State supported the principles but suggested several issues which needed to be developed further, one of which was a review of Gypsy and Traveller Policy. The existing RSS policy CF5, states that ‘development plans should ensure that adequate provision is made for suitable sites to accommodate gypsies and travellers. Such provision should reflect the order of demand in the area as indicated by the trends shown by the ODPM annual count and any additional information’ (p.40)
  
3. In accordance with ODPM Circular 01/2006 this existing policy will be reviewed within the RSS Revision process, to allow the West Midlands Regional Planning Body (RPB) to ‘identify the number of pitches required (but not their location) for each local planning authority in the light of the GTAAs and a strategic view of needs across the Region’ (p.8). The resulting new policies on site provision, down to district level, will draw upon the outcomes from the Gypsy and Traveller Accommodation Assessments (GTAAs) being conducted in 2007 by local authorities.
  
4. However, local authorities must be mindful of the fact that transitional action is required now to address needs on the basis of this Interim Regional Statement and the emerging GTAAs. Local authorities should not wait for Phase 3 of the RSS to allocate pitches. The outline timetable for Phase Three is as follows:
  - Draft Project Plan – Spring 2007
  - Options Stage – Summer 2008
  - Development of preferred Option – Winter 2008
  - Submission to the Secretary of State – Summer 2009
  
5. Because of the urgency and priority of the issue, and the requirements of ODPM Circular 01/2006 (see below), this Interim Regional Statement on Gypsy & Traveller Policy has been produced to cover the period until the completion of the RSS Revision for this policy area, to assist Local Planning Authorities in developing local plans for Gypsy & Traveller site provision. A consultation workshop was held on 22 February 2007 with 38 participants. Comments from this consultation have been taken into account in the Interim Regional Statement.

## National Policy

6. Site provision has a high priority in national policy. ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites* sets out the new policy and legislative framework for planning Gypsy & Traveller site provision. The Housing Act 2004 requires local authorities to assess the need for Gypsy & Traveller accommodation in their areas. There is currently no completed GTAA information on which to draw in the West Midlands (see Annex 1 for progress details), and the Interim Statement follows transitional arrangements described in paragraphs 41 to 46 of Circular 01/2006.

7. Travelling Showpeople are not included in the Gypsy & Traveller groups covered by Circular 01/2006. A Consultation on revised planning guidance for Travelling Showpeople was launched on 29 January 2007, seeking to update current guidance given by Circular 22/91. GTAA's are to include the needs of Travelling Showpeople, and these will be incorporated into revised Regional Spatial Strategies and Local Development Plans in the same way as for Gypsies & Travellers. The RSS Revision on Gypsy & Traveller site provision will include consideration of Travelling Showpeople. A Supplement to this Interim Statement will draw together information on current site provision for Travelling Showpeople and Circus Families through a e-mail survey of local authorities. This survey will also seek indications/evidence of current accommodation needs to supplement information provided by the Showmen's Guild on regional needs.

8. There have been a number of recent reports which relate to Gypsy & Traveller accommodation issues, and which focus on good practice in the provision of services for Gypsies & Travellers<sup>1</sup>. Together these reports emphasise the urgency and centrality of the accommodation issue and spell out some of the consequences of further delay for Gypsy & Traveller health, education and well-being. They do not have further direct implications for the Interim Statement beyond emphasising the importance of increasing site provision as quickly as possible in a culturally sensitive manner and linking with other services for Gypsies & Travellers.

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<sup>1</sup> Commission for Racial Equality (2006) *Common Ground : Equality, good race relations and sites for Gypsies and Irish Travellers*, CRE

Local Government Association (2006) *Report of the LGA Gypsy and Traveller Task Group*, LGA  
Communities and Local Government (2006) *Moving On : Reconnecting Frequent Movers*, CLG  
Communities Scotland: Regulation and Inspection (2006) *Services for Gypsies/Travellers: a follow-up study 2005/2006*

[http://www.communitiesscotland.gov.uk/stellent/groups/public/documents/webpages/cs\\_013730.pdf](http://www.communitiesscotland.gov.uk/stellent/groups/public/documents/webpages/cs_013730.pdf)

Action For Irish Youth (2004) *Room to Roam: England's Irish Travellers*, AGIY, [http://www.the-sra.org.uk/documents/pdfs/sra\\_evening\\_seminar/power\\_summary.pdf](http://www.the-sra.org.uk/documents/pdfs/sra_evening_seminar/power_summary.pdf)

Van Cleemput, P and Parry G (2001) 'Health Status of Gypsies and Travellers' *Journal of Public Health Medicine* Vol 23 (2); 29-134

Go to [www.standards.dfes.gov.uk](http://www.standards.dfes.gov.uk) for a range of reports on education services and standards in relation to Gypsies and Travellers

## Objectives

9. The overall aim of Government policy is to create and support sustainable, respectful and inclusive communities where Gypsies & Travellers have fair access to accommodation and other services. Through sustainable site provision, the aim is to reduce tensions between Gypsies & Travellers and the settled community which result from unauthorised encampments and unauthorised development of sites without planning consent. The policy is to recognise, protect and facilitate the traditional travelling way of life of Gypsies & Travellers, whilst respecting the interests of the settled community. The direct aim is to increase the number of authorised Gypsy & Traveller sites in appropriate locations in order to address under-provision over the next 3-5 years from 2006.

10. These aims underline the importance of identifying an assessment of regional pitch requirements in the West Midlands to give direction to LPAs in their emerging Local Development Frameworks.

## Evidence Base: Sources of Information

11. Information is not yet available from GTAAAs and is unlikely to be available on any comprehensive basis across the Region until the end of 2007 at the earliest. In this context the Interim Statement must be based on secondary data.

12. In 2005, the Centre for Urban and Regional Studies, University of Birmingham carried out research on Gypsy & Traveller needs as part of the Shared Evidence base for the West Midlands Regional Housing and Spatial Strategies<sup>2</sup>. This drew on information from the twice-yearly Gypsy and Traveller Caravan Counts published by Communities and Local Government, and on a brief questionnaire survey addressed to local authorities in the Region. The Count information included in the report related to the period up to 2004. This report is referred to as the CURS research below.

13. The Caravan Count is the only consistent national time-series information available on Gypsies & Travellers, albeit only those living in caravans. It is widely believed to under-state the number of Gypsy & Traveller caravans because caravans on unauthorised sites, and to a lesser extent on private sites, may be omitted in areas where local authorities do not keep good records or pro-actively search for sites on Count day. Despite these shortcomings, the Counts provide the main source of information on which to draw prior to the completion of GTAAAs. Any analysis based on the Counts is likely to under- rather than over-state need and requirements. Once GTAAAs are available the information can be considered alongside the Interim Statement prior to the RSS revision being confirmed by the Secretary of State.

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<sup>2</sup> Pat Niner (2005) *Gypsies and Travellers*, CURS, University of Birmingham, <http://www.curs.bham.ac.uk/pdfs/GT%20report%20FINAL.pdf>

## Current Provision in the West Midlands

14. The Counts in January and July 2006 show 1,580 and 1,526 caravans across the West Midlands respectively. Of these, 80% are on authorised sites. Table 1 provides the detail for types of sites. The proportion of types of sites is very similar in the Region to the English average.

Type of site	January		July	
	Number	%	Number	%
Socially rented (LA or RSL)	718	45	706	46
Private authorised	580	37	521	34
Unauthorised development <sup>(1)</sup>	183	12	188	12
Unauthorised encampment <sup>(2)</sup>	99	6	112	7
Total	1,580	100	1,526	100

<sup>(1)</sup> Caravans on unauthorised sites on Gypsies' own land

<sup>(2)</sup> Caravans on unauthorised sites not on Gypsies' own land

15. The charts in Annex 2 illustrate trends since 1994 and show that overall caravan numbers have been broadly stable since around 1998, at a lower level than at the start of the period in 1994. Caravans on socially rented sites have again been broadly stable since the late 1990s – albeit with some fluctuations – in this case having risen initially. Stable caravan numbers reflect lack of site development by local authorities since the late 1990s which may have contributed to – but which does not wholly account for – the presence of caravans on unauthorised sites in the Region. Caravans on private sites have shown an overall slight growth since 1994 until a sharp (and unexplained<sup>3</sup>) drop in July 2006. Over the period, the number of caravans on unauthorised sites has fallen. Unauthorised sites include both unauthorised development sites (those set up on Gypsy-owned land without planning permission) and unauthorised encampments (on land not owned by Gypsies & Travellers). In the Region the number of caravans on unauthorised encampments has fallen faster than the number of caravans on unauthorised developments has increased.

16. There are currently 32 socially rented sites in the Region, providing 571 pitches with a caravan capacity of 887 (July 2006). The number of caravans counted suggests that sites were at just under 80% capacity, but this is more likely to be a reflection of some families on double pitches having a single caravan only than of significant numbers of vacant pitches. In some instances, 'chalets' or mobile homes on sites may not have been counted as 'caravans', thus understating the number of living units on the sites. The great majority of local authority sites are recorded as providing residential rather than transit accommodation. Of the total of 571 pitches just fifteen transit pitches were identified in July 2006, located on sites in Stoke on Trent and Bromsgrove.

<sup>3</sup> A decrease in numbers between January and July 2006 on private sites was apparent in several authorities across the Region, but the largest decrease (40 caravans) was in South Staffordshire where the July 2006 figures was unusually low.

17. The distribution of Gypsy & Traveller caravans on authorised sites across the Region is not even but concentrated into relatively few authorities. Eight authorities recorded more than 60 caravans in January 2006:

Wychavon	240 (social and private roughly similar)
North Shropshire	99 (private outnumber social)
South Staffordshire	78 (exclusively private)
Herefordshire	73 (predominantly social)
Stoke on Trent	70 (exclusively social)
Telford & Wrekin	69 (exclusively social)
Stafford	67 (predominantly private)
Rugby	61 (exclusively private)

Together these eight authorities account for 58% of caravans on authorised sites across the Region. In contrast, six authorities (Bridgnorth, Warwick, Redditch, Staffordshire Moorlands, Lichfield and Tamworth) have no authorised provision. The maps in Annex 2 which are based on the January 2006<sup>4</sup> Count figures show this pattern.

18. Unauthorised sites can be seen as indications of need for authorised provision and also as a form of homelessness specific to Gypsies & Travellers. There were 183 caravans on unauthorised developments in January 2006, located in fourteen local authorities. Those with ten or more caravans recorded were:

Wychavon	50
Rugby	32
Stratford-on-Avon	28
South Staffordshire	11
Stafford	10

All of these authorities except Stratford-on-Avon appear in the list above of authorities with relatively high levels of authorised provision.

19. The maps illustrate the relatively low level of unauthorised encampment across the Region. No caravans were recorded on unauthorised encampments in 25 of the Region's 34 local housing authorities in January 2006 (or in 23 authorities in July when seasonal travelling might have been expected to increase incidence of encampments). The only authority recording more than ten caravans in January (and July) 2006 was Herefordshire (62 caravans representing 63% of the Region's 99 caravans on unauthorised sites on land not owned by Gypsies). In this instance, all were recorded as 'tolerated' and are attributable to a number of 'sites' occupied by New Travellers in Herefordshire; these are relatively stable and present issues which are different from those of 'normal' roadside encampments.

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<sup>4</sup> The January figures represent a better base for estimating a constant population level than the July ones which may be affected by seasonal travelling.

20. In summary, analysis of current provision, as evidenced by the Counts, reveals relatively stable numbers of Gypsy & Traveller caravans across the Region since around 2000. This implies that a significant element of population increase among the Gypsy & Traveller communities has not been accommodated in caravans in the Region; new 'households' may have moved to housing and/or to areas outside the Region. Around a fifth of caravans are on unauthorised sites, predominantly unauthorised development of sites on Gypsies' own land or tolerated encampments on other land. The distribution of provision/caravans is uneven and concentrated so that more than half of caravans on authorised sites are recorded in eight authorities. Unauthorised development is still more uneven with just five authorities having ten or more caravans and together accounting for over 70% of such caravans across the Region.

21. The Caravan Counts provide no information on Gypsy & Traveller families or demographic or ethnic characteristics. The CURS research in 2005 drew attention to a number of features found in national research and needs assessments in other parts of the country. These include:

- Family size among Gypsies & Travellers is larger on average than among the settled community. There are indications that Gypsies & Travellers marry young, and generations are relatively short. Household formation rates are likely to be higher than in the population as a whole.
- Especially among Irish Travellers the extended family is important<sup>5</sup>. Some extended families ideally want to live together on sites, implying a trend towards site extension over time.
- Gypsy & Traveller communities are complex, with ethnic and family distinctions not readily perceived or understood by outsiders. All the main Gypsy & Traveller groups are found in the West Midlands (English (Romany) Gypsies, Irish Travellers and New Travellers, plus Scottish Gypsy Travellers and Welsh Gypsies). Tensions between some Gypsy & Traveller groups and families mean that seeking to mix them indiscriminately on sites will not be sustainable.
- Gypsy & Traveller lifestyles are changing and adapting. For example, it appears that fewer Gypsies & Travellers pursue a fully nomadic lifestyle now and that there are trends toward greater 'settlement' not necessarily linked with movement into bricks and mortar. Again, there appears to be some movement into employment (rather than self-employment) especially among women.

### **Future Additional Pitch Requirements**

22. In the absence of completed GTAAs, some other means of assessing immediate pitch requirements to be met over the next five years or so is needed. There is no comprehensive information from local authorities or other sources.

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<sup>5</sup> See for example, Colm Power (2004) *Room to Roam*, AGIY

23. The CURS research in 2005 made tentative estimates of need for the period 2005 to 2010 across the Region by using information from the Counts, assumptions on need from families on unauthorised sites and assumptions on the scale of need likely to be generated from current shortfalls, household formation and waiting lists on current authorised sites. Requirements for long-stay residential places were estimated to be 655 to 730 pitches. Transit pitch requirements were estimated at 60 to 90 pitches across the Region but, with vacancy allowances to facilitate mobility, this could amount to a total requirement up to four times this level.

### **Residential Pitch Requirements**

24. The 2005 CURS assumptions on residential pitch requirements generated from existing sites were based on an early, 2004, ‘out of region’ GTAA in South & West Hertfordshire. Comparing the findings of that study with those from later GTAA’s carried out elsewhere suggests that the requirements may be too high, which has direct implications for the West Midlands. For this reason, new calculations have been made using a method (or ‘tool’) developed by a consortium of researchers<sup>6</sup> working on behalf of Communities and Local Government in partnership with the Government Office for the East of England and the Regional Assemblies for the East, South East and South West<sup>7</sup>. This method concentrates on assessing **net additional requirements for residential pitches** over the first five years of a plan period. The tool uses benchmarked GTAA information where available, but proposes the use of a ‘formula’ based on figures for caravans on unauthorised developments and authorised sites from the Caravan Counts where there is currently no GTAA information or the GTAA is found to be less robust. Basically the formula is:

**Net additional residential pitch requirement for an area equals  
the number of unauthorised development pitches in the area  
plus 40% of the number of authorised pitches in the area**

More details are given in Annex 3.

25. Inevitably a formula-based approach is crude, but it is preferable to looking only at unauthorised sites as an interim indication of need. Implicitly, because the formula is based on robust and comprehensive GTAA findings, it takes account of current shortage and concealed households, future (five year) household growth, net movement between sites and houses, net movement into and out of the study area, an allowance for need for residential pitches from unauthorised encampment and supply factors. Because it is based on Caravan Count information, the formula will work less well in areas where unusually large proportions of the Gypsy & Traveller population live in houses since it is likely to under-state need to move from houses to sites on the part of existing or newly forming households.

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<sup>6</sup> From the Centre for Urban and Regional Studies, University of Birmingham; Salford Housing & Urban Studies Unit, University of Salford; and the Centre for Regional Economic and Social Research, Sheffield Hallam University.

<sup>7</sup> Communities and Local Government (2007) *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies*, available at:  
[http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings\\_id1508209.pdf](http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings_id1508209.pdf)

26. The formula is applied in Annex 4 to the West Midlands using Count information from January 2006. The areas are those for which GTAA's are planned or in progress. Two small amendments have been made to the published model to take account of circumstances in the West Midlands:

- The method involves converting 'caravans' as recorded in the Count to 'pitches' to accommodate family units. The published model assumes an average of 1.7 caravans per pitch. A comparison of social rented pitch and caravan numbers in the West Midlands suggests a lower average number of caravans per pitch, and an assumed average of 1.5 caravans has been used here.
- Caravans on tolerated unauthorised encampments in Herefordshire have been treated in the same way as caravans on unauthorised developments in the published model (that is, they are counted 100% towards pitch requirements). This is because of the particular local circumstances and the nature of the 'sites' involved.

27. The requirements by GTAA area and for the Region, rounded to the nearest five pitches, are shown in Table 2.

<b>Table 2: Summary of Residential Pitch Requirements: West Midlands Region and Sub-regions: 2006 to 2011</b>	
<b>Area</b>	<b>Estimated requirement</b>
Shropshire & Herefordshire (and Powys) GTAA (Herefordshire, Bridgnorth, North Shropshire, Oswestry, Shrewsbury & Atcham, South Shropshire, Telford & Wrekin)	120
South Housing Market Area GTAA (Stratford-on-Avon, Warwick, Bromsgrove, Malvern Hills, Redditch, Worcester, Wychavon, Wyre Forest)	170
North Staffordshire GTAA (North Housing Market Area) (East Staffordshire, Newcastle under Lyme, Stafford, Staffordshire Moorlands, Stoke on Trent)	55
Central Housing Market Area (part)GTAA (Cannock Chase, Lichfield, South Staffordshire, Tamworth, North Warwickshire, Nuneaton & Bedworth, Rugby)	100
Black Country GTAA (Dudley, Sandwell, Walsall, Wolverhampton)	40
Birmingham, Coventry and Solihull GTAA	20
<b>West Midlands Region</b>	<b>510</b>

NB: The Regional total does not equal the sum of the areas because of rounding

28. Thus the regional residential pitch requirement, over the next five years, is around **500 pitches**. About a third of this requirement stems from unauthorised development (and tolerated unauthorised encampments in Herefordshire), the remainder represents current shortfall and family growth on current authorised provision, including an implicit element for migration and any net movement from bricks and mortar. Geographically, requirements are highest in the west and south of the Region. Requirements are apparently relatively low in the West Midlands conurbation; it is

possible that the formula under-states requirements there because of higher proportions of Gypsies & Travellers who live in housing as, for example, at Low Hill in Wolverhampton.

29. Within the North Housing Market Area a new site will provide 8 permanent pitches for 12 caravans which will go some way to addressing the assessed need for 55 additional pitches over the next five years. There is also room for further provision on this site.

30. A fundamental characteristic of the formula is that it estimates ‘need where it arises’ rather than ‘need where it should be met’. There is thus a tendency to reinforce existing settlement patterns. Considering ‘need where it should be met’ within a strategic context is a task for the RSS Revision when fuller information is available from GTAAs.

31. The published<sup>8</sup> approach and formula provide an estimate of residential pitch requirements for 2006-2011 only. Table 3 shows estimates of possible further requirements generated by continuing demographic growth for five-year periods to 2026 at regional level. These calculations are made on the following assumptions:

- The West Midlands Gypsy & Traveller population is mixed, including Gypsies, Irish Travellers, New Travellers and others. It is reasonable, therefore, to apply household growth rates developed elsewhere which reflect general Gypsy & Traveller demographic tendencies to have larger families and more rapid household growth than the settled population as a whole. A compound growth rate of 3% per annum is suggested in the Communities and Local Government<sup>9</sup> report referred to above. This is used for years 2011 to 2016.
- It is reasonable to assume that Gypsy & Traveller demographic characteristics will, over time, move nearer to whole population averages. Table 3 therefore applies a lower rate of 2.5% a year in 2016 to 2021 and 2% a year in 2021 to 2026.
- All growth rates are calculated on a compound basis so that each period’s growth is added to the initial base in order to calculate the following period’s increase. There is an implicit assumption that caravan site accommodation will remain as popular with Gypsies & Travellers in the future as it is today.

<b>Table 3: Estimates of Continuing Household Growth 2011 to 2026: West Midlands Region (Need for pitches equates to households)</b>		
Years	Assumed annual growth rate	Estimated increase in households
2011 to 2016	3%	220
2016 to 2021	2.5%	210
2021 to 2026	2%	190

<sup>8</sup> Communities and Local Government (2007) *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies*, available at: [http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings\\_id1508209.pdf](http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings_id1508209.pdf)

<sup>9</sup> See footnote 8 above

32. The estimates show continuing growth in the Gypsy & Traveller population. Making pitch provision on the basis of the estimates in Tables 2 and 3 would allow (more of) the population increase generated in the Region to be accommodated in the Region and would change the static level of provision apparent since around 2000.

33. There are many assumptions involved in making such estimates of requirements for additional residential pitches for Gypsies & Travellers. For example, whilst growth from within the existing Gypsy & Traveller community is included, potential influxes of family members from elsewhere are not. The figures in Tables 2 and 3 are interim assessments which will be revised in the light of GTAA findings.

### **Transit Pitch Requirement**

34. Requirements for transit sites or stopping places to facilitate the Gypsy & Traveller travelling lifestyle are not covered in the above analysis, and the formula approach used does not include such requirements.

35. In the absence of completed GTAAs, there is no available evidence of transit pitch needs beyond the estimates made in the CURS research in 2005. This estimated a need for between 60 and 90 transit pitches across the Region – a significant increase over the 15 transit pitch provision on social rented sites at present. Count information shows that numbers of caravans on unauthorised encampments at snapshot dates in January and July have decreased since 2004. This suggests a need for 60 transit pitches likely to be occupied at any time. In order to function effectively, a transit site network needs pitches to be vacant for ready availability, and to take account of needs for repairs and cleaning. An interim assessment of requirement is, therefore, **120 pitches** across the Region. These are in addition to the 500 residential pitches referred to in para 28.

### **Building on the Evidence Base**

36. As outlined in Annex 1, progress on commissioning GTAAs has varied across the Region. All proposed GTAAs involve sub-regional groupings of LPAs which is especially appropriate in the context of Gypsies & Travellers. The cross-boundary working in the West of the Region involving Shropshire LPAs, Telford & Wrekin, Herefordshire and Powys is particularly commendable. It is imperative that progress is maintained on commissioning and carrying out GTAAs covering all local authorities within the Region, with the surveys being undertaken as soon as practicable.

37. The Regional Assembly will be working with local authorities to ensure that GTAA approaches and methodologies are as comprehensive and consistent as possible in order to ensure robust results across the Region. In particular, the Regional Assembly is concerned that cross-boundary issues are considered and the GTAA study areas are not treated as ‘islands’. An example of such issues is potential inflows of Gypsies & Travellers due to planning decisions elsewhere. Cross-boundary considerations include inter-regional issues.

## **Immediate Steps**

38. In accordance with ODPM Circular 01/2006, where there is clear and immediate need, LPAs should bring forward DPDs containing site allocations in advance of the full regional consideration of pitch numbers on the basis of completed GTAAs.

39. The Regional Assembly welcomes Registered Social Landlord (RSL) involvement in meeting needs in partnership with local authorities. Local Planning Authorities may wish to consider all of the following when addressing Gypsy and Traveller accommodation needs:

- Lawful Development Certificates
- Use of Section 106 agreements
- Temporary Permissions
- Land identified for Tolerated Camping (managed and refuse removal, plus toilet provision catered for)
- Expanding existing sites
- Planning application – private applications as departure from the local plan
- Allocating some exiting land identified for social housing provision, or marginal land for site provision in order to facilitate Gypsy and Traveller site planning applications
- Including Gypsy and Traveller site provision in Local Development Plan work on Housing (or bringing forward a separate Development Plan Document)

40. In addition local authorities may also wish to consider the following general points:

- Developing communications strategies, as part of their overall work on Community Cohesion
- Taking advantage of 100% funded Government grant for new site provision

41. The Regional Assembly's Regional Housing Executive gives advice to Ministers and will definitely aim to maximise value for money from Government grants.

## **Policy Questions and Issues for the RSS Revision on Gypsy & Traveller Issues**

42. Full consideration of Gypsy & Traveller site provision will take place in the RSS Revision process. GTAA information should be available for most of the Region in time to develop Options by summer 2008. This will provide a more robust evidence base than is currently available. There are a number of issues which will have to be considered in some detail in the RSS Revision in addition to reviewing regional pitch requirements in the light of new evidence from GTAAs. Such issues are identified below to ensure that ongoing GTAAs, LPAs and other agencies can prepare evidence for addressing them at an appropriate stage.

43. The RSS Revision will consider the **allocation of pitch requirements between LPAs** in line with assessed needs and a strategic view of how they can best be met. Options for the allocation of pitches will need to be developed with the help of advice from strategic authorities, and will be the subject of consultation and Sustainability Appraisal. As noted, current provision is concentrated in relatively few LPAs suggesting that ‘need where it arises’ will also be concentrated. In moving towards a strategic view of future provision, the RSS may move to an assessment of ‘need where it should be met’. There are arguments on grounds of equity that future provision should be less concentrated than current provision, so long as this is compatible with sustainable site development. There are also arguments on the basis of choice so that Gypsies & Travellers should be able to live on authorised sites in every LPA, which is not currently possible. This will raise issues around:

- The extent to which pitch requirements can reasonably be re-allocated from where they currently appear to arise.
- The distance over which re-allocation might be made and still prove sustainable, bearing in mind reasonable desires to maintain family and support links.
- The criteria to be used in making such re-allocations (for example employment opportunities for Gypsies & Travellers, main road access, Green Belts, environmental and landscape protection areas).

The ‘tool’ referred to in paragraph 24 above sets out a series of questions to assist Regional Planning Bodies in their consideration of such issues<sup>10</sup>.

44. Gypsy & Traveller communities are diverse and complex. The RSS Revision process must acknowledge this and consider the implications of such **diversity and complexity**. Three potential factors are:

- The locational preferences of different Gypsy & Traveller groups appear to differ – for example, New Travellers often favour remote rural areas, while Irish Travellers favour areas close to urban markets for their work.
- The diversity and likelihood of incompatible lifestyles within the whole ‘Gypsy & Traveller’ population mean that indiscriminate mixing will not be sustainable on sites. This is a complex issue, and certainly not simply a matter of ethnicity. There are examples of successful, well-managed sites with Gypsy and Irish Traveller families living together and other less successful ‘single group’ sites where inter-family tensions cause problems.
- The RSS Revision will include consideration of the requirements of Travelling Showpeople who are likely to have different lifestyle and needs, in addition to other groups of Gypsies and Travellers.

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<sup>10</sup> Communities and Local Government (2007) *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies*, Section 4.3, available at: [http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings\\_id1508209.pdf](http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings_id1508209.pdf)

The implications of such considerations are that a variety of site provision will be appropriate – in different locations, of different sizes and designs. Several small sites might often be more appropriate than fewer larger sites – a pitch allocation of 40 in an area could rarely be most appropriately met by a single 40-pitch site.

45. A further aspect of variety to be planned for is the distinction between ‘residential’ and ‘transit’ sites that is providing for **longer-term accommodation needs and for transient need to facilitate travelling**. Both will be planned for in the provision of culturally-appropriate accommodation for Gypsies & Travellers.

46. **Ensuring delivery** is an important element in the RSS process. In the context of site provision this means providing sustainable sites in the sense that Gypsies & Travellers will want to live there and can gain access to the provision made. This raises issues such as:

- The importance of meeting demands and aspirations as well as need in provision, for example in allocating appropriate locations and (for social rented provision) appropriate site size and design<sup>11</sup>. Regional GTAAs should provide relevant information on these matters.
- Facilitating a mix of tenures to accommodate Gypsies & Travellers aspiring to owner-occupation of family sites as well as those preferring or only able to afford social rented accommodation. While extremely valuable, provision of social rented sites will not meet all requirements, and if aspirations towards ownership are ignored, unauthorised development could continue alongside social provision.
- Exploring new delivery mechanisms to facilitate site development by Gypsies & Travellers themselves through land release and possible financial assistance while avoiding speculation and profiteering through enhanced land prices.
- The possible need for the refurbishment of existing sites in order to make them more sustainable for the future.

There will be implications for, and links with, the Regional Housing Allocations Strategy, and with other strategies to ensure that site provision is planned in conjunction with health, education and housing-related support services to ensure sustainability and redress social exclusion.

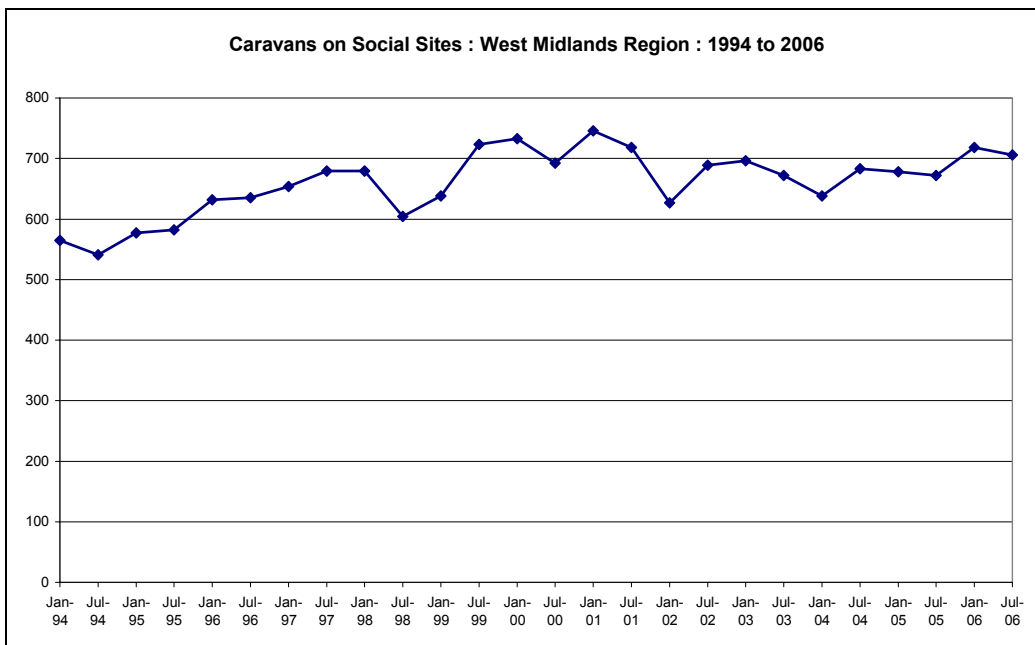
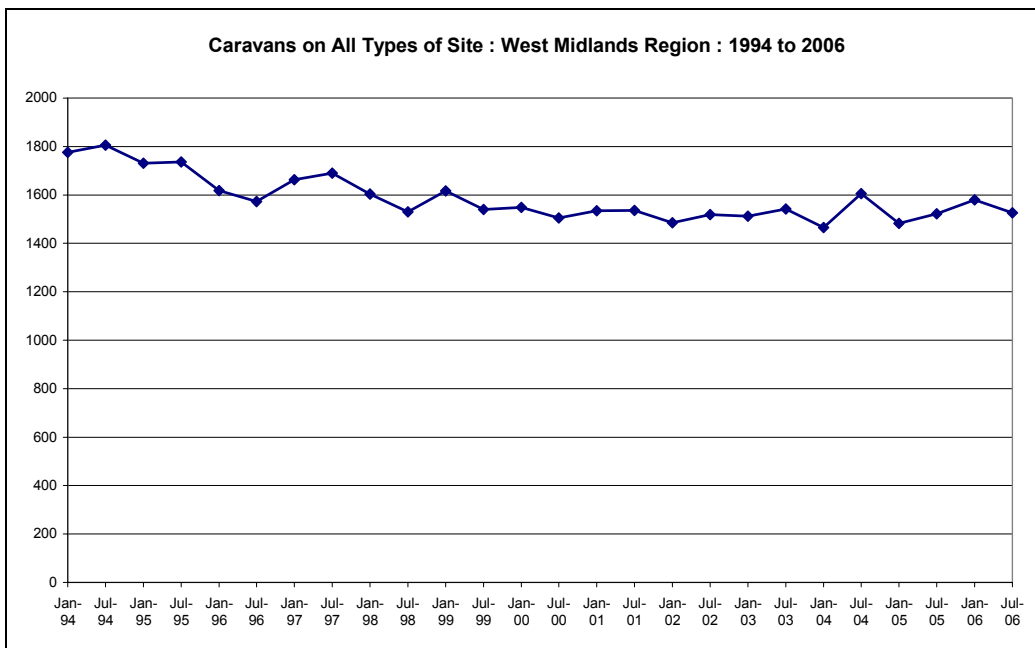
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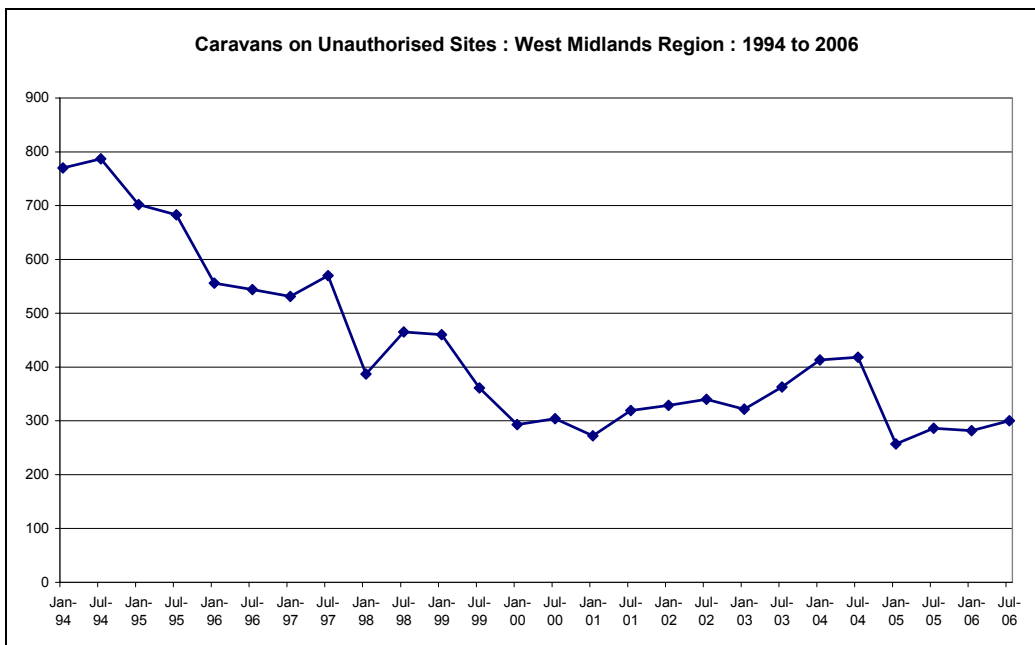
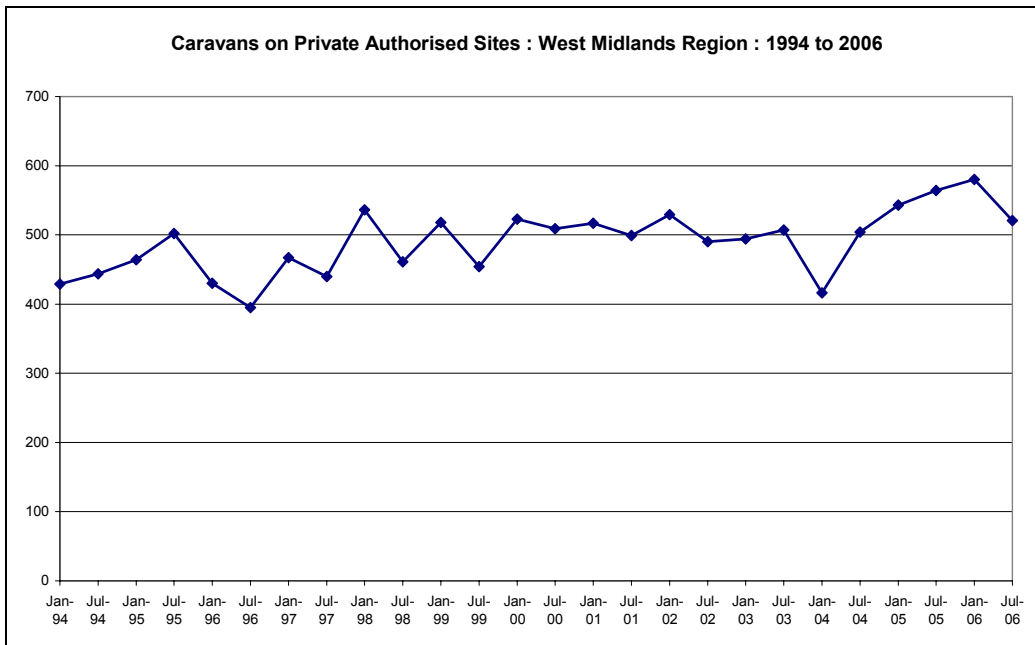
<sup>11</sup> The Communities and Local Government Gypsy & Traveller Unit is preparing site design guidance.

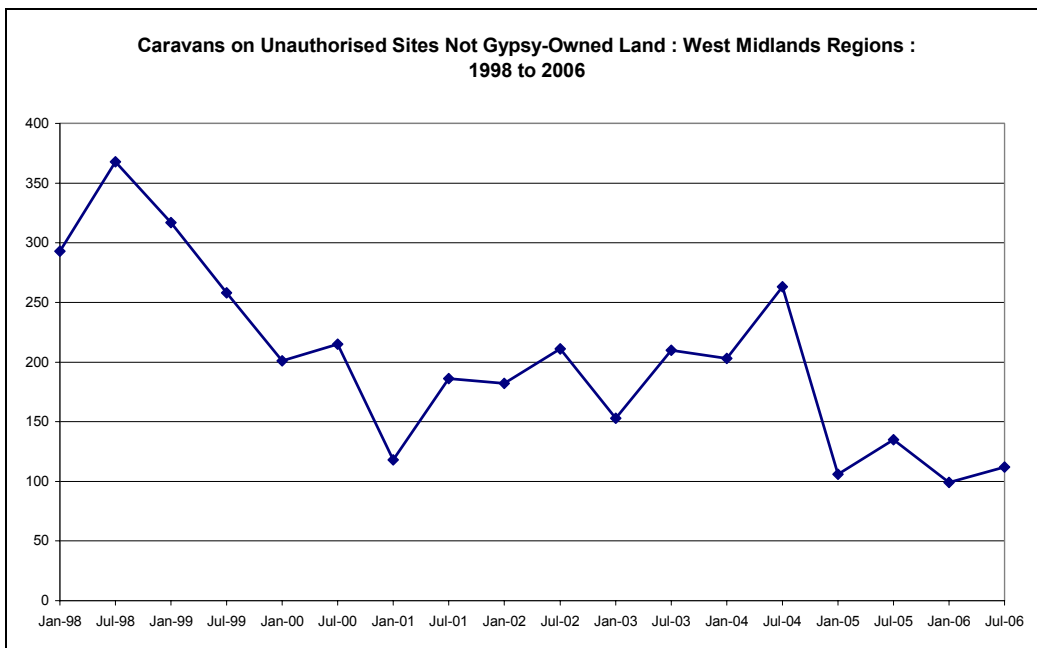
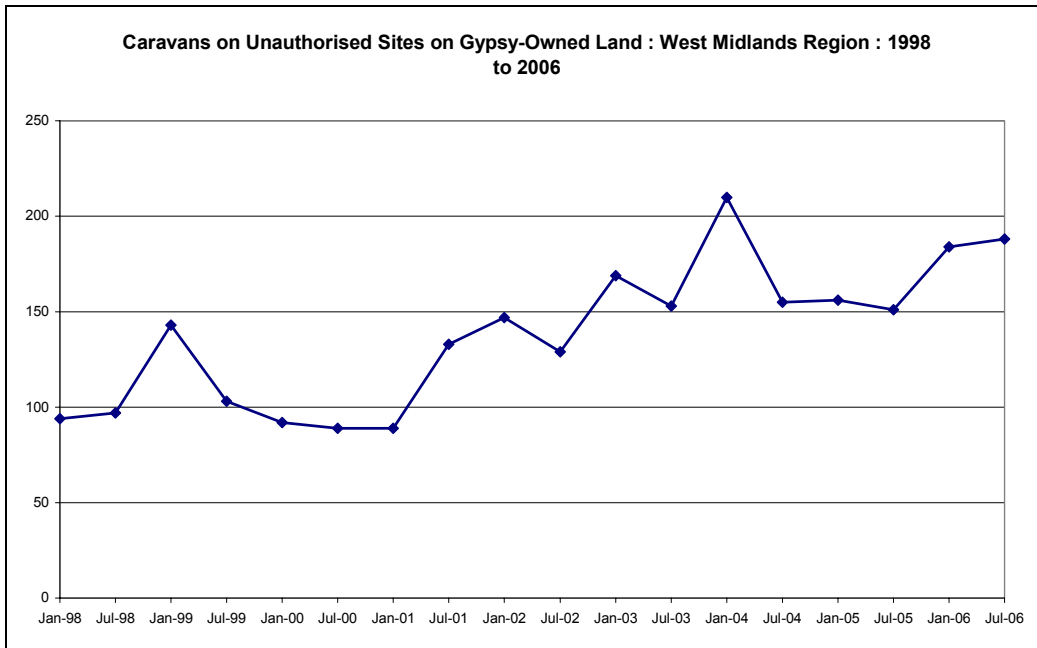
**Annex 1: Progress with Gypsy and Travellers Accommodation Needs Assessments: January 2007**

Authorities	Progress
Shropshire & Herefordshire Herefordshire Bridgnorth North Shropshire Oswestry Shrewsbury & Atcham South Shropshire Telford & Wrekin Shropshire County Council (and Powys County Council)	Contract for GTAA let (to CURS, University of Birmingham). Final report due end November 2007. A study is complete (in-house) in Herefordshire drawing on secondary data with some interviews. The Report will feed into the sub-regional GTAA.
South HMA Stratford-on-Avon Warwick Bromsgrove Malvern Hills Redditch Wychavon Wyre Forest Warwickshire and Worcestershire County Councils	Commissioning a census of 350 families, aiming for an 80% response rate. Will be done in-house with limited consultancy support. Interviews January-March 2007; interim report Spring 2007; follow up interviews Summer 2007; final report early Autumn 2007. Some work has already been carried out in Wychavon with Gypsies and Travellers including in housing.
North Staffordshire East Staffordshire Newcastle under Lyme Stafford Staffordshire Moorlands Stoke on Trent	Sub-regional GTAA commissioned (SHUSU, University of Salford). Final report due November/December 2007. No previous assessments.
Central HMA Cannock Chase Lichfield South Staffordshire Tamworth North Warwickshire Nuneaton & Bedworth Rugby	Sub-regional GTAA tendered March 2007 with final report date for end December 2007.
Black Country Dudley Sandwell Walsall Wolverhampton	Sub-regional GTAA tendered March 2007 with final report due October 2007 Wolverhampton has an interim assessment (CURS, University of Birmingham).
Birmingham, Coventry and Solihull	Committed to carrying out a joint GTAA.

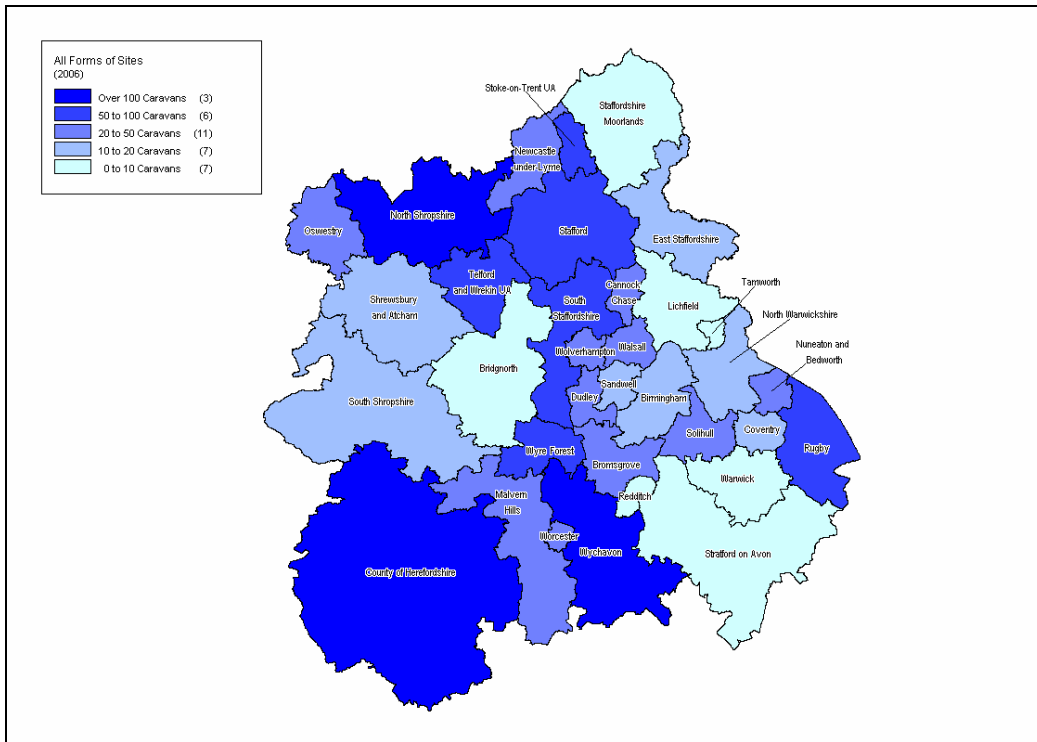
## Annex 2: Charts Showing Regional Caravan Numbers 1994 to 2006



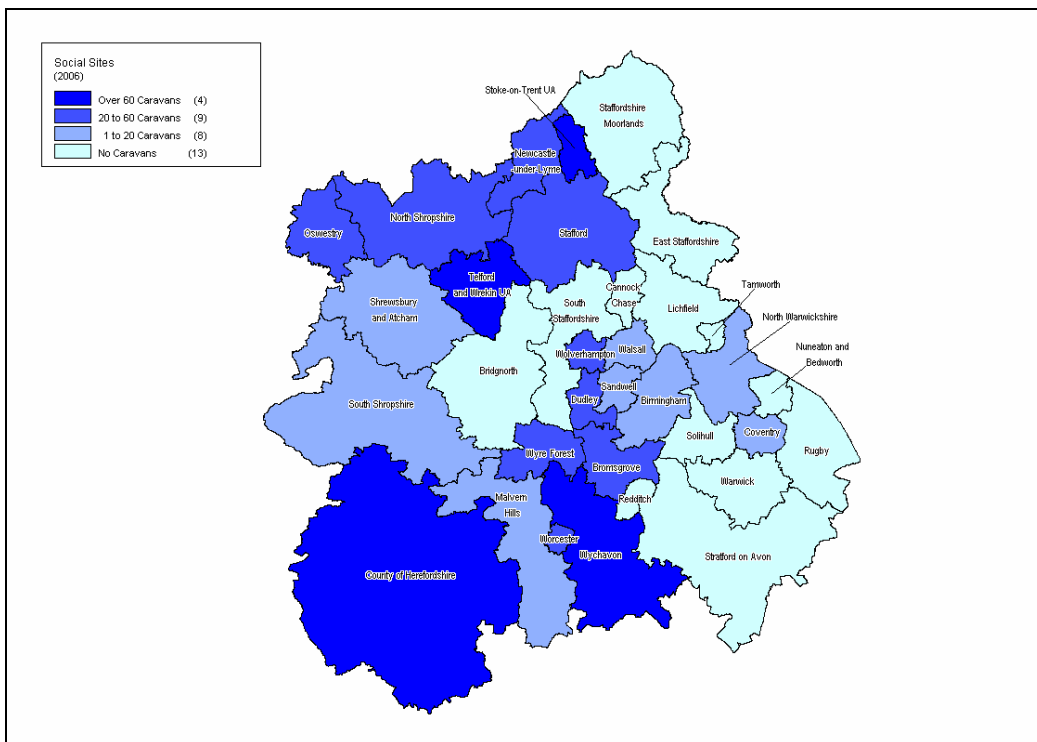




## Number of Caravans on All Types of Site: January 2006

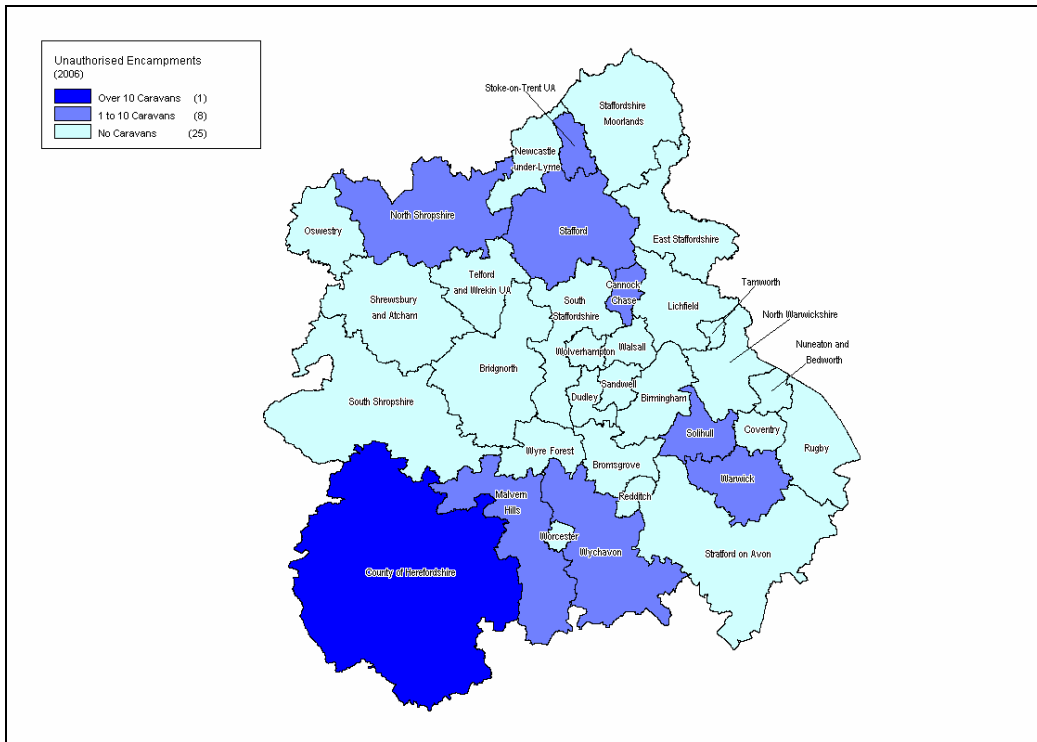


## Number of Caravans on Social Rented Sites: January 2006





## Number of Caravans on Unauthorised Encampments: January 2006



### **Annex 3: Method Proposed for Assessing Regional Residential Pitch Requirements in the Absence of Completed GTAAs**

The formula devised seeks to estimate requirements from published Caravan Count information. It assumes:

- The basic unit of analysis should be an area covered by a GTAA (often a group of local authorities) or a county area.
- At GTAA or county area level, all needs arising from unauthorised development should be met in full. Count caravan numbers are converted to pitch requirements by dividing by 1.7<sup>12</sup> (the average number of caravans per pitch found across a number of benchmarked GTAAs). This figure can be varied if local information suggests that a different figure is more appropriate.
- Other pitch requirements are related to the number of authorised pitches in a study area. This is mainly because an important element in pitch requirements is overcrowding/doubling up on existing sites and family growth from those sites. Again 1.7 (or other figure as appropriate) is used to convert caravans in the Count to pitches on authorised sites.
- The nature of the relationship between requirement minus unauthorised development and current authorised pitches was tested empirically using benchmarked GTAAs. In a study which appeared both to be robust and to produce results broadly similar to others across the country, the GTAA-assessed requirement less the number of unauthorised development pitches represented around 40% of current authorised pitches. The study which produced a higher percentage might be argued to be a special case. Those which produced lower percentages could objectively be seen to under-state requirements.

Thus the formula proposed is:

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

By expressing requirements from all factors other than unauthorised development as a percentage of current authorised pitches, the formula essentially conflates the different elements in need and supply into a single composite figure. It thus represents current shortage and concealed households, future household growth, net movement between sites and houses, net movement into and out of the study area, an allowance for need for residential pitches from unauthorised encampment and supply factors.

Regional pitch requirements are the sum of the individual GTAA or county area assessments.

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<sup>12</sup> This is the factor (average number of caravans per pitch) used in the DCLG 2007 published advice. This has been modified for use in the West Midlands for this Interim Statement as explained in para 25.

#### Annex 4: Calculation of Regional Residential Pitch Requirements

Authority	GTAA	Caravans in Caravan Count January 2006		Calculated pitches at 1.5 caravans per pitch		Estimated requirement for additional residential pitches
		Authorised sites	Unauthorised development	Authorised sites	Unauthorised developments	
Herefordshire	Shropshire Hereford- shire & Powys	73	62*			
Bridgnorth		0	0			
North Shropshire		99	0			
Oswestry		34	0			
Shrewsbury & Atcham		15	0			
South Shropshire		13	0			
Telford & Wrekin		69	0			
<b>Sub-region</b>			<b>303</b>	<b>62</b>	<b>202</b>	<b>41</b>
Stratford-on-Avon	South HMA	50	28			
Warwick		0	0			
Bromsgrove		30	0			
Malvern Hills		20	3			
Redditch		0	0			
Worcester		35	0			
Wychavon		240	50			
Wyre Forest		55	0			
<b>Sub-region</b>			<b>430</b>	<b>81</b>	<b>287</b>	<b>54</b>
East Staffordshire	North Staffs	14	0			
Newcastle under Lyme		21	0			
Stafford		67	10			
Staffordshire Moorlands		0	1			
Stoke on Trent		70	0			
<b>Sub-region</b>			<b>172</b>	<b>11</b>	<b>115</b>	<b>7</b>

\*Herefordshire figure for caravans/pitches on tolerated unauthorised encampments

Authority	GTAA	Caravans in Caravan Count January 2006		Calculated pitches at 1.5 caravans per pitch		Estimated requirement for additional residential pitches
		Authorised sites	Unauthorised development	Authorised sites	Unauthorised developments	
Cannock Chase	Central HMA	36	0			
Lichfield		0	8			
South Staffordshire		78	11			
Tamworth		0	0			
North Warwickshire		6	7			
Nuneaton & Bedworth		37	8			
Rugby		61	32			
<b>Sub-region</b>		<b>218</b>	<b>66</b>	<b>145</b>	<b>44</b>	<b>102</b>
Dudley	Black Country	39	3			
Sandwell		15	0			
Walsall		19	8			
Wolverhampton		40	7			
<b>Sub-region</b>		<b>113</b>	<b>18</b>	<b>75</b>	<b>12</b>	<b>42</b>
Birmingham	B'ham, Coventry & Solihull	15	0			
Coventry		12	0			
Solihull		35	7			
<b>Sub-region</b>		<b>62</b>	<b>7</b>	<b>41</b>	<b>5</b>	<b>20</b>
<b>Region</b>		<b>1298</b>	<b>245</b>	<b>865</b>	<b>163</b>	<b>508</b>