

Maidstone Borough Council

Gypsy and Traveller Accommodation Assessment (GTAA)

Interim Report

January 2023



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Please note that this is an Interim GTAA Report. The data that has been used to complete the interim assessment of need was collected before and during the COVID-19 pandemic period when there were a range of travel and access restrictions put in place by the Government.

This resulted in a number of sites where it was not possible to complete household interviews as they were not accessible during the extended fieldwork period. It also meant that it was not possible to complete the planned engagement with households living in bricks and mortar.

Whilst it was not possible to engage with households living on all sites and yards in Maidstone, extensive modelling has been completed to seek to provide a robust estimate of need for the period to 2039/40. Work is currently underway to prepare a comprehensive update of the GTAA and this work is due to be completed by May 2023.

The Interim GTAA Report also takes account of any changes to legislation, policy and guidance that have been put in place since the baseline date of January 2021. These include the NPPF (2021), the PPG (2021), the Levelling Up and Regeneration Bill (2022), and the Court of Appeal judgement in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others* (2022).

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1. Executive Summary

Introduction and Methodology

- 1.1 The primary objective of this Interim Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showmen accommodation in Maidstone Borough Council (the Council).
- 1.2 Work to complete the GTAA commenced in November 2019 and it was possible to visit a large number of sites and yards in Maidstone to complete household interviews before the COVID-19 lockdown was put in place in March 2020. Following the lockdown, attempts were made to contact households and complete interviews over the telephone, and it was possible to complete a further proportion of the fieldwork remotely between March 2020 and January 2021.
- 1.3 However, at the time of reporting, it had not been possible to make contact with a total of 40 Gypsy and Traveller sites comprising 88 pitches. This means that interviews were completed on 79% of sites and yards in Maidstone and that it was not possible to complete interviews on 21% of sites and yards. It was also not possible to complete planned engagement with households living in bricks and mortar due to COVID-19 restrictions – although it was possible to complete interviews with 8 households in bricks and mortar through contacts provided during the site and yard interviews. As such, this Interim GTAA Report includes an analysis of need from sites where it was possible to complete household interviews, together robust with modelling of need for sites that it was not possible to visit.
- 1.4 Work has now commenced to complete an update of the GTAA including completing interviews on those sites where it was not possible to visit during the COVID lockdown period, together with a comprehensive review of all other sites and yards in Maidstone, and engagement with households living in bricks and mortar. It is anticipated that this review will be completed by May 2023.
- 1.5 The Interim GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showmen plots for the period 2019 to 2039/40 to cover the new Maidstone Local Plan period and the 15-year requirements set out in PPTS. The outcomes of this study supersede the outcomes of any previous GTAAs for Maidstone Council.
- 1.6 The Interim GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showmen population in Maidstone through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites, yards and encampments.
- 1.7 A total of 267 interviews or proxy interviews were completed with Gypsies and Travellers living on sites or on the roadside in Maidstone; a total of 7 interviews were completed with Travelling Showmen; and a total of 8 interviews were completed with households living in bricks and mortar. In addition, a total of 11 stakeholder interviews were completed with Officers at Maidstone Borough Council, Kent County Council and neighbouring local planning authorities.

Key Emerging Findings

Pitch Needs – Gypsies and Travellers

- 1.8 Overall, the interim pitch needs for Gypsies and Travellers for the period 2019 to 2040 are set out below. Needs are set out for those households that met the planning definition of a Gypsy or Traveller; for any undetermined households¹ on sites that were visited where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite up to three visits to each site) who may meet the planning definition; for any non-visited households on sites where it was not possible to make contact with site residents due to COVID-19 restrictions²; and for those households that did not meet the planning definition – although this is no longer a requirement for a GTAA.
- 1.9 Only the need from those households who met the planning definition and from those of the undetermined households who subsequently demonstrate that they meet it should be formally considered as need arising from the GTAA.
- 1.10 The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate.
- 1.11 The Council will need to carefully consider how to address any need associated with undetermined/non-visited Travellers as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, including those as a result of in-migration.
- 1.12 An example of a robust Criteria-Based Policy that has recently been through Examination can be found in the East Herts District Plan 2018. This was subject to an Examination in Public between October 2017 and January 2018 followed by a period of public consultation on the Main Modifications agreed through the Examination between February and March 2018. Following this, the Inspector issued her Final Report on the Examination of the East Herts District Plan 2018 in July 2018. The policy to refer to is *Policy HOU9 Gypsies and Travellers and Travelling Showmen*.
- 1.13 In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and either through separate Local Plan Policies, or through a wider Gypsy and Traveller Development Plan Document (DPD).
- 1.14 This approach is specifically referenced in the National Planning Policy Framework (February 2021). Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 62 then states that [emphasis added] ‘*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes*’. The footnote to this section states that ‘*Planning Policy*

¹ See Paragraphs 3.25-3.32 for further information on undetermined/non-visited households.

² See Chapter 3 for the methodology that was used to model need from these households.

for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

- 1.15 As an example, it is again useful to look at the East Herts District Plan 2018 that was found to be sound in an Inspectors Report that was issued in July 2018. The Local Plan contains *Policy HOU10 New Park Home Sites for Non-Nomadic (i.e. households that do not meet the planning definition of a Traveller) Gypsies and Travellers and Travelling Showmen*. This sets out that any applications for planning permission for park homes for Gypsies and Travellers and Travelling Showmen that do not meet the planning definition must be in accordance with the NPPF and PPTS and the criteria set out in Policy HOU10, and not under the criteria set out in *Policy HOU9 Gypsies and Travellers and Travelling Showmen*.
- 1.16 It is recognised that the Council are in the process of reviewing their Local Plan that sets out how overall housing need will be addressed. The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showmen.
- 1.17 There were 288 Gypsy or Traveller households identified in Maidstone that met the planning definition; 99 undetermined households on sites that were visited that may meet the planning definition; 88 non-visited households on sites that may meet the planning definition; and 40 households that did not meet the planning definition.
- 1.18 There is a need identified for **323 pitches from the 288 Gypsy and Traveller households that met the planning definition**. This is made up of 43 unauthorised pitches; 46 concealed or doubled-up households or single adults; 7 movement from bricks and mortar; 71 teenagers in need of a pitch in the next 5 years; 3 pitches with temporary planning permission; 9 from in-migration/roadside; and 146 from new household formation, using a growth rate of 1.95% derived from the household demographics. There is also supply from 2 vacant pitches on one of the public sites.
- 1.19 There is a need identified for **up to 132 pitches from the 99 undetermined Gypsy and Traveller households on sites where an interview was not able to be completed**. This is made up of 24 unauthorised pitches; 28 concealed or doubled-up households or single adults³; 33 teenagers in need of a pitch of their own in the next 5 years³; and new household formation of 47 from a maximum of 160 households (using the ORS national formation rate of 1.50%). If the ORS national average⁴ of 30% were applied this could result in a need for 40 pitches. If the locally derived proportion of households that met the planning definition (88%) were applied this could result in a need for 116 pitches.
- 1.20 There is a need identified for **up to 113 pitches from the 88 non-visited Gypsy and Traveller households**. This is made up of 18 unauthorised pitches, 25 concealed or doubled-up households or single adults³; 29 teenagers in need of a pitch of their own in the next 5 years³; and new household formation of 41 from a maximum of 142 households (using the ORS national formation rate of 1.50%). If the ORS national average of 30% were applied this could result in a need for 34 pitches. If the locally derived proportion of households that met the planning definition (88%) were applied this could result in a need for 99 pitches.
- 1.21 Whilst not now a requirement to include in a GTAA, there is a need identified for **36 pitches from the 40 Gypsy and Traveller households that did not meet the planning definition**. This is made

³ See Chapter 3 for details of how these figures were modelled.

⁴ Based on over 4,300 interviews completed by ORS across England.

up of 8 unauthorised pitches; 6 concealed or doubled-up households or single adults; 1 movement from bricks and mortar; 5 teenagers in need of a pitch in the next 5 years; 1 temporary pitch; 1 from in-migration/roadside; and 14 from new household formation, using a growth rate of 1.50% derived from the household demographics.

1.22 Figure 1 summarises the identified need and breaks this down by year periods.

Figure 1 – Need for Gypsy and Traveller households in Maidstone (2019-40)

Status	2019-24	2024-29	2029-34	2034-39	2039-40	Total
Meet Planning Definition	177	41	45	49	11	323
Undetermined	85	14	14	15	4	132
Not Visited	72	12	13	13	3	113
Do not meet Planning Definition	22	4	4	5	1	36
TOTAL	356	71	76	82	19	604

Plot Needs - Travelling Showmen

- 1.23 Overall, the interim plot needs for Travelling Showmen from 2019-2039/40 are set out below. Needs are set out for those households that met the planning definition of a Travelling Showperson; for those undetermined households where an interview was not able to be completed who may meet the planning definition; and for those households that did not meet the planning definition (although this is no longer a requirement for a GTAA).
- 1.24 Only the need from those households who met the planning definition and from those of the undetermined households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- 1.25 The need arising from households that met the planning definition should be addressed through yard allocation/intensification/expansion in Local Plan Policies.
- 1.26 The Council will need to carefully consider how to address the needs associated with undetermined Travelling Showmen as it is unlikely that all of this need will have to be addressed through the provision of conditioned Travelling Showmen plots.
- 1.27 The need for those households who did not meet the planning definition will need to be considered as part of general housing need. See Paragraphs 1.10-1.13 for further details.
- 1.28 There are 4 Travelling Showperson yards in Maidstone. The GTAA has identified a total of 6 Travelling Showmen households in Maidstone that met the planning definition; 5 undetermined households on sites that were visited that may meet the planning definition; and 1 household that did not meet the planning definition.
- 1.29 There is a need identified for **5 plots from the 6 Travelling Showmen households that met the planning definition**. This is made up of 2 teenagers in need of a plot of their own in the next 5 years; and 3 from new household formation derived from the household demographics.
- 1.30 There is a need identified for **up to 2 plots from the 5 undetermined Travelling Showmen households** and this is all from new household formation. Given that a much higher proportion of Travelling Showmen meet the planning definition it is likely that all of the need from undetermined Showmen will come from households that meet the planning definition.

- 1.31 There is a need identified for **no plots from the 1 Travelling Showmen household that did not meet the planning definition** as there are no households with children.

Figure 2 – Need for Travelling Showmen households in Maidstone (2019-2040)

Status	2019-24	2024-29	2029-34	2034-39	2039-40	Total
Meet Planning Definition	2	2	1	0	0	5
Undetermined	0	1	0	1	0	2
Do not meet Planning Definition	0	0	0	0	0	0
TOTAL	2	3	1	1	0	7

Transit Recommendations

- 1.32 Due to low historic low numbers of unauthorised encampments, it is not recommended that there is a need for a formal public transit site in Maidstone at this time. The situation relating to levels of unauthorised encampments should continue to be monitored – for example a potential increase in the number of households travelling to seek to meet the current planning definition.
- 1.33 As well continuing to record information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 1.34 It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Kent-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 1.35 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- 1.36 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 1.37 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers.

2. Introduction

- 2.1 The primary objective of this Interim Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showmen accommodation in Maidstone. The outcomes of the study will supersede the outcomes of the previous Traveller and Travelling Showmen Accommodation Needs Assessments completed in Maidstone.
- 2.2 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showmen under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2021, and the Planning Practice Guidance (PPG) 2021.
- 2.3 Work to complete the GTAA commenced in November 2019 and it was possible to visit a large number of sites and yards in Maidstone to complete household interviews before the COVID-19 lockdown was put in place in March 2020. Following the lockdown, attempts were made to contact households and complete interviews over the telephone, and it was possible to complete a further proportion of the fieldwork between March 2020 and July 2020. However, at the time of reporting, it has not been possible to make contact with households on a total of 40 sites comprising 88 pitches (21% of all sites and yards). It was also not possible to complete planned engagement with households living in bricks and mortar. As such, this GTAA Report includes an analysis of need from sites where it was possible to complete household interviews, together with modelling of need for sites that it was not possible to visit.
- 2.4 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showmen accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of Traveller pitches and plots covering the period 2019 to 2039/40 to meet the new Maidstone Local Plan period and the 15-year requirements of the PPTS. As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- 2.5 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 Showmen, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showmen) Accommodation Assessment (GTAA).
- 2.6 The baseline date for the study is January 2021 which was when the initial round of household interviews were completed.

Definitions

- 2.7 The planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2015)

- 2.8 For the purposes of the planning system, the definition was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

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

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

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

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

For the purposes of this planning policy, “travelling Showmen” means:

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

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 2.9 The key change that was made to both definitions was the removal of the term “*persons...who have ceased to travel permanently*”, meaning that those who have ceased to travel permanently will no longer fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 2.10 One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘*nomadic*’.
- 2.11 **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 2.12 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent

site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.

- 2.13 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 2.14 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- 2.15 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 2.16 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- 2.17 The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as holidays and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- 2.18 It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependents with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- 2.19 Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled for work in the past. In addition, households will also have to demonstrate that they plan to travel again for work in the future.
- 2.20 This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed

anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

- 2.21 This was further reinforced in a more recent Decision Notice for an appeal in Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander of travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

- 2.22 Decision-making for policy concerning Gypsies, Travellers and Travelling Showmen 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 key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showmen:

- » The Housing Act, 1985
- » Planning Policy for Traveller Sites (PPTS), 2015
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2021
- » Planning Practice Guidance⁵ (PPG), 2021

- 2.23 In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

- 2.24 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showmen is set out in the PPTS (2015). It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition, the Housing and Planning Act makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showmen households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

⁵ With particular reference to the sections on *Housing needs of different groups* (July 2019).

Planning Policy for Traveller Sites (PPTS) 2015

2.25 PPTS (2015), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » *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.*

2.26 In practice, the document states that (PPTS Paragraph 9):

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

2.27 PPTS goes on to state (Paragraph 10) 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.*
- » *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.*

2.28 Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS 2015 also notes in Paragraph 11 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.*

National Planning Policy Framework (NPPF) 2021

2.29 The most recent version of the NPPF was issued in July 2021. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.

2.30 Paragraph 62 then states that [emphasis added] *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes'*. The footnote to this section states that *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*

2.31 This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

2.32 In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (APP/P0240/C/18/3213822) the Inspector concluded in relation to Paragraph 61 of the NPPF that:

It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging LP. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs.

Levelling-up and Regeneration Bill (2022)

2.33 Among other things, this Bill seeks to make provision about town and country planning. Whilst there is currently no specific reference to changes to policy and guidance for Gypsies and Travellers, the Council may need to consider the outcomes of any changes to planning legislation that may impact on the accommodation needs of Gypsies and Travellers.

Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

- ^{2.34} In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.
- ^{2.35} Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it has not been quashed or declared unlawful at this time.
- ^{2.36} It is too early to properly identify the impact that the judgement will have on an assessment of need for Travellers. However, the approach taken by ORS does include an assessment of need for all Travellers, and should any changes be made to the PPTS planning definition of a Traveller, the outcomes of the GTAA can be amended accordingly.

3. Methodology

Background

- 3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showmen Accommodation Needs Assessments. This has been updated in light of changes to PPTS in August 2015, the Housing and Planning Act (2016), the NPPF (2021) and the PPG in 2021. It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 The methodology, including some changes to fieldwork and needs analysis, was revised in 2020 to take account of travel and social distancing restrictions as a result of COVID-19.
- 3.3 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showmen.
- 3.4 ORS would note that since the changes to the PPTS in August 2015 the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Blaby, Cambridge, Castle Point, Central Bedfordshire, Chelmsford, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- 3.5 An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded:
- '...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'*
- 3.6 The Inspector for the East Herts District Plan 2018 also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:
- 'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'*

Glossary of Terms/Acronyms

3.7 A Glossary of Terms/Acronyms can be found in **Appendix A**.

Desk-Based Review

3.8 ORS collated a range of secondary data that was used to support the study. This included:

- » Census data.
- » Traveller Caravan Count data.
- » Records of unauthorised sites/encampments.
- » Information on planning applications/appeals.
- » Information on enforcement actions.
- » Existing Needs Assessments and other relevant local studies.
- » Existing national and local policy, guidance, and best practice.

Stakeholder Engagement

3.9 Engagement was undertaken with key Council Officers from Maidstone through telephone interviews. Five interviews were completed with Council Officers from the study area. In addition, an interview was completed with an Officer from Kent County Council.

Working Collaboratively with Neighbouring Planning Authorities

3.10 To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities. These interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Councils set out below:

- » Ashford Borough Council.
- » Medway Council.
- » Swale Borough Council.
- » Tonbridge and Malling Borough Council.
- » Tunbridge Wells Borough Council.

Survey of Travelling Communities

3.11 As a result of travel and social distancing restrictions due to COVID-19 in March 2020 a 2-stage methodology was used to try and complete the site and yard fieldwork.

Stage 1 – Face-to-Face Interviews (November 2019-March 2020)

3.12 Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots.

- 3.13 In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 visits were made to households where it was not initially possible to conduct an interview because they were not available at the time.
- 3.14 Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need – and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.
- 3.15 ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The site interview questions that were used (see **Appendix E**) have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the planning definition. Members of ORS’ dedicated team of experienced Researchers who work on our GTAA studies across England and Wales sought to visit all sites and yards. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 3.16 Researchers also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.17 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).
- 3.18 Researchers also distributed copies of an information leaflet that was prepared by Friends, Families and Travellers explaining the reasons for the need to complete the household interview as part of the GTAA process.

Figure 3 – Friends, Families and Traveller Leaflet



Stage 2 – Telephone Interviews (April 2020-January 2021)

- 3.19 Following the travel and social distancing restrictions as a result of COVID-19 that were put in place in March 2020, ORS' Researchers sought to complete any outstanding site and yard interviews over the telephone. Letters and reminder letters were sent to residents on all sites and yard where contact had not been able to be made during the face-to-face interviews. The wording of the letters was agreed with members of the Travelling Community, and asked households to call ORS Researchers to complete an interview over the telephone. In addition, for sites where some contact had been made but where not all interviews had been completed, ORS Researchers contacted households who had been interviewed and asked them to share our contact details with other households, or to provide information to complete a proxy interview. Finally, ORS worked with Officers from Kent County Council who are responsible for managing the public sites in Maidstone to obtain details of households where it was not possible to complete an interview.
- 3.20 Between July 2020 and January 2021 when some of the travel and social distancing restrictions were relaxed in England, ORS completed a detailed COVID-19 Risk Assessment that allowed for limited fieldwork activities to resume. At the time of the fieldwork these were restricted to making observational visits to sites to confirm site names, occupancy levels, and where possible to share contact details whilst observing social distancing requirements.

Engagement with Bricks and Mortar Households

- 3.21 The 2011 Census recorded 168 households that were identified as either Gypsies or Irish Travellers who lived in a house, bungalow or flat in Maidstone.
- 3.22 ORS seek to apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts are sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; and other local knowledge from stakeholders. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known during the face-to-face phase of the fieldwork.
- 3.23 In addition, a series of drop-in sessions were planned for April 2020 in areas where the 2011 Census showed that there were higher than average numbers of Gypsies and Irish Travellers living in bricks and mortar. Unfortunately, due to the travel and social distancing restrictions due to COVID-19, it was not possible to hold these sessions and they will be rearranged when the update to the GTAA is completed in 2023.
- 3.24 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity put in place.

Timing of the Fieldwork

- 3.25 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also avoid days of known local or national events. However, due to COVID-19 the fieldwork was completed over an extended period between November 2019 and January 2021.

Applying the PPTS (2015) Planning Definition

- 3.26 The primary change to PPTS (2015) in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. The revised PPTS was issued in 2015 and a number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that household members need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age.
- 3.27 The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
- » Whether any household members have travelled in the past 12 months.
 - » Whether household members have ever travelled.
 - » The main reasons for travelling.
 - » Where household members travelled to.
 - » The times of the year that household members travelled.
 - » Where household members stay when they are away travelling.
 - » When household members stopped travelling.
 - » The reasons why household members stopped travelling.
 - » Whether household members intend to travel again in the future.
 - » When and the reasons why household members plan to travel again in the future.
- 3.28 When the household survey was completed, the answers from these questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. This included information on the type of work that is undertaken; which family members travelled for work; the times of year that family members travel for work; the duration of trips for work; and where family members stay when travelling away from home for work.
- 3.29 The same definition applies to Travelling Showmen as to Gypsies and Travellers.

- 3.30 Households that need to be considered in the GTAA fall under one of three classifications that will determine whether their housing needs will need to be assessed in the GTAA. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
- » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily under the planning definition.
 - » Households where an interview was not possible who may fall under the planning definition.
- 3.31 Whilst the needs of those households that do not meet the planning definition no longer need to be included in a GTAA, they have been assessed and included in this report to provide the Council with components of need to consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the NPPF (2021).

Undetermined and Not Visited Households

- 3.32 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed, households that were not present during the fieldwork period, or on sites where it was not possible to visit due to COVID-19 restrictions) need to be assessed as part of the GTAA where they are believed to be Gypsies and Travellers who may meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed; an approach has been taken that seeks an estimate of potential need from these households. This will be an additional need figure over and above the need identified for households that do meet the planning definition.
- 3.33 The estimate seeks to identify potential current and future need from any pitches known to be temporary or unauthorised; though modelling potential need from concealed and doubled-up households and from teenagers; and through new household formation. For the latter the ORS national rate of 1.50% has been used as the demographics of residents are unknown.
- 3.34 ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- 3.35 However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showmen based on over 300 interviews that have been completed) – and in some local authorities, no households meet the planning definition.
- 3.36 ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on a representative range of sites. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.

- 3.37 Therefore, it is likely that only a proportion of the potential need identified from undetermined and not visited households will need conditioned Gypsy and Traveller pitches, and that the needs of the remainder will need to be addressed through separate Local Plan Policies.
- 3.38 The ORS methodology to address the need arising from undetermined/not visited households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:

The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.

Households that Do Not Meet the Planning Definition

- 3.39 Household where household members do not travel for work now fall outside the planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance⁶ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area, or through a separate Gypsy and Traveller DPD, and will form a subset of the wider need arising from households residing in caravans. This is echoed in the NPPF (2021).
- 3.40 Paragraph 62 of the NPPF states that [emphasis added] *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes'*. The footnote to this section states that *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*

Calculating Current and Future Need

- 3.41 To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the

⁶ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

3.42 The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within 5 years.
- » Pitches vacated by people moving to housing.
- » Pitches vacated by people moving from the study area (out-migration).

3.43 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

3.44 The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:

- » Households on unauthorised developments for which planning permission is not expected.
- » Concealed, doubled-up or over-crowded households (including single adults).
- » Households in bricks and mortar wishing to move to sites.
- » Households in need on waiting lists for public sites.

Future Need

3.45 The final stage was to identify components of future need. This includes the following four components:

- » Teenage children in need of a pitch of their own in the next 5 years.
- » Households living on sites with temporary planning permissions.
- » New household formation.
- » In-migration.

3.46 Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.

- 3.47 All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showmen. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showmen are identified separately.

Modelling Current and Future Need

- 3.48 Given the large number of households that it was not possible to complete an interview with as a result of travel and social distancing restrictions due to COVID-19, work was undertaken to model current need from concealed or doubled-up households and single adults, and from teenagers in need of a pitch of their own in the next 5 years. This was undertaken by calculating the average numbers of each component of need from the households where interviews were completed, and then applying these figures to the households where an interview was not able to be completed. This resulted in the following multipliers being applied:

- » Average number of concealed/doubled-up per household = 0.28.
- » Average number of teenagers in need of a pitch of their own per household = 0.33

Pitch Turnover

- 3.49 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any local need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 3.50 In addition, a recent GTAA Best Practice Guide produced jointly by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

- 3.51 As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

- 3.52 GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.
- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
 - » **Emergency stopping places** - more limited facilities.
 - » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
 - » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.
- 3.53 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.
- 3.54 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.
- 3.55 Another alternative is ‘negotiated stopping’. The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- 3.56 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- 3.57 The Criminal Justice and Public Order Act 1994 (Section 62a) 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 and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- 3.58 Consideration will also have to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.

^{3.59} In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Department for Levelling Up, Housing and Communities (DLUHC)⁷ Traveller Caravan Count. The outcomes of discussions with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

⁷ Formerly the Ministry for Housing, Communities and Local Government (MHCLG).

4. Gypsy, Traveller & Travelling Showmen Sites & Population

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showmen. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁸. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showmen, 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 Showmen. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showmen are required in the study area.
- 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 tenants (similar to social housing).
- 4.3 The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showmen. 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 Showmen yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showmen population also has other types 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 occupancy 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 Showmen 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 landowner, but for which they do not have planning

⁸ Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

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

Sites and Yards in Maidstone

- 4.6 In Maidstone, at the base date for the GTAA, there were 2 public sites (32 pitches); 148 private sites with permanent planning permission (375 pitches); 2 sites with temporary planning permission (4 pitches); no sites that are tolerated for planning purposes; and 37 unauthorised sites (101 pitches). There were also 4 Travelling Showmen’s yards (17 plots) and there was no public transit provision. See **Appendix D** for further details.

Figure 4 - Total amount of provision in Maidstone (July 2020)

Category	Sites/Yards	Pitches/Plots
Public sites	2	32
Private with permanent planning permission	148	375
Private with temporary planning permission	2	4
Tolerated sites	0	0
Unauthorised sites	37	101
Public transit sites	0	0
Travelling Showmen yards	4	17
TOTAL	193	529

DLUHC Traveller Caravan Count

- 4.7 Another source of information available on the Gypsy, Traveller and Travelling Showmen 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 DLUHC. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013 it was renamed the Traveller Caravan Count due to the inclusion of data on Travelling Showmen.
- 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 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 later in this report.

5. Stakeholder Engagement

Introduction

- 5.1 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This engagement took the form of telephone interviews.
- 5.2 The aim of the interviews was to provide a general understanding of current provision and possible future need; details about short-term encampments; details about transit provision; and details about any cross-border issues.
- 5.3 Five interviews were completed with Council Officers from the study area, and one interview was completed with an Officer from Kent County Council (KCC).
- 5.4 As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from five neighbouring local authorities:
- » Ashford Borough Council
 - » Medway Council
 - » Swale Borough Council
 - » Tonbridge & Malling Borough Council
 - » Tunbridge Wells Borough Council
- 5.5 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. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.
- 5.6 It should be noted that the stakeholder interviews were completed during 2020 and will be updated as part of the review of the GTAA in 2023.

Views of Key Stakeholders and Council Officers in Maidstone

Accommodation Needs

- 5.7 Since the last GTAA, the Council introduced a new Allocation Scheme in April 2020 which indicates how applicants are assessed, and how vacant plots will be allocated
- 5.8 Most of the need identified in the last GTAA has been met through windfall provision.
- 5.9 It is believed that the public sites are currently meeting the need. This was proposed as there is generally not a great deal of demand for vacancies when they occur. However, feedback gathered by the Council does suggest that Travellers in the area predominantly favour having privately-owned sites, rather than living on a publicly owned one.

- 5.10 Funding has been earmarked to upgrade the facilities on the two public sites at Stilebridge and Water Lane. In addition to improving the living conditions for Travellers currently living at those sites, it is also hoped that the investment will encourage Travellers to stay on the site when the upgraded pitches become available.
- 5.11 It has been difficult to create new public provision due to intervention from local residents.
- 5.12 Maidstone have historically had a large travelling population due to landscaping and fruit picking work availability. Over the years that need has grown and it appears to be growing exponentially given that the families who are in Maidstone are also expanding.
- 5.13 Kent County Council own and manage 8 Public Gypsy and Traveller sites in total in Kent and manage 2 Sites on behalf of Maidstone Borough Council. The County Council also provide 'out of hours' cover for site management emergencies and management of unauthorised encampments.

Short-term Encampments and Transit Provision

- 5.14 Short-term unauthorised encampments are infrequent, and the numbers are said to be reducing over recent years.
- 5.15 This reduction was attributed to a change in the enforcement approach to encampments and then use of Community Protection Notices. However, the majority of encampments were only said to stay for 24-hour periods and only stop in the area as they pass through; these are also commonly the same family units each year.
- 5.16 There are ongoing transit provision discussions at a Kent-wide level as there is currently no such provision across the county. However, as of yet no authority has put themselves forward as a location to host a transit site.
- 5.17 The County Council are currently in negotiation with local Councils to address this problem and it is hoped that a negotiated site will be established soon in the North East of the County. However, transit provision is not solely a county matter. The districts have responsibility for their own GTAA assessments and the recommendations from the assessments will inform the need for appropriate transit or negotiated stopping sites provision.
- 5.18 The County Council also act as lead for the removal of all unauthorised encampments on Highways and County Council owned property or land.

Cross Border Issues

- 5.19 Kent-wide meetings are held to see how the authorities can better work together on Gypsy and Traveller issues. However, it was thought that greater sharing of the obligation to accommodate need in the County would be better than how need is currently and has previously been dealt with. This was suggested as it was believed that members of the settled community in areas with large Traveller populations often feel that other locations are not being suitably utilised.
- 5.20 Cross-border joint working was said to be getting better when it comes to dealing with unauthorised encampments. However, it was felt this is something that could be much improved to help deal with provision for public and private sites. It was felt that more formal joint working was needed and that the sharing of information could help to house Travellers that are in need of accommodation all across the County, wherever there is existing availability at certain

locations. The belief is that this will help disperse the pressure that is put on authorities experiencing substantial need.

- 5.21 It was suggested that Maidstone and its neighbouring authorities are all complying with Duty to Cooperate, although it was suggested that the Duty to Cooperate should go further than it currently does – especially for those areas with high levels of local need.

Future Priorities

- 5.22 Maidstone have had difficulties in the past when trying to purchase a new site for public use. When it became publicly known that the Council were trying to purchase land for a new site then the local community pooled resources together in order to out-bid the Council for the land. Such barriers make it extremely difficult for the Council to be able to provide the necessary provision and they would ideally like to avoid such instances in the future.
- 5.23 It was felt that there is a lot of pressure on Maidstone, and the individual parishes, to deliver accommodation. This has an impact on the settled community which has resulted in the difficulties identifying new public sites. It was hoped that this burden would be shared more in the future.
- 5.24 Future priority for the County Council is to continue to apply pressure and work with local authorities to establish and open suitable transit site provision. This is to enable authorities to direct unauthorised encampments to more appropriate areas.

Neighbouring Authorities

Ashford Borough Council

- 5.25 With regard to overall accommodation need in Ashford, the views of the officer interviewed were as follows:
- » Since the last GTAA, Ashford have adopted a new Local Plan and three new pitches have been allocated across two sites and they are in the process of addressing the shortfall that remains. The most recent GTAA (2018) did not identify any need for Travelling Showmen accommodation in the borough.
 - » Through continuing work on sites, pitch assessments and bi-annual caravan counts, discrepancies and/or administrative errors in the 2018 GTAA data have been highlighted. However, these discrepancies have now been rectified, leading to the identification of an additional existing supply of 8 pitches in the borough, to that which was originally counted. The baseline has been updated to reflect the correct supply figure. Furthermore, there have also been a number of planning permissions granted for permanent pitches. This has provided an additional supply of 10 pitches.
 - » Ashford are aware of short-term unauthorised encampments occurring in the area. The 2018 GTAA recommended that given the level of unauthorised encampments, the Council should consider the provision of transit pitches either for the Borough specifically or as part of a Kent-wide response.

5.26 With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- » In addition to the issue of Kent-wide transit provision, potential cross-border issues relate to sites/pitches that are on local authority boundaries. Ashford were aware that such circumstances need to be discussed at the site identification stage to meet the PPTS requirement of ensuring sites do not dominate the nearest settled community, even if outside the borough boundary.
- » In regard to cross-border joint working, Ashford are leading on establishing a joint Kent authority working group for Gypsy & Traveller issues, in particular for transit site issues.
- » It was felt that Ashford and all neighbouring authorities were complying with the Duty to Cooperate.

Medway Council

5.27 With regard to overall accommodation need in Medway, the views of the officer interviewed were as follows:

- » Since the last GTAA, Medway Council has granted 7 planning consents. These include permanent, personal, and temporary permissions., which has resulted in consent for 10 pitches. For Gypsies, Travellers and Travelling Showmen, the Council has also developed a draft policy for development management purposes and a site assessment process has also been developed.
- » Existing provision in Medway does not presently meet the needs of Travellers within the area. A total 26 pitches still need to be accounted for and the Council also need to identify a 5-year supply.
- » Transit provision was identified by the GTAA 2017 as a method to minimise and manage short-term unauthorised encampments within the authority.

5.28 With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- » No specific cross-border issues were identified. At present, Medway Council is satisfied with the approach of neighbouring Local Planning Authorities in relation to how they are discharging their duties in relation to Gypsy, Traveller and Travelling Showmen accommodation.
- » In regard to cross-border joint-working ventures, Medway Council has participated in the Kent and Medway Local Planning Authority Gypsy and Traveller Working Group to manage the Local Plan evidence base.
- » It was believed that Medway and all neighbouring authorities are complying with the Duty to Cooperate.

Swale Borough Council

5.29 With regard to overall accommodation need in Swale, the views of the officer interviewed were as follows:

- » Since the last GTAA, Swale have carried out a 'call for sites' exercise to determine whether there might be the possibility of allocating sites. The Council have also reviewed their temporary and unauthorised sites and granted a degree of planning permission. Regarding Travelling Showmen, the Council have reviewed the existing unauthorised yard to consider whether it could be granted planning permission.
- » Swale currently have a need for 36 pitches to 2037/38 with 6 pitches in supply. Whilst a 5-year supply is not currently identified, Swale are confident that they can deliver the sites that are needed through windfall permissions.
- » Swale experience low levels of unauthorised encampments and no regular pattern is observed. The recent GTAA did not indicate a need for sizable transit provision in the area and agreed stopping places that were proposed to be adequate.

5.30 With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- » No specific cross-border issues were identified.
- » Swale Council are open to helping with the GTAA work of neighbouring authorities and have attended county wide meetings on the topic of GTAA work. For such reasons it was believed that Swale and its neighbouring authorities were all complying with the Duty to Cooperate.

Tonbridge and Malling Borough Council

5.31 With regard to overall accommodation need in Tonbridge and Malling, the views of the officer interviewed were as follows:

- » Since the last update of the GTAA (2018), the Council prepared and submitted a new Local Plan. However, in July 2021, the Council agreed to withdraw the Local Plan. This was in response to the government Planning Inspectors' findings. As a result, the Council have started to review and refresh the Plan.
 - » Three sites with temporary permissions were granted permanent planning permission during 2019.
 - » Tonbridge and Malling have identified a total of 108 Gypsy and Traveller households living in bricks and mortar in the area. The future housing needs of those families will be assessed as part of the settled community through the Strategic Housing Market Assessment (SHMA).
 - » Tonbridge and Malling commonly experience a number of unauthorised encampments each year. The maximum number of caravans reported was 20 in 2017 and 12 in 2016. After the 2018 GTAA identified a need for Transit provision in the area, Tonbridge and Malling made enquiries with other Kent Districts to see if there were any opportunities for a joint/sub-regional approach.

5.32 With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- » No specific issues were raised concerning how each neighbouring authority has been trying to meet its need. However, a recent example was discussed where a recent unauthorised encampment moved into the area from Maidstone Borough.
- » Tonbridge and Malling regularly engage in cross-border joint-working through the Kent Planning Policy Officer’s Forum, which has recently included general Gypsy & Traveller issues on its agendas. Tonbridge and Malling would also welcome discussions with Maidstone and other Kent Districts on the issue of transit provision.

Tunbridge Wells Borough Council

^{5.33} With regard to overall accommodation need in Tunbridge Wells, the views of the officer interviewed were as follows:

- » The last GTAA (2018) identified a need for 32 additional pitches. Since then the Council has granted planning consent for 4 additional pitches.
- » The GTAA recommended that the most appropriate way of meeting the need for additional pitches, which stems from the growth of existing families, should largely be through the intensification and/or expansion of existing sites. However, it cautioned that for some sites this may not be appropriate. The GTAA also advised that further capacity could also be met by granting full planning permission to occupiers residing on sites with temporary planning permission and also by reviewing appeal decisions.
- » Over the last five years, there has been an average of 6 unauthorised encampments each year. These are generally small encampments of short duration. It is understood that most unauthorised encampments have been due to specific family events (i.e. funerals and/or weddings). The 2018 GTAA did not identify a specific transit site need but suggested a ‘negotiated stopping places’ policy.

^{5.34} With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- » No specific cross-border issues with neighbouring authorities were identified.
- » With regard to cross-border joint-working ventures, preparation of the Tunbridge Wells 2018 GTAA included consultations with a range of stakeholders from neighbouring authorities. Gypsy and Traveller issues are similarly discussed on a regular basis through the Kent Planning Policy Officer’s Forum.
- » Gypsy and Traveller issues are a standing item on the regular Duty to Cooperate meetings that Tunbridge Wells officers hold with neighbouring local authorities. No awareness was identified of any parties not meeting the Duty to Cooperate.

Councillor and Parish Council Responses

^{5.35} To complement the Stakeholder Interviews and to enable early engagement with the settled community a link to a short online questionnaire was sent to all Borough Councillors and Parish Councils and a total of 21 online responses were received from 16 Parish Councils.

Figure 5 – Summary of Respondents

Parish Council	Position
Boughton Malherbe	Clerk
Boughton Monchelsea	Parish Clerk
Boxley	Parish Councillor
Bredhurst	Parish Clerk + Parish Councillor
Chart Sutton	Chair
Collier Street	Parish Councillor
East Sutton	Clerk
Headcorn	Parish Councillor + Chair + Vice Chair + Clerk
Hollingbourne	Parish Councillor
Linton	Parish Councillor
Marden	Parish Councillor
Sutton Valence	Clerk
Teston	Clerk
Ulcombe	Chairman + Clerk
Wormshill	Chair
Yalding	Clerk

^{5.36} The questionnaire included questions on the following broad subject areas:

- » Awareness of any Gypsy and Traveller sites
- » Any trends with regard to Gypsies and Travellers
- » What attracts Gypsies and Travellers to the area
- » Any kinds of seasonal fluctuations
- » Awareness of temporary stopping by travellers
- » Aware of any Travellers residing in bricks and mortar
- » Suitable land within parishes for Gypsy & Traveller pitches
- » Any other comments

^{5.37} A summary of views and responses that were submitted by Councillors and Parish Councils can be found below.

Awareness of any Gypsy and Traveller sites

- » Some Parish Councils do not regard the current site list for Maidstone as being correct. It was suggested that current site lists do not include many unofficial sites that are now considered tolerated sites. Some therefore believe the numbers are greater than those listed. Specific locations identified through their response that need updating include: Lenham Road; Love Lane; Bletchenden Road; Hammersteam; and Boarden.
- » One Parish Council also raised concern about the Martin's Garden site. Through a “bump” in the Headcorn and Ulcombe parish boundary, the site is said to be part

of Ulcombe. However, it was suggested that the site is much nearer to Headcorn High Street and that the resident's resort to Headcorn.

- » One Parish Council identified a site at Heath Road, Stilebridge Lane, to be added to the Council's list. It was also said that there is over a dozen pitches in Linton.
- » A Parish Council highlighted that the Petsfield site, Eastwood Road and stated that the exact number of pitches and residents there is unknown as the numbers are continually increasing. They have informed Maidstone Borough Council Planning Enforcement.
- » Two Parish Councils highlighted that they have more sites compared to other parishes in Maidstone, and that they have above the UK average of Gypsy and Traveller population.

Any trends with regard to Gypsies and Travellers

- » The most common trend experienced has been the increase in the number of privately-owned sites. This was said to include a mix of those with and without planning permission. Only one Parish Council stated that they have seen the loss of many sites in the area, over recent years. The loss was attributed to development in the area intended for residential and employment purposes.
- » Some parishes also suggested that they have observed an increase in the size of sites and the number of travellers in their areas.

What attracts Gypsies and Travellers to the area

- » Many parishes suggested that Travellers are attracted to Maidstone due to factors such as the already established Traveller community in the area, which is also connected to the historic, and current, availability of agricultural and civil engineering work opportunities.
- » Furthermore, the availability of suitable land, good transport links and locality to London were also identified as factors.
- » However, the most common reason identified concerned the assumed perception that the Travelling community have of Maidstone Borough Council, and its current Gypsy & Traveller policies. It was suggested that Travellers come to the area as Maidstone Borough Council are seen as being receptive to having more sites, and therefore readily accepting of applications and more likely to approve most. Furthermore, it was also suggested that costs associated with enforcement and appeal action prevent the council from upholding its countryside policies, which further encourages Travellers to settle in the area.

Any kinds of seasonal fluctuations

- » It was widely stated that there are no real fluctuations in Traveller movement and that the community are seen as permanent residents, as opposed to living a nomadic lifestyle.
- » However, some parishes reported that there is a reduction in the traveller population during the horse fair season.
- » Additionally, one parish also said that more unauthorised caravans are seen on existing and greenfield sites during Bank Holidays, although this view was not shared by other parishes.

Awareness of temporary stopping by Travellers

- » The only parishes to report instances of temporary stopping or encampments in their area were Boxley, Hollingbourne, Teston, and Yalding. These instances ranged from a few occasions per year where encampments stop for a number of nights while on their way to fairs and other events, to regular encampments at various locations within parishes.
- » Concern was raised regarding the potential disruption caused to settled communities near encampments, plus the monetary costs associated with cleaning sites following departure.

Aware of any Travellers residing in bricks and mortar

- » A number of reported being aware of Travellers in their area who live in bricks and mortar accommodation. Any additional details were passed on to Maidstone Borough Council.

Suitable land within parishes for Gypsy & Traveller pitches

- » Only one Parish put forward details of any land in the area which may be suitable for Gypsy and Traveller pitches. These details were passed on to Maidstone Borough Council.

Any other comments

- » Other comments received were broadly centred around three issues: 1) Divided community and tensions between Gypsies & Travellers and the settled community; 2) Expansion of the Gypsy & Traveller community; 3) Site quality, overcrowding and environmental damage. A summary of views can be found below:

Divided Community and Tensions between Gypsies & Travellers and the Settled Community

- » Parishes described a range of issues that are contributing to dividing communities and raising tensions between Gypsies & Travellers and the settled community.
- » There appears to be widespread resentment from some residents to what they feel is preferential treatment granted towards Gypsies & Travellers over the settled community. Examples include Gypsies & Travellers taking priority for school places; inequality in Gypsies & Travellers not having to comply with the same planning regulations as the settled community; the education and health needs of the settled community not being considered when they are applying for planning permission; and no consideration within planning regarding damage to the open countryside with the gradual increase and expansion of existing sites.
- » Another concern raised was the lack of consideration within planning to prevent concentrations of sites exceeding that of the settled community. Some parishes are worried that the density of the travelling community is such that it is beginning to dominate the settled community. It was hoped that concentrations would be considered more, as when the settled community are outnumbered it can often cause friction between Gypsies & Travellers and the settled community.
- » One Parish Council suggested that there should be more liaison between the Borough Council, Gypsies & Travellers, and the settled community to help when problems occur.

Expansion of the Gypsy & Traveller Community

- » Many parishes highlighted the increase in the number of sites in their area over recent years. One was of the view that Traveller sites should be spread over all the parishes in Maidstone. According to one, the PPTS 2015 clause citing ‘domination of the local community’ has to be seen in a broader context as opposed to simply looking at the physical distance of caravans from houses.
- » A Parish Council suggested that the larger the number of sites in a given area, the greater the difficulty in promoting integration and cohesion between the two communities.
- » One Parish Council want Maidstone Borough Council to form and publish a strategy for meeting the national requirements for provision of pitches for travellers so that any departures from it may stand some chance of enforcement action.

Site Quality, Overcrowding and Environmental Damage

- » One Parish Council suggested that Maidstone Borough is poorly served by public and affordable Gypsy & Traveller sites. It was stated that site quality and overcrowding issues at the public sites in the Borough highlight inadequacies in meeting the pitch need and proposed that “well located and properly equipped” public Gypsy and Traveller sites are “desperately” needed all across the Borough.

- » Parishes also advised that the constant expansion of Gypsy & Traveller sites is damaging the environment and the countryside.

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 and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community – although this was impacted by COVID-19 travel and social distancing restrictions.
- 6.2 Through the desk-based research and stakeholder interviews ORS identified 2 public sites; 148 private sites with permanent planning permission; 2 private sites with temporary planning permission; no sites that are tolerated for planning purposes; and 37 unauthorised sites. There are also 4 Travelling Showmen’s yards.
- 6.3 The table below sets out the number of pitches/plots, the number of interviews that were completed, and the reasons why interviews were not completed. It is important to note that for the purposes of this Report that it was not possible to make contact with households on 40 sites due to COVID-19 travel and social distancing restrictions.
- 6.4 It should be noted that there were 51 vacant or unimplemented pitches and 27 pitches that were not occupied by Gypsies or Travellers. This gives a statistically robust adjusted response rate of 78% for sites where it was possible to make contact with residents.
- 6.5 During the period between commencing the GTAA and reporting no further transient households were identified to interview other than those who were interviewed.

Figure 6 - Sites and yards visited in Maidstone

Site Status	Pitches/Plots	Interviews	Reasons for not completing interviews/Additional interviews
Public Sites			
Stilebridge Caravan Site	18	2	16 x no contact
Water Lane Caravan Site	14	8	4 x no contact, 2 x vacant
Private Sites			
1 Oak Lodge	3	3	-
2 Oak Lodge	3	3	-
3 Oak Lodge	2	2	-
Abbeywood Stud Farm	1	1	-
Adj 8 Green Lane Cottages	2	0	2 x pitch not visited
Allotment Gardens	1	0	1 x no contact
Apple Blossom	3	0	1 x no contact and 2 x vacant
Ash Gardens/Plot 2 The Meadows	1	1	-
Benover Paddock	2	2	-
Blossom Lodge, Maplehurst Lane	1	1	-
Blossom Lodge, Stockett Lane	4	0	4 x pitch not visited
Blue Bell Farm	2	2	-
Bramblewood	7	7	-

Bramblewood Stables	5	0	5 x no contact
Bridgefield	4	0	4 x pitch not visited
Broken Tree	1	1	-
Caravan 2, Hawthorne Farm	2	2	-
Chart Hill Paddock	5	5	-
Chart View, 1	1	1	-
Chart View, 2	1	1	-
Cherry Tree Farm	2	0	2 x no contact
Cobnut Tree Place (Plot 1)	1	0	1 x no contact
Delilah Lodge	1	1	-
Detling Lime Works	1	0	1 x no contact
Dunroamin	4	1	3 x pitches not developed
Emmett Hill Nursery	2	0	2 x no contact
Fairway	2	2	-
Faithfield	1	1	-
Five Oak Stables	1	0	1 x no contact
Forstal Farm	1	1	-
Four Oakes (Plot 2)	3	3	-
Glovers Bridge	2	0	2 x pitch not visited
Golden Oaks	1	1	-
Granada	3	1	2 x pitches not set out
Great Love Farm	2	0	2 x pitches not there
Greenacre (Plot 5)	1	1	-
Greenfields	2	0	2 x no contact
Hawthorn Farm	2	0	2 x no contact
Hieland Glen	1	1	-
Highlands Farm	2	2	-
Horseshoe Paddock	3	3	-
Kilnwood Farm	2	2	-
Kwana	1	1	-
Land Adjacent Amsbury Cottage	1	0	1 x pitch not visited
Land adjacent The Glen	2	0	2 x pitch not visited
Land Adjacent to Five Kilns	2	0	2 x under construction
Land at Hawthorn Place	2	2	-
Land at Stockbury Valley/Longton Manor	4	4	-
Land East of Queen Street	1	0	1 x pitch not visited
Land North of Stilebridge Stableyard	3	0	3 x pitch not visited
Land off Clapper Lane (Oakhurst Lodge)	1	0	1 x pitch not visited
Land Rear of Orchard Farm Nursery (Orchard Place)	2	0	2 x no contact
Land Rear of Vine Cottage	7	0	7 x non-Travellers
Land South East of Stilebridge Lane (The Barn)	2	0	2 x no contact
Land West of Longend Lane (Longend Meadow)	2	2	-
Land West of The Barn	1	0	1 x no contact
Little Acre, Chart Hill Road	2	0	2 x pitch not visited
Little Acre, Marden Road	2	0	2 x pitch not visited

Little Appleby	4	4	-
Little Boarden	3	3	-
Little Clock House	2	0	2 x no contact
Little Oak Farm	3	0	3 x pitch not visited
Little Paddocks	1	0	1 x no contact
Longton Manor	3	0	3 x not yet built
Lorne Greenacre	3	1	1 x vacant, 1 x pitch does not exist
Love Lane Stables	1	1	-
Maplehurst Paddock	1	1	-
Martins Gardens	6	0	6 x non-Travellers
Meadow View	3	0	3 x no contact
Millfield Farm	2	1	1 x pitch not developed
Mulberry Farm	5	5	-
Neverend Lodge	1	1	-
Oak Lodge	3	3	-
Oak Lodge (1)	2	2	-
Oak Tree Farm	7	0	7 x pitch not visited
Oak Tree Farm / The Pond	1	1	-
Oak Tree Place	1	1	-
Oakland Place	2	2	-
Oaklands	1	1	-
Oaklands	1	0	1 x non-Travellers
Old Oak Paddocks	1	1	-
Orchard Drive	1	1	-
Orchard Farm Nursery	1	1	-
Orchard Farm Nursery (Plot 1)	1	1	-
Orchard Farm Nursery Plot 1 (Orchard Spot)	2	2	-
Orchard Farm Nursery Plot 2	3	0	3 x no contact
Orchard Place	2	0	2 x under construction
Part Norham Farm	4	4	-
Peacock Farm	1	0	1 x pitch not visited
Pear Paddock	2	2	-
Peas Place	1	1	-
Perfect Place	4	4	-
Petsfield	2	3	-
Plot 1, The Meadows / 1 Smiths Cottage	2	2	-
Plot 2, The Meadows/Ash Gardens	3	3	-
Plum Tree Farm	2	0	2 x pitch not visited
Plum Tree Lane	18	1	17 x not visited
Primrose Paddock	2	0	2 x pitch not visited
Quarter Paddocks	5	6	-
Romany Stables (White House Farm)	2	2	-
Rosegarden	2	0	2 x under construction
Roydon Farm	5	1	4 x non-Travellers
Seaview Farm	8	5	3 x under construction

Silverlees	2	1	1 x vacant
Smiths View, Adjacent The Potters	1	1	-
Somersby Stables	3	0	3 x no contact
Stable Paddocks	4	0	4 x pitch not visited
Stilebridge Stableyard	1	1	-
Ten Acre Farm	1	0	1 x no contact
The Acorns	1	1	-
The Caravan / North Road Folly	1	0	1 x pitch not visited
The Chances	4	4	-
The Coppice	1	1	-
The Glen	6	0	6 x pitch not visited
The Green Barn	1	0	1 x no contact
The Honeysuckles	1	1	-
The Keys	1	1	-
The Lodge	1	1	-
The Mellows (and The Chestfields)	2	2	-
The Oakes	1	1	-
The Old Woodyard	1	0	1 x pitch not visited
The Orchard, Copper Lane	5	5	-
The Orchard/The Willows/The Finches (Stilebridge Paddock)	3	3	-
The Orchards, Snowey Lane	10	0	1 x refusal, 9 x non-Travellers
The Paddocks, George Street	2	2	-
The Paddocks, Love Lane	1	1	-
The Rosings (Behind The Ewes)	1	1	-
The Stables (Brookfield Gardens and The Finches)	6	6	-
The Stables, Frittenden Road	2	2	-
The Three Sons, Parkwood Lane	2	3	-
The Vine	5	5	-
The Willows, Stilebridge Lane	2	0	2 x pitch not visited
The Willows, Lucks Lane	1	1	-
Three Acres	2	2	-
Tommy's Maize / The Mount	4	4	-
Twin Oaks	3	0	3 x pitch not visited
Two Acres	1	1	-
Udene Barn Stud	4	0	4 x pitch not visited
Wheatgratten	7	7	-
Whiteacres	4	0	4 x pitch not visited
Willow Gardens	5	1	4 x no contact
Willow Trees	2	2	-
Willows End	3	1	2 x vacant
Wind in The Willows	1	0	1 x pitch not visited
Woodside Place	5	5	-
Woodside View (Land south of New Barn Farm)	2	2	-
Yelsted Farm	1	0	1 x pitch not visited
Yelton	2	0	2 x pitch not visited
Temporary Sites			
Rosewood Farm	2	2	-

The Three Sons, Hampstead Lane	2	7	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
Acers Place / Land Adjoining Greengates	2	2	-
Ash Tree Place	2	0	2 x no contact
Cherry Gardens	4	4	-
Chestfields	2	2	-
Eight Acres	1	0	1 x pitch not visited
Fairhaven	1	0	1 x pitch not visited
Flips Hole	2	2	-
Green Acres	8	8	-
Green Tops	1	1	-
Greengates	1	1	-
Hertsfield Farm	1	0	1 x pitch not visited
Horseshoes	1	0	1 x pitch not visited
Jack's Wood, (Land at Squirrel Wood)	1	1	-
Land Adj Forstal Farm	1	0	1 x pitch not visited
Land Adj Horseshoe Paddock	1	0	1 x pitch not visited
Land at Highlands Hill	1	0	1 x no contact
Land East of Blossom Lodge	7	0	7 x pitch not visited
Land East of Water Lane	2	2	-
Land Rear of Brickyard Cottages	3	2	1 x vacant
Land Rear of Little Neverend Farm	8	0	4 x no contact, 4 x under construction
Land Rear of Silverlees	8	0	8 x not built
Land Rear of The Meadows (Plots 1-10)	18	11	7 x no contact
Land South of Love Lane	1	0	1 x no contact
Little Appleby	2	2	-
Pear View	3	3	-
Plot 2, The Oakes	1	0	1 x pitch not visited
Plot 3 The Meadows (Vale End)	2	2	-
Plot 4 The Meadows	1	0	1 x pitch not visited
Plot A, Plum Tree Lane	1	0	1 x pitch not visited
Plot B, Plum Tree Lane	1	0	1 x pitch not visited
Plot C, Plum Tree Lane	3	0	3 x no contact
The Ash	2	2	-
The Ewes	1	1	-
The Green Barn	4	0	4 x no contact
The Paddocks, land west of Benover Road	1	0	1 x no contact
The Pottery	1	1	-
The Stables, Wagon Lane	1	0	1 x pitch not visited

Bricks and Mortar			
Various	8	8	-
Roadside			
Various	4	4	-
Travelling Showmen			
Fairview	6	6	-
Wickham Orchard	4	1	3 x no contact
Cobtree Meadows, Land Adjoining Greengates	2	0	2 x no contact
The Paddock	5	0	5 x non-Travellers
TOTAL	541	282	

Interviews with Gypsies and Travellers in Bricks and Mortar

- ^{6.6} Following all of the efforts that were made a total of 4 households living in bricks and mortar were interviewed and a further 4 were identified as being in need of a pitch through proxy interviews.

7. Current and Future Pitch Provision

Introduction

- 7.1 This section focuses on the pitch provision which is needed in the study area currently and to 2039/40. This includes both current unmet need and need which is likely to arise in the future⁹. 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. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 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 provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- 7.4 Nationally, a household formation and growth rate of 3.00% net per annum¹⁰ has been commonly assumed and widely used in local Gypsy and Traveller 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 pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix F**.
- 7.5 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 is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 7.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% 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.
- 7.7 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

⁹ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

¹⁰ Page 25, *Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007)* Now withdrawn.

Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showmen) and this has also been adjusted locally based on site demographics.

- 7.8 This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

- 7.9 Another more recent was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- 7.10 In addition, the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice in December 2017. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit.

- 7.11 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.

- 7.12 The household growth rate used for the assessment of future needs is informed by local evidence, and this demographic evidence is used to adjust the national growth rate of 1.50% up or down

based on the proportion of those aged under 18 (by planning status). In Maidstone, for households that met the planning definition 47% of residents were aged under 18. The national rate of 1.50% is based on 36% of residents aged under 18 so this has been adjusted to 1.95%. For households that did not meet the planning definition 36% of residents were aged under 18 so the national rate of 1.50% has been applied. The ORS national formation rate of 1.50% has been applied to undetermined households in the absence of any demographic data for these households.

- 7.13 Overall new household formation for those that met and did not meet the planning definition has also been adjusted to take account of teenagers in need of a pitch in the next 5 years who have already been identified as components of need. This eliminates any double counting in the assessment of need.
- 7.14 In addition, there were a large number of children and teenagers (72) identified through proxy interviews where it was not possible to determine their age. These have been apportioned to the population baseline based on the overall age profile for the children where it was possible to determine their age.

Breakdown by 5 Year Bands

- 7.15 In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time. There is also a split to provide need figures for the new Maidstone Local Plan period.

Applying the Planning Definition

- 7.16 As set out in Chapter 3, the outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition form the baseline of need in the GTAA. Need from undetermined households where an interview was not completed have been included as a potential additional component of need. Need from households that did not meet the planning definition has also been assessed to provide the Council with information on levels of need that – if not addressed through the Gypsy and Traveller DPD – will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 7.17 The table below sets out the planning status of households that were interviewed for the Maidstone GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults, in-migration and households living in bricks and mortar.

Figure 7 – Planning status of households in Maidstone

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined	Not Visited
Gypsies and Travellers				
Public Sites	0	13	22	0
Private Sites	207	15	57	70
Temporary	13	1	0	0
Tolerated	0	0	0	0
Unauthorised	52	9	20	18
Bricks and Mortar	7	1	0	0
Roadside	9	1	0	0
Sub-Total	288	40	99	88
Travelling Showmen				
Private Yards	6	1	5	0
Sub-Total	6	1	5	0
TOTAL	294	41	104	88

- 7.18 Figure 7 shows that for Gypsies and Travellers 288 households (88%), and for Travelling Showmen 6 households (86%) met the planning definition of a Traveller in that ORS were able to determine that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily.
- 7.19 A total of 40 Gypsy and Traveller households (12%) and 1 Travelling Showmen households (14%) did not meet the planning definition as they were not able to demonstrate that household members travel away from their usual place of residence for the purpose of work, or seeking work, or that they have ceased to travel temporarily due to children in education, ill health or old age.
- 7.20 It was not possible to make contact with households on 99 Gypsy and Traveller pitches on 53 sites and with households on 5 Travelling Showmen plots on 3 yards that were visited as they either refused to be interviewed or were not present during the extended fieldwork period.
- 7.21 It was also not possible to make contact with any households living on 88 Gypsy and Traveller pitches on 40 sites as a result of COVID-19 restrictions.

Interviews with Gypsies and Travellers in Bricks and Mortar

- 7.22 Following all of the efforts that were made it was possible to complete an interview or proxy interview with a total of 8 households living in bricks and mortar. A total of 7 met the planning definition and 1 did not, and all expressed a need to move to a site in Maidstone.

Migration/Roadside

- 7.23 The study has also sought to address 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 nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.

- 7.24 Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified a total of 9 households that have been displaced from Maidstone who are living on the roadside and who are seeking to move back to family sites. ORS have found no firm evidence from other local studies that have been completed recently of any additional households wishing to move to Maidstone. Therefore, apart from the identified in-migration, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- 7.25 It is important to note that any future demand for new sites or additional pitches as a result of in-migration should be seen as windfall need and should be dealt with by a criteria-based Local Plan Policy. This additional need should not be assessed against levels of need identified in the GTAA or to contribute towards supply to meet this need.

Pitch Needs – Gypsies and Travellers that meet the Planning Definition

- 7.26 The 408 households that met the planning definition were found on the private, temporary, and unauthorised sites, as well as from bricks and mortar and in-migration/roadside.
- 7.27 Analysis of the household interviews indicated that there is a current need for 46 pitches from concealed or doubled-up households or adults; 43 pitches from households on unauthorised sites; and 7 movement from bricks and mortar. The future need identified is for 71 pitches for teenage children living on site who are in need of a pitch of their own in the next 5 years; 3 pitches for households on sites with temporary planning permission; 9 pitches from in-migration or roadside; and 146 pitches as a result of new household formation, using a rate of 1.95% derived from the demographics of the residents. There is also supply from 2 vacant pitches on public sites. Therefore, the overall level of need identified for those households who met the planning definition of a Gypsy or Traveller is for **323 pitches** over the GTAA period.
- 7.28 Whilst there were 49 pitches on sites with permanent planning permission that were either vacant, unimplemented, or un-developed, these were all on private sites and are not considered to be available supply as required by the PPTS. However, it is anticipated that these pitches will meet some of the current and future need identified from these sites.
- 7.29 Many of the households that were interviewed on private sites in Maidstone also stated that they have sufficient land and a means to deliver additional pitches on their sites to meet the current and future needs for their families.

Figure 8 – Need for Gypsy and Traveller households in Maidstone that met the Planning Definition (2019-40)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	2
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	2
Current Need	
Households on unauthorised developments	43
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	46
Movement from bricks and mortar	7
Households on waiting lists for public sites	0
Total Current Need	96
Future Need	
5 year need from teenage children - Sites	71
Households on sites with temporary planning permission	3
In-migration	9
New household formation	146
<i>(Household base 365 and formation rate 1.95%)</i>	
Total Future Needs	229
Net Pitch Need = (Current and Future Need – Total Supply)	323

Figure 9 – Need for Gypsy and Traveller households in Maidstone that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	177	41	45	49	11	323

Pitch Needs – Undetermined/Not Visited Gypsies and Travellers

- 7.30 Whilst it was not possible to determine the planning status of a total of 99 households on sites that were able to be visited/contacted as they either refused to be interviewed or were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.
- 7.31 In addition, it was not possible to complete visits to 40 sites with a total of 88 pitches due to COVID-19 travel and social distancing restrictions. The needs of these households also need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.
- 7.32 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 7.33 However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 30% of households that have been interviewed meet the planning definition.
- 7.34 This would suggest that it is likely that only a proportion of the potential need identified from these undetermined households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 7.35 In addition, due to the high numbers of undetermined households at the time of preparing this GTAA Report, additional need from concealed or doubled-up households or single adults and need from teenagers who will need a pitch of their own in the next 5 years has been modelled based on the average numbers per household for the 255 households that were interviewed. This resulted in the following multipliers being applied. The modelled need is also included in the base for the calculation of new household formation:
- » Average number of concealed/doubled-up per household = 0.28.
 - » Average number of teenagers in need of a pitch of their own per household = 0.33
- 7.36 There were 99 occupied Gypsy and Traveller households on sites that were visited where it was not possible to complete an interview. **Need for up to 132 pitches** has been identified from these households. This is made up of 24 pitches on sites that are unauthorised; a modelled estimate of 28 pitches from concealed or doubled-up households or single adults; a modelled estimate of 33 pitches from teenagers in need of a pitch of their own in the next 5 years; and 47 pitches from new household formation using the ORS national formation rate of 1.50%¹¹. As set out in above, it is likely that only a proportion of these households will meet the planning definition. If the ORS

¹¹ The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

national average of 30% were to be applied the need identified from undetermined households could be for 40 pitches. If the locally derived proportion of households that met the planning definition (88%) were to be applied this could rise to 116 pitches.

- 7.37 There were 88 occupied Gypsy and Traveller households on sites that were not visited at the time of reporting due to COVID19. **Need for up to 113 pitches** has been identified from these households. This is made up of 18 pitches on sites that are unauthorised; a modelled estimate of 25 pitches from concealed or doubled-up households or single adults; a modelled estimate of 29 pitches from teenagers in need of a pitch of their own in the next 5 years; and 41 pitches from new household formation using the ORS national formation rate of 1.50%¹². As set out in above, it is likely that only a proportion of these households will meet the planning definition. If the ORS national average of 30% were to be applied the need identified from undetermined households could be for 34 pitches. If the locally derived proportion of households that met the planning definition (88%) were to be applied this could rise to 99 pitches.
- 7.38 Need from Undetermined and Not Visited households should be addressed through a Criteria-Based Local Plan Policy as set out in the Executive Summary, Chapter 3 and in the Conclusions to this report.
- 7.39 Tables setting out the components of need for undetermined households can be found in **Appendix B**.

Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition

- 7.40 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment has been completed to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies – as set out in the NPPF, or through a Gypsy and Traveller DPD. On this basis, it is evident that whilst the needs of the 40 households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.
- 7.41 Analysis of the household interviews indicated that there is a need from 6 concealed or doubled-up households or single adults; 8 from households on unauthorised sites; 1 movement from bricks and mortar; 5 from teenagers who will need a pitch of their own in the next 5 years; 1 household on a site with temporary planning permission; 1 from in-migration/roadside; and 14 from new household formation using a formation rate of 1.50% derived from the household demographics. Therefore, the overall level of need for those households who did not meet the planning definition of a Gypsy or Traveller is for **36 pitches** over the GTAA period. A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

¹²The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

Travelling Showmen Needs

Plot Needs – Travelling Showmen

- 7.42 There were 4 Travelling Showperson yards identified in Maidstone and interviews or proxy interviews were completed with the majority of households. One of the yards was not occupied by Travellers.
- 7.43 Analysis of the household interviews for households that met the planning definition indicated that there is a need for 2 plots for teenagers in need of a plot of their own in the next 5 years; and a need for 3 plots from new household formation derived from the household demographics. Therefore, the overall level of need for those households who met the planning definition of a Travelling Showperson is for **5 plots** over the GTAA period.

Figure 10 – Need for Travelling Showmen households in Maidstone that met the Planning Definition (2019-40)

Travelling Showmen - Meeting Planning Definition	Pitches
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Total Current Need	0
Future Need	
5 year need from teenage children	2
Households on yards with temporary planning permission	0
In-migration	0
New household formation	3
<i>(Formation from household demographics)</i>	
Total Future Needs	5
Net Plot Need = (Current and Future Need – Total Supply)	5

Figure 11 – Need for Travelling Showmen households in Maidstone that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	2	2	1	0	0	5

- 7.44 Need for **2 plots** was identified from the 5 undetermined households where it was not possible to complete and interview and this was all from new household formation, and there was no need identified from the 1 household that did not meet the planning definition of a Travelling Showperson.

Transit Requirements

- 7.45 When determining the potential need for transit provision the assessment has looked at data from the DLUHC Traveller Caravan Count, the outcomes of the stakeholder interviews and records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

DLUHC Traveller Caravan Count

- 7.46 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 7.47 Data from the Traveller Caravan Count has recorded no unauthorised caravans on sites not owned by Travellers since 2016.

Stakeholder Interviews and Local Data

- 7.48 The stakeholder interviews identified that short-term unauthorised encampments are infrequent in Maidstone, and that numbers have generally been reducing over recent years. This reduction has been attributed to a change in the enforcement approach to encampments and the use of Community Protection Notices. However, the majority of encampments were only said to stay for 24-hour periods and only stop in the area as they pass through; these are also commonly the same family units each year.
- 7.49 There are no public transit sites in Maidstone or in Kent, and there are ongoing transit provision discussions at a Kent-wide level.
- 7.50 Information held by the Council recorded a total of 9 encampments in 2016, 14 encampments in 2017, 9 encampments in 2018 and 9 encampments in 2019.
- 7.51 Further analysis has been undertaken where the number of caravans at each encampment have been recorded. This shows that the majority of encampments (59%) in Maidstone are made of 5 or less caravans and that only 13% of encampments are made up of 11 or more caravans. This is important when planning the type and size of transit provision that may be needed to address problems associated with unauthorised encampments.
- 7.52 There are a number of locations in Maidstone that appear to be popular with Travellers in recent years and these include Cumberland Green (6 encampments since 2016), Mote Park Leisure Centre (5), Gatland Lane Recreation Ground (4), Maidstone Leisure Centre (4) and Willington Street Park & Ride (4).

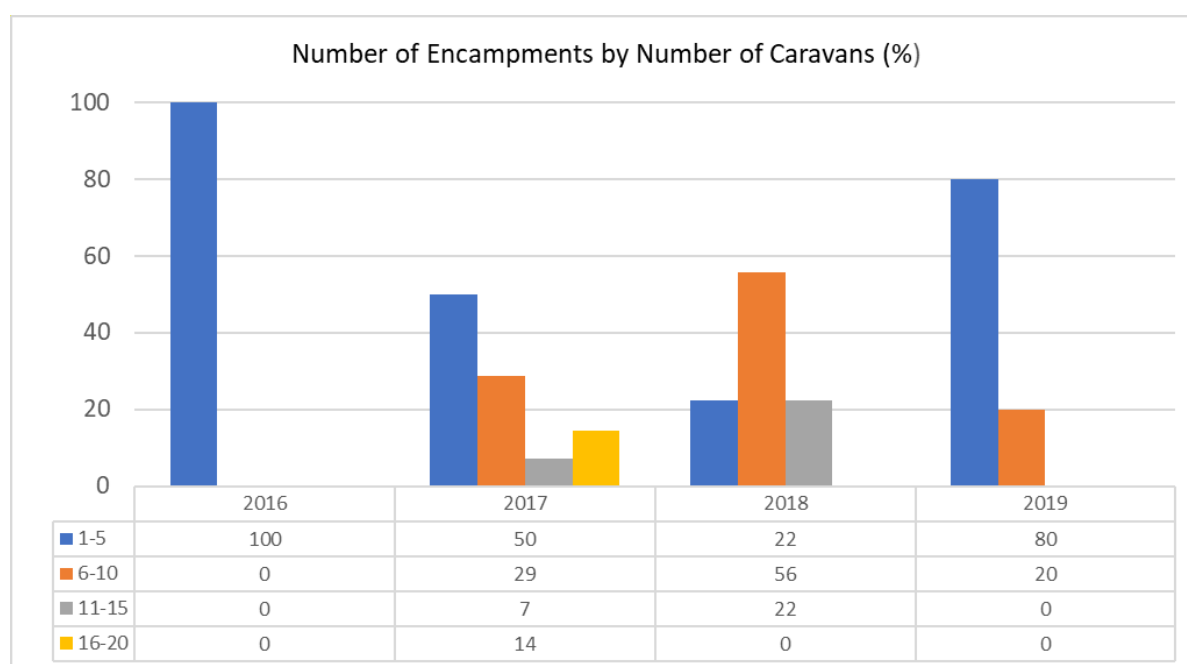
Figure 12 – Number of encampments by number of caravans

Year	1-5	6-10	11-15	16-20	Total
2016	9	0	0	0	9
2017	7	4	1	2	14
2018	2	5	2	0	9
2019	4	1	0	0	5
TOTAL	22	10	3	2	37

Figure 13 – Number of encampments by number of caravans (%)

Year	1-5	6-10	11-15	16-20	Total
2016	100	0	0	0	100
2017	50	29	7	14	100
2018	22	56	22	0	100
2019	80	20	0	0	100
TOTAL	59	27	8	5	100

Figure 14 – Number of encampments by number of caravans (%)



Potential Implications of PPTS (2015)

7.53 It has been suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case, but evidence from the Traveller Caravan Count does not currently suggest an increase in numbers of unauthorised non-tolerated is occurring. Any recommendations for future transit provision will need to make use of a robust local evidence base.

Transit Recommendations

7.54 Due to low historic low numbers of unauthorised encampments, it is not recommended that there is a need for a formal public transit site in Maidstone at this time. The situation relating to

levels of unauthorised encampments should continue to be monitored – for example a potential increase in the number of households travelling to seek to meet the current planning definition.

- 7.55 As well continuing to record information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 7.56 It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Kent-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 7.57 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- 7.58 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 7.59 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

8. Conclusions

8.1 This study provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showmen under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, the National Planning Policy Framework (NPPF) 2021 and the Planning Practice Guidance (PPG) 2021. It also provides the evidence base which can be used to support Local Plan Policies. Whilst the need evidenced at individual sites is not included in this report, additional evidence will be provided to the Council to enable them to allocate pitches and to investigate opportunities for the intensification or expansion of sites.

Gypsies and Travellers

8.2 In summary there is a need for:

- » 323 pitches in Maidstone over the Interim GTAA period to 2037 for Gypsy and Traveller households that met the planning definition.
- » 132 pitches for undetermined Gypsy and Traveller households that may meet the planning definition on sites that were visited.
- » 113 pitches for Gypsy and Traveller households who may meet the planning definition on sites that were not visited.
- » 36 pitches for Gypsy and Traveller households who did not meet the planning definition.

8.3 In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.

8.4 It is recommended that alternative approaches should be considered when seeking to address the levels of need identified in this Interim GTAA, especially when seeking to meet the need on existing private sites.

8.5 The Council should consider exploring opportunities to intensify or expand existing private sites in order for them to accommodate additional pitches or accommodation units. This approach could help to address levels of need for single concealed or doubled-up adults and from teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term it is unlikely that the accommodation need of these individuals will need to be met through traditional pitches as set out in Paragraph 8.3 above. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.

8.6 Future need from new household formation could also be met through natural turnover of pitches over time.

8.7 Given that many of the households that were interviewed on private sites in Maidstone stated that they have sufficient land and a means to deliver additional pitches to meet their current and

future needs, it is also recommended that the Council complete a Pitch Deliverability Assessment to identify the levels of need that can be met on existing sites in Maidstone with a view to trying to minimise the need to identify any new sites to meet current and future need.

- 8.8 Following the considerations set out above, it is recommended that need for households that met the PPTS planning definition is addressed through a combination of specific pitch allocations relating to the intensification or expansion of existing sites – considering some of the alternative approaches set out above.
- 8.9 It is recommended that need for households that meet the PPTS planning definition is addressed through new pitch allocations and the intensification or expansion of existing sites – considering some of the alternative approaches set out above. Given that the majority of identified need comes from households living on private sites it is likely that it will need to be addressed through the provision of private pitches or sites. As set out in Paragraph 8.1 the Council will be provided with additional information that will allow them to consider sites that are suitable for intensification or expansion.
- 8.10 The Council will need to carefully consider how to address any needs from undetermined households, from households seeking to move to Maidstone (in-migration), or from households currently living in bricks and mortar. In terms of Local Plan Policies, the Council should consider the use of a robust Criteria-Based Local Policy (as suggested in PPTS).
- 8.11 In general terms, it is the Government’s intention that the need for those households who do not fall within the PPTS planning definition should be met as part of general housing need, and through other Local Plan Housing Policies, this is reflected in the NPPF (2021).
- 8.12 It is recognised that the Council are in the process of reviewing their Local Plan that sets out how overall housing need will be addressed. It is also understood that the Council are in the process of preparing a separate Gypsy and Traveller DPD. The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showmen.

Travelling Showmen

- 8.13 The Interim GTAA identifies a need for 5 plots for households that met the planning definition and 2 plots for undermined households. There was no need identified for the household that did not meet the planning definition.

Transit Provision

- 8.14 Due to low historic low numbers of unauthorised encampments, and the existence of some private transit pitches, it is not recommended that there is a need for a formal public transit site in Maidstone at this time. However, there is a need for a more strategic approach to transit provision across Kent to consider the establishment of a network of emergency stopping places to enable the Police to use their powers to move household on.
- 8.15 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

Summary of Need to be Addressed

- 8.16 Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the table below sets out the likely number of pitches that will need to be addressed either as a result of the GTAA, or through the Councils Housing Need Assessment (HNA) process and through separate Local Plan Policies.
- 8.17 Total need from Gypsy and Traveller households that met the planning definition; from undetermined households that may meet the planning definition; and from households that did not meet the planning definition is for 604 pitches.
- 8.18 The tables below break total need down by:
- » The number that met the planning definition.
 - » The likely proportion of need from undetermined households that will meet the planning definition. It does this by taking 30% (the ORS national average of Gypsies and Travellers that meet the planning definition) of need from undetermined households and 88% (the locally derived proportion that met the planning definition).
 - » The number that did not meet the planning definition; and
 - » The likely proportion of need from undetermined households that will not meet the planning definition. It does this by taking 70% (the ORS national average of Gypsies and Travellers that do not meet the planning definition) of need from undetermined households and 12% (the locally derived proportion that did not meet the planning definition).
- 8.19 Need from households that meet or are likely to meet the planning definition will need to be addressed through Gypsy and Traveller Local Plan Policy through a combination of site allocations and through a Criteria-Based Policy.
- 8.20 Need for households that did not meet the planning definition will need to be met through other Local Plan Housing Policies.

Figure 15 – Need for Gypsy and Traveller households broken down by Local Plan Policy Type – ORS National %

Delivery Status	Gypsy & Traveller Policy	Housing Policy	TOTAL
Meet Planning Definition ¹³	323	-	323
30% Undetermined Need ¹⁴	40	-	40
30% Not Visited Need ¹⁵	34	-	34
Do Not Meet Planning Definition ¹⁶	-	36	36
70% Undetermined Need ¹⁷	-	92	92
70% Not Visited Need ¹⁸	-	79	79
TOTAL	397	207	604

Figure 16 – Need for Gypsy and Traveller households broken down by Local Plan Policy Type – Maidstone %

Delivery Status	Gypsy & Traveller Policy	Housing Policy	TOTAL
Meet Planning Definition ¹³	323	-	323
88% Undetermined Need ¹⁴	116	-	116
88% Not Visited Need ¹⁵	99	-	99
Do Not Meet Planning Definition ¹⁶	-	36	36
12% Undetermined Need ¹⁷	-	16	16
12% Not Visited Need ¹⁸	-	14	14
TOTAL	538	66	604

Reason for an Increase in Need in Maidstone

- 8.21 The previous GTAA for Maidstone that was published in 2012 identified a need for 187 pitches for Gypsies and Travellers for the period 2011-2026. This is significantly lower than the need figures that have been identified in this Interim GTAA which has identified a need for 604 Gypsy and Traveller pitches.
- 8.22 There are a number of reasons that can be identified as contributing towards this increased level of need in Maidstone when the Interim GTAA is compared to the 2012 GTAA:
- » **Higher site baseline:** In 2012 there were 115 sites and 233 pitches, and in 2021 there were 189 sites and 512 pitches.
 - » **Improved response rate:** In 2012 the response rate was 34%, and in 2021 the response rate was 78%.
 - » **Improved methodology:** The Interim GTAA employed a more robust methodology in relation to identifying need from concealed and doubled-up households, and when providing an estimate of future need from new household formation.

¹³ Through site allocations, intensification and expansion of existing sites where possible.

¹⁴ Through a Criteria-Based Local Plan Policy.

¹⁵ Through a Criteria-Based Local Plan Policy.

¹⁶ Through other Local Plan Housing Policies.

¹⁷ Through other Local Plan Housing Policies.

¹⁸ Through other Local Plan Housing Policies.

- » **Unauthorised sites:** In 2012 there were 31 unauthorised sites with 51 unauthorised pitches that were not included in the overall need figure. In 2021 there were 37 unauthorised sites with 101 unauthorised pitches that have been included in the overall need figure.
- » **Higher population baseline:** Given that a significantly higher number of household interviews were completed, the baseline for the estimate of new household formation is higher than in 2012.
- » **Longer GTAA period:** The 2012 GTAA covered a 15-year period, whilst the Interim GTAA covers an 18-year period.

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Appendix A: Glossary of Terms / Acronyms used

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 of households into 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 Showmen.
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 Showmen 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 Showmen 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 Showmen to refer to a site.

DLUHC	Department for Levelling Up, Housing and Communities.
GTAA	Gypsy and Traveller Accommodation Assessment
GTANA	Gypsy and Traveller Accommodation Needs Assessment
HEDNA	Housing and Economic Development Needs Assessment
HNA	Housing Need Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
ORS	Opinion Research Services
PPG	Planning Policy Guidance
PPTS	Planning Policy for Traveller Sites
SHMA	Strategic Housing Market Assessment
TSP	Travelling Showmen

Appendix B: Undetermined Households

Figure 17 - Need for undetermined Gypsy and Traveller households in Maidstone (2019-40)

Gypsies and Travellers – Undetermined	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	24
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	28
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	52
Future Need	
5 year need from teenage children	33
Households on sites with temporary planning permission	0
In-migration	0
New household formation	47
<i>(Household base 160 and formation rate 1.50%)</i>	
Total Future Needs	80
Net Pitch Need = (Current and Future Need – Total Supply)	132

Figure 18 – Need for undetermined Gypsy and Traveller households in Maidstone by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	85	14	14	15	4	132

Figure 19 - Need for Not Visited Gypsy and Traveller households in Maidstone (2019-40)

Gypsies and Travellers – Not Visited	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	18
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	25
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	43
Future Need	
5 year need from teenage children	29
Households on sites with temporary planning permission	0
In-migration	0
New household formation	41
<i>(Household base 142 and formation rate 1.50%)</i>	
Total Future Needs	70
Net Pitch Need = (Current and Future Need – Total Supply)	113

Figure 20 – Need for Not Visited Gypsy and Traveller households in Maidstone by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	72	12	13	13	3	113

Figure 21 - Need for undetermined Travelling Showmen households in Maidstone (2019-40)

Travelling Showmen - Undetermined	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public yards	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	2
<i>(Household base 5 and formation rate 1.50%)</i>	
Total Future Needs	2
Net Plot Need = (Current and Future Need – Total Supply)	2

Figure 22 – Need for undetermined Travelling Showmen households in Maidstone by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	0	1	0	1	0	2

Appendix C: Households that did not meet the Planning Definition

Figure 23 - Need for Gypsy and Traveller households in Maidstone that did not meet the Planning Definition (2019-40)

Gypsies and Travellers - Not Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	8
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	6
Movement from bricks and mortar	1
Households on waiting lists for public sites	0
Total Current Need	15
Future Need	
5 year need from teenage children	5
Households on sites with temporary planning permission	1
In-migration/Roadside	1
New household formation	14
<i>(Household base 45 and formation rate 1.50%)</i>	
Total Future Needs	21
Net Pitch Need = (Current and Future Need – Total Supply)	36

Figure 24 – Need for Gypsy and Traveller households in Maidstone that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	22	4	4	5	1	36

Figure 25 - Need for Travelling Showmen households in Maidstone that did not meet the planning definition (2019-40)

Travelling Showmen - Not Meeting Planning Definition	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public yards	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	0
<i>(No formation from 1 household)</i>	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 26 – Need for Travelling Showmen households in Maidstone that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	21	Total
	2019-24	2024-29	2029-34	2034-39	2039-40	
	0	0	0	0	0	0

Appendix D: Site and Yard List (July 2020)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public Sites		
Stilebridge Caravan Site	18	-
Water Lane Caravan Site	14	-
Private Sites with Permanent Permission		
1 Oak Lodge	3	-
2 Oak Lodge	3	-
3 Oak Lodge	2	-
Abbeywood Stud Farm	1	-
Adj 8 Green Lane Cottages	2	-
Allotment Gardens	1	-
Apple Blossom	3	-
Ash Gardens/Plot 2 The Meadows	1	-
Benover Paddock	2	-
Blossom Lodge, Maplehurst Lane	1	-
Blossom Lodge, Stockett Lane	4	-
Blue Bell Farm	2	-
Bramblewood	7	-
Bramblewood Stables	5	-
Bridgefield	4	-
Broken Tree	1	-
Caravan 2, Hawthorne Farm	2	-
Chart Hill Paddock	5	-
Chart View, 1	1	-
Chart View, 2	1	-
Cherry Tree Farm	2	-
Cobnut Tree Place (Plot 1)	1	-
Delilah Lodge	1	-
Detling Lime Works	1	-
Dunroamin	4	-
Emmett Hill Nursery	2	-
Fairway	2	-
Faithfield	1	-
Five Oak Stables	1	-
Forstal Farm	1	-
Four Oakes (Plot 2)	3	-
Glovers Bridge	2	-
Golden Oaks	1	-
Granada	3	-

Great Love Farm	2	-
Greenacre (Plot 5)	1	-
Greenfields	2	-
Hawthorn Farm	2	-
Hieland Glen	1	-
Highlands Farm	2	-
Horseshoe Paddock	3	-
Kilnwood Farm	2	-
Kwana	1	-
Land Adjacent Amsbury Cottage	1	-
Land adjacent The Glen	2	-
Land Adjacent to Five Kilns	2	-
Land at Hawthorn Place	2	-
Land at Stockbury Valley/Longton Manor	4	-
Land East of Queen Street	1	-
Land North of Stilebridge Stableyard	3	-
Land off Clapper Lane (Oakhurst Lodge)	1	-
Land Rear of Orchard Farm Nursery (Orchard Place)	2	-
Land Rear of Vine Cottage	7	-
Land South East of Stilebridge Lane (The Barn)	2	-
Land West of Longend Lane (Longend Meadow)	2	-
Land West of The Barn	1	-
Little Acre, Chart Hill Road	2	-
Little Acre, Marden Road	2	-
Little Appleby	4	-
Little Boarden	3	-
Little Clock House	2	-
Little Oak Farm	3	-
Little Paddocks	1	-
Longton Manor	3	-
Lorne Greenacre	3	-
Love Lane Stables	1	-
Maplehurst Paddock	1	-
Martins Gardens	6	-
Meadow View	3	-
Millfield Farm	2	-
Mulberry Farm	5	-
Neverend Lodge	1	-
Oak Lodge	3	-
Oak Lodge (1)	2	-
Oak Tree Farm	7	-
Oak Tree Farm / The Pond	1	-
Oak Tree Place	1	-
Oakland Place	2	-
Oaklands	1	-
Oaklands	1	-
Old Oak Paddocks	1	-
Orchard Drive	1	-
Orchard Farm Nursery	1	-
Orchard Farm Nursery (Plot 1)	1	-
Orchard Farm Nursery Plot 1 (Orchard Spot)	2	-

Orchard Farm Nursery Plot 2	3	-
Orchard Place	2	-
Part Norham Farm	4	-
Peacock Farm	1	-
Pear Paddock	2	-
Peas Place	1	-
Perfect Place	4	-
Petsfield	2	-
Plot 1, The Meadows / 1 Smiths Cottage	2	-
Plot 2, The Meadows/Ash Gardens	3	-
Plum Tree Farm	2	-
Plum Tree Lane	18	-
Primrose Paddock	2	-
Quarter Paddocks	5	-
Romany Stables (White House Farm)	2	-
Rosegarden	2	-
Roydon Farm	5	-
Seaview Farm	8	-
Silverlees	2	-
Smiths View, Adjacent The Potters	1	-
Somersby Stables	3	-
Stable Paddocks	4	-
Stilebridge Stableyard	1	-
Ten Acre Farm	1	-
The Acorns	1	-
The Caravan / North Road Folly	1	-
The Chances	4	-
The Coppice	1	-
The Glen	6	-
The Green Barn	1	-
The Honeysuckles	1	-
The Keys	1	-
The Lodge	1	-
The Mellows (and The Chestfields)	2	-
The Oakes	1	-
The Old Woodyard	1	-
The Orchard, Copper Lane	5	-
The Orchard/The Willows/The Finches (Stilebridge Paddock)	3	-
The Orchards, Snowey Lane	10	-
The Paddocks, George Street	2	-
The Paddocks, Love Lane	1	-
The Rosings (Behind The Ewes)	1	-
The Stables (Brookfield Gardens and The Finches)	6	-
The Stables, Frittenden Road	2	-
The Three Sons, Parkwood Lane	2	-
The Vine	5	-
The Willows, Stilebridge Lane	2	-
The Willows, Lucks Lane	1	-
Three Acres	2	-

Tommy's Maize / The Mount	4	-
Twin Oaks	3	-
Two Acres	1	-
Udene Barn Stud	4	-
Wheatgratten	7	-
Whiteacres	4	-
Willow Gardens	5	-
Willow Trees	2	-
Willows End	3	-
Wind in The Willows	1	-
Woodside Place	5	-
Woodside View (Land south of New Barn Farm)	2	-
Yelsted Farm	1	-
Yelton	2	-
Private Sites with Temporary Planning Permission		
Rosewood Farm	2	-
The Three Sons, Hampstead Lane	2	-
Tolerated Sites		
None	-	-
Unauthorised Sites		
Acers Place / Land Adjoining Greengates	-	2
Ash Tree Place	-	2
Cherry Gardens	-	4
Chestfields	-	2
Eight Acres	-	1
Fairhaven	-	1
Flips Hole	-	2
Green Acres	-	8
Green Tops	-	1
Greengates	-	1
Hertsfield Farm	-	1
Horseshoes	-	1
Jack's Wood, (Land at Squirrel Wood)	-	1
Land Adj Forstal Farm	-	1
Land Adj Horseshoe Paddock	-	1
Land at Highlands Hill	-	1
Land East of Blossom Lodge	-	7
Land East of Water Lane	-	2
Land Rear of Brickyard Cottages	-	3
Land Rear of Little Neverend Farm	-	8
Land Rear of Silverlees	-	8
Land Rear of The Meadows (Plots 1-10)	-	18
Land South of Love Lane	-	1
Little Appleby	-	2
Pear View	-	3
Plot 2, The Oakes	-	1
Plot 3 The Meadows (Vale End)	-	2
Plot 4 The Meadows	-	1
Plot A, Plum Tree Lane	-	1

Plot B, Plum Tree Lane	-	1
Plot C, Plum Tree Lane	-	3
The Ash	-	2
The Ewes	-	1
The Green Barn	-	4
The Paddocks, land west of Benover Road	-	1
The Pottery	-	1
The Stables, Wagon Lane	-	1
TOTAL PITCHES	411	101
Travelling Showmen Yards		
Fairview	6	-
Wickham Orchard	4	-
Cobtree Meadows, Land Adjoining Greengates	2	-
The Paddock	5	-
TOTAL PLOTS	17	0

Appendix E: Household Interview Questions

GTAA Questionnaire 2019



INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

A General Information

A1	Name of planning authority: <i>INTERVIEWER please write in</i>								
A2	Date/time of site visit(s): <i>INTERVIEWER please write in</i>	DD/MM/YY	TIME						
A3	Name of interviewer: <i>INTERVIEWER please write in</i>								
A4	Address and pitch number: <i>INTERVIEWER please write in</i>								
A5	Type of accommodation: <i>INTERVIEWER please cross one box only</i>	Council <input type="checkbox"/>	Private rented <input type="checkbox"/>	Private owned <input type="checkbox"/>	Unauthorised <input type="checkbox"/>	Bricks and Mortar <input type="checkbox"/>			
A6	Name of Family: <i>INTERVIEWER please write in</i>								
A7	Ethnicity of Family: <i>INTERVIEWER please cross one box only</i>	Romany Gypsy <input type="checkbox"/>	Irish Traveller <input type="checkbox"/>	Scots Gypsy or Traveller <input type="checkbox"/>	Show Person <input type="checkbox"/>	New Traveller <input type="checkbox"/>	English Traveller <input type="checkbox"/>	Welsh Gypsy <input type="checkbox"/>	Non-Traveller <input type="checkbox"/>
	Other <i>(please specify)</i>								
A8	Number of units on the pitch: <i>INTERVIEWER please write in</i>	Mobile homes	Touring Caravans	Day Rooms	Other <i>(please specify)</i>				

A9 Is this site your main place of residence? If not where is it?
INTERVIEWER: Please cross one box only

Yes No

A10 How long have you lived here? If you have moved in the past 5 years, where did you move from? *INTERVIEWER: Please write in below*

Years	Months	If you have moved in the past 5 years, where did you move from? Include ALL moves
-------	--------	---

A11 Did you live here out of your own choice or because there was no other option? If there was no other option, why? *INTERVIEWER: Please cross one box only*

Choice No option

A12 Is this site suitable for your household? If so why and if not why not? (For example close to schools, work, healthcare, family and friends etc.)
INTERVIEWER: Please cross one box only

Yes No

A13 How many separate families or unmarried adults live on this pitch?
INTERVIEWER: Please cross one box only

1 2 3 4 5 6 7 8 9 10

B Demographics

B1 Demographics — Household 1 *INTERVIEWER: Please write-in*

Person 1		Person 2		Person 3	
Sex	Age	Sex	Age	Sex	Age

Complete additional forms for each household on pitch *INTERVIEWER: Please write-in*

Person 4		Person 5		Person 6		Person 7		Person 8	
Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age

C Accommodation Needs

C1 How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years? *INTERVIEWER: Please cross one box only*

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1 2 3 4 5 6 7 8 9 10

Other Please specify

C2 How many of your children will need a home of their own in the next 5 years? If they live here now, will they want to stay on this site? If not, where would they wish to move? (e.g. other site, in bricks and mortar etc.) If they do not live on this site, where do they currently live and would they want to move on to this site or another local site if they could get a pitch? *INTERVIEWER: Please cross one box only*

1 2 3 4 5 6 7 8 9 10

Other *Please specify*

Details (Please specify)

D **Waiting List**

D1 Is anyone living here on the waiting list for a pitch in this area? *INTERVIEWER: Please cross one box only*

Yes —————> Continue to D2
 No —————> Go to D4

D2 How many people living here are on the waiting list for a pitch in this area? *INTERVIEWER: Please cross one box only*

1 2 3 4 5 6 7 8 9 10

Other *(Please specify)*

Details (Please specify)

D3 How long have they been on the waiting list? *INTERVIEWER: Please cross one box only*

0-3 months 3-6 months 6-12 months 1-2 years 2+ years

Other *(Please specify)*

Details (Please specify)

D4 If they are not on the waiting list, do any of the people living here want to be on the waiting list? (*INTERVIEWER* if they do - please take their contact details) *INTERVIEWER: Please cross one box only*

1 2 3 4 5 6 7 8 9 10

No Other *(Please specify)*

Details (Please specify) and take contact details)

E		Future Accommodation Needs				
E1	Do you plan to move from this site in the next 5 years? If so, why?					
	<i>INTERVIEWER: Please cross one box only</i>					
	Yes <input type="checkbox"/> <i>If yes</i> → <i>Continue to E2</i>	If so, why? (please specify)				
	No <input type="checkbox"/> <i>If no</i> → <i>Go to E5</i>					
E2	Where would you move to?	<i>INTERVIEWER: Please cross one box only</i>				
	Another site in this area <i>(specify where)</i>	A site in another council area <i>(specify where)</i>	Bricks and mortar in this area <i>(specify where)</i>	Bricks and mortar in another council area <i>(specify where)</i>	Other (e.g. land they own elsewhere) <i>(Please specify)</i>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Please specify where they would move to If they own land elsewhere - probe for details					
E3	If you want to move would you prefer to buy a private pitch or site, or rent a pitch on a public or private site?	<i>INTERVIEWER: Please cross one box only</i>				
	Private buy	Private rent	Public rent			
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
E4	Can you afford to buy a private pitch or site?	<i>INTERVIEWER: Please cross one box only</i>				
	Yes	No				
	<input type="checkbox"/>	<input type="checkbox"/>				
E5	Are you aware of, or do you own any land that could have potential for new pitches?	<i>INTERVIEWER: Please cross one box only</i>				
	Yes	No				
	<input type="checkbox"/>	<input type="checkbox"/>				
	Please ask for details on where land/site is located and who owns the land/site?					

F Travelling	
F1	<p>How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5+ </p> <p style="text-align: center;"> ↓ Go to F6a } Continue to F2 </p>
F2	<p>If you or members of your family have travelled in the last 12 months, which family members travelled? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> All the family Adult males Other If other, please specify </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p>
F3	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <p style="text-align: center;"> Work Holidays Visiting family Fairs Other </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> Details / specify if necessary. If fairs—probe for whether this involves work </p>
F4	<p>At what time of year do you or family members usually travel? And for how long? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> All year Summer Winter </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> And for how long? </p>
F5	<p>Where do you or family members usually stay when they are travelling? <i>INTERVIEWER: Please cross all boxes that apply</i></p> <p style="text-align: center;"> LA transit sites Private transit sites Roadside Friends/family Other </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> If other, please specify </p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> INTERVIEWER: Ask F6a — F8 <u>ONLY</u> if F1 = 0. Otherwise, go to F9 </p>
F6a	<p>Are there any reasons why you don't you travel at the moment?</p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> Details </p>
F6b	<p>Have you or family members ever travelled? <i>INTERVIEWER: Please cross one box only</i></p> <p style="text-align: center;"> Yes <input type="checkbox"/> —————> Continue to F7 No <input type="checkbox"/> —————> Go to F9 </p>
F7a	<p>When did you or family members last travel? <i>INTERVIEWER: Please write in</i></p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> Details </p>
F7b	<p>What were the reasons for travelling? <i>INTERVIEWER: Please cross all that apply</i></p> <p style="text-align: center;"> Work Holidays Visiting family Fairs Other </p> <p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </p> <p style="border: 1px solid black; padding: 2px; text-align: center;"> Details / specify if necessary. If fairs—probe for whether this involves work </p>

F8 Why do you not travel anymore? INTERVIEWER: Cross all boxes that apply & probe for details

- | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Children
in school | Ill health | Old age | Settled now | Nowhere
to stop | No work
opportunities | Other |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If other, please specify

Details about children in school, types of ill health, or looking after relative with poor health, and specific problems/issues relating to old age

F9 Do you or other family members plan to travel in the future?

INTERVIEWER: Please cross one box only

- | | | | |
|------------|--------------------------|--------|-----------------|
| Yes | <input type="checkbox"/> | —————> | Continue to F10 |
| No | <input type="checkbox"/> | —————> | Go to G1 |
| Don't know | <input type="checkbox"/> | —————> | Go to G1 |

F10 When, and for what purpose do you/they plan to travel?

Details

F11 Is there anything else you would like to tell us about your travelling patterns?

Details

G Any other information	
G1	Any other information about this site or your accommodation needs? <i>INTERVIEWER: Please write in</i>
	<p>Details (e.g. can current and future needs be met by expanding or intensifying the existing site?)</p>
G2	Site/Pitch plan? Any concerns? <i>INTERVIEWER: Please sketch & write in</i>
	<p>Sketch of Site/Pitch — any concerns?</p> <p>Are any adaptations needed?</p> <p>Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently</p>

H Bricks & Mortar Contacts	
H1	Contacts for Bricks and Mortar interviews? <i>INTERVIEWER: Please write in</i>
Details	
Council contact?	
<p>Would you like the council to contact you about any of the issues raised in this interview? Please note that although ORS will pass on your contact details to the Council we cannot guarantee when they will contact you?</p> <p><i>INTERVIEWER: Please cross one box only</i></p>	
Yes	No
<input type="checkbox"/>	<input type="checkbox"/>
<p>INTERVIEWER: Can I confirm your name and telephone number so that we can pass them on to the Council for this purpose only. Your details will only be used for this purpose and will not be passed onto anyone else.</p>	
Respondent's Name.....	<input type="text"/>
Respondent's Telephone.....	<input type="text"/>
Respondent's Email.....	<input type="text"/>
Interview log	
<p><i>INTERVIEWER: Please record the date and time that the interview was carried out</i></p>	
Date.....	<input type="text"/>
Time of interview.....	<input type="text"/>

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Appendix F: Technical Note on Household Formation and Growth Rates



Technical Note

Gypsy and Traveller Household Formation and Growth Rates

June 2020

Opinion Research Services



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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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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 until 2013 little detailed work had been done to assess their likely scale. ORS undertook work in 2013 to assess the likely rate of demographic growth for the Gypsy and Traveller population and concluded that the figure could be as low 1.25% per annum, but that best available evidence supports a national net household growth rate of 1.50% per annum.
2. This analysis was produced as a separate document in 2013 and then updated in 2015 (www.opinionresearch.co.uk/formation2015) in light of comments from academics, planning agents and local authorities. The 2015 document was complex because there was still serious dispute as to the level of demographic growth for Gypsies and Travellers in 2015. However, ORS now consider these disputes have largely been resolved at Planning Appeals and Local Plan Examinations, so we consider that much of the supporting evidence is now no longer required to be in the document.
3. This current document represents a shortened re-statement to our findings in 2015 to allow for easier comprehension of the issues involved. It contains no new research and if reader wishes to see further details of the supporting information, they should review the more detailed 2015 report.

Introduction

4. 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.

Modelling Population and Household Growth Rates

5. 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, in-/out-migration and household dissolution. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context in 2013, ORS 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 supplemented the available national statistical sources with data derived from our own surveys.

Migration Effects

6. 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.

Population Profile

7. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. 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.

Table 1 - 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

8. 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.
9. 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. We know of only one estimate of fertility rates of the UK Gypsy and Traveller community, in *'Ethnic identity and inequalities in*

Britain: The dynamics of diversity by Dr Stephen Jivraj and Professor Ludi Simpson (published May 2015). The authors use the 2011 Census data to estimate the TFR for the Gypsy and Traveller community as 2.75.

10. ORS used our own multiple survey data to investigate the fertility rates of Gypsy and Traveller women. 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). On this basis it is reasonable to infer an average of 3 children per woman during her lifetime, which is broadly consistent with the estimate of 2.75 children per woman derived from the 2011 Census.

Death Rates

11. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account. 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).
12. Therefore, in our population growth modelling we 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).

Modelling Outputs

13. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling, undertaken in PopGroup, projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum. If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.50% per annum. To generate an 'upper range' rate of population growth, we assumed an implausible 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 1.90% per annum.

Household Growth

14. 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.
15. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.25%-1.50% 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.
16. 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 3.60% of household representatives are aged 16-24, compared with 8.70% in the Gypsy and Traveller population. ORS's survey data shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 2 - Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	Number of households - England	Percentage households - England	Number of households – Gypsy and Traveller	Percentage households – Gypsy and Traveller
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%

17. 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

Table 3 - Household Type (Source: UK Census of Population 2011)

Household Type	Number of households - England	Percentage households - England	Number of households – Gypsy and Traveller	Percentage households – Gypsy and Traveller
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%

18. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents with dependent children, 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 1.25%-1.50% per annum Gypsy and Traveller population growth rate is likely to lead to a household growth rate of 1.25%-1.50% per annum

Summary Conclusions

19. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.50% per annum. Some local authorities might allow for a household growth rate of up to 2.50% 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, lower estimates should be used.

20. The outcomes of this Technical Note can be used to provide an estimate of local new household formation rates by adjusting the upper national growth rate of 1.50% based on local demographic characteristics.
21. In addition, in certain circumstances where the numbers of households and children are higher or lower than national data has identified, or the population age structure is skewed by certain age groups, it may not be appropriate to apply a percentage rate for new household formation. In these cases, a judgement should be made on likely new household formation based on the age and gender of the children identified in local household interviews. This should be based on the assumption that 50% of households likely to form will stay in any given area and that 50% will pair up and move to another area, while still considering the impact of dissolution. This is based on evidence from over 140 GTAAAs that ORS have completed across England and Wales involving over 4,300 household interviews.