A Gypsy and Traveller Accommodation Assessment

For

The South Housing Market Area

Of the West Midlands Region

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On behalf of

The South Housing Market Partnership

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1. Introduction

1.1 Aims and Objectives

- 1.1.1 The purpose of this Assessment is to provide information on the accommodation needs of Gypsies and Travellers for sub-regional and district level planning policy to set the appropriate number, type and distribution of additional pitches to be provided.
- 1.1.2 The West Midlands Regional Planning Body is required to provide a strategic view of Gypsy and Traveller needs across the region, and to provide pitch numbers at District level for inclusion in the revised Regional Spatial Strategy and in the emerging Local Development Framework.
- 1.1.3 The Assessment was commissioned by the South Housing Market Area Partnership, as an extension of the sub-regional Housing Market Assessment which was completed earlier in the year, to meet the requirements of the Department for Communities and Local Government for each Housing Authority to undertake a Gypsy and Traveller Accommodation Assessment in accordance with the 2004 Housing Act, Planning Circular 1/2006, and the accompanying Good Practice Guidance.

1.1.4 The objective of the Assessment is to:

Establish the current numbers, cultural background, location, tenure and family composition of the existing Gypsy and Traveller population.

Estimate their unmet accommodation housing needs, both immediate and over a 5 year timescale, in terms of additional number of pitches required for each category and location of site.

Identify, where possible, aspirations and perceptions, in relation to alternative types of site, the range and quality of facilities, access to services and questions of security, harassment, health and disability.

1.1.5 The management of the Assessment:

The project partners are the eight district councils and two county councils within the South Housing Market Area:

Bromsgrove District Council Malvern Hills District Council Redditch Borough Council Stratford-on-Avon District Council Warwick District Council
Worcester City Council
Wychavon District Council
Wyre Forest District Council
Warwickshire County Council
Worcestershire County Council

Project management was provided by a Project Management Team established by the South Housing Market Area Partnership, which was advised by a Gypsy & Traveller Group comprising representatives from the housing, planning and environmental health departments of all eight district authorities, as well as representatives from the Gypsy Services from both county councils, and representatives of the West Midlands Consortium Education Service for Travelling Children

Interview-based Research for the project was carried out by the county council and education service staff, and the results were collated by the Worcestershire County Council Research and Intelligence Unit.

Consultation on the Draft Report included all members of the South Housing Market Area Partnership, and the two police authorities for that area. (See Appendix 3).

1.2 The Study Area

- 1.2.1 The West Midlands Regional Housing Strategy (RHS) and Regional Spatial Strategy (RSS) have defined 4 sub-regional housing markets for the purpose of establishing the basis for joint working between districts across which there are some broadly similar market characteristics.
- 1.2.2 The South Housing Market Area comprises the 6 districts of Worcestershire and the 2 districts of South Warwickshire (Stratford-on-Avon and Warwick). The market characteristics which have established the 4 sub-regional Housing Market Areas relate specifically to traditional bricks and mortar housing rather than the Gypsy and Traveller population. Nevertheless they provide an established framework for carrying out the Assessments so they can be aggregated to a regional level, and disaggregated to a district level, with a reasonable degree of consistency as to methodology and timing.
- 1.2.3 The Government's bi-annual caravan count in July 2007 showed that Worcestershire had a far higher number of Gypsies and Travellers than any other county in the region, with 445 caravans compared with around 240 in Warwickshire, 210 in Staffordshire, 200 in Shropshire and 170 in Herefordshire. Neighbouring counties in other regions also have high numbers (around 400 in Gloucestershire and 320 in Oxfordshire). Worcestershire's number has risen by 26% in the last 2 years, which is well above average, with all of the other counties

- quoted having fairly stable numbers, apart from Herefordshire which has seen a 44% increase over 2 years.
- 1,2,4 Worcestershire also has by far the highest proportion of local authority provision, catering for over half the caravans identified in the caravan counts, compared with a third or less in other counties.
- 1.2.4 The common characteristic of all counties in the region is the rapid increase in caravan numbers an increase of over 15% in the last two years for the region as a whole while the level of local authority provision has remained static.
- 1.2.5 Another key characteristic, which applies particularly to the South Housing Market Area, is the reduction in the extent to which travelling is in pursuit of employment. There has been a substantial reduction in the proportion of the Gypsy and Traveller population that is engaged in seasonal work that requires them to move between different areas at different times of year.
- 1.2.6 This reduction has been to some extent accommodated by the development of the large number of both local authority and private residential sites, and the loss of many of the traditional stopping places. This has in turn led to a predominantly settled Gypsy population, leaving the smaller number of Irish Travellers, as well as those Gypsy families unable to secure a permanent pitch, with no alternative to Unauthorised Encampments.
- 1.2.7 For Travelling Showpeople, there has been less of a reduction in travelling for employment. Sites are pre-arranged when they are away from their base, so unauthorised encampments do not occur. There has been a trend for longer periods away from base, and a steady increase in the population through new household formation.

1.3 The Strategic and Policy Context

1.3.1 Regional Spatial Strategy, Phase 2 Revision – preferred option CF9 states that:

"Development plans should ensure that adequate provision is made for suitable sites to accommodate gypsies and travellers. Such provision should reflect the order of demand in the area as indicated by the trends shown by the ODPM annual count and any additional information."

1.3.2 **ODPM Circular 01/2006** requires the review of this policy to:

"Identify the number of pitches required (but not their location) for each local planning authority in the light of the Gypsy and Traveller Accommodation Assessments and a strategic review of needs across the region." 1.3.3 The Circular also requires local authorities to use their Development Plan Documents to allocate sites to meet these pitch requirements:

"The number of pitches set out in the Regional Spatial Strategy must be translated into specific site allocations in one of the local planning authority's Development Plan Documents that form part of the Local Development Framework.

The core strategy should set out the criteria for the location of gypsy and traveller sites which will be used to guide the allocation of sites in the relevant Development Plan Document....

Local authorities must allocate sufficient sites for gypsies and travellers, in terms of the number of pitches required by the Regional Spatial Strategy, in site allocation Development Plan Documents."

- 1.3.4 **Government Circular 04/2007** indicates that the needs of Travelling Showpeople are to be treated in a similar way to those of Gypsies and Travellers as set out in Circular 01/2006, and included in Gypsy and Traveller Accommodation Assessments.
- 1,3,5 This Assessment is therefore the basis on which the Regional Spatial Strategy, and then the Local Development Document, will identify specific sites for meeting the accommodation needs of Gypsies and Travellers, including Showpeople. It must be recognised that the Assessment process, and the allocation of sites in this way, are entirely new and untested, and have not yet been subject to scrutiny or to periodic review. It will therefore be vital that the database, and the working relationships established by the Assessment are maintained and updated so as to respond to changes and refine the detail of the recommendations.

1.4 Definitions

1.4.1 **Gypsies and Travellers** are defined in Government Guidance (Circular 01/2006) as:

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

- 1.4.2 **Travelling Showpeople** are defined in more recent Government Guidance (Circular 04/2007) as:
 - "Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined in ODPM Circular 01/2006.
- 1.4.3 This second Government Circular makes it clear that the accommodation needs of the two groups should be considered at the same time and in the same way, while acknowledging that the requirements of each group are quite distinct in particular the need for larger pitches for Showpeople to accommodate the much larger vehicles and other equipment which form an essential part of their business. References in this Assessment to the overall number of Gypsies and Travellers, and total pitch requirements can therefore be taken as including Showpeople, although the needs of each group have been separately identified in the detail.
- 1.4.4 Pitches are the spaces which are occupied by a single family, and will usually accommodate more than one residential caravan or mobile home. Although the Government requires local authorities to provide a twice yearly count of the number of caravans, this does not equate to the number of pitches. On Local Authority sites, there will normally be room for 2 residential caravans on each allocated pitch, but on private sites, particularly on those that are unauthorised, the distinction between pitches and caravans will be far less clear. This Assessment has sought to identify the number of families, and where extended families live on the same site, a single family has been taken as being the occupiers of one pitch or its equivalent.
- 1.4.5 For Travelling Showpeople, the unit of accommodation is described as a **Yard**, which is much larger than the Pitches provided for other groups. These yards will be anything from 100ft x 100ft up to 150ft by 200 ft, and the larger end of this range is recommended by the Showmen's Guild, as necessary to accommodate the increased size of vehicles and other equipment in addition to living accommodation.

2. Methodology

2.1 Overview

- 2.1.1 The Assessment brings together information from a variety of sources, to compile a schedule of estimated pitch requirements for the next 5 years.
- 2..1.2 The baseline information is the schedule of current pitches and caravan numbers, plus planning history and recorded unauthorised encampments, which was compiled from local authority records and the personal knowledge of the Gypsy and Traveller Group.
- 2.1.3 Using this baseline information as a starting point, interviews were carried out with as many as possible of the Gypsy and Traveller households from all the sites on the schedule, together with as many as possible from those who could be identified as being in housing, to establish present and future accommodation requirements, and also to gain greater understanding of educational, health, and social issues.
- 2.1.4 The schedule of current sites, and the accommodation requirements identified though the interviews, are set out in the Appendices and are summarised in sections 3 and 4. These are broken down not only by local authority area, but also by category of site, to ensure that the needs of different groups can be identified separately and a sufficiently detailed summary of requirements provided to ensure that pitches identified in Local Development Documents are likely to be appropriate to the needs they are intended to meet.
- 2.1.5 At the commencement of the Assessment process, it was anticipated that there were around 420 Gypsy and Traveller families in the study area, and it was hoped that it would be possible to interview 80% of them, which would be 336.
- 2.1.6 The schedule shows that a total of 492 pitches were identified, excluding 32 that were vacant and not available for use¹. 255 families were interviewed, representing 52% of the total number of families.
- 2.1.7 A further 59 families in bricks and mortar housing were interviewed, and while a further small number were not prepared to be interviewed, there is no way of assessing what the number interviewed represents as a proportion of the total. In all, 314 interviews were completed, which is only slightly less than planned; but this represents a lower proportion than had been hoped for. On local authority sites the target was exceeded, with 82% of all families interviewed 161 out of 197.

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¹ (A private site in Stratford-on-Avon District with planning consent for 34 pitches where the owners were no longer prepared to let pitches to other families, and with just one family in permanent occupation)

On showpeople sites the proportion was 44%, (as many were still travelling); and on private sites it was 43%, (after adjusting for the vacant site). In most instances the failure to achieve an interview was due to the family being temporarily away from the site, and the difficulty in making repeated visits to the smaller and more remote private sites.

- 2.1.8 On "Unauthorised and Not Tolerated" sites (see definition in 2.2.1) only 19 interviews were achieved out of an estimated 112 families. A 17% sample of such a small total number, means that the results for this group cannot be taken as being statistically accurate or representative, particularly as out of the three largest groups, in Worcester, Redditch and Warwick, amounting to 62 families, only 5 agreed to be interviewed. The position is further complicated by the evidence of unauthorised encampments collected by the county council Gypsy and Traveller liaison officers, which shows that over the course of a year the number of families could be significantly higher than the 112 families identified during the course of the survey, even if the number at any one time does not appear to exceed that number. For this category, and particularly in these three districts, the Gypsy & Traveller Group therefore had to use its experience and judgement to arrive at recommendations.
- 2.1.9 Where recommendations for additional site provision cannot be supported by representative survey based evidence as for the largely Irish and very transient group in Worcester, Redditch and Warwick in particular the approach has been to account for the numbers that are certain to be needed, plus a cautious provision for the less certain ones. This report has been careful to avoid the risk of making recommendations that would involve high levels of investment and effort that might not stand up to close scrutiny, or which might prove to be unjustified in the outcome.

2.2 Site Categories

2.2.1 All existing sites have been categorised in line with the January and June Caravan counts that are collated by the Government, which are:

Authorised Sites (i.e. with permanent planning permission) – either managed by a local authority (or RSL), or in private ownership.

Unauthorised Sites - Owned by the Occupiers – either 'Tolerated' or 'Not Tolerated', which indicates whether the priority should be to either bring the site into an acceptable condition or limit its occupancy in some way, or alternatively whether the priority should be to re-locate the occupiers as soon as possible.

Unauthorised Sites - Not Owned by the Occupiers – again either 'Tolerated' or 'Not Tolerated'.- the latter are described as **Unauthorised Encampments.**

- 2.2.2 The Assessment assumes that all Unauthorised Sites that are 'Tolerated' even if they have a temporary planning permission, represent a need for alternative provision. Although it may be neither practical nor desirable to seek to bring the use of such sites to an end immediately, especially when there is already a severe level of underprovision, in due course these sites will need to be either replaced or authorised. They are therefore included in the estimate of the total number of additional pitches required, with the proviso that if permanent use is authorised, that action will be the equivalent of allocating a new site, so they will then contribute to meeting the target for new provision,
- 2.2.3 Sites, and the survey responses, have been further categorised by the type of occupant Gypsy/Traveller, Irish Traveller, New Traveller, and Showpeople as it is not usual for these different groups to wish to live on the same site. There are a very few isolated examples of such integration, which could be argued to be 'the exception that proves the rule'.
- 2.2.4 Almost all of the need arising from **established sites whether local authority or privately owned** is from English Gypsy families who are seeking accommodation on that type of site which will form their permanent base.
- 2.2.5 Conversely, almost all of the need arising from unauthorised encampments, on land not owned by the occupiers, is from Irish Traveller families who have not shown a wish for a permanent base on a managed site. However, this should not be taken as an absence of a need for any form of site provision, as few agreed to be interviewed and there is an indisputable need for an alternative to the routine occupation of both public and privately owned sites without any form of permission or authorisation.
- 2.2.7 The needs of **Showpeople** are quite distinct being for 'yards' which are larger than the standard pitches provided for Gypsy and Irish Travellers, and privately owned and managed, as explained in 1.4.3.

It is the firm view of the Project Team that provision should be considered separately for each of these 3 groups – Gypsies, Irish Travellers, and Showpeople – as set out in Section 3.

2.3 Need Categories

- 2.3.1 The purpose of the Assessment is to identify the number of additional pitches required over a 5 year period. This means the net requirement after taking into account any vacancies that might be created through death, or through moving into housing or out of the area, which would reduce the number required for meeting present unmet needs and emerging new needs. Given the generally settled nature of the Gypsy Traveller population, and tendency for extended families, the number of vacancies from household dissolution or moves out of the area can be expected to be very low. There is some potential for moves into housing, or from the larger managed sites onto individual owner occupied plots, and this is considered on a site by site basis within each district, albeit that this may often represent aspirations that are either unrealistic or highly problematic. The schedule at Appendix 1 sets out the need arising from each of the following categories, and the following notes provide definitions for the column headings used and explanations as to how the numbers have been arrived at:
- 2.3.2 Replacement of Unauthorised and Not Tolerated Sites: All pitches on sites categorised in this way, whether the occupants were interviewed or not, are assumed to require re-location, so they are included in the total of additional pitch requirements.
- 2.3.3 **Unmet Current Need:** Any response to Questions 6 and 13 that shows that a member of the household being interviewed has already applied for their own accommodation, is treated as representing a need for an additional pitch unless the answers to the subsequent questions indicate that some other form or location of accommodation is required.
- 2.3.4 **Future Need:** The same approach is taken with Question 16 which asks if any adult members of the household would like to apply for their own accommodation. While this may represent a less immediate need, it would seem to represent need arising in the early part of the 5 year scope of the assessment for additional pitch requirements.
- 2.3.5 **Potential Need:** There are two options for estimating the level of need that will arise from new household formation applying a percentage figure that has been recommended in national guidance as representing a fairly reliable average, or by deducing it from survey responses. Given the high level of responses achieved, and the variable nature of households within the area, let alone across the country, it is clearly preferable to use the latter.
- 2.3.6 Question 11 asked for the make up of the household by age range, which allows for the total number of 11- 20 year olds to be arrived at for each site. To avoid potential double counting, any of these who may have been included in responses to Questions 6, 13, and 16, and counted as current or future need, have been excluded from this total. The remaining number therefore represents the theoretical maximum

- number of potential future households not already accounted for, on the basis that household formation tends to take place at a very young age.
- 2.3.7 Clearly, there are a number of factors that will reduce this number in reality. Some are quite likely to form a household with another person from within the local Gypsy and Traveller community, some may inherit a pitch from another family member, and some may move into housing or leave the area altogether. However, anecdotal evidence suggests that far more marriages involve a young person moving into the area than moving out, and that very few have either inherited pitches or moved into housing.
- 2.3.8 By halving the number of 11-20 year olds who are not already accounted for as current or future need, and adding in the number of interviewees who are in housing but have indicated they do not intend to remain there, the Gypsy & Traveller Group arrived at a cautious estimate of potential future need.
- 2.3.9 Where it has not been possible to interview households an estimate has been made based on the age profile of those households as identified by the interview team. It should also be noted that it was felt there was an under-recording of 11-16 year olds: Some of the responses showed smaller numbers in this age group than were already believed to exist, which would be explained by respondents not wishing to admit to having children of secondary school age who were not attending school.
- 2.3.10 Potential Vacancies: Where interview responses have indicated a wish to move from site accommodation into housing, or to acquire their own site, these have been identified as potential vacancies that is, vacancies that might be enabled by the local authorities in some way. Indications of a wish to move to another part of the country have not been included in this category, as this would almost certainly be outside the influence of any authority or partner agency, and there is no evidence that such aspirations are likely to be achieved.
- 2.3.11 There is some potential for moves into housing, or from the larger managed sites onto individual owner occupied plots, but that this may often represent aspirations that are either unrealistic or highly problematic. Some of those respondents that have applied for housing have been made offers that they consider to be unacceptable, and with the acute shortage of social rented housing, especially in rural areas which are close to families and friends, there is no evidence that housing will be available to many of those who seek it. In areas where the offer of social housing is for newly built accommodation the take-up tends to have a knock-on effect on the willingness of other families to move into neighbouring properties. This can be evidenced by the large number of Gypsy and Traveller families who have moved into houses in Stratford and Bidford. It is also the case that many Gypsy and

- Traveller families, particularly Irish Travellers, develop a high mobility level within housing, moving quite frequently and regularly between properties.
- 2.3.12 Similarly, while there is a fairly frequently expressed aspiration for an individual owner occupied plot, and several respondents claiming they could afford to purchase and develop this to the required standards, the reality is that finding a willing vendor and obtaining planning permission represents a huge challenge. Even where a willing vendor can be found, the site may be unsuitable and might be purchased in the mistaken expectation of obtaining consent.
- 2.3.13 For these reasons, the Gypsy & Traveller Group feel that it would be unrealistic to assume that the potential vacancies from these alternatives will actually occur, so these numbers have not been deducted from the gross need requirement. However, in so far as they do occur, it would be appropriate to treat these as contributing to the overall target, as they will release pitches for others to occupy. It will be the responsibility of local authority and housing association landlords to identify the numbers housed, as these will contribute to meeting the targets for providing new pitches.
- 2.3.14 None of the potential vacancies have been added to the estimate of supply, as there is no evidence of any certainty that this could be achieved. However, when assessing the requirement for additional sites, the level of potential vacancies, and the proportion of need that is potential rather than definite, have been taken into account in order to avoid the risk of making excess provision (see Appendix 1a).

2.4 Total 5 year Pitch Requirement

- 2.4.1 Given the fact that a fairly cautious approach has been taken to potential need, and in the absence of any provision for needs arising from those households who were not interviewed and whose family composition could not be established, the figures in the end column of Appendix 1b could be taken by each district as indicative of the target for site allocations within their Local Development Plans for a five year period. However, it should be noted that Government Guidance is very clear that the target numbers for each district will be identified by the Regional Spatial Strategy, which takes a broader view of the subregion, and the region as a whole, guided by this and other subregional Assessments.
- 2.4.2 Due regard should also be given to the more detailed recommendations in section 3 as to the location and size of the sites that are allocated: These vary considerably between districts, to reflect the differing nature of the Gypsy and Traveller community in different areas, and the fact that the overwhelming majority of potential

households have expressed a need to be close to other family members for the purpose of giving and receiving care and support.

- 2.4.3 It should also be recognised that larger local authority managed sites may not always be an acceptable substitute for the small privately owned family site which some respondents have indicated as being their preference. The Government's requirement for specific site allocations, rather than criteria based policies for responding to sites identified by the prospective occupier, could represent a problem for local authorities: How do they identify the type of individual family site that would be most appropriate for the very small number of potential occupiers in any single district and if they fail to do so, how will they be able to compel the occupation of local authority or RSL managed sites if that is the only option?
- 2.4.4 There would seem to be three ways in which this problem can be overcome:

Firstly, individual sites could be promoted through the Local Development Plan process – in the same way as housing sites are promoted - by their present or potential owners or agents. These would count towards the total requirement, and therefore reduce the number of pitches that the local authority would have to identify themselves.

Secondly, Local Development Documents could include criteria based policies in addition to the required number of site allocations, making it clear that any sites that are granted consent under this policy would count towards the overall target if it had not already been reached. In the same way, any pitches released by moves into housing, or other forms of permanent accommodation, would count towards the target.

Thirdly, the allocation of a site does not in itself prescribe the tenure or future ownership and management of the site: if small sites are allocated – in line with the preferences expressed by interviewees as shown in Tables 3, 4 and 5 in Section 6 – some of these may be taken up by owner occupiers or by private managers.

3. Total Pitch Provision & Requirement for the Area

3.1 The Interim Regional Statement

- 3.1.1 Before considering the level of need for additional pitches that has been identified by this Assessment, it will be useful to consider the findings of the West Midlands Regional Assembly's Interim Regional Statement on Gypsy and Traveller Policy (March 2007).
- 3.1.2 This used a formula to arrive at a provisional pitch requirement figure for each sub region for a 5 year period, based on the caravan count numbers from January 2006, and calculated a requirement for the South Housing Market Area of 170 additional pitches.
- 3.1.3 **The Region's formula** was: "Pitch requirement for an area equals the number of unauthorised development pitches in the area plus 40% of the number of authorised pitches in the area." Using this formula was justified as follows:

"In a study which appeared both to be robust and to produce results broadly similar to others across the country, the GTAA-assessed requirement less the number of unauthorised development pitches represented about 40% of current authorised pitches". (Interim Regional Statement, Annex 3, p20)

- 3.1.4 The caravan count for January 2006 suggested that the number of authorised caravans was 430. Assuming 1.7 caravans per pitch, this equated to 287 pitches. The number of unauthorised caravans was 81, which equated to 54 pitches. The Region therefore estimated the pitch requirement at 170, using the formula in 3.1.3: (54 plus 40% of 287, ie 54 plus 115 = 169), rounded to 170.
- 3.1.5 **This Assessment** has established that while the number of authorised and tolerated pitches (excluding the 66 for Showpeople), is close to the number indicated in the Regional Statement,, the number of unauthorised and not tolerated pitches is not 54, but 133. This includes 20 on local authority-owned and managed sites (see Table 1).
- 3.1.6 Applying the same formula, the total pitch requirement would be increased by the difference between the estimated and actual number of unauthorised pitches: that is 133 54 = 79.. That would increase the pitch requirement from 170 to 249, which is almost 50% above the provisional estimate, without accounting for the additional 22 pitches required for Showpeople (not included in caravan counts).
- 3.1.7 The way that caravans and/or pitches are counted may vary between authorities. In recent caravan counts, the number of caravans stated is almost exactly double the number of pitches on authorised sites in Wychavon and Worcester, while in Bromsgrove, Stratford-on-Avon and Wyre Forest the numbers of caravans have been stated as equal to the number of pitches on authorised sites (see pitch definition in 1.4.2).

3.1.8 More importantly, there has clearly been a substantial under-recording of unauthorised sites in the caravan counts – with only 81 caravans counted, converted to 54 pitches, against the 133 families on unauthorised and not tolerated sites that were identified by the Assessment.

If the provisional estimate had been based on the correct number of unauthorised pitches, plus a provision for Showpeople, the total would have been 170 plus 79 plus 22 = 271 - which is almost identical to the recommendation for an additional 272 pitches contained in this Assessment.

3.2 Current Pitch Provision

- 3.2.1 The combined effort of the project team has enabled the compilation of a schedule of sites into the main categories within each district, which is sufficiently complete and accurate to enable a reliable judgement to be made as to the scale and nature of current provision, and to provide the basis for calculating future requirements in conjunction with the results of the interview survey.
- 3.2.2 This schedule, which is set out in full at Appendix 1 of this report, can be summarised to show that a total of 513 Gypsy and Traveller pitches have been identified across the sub region:

Table 1: Distribution of Existing Pitches by Category and District

| | Author Sites | rised | Unauthoris land | ed – own | Unauthorised Encampment | Total |
|---------------------|-----------------|---------|-----------------|------------------|----------------------------|-------|
| District | LA | Private | Tolerated | Not Tolerated | Not Tolerated (see note) | |
| Bromsgrove | 18 | 8 | 0 | 0 | 0 | 26 |
| Malvern Hills | 5 | 32 | 3 | 2 | 14 | 56 |
| Redditch | 0 | 31 | 0 | 0 | 15 | 46 |
| Stratford | 30 | 11 | 3 | 0 | 22 | 66 |
| Warwick | 0 | 5 | 0 | 0 | 26 | 31 |
| Worcester | 20 | 0 | 0 | 0 | 21 | 41 |
| Wychavon | 73 | 50 | 10 | 0 | 21 | 154 |
| Wyre Forest | 31 | 28 | 1 | 0 | 12 | 72 |
| Sub-Region Total | 177 | 165 | 17 | 2 | 131 | 492 |

Note: Unauthorised Encampments are counted as the maximum number that have been identified at any one point in time. Anecdotal evidence from Gypsy and Traveller liaison staff shows that while some families move around the area on a regular basis, a far greater number move in and out of the area only once in a while. However there is no definitive record of the total numbers of individuals involved, which is likely to be higher than Table 1 indicates.

3.2.3 Apart from local authority managed sites, it is not possible to be absolutely precise, as it is not always evident whether a pitch has been left vacant temporarily or abandoned altogether, and it is possible to miss out some groups which move regularly between un-authorised sites - particularly Irish travellers - but the figures in Table 1 represent the first, and only attempt to produce a comprehensive schedule that incorporates the personal knowledge and records of all the agencies involved in the Assessment. The only pitches that have been identified as being permanently vacant are those described in 2.1.6, (the private site in Bidford on Avon which is no longer available for use) and these have not been included in the schedules of total current pitch provision. The potential for creating additional pitches within existing sites has also been considered, and the view taken that this is negligible. All additional capacity will therefore have to be found from new sites. Full data on individual sites, as well as the survey database, are available to local authorities for updating and further analysis, but for data protection reasons that has not been included in the report.

The Gypsy & Traveller Group strongly recommends that the full schedule at Appendix 1b, together with the site by site schedules from which it was built up, be used as the basis for all future Caravan Counts, and for the routine updating of this Assessment, to ensure that the benefit of this work is maintained.

- 3.2.4 Table 1 shows how both the provision of authorised sites and the incidence of unauthorised encampments are unevenly spread across the sub-region. There are 3 key points to be made:
- 3.2.5 More than half of the **total number of families** (251 out of 492) is in South Worcestershire (Malvern Hills, Worcester and Wychavon), with the other half divided between North Worcestershire (144 in Bromsgrove, Redditch and Wyre Forest) and South Warwickshire (97 in Stratford and Warwick).
- 3.2.6 **Unauthorised encampments** are concentrated around the main towns, with over half (62 out of 112) being the larger encampments in or close to Warwick, Worcester, and Redditch. Many of the remainder are in or close to urban areas and the A38 and M5, (apart from Stratford-on Avon where they are spread across the district).
- 3.2.7 **Private Sites with planning permission** represent the second largest category of sites, with 165 pitches, almost as many as the 177 on local authority sites. This 165 includes 66 for Showpeople, which are almost all in Redditch and Malvern. All but 6 of the remaining 99 private sites for Gypsies and Travellers are located in three of the eight districts Malvern Hills, Wychavon and Wyre Forest. These districts have the

lowest levels of unauthorised encampments, but they also represent a very large proportion of the rural parts of the sub-region, which may be a more relevant factor.

3.3 Additional Pitch Requirement

This Assessment indicates that there is a net potential need for 272 additional pitches across the 8 districts. 22 of these are for Travelling Showpeople, and the rest for Gypsies and Travellers.

- 3.3.1 The schedules at Appendix 1 set out the additional pitch requirement by both district (1b) and by site category (1a), showing the location and category of site from which the need arises.
- 3.3.2 The total requirement for 272 pitches amounts to an average of 34 per district over 5 years, although this is not by any means evenly distributed in location, type of site, or timing, as will be shown in the next section of this report.
- 3.3.3 While the net total of 272 is substantially greater than the provisional estimate of 170 in the Interim Regional Statement, the previous section has shown that it is almost exactly the same as would have been produced had the formula been applied to the correct number of existing families, rather than Caravan Count numbers (which are shown to be a significant under-statement of the true position).
- 3.3.4 As explained in 2.3.14 above, when the specific site requirements for each district were considered by the Gypsy & Traveller Group, some minor adjustments were made to the gross need figures (as shown in Appendices 1a and 1b),. These adjustments (for Bromsgrove, Wychavon and Wyre Forest), reduced the gross pitch requirement (289) by 17, to a net figure of 272 (see 7.1 below)
- 3.3.5 There are a number of ways in which the total requirement might be reduced eg vacancies could be created through moves into housing or through the authorisation of currently unauthorised sites and temporarily tolerated or approved sites. It is not possible to specify where exactly these vacancies might occur, as the numbers will be very small and dispersed, but it is appropriate that the number of new pitches recommended is slightly lower than the gross requirement.
- 3.3.6 **Inward Migration** has not been provided for, but it is recognised that the sub-region is subject to in-migration pressures, just as it is for housing. In particular, a group of 20 people wishing to move into the area have expressed a tentative interest in a site in the northern part of the sub-region.

4. Analysis of Current Provision and Future Requirement by Category of Site

The level of both current provision and future need can be analysed firstly by category of site, giving an overall understanding of the subregional picture, and in the next section this is then broken down by district to inform the process of site identification and allocation in Local Development Plans.

4.1 Local Authority Managed Sites

- 4.1.1 These amount to 177 pitches, just over one third of the total, on 11 sites 1 each in Bromsgrove, Malvern Hills, Stratford and Worcester, 2 in Wyre Forest and 5 in Wychavon almost entirely occupied by Gypsies.
- 4.1.2 Investment in these sites has been considerable in recent years: In Worcestershire £3.7m has been spent on 4 of the 10 sites over the last 5 years, and a further £5.2m at today's prices is required to bring the remaining 6 sites up to the required standard. In South Warwickshire £1.6m is being spent on one site in Stratford-on-Avon District for 30 pitches.
- 4.1.3 All of the sites are full, despite the addition of further pitches as part of recent improvements, and there are at least 20 families who have doubled up on existing pitches while waiting for a vacancy. There are a further 60 on the waiting list, half of whom are on the roadside both inside and outside the area, with the other half staying with friends or family, either on private sites (often without permission) or in housing.
- 4.1.4 There is virtually no prospect of any of the local authority pitches becoming vacant, as although 11 out of the 197 families have expressed a preference for housing, the reality is that there have been almost no vacancies at all over the last 2 years, and only 1 of the current families comprises an elderly household with no younger family members. The shortage of accommodation is so acute that when vacancies have occurred they have immediately been occupied without permission, creating further delays and expense in ensuring they are eventually allocated to the highest priority applicant.
- 4.1.5 The schedule at Appendix 1a shows a need for a further 88 pitches to accommodate the combination of current and potential need from within the existing local authority sites. All but 11 of this 88 arises from the 3 South Worcestershire districts and Wyre Forest, before taking any account of the requirement to make legitimate provision for others currently on Unauthorised and Not Tolerated sites, let alone meeting the needs arising from these other sites in the future. Of the 88, 51 represents current or imminent need, so although this is

- projected to meet need over a 5 year period, most of it will be needed in the early part of that period.
- 4.1.7 Whether 88 additional local authority pitches will be sufficient, depends on the extent to which other measures will be available: it could be assumed that those who are not on local authority sites, and have not applied for a pitch on one, would not be prepared to accept one even if it were made available. However, with 60 applicants on the waiting list, (including some who have not been included in the Assessment because they are currently outside the area), and the slow rate of vacancies, there is a substantial deterrent to making an application, and new sites might be attractive to those who would reject the existing ones, so it is reasonable to assume that local authority or RSL site provision would have a far wider appeal, so the figure of 88 should be considered the minimum required to meet needs arising from private sites, unauthorised encampments and housing.

4.2 Privately owned sites

- 4.2.1 Over one-third of all pitches are on privately owned land, but there is considerable variation across the study area:
- 4.2.2 The majority of the sites are owned and occupied by single families most particularly in Wychavon and Malvern Hills Districts, which have successfully operated a policy of approvals and toleration for such sites. These sites will generate some need for additional pitches, and although the continuation, and wider use, of these policies might accommodate some of this need, under present Government guidance it is necessary to allocate specific sites rather than respond to applications as they occur.
- 4.2.3 The balance are mainly in two clusters one in Wyre Forest District, in the same area as one of the local authority sites in Stourport, and the other in Stratford District, in Bidford on Avon.
- 4.2.4 The **Wyre Forest** (Stourport) sites are likely to generate very little need, which could be balanced by potential vacancies, as 6 of the 15 families interviewed expressed a preference for housing.
- 4.2.5 The **Stratford-on-Avon District** (Bidford on Avon) sites however represent a problem, in that one (unauthorised) site that is currently occupied by 11 families is due for re-development, while another site, with approval for 34 pitches but with just 2 pitches currently occupied, is being cleared for re-use as a general purpose caravan/mobile home site and the owners refuse to accommodate anyone outside their own family. The latter is counted as being effectively a site with 2 pitches, as there is no way of making the owners exercise their planning permission in full.

4.2.6 The project team have therefore considered that a further 30 pitches will be required to meet the needs from these private sites, with two-thirds of the requirement being split equally between Malvern Hills and Wychavon Districts, with the balance divided between Stratford and Wyre Forest. The detail of this requirement is shown in the schedule at Appendix 1a.

4.3 Sites for Travelling Showpeople

- 4.3.1 **Government Circular 04/2007**, issued in August 2007, states that the needs of Travelling Showpeople should be treated in a similar way to those of Gypsies and Travellers as set out in Circular 01/2006.
- 4.3.2 The Interim Regional Statement on Gypsy and Traveller Policy issued in March 2007 was followed in October 2007 by a **Supplement on Travelling Showpeople,** which describes how their requirements differ from other Travelling groups in that they require sites of up to 12 'yards', rather than pitches, where each 'yard' can accommodate not only an extended family but also the larger equipment and associated vehicles, and often a more permanent type of mobile home or chalet. The Supplement provides an estimated requirement across the West Midlands region for 48 family yards to address current overcrowding, rising to between 63 and 84 family yards to accommodate needs up to 2016, but it does not suggest how these might be distributed between districts.
- 4.3.3 There are 7 Showpeople sites in the sub-region, 1 in Bromsgrove with 8 yards, 1 in Malvern Hills, with 17 yards, 3 in Redditch with 31 yards, and 1 each in Stratford and Warwick, both with 5 yards. A combination of survey interviews and discussion with the local Showman Guild representative has arrived at an estimated requirement for 22 additional 'yards' located in Malvern Hills (8) and Redditch (14). The site in Warwick is vacant, but there is no evidence of need for Showpeople; so the possibility of its being used to meet some of the requirement for Gypsies and Travellers should be considered.

4.4 Unauthorised Encampments

- 4.4.1 A total of 150 unauthorised pitches were identified, (see schedule 1a): 19 of these are on the occupiers' own land (of which 17 are either tolerated or granted only temporary planning permission and another 2 are not tolerated).
- 4.4.2 The remaining 131 are on other people's land and not tolerated. These include 20 on local authority sites, representing extended families that have dealt with their overcrowding problems by bringing on to the site more caravans than are permitted. Almost all of the rest were occupied by Irish Traveller families, in groups of up to 25 caravans, mainly in Warwick and Worcester but also in Redditch and Wychavon.

As explained above, not all of these families intend or wish to stay in the area permanently. The number varies considerably over time, and although a much larger number of different families have visited the area, the maximum number that will be present at any one time is estimated at this figure of 111 (see Appendix 1a).

- 4.4.3 A **total of 123 additional pitches** (see Appendix 1a) is required to deal with this category of site, spread fairly evenly across all districts apart from Wyre Forest and Bromsgrove. 110 are needed to meet current need, with a further 13 to meet needs arising from within this group over the next five years. Almost all of these pitches are required to meet the needs of transient groups who have shown no evidence of seeking a permanent base, although the possibility of some of these groups becoming more settled, given the opportunity, cannot be ruled out. Some of this need might be accommodated on new local authority sites, but the contrasting lifestyles between the more settled Gypsy community and the predominantly itinerant Irish community means that these needs cannot be treated as being interchangeable.
- 4.4.4 The Gypsy & Traveller Group came to the firm conclusion (supported by interview responses) that there was no need within the area for managed Transit Sites, as there was no pattern of regular movements for which they would cater. Transit sites, requiring major investment and permanent management, could be justified only if there was a well established and regular flow of movements through a particular area, and no such pattern was identified. The Group did, however, feel that there was a definite need for a number of Temporary Stopping Places, for which there is at present no existing or planned provision. As well as identifying sites for allocation as Temporary Stopping Places, as part of the overall provision for additional pitches, it will be necessary for arrangements to be put in place for their proper management and co-ordination.

4.5 Temporary Stopping Places.

- 4.5.1 These would be sites which could be made available for short term use, as and when required, and for which provision could be made for mains water and waste collection when the sites were in use. They would not initially require expensive infrastructure, maintenance and management, but would be a much more controlled and acceptable alternative to the present pattern of unauthorised encampments. If, in due course, it emerged that there was a need for these sites to be occupied on a more regular, or even permanent, basis, then the necessary infrastructure could be provided in response to specifically identified requirements.
- 4.5.2 Temporary Stopping Places would provide for a speedy and flexible response to the problem of Unauthorised Encampments: District authorities can use the Caravan Sites and Control of Development Act

1960 to license and regulate sites for up to 28 days occupancy in any 12-month period, without the need to grant planning permission (or to obtain substantial grant funding for development of the sites) in advance of a long term need being proven.

4.5.3 The Interim Regional Statement (paragraph 39) identifies this type of solution as one of the options that local planning authorities may wish to consider – describing them as "Land identified for Tolerated Camping (managed and refuse removal, plus toilet provision, catered for)"

Suitable sites for Temporary Stopping Places should be identified close to main roads, in all of the locations identified by the Gypsy & Traveller Group as being where the majority of short stay Unauthorised Encampments take place; with at least one in each district (apart from Wyre Forest and either Redditch or Bromsgrove - which could share one close to their joint boundary).

It should be recognised that planning consent will be required for ongoing use as a Temporary Stopping Place if any of them are required to be used for more than 28 days a year. Where a TSP is being heavily used, this may indicate a need for a permanent site in a suitable alternative location.

There will be a particular need for cross boundary collaboration, as Temporary Stopping Places are required to accommodate families that, for the most part, show no greater connection with one district than with another.

4.6 Gypsies in Housing requiring site accommodation

- 4.6.1 It is quite well established that some Gypsy and Traveller families will move into housing as a short term expediency rather than as a permanent choice, and the Government guidance on carrying out Gypsy and Traveller Accommodation Assessments make it clear that the need for site accommodation from those currently in bricks and mortar housing should be considered, as well as the need for housing from those in site accommodation.
- 4.6.2 There is no data source that identifies Gypsy and Traveller families in housing, so interviews with this group can only be carried out on the basis of personal knowledge and referral. A total of 59 interviews were carried out, mainly in Malvern Hills, Wychavon and Wyre Forest, but also in Stratford, Worcester and Bromsgrove. The number and distribution of this group should not be deduced from the numbers interviewed, but Malvern Hills, Wychavon and Wyre Forest, with 44 out of the 59 interviews, probably have a higher proportion than others.

- 4.6.3 Out of the 59 households interviewed, only 4 had actually applied for a pitch, and were therefore counted as Current Need, but a further 22 said they did not intend to remain in housing, so were counted as Potential Need, giving a total need for 26 pitches. However, where potential need included half a dozen or more from this source (Wychavon and Wyre Forest Districts) or where there was some prospect of vacancies becoming available on a local authority site (Bromsgrove District), a reduction was made when assessing the appropriate number of pitches to be provided on new sites (see 3.3.4 above).
- 4.6.4 There is no way of estimating how many more Gypsy and Traveller households might represent Potential Need, so any provision above the figure of 22 would be pure guesswork. Nevertheless, this figure should be treated as a minimum, and probably a very conservative estimate of total potential need.

4.7 Locations for new pitches

- 4.7.1 The location of these pitches should reflect the detailed recommendations in the next section which considers this on a district by district basis. There are, however, some broad principles that need to be considered in setting the broad objectives for policy and investment:
- 4.7.2 Firstly, it is very clear from the survey that the Gypsy Traveller community in this sub-region is overwhelmingly a well established and settled community, with established and extensive family ties. Almost without exception, respondents sought to remain in the same area:

Question A1 in the survey asked how long the family had been at their current location: 81% (149 out of 184) had been there for 3 or more years, (90% in Wyre Forest) and only 6% (11) for less than a year.

Question 9 asked if there was a permanent location outside the area, and only 9 answered yes, 6 of them on unauthorised sites, 1 in housing, 1 on a private site and 1 on a public site. Of the 9, 5 were Irish Travellers with addresses in London and Southampton, and 4 were Gypsy Travellers with addresses in adjacent districts.

Question 30 asked for the preferred location, and of the 255 households interviewed on sites, only 16 gave locations outside the study area – 4 from local authority sites, 8 from unauthorised sites and 4 from showpeople sites. An overwhelming majority gave a location that was either their present one or within the same district.

The answers to these questions do not justify making any reduction in the additional requirements on the basis of the potential for vacancies being created through moves out of choice.

- 4.7.3 The view is often expressed that those authorities that have in the past made better provision than others have inevitably attracted larger numbers of families, and should not be penalised by having to make greater provision still in the future, while those who have failed to make proper provision in the past are allowed to get away with making none at all. However, this argument does not justify attempting to accommodate people where they do not wish to be indeed it is most unlikely that any such attempt would be successful. It has to be recognised that past provision has often resulted from historic work patterns and established local connections, and that population growth occurs, and is accommodated as far as possible, in all communities.
- 4.7.4 Availability of suitable sites will also be a factor in making allocations, and some flexibility will be required to account for this as well.

4.8 Summary of Pitch Requirements

Table 2: Distribution and Source of Additional Pitch Requirement

| District | Replace Unauthorised | Over- crowding | Short term need (1-2 yrs) | Potential need (2- 5 yrs) | Gross Need | Adjust ment | Net Need |
|---------------|----------------------|-------------------|---------------------------------|---------------------------------|---------------|----------------|-------------|
| Bromsgrove | 0 | 0 | 0 | 3 | 3 | -3 | 0 |
| Malvern Hills | 18 | 1 | 7 | 18 | 44 | 0 | 44 |
| Redditch | 15 | 8 | 2 | 7 | 32 | 0 | 32 |
| Stratford | 25 | 2 | 4 | 13 | 44 | 0 | 44 |
| Warwick | 26 | 0 | 0 | 26 | 26 | 0 | 26 |
| Worcester | 21 | 1 | 3 | 11 | 36 | 0 | 36 |
| Wychavon | 20 | 3 | 9 | 35 | 67 | -7 | 60 |
| Wyre Forest | 12 | 4 | 7 | 14 | 37 | -7 | 30 |
| Sub-Region | 122 | 19 | 32 | 113 | 289 | -17 | 272 |

4.8.1 Table 2 is taken from the schedule which is set out in full at Appendix 1b of this report, and shows that a net total of 272 additional Gypsy and Traveller pitches are required across the sub region, after making the adjustments described in 3.3.4 and 4.6.3 to avoid the risk of localised over provision.

22 of the 272 pitches are required for Showpeople, and 88 are required for those already on local authority sites, leaving the balance of 162 for which the appropriate type of site has to be determined, bearing in mind that a large proportion of this number are Irish Travellers with a much less settled life-style to the Gypsy Travellers on local authority and private sites.

- 4.8.2 It is possible that some of the need could be met through **individual family sites**, along the lines of well established practice in Wychavon and Malvern Hills Districts, and in accordance with the preferences expressed by a number of respondents, as shown in 6.1.2 below. The main problem in seeking to answer this is the clear requirement in Government guidance for local authorities to allocate sites, and not rely on criteria based policies that are used to respond to applications for planning permission.
- 4.8.3 It is true that criteria based policies have often been far too restrictive to enable any effective implementation to be achieved, and that without the allocation of specific sites there is far less prospect of a significant (if any) level of provision being made. However, given the number of pitches required, the example of successful policy that is reactive and permissive rather than prescriptive, and above all the expressed wishes and established habits of the client group, the Gypsy & Traveller Group felt strongly that some part of provision should continue to be in the form of individual family sites.

Potential occupiers of individual family sites should be encouraged to promote them through the Local Development Plan process. Districts should, as part of that process, publicise and encourage representations to be made, so the suitability of such sites, and their contribution to meeting the shortfall in provision, can be properly examined and determined.

4.8.4 It is also possible that some of the need could be met by moves into housing: Table 10 in section 6 of this report shows that up to 24 local authority pitches might be vacated (half of them in Wychavon District) if the occupiers were successful in their application for housing, and a further 6 from private and unauthorised sites. No account has been taken of this in arriving at the need for additional pitches, as the extreme shortage of social rented housing in the area – especially larger family houses which are mostly required – does not make this a realistic prospect. There is also the problem of cultural differences between the Gypsy and Traveller community and the settled community which can make moves into housing problematic. Nevertheless, any pitches that are vacated as a result of moves into housing can be deducted from the total required.

5. Pitch Provision and Need for each District

5.1. Bromsgrove District

- 5.1.1 The only Local Authority residential site is full, and of the 10 out of 18 households interviewed, there was no identified need for additional pitches, even in the longer term, as there was only one person in the 11 to 20 age group. In fact, half of those interviewed expressed a preference for traditional housing, and 3 out of the 5 had been on waiting lists for over a year. Conversely, all 3 of the interviewees in housing expressed a preference for site accommodation in the local area, and while they would interested in public sites, they also showed an interest in part rent/part buy, and 2 believed they could afford to purchase and develop their own sites.
- 5.1.2 The Local Authority transit site is not in use at present, and might be suitable for meeting any future residential needs from this or adjacent areas, as there is no need for Transit accommodation in either this or the wider area.
- 5.1.3 **The 1 Private site** is for Showpeople, with no indication of need.
- 5.1.4 There are no current **Unauthorised Encampments.**

Recommendation- Bromsgrove District

There is no need to identify additional residential sites in Bromsgrove District, but consideration should be given to the redundant Transit site being used for residential need from the wider area.

It is also possible that some of the provision for Temporary Stopping Places described under Redditch Borough might be appropriately located in that part of Bromsgrove District which borders Redditch. This would provide both districts with a shared facility for dealing with future unauthorised encampments.

5.2 Malvern Hills District

5.2.1 The only Local Authority residential site is full, and of the 5 out of 11 households interviewed, there is an immediate need for 6 pitches to address overcrowding, plus 5 for future need, which requires the acquisition and development of new local authority/RSL site. That amounts to a need for 11 additional pitches. Only one of those interviewed expressed a preference for traditional housing, while 3 of

- the 13 interviewees in housing sought site accommodation in the local area, with 2 of them interested in part rent/part buy.
- 5.2.2 There are 7 private sites with planning permission, accommodating between 1 and 4 families on each site, which represents a need for 11 additional pitches that could be accommodated either through the interested parties identifying their own sites, or through the new public site having sufficient capacity. Half of these are required in the next 2 years, and the remainder within 5 years.
- 5.2.3 **There are 2 Showpeople sites**, where there is a need for **8 further** 'yards', requiring the acquisition and development of a new site.
- 5.2.4 **Unauthorised Encampments** occur routinely, comprising small groups of Irish Traveller families mainly in the Upton-upon-Severn and Malvern areas, for which a Temporary Stopping Place of about 10 pitches are required.

<u>Recommendation – Malvern Hills District:</u>

- 1. 26 additional pitches are required for Gypsies on existing public and private sites. It is likely that much of this provision will need to be in the form of Local Authority or RSL sites although a lower level of public provision might be sufficient if further small private sites are established (see 6.2.4 below).
- 2. An additional Showpeople site for a minimum of 8 'yards'.
- 3. A Temporary Stopping Place for not less than 10 pitches to accommodate short-term needs, as defined in section 4.5.

5.3 Redditch District

- 5.3.1 There are 3 Showpeople sites which together present an immediate need for 8 yards and a further 6 to meet future need, which requires the acquisition and development of a new site of 14 'yards'.
- 5.3.2 **Unauthorised Encampments** are a regular occurrence, despite their not being recorded in Caravan Counts, and a group of 15 Irish Travellers have been identified as representing a typical example, requiring a site with **not less than 18 pitches** to accommodate future as well as current need.

Recommendation: Redditch Borough:

- 1. An additional Showpeople site for a minimum of 14 'yards'.
- 2. A Temporary Stopping Place for not less than 18 pitches to accommodate short term needs, as identified in 4.5. This might be located within that part of Bromsgrove District that borders Redditch, providing both districts with a shared facility for dealing with future unauthorised encampments, and providing flexibility in meeting differing levels of need at different times (see 4.5.3).

5.4 Stratford-on-Avon District

- 5.4.1 The only Local Authority residential site is full, and of the 23 out of 30 households interviewed, there was an expressed need for 6 additional pitches, plus 3 for future need, giving a requirement for 9 pitches. Only one of those interviewed expressed a preference for traditional housing, while 4 of the 8 interviewees in housing expressed a preference for site accommodation in the local area.
- 5.4.2 There are 3 privately owned sites with no security, regardless of planning permission:

Friday Furlong, Bidford on Avon, which is an unauthorised encampment, is due to be redeveloped for housing and several families have already left, leaving 11 to be accommodated: and at Tanworth/Earlswood, there are 3 families who have been granted a 3 year permission only Due to close family connections with families on sites in Wychavon, there is a strong possibility of this resulting in additional pressure on that district if suitable provision is not made locally. Allowing a further 6 to meet longer term needs increases the requirement to 20 pitches, but there is some uncertainty with this group, so the numbers need to be kept under review.

The Paddocks, has only 2 families remaining despite planning consent for 34 vans, as the owner is apparently keen to turn the site into general caravan use and refuses to accommodate anyone outside their own family, so the other 32 pitches cannot be assumed to be available either now or in the future. This has been treated as a site with 2 occupied pitches and no spare capacity.

- 5.4.3 **Unauthorised Encampments,** apart from Friday Furlong, comprise a number of mainly Irish Traveller families and one Gypsy family seeking their own site, amounting to a need for a further **11 pitches**, 10 of which would be most appropriately provided as a Temporary Stopping Place.
- 5.4.4 In total, there is therefore a need for 31 pitches arising from private and unauthorised sites, plus 9 from the local authority site, and 4 from housing, a total of 44 pitches.

Recommendation: Stratford-on-Avon District:

- 1. 34 additional pitches are required for Gypsies on existing public and private sites. It is likely that much of this provision will need to be in the form of Local Authority or RSL sites although a lower level of public provision might be sufficient if further small private sites are established (see 6.2.4 below).
- 2. A Temporary Stopping Place for not less than 10 pitches to accommodate short-term needs as identified in section 4.5.

5.5 Warwick District

- 5.5.1 There are no permanent sites either authorised or unauthorised in the district. There is an irregular pattern of short term unauthorised encampments that occur at all times of year, although none of these have occurred on days when the Caravan Counts have been taken. Although only 4 families could be interviewed in detail, from the briefer enquiries made by Warwickshire Gypsy and Traveller Service Officer, it was established that 28 out of 43 families expressed a wish to stay in the area, in addition to the 1 out of 4 who were interviewed in detail. The considered view of officers from both the District and County Council is that there is a need for 11 pitches now, and a Temporary Stopping Place for 15 pitches, giving a total of 26 pitches.
- 5.5.2 It is also their view that Warwick District Council needs to carry out interviews with Gypsy and Traveller families as they appear in the District over the next few months and produce a supplementary report to confirm or modify these numbers. Pending that report, the recommendation is that one permanent site and one Temporary Stopping Place should be identified as soon as possible, and that this requirement may need to be modified on the basis of further evidence.

Recommendation: Warwick District:

- 1. 11 pitches are required for Gypsies. It is likely that this provision will need to be in the form of Local Authority or RSL sites (see 6.2.2 below), but the potential for the vacant Showpeople site to meet part of the requirement should also be considered (see 4.3.3 above).
- 2. A Temporary Stopping Place for not less than 15 pitches to accommodate short-term needs as identified in section 4.5.

These recommendations should be reviewed in the light of the supplementary report proposed in 5.5.2 above.

5.6 Worcester City

- 5.6.1 The only Local Authority residential site is full, and from the 19 out of 20 households interviewed, there was an expressed need for 4 additional pitches, plus a future need for a further 9. Only one of those interviewed expressed a preference for traditional housing, but 2 of the 4 interviewees in housing expressed a preference for site accommodation in the local area (see Appendix 1b). Together with a single Gypsy family on an unauthorised site, that represents a total need for 16 pitches.
- 5.6.2 **Unauthorised Encampments** by Irish Travellers are a frequent occurrence around the northern and eastern edges of the City, and it has been estimated that this could amount to 20 families at any one time. There is some uncertainty as to how many of these need permanent site accommodation, and how many wish to remain transient, but the longer presence of one of the larger groups would suggest that a further residential site may be needed as well as a Temporary Stopping Place.

Recommendation: Worcester City

- 1. 16 pitches are required for Gypsies. It is likely that this provision will need to be in the form of Local Authority or RSL sites (see 6.2.2 below).
- 2. A Temporary Stopping Place for not less than 20 pitches to accommodate short-term needs as identified in section 4.5. This should be located to the north east of the City, close to the A38 and M5.If this provision is heavily used, it may indicate a need for some permanent accommodation as well.

Worcester City should liaise with Wychavon District regarding the opportunity for providing both districts with a shared facility for dealing with future unauthorised encampments and to provide flexibility in meeting differing levels of need at different times (see 4.5.3).

5.7 Wychavon

- 5.7.1 The 5 Local Authority residential sites are all full, and of the 73 out of 76 households interviewed, there was an expressed need for 9 additional pitches, plus 3 to deal with the excess number of existing caravans, and a further potential need for 16. There were 6 who expressed a preference for traditional housing, and 7 of the 17 interviewees in housing expressed a preference for site accommodation in the local area, so the need is for about 28 pitches from these sources.
- 5.7.2 The Cleeve Prior site of 8 pitches is held on a lease that has only 7 years to run, and renewing this may be either impractical or undesirable. This should be taken into account in determining the size and location of additional sites.
- 5.7.3 There are a large number of Small Private Sites which are either Authorised or Tolerated. 22 interviews were achieved from this group, out of an estimated total of 60, which showed an expressed need for 2 pitches and a future need for 8. No further provision has been made for need arising from the 38 who were not interviewed, as the Gypsy & Traveller Group's view was this was not likely to include a large proportion of young people, leaving a requirement for 10 pitches.
- 5.7.4 There are also a number of Unauthorised Encampments and Sites but only 4 interviews were achieved out of an estimated total of 18 families on sites that were routinely occupied. These sites are predominantly in the Droitwich and Fernhill Heath areas, by the A38,

but also in Cleeve Prior. After making allowances for the one family that had a permanent base outside the area, and for an estimated future need for 4 pitches, this represents a need for 21 pitches.

Recommendation: Wychavon District

- 1. 40 additional pitches are required for Gypsies on existing public and private sites. It is likely that much of this provision will need to be in the form of Local Authority or RSL sites although a lower level of public provision might be sufficient if further small private sites are established (see 6.2.4 below). Local authority or RSL sites should be located in the southern or Worcester fringe parts of the district.
- 2. Temporary Stopping Places for a total of not less than 20 pitches to accommodate short-term needs as identified in section 4.5. The sites should enable Wychavon to meet the differing levels of need which may occur at different times.

5.8 Wyre Forest

- 5.8.1 Both of the Local Authority residential sites in Stourport on Severn are full, and of the 31 out of 42 households interviewed, there was an expressed need for 10 additional pitches, plus 11 to deal with the excess number of existing caravans, and a further potential need for 6. There was just 1 who expressed a preference for traditional housing, and only 1 of the 14 interviewees in housing expressed a preference for site accommodation in the local area. The total need from these sources is therefore for 27 additional pitches.
- 5.8.2 In addition the smaller of the two local authority sites, with 8 pitches has a lease that expires in about 6 years time, which means it may not be considered to provide a satisfactory long term facility.
- 5.8.3 There is a cluster of Small Private Sites at Sandy Lane which are either Authorised or Tolerated. 16 interviews were achieved from this group, out of an estimated total of 29, which showed an expressed need for just 1 pitch and a potential further 2. However, 7 of the 16 households interviewed expressed a preference for housing, including a number who did not consider themselves to be Gypsies or Travellers.
- 5.8.4 **Only one Unauthorised Encampment** was identified, representing a need for a single replacement pitch.

Recommendation: Wyre Forest District:

30 additional pitches are required for Gypsies on existing public and private sites. It is likely that much of this provision will need to be in the form of Local Authority or RSL sites in the Stouport/Wyre Forest Area, – although a lower level of public provision might be sufficient if further small private sites are established (see 6.2.4 below).

Wyre Forest District should consider the suitability and sustainability of the Local Authority and Private sites at Sandy Lane, Stourport as part of this process, and identify further additional pitches as replacements if appropriate.

5.9 Broader Sub-Regional Requirements

Although the sub-region is subject to in-migration pressures, just as it is for housing, no provision has been made for meeting demand from outside the study area (see 3.3.6 above).

6. Other Issues Affecting Site Allocation

6.1 Size of Site

6.1.1 **Question 31** of the survey asked all interviewees what they felt to be the ideal size of site, and the answers have been analysed in three ways, by the respondent's district, by the category of site they are on, and their ethnicity:

Table 3. Preferred Size of Site by the respondent's district

| No. of Pitches | 0-5 | 6-10 | 11-15 | 16-20 | 21-25 | 25+ | Total |
|--------------------|-----|------|-------|-------|-------|-----|-------|
| Bromsgrove | 5 | 2 | 1 | 3 | 1 | 4 | 16 |
| Malvern Hills | 13 | 11 | 4 | 2 | 0 | 0 | 30 |
| Redditch | 2 | 1 | 2 | 0 | 0 | 1 | 6 |
| Stratford | 1 | 8 | 14 | 5 | 5 | 2 | 35 |
| Warwick | 0 | 0 | 2 | 1 | 1 | 0 | 4 |
| Worcester | 4 | 15 | 1 | 2 | 0 | 0 | 22 |
| Wychavon | 18 | 38 | 31 | 15 | 10 | 3 | 115 |
| Wyre Forest | 9 | 25 | 14 | 7 | 1 | 1 | 57 |
| Total Responses | 52 | 100 | 69 | 35 | 18 | 11 | 285 |

- 6.1.2 Overall, there is a strong preference for sites of less than 20 pitches, with over half preferring sites of no more than 10 pitches and over three quarters having a preference for no more than 15 pitches.
- 6.1.3 The strength of opinion in favour of smaller pitches is particularly marked in Malvern Hills District and Worcester City.

Table 4: Preferred Size of Site by respondent's site category

| No. of Pitches | 0-5 | 6-10 | 11-15 | 16-20 | 21-25 | 25+ | Total |
|-----------------|-----|------|-------|-------|-------|-----|-------|
| Local Authority | 15 | 66 | 35 | 22 | 16 | 6 | 160 |
| Private | 21 | 16 | 15 | 2 | 0 | 1 | 55 |
| Unauthorised | 2 | 1 | 7 | 4 | 1 | 0 | 15 |
| Housing | 14 | 17 | 12 | 7 | 1 | 4 | 55 |
| Total Responses | 52 | 100 | 69 | 35 | 18 | 11 | 285 |

6.1.4 There is clearly a stronger preference for larger sites from those on local authority sites – which reflects the fact that these sites are generally larger. Two thirds of those on private sites would like to see sites of 10 or less, and almost all the support for sites of more than 15 comes from those on local authority sites. Nevertheless, that still

- leaves half of all those on local authority sites favouring sites of 10 pitches or less.
- 6.1.5 This suggests that private sites should ideally be no more than 10 pitches, and public ones a mix of small (up to 10) and large (15 to 25).

Table 5: Preferred Size of Site by the respondent's ethnicity

| No. of Pitches | 0-5 | 6-10 | 11-15 | 16-20 | 21-25 | 25+ | Total |
|--------------------|-----|------|-------|-------|-------|-----|-------|
| Gypsy Traveller | 43 | 94 | 55 | 31 | 17 | 10 | 250 |
| Irish Traveller | 0 | 4 | 10 | 4 | 1 | 0 | 19 |
| New Traveller | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Showpeople | 4 | 2 | 4 | 0 | 0 | 1 | 11 |
| Total Responses | 48 | 100 | 69 | 35 | 18 | 11 | 281 |

6.1,6 The most significant feature of this analysis is that it places the Irish Traveller as favouring the middle size of site – 11-15 – rather than the very large or very small ones. It should be noted that most of the provision for this group will be in the form of Temporary Stopping Places. It is also clear that Showpeople, who are a much more settled group, favour the small to medium sized site.

6.2 Tenure of Site

6.2.1 Questions 27 whether the interviewee would be interested in a part buy/part rent site accommodation if it were available, and Question 28 asked whether they could afford to purchase and develop their own site to the required standard. Those answering yes have been identified by their current category of site and their district:

Table 6: Interested in part buy/part rent site accommodation

| Present Accommodation | Housing | Private Site | Public Site | Unauth. Encamp. | Total |
|--------------------------|---------|-----------------|----------------|--------------------|-------|
| Bromsgrove | 3 | 0 | 0 | 0 | 3 |
| Malvern Hills | 3 | 1 | 1 | 0 | 5 |
| Redditch | 0 | 3 | 0 | 0 | 3 |
| Stratford | 0 | 0 | 0 | 1 | 1 |
| Warwick | 0 | 0 | 0 | 0 | 0 |
| Worcester | 0 | 0 | 8 | 0 | 8 |
| Wychavon | 3 | 1 | 14 | 3 | 21 |
| Wyre Forest | 1 | 3 | 11 | 0 | 15 |
| Total Responses | 10 | 8 | 34 | 4 | 56 |

- 6.2.2 The 56 who answered yes to this question represent almost 20% of the number interviewed, and nearly 30% of the total additional requirement.
- 6.2.3 These answers should be taken with some caution, as there is no indication of what such an arrangement might cost, or what it might provide, and therefore no certainty that it would be acceptable. Nevertheless, it suggests that this would be worth pursuing, especially in Wychavon and Wyre Forest Districts where the numbers are quite significant and could create a number of very useful vacancies on publicly owned and managed sites as a result of families moving onto new sites where they would be able to contribute to the cost of provision.

Table 7: Those able to afford to buy and develop their own site

| Present Accommodation | Housing | Private Site | Public Site | Unauth. Encamp. | Total |
|--------------------------|---------|-----------------|----------------|--------------------|-------|
| Bromsgrove | 2 | 1 | 0 | 0 | 3 |
| Malvern Hills | 0 | 4 | 0 | 1 | 5 |
| Redditch | 0 | 2 | 0 | 0 | 2 |
| Stratford | 0 | 0 | 1 | 1 | 2 |
| Warwick | 0 | 0 | 0 | 1 | 1 |
| Worcester | 0 | 0 | 2 | 0 | 2 |
| Wychavon | 2 | 4 | 3 | 0 | 9 |
| Wyre Forest | 2 | 0 | 1 | 0 | 3 |
| Total Responses | 6 | 11 | 7 | 3 | 27 |

6.2.4 A total of 27 answered yes – which is almost 10% of those interviewed, and over 13% of the additional requirement. Just over half the 27 are in Malvern Hills and Wychavon, which have a tradition of facilitating this type of provision. This again represents a significant number who could release pitches on existing sites by acquiring and developing their own sites.

6.3 Travelling

6.3.1 **Question 35** asked whether the interviewee travelled at all or not. Those who answered that they did not travel at all have been identified by their category of site and district. As nil returns may often be due to the family being absent from site because they are travelling, the interviews are likely to overstate the overall position of those who do not travel The answers have therefore been expressed as a percentage of all pitches as well as of those interviewed, and the true position will be somewhere between the two.

Table 8: Those who do not travel at all

| District | Private Site | Public Site | Unauth. Encamp. | Total | % of i/views | % of pitches |
|---------------|-----------------|----------------|--------------------|-------|--------------|--------------|
| Bromsgrove | 2 | 6 | 0 | 8 | 62% | 31% |
| Malvern Hills | 1 | 3 | 0 | 4 | 24% | 9% |
| Redditch | 1 | 0 | 0 | 1 | 17% | 11% |
| Stratford | 4 | 9 | 1 | 14 | 47% | 23% |
| Warwick | 0 | 0 | 0 | 0 | 0% | 0% |
| Worcester | 0 | 9 | 0 | 9 | 45% | 43% |
| Wychavon | 4 | 55 | 1 | 60 | 63% | 41% |
| Wyre Forest | 11 | 19 | 0 | 30 | 62% | 42% |
| Total | 23 | 101 | 2 | 126 | 54% | 33% |
| % of i/views | 46% | 63% | 13% | 54% | | |
| % of pitches | 16% | 51% | 9% | 33% | | |

- 6.3.2 As the true figures for the whole of the Gypsy and Traveller population are likely to be somewhere between the two sets of results, this means that between one third and one half do not travel at all, and that on public sites in general, and on all sites in Wychavon and Wyre Forest, the non-travellers will amount to more than half of the total.
- 6.3.3 These figure are probably much higher than would have been expected, and are clear evidence of the very settled nature of the predominantly Gypsy Traveller population in the study area. The figures will be different for Irish Travellers, who are predominantly moving from one unauthorised encampment to another, and who have been very under-represented in the interview process due to the very large proportion who refused to be interviewed.

6.4 Housing

6.4.1 The assessment has attempted to identify the scale and nature of the mismatch between existing and preferred accommodation with regard to traditional housing. That is, to what extent do those currently in site accommodation wish to be in housing, and vice versa. 59 interviews were completed with Gypsy and Traveller families who had moved into housing - Question 4 asked if they intended to stay in housing:

Table 9: Those not intending to stay in housing

| District | Total | Number not | Number as % of |
|---------------|------------|-----------------|----------------|
| | Number of | intending to | those |
| | interviews | stay in housing | interviewed |
| Bromsgrove | 3 | 3 | 100% |
| Malvern Hills | 13 | 4 | 31% |
| Redditch | 0 | 0 | N/A |
| Stratford | 8 | 4 | 50% |
| Warwick | 0 | 0 | N/A |
| Worcester | 4 | 0 | 0% |
| Wychavon | 17 | 5 | 29% |
| Wyre Forest | 14 | 1 | 7% |
| Total | 59 | 17 | 29% |

- 6.4.2 The 59 households interviewed will not represent the total number of Gypsy and Travellers in housing, and there is no means of estimating what the total might be. However, as 40% (24) of the 59 said they travelled, and as 29% (17) would prefer to be in site accommodation, there is a clear pressure for moves from housing to site pitches that should be reflected in the overall assessment of pitch requirements, and shown as part of Potential Need. It should be noted that in Wyre Forest District the need in this category is negligible, in line with the findings of research commissioned by the District Council in 2006.
- 6.4.3 **Question 20** asked if the interviewee was on a housing waiting list, thus showing the extent to which there is pressure for moves in the opposite direction. Those already in housing are included in the results, but shown separately as an indicator of the extent to which the present housing arrangements were considered to be satisfactory:

Table 10: Those on a housing waiting list, by existing accommodation type.

| District | Housing | Private Site | Public Site | Unauth. Encamp. | Total |
|---------------|---------|-----------------|----------------|--------------------|-------|
| Bromsgrove | 1 | 0 | 3 | 0 | 4 |
| Malvern Hills | 3 | 0 | 1 | 0 | 4 |
| Redditch | 0 | 0 | 0 | 0 | 0 |
| Stratford | 1 | 1 | 1 | 0 | 3 |
| Warwick | 0 | 0 | 0 | 0 | 0 |
| Worcester | 1 | 0 | 3 | 0 | 4 |
| Wychavon | 1 | 0 | 12 | 0 | 13 |
| Wyre Forest | 2 | 4 | 4 | 1 | 11 |
| Total | 9 | 5 | 24 | 1 | 39 |

- 6.4.4 The figure of 9 for those already in housing represents 15% of the total interviewed, which is a high proportion, suggesting that housing solutions are often a compromise. The remaining 30 from those in site accommodation represents almost 13% of the total interviewed and in Wychavon represents a significant level of potential vacancies on public sites that could contribute to meeting the shortfall in provision.
- 6.4.5 **Question 21** asks for the size of housing requested: 15 of the 30 are seeking 3 bedroom accommodation, which is always in short supply, and 3 are seeking 4 or 5 bedroom accommodation where supply is almost non existent, but that still leaves 9 seeking 1 or 2 bedroom accommodation (3 did not answer this question).

6.5 Social Issues

Other issues that were identified through the interview-based research but which do not have a direct impact on the number, type and location of the additional pitch requirement are the subject of a supplementary report prepared by the staff who carried out the interviews. The main points of this report are:

6.5.1 **Health:**

Although very few respondents were actually registered at a doctor's surgery, almost all (95%) said they had easy access to one.

One in ten households had a need for some form of adaptation to improve accessibility.

6.5.2 Harassment and Intimidation:

One in four households had moved as a result of harassment or intimidation, just under half of these had been reported to an official body (usually police or school), and only 40% of those making reports felt they were dealt with satisfactorily.

Most interviewees who responded to this question indicated that those responsible for the harassment or intimidation were "neighbours" or "local people", as opposed to "strangers" or "other groups".

6.5.3 Education:

Only 5% of those with children in school responded that the school was not close to their accommodation.

A breakdown of respondents by site category showed that engagement in education on the unauthorised encampments was almost non-existent, while on council owned sites, on self-owned sites with planning permission and in housing, 87% of households with children of school age were engaging in education – 80% in schools and 7% at home.

However, the knowledge and experience of the interviewers would caution that a significant number of households either not present or not willing to be interviewed contained school age children that were not being educated. The age profile of families as recorded in the interviews would also suggest that the number of children of secondary school age was under-stated, which could mean that school attendance was lower than reported.

7. Conclusion – Key Issues and Requirements

7.1 The recommended number of additional pitches for each district, as set out in Section 5, are summarised below in Table 11:

Table 11: Summary of Additional Pitch Requirement for 2008/13As set out in Appendix 1b – under Adjusted Pitch Requirement

| District | Permanent Pitches | Permanent Showpeople | Temporary Stopping | Total |
|---------------|----------------------|-------------------------|-----------------------|-------|
| | | 'Yards' | Places | |
| Bromsgrove | 0 | 0 | 0 | 0 |
| Malvern Hills | 26 | 8 | 10 | 44 |
| Redditch | 0 | 14 | 18 | 32 |
| Stratford | 34 | 0 | 10 | 44 |
| Warwick | 11 | 0 | 15 | 26 |
| Worcester | 16 | 0 | 20 | 36 |
| Wychavon | 40 | 0 | 20 | 60 |
| Wyre Forest | 30 | 0 | 0 | 30 |
| Sub-Region | 157 | 22 | 93 | 272 |

- 7.2 The requirement for 157 permanent pitches for gypsies and travellers comes from three sources:
 - The present level of overcrowding on approved sites,
 - The small number of permanent unauthorised encampments, and
 - The growth requirement from a largely settled population.

Table 12 shows that, apart from in Bromsgrove District and Redditch Borough, the largely settled population contains a high proportion of families from which household growth can be expected. (There is no settled population in Warwick District).

Table 12: Source of pitch requirements

| District | Over | Unauthorised | Growth | Total |
|---------------|----------|--------------|--------------|-------|
| | crowding | Encampments | Requirements | |
| Bromsgrove | 0 | 0 | 0 | 0 |
| Malvern Hills | 6 | 5 | 15 | 26 |
| Redditch | 0 | 0 | 0 | 0 |
| Stratford | 2 | 15 | 17 | 34 |
| Warwick | 0 | 11 | 0 | 11 |
| Worcester | 1 | 1 | 14 | 16 |
| Wychavon | 6 | 1 | 33 | 40 |
| Wyre Forest | 15 | 1 | 14 | 30 |
| Sub-Region | 30 | 34 | 93 | 157 |

- 7.3 However, almost one third of the provision required is related to the very transient groups of mainly Irish Travellers some predominantly resident within the area as a whole, but many arriving from outside the area for quite short and very infrequent stays. As these do not fit the requirement for permanent Transit Sites, it would be more appropriate to establish Temporary Stopping Places, with a minimum and unobtrusive level of facilities, that could be brought into use as and when required. It must, however, be recognised that some of this provision might subsequently give rise to a more clearly-evidenced need for additional permanent site accommodation.
- 7.4 Accommodation for Travelling Showpeople will normally be acquired and managed privately, so it is recommended that new sites be identified in conjunction with the Showmen's Guild.
- 7.5 Sites for permanent pitches for Gypsy and Traveller families will need to be predominantly on sites that are acquired, managed and developed by local authorities or RSLs, and can receive Government funding.
- 7.6 However, there is a clear preference for smaller sites than have traditionally been provided, and a significant minority have a preference for the type of privately owned and mainly single family sites that have been developed in the past in some districts. There is also the possibility of some of the additional provision being created through a wider range of individual solutions.
- 7.7 It is therefore important that a flexible, responsive and imaginative approach is taken to addressing the identified shortfall in provision, rather than an assumption that 'one size fits all'.
- 7.8 It is also important that a collaborative, rather than individual district approach is adopted to the identification, development and management of additional sites. Much of the requirement would be equally appropriate on one side or the other of local authority boundaries, and it would not be helpful for this to be determined by political or budgetary considerations rather than by suitability of location and site availability.