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**East Lindsey District Council
Gypsy and Traveller Accommodation
Assessment (GTAA)**

**Final Report
March 2023**



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1. Executive Summary

Introduction and Methodology

- 1.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showmen accommodation for East Lindsey District Council (the Council).
- 1.2 As well as updating previous GTAA's, the GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showmen plots for the period 2022 to 2041, to meet the 15-year requirements set out in PPTS, and the period for the new Local Plan. The outcomes of this study supersede the outcomes of any previous GTAA's for East Lindsey District Council.
- 1.3 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showmen population in East Lindsey through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites, yards, and encampments. No interviews or proxy interviews were completed with Gypsies and Travellers living on sites in East Lindsey. One large site with permission for 11 pitches has not yet been developed, and ORS were advised not to visit the other small private site. A total of 9 interviews were completed with Travelling Showmen. A total of 10 stakeholder interviews were also completed.
- 1.4 The fieldwork for the study was completed between April 2022 and May 2022, and the baseline date for the study is May 2022.

Key Findings

- 1.5 Overall, the pitch needs for Gypsies and Travellers for the period 2022-2041 are set out below. Needs are set out for those households that met the planning definition of a Gypsy or Traveller; for any undetermined households¹ where an interview was not able to be completed due to households not being present despite up to three visits to each site who may meet the planning definition; and for those households that did not meet the planning definition – although this is no longer a requirement for a GTAA.
- 1.6 Only the need from those households who meet the planning definition and from those from undetermined households who subsequently demonstrate that they meet it should be formally considered as need arising from the GTAA. The need arising from households that meet the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate.

¹See Paragraph 3.28 for further information on undetermined households.

- 1.7 The Council will need to carefully consider how to address any need associated with undetermined Travellers as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.
- 1.8 In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies. This approach is specifically referenced in the National Planning Policy Framework (NPPF) 2021. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 62 then states that [emphasis added] *‘Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*
- 1.9 The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showmen. Whilst the findings in this report are aggregated totals for the whole of East Lindsey due to data protection issues, the Council have more detailed data to support the preparation of any future Local Plan Policies.

Pitch Needs – Gypsies and Travellers

- 1.10 There were no Gypsy or Traveller households identified in East Lindsey that met the planning definition; 3 undetermined households that may meet the planning definition; and no households that did not meet the planning definition.
- 1.11 There is **no need for pitches for households that met the planning definition**. Whilst there is a private site with planning permission for 11 pitches at Brackenfreya Woods, and a private transit site with planning permission for 18 pitches at Orby Road, both of these sites have not yet been developed.
- 1.12 There is a need **for 1 pitch for undetermined households**. This is as a result of new household formation over the GTAA period.
- 1.13 The **no need for any pitches for households that did not meet the planning definition** as none were identified.

Plot Needs - Travelling Showmen

- 1.14 There were 12 Travelling Showmen households identified in East Lindsey that met the planning definition; no undetermined households that may meet the planning definition; and no households that did not meet the planning definition.

- 1.15 There is a need for **7 plots for households that met the planning definition**. This is made up of 1 movement from bricks and mortar, 2 teenagers who will be in need of a plot of their own in the next 5 years, 2 from in-migration, and 2 from new household formation, derived from the household demographics.
- 1.16 There is **no need for pitches for undetermined households** as none were identified in East Lindsey.
- 1.17 There is **no need for households that did not meet the planning definition** as none were identified in East Lindsey.

Transit Recommendations

- 1.18 Due to historic low numbers of unauthorised encampments it is not recommended that there is a need for a formal public transit site in East Lindsey at this time. There is also a private transit site with permission for 18 pitches that has not yet been developed.
- 1.19 The situation relating to levels of unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 1.20 It is recommended that the review of the evidence base relating to unauthorised encampments should be completed on a Lincolnshire-wide basis. This will establish whether there is a need for investment in any further transit provision or emergency stopping places, potential locations to provide transit provision, or whether a managed approach is preferable.
- 1.21 In the short-term the Council should continue to use its current approaches when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- 1.22 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 1.23 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; porta-loos; sewerage disposal point and refuse disposal facilities.

2. Introduction

- 2.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showmen accommodation in East Lindsey District Council. The outcomes of the study will supersede the outcomes of the previous Gypsy, Traveller and Travelling Showmen Accommodation Needs Assessment completed in East Lindsey District Council.
- 2.2 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showmen under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act (2016), the NPPF (2021), and the Planning Practice Guidance (PPG) 2021.
- 2.3 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showmen accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of Traveller pitches and plots covering the period 2022 to 2041 to meet the 15-year requirements of the PPTS, and the new Local Plan period. As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- 2.4 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showmen, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showmen) Accommodation Assessment (GTAA).
- 2.5 The baseline date for the study is May 2022 which was when the fieldwork was completed.

Definitions

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

The Planning Definition in PPTS (2015)

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

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

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

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

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

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

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

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

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

Definition of Travelling

- 2.9 One of the most important questions that GTAAs need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested, among other things, the meaning of the term ‘*nomadic*’.
- 2.10 **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 2.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold, and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 2.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 2.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for their elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought a judicial review of the local authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- 2.14 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling, and was taking a course that led to permanent local employment.
- 2.15 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- 2.16 The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as holidays and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- 2.17 It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependants with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- 2.18 Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled for work in the past. In addition, households will also have to demonstrate that they plan to travel again for work in the future.
- 2.19 This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

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

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

Legislation and Guidance for Gypsies and Travellers

- 2.21 Decision-making for policy concerning Gypsies, Travellers and Travelling Showmen sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showmen:

- » The Housing Act, 1985
- » Planning Policy for Traveller Sites (PPTS), 2015
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2021
- » Planning Practice Guidance² (PPG), 2021

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

- 2.23 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showmen is set out in the PPTS (2015). It should be read in conjunction with the NPPF (2021). In addition, the Housing and Planning Act (2016) makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showmen households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2015

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

- » *Local planning authorities should make their own assessment of need for the purposes of planning.*
- » *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.*
- » *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- » *That plan-making and decision-taking should protect Green Belt from inappropriate development.*

²With particular reference to the sections on *Housing needs of different groups* (May 2021).

- » *To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.*
- » *That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.*
- » *For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.*
- » *To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.*
- » *To reduce tensions between settled and Traveller communities in plan-making and planning decisions.*
- » *To enable provision of suitable accommodation from which Travellers can access education, health, welfare, and employment infrastructure.*
- » *For local planning authorities to have due regard to the protection of local amenity and local environment.*

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

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

2.26 PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:

- » *Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*
- » *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
- » *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty-to-Cooperate on strategic planning issues that cross administrative boundaries).*
- » *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.*
- » *Protect local amenity and environment.*

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

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

National Planning Policy Framework (NPPF) 2021

- 2.28 The most recent version of the revised National Planning Policy Framework was issued in July 2021. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.
- 2.29 Paragraph 62 then states that [emphasis added] *‘Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*
- 2.30 This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.
- 2.31 In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (APP/P0240/C/18/3213822) the Inspector concluded in relation to the then Paragraph 61 (now Paragraph 62) of the NPPF that:

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

Levelling-up and Regeneration Bill (2022)

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

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

- 2.33 In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.

- 2.34 Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it has not been quashed or declared unlawful at this time.
- 2.35 It is too early to properly identify the impact that the judgement will have on an assessment of need for Travellers. However, the approach taken by ORS does include an assessment of need for all Travellers, and should any changes be made to the PPTS planning definition of a Traveller, the outcomes of the GTAA can be amended accordingly.

3. Methodology

Background

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

Glossary of Terms/Acronyms

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

Desk-Based Review

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

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

Stakeholder Engagement

3.9 Engagement was undertaken with key Council Officers from East Lindsey through telephone interviews. A total of 3 interviews were completed with Council Officers from the study area.

Working Collaboratively with Neighbouring Planning Authorities

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

- » Boston Borough Council
- » Lincoln City Council
- » Lincolnshire County Council
- » North East Lincolnshire
- » South Holland District Council
- » North Kesteven District Council
- » West Lindsey District Council

Survey of Travelling Communities

3.11 A 2-stage methodology was used to complete the site and yard fieldwork.

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

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

Stage 1 – Telephone Interviews (April 2022)

- 3.19 The first phase of the fieldwork involved Researchers from ORS attempting to complete interviews over the telephone with residents living on sites and yards.
- 3.20 Contact details were sought through local stakeholders including site owners and site managers; by contacting planning agents known to operate in the local area; and by sending letters to residents asking them to contact ORS to complete an interview – including follow-up letters. The wording of the letter that ORS currently use has been agreed with members of the Travelling Community and asks households to call ORS Researchers to complete an interview over the telephone. During interviews ORS Researchers also asked households if they had family or friends living on sites in the area and asked them to pass on our contact details and to encourage them to call us.

Stage 2 – Face-to-Face Engagement (May 2022)

- 3.21 When the initial phase of telephone interviews had been completed, ORS sought to complete face-to-face engagement with households on sites and yards where it had not been possible to complete interviews over the telephone.

Engagement with Bricks and Mortar Households

- 3.22 The 2011 Census recorded just 24 households that identified as either Gypsies or Irish Travellers who lived in a house or bungalow in East Lindsey and 2 who lived in a flat or maisonette.
- 3.23 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; information from housing registers; and other local knowledge from stakeholders. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- 3.24 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity put in place.

Timing of the Fieldwork

- 3.25 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also to avoid days of known local or national events. The fieldwork was completed between April 2022 and May 2022 and Researchers were able to collect information on the majority of residents living on sites and yards.

Applying the Planning Definition

- 3.26 The primary change to PPTS (2015) in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. The revised PPTS was issued in 2015 and a number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.19 and 2.20 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age.
- 3.27 The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:

- » Whether any household members have travelled in the past 12 months.
- » Whether household members have ever travelled.
- » The reasons for travelling.
- » Where household members travelled to.
- » The times of the year that household members travelled.
- » Where household members stay when they are away travelling.
- » When household members stopped travelling.
- » The reasons why household members stopped travelling.
- » Whether household members intend to travel again in the future.
- » When and the reasons why household members plan to travel again in the future.

3.28 When the household interviews were completed, the answers from the questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showmen as to Gypsies and Travellers.

3.29 Households that need to be formally considered in the GTAA fall under one of three classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:

- » Households that travel under the planning definition.
- » Households that have ceased to travel temporarily under the planning definition.
- » Households where an interview was not possible who may fall under the planning definition.

3.30 Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Council with components of need to consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the NPPF (2021).

Undetermined Households

3.31 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be assessed as part of the GTAA where they are believed to be Gypsies and Travellers who may meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed; an approach has been taken that seeks an estimate of potential need from these households. This will be an additional need figure over and above the need identified for households that meet the planning definition.

- 3.32 The estimate seeks to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. As the demographics of any undetermined households are unknown, the ORS national household formation rate of 1.50% has been used.
- 3.33 Should further information be made available to the Council that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or through wider assessments of housing need.
- 3.34 ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- 3.35 However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall, approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showmen based on over 400 interviews that have been completed) – and in some local authorities, no households meet the planning definition.
- 3.36 ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on approximately 35% of them at a representative range of sites. Approximately 30% meet the planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.
- 3.37 This would also suggest that it is likely that only a proportion of the potential need identified from undetermined households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through separate Local Plan Policies.
- 3.38 The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:

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

Households that Do Not Meet the Planning Definition

- 3.39 Households who do not travel for work now fall outside of the planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance³ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the NPPF (2021).
- 3.40 Paragraph 62 of the NPPF states that [emphasis added] *‘Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*

Calculating Current and Future Need

- 3.41 To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- 3.42 The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:
- » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within 5 years.
 - » Pitches vacated by people moving to housing.
 - » Pitches vacated by people moving from the study area (out-migration).

³ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

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

Current Need

- 3.44 The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:
- » Households on unauthorised developments for which planning permission is not expected.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Households in bricks and mortar *needing* to move to sites.
 - » Households in *need* on waiting lists for public sites.

Future Need

- 3.45 The final stage was to identify components of future need. This includes the following four components:
- » Teenage children in need of a pitch of their own in the next 5 years.
 - » Households living on sites with temporary planning permission.
 - » New household formation.
 - » In-migration/roadside.
- 3.46 Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.
- 3.47 ORS are also increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them *displaced in-migration*.
- 3.48 All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showmen. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showmen are identified separately and the needs are to 2041.

Pitch Turnover

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

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

3.50 In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers⁴ produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

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

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

Transit Provision

3.52 GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.

⁴ See www.londongypsiesandtravellers.org.uk/resources/ for details.

- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.
- 3.53 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.
- 3.54 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.
- 3.55 Another alternative is ‘negotiated stopping’. The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- 3.56 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- 3.57 The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- 3.58 Consideration will also have to be given to the Police, Crime, Sentencing and Courts Act which came in to force on 28 June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.
- 3.59 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Department for Levelling Up, Housing and Communities (DLUHC)⁵ Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

⁵ Formerly the Ministry for Housing, Communities and Local Government (MHCLG).

4. Gypsy, Traveller & Travelling Showmen Sites & Population

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showmen. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁶. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showmen, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showmen. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showmen are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.3 The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showmen. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showmen yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showmen population also has other types of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showmen whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.

⁶ Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards in East Lindsey

- 4.6 In East Lindsey, at the base date for the GTAA, there were no public Gypsy and Traveller sites; 1 privately owned site with permanent planning permission (11 pitches); no sites with temporary planning permission; 1 site that is tolerated for planning purposes (3 pitches); no unauthorised sites; 6 authorised Travelling Showmen yards (14 plots); and 1 tolerated Travelling Showmen's yard (1 plot). There is also a private transit site that has planning permission for 18 pitches. See **Appendix B** for further details.
- 4.7 The privately owned site with permanent planning permission has not yet been developed, and the private transit site has also not yet been developed. It is understood that both sites are speculative at present and have not been granted planning permission to meet a locally identified need. It was advised that ORS should not visit the other small tolerated site.

Figure 1 - Total amount of provision in East Lindsey May 2022

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private sites with permanent planning permission	1	11
Private sites with temporary planning permission	0	0
Tolerated sites	1	3
Unauthorised sites	0	0
Private transit sites	1	18
Travelling Showmen yards (authorised)	6	14
Travelling Showmen yards (tolerated)	1	1
TOTAL	10	47

DLUHC Traveller Caravan Count

- 4.8 Another source of information available on the Gypsy, Traveller and Travelling Showmen population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to DLUHC. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, the Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showmen caravans.

- 4.9 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.

5. Stakeholder Engagement

Introduction

- 5.1 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- 5.2 The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 5.3 A total of 3 interviews were undertaken with Council Officers from the study area.
- 5.4 As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 6 neighbouring local authorities, as well as an Officer from Lincolnshire County Council:
- » Boston Borough Council
 - » Lincoln City Council
 - » Lincolnshire County Council
 - » North East Lincolnshire
 - » South Holland District Council
 - » North Kesteven District Council
 - » West Lindsey District Council
- 5.5 Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

Views of Key Stakeholders and Council Officers in East Lindsey

Accommodation Needs

- 5.6 At this present moment there are no allocated sites for Gypsy, Travellers or Traveling Showmen to go to within the East Lindsey District, whether to stay for an extended duration or as a short-term visitor.
- 5.7 The Council is aware of unauthorised encampments; however they are unable to provide a permanent location for these residents. Furthermore, The Council are aware of overcrowding/concealed households on some of the Showmen's yards.
- 5.8 The Council are only aware of one family within a Bricks and Mortar household who have opted to remain in Bricks and Mortar and have no interest in moving to a site.

- 5.9 The Council are unaware of any means of contact that could be used to contact further families that live in Bricks and Mortar households.
- 5.10 There is a limited evidence base on Gypsies, Travellers and Travelling Showmen due to the fact that transit in the district has been seasonal and the native population is limited.

Short-term Encampments and Transit Provision

- 5.11 The Council is aware of short-term encampments that occur within the district and confirms that the Travellers are normally in the district for a holiday or to work.
- 5.12 The stopping places regularly favoured by Travellers are commonly car parks, due to the fact they have toilets, showers and a water supply. Leisure centres are regularly favoured for the same reasons.
- 5.13 Former industrial estates within the district have been favoured, however these locations have increased security with measures such as installing barriers. As a result of this the households that frequent these industrial estates are having to seek alternative locations.
- 5.14 The Council acknowledge that encampments are a problem, and that consideration could be given to meeting short-term need in the form of stopping places.
- 5.15 The Council have approved a private transit site in Mablethorpe for 18 pitches, however this has not yet been developed.
- 5.16 The Council has confirmed that the short-term encampments that frequent Mablethorpe on a seasonal basis, mostly include large extended families, are having an impact on the town.

Cross Border Issues

- 5.17 The Council are unaware of any cross-border issues related to the neighbouring local authorities.
- 5.18 Similar to East Lindsey, the neighbouring local authorities do not have any transit provision for the travellers. When these neighbouring authorities take action against the unauthorised encampments, households are forced to move to another neighbouring district.
- 5.19 East Lindsey District Council have confirmed to be joint working with Boston and North-East Lincolnshire.
- 5.20 East Lindsey District Council confirms that they are compliant with Duty to Cooperate as and when a request is raised. The Council confirms that they work well with their neighbours on the matters at hand.

Future Priorities and Any Further Issues

- 5.21 East Lindsey District Council believes they should be considering having stopping places within the district.

- 5.22 The Council was aware of and in contact with a large family that were unable to find a permanent pitch. The Council was unable to accommodate them permanently through the winter due to the risk of floods, however the household in question was happy to settle from Spring until Autumn, by which time they would move on. However, more recently the Council have not been able to make contact with the family.

Neighbouring Authorities

Boston Borough Council

- 5.23 With regard to **overall accommodation need** across Boston, the views of the officer interviewed were as follows:

- » The Officer confirmed that there is no need for transit provision within the borough.
- » The Officer confirmed that there were no authorised transit sites within the borough.
- » The Officer confirmed that at the time of interview there was a pending application for a site with 14 pitches, however this is currently undetermined.
- » The Officer interviewed believed that current provisions meet the need in the borough.
- » Due to the presence of two vacant pitches no allocations were made in the borough.

- 5.24 With regard to the subject of **cross border issues**, the views of the officer interviewed were as follows:

- » The Officer interviewed confirmed there was no evidence of migration and cross border issues with neighbouring authorities.
- » The Officer interviewed confirmed that a County Planning Officers Forum takes place to discuss a broad spectrum of development topics and are not specific to Gypsies, Travellers and Travelling Showmen.
- » The Officer confirmed that Boston Borough will require a housing need update, which will include the needs of Gypsies and Travellers and Travelling Showmen, as their last Local Plan was adopted 4 years ago.

Lincoln City Council

- 5.25 With regard to **overall accommodation need** across Lincoln City, the views of the officer interviewed were as follows:

- » City of Lincoln Council considers its accommodation to be adequate within the district, based on the previous GTAA.
- » The City of Lincoln annually experiences a small number of unauthorised encampments. Frequent locations for unauthorised encampments tend to be places such as carparks.

- » The Officer confirmed that there are no local authority sites, permanent, or transit sites in the City of Lincoln.
- » A further comment made by the Officer interviewed was that in future they would like to consider the need for negotiated stopping to ease the pressures caused by unauthorised encampments on public land.

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

- » The Officer confirmed they were not aware of any cross-border Issues.
- » Central Lincolnshire authorities will proactively plan for development together. City of Lincoln confirms it is complying with Duty to Cooperate, particularly in relation to the Central Lincolnshire Local Plan and its partner authorities. The officer interviewed did not have any data to confirm or deny that neighbouring Boroughs are complying with Duty to Cooperate.

Lincolnshire County Council

5.27 With regard to **overall accommodation need** across Lincolnshire, the views of the officer interviewed were as follows:

- » The Officer Interviewed confirmed that none of the sites in the districts are owned by the District Councils. This includes both residential sites and transit sites.
- » The Officer confirmed that the sites within the county that are accommodating Travelling Showmen are mainly seasonal, due to the coastal nature of the county. The accommodation in question is unlike a Showmen Yard where they are able to work on their equipment, it is purely for living accommodation.
- » The Officer interviewed, confirms there is a pitch for Travelling Showmen in the East Lindsey District, to reside in the winter months, outside of the travelling season.
- » The Officer confirmed that certain car parks within the East Lindsey District that were frequented by Gypsies and Travellers now had preventative measures put in place such as barriers. In addition to this they confirmed that fields more commonly used for sports such as football and cricket had had posts put up to prevent access. Both instances of prevention were successful.
- » The Officer Interviewed believes that East Lindsey District Council should be focused on temporary provision as a priority for the future. The Officer believes that lack of temporary provision is causing major problems to the rest of the community.

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

- » The Officer confirmed the Council had liaised with transient groups in Lincolnshire County. The general consensus among the groups in question was that a large grassy area would be preferred to a traditional transit site.

- » Lincolnshire County Council suggests that transit sites in the county should be on main travelling areas or main travelling routes due to the wants of the travellers. On this, Lincolnshire County Council suggests that Skegness would be the preferred location in East Lindsey for a transit site.
- » The County is unaware of any issues with Duty to Cooperate.

North East Lincolnshire Council

5.29 With regard to **overall accommodation need** across North East Lincolnshire, the views of the officer interviewed were as follows:

- » Since the last GTAA, North-East Lincolnshire District Council considered revising their approach to establish a transit site with regards to Gypsies and Travellers. The Council then sought to revise this approach to adopt a more tolerated approach, this was backed by evidence from their latest assessment. The Council is hoping to prioritise how this tolerated approach will work in practice and is awaiting final Cabinet decisions.
- » Since the last GTAA, there has been no update to the needs of Travelling Showmen due to there being no specific needs identified.
- » The Officer interviewed confirmed there are two adjacent private sites at Habrough that fully meets the needs of Gypsies and Travellers within the area.
- » The Officer interviewed confirmed there are a small number of short-term unauthorised encampments. However, the need of permanent sites is met, and the incidents of unauthorised encampments are infrequent.

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

- » The Officer interviewed confirmed they are unaware of any cross-border issues with neighbouring local authorities and noted there were no signs of pressure affecting the district.
- » The Officer confirmed that they are complying with Duty to Cooperate and have communicated, where necessary, with neighbouring districts about their approach to transit provisions.

North Kesteven District Council

5.31 With regard to **overall accommodation need** across North Kesteven, the views of the officer interviewed were as follows:

- » Since the last GTAA, North Kesteven District Council has granted planning permission for two additional pitches for Gypsies and Travellers.
- » Since the last GTAA, there have been no planning permissions granted, nor have there been sites allocated for Traveling Showmen.
- » North Kesteven District Council considers its accommodation to be adequate within the district, based on the previous GTAA.
- » A further comment made by the Officer interviewed was that in future they would like to consider the need for negotiated stopping to ease the pressures caused by unauthorised encampments on public land.

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

- » Some sites within North Kesteven District that are close to the boundaries of neighbouring authorities (South Kesteven, Newark and Sherwood, City of Lincoln) are favoured for unauthorised encampments. There is an unauthorised planning site within a kilometre of the border with Newark and Sherwood, a district that has strong ties to the Gypsies and Travellers communities and multiple large sites.
- » Central Lincolnshire authorities will proactively plan for development together. North Kesteven confirms it is complying with Duty to Cooperate, particularly in relation to the Central Lincolnshire Local Plan and its partner authorities.

West Lindsey District Council

5.33 With regard to **overall accommodation need** in West Lindsey, the views of the officer interviewed were as follows:

- » Since the last GTAA, West Lindsey has increased the total provision for Gypsies and Travellers in the district, which includes new permanent pitches and new transit provision. The Council has also granted planning permission for a 6-plot Travelling Showmen yard. This yard is in the process of being developed and will address all the accommodation need identified by the 2020 GTAA.
- » Based on the assessment of need and the PPTS definition, it is considered there is an unmet need of 27 pitches over the plan period to 2040 in West Lindsey. With 5 pitches being required within the next 5yrs.
- » The 2020 GTAA found that there is a lack of transit facilities within the county of Lincolnshire to which agencies can direct Gypsy and Traveller households residing on unauthorised encampments.

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

- » There are no cross-border issues in relation to migration, however, the lack of transit sites or tolerated stopping places within the County impacts on all authorities when Travellers are moved on.
- » There is general recognition within the 2020 GTAA that there is a shortage of allocations within Local Planning Policies across the County, and that most rely on windfall sites to meet need.
- » There has been some discussion around joint working and better collaboration in relation to Gypsy and Traveller provision, specifically transit sites and tolerated stopping places, however this aspect of work falls outside the specific requirements for need in terms of planning policy and as such is being considered by Lincolnshire County Council.

6. Survey of Travelling Communities

Interviews with Gypsies and Travellers

- 6.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- 6.2 In East Lindsey, at the base date for the GTAA, there were no public Gypsy and Traveller sites; 1 privately owned site with permanent planning permission; no sites with temporary planning permission; 1 site that are tolerated for planning purposes; no unauthorised sites; 6 authorised Travelling Showmen yards; 1 tolerated Showmen’s yard; no unauthorised Travelling Showmen yards; and 1 private transit site. There were no public transit sites identified. See **Appendix B** for further details.
- 6.3 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 2 – Sites and yards visited in East Lindsey

Site Status	Pitches/Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
None	-	-	-
Private Sites			
Brackenfreya Woods, Louth	11	0	11 x not yet built
Tolerated Sites			
Lock Road, Alvingham	3	0	Advised not to visit
Unauthorised Sites			
None	-	-	-
Private Transit Sites			
Land at Corner of Orby Road and Burgh Le Marsh Bypass	18	0	18 x not yet built
TSP - Authorised			
Barn and Paddock, Stickney	1	0	1 x vacant
Barn House, Frithville	2	0	2 x vacant
Land off Bar Green Lane, Stickney	1	1	-
Land south of New Lane, Toynton St. Peter (Circus Mondeo)	3	3	-
The Delph, Eastville	4	1	3 x vacant
Water Tower Showmans Caravan Site, Mablethorpe	3	3	-
TSP - Tolerated			
Land at Brickyard Lane, Trusthorpe (Russells Circus)	1	1	-
TOTAL	47	9	

Interviews with Gypsies and Travellers in Bricks and Mortar

- ^{6.4} Following all of the efforts that were made it was possible to identify one household living in bricks and mortar to interview.

7. Current and Future Pitch Provision

Introduction

- 7.1 This section focuses on the pitch provision which is needed in the study area currently and to 2041. This includes both current unmet need and need which is likely to arise in the future⁷. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 7.2 We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 7.3 This section concentrates not only upon the total provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- 7.4 Nationally, a household formation and growth rate of 3.00% net per annum⁸ has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for pitches unrealistically. In this context, ORS prepared a *Technical Note on Gypsy and Traveller Household Formation and Growth Rates* in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix D**.
- 7.5 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 7.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

⁷ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

⁸ Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

7.7 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showmen) and this has also been adjusted locally based on site demographics.

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

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

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

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

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

- 7.11 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 7.12 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence is usually used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status).
- 7.13 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- 7.14 The latter approach has been applied in East Lindsey for the following reasons:
- » Travelling Showmen households that meet the planning definition: Low numbers of children.
- 7.15 In addition, the ORS national rate of 1.50% has been used to estimate growth for undetermined Travellers, based on the best available national evidence due to lack of local demographic evidence for undetermined Traveller households.
- 7.16 New household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

Breakdown by 5 Year Bands

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

Applying the Planning Definition

- 7.18 The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition or those who demonstrated that they have ceased to travel temporarily (due to education, ill health, or old age) form the components of need in the GTAA that will need to be addressed through a Gypsy and Traveller Local Plan Policy. In addition, households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning definition has also been assessed to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 7.19 The information used to assess households against the planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. The table below sets out the planning status of households that were interviewed for the East Lindsey GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults and accepted in-migration.

Figure 3 – Planning status of households in East Lindsey

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	0	0	0
Private Sites	0	0	0
Tolerated Sites	0	0	3
Unauthorised Sites	0	0	0
Sub-Total	0	0	3
Travelling Showmen			
TSP – Private Yards	8	0	0
TSP – Tolerated Yards	1	0	0
TSP – Bricks and Mortar	1	0	0
TSP – In-Migration	2	0	0
Sub-Total	12	0	0
TOTAL	12	0	3

- 7.20 Figure 3 shows that for Gypsies and Travellers in East Lindsey, no households met the planning definition of a Traveller, and 12 Travelling Showmen households met the definition in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily.
- 7.21 No Gypsy and Traveller households or Travelling Showmen households did not meet the planning definition as they were not able to demonstrate that they travel away from their usual place of

residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health, or old age.

- 7.22 It was not possible to make contact with 3 Gypsy and Traveller households during the fieldwork period as ORS were instructed by the Council not to visit one private site. These households are recorded as Undetermined for the purposes of the GTAA.

Interviews with Gypsies and Travellers in Bricks and Mortar

- 7.23 Following all of the efforts that were made it was possible to identify and interview one Travelling Showmen household living in bricks and mortar. This household met the planning definition of a Traveller.

Migration/Roadside

- 7.24 The study has also sought to address in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.
- 7.25 The study also sought to identify any need from households who have been forced to move from sites due to overcrowding and who are currently living on the roadside or on sites in other local authorities – and who have strong family links with households in East Lindsey. These are referred to as roadside households or displaced in-migration.
- 7.26 In addition, as a result of COVID-19, the study sought to identify any households that had been displaced from their usual place of residence due to lockdown restrictions who were currently located in East Lindsey.
- 7.27 Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified 2 households living in other local authorities with a need to move to a Showmen’s yard in East Lindsey.
- 7.28 ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to East Lindsey. Therefore, apart from the 2 households set out above, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- 7.29 It is important to note that any applications for new sites or additional pitches as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

Pitch Needs – Gypsies and Travellers that met the Planning Definition

7.30 Analysis of the household interviews indicated that there is **no need** for those households who met the planning definition of a Gypsy or Traveller in East Lindsey over the GTAA period.

Pitch Needs – Undetermined Gypsies and Travellers

7.31 There is need for **1 pitch for undetermined households**. This is a result of future household formation.

Pitch Needs – Gypsies and Travellers that did not meet the Planning Definition

7.32 Analysis of the household interviews indicated that there is **no need** for those households who did not meet the planning definition of a Gypsy or Traveller in East Lindsey over the GTAA period.

Figure 4 – Need for Gypsy and Traveller households in East Lindsey that met the Planning Definition (2022-41)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5-year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	0
<i>(No households meeting planning definition)</i>	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 5 – Need for Gypsy and Traveller households in East Lindsey that met the Planning Definition by year periods

Years	0-5	6-10	11-15	16-20	Total
	2022-26	2027-31	2032-36	2037-41	
	0	0	0	0	0

Travelling Showmen Needs

Plot Needs – Travelling Showmen

- 7.33 There were 12 Travelling Showmen households identified in East Lindsey that met the planning definition; no undetermined households that may meet the planning definition; and no households that did not meet the planning definition.
- 7.34 There is a need for **7 plots** for households that met the planning definition. This is made up of 1 movement from bricks and mortar, 2 teenagers who will be in need of a plot of their own in the next 5 years, 2 from in-migration, and 2 from new household formation, derived from the household demographics.

Figure 6 – Need for Travelling Showmen households in East Lindsey that met the Planning Definition (2022-41)

Travelling Showmen - Meeting Planning Definition	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	1
Households on waiting lists for public yards	0
Total Current Need	1
Future Need	
5-year need from teenage children	2
Households on yards with temporary planning permission	0
In-migration	2
New household formation	2
<i>(Formation from demographics)</i>	
Total Future Needs	5
Net Plot Need = (Current and Future Need – Total Supply)	7

Figure 7 – Need for Travelling Showmen households in East Lindsey that met the Planning Definition by year periods

Years	0-5	6-10	11-15	16-20	Total
	2022-26	2027-31	2032-36	2037-41	
	5	1	0	1	7

- 7.35 There is **no need** for plots for undetermined households, and there is **no need** for plots for households that did not meet the planning definition as none were identified.

Transit Requirements

- 7.36 When determining the potential need for transit provision the assessment has looked at data from the DLUHC Traveller Caravan Count, the outcomes of the stakeholder interviews and records on numbers of unauthorised encampments.

DLUHC Traveller Caravan Count

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

Stakeholder Interviews and Local Data

- 7.39 There is one private transit site in East Lindsey for planning permission for 18 pitches. The site has not yet been developed.
- 7.40 The Council record instances of unauthorised encampments in East Lindsey. During 2019 there were 10 recorded encampments, with the majority being in Skegness and Mablethorpe. In 2020, although possibly affected by COVID-19 travel restrictions, there 12 recorded encampments, again with the majority being in Skegness and Mablethorpe.
- 7.41 Interviews with Council Officers confirmed that the majority of recorded encampments are short-term and transient and are as a result of Travellers visiting the district for work or holidays. They also confirmed that increased security measures have been put in place in a number of locations favoured by Travellers for short-term stopping.
- 7.42 It was the view of Officers that the Council should give consideration to the provision of short-term stopping places, particularly in those areas where encampments are most common.

Transit Recommendations

- 7.43 Due to historic low numbers of unauthorised encampments it is not recommended that there is a need for a formal public transit site in East Lindsey at this time. There is also a private transit site with permission for 18 pitches that has not yet been developed.

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

8. Conclusions

8.1 This study provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showmen under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, the NPPF (2021), and PPG (2021). It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

8.2 In summary there is a need for:

- » No pitches in East Lindsey over the GTAA period to 2041 for Gypsy and Traveller households that met the planning definition.
- » One pitch for undetermined Gypsy and Traveller households that may meet the planning definition.
- » No pitches for Gypsy and Traveller households who did not meet the planning definition.

8.3 It is recommended that need for undetermined households could be met through the intensification of use of the existing private site.

8.4 The Council will also need to carefully consider how to address any needs from households seeking to move to East Lindsey (in-migration), or from any households currently living in bricks and mortar who may wish to move to a site. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS).

8.5 Regarding any future need from households that do not meet the planning definition, in general terms, it is the Government's intention that any need for households who do not fall within the PPTS planning definition should be met as part of general housing need, and through separate Local Plan Policies.

8.6 The GTAA also identified a privately owned site with permanent planning permission for 11 pitches that has not been developed. It is understood that this site is speculative at present and have not been granted planning permission to meet a locally identified need.

8.7 It is recognised that the Council is in the process of preparing a new Local Plan that sets out overall housing need. The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies and Travellers. Whilst the findings in this report are aggregated totals for the whole of East Lindsey due to data protection issues, the Council have more detailed data to support the preparation of new Local Plan Policies.

Travelling Showmen

8.8 In summary there is a need for:

- » 7 plots in East Lindsey over the GTAA period to 2041 for Travelling Showmen households that met the planning definition.
- » No plots for undetermined Travelling Showmen households that may meet the planning definition.
- » No plots for Travelling Showmen households who did not meet the planning definition.

8.9 It is recommended that need for Travelling Showmen households could be met through the intensification of use of existing private yards. It should also be noted that there are a number of vacant yards in East Lindsey.

Transit Provision

8.10 Due to historic low numbers of unauthorised encampments it is not recommended that there is a need for a formal public transit site in East Lindsey at this time. There is also a private transit site with permission for 18 pitches that has not yet been developed. It is also understood that this site is speculative and was not granted planning permission to meet a locally identified need for transit pitches.

8.11 It is recommended that the review of the evidence base relating to unauthorised encampments should be completed on a Lincolnshire-wide basis. This will establish whether there is a need for investment in any further transit provision or emergency stopping places, potential locations to provide transit provision, or whether a managed approach is preferable.

8.12 In the short-term the Council should continue to use its current approaches when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

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Appendix A: Glossary of Terms / Acronyms used

Amenity block	A building where basic plumbing amenities (bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Concealed household	Households, living within other households, who are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Household formation	The process where individuals form separate households. This is normally through adult children setting up their own household.
In-migration	Movement of households into a region or community
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showmen.
Out-migration	Movement from one region or community in order to settle in another.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showmen yards.
Private site	An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

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

GTAA	Gypsy and Traveller Accommodation Assessment
LPA	Local Planning Authority
DLUHC	Department of Levelling Up, Housing and Communities
MATU	Multi Agency Traveller Unit
NPPF	National Planning Policy Framework
ORS	Opinion Research Services
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
TSP	Travelling Showmen

Appendix B: Site and Yard List (May 2022)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public Sites		
None	-	-
Private Sites with Permanent Permission		
Brackenfreya Woods, Louth	11	-
Tolerated Sites		
Lock Road, Alvingham	3	-
Private Transit Sites		
Land at Corner of Orby Road and Burgh Le Marsh Bypass	18	-
TOTAL PITCHES	32	0
Travelling Showmen Yards - Authorised		
Barn and Paddock, Stickney	1	-
Barn House, Frithville	2	-
Land off Bar Green Lane, Stickney	1	-
Land south of New Lane, Toynton St. Peter (Circus Mondeo)	3	-
The Delph, Eastville	4	-
Water Town Showmans Caravan Site, Mablethorpe	3	-
Travelling Showmen Yards - Tolerated		
Land at Brickyard Lane, Trusthorpe (Russells Circus)	1	-
TOTAL PLOTS	15	0
TOTAL	47	0

Appendix C: Household Interview Questions

GTAA Questionnaire 2019



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

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

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

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

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

A General Information

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

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

Yes No

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

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

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

Choice No option

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

Yes No

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

1 2 3 4 5 6 7 8 9 10

B Demographics

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

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

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

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

C Accommodation Needs

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

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1 2 3 4 5 6 7 8 9 10

Other Please specify

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

1 2 3 4 5 6 7 8 9 10

Other *Please specify*

Details (Please specify)

D **Waiting List**

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

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

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

1 2 3 4 5 6 7 8 9 10

Other *(Please specify)*

Details (Please specify)

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

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

Other *(Please specify)*

Details (Please specify)

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

1 2 3 4 5 6 7 8 9 10

No Other *(Please specify)*

Details (Please specify) and take contact details)

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

F Travelling

F1 How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months?
INTERVIEWER: Please cross one box only

0 1 2 3 4 5+

↓ Go to F6a } Continue to F2

F2 If you or members of your family have travelled in the last 12 months, which family members travelled? *INTERVIEWER: Please cross one box only*

All the family Adult males Other If other, please specify

F3 What were the reasons for travelling? *INTERVIEWER: Please cross all that apply*

Work Holidays Visiting family Fairs Other

Details / specify if necessary. If fairs—probe for whether this involves work

F4 At what time of year do you or family members usually travel? And for how long?
INTERVIEWER: Please cross one box only

All year Summer Winter

And for how long?

F5 Where do you or family members usually stay when they are travelling?
INTERVIEWER: Please cross all boxes that apply

LA transit sites Private transit sites Roadside Friends/family Other If other, please specify

INTERVIEWER: Ask F6a — F8 ONLY if F1 = 0. Otherwise, go to F9

F6a Are there any reasons why you don't you travel at the moment?

Details

F6b Have you or family members ever travelled? *INTERVIEWER: Please cross one box only*

Yes —————> Continue to F7
 No —————> Go to F9

F7a When did you or family members last travel? *INTERVIEWER: Please write in*

Details

F7b What were the reasons for travelling? *INTERVIEWER: Please cross all that apply*

Work Holidays Visiting family Fairs Other

Details / specify if necessary. If fairs—probe for whether this involves work

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

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

If other, please specify

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

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

INTERVIEWER: Please cross one box only

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

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

Details

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

Details

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

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

Appendix D: Technical Note on Household Formation and Growth Rates