

Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021 Update

City of Bradford Metropolitan District Council

Final Report
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Executive Summary

Introduction

In October 2020, arc⁴ was commissioned by Bradford Council to update the Gypsy and Traveller Accommodation Assessment (GTAA) prepared in 2019. This early review of the study has been carried out to enhance evidence on the need for pitches from bricks and mortar households and those living on yards, (those living in bricks and mortar but with caravans located within the boundary of the property). Leeds Gypsy and Traveller Exchange (Leeds GATE) have provided invaluable assistance in carrying out interviews with households. They have also updated evidence of households living on council sites by re-interviewing households and securing interviews with households not interviewed in 2019 along with interviews of households living on the roadside within the district.

A final dataset of 59 household responses has been achieved by combining the data from the 2019 survey with any additional and updated surveys achieved in 2020. This provides an updated and enhanced dataset from which an assessment of pitch need can proceed.

Data have been analysed to provide a picture of current provision and activity across the district and an assessment of future need. The findings of the study provide an up-to-date, robust and defensible evidence base for policy development.

Population and current accommodation provision

The 2011 Census identified a total of 168 households in Bradford district where the Household Reference Person had a 'White: Gypsy or Irish Traveller' ethnicity.

The latest available Traveller caravan count (January 2020) identified a total of 54 caravans (39 social rented, 14 private authorised and 1 unauthorised) and an average of 67 caravans over the last nine counts starting in January 2016. The annual Travelling Showperson caravan count (undertaken each January) has reported an average of 24 caravans over the period 2017 to 2020.

In terms of Gypsy and Traveller site provision, there are two council sites (Esholt with 19 pitches and Mary Street with 28 pitches) and two private sites with a total of 5 pitches. The majority of pitches on the Esholt site are vacant and due to management issues and site location.

There is one Travelling Showperson's yard in the district with 36 plots, with 18 occupied.

The triangulation of secondary data, council records and fieldwork survey has identified a total of 52 Gypsy and Traveller pitches (38 are occupied and 14 were vacant at the time of the survey).

There are a total of 37 households living on the 38 occupied pitches. On one private site 2 households live across 3 pitches, which accounts for the discrepancy between the number of households and pitches occupied.

Interviews have also been achieved with 14 households living in bricks and mortar accommodation and 5 living on yards.

Planning policy requirements for needs assessments

The 2019 National Planning Policy Framework (NPPF) states in Paragraph 61 *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy (including travellers)’*. A footnote in the NPPF then states *‘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’*.

The 2015 Planning Policy for Traveller Site (PPTS) document states that *‘local planning authorities should make their own assessment of need for the purposes of planning’* and *‘ensure that their Local Plan includes a 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’*.

In the absence of further guidance on preparing GTAAs, the methods adopted by arc⁴ reflect the PPTS, build upon those methods established through previous guidance, our practical experience and decisions made at planning inquiries and appeals.

‘Cultural’ and ‘PPTS need’

In order to reconcile the requirements of national policies, the GTAA establishes an overall ‘cultural’ need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS ‘policy filter’ is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed, but the council should be mindful of a wider obligation to consider overall ‘cultural’ need.

Plan periods

Need has been assessed over a short-term 2020/21 to 2024/25 and longer-term 2025/26 to 2037/38 period.

Gypsy and Traveller pitch requirements

For the period (2020/21 to 2037/38) the GTAA has identified a cultural need of pitches of which the PPTS need is 62. Needs figures are broken down into time periods as show in Table ES1. The main drivers of need are net in-migration, new household formation and longer-term population growth.

Table ES1 Gypsy and Traveller pitch need: Bradford district for the period 2020/21 – 2037/38		
	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	25	25
Medium-term need (2025/6 to 2029/30) (B)	9	9
Long-term need (2030/31 to 2037/38) (C)	28	28
<i>Medium to Longer-term need TOTAL to 2037/38 (13 years) D=(B+C)</i>	37	37
NET SHORTFALL 2020/21 to 2037/38 (A+D) (18 years)	62	62

The GTAA analysis also considers potential additional supply of pitches through turnover on public pitches, potential expansion/intensification of existing sites and potential new sites. Currently the only supply-side factor is an annual turnover of 2 pitches on public sites. The impact this has on overall need is shown in Table ES2.

Table ES2 Bradford District pitch requirement taking into account turnover		
Bradford District	Cultural need	Of which PPTS need
Need over the next 5 years (2020/21 to 2024/25)		
5yr Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	25	25
Anticipated turnover (B)	10	10
Residual need 2020/21 to 2024/25 C=(A-B)	15	15
Medium and longer-term need (2025/26 to 2037/38)		
Need (2025/6 to 2037/38) (D)	37	37
Anticipated turnover (E)	26	26
Residual need 2025/26 to 2037/38 F=D-E	11	11
Plan period need 2020/21 to 2037/38		
Need (2020/21 to 2037/38) G=(A+D)	62	62
Anticipated turnover H=(B+E)	36	36
Residual need 2020/21 to 2037/38 I=G-H	26	26

Therefore, the Local Plan should recognise an overall need for 62 pitches (cultural) of which the PPTS need is 62 over the period to 2037/38. However, turnover on council sites will help to address some of this need.

After turnover is considered, the cultural and PPTS need reduces to 26 pitches. It is recommended that the council recognise that the minimum need for Gypsy and Traveller pitches is 26 over the plan period to 2037/38. The minimum need is for 15 pitches over the period 2020/21 to 2024/25 and a minimum need for 11 pitches over the

period 2025/26 to 2037/38. Turnover on council sites should be monitored annually as any changes in turnover would have an impact on the number of pitches needed.

Travelling Showperson plot requirements

There is one Showperson's yard in the district located at Paley Road. This is a long-standing yard and has capacity for 36 plots. According to the owner there are now 18 households living on the yard. The latest evidence would therefore suggest there is sufficient residential capacity on the yard and no additional plots are required. This is a major change to the findings from the 2015 GTAA but the number of households living on the yard has reduced since this study was prepared.

Temporary stopping places, transit provision and Negotiated Stopping

There are a number of ways to delivery temporary places where Travellers can stop whilst passing through a local authority area. These include transit pitches, stop over places and Negotiated Stopping arrangements. Data on unauthorised encampment activity helps to establish the extent to which transit provision is needed.

Given the low level of unauthorised encampment activity, it is recommended that the council adopts a Negotiated Stopping policy to address any needs arising from households travelling through the district.

1. Introduction

Overview

- 1.1 In October 2020, arc⁴ was commissioned by Bradford Council to update the Gypsy and Traveller Accommodation Assessment (GTAA) prepared in 2019. This early review of the study has been carried out to enhance evidence on the need for pitches from bricks and mortar households and those living on yards, (those living in bricks and mortar but with caravans located within the curtilage of the property). Leeds GATE have provided invaluable assistance in carrying out interviews with households. They have also updated evidence of households living on council sites by re-interviewing households and securing interviews with households not interviewed in 2019 along with interviews of households living on the roadside within the district.
- 1.2 The original 2019 GTAA was based on 27 interviews and assumptions regarding bricks and mortar need. Leeds GATE have achieved 46 interviews in 2020. A final dataset of 59 household responses has been achieved by combining the data from the 2019 survey with any additional and updated surveys achieved in 2020. This provides an updated and enhanced dataset from which an assessment of pitch need can proceed.
- 1.3 The overall aim of the GTAA update is to provide a clear, robust and credible evidence base to inform the development of planning policies relating to Gypsy and Travellers and Travelling Showpeople. The 2021 GTAA replaces the 2019 GTAA.
- 1.4 The overall objective of the GTAA is:
 - to carry out an assessment of Gypsy and Traveller, and Travelling Showpeople accommodation needs over the plan period to 2038 in accordance with the NPPF and PPTS; and
 - make recommendations on pitch/plot provision, including the specific needs for permanent and transit pitches over the plan period and any further policy recommendations relevant to planning for the needs for Gypsy and Travellers, and Travelling Showpeople.
- 1.5 This GTAA has assessed pitch needs based on the overall requirements of the Gypsy and Traveller community. It then takes into account the definitions in Annex 1 of the PPTS relating to travelling behaviour in line with government guidance. This is discussed in further detail in Chapter 2 of this report.
- 1.6 This GTAA forms part of the evidence base for the emerging Local Plan covering the period 2020 to 2038.
- 1.7 This study has been carried out during the 2020 COVID-19 pandemic and lockdown. We are extremely grateful to the help and support provided by the council, the Leeds GATE fieldwork team led by Ellie Rodgers and the local community for their support with this work.

Who the study covers

- 1.8 The GTAA 2021 adopts the definition of ‘Gypsies and Travellers’ set out within *Planning policy for traveller sites* (PPTS), which was published by the government in August 2015. This sets out the following definition of ‘Gypsies and Travellers’:

‘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 Showpeople or circus people travelling together as such.’¹

- 1.9 In addition, PPTS 2015 provides the following ‘clarification’ for determining whether someone is a Gypsy or Traveller:

‘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.’²*

- 1.10 The following definition of ‘Travelling Showpeople’ is set out in PPTS 2015:

‘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.’³

- 1.11 In addition:

‘For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use pitches for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.’⁴

- 1.12 For the purposes of this study, therefore, Gypsies and Travellers live on pitches on sites, whilst Travelling Showpeople live on plots on yards.

- 1.13 This GTAA expresses two levels of need for pitches: a ‘cultural’ and ‘PPTS’ need. This is to ensure that the overall needs of the Travelling community are fully reflected in the evidence base which needs to accord with planning and wider policies.

¹ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1

² DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2

³ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3

⁴ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 5

Report structure

1.14 The GTAA 2021 report structure is as follows:

- **Chapter 1 Introduction:** provides an overview of the study.
- **Chapter 2 Policy and local context:** presents a review of the national policy context which guides the study and the key findings from the 2019 GTAA.
- **Chapter 3 Methodology:** provides details of the study's research methodology.
- **Chapter 4 Review of current Gypsy and Traveller population and provision of pitches/plots:** reviews estimates of the Gypsy and Traveller and Travelling Showpeople population across the district and existing site/yard provision.
- **Chapter 5 Household survey:** presents relevant data obtained from the household surveys achieved.
- **Chapter 6 Pitch/plot/transit requirements:** focuses on current and future pitch/plot requirements. This chapter includes a detailed assessment of drivers of demand, supply and current shortfalls across the district.
- **Chapter 7 Conclusion and strategic response:** concludes the report, providing brief summary of key findings and recommendations.

1.15 The report is supplemented by the following appendices:

- **Appendix A** Household questionnaire.
- **Appendix B** Glossary of terms.

2. Policy and local context

- 2.1 This study is grounded in an understanding of the national legislative and planning policy context that underpins the assessment and provision of accommodation for Gypsies and Travellers and Travelling Showpeople.
- 2.2 This chapter sets out the policy context within which this GTAA has been prepared, including a consideration of the previous GTAA for the district.

Government policy and guidance

- 2.3 The 2019 National Planning Policy Framework states in Paragraph 61 *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’* It then lists a number of groups including Travellers. A footnote to the paragraph states *‘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’*.
- 2.4 The 2015 Planning Policy for Traveller Site (PPTS) document states that *‘local planning authorities should make their own assessment of need for the purposes of planning’* and *‘ensure that their Local Plan includes a 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’*.
- 2.5 Policy A of the 2015 PPTS relates to evidence needed to plan positively and manage development. This states *‘in assembling the evidence base necessary to support their planning approach, local planning authorities should:*
 - *pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups);*
 - *co-operate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and*
 - *use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*
- 2.6 In the absence of further guidance on preparing GTAAs, the methods adopted by arc⁴ reflect Policy A of the PPTS; build upon those methods established

through previous guidance⁵; our practical experience and findings from planning inquiries and appeals.

- 2.7 Policy B of the 2015 PPTS relates to planning for traveller sites and requires Local Plans:
- to be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and
 - to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 2.8 Policy B (paragraph 10) sets out that local authorities should, in producing their Local Plan:
- a. identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
 - b. identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
 - c. 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 (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
 - d. 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; and
 - e. protect local amenity and environment.
- 2.9 Policy B (paragraph 13) sets out that local authorities should ensure that traveller sites are sustainable economically, socially and environmentally and therefore ensure that their policies:
- a. promote peaceful and integrated co-existence between the site and the local community;
 - b. promote, in collaboration with commissioners of health services, access to appropriate health services;
 - c. ensure that children can attend school on a regular basis;

⁵ The calculation of pitch/plot requirements is based on established DCLG modelling methodology, as advocated in *Gypsy and Traveller Accommodation Needs Assessment Guidance* (DCLG, 2007). Although this guidance was formally withdrawn in December 2016, in the absence of any updated guidance on the subject, it continues to provide a good practice approach for needs modelling.

- d. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- e. provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers who may locate there or on others as a result of new development;
- f. avoid placing undue pressure on local infrastructure and services;
- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Intentional unauthorised development

- 2.10 The planning policy statement issued with PPTS 2015⁶ (and confirmed by Ministerial Statement⁷) makes clear that if a site is intentionally occupied without planning permission this would be a material consideration in any retrospective planning application for that site. Whilst this does not mean that retrospective applications will be automatically refused, it does mean that failure to seek permission in advance of occupation will count against the application.
- 2.11 In addition, PPTS 2015 (Paragraph 12) makes clear that in exceptional cases where a local authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local authority will be required to meet their Gypsy and Traveller site needs in full. This is intended to protect local planning authorities with significant land constraints from being required to provide for additional needs arising directly from large sites such as Dale Farm (a large unauthorised site in Essex).

PPTS Definitions

- 2.12 The PPTS 2015 Annex 1 sets out definitions of Gypsies and Travellers and Travelling Showpeople for the purposes of planning policy:

“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 Showpeople or circus people travelling together as such.”⁸

⁶https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457632/Final_Chief_Planning_Officer_letter_and_written_statement.pdf

⁷<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-12-17/HCWS423/>

⁸ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 1

- 2.13 In addition, PPTS 2015 adds the following ‘clarification’ for determining whether someone is a Gypsy or Traveller:

“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.”⁹*

- 2.14 The following definition of ‘Travelling Showpeople’ is used, also taken from PPTS 2015:

“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.”¹⁰

- 2.15 In addition:

“For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use pitches for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.”

Considering ‘Cultural’ and ‘PPTS’ need

- 2.16 Paragraph 61 of the 2019 NPPF recognises the need to assess a range of community needs including those of Travellers. The February 2019 Planning Practice Guidance (PPG) which accompanies the NPPF states, ‘the household projections that form the baseline of the standard method are inclusive of all households including Gypsies and Travellers as defined with Planning Policy for Travelling Sites’¹¹. The NPPF states that the PPTS sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document. The planning policy therefore differentiates between ‘travelling’ and ‘non travelling’ Gypsies and Travellers.
- 2.17 For non-travelling Travellers, their needs should also be met by the requirements of the NPPF as non-travelling households are a component of overall housing need. The needs of non-travelling Gypsies and Travellers are therefore effectively contained within the general housing requirement that Local Plans will set out. Additionally, the Human Rights Act 1998 and the Equalities Act 2010 protects the cultural choice of Gypsies and Travellers to live in mobile

⁹ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 2

¹⁰ DCLG *Planning policy for traveller sites* August 2015 Annex 1, para 3

¹¹ 2019 PPG Paragraph: 017 Reference ID: 2a-017-20190220

accommodation and therefore there is a need to plan for this type of accommodation. The Housing and Planning Act 2016 section 124 also makes specific reference to the needs of households living in caravans.

- 2.18 Therefore, our GTAAs establish an overall ‘cultural’ need for pitches which accords with the overall need for the Travelling community and takes into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. A PPTS ‘policy filter’ is then applied to identify the level of need associated with those households meeting the definitions set out in the PPTS Annex 1. It is our understanding that the needs arising from the PPTS analysis establishes the level of need against which a 5-year land supply is assessed but the council should be mindful of a wider obligation to consider overall ‘cultural’ need.
- 2.19 Our assessment methodology is set out in Chapter 3 and the outworking of this approach for the borough is set out in Chapter 7.

Previous GTAA

- 2.1 The 2019 GTAA established a cultural need of 17 pitches and a PPTS need for 10 pitches over the period to 2035/36. The main drivers for this need were:
- in the short-term, existing households moving into the district and moves from bricks and mortar housing; and
 - in the longer-term and households expected to emerge over the plan period.
- 2.2 Regarding Travelling Showperson need, there is one yard in the district. Based on discussions with the yard manager there was no additional need for plots.

3. Methodology

Introduction

- 3.1 The GTAA research method is grounded in an understanding of the requirement of the NPPF and based on an established methodology which regularly withstands scrutiny at planning inquiries and hearings.
- 3.2 The methodology has comprised:
- a desktop analysis of existing documents, including data on pitches/sites, plots/yards and unauthorised encampments;
 - the collection of primary data, including a household interviews with Gypsies and Travellers and Travelling Showpeople drawing upon data collected as part of the 2019 GTAA and significantly enhanced with further interviews carried out by Leeds GATE during October and December 2020; and
 - an assessment of accommodation needs taking into account all available data and information.
- 3.3 The information gathering has been carried out in three phases, as outlined below:
- Phase 1: Literature/desktop review and stakeholder discussions;
 - Phase 2: Survey of Gypsies and Travellers and Travelling Showpeople across the district in 2019 and supplemented with additional surveys in 2020;
 - Phase 3: Needs assessment and production of the GTAA 2021 update report.

Phase 1: Literature/desktop review

- 3.4 We have reviewed relevant literature, including legislative background and best practice information; and an analysis of available secondary data relating to Gypsies and Travellers and Travelling Showpeople in the district.

Phase 2: Fieldwork survey and interviews with Gypsies and Travellers and Travelling Showpeople

- 3.5 Our aim is to obtain interviews from all households living on sites using a standard questionnaire (Appendix A). This questionnaire has been carefully designed in consultation with councils, feedback from community representatives and planning agents.
- 3.6 A total of 27 Gypsy and Traveller interviews were achieved in the 2019 GTAA:
- 23 on council sites and 4 on private sites

- 3.7 A total of 46 Gypsy and Traveller interviews were achieved by Leeds GATE during October to December 2020:
- 24 on council sites, 3 on the roadside, 5 on yards and 14 from bricks and mortar households.
- 3.8 The survey responses from 2019 and 2020 have been carefully combined to derive a final dataset of 59 achieved interviews which comprise the following responses:
- 33 on council sites, 4 on private sites, 5 on yards, 3 on the roadside and 14 from bricks and mortar households.
- 3.9 Regarding the PPTS definition, the questionnaire asks if households have been travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. Note that households who cannot travel due to age or health limitations are excluded from analysis. If eligible households answer 'yes' to either question the household meets the travelling criteria set out in PPTS. By contrast, all households identifying as part of the Gypsy and Traveller or Travelling Showpeople community are contained within a broader 'cultural' definition.
- 3.10 Analysis of the updated household survey data established that 89% of respondents across all residential settings (pitches, yards and bricks and mortar) meet the PPTS 2015 definition of being a Gypsy/Traveller household. These households meet the definition by either travelling in the preceding year or within the past 5 years and/or intend to travel in the next year or in any year in the next five years. This is discussed further in the analysis in Chapter 7. Note that all households planning to move to alternative accommodation and newly-forming households all meet the PPTS definition.

Phase 3: Needs assessment and production of report

- 3.11 A detailed explanation of the analysis of pitch requirements is contained in Chapter 6 but briefly comprises analysis of the following:
- current pitch supply, households living in bricks and mortar accommodation, households planning to move in the next five years, and emerging households, to give total need for pitches; and
 - supply based on the number of authorised pitches and turnover on sites on public pitches.
- 3.12 The overall need for pitches is then compared with the overall supply.
- 3.13 The need for transit pitches was calculated using unauthorised encampment data which set out how many encampments had taken place and the number of caravans on them. The survey also asked households if they felt there was a need for transit pitches.

Pitches and households

- 3.14 One of the key challenges faced when assessing Gypsy and Traveller pitch requirements is the actual nature of pitches and how this relates to the number of households they can support.
- 3.15 PPTS 2015 refers to the need for Local Planning Authorities to *'identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets'* and *'relate the number of pitches/plots to the circumstances of the specific size and location of the site and the surrounding population's size and density'* (PPTS 2015, paragraph 10).
- 3.16 Planning decision notices usually refer to the number of pitches on a site or the specifics of what can be on a pitch e.g. statics, tourers; or specific individuals and/or households.
- 3.17 As part of the GTAA, it is essential that the characteristics of sites, the number of pitches and how many households these can support is carefully considered. There are a range of issues which need to be considered when reviewing site and pitch characteristics and their potential implications for future pitch and site requirements which are now summarised.

Site and pitch size

- 3.18 There are no definitive parameters for site or pitch sizes. Previous Design Guidance (DCLG, 2008) states in paragraph 4.4 that *'Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take into account the size of the site and the needs and demographics of the families resident on them'*.
- 3.19 Paragraph 4.47 states that *'to ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately'*.
- 3.20 Paragraph 7.12 states that *'as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area'*.
- 3.21 Paragraph 4.13 states that *'smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle'*.
- 3.22 There is no guidance on the maximum size of a site but it is generally accepted amongst the Travelling community that sites of 6-10 pitches are appropriate.

Occupancy

- 3.23 A pitch may accommodate more than one family unit, for instance it could include a family, older children who have formed their own household and other family

members. This could lead to potential overcrowding and this is considered as part of the GTAA household survey.

- 3.24 Private sites may restrict occupancy to close family/friends. This limits opportunity for others to move onto the site but this restrictive occupancy may provide for emerging needs within a household, for example as grown-up children (previously living within a parent(s) or grandparent(s) home) form independent households of their own.
- 3.25 Quality, size of pitch and proximity of caravans on pitches vary dramatically.

Response

- 3.26 For each site, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches or sub-divisions on sites. This may relate to the number of families living on sites and could include a consideration of the potential intensification of sites (for instance through further sub-division, extension or use of vacant areas within the site). Capacity and layout of sites should be identified through site observation (directly or indirectly through Google maps or similar), planning history and local knowledge of planning, enforcement and liaison officers.
- 3.27 Pitches can become intensified or sub-divided once planning applications have been approved. These sub-divisions tend to be tolerated by councils. Often pitches become subdivided to provide space for newly-forming households, particularly from family members. The potential for pitch intensification/sub-division was considered on site visits and respondents were asked whether intensification/sub-division was possible on the site they lived on.

4. Review of the Gypsy, Traveller and Travelling Showpeople population and existing provision of pitches and plots

- 4.1 This chapter looks at the current picture in terms of the current population and demography of Gypsies and Travellers across the study area before going on to explore the extent and nature of provision across the area.

2011 Census population and household estimates

- 4.2 Whilst it is appreciated that some households may not identify themselves as Gypsies or Travellers, the 2011 Census (Tables 4.1 and 4.2) indicated a total of 424 people and 168 households in Bradford district with a Household Reference Person who identified as having a White Gypsy or Irish Traveller ethnicity.

Table 4.1 People from households identifying as White Gypsy or Irish Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Bradford	424	324	55	45

Source: 2011 Census CT127

Table 4.2 Households identifying as Gypsy Traveller by accommodation type

Local Authority	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Bradford	168	105	34	29

Source: 2011 Census CT0128

Caravan Count information

- 4.3 Snapshot counts of the number of Gypsy and Traveller caravans were requested by the government in 1979 and have since been undertaken every January and July by local authorities. An annual count of Travelling Showperson caravans takes place every January. The counts provide a source of information on the number of caravans located on authorised and unauthorised sites but do not record the actual number of pitches on sites/yards.
- 4.4 The figures for the last nine Traveller caravan counts for Bradford district are set out in Table 4.3. Data shows that an average of 67 caravans have been recorded on sites across the district during the nine-count period. Of these, 98% have been on authorised sites (68.1% social rented and 29.9% private) and 2% are on unauthorised sites.

Table 4.3 Bi-annual Traveller caravan count figures January 2016 to January 2020 for Bradford district

Date	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
Jan 2016	43	29	0	72
Jul 2016	28	31	0	59
Jan 2017	59	8	8	75
Jul 2017	52	31	0	83
Jan 2018	55	3	0	58
Jul 2018	33	30	0	63
Jan 2019	55	3	0	58
July 2019	46	31	3	80
Jan 2020	39	14	1	54
Nine-Count Average	46	20	1	67
Nine-Count % Average	68.1	29.9	2.0	100.0

Source: MHCLG Traveller Caravan Count, Live Table 1

- 4.5 Over the period 2017 to 2020 there have been an average of 24 Travelling Showperson caravans across Bradford district¹² (Table 4.4).

¹² Data for 2015 and 2016 excluded as this showed zero caravans but the yard has been in continuous occupation during these years

Table 4.4 Annual Travelling Showpeople caravan count figures January 2015 to January 2020

Count	Authorised sites with planning permission		Unauthorised sites without planning permission	Total
	Social Rented	Total Private	Total Unauthorised	
2015	0	0	0	0
2016	0	0	0	0
2017	0	24	0	24
2018	0	24	0	24
2019	0	24	0	24
2020	0	25	0	25
Four-Count Average (2017 onwards)		24	0	24

Source: MHCLG Travelling Showpeople Caravan Count, Live Table 3

Local site and yards

- 4.6 Broadly speaking, authorised sites are those with planning permission and can be on either public or privately-owned land. Unauthorised sites are made up of either longer term¹³ unauthorised encampments¹⁴, that have been in existence for some considerable time and so can be considered to be indicative of a permanent need for accommodation (in some instances local authorities class these as tolerated sites and do not take enforcement action to remove them); and unauthorised developments, where Travellers are residing upon land that they own and that does not have planning permission (see Appendix B for more detailed definitions).
- 4.7 Table 4.6 sets out the range of Gypsy and Traveller sites. The table also shows the number of household survey responses achieved. Across Bradford district there are two council sites and 2 private sites. In addition, there are 5 ‘yards’ which are bricks and mortar dwellings with caravans located within the curtilage of the property.
- 4.8 There is also a Travelling Showperson’s yard in Bradford on Paley Road. This is a long-standing yard and has capacity for 36 plots. According to the owner there are now 18 households living on the yard. Locations are shown in Map 4.1.

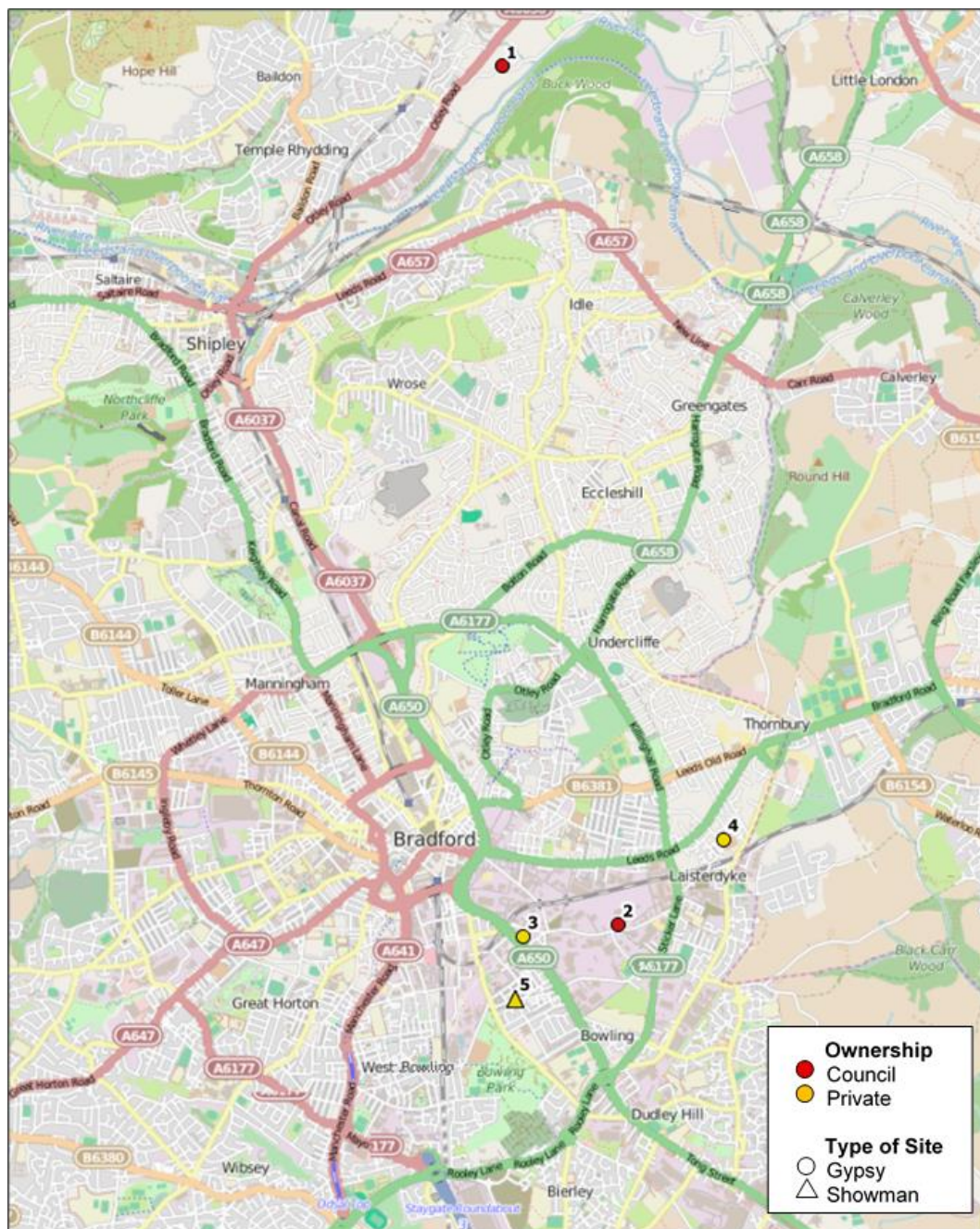
¹³ Approximately three months or longer

¹⁴ Please note that unauthorised encampments also encompass short-term illegal encampments, which are more indicative of transit need, see para 7.10 for more information on these encampments.

Table 4.3 List of Gypsy and Traveller sites and Travelling Showperson's yards as at December 2020							
Site Name	Site Location	Type of Site	Ownership	Total number of pitches	Occupied pitches	Vacant pitches	Households
1. Esholt	Esholt Lane, Esholt, BD17 7RJ	Permanent Authorised	Council	19	5	14	5
2. Mary Street	Mary Street, Bradford, BD4 8TF	Permanent Authorised	Council	28	28	0	28
3. Square Street	Square Street, Bradford, BD4 7NP	Permanent Authorised	Private	3	3	0	2
4. Gavin Close	Gavin Close, Bradford, BD3 8PS	Permanent Authorised	Private	2	2	0	2
G&T TOTAL				52	38	14	37
Yard Name	Yard location	Type of Yard	Ownership	Total number of plots	Occupied plots	Vacant plots	Households
5. Paley Road	Paley Road, Bradford, BD4 7EN	Permanent Authorised	Private (on council land)	36	18	18	18

Source: Council data 2019 and 2020, site survey fieldwork 2019 and 2020
 Note Numbers next to site name correspond with Map 4.1

Map 4.1 Location of Gypsy and Traveller sites in Bradford district



5. Household survey and stakeholder findings

- 5.1 This chapter presents the findings of the household survey data collected in 2019 and 2020. The surveys aimed to reach as many Gypsy, Traveller and Travelling Showpeople living in the district area as possible. It was conducted using the questionnaire presented in Appendix A.
- 5.2 There were a total of 59 responses to the household survey. Of these:
- 33 were Gypsy and Traveller households living on council sites, 4 on private sites, 5 on yards, 14 in bricks and mortar accommodation and 3 on the roadside.
- 5.3 For the purposes of this household survey analysis, data have not been weighted. Broad summaries of the household survey data findings are presented in order to maintain respondent confidentiality. For each question, the number of achieved responses is indicated by, for example, n=59 which means that of all respondents, 49 provided an answer to the question
- 5.4 Of household representatives interviewed (n=49), 65.3% described themselves as Gypsy (including Romany, Romany Gypsy, English Gypsy, Welsh Gypsy), 26.5% as Irish Traveller and 8.2% and other groups.
- 5.5 Data from the household survey provided an insight into household size, type and the age of residents living on pitches.
- 5.6 In terms of household size (n=59): 16.9% of households were single person; 23.7% were two person; 23.7% were three person; 16.9% were four person, 3.4% were five person and 15.4% were six or more person households.
- 5.7 Regarding household type (n=59): 37.3% were lone parents, 23.7% couples with children, 13.6% couples, 13.6% singles and 11.8% other household types (for instance siblings sharing or extended families).
- 5.8 There were a total of 200 people living in the 59 households interviewed or an average of 3.3 people in each household. The age group profile of Gypsies and Travellers is show in Table 5.1.

Table 5.1 Age profile of Gypsies and Travellers in Bradford district

Age group	Number	%
13 and under	79	40.3
14-17	7	3.6
18-34	50	25.5
35-44	20	10.2
45-59	21	10.7
60 and over	19	9.7
Total	196	100
Base: 59 households (4 missing ages)		

- 5.9 In terms of length of residence (n=56), 25% of respondents had lived at their place of residence for less than 5 years, 21.4% for between 5 and less than 10 years, 17.9% between 10 and less than 20 years and 35.7% for 20 or more years.
- 5.10 When asked about overcrowding (n=55), 25.5% of respondents said that their home is overcrowded and 2.7% said their pitch was overcrowded (n=37).
- 5.11 When asked about the need for more residential pitches (n=55), 94.5% of respondents stated that more were needed. Of those stating a number (n=47), 83% stated a need for up to 5 additional pitches, 14.9% between 5 and up to 10 pitches and 2.1% more than 10 pitches.
- 5.12 Regarding for transit provision, 79.6% (n=54) said there was a need. 84.2% stated a need for up to 5 additional pitches, 10.5% between 5 and up to 10 pitches and 5.3% more than 10 pitches.

6. Gypsy and Traveller pitch, Travelling Showperson plot and transit site requirements

Introduction

- 6.1 This section reviews the overall pitch and plot requirements of Gypsies and Travellers and Travelling Showpeople across Bradford district. It takes into account current supply and need, as well as future need, based on modelling of data. This chapter also considers transit pitch requirements for Gypsies and Travellers. Finally, it presents planning policy recommendations.
- 6.2 The calculation of pitch requirements is based on modelling as advocated in *Gypsy and Traveller Accommodation Assessment Guidance* (DCLG, 2007). Although now formally withdrawn, the former DCLG Guidance still provides the best-practice approach towards the assessment of pitch and plot needs (see Chapter 2 for further discussion).
- 6.3 This approach requires an assessment of the current needs of Gypsies and Travellers and a projection of future needs. It advocates the use of a survey to supplement secondary source information and derive key supply and demand information.
- 6.4 The GTAA has modelled current and future need and current and future supply separately for Gypsies and Travellers and Travelling Showpeople. For both groups, the modelling shows an overall ‘cultural’ need and then a ‘policy-on’ ‘PPTS need which takes into account those households who met the PPTS planning definition.

Gypsy and Traveller pitch requirement model overview

- 6.5 Pitch need is assessed for two time periods. A short-term 5-year model looks at need over the next 5 years (2020/21 to 2024/25). A longer-term model looks at need over the remainder of the plan period (to 2037/38) arising from children likely to need a pitch.
- 6.6 In terms of **cultural need**, the 5-year model considers:
- the baseline number of households on all types of site (authorised, unauthorised and temporary authorised sites) as at December 2020;
 - existing households planning to move in the next five years (currently on sites and also from bricks and mortar and yards) and where they are planning to move to; and
 - emerging households currently on sites, on yards and in bricks and mortar housing who are planning to form households in the next five years and stay within the study area on a pitch; to derive a figure for
 - total pitch need.
- 6.7 In terms of **supply**, the model considers:
- total supply of current pitches on authorised sites; and

- vacant pitches on authorised sites.
- 6.8 The model then reconciles total need and existing authorised supply over the next 5 years by summarising:
- total need for pitches; and
 - total supply of authorised pitches.
- 6.9 The longer-term model then considers the cultural need over the period to 2035/36. This is based on the age profile of children under 13 living in Gypsy and Traveller households on pitches (the longer-term model).
- 6.10 For each model, the likely pitch need from households meeting the PPTS definition is also calculated.

Gypsy and Traveller pitch need analysis: Description of factors in the 5-year need model

- 6.11 Table 6.1 provides a summary of the 5-year pitch need calculation. Each component in the model is now discussed to ensure that the process is transparent and any assumptions clearly stated.

Need

6.12 **Current households living on pitches (1a to 1e)**

These figures are derived from site observation, site management data and local knowledge. There are a total of 37 households living on 38 pitches. On one private site, 2 households live across 3 pitches.

There are a total of 52 residential pitches across the district which includes 14 vacant pitches on the Esholt site. However, due to site management (reflected in the high number of vacant pitches) and locational issues (flood risk) it is assumed in the modelling that the vacant pitches are not part of authorised supply.

No households were identified as being concealed/doubled up on pitches.

6.13 **Current households in bricks and mortar accommodation (2)**

The 2011 Census suggested there were 168 households living in bricks and mortar accommodation. The 2020 survey identified 5 'yards' which are bricks and mortar dwellings with caravans located within the boundaries of the property. It is not assumed that it is necessary to establish these are permanent sites but any needs from people living on yards has been included in the needs analysis. A total of 14 households living in bricks and mortar households were interviewed.

6.14 **Weighting applied to sections 3 and 4**

As data on all households living on pitches has been obtained, no weighting is applied to the survey data.

6.15 **Existing households planning to move in the next five years (3)**

This was derived from information from the household survey for respondents in different residential settings. .

For existing households currently on sites, 13 plan to move in the next 5 years (rows 3a to 3d) but as these already have sites, the move would result in no net impact on the need for additional pitches.

For households currently in bricks and mortar, 1 household plans to move to a site (increasing need) (row 3e) and 3 to another bricks and mortar property (no net impact on need) (row 3f).

For households currently living on a yard, 1 household plans to move to a site (increasing need) (row 3g)

For households currently on the roadside, 2 plan to move onto a pitch (increasing need) (row 3h)

Regarding in-migration, analysis of household survey data indicates a considerable level of in-migration into the district in the past 5 years and row 3j therefore shows a need from 8 households based on the assumption that the same level of in-migration would be experienced in the next 5 years.

The factors presented in section 3 of the model result in an overall net requirement of +11 pitches from existing households planning to move in the next 5 years.

6.16 **Emerging households (4)**

This is the number of households expected to emerge in the next 5 years and remain in the district based on household survey information from people living in all residential settings. The total number is +15.

If children old enough to form their own household were living with family and have not specified that they want to form a new household, this is assumed to be through choice and the model does not assume they want to form a new household.

6.17 **Total need for pitches (5)**

This is a total of current households on authorised pitches; households on pitches, in bricks and mortar, on yards and on the roadside planning to move in the next five years ; and demand from emerging households currently living on pitches, in bricks and mortar, on yards and on the roadside. This indicates a total need for 63 pitches.

Supply

6.18 **Current supply of authorised pitches (6)**

This is a summary of the total number of authorised pitches and the number of vacant authorised pitches. This shows a total supply of 38 occupied authorised pitches. There are 14 vacant pitches on the Esholt site. However, this site has management and locational challenges. Therefore, the 14 pitches are not included as part of authorised supply.

Reconciling supply and demand

- 6.19 There is a total need over the next five years (2020/21 to 2024/25) for 63 pitches in Bradford district (Table 6.1) compared with a supply of 38 authorised pitches. The result is an overall cultural shortfall of 25 pitches.

Table 6.1 Summary of need and supply factors: Gypsies and Travellers – 2020/21 to 2024/25			
CULTURAL NEED		Bradford	
1	Total households living on pitches	1a. On LA Site	33
		1b. On Private Site – Authorised	4
		1c. On Private Site - Temporary Authorised	0
		1d. Unauthorised	0
		1e. Total (1a to 1e)	37
2	Estimate of households in bricks and mortar accommodation and living on yards	2a. TOTAL (2011 Census)	168
		2b. Interviews with household on yards (note 1)	5
		2c. Interviews with bricks and mortar households	14
3	Existing households planning to move in next 5 years	Currently on sites	
		3a. To another pitch/same site (no net impact)	3
		3b. To another site in District (no net impact)	9
		3c. From site to Bricks and Mortar (-)	1
		3d. To a site/bricks and mortar outside District (-)	0
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA (+)	1
		3f. Planning to move to another B&M property (no net impact)	3
		Currently on yards	
		3g. Planning to move to a site in the LA (+)	1
		Currently on roadside	
		3h. Planning to move to a site in the LA (+)	2
		In-migrant households	
3i. Allowance for in-migration (+)	8		
3j. TOTAL Net impact (-3c-3d+3e+3g+3h+3i)	11		
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site (+)	3
		4b. Currently on sites and planning to live on another site in LA (+)	0
		4c. Currently on site and planning to live on site outside the study area (no net impact)	0
		4d. Currently in B&M planning to move to a site in LA (+)	7
		4e. Currently in B&M and moving to B&M (no net impact)	0
		4f. Currently on Site and moving to B&M (no net impact)	0
		4g. Current on Yard and planning to move to a site in the LA (+)	3
		4h. Currently on Roadside and planning to move to a site in the LA (+)	2
		4i. TOTAL (4a+4b+4c+4d+4g+4h)	15
5	Total Need	1e+3j+4i	63

SUPPLY			
6	Current supply of authorised pitches	6a Current occupied authorised pitches (note 2)	38
		6b Current unoccupied authorised pitches (note 3)	0
		6c. Total current authorised supply (6a+6b)	38
RECONCILING NEED AND SUPPLY			
7	Total need for pitches	5 years (from 5)	63
8	Total supply of authorised pitches	5 years (from 6c)	38
5 YEAR AUTHORISED PITCH SHORTFALL 2020/21 TO 2024/25			25

Notes –

Note 1. There are 5 ‘yards’ in the district. They are not authorised sites but comprise dwellings with caravans within the boundary of the property. It is not assumed that it is necessary to establish these are permanent sites but any needs from people living on yards has been included in the needs analysis.

Note 2. One private site has two households living across 3 pitches, so the total number of available pitches is 38.

Note 3. There are 14 vacant pitches on the Esholt site. However, this site has management and locational challenges. Therefore, the 14 pitches are not included as part of authorised supply.

Longer-term pitch requirement modelling

- 6.20 Longer-term pitch need modelling has been carried out using known household structure information from the household survey of households living on pitches. On the basis of the age of children in households, it is possible to determine the extent of ‘likely emergence’, which assumes that a child is likely to form a new household at the age of 18.
- 6.21 The year when a child reaches 18 has been calculated and it is possible to assess how many newly forming households may emerge over the period 2025/26 to 2037/38. A reasonable assumption is that half of these children will form new households, bearing in mind culturally women tend to move away on marriage and men tend to stay in close proximity to their families on marriage. The model therefore assumes that 50% of children will form households when they reach 18 and that these households remain in Bradford district¹⁵. Analysis would suggest a total cultural need for 37 additional pitches over the period 2025/26-2037/38 (Table 6.2).

¹⁵ This approach has been tested at inquiry and the assumption has been corroborated by several Travelling interviewees

Table 6.2 Future pitch requirements in Bradford district based on the assumption that 50% of children form households on reaching 18 2025/26 to 2037/38

Time period	No. children	Expected household formation
2025/26 to 2029/30	18	9
2030/31 to 2035/36	37	18
2036/37 to 2037/38	20	10
Total (2025/26 to 2037/38)	75	37

Planning Policy for Traveller Site definition

- 6.22 Analysis of household survey data establishes the following:
- A. 45 households meet the PPTS definition as they have either travelled in the past or intend to travel in the future;
 - B. 10 households do not meet the PPTS definition as they have stated that they have not travelled in the past 5 years and to not intend to travel;
 - C. 2 households are exempt from analysis because they are unable to travel due to illness or old age; and
 - D. data on travelling behaviour of 2 households was not obtained
- 6.23 Therefore the total base of households for the PPTS definition test is 55 (A+B) , 45 meet the PPTS definition (82%) and 10 do not meet the PPTS definition (18%).
- 6.24 All existing households planning to move meet the PPTS definition and all households planning to emerge live in a household that meets the PPTS definition. Therefore, all need evidenced in the 2021 GTAA is from households who meet the PPTS definition.
- 6.25 Households who travel (n=45) could state one or more reason for travelling and the most frequently mentioned reasons for travelling were cultural reasons (50%), visiting family/friends (25%), personal preference (12.5%) and work related (12.5%).

Overall plan period pitch need

- 6.26 Table 6.3 summarises the overall need for pitches across Bradford district over the plan period to 2037/38. It presents the overall cultural need based on households identifying as Gypsy and Traveller and a 'policy on' PPTS need which is a subset of the cultural need and is based on those eligible households who meet the PPTS definition of need. Need has been assessed over a short-term 2020/21 to 2024/25 and longer-term 2025/26 to 2037/38 period.
- 6.27 The overall need is 62 pitches of which 62 is PPTS need. The main drivers of need are net in-migration, new household formation and longer-term population growth.

Table 6.3 Plan period Gypsy and Traveller pitch need: Bradford district 2020/21 to 2037/38

	Cultural need	Of which: PPTS need
5yr Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	25	25
Medium-term need (2025/6 to 2029/30) (B)	9	9
Long-term need (2030/31 to 2037/38) (C)	28	28
<i>Medium to Longer-term need TOTAL to 2037/38 (13 years) D=(B+C)</i>	37	37
NET SHORTFALL 2020/21 to 2037/38 (A+D) (18 years)	62	62

Potential capacity for Gypsy and Traveller pitches on existing sites

Turnover on sites

- 6.28 Turnover relates to the number of pitches that are expected to become available for occupancy. Analysis only includes expected turnover on public sites as this is referenced in (former) CLG guidance and more accurate data on changes in pitch occupancy is likely to be available. Although there is likely to be turnover on private sites, the ability of households to move onto private sites may be more restrictive (for instance the site may be restricted to a particular family) and less likely to be recorded.
- 6.29 Household survey data indicates that 11 households had moved onto their pitch in the previous 5 years. Similarly, 10 households were planning to move in the next 5 years. Averaging these two figures results in a 5-year anticipated turnover of around 10 pitches or 2 pitches each year. This translates to a 5.4% annual turnover rate.
- 6.30 This analysis would suggest that around 36 pitches are likely to come available for occupancy over the plan period.

Regularisation of sites

- 6.31 This means turning unauthorised or temporary authorised sites into permanent authorised sites. As there are no such sites in the district this is not an option.

Expansion and intensification of sites

- 6.32 The household survey asked respondents if there was opportunity to expand or intensify existing sites to accommodate more pitches. Some of the households on council sites suggested they could be extended. However, based on the size and layout of the sites there is no scope to expand the sites and the pitches are not a suitable size to be sub-divided.

Conclusion on future capacity

- 6.33 The only additional source of pitches is through turnover. A turnover rate of 2 pitches each year has been established. This means 10 pitches coming available over the first five years and a further 26 pitches over the longer-term to 2037/38.
- 6.34 The impact on future capacity is show in Table 6.4. This shows that after turnover is considered, the cultural and PPTS needs reduces to 26 pitches. It is recommended that the council recognise that the minimum need for Gypsy and Traveller pitches is 26 over the plan period to 2037/38. The minimum need is for 15 pitches over the period 2020/21 to 2024/25 and a minimum need for 11 pitches over the period 2025/26 to 2037/38. Turnover on council sites should be monitored annually as any changes in turnover would have an impact on the number of pitches needed.

Table 6.4 Bradford District pitch requirement taking into account turnover		
Bradford District	Cultural need	Of which PPTS need
Need over the next 5 years (2020/21 to 2024/25)		
5yr Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	25	25
Anticipated turnover (B)	10	10
Residual need 2020/21 to 2024/25 C=(A-B)	15	15
Medium and longer-term need (2025/26 to 2037/38)		
Need (2025/6 to 2037/38 (D)	37	37
Anticipated turnover (E)	26	26
Residual need 2025/26 to 2037/38 F=D-E	11	11
Plan period need 2020/21 to 2037/38		
Need (2020/21 to 2037/38 G=(A+D)	62	62
Anticipated turnover H=(B+E)	36	36
Residual need 2020/21 to 2037/38 I=G-H	26	26

Housing register evidence

- 6.35 No housing register evidence is available for the council sites

Temporary stopping places and transit requirements

- 6.36 There are a number of ways to delivery temporary places where Travellers can stop whilst passing through a local authority area. Options for transit provision include transit sites, temporary stop over places and Negotiated Stopping agreements¹⁶.

¹⁶ See <https://www.negotiatedstopping.co.uk> for more information

- 6.37 Transit sites are permanent sites intended for temporary use by Gypsies and Travellers. The length of stay is usually limited to a maximum of three months. In terms of transit pitches, 'Designing Gypsy and Traveller Sites: Good Practice Guide' (CLG, 2008) states:
- Size of pitch – sufficient to accommodate two touring caravans, two parking spaces and private amenities;
 - Amenities should include electricity supply, toilet, wash basin and shower with hot and cold water supply for each pitch; and
 - Depending on the level of use, portable facilities may be more appropriate, particularly if the sites are empty for lengthy periods of time and therefore at risk of vandalism.
- 6.38 A temporary stop over area is land which can be used on a temporary basis if unauthorised encampments occur or likely to occur. They can be fields, areas of hardstanding or a mixture of both. Temporary facilities can be provided when the temporary stop over is in use, for instance portable toilets and rubbish collection.
- 6.39 Negotiated Stopping involves councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tend to be around 28 days; and users agree to comply with rules for behaviour and use of the site.
- 6.40 80% of respondents felt that transit provision is needed in Bradford district (number of responses =54). Of those responding, most (84.2%) stated that up to 5 transit pitches were needed, 10.5% said between 5 and less than 10 pitches and 5.2% said 10 or more pitches were needed stated that between 5 and 8 were needed.
- 6.41 When asked who should manage transit provision, 64.6% said the council, 27.1% said the Traveller community, 6.3% said either council or the Travelling community and 2.1% stated Negotiated Stopping.
- 6.42 A good indicator of transit need is unauthorised encampment activity. Across Bradford, the level of unauthorised encampment is low. Data provided by the council to Leeds GATE in June 2020 indicated one encampment as at 4 June 2020 but the number does fluctuate over the year. Three roadside families were known to the council and it is assumed that these are the same three families that were interviewed by Leeds GATE and their needs acknowledged in this study.
- 6.43 Given the low level of unauthorised encampment activity, it is recommended that the council work with Leeds GATE to establish a Negotiated Stopping policy¹⁷ rather than allocate land for transit/stop over pitches.

¹⁷ See <https://www.negotiatedstopping.co.uk> for further details

Showperson plot requirements

- 6.44 There is one Showperson's yard in the district located at Paley Road. This is a long-standing yard and has capacity for 36 plots. According to the owner there are now 18 households living on the yard. This is a marked reduction to the 42 households identified in the previous GTAA.
- 6.45 The latest evidence would therefore suggest there is sufficient residential capacity on the yard and no additional plots are required. It is accepted that this is major change to the evidence from the 2015 GTAA but reflects the significant reduction of households living on the yard.

7. Conclusion and response

- 7.1 This concluding chapter provides a brief summary of key findings and recommendations.

Meeting permanent Gypsy and Traveller pitch requirements

- 7.2 The triangulation of secondary data, council records and fieldwork surveys has identified a total of 52 Gypsy and Traveller pitches (38 are occupied and 14 pitches on the Esholt site are vacant). There are 47 pitches on two council sites and 5 pitches on private authorised sites. Sites are mainly located to the south and east of the city centre. It would be reasonable to provide new pitches in proximity to existing sites but further engagement with LeedsGATE on site locations is recommended.
- 7.3 The GTAA has assumed a total of 37 households living on 38 pitches. On one site 2 households live across 3 pitches, which accounts for the discrepancy between the number of households and pitches occupied.
- 7.4 The study has considered future need from households living on sites, yards, bricks and mortar accommodation and has also considered need from households moving into Bradford based on recent migration trends.
- 7.5 For the period 2020/21 to 2037/38 the GTAA has identified a minimum cultural need for 26 pitches and, as a subset of this number, a PPTS need for 26 pitches. It is recommended that the Local Plan acknowledges this range of need.

Meeting permanent Travelling Showperson requirements

- 7.6 There is one Showperson's yard in the district located at Paley Road. This is a long-standing yard and has capacity for 36 plots. According to the owner there are now 18 households living on the yard. The latest evidence would therefore suggest there is sufficient residential capacity on the yard and no additional plots are required.

Meeting transit site/stop over requirements

- 7.7 There are a number of ways to delivery temporary places where Travellers can stop whilst passing through a local authority area. These include transit pitches, stop over places and Negotiated Stopping arrangements. Data on unauthorised encampment activity helps to establish the extent to which transit provision is needed.
- 7.8 Given the low level of unauthorised encampment activity, it is recommended that the council adopts a Negotiated Stopping policy to address any needs arising from households travelling through the district.

Future updating

- 7.9 It is recommended that this evidence base is refreshed on a five-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across the district.

Appendix A: Gypsy and Traveller Fieldwork Questionnaire

	Date and Time			
	Site Reference			
	Address			
	General Data Protection Regulation (2018) and Data Protection	GDPR came into effect from 25th May 2018. This provides new rights for EU citizens to control personal data held about them by organisations		
		This study is being done for the City of Bradford Metropolitan District Council to identify if there is a need for more pitches in the Council area. A report will be prepared based on the findings of these surveys. The information you provide will not		
		The information you provide will not be used to identify you personally, will be kept strictly confidential and not passed onto anyone		
	Can you please say if you are happy to carry on with the questionnaire on this basis?	Yes	No	
1	Pitch/Property Type			
2	No. Statics/mobiles/bricks and mortar			
3	No. tourers			
4	Description of pitch occupancy			
5	No. households			
6	No. concealed households			
7	No. doubled up hhs			
8	Anyone else use this pitch as their home? If so, who			
9	Household characteristics			
		Gender	Age	Relationship to respondent
	Respondent			
	Person 2			
	Person 3			
	Person 4			
	Person 5			
	Person 6			
	Person 7			
	Person 8			
10	Ethnicity			
11	How many bedspaces are there on your pitch?			
12	Overcrowding of home	Y / N		
13	Overcrowding of pitch	Y / N		
14a	Thinking back to when you were 15, were you living on a site, on the roadside or living in bricks and mortar housing	S, R, B&M		
14b	Where were you living? Record district/settlement name			

Travelling questions					
	In 2015, the Government changed its definition of Gypsies and Travellers for planning purposes. To be recognised as a Gypsy Traveller you or someone in your household has to travel. I'm now going to ask a few questions about whether you or someone in your household travels				
15	In the last year have you or someone in your household travelled	Y / N			
16	Previous to the last year, did you or someone in your household travel?	Y / N			
17	Reason(s) for travelling				
18	Do you or a member of your household plan to travel next year?	Y / N			
19	Do you think you or a member of your household will travel each year for the next five years and/or beyond	Y / N			
20	What reasons do you or your household have for not travelling now or in the future?				
Future moving intentions					
21	Are you planning to move in the next 5 years?	Y / N			
22	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where)				
23	What type of dwelling (caravan, trailer, house, flat, bungalow)				
24	Emerging households: Are there any people in your household who want to move to their own pitch in the next 5 yrs?	Y / N			
		HH1	HH2	HH3	HH4
25	Where are they planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where)				
26	What type of dwelling (caravan, trailer, house, flat, bungalow)				
27	Have they travelled / plan to travel	Y/N	Y/N	Y/N	Y/N
28	Scope to expand site	Y / N			
29	No. additional pitches				
30	Scope to intensify pitches	Y / N			
31	No. additional pitches				
32	Is there a need for transit pitches (for people stopping over temporarily) in the district?	Y / N			
33	If so, how many are needed?				
34	Who should manage them (Council, Traveller Community)				
35	Is there a need for more authorised pitches (for people to live on all the time?)	Y / N			
36	If so, how many are needed?				
37	How many years have you lived here?		If less than 6 years, please ask supplementary questions		
38	Are there any vacant pitches on the Site which could be used by another family? If so how many pitches				
Supplementary questions if relevant					
39	Where did you move from? (District)				
40	Were you living on a Private Site, Council Site, Roadside or Bricks and Mortar housing?				
41	When you moved here, was the pitch vacant, a new pitch or was the pitch subdivided				
42	What were the reasons for moving here?				
43	Did you already have a connection with the area (e.g. family or friends living here; or you used to live here?)				
44	Do you know anyone in bricks and mortar housing looking to live on a Site? If so, can you provide contact details				

Appendix B: Glossary of terms

Caravans: Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.

CJ&POA: Criminal Justice and Public Order Act 1994; includes powers for local authorities and police to act against unauthorised encampments.

CRE: Commission for Racial Equality.

DCLG: Department for Communities and Local Government; created in May 2006. Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).

Gypsies and Travellers: Defined by DCLG *Planning policy for traveller sites* (August 2015) as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”. The planning policy goes on to state that, “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”.

Irish Traveller: Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (O’Leary v Allied Domecq).

Mobile home: Legally a ‘caravan’ but not usually capable of being moved by towing.

Pitch: Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. DCLG *Planning policy for traveller sites* (August 2015) states that “For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment”.

Plot: see pitch

PPTS: Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions)

Roadside: Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.

Romany: Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (CRE V Dutton).

Sheds: On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/plot. Some contain a cooker and basic kitchen facilities.

Showpeople: Defined by DCLG *Planning policy for traveller sites* (August 2015) as “Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”.

Site: An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or ‘sheds’. An authorised site will have planning permission. An unauthorised development lacks planning permission.

Slab: An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans).

Stopping places: A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Tolerated site: An unauthorised encampment/site where a local authority has decided not to take enforcement action to seek its removal.

Trailers: Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.

Transit site: A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Unauthorised development: Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not Unauthorised Encampments in that they cannot trespass on their own land – they are therefore Unauthorised Developments and enforcement is always dealt with by Local Planning Authorities enforcing planning legislation.

Unauthorised encampment: Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner’s consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the land owner to take enforcement action in conjunction with the police.

Wagons: This is the preferred term for the vehicles used for accommodation by Showpeople.

Yards: Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as ‘winter quarters’. These ‘yards’ are now often occupied all year around by some family members.