



East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment



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Contents

1. Introduction	6
Definitions	6
Legislation and Guidance for Gypsies and Travellers.....	7
Planning Policy for Traveller Sites	8
Tackling Inequalities for Gypsy and Traveller Communities	9
Funding for New Sites	10
Methodology.....	10
2. Gypsy and Traveller Sites and Population.....	12
Background	12
Caravan Count.....	13
3. Consultation Findings	14
Introduction	14
East Herts Officers and Members and Officers employed in neighbouring areas.....	16
Accommodation Provision: Authorised Sites, Unauthorised Developments/Temporary Permission and Bricks and Mortar.....	17
Accommodation and Management: Roadside Encampments/Transit.....	20
Gypsies and Travellers - Trends, Favoured Locations and Stopping Points.....	21
Future Accommodation Needs	22
Community Cohesion, Employment, Health and Education Issues	25
Cross Boundary and Consultation Activities	26
Future Priorities and Any Additional Issues	27
Wider Stakeholders.....	28
Background	28
Accommodation Provision: Current Site Provision and Bricks and Mortar	29
Accommodation and Management: Roadside Encampments/Transit.....	30
Gypsies and Travellers - Trends, Favoured Locations and Stopping Points.....	31
Future Accommodation Needs: Permanent and Transit provision	31
Community Cohesion, Employment, Health and Education Issues	32
Cross Boundary and Consultation Activities	33
Future Priorities and Any Additional Issues	34
Parish Survey.....	35
Suggestions	35
4. Gypsy and Traveller Population.....	36
Introduction	36
Survey of the Gypsy and Traveller Population.....	36

Connections with the Area and Length of Residence	36
Satisfaction with Living at Current Address	37
Housing Needs	37
Local services.....	37
Travelling.....	37
Bricks and Mortar.....	37
Additional interview with a Traveller.....	38
5. Travelling Showpeople	39
Introduction	39
Survey of the Travelling Showpeople Population	40
Connections with the Area.....	40
Vehicles	42
Bricks and mortar.....	42
Health Problems.....	43
6. Future Pitch Provision for Gypsies and Travellers.....	44
Pitch Provision for Gypsies and Travellers	44
Supply of pitches	45
Current Need.....	45
Future Need	45
Current Gypsy and Traveller Site Provision.....	45
Additional Site Provision: Current Need	46
Current Unauthorised Developments.....	46
Concealed Households.....	46
Bricks and Mortar.....	47
Additional Site Provision: Future Need	48
Temporary Planning Permissions.....	48
New Household Formation	48
In-migration from Other Sources.....	49
Overall Needs for East Hertfordshire.....	50
Requirement by Time Periods.....	51
Public and Private Provision	51
Transit/Emergency Stopping Site Provision	51
7. Future plot Provision for Travelling Showpeople.....	53
Need for Plots for Travelling Showpeople	53
Current Travelling Showperson Yard Provision.....	53
Additional Yard Provision: Current Need	53
Current Unauthorised Developments.....	53
Concealed Households.....	53
Bricks and Mortar.....	54
Additional Site Provision: Future Need	54

Temporary Planning Permissions.....	54
New Household Formation	54
In-migration from Other Sources.....	54
Overall Needs for Travelling Showpeople Plots in East Hertfordshire.....	55
Requirement by Time Periods.....	55
Public and Private Provision.....	55
Appendix A: Existing Gypsy and Traveller Residential Sites in East Hertfordshire.....	56
Appendix B: Existing Travelling Showpeople Residential Yards in East Hertfordshire.....	57

1. Introduction

The Survey

- 1.1 Opinion Research Services (ORS) were commissioned by the East Herts Council to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.
- 1.2 The study seeks to provide an evidence base to enable the authority to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. The main objective of this study is to provide the Council with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in East Herts during the period until 2031 in five year sections covering 2014-2018, 2018-2023 and 2023-2028 and 2029-2031. It also required the identification of whether or not East Hertfordshire needs to plan for the provision of transit sites or emergency stopping places.
- 1.3 We would note at the outset that the study covers the needs of Gypsies, Irish Travellers, New Travellers and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.
- 1.4 This document is the main report and summarises the key findings of the study, in particular, where they relate to existing policies or have implications for future policy decisions across the study area.

Definitions

- 1.5 For the purposes of the planning system, 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 dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such. (Planning Policy for Traveller Sites, CLG, March 2012)

- 1.6 Within the main definition of Gypsies and Travellers, there are a number of main cultural groups which include:
 - » Romany Gypsies;
 - » Irish Travellers; and
 - » New Travellers.
- 1.7 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010.

- ^{1.8} Alongside Gypsies and Travellers, a further group to be considered are Travelling Showpeople. They are defined as:
- ^{1.9} 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 family's or dependent's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. (*Planning Policy for Traveller Sites, CLG, March 2012*)

Legislation and Guidance for Gypsies and Travellers

- ^{1.10} Decision-making for policy concerning Gypsies and Travellers and Travelling Showpeople 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 pieces of legislation and guidance are relevant when constructing policies relating to Gypsies and Travellers and Travelling Showpeople:

- » Planning Policy for Traveller Sites 2012;
- » National Planning Policy Framework 2012;
- » Gypsy and Traveller Accommodation Needs Assessments Guidance October 2007;
- » Environmental Protection Act 1990 for statutory nuisance provisions;
- » The Human Rights Act 1998, when making decisions and welfare assessments;
- » The Town and Country Planning Act 1990 (as subsequently amended);
- » Homelessness Legislation and Allocation Policies;
- » Criminal Justice and Public Order Act 1994 (sections 61, 62);
- » Anti-social Behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour);
- » Planning and Compulsory Purchase Act 2004;
- » Housing Act 2004 which requires local housing authorities to assess the accommodation needs of Gypsies and Travellers and Showpeople as part of their housing needs assessments. This study complies with the this element of government guidance;
- » Housing Act 1996 in respect of homelessness.

- ^{1.11} To focus on Gypsies and Travellers, the Criminal Justice and Public Order Act 1994 (Sections 77, 78) is particularly important with regard to the issue of planning for Gypsy and Traveller site provision. This repealed the duty of local authorities to provide appropriate accommodation for Gypsies and Travellers. However, Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.

- ^{1.12} For site provision, the previous Labour Government guidance focused on increasing site provision for Gypsies and Travellers and Travelling Showpeople and encouraging local authorities to have a more inclusive approach to Gypsies and Travellers and Travelling Showpeople within their Housing Needs Assessment. The Housing Act 2004 required local authorities to identify the need for Gypsy and

Traveller sites, alongside the need for other types of housing, when conducting Housing Needs Surveys. Therefore, all local authorities were required to undertake accommodation assessments for Gypsies and Travellers and Travelling Showpeople either as a separate study such as this one, or as part of their main Housing Needs Assessment.

- ^{1.13} Local authorities were encouraged rather than compelled to provide new Gypsy and Traveller sites by central government. Circular 1/06 'Planning for Gypsy and Traveller Caravan Sites', released by the CLG in January 2006, replaced Circular 1/94 and suggested that the provision of authorised sites should be encouraged so that the number of unauthorised sites would be reduced.
- ^{1.14} The Coalition Government announced that Planning for Gypsy and Traveller Caravan Sites (Circular 01/06) was to be repealed, along with the Regional Spatial Strategies which were used to allocate pitch provision to local authorities. The CLG published 'Planning Policy for Traveller Sites' in March 2012 which set out the Government's planning policy for traveller sites. It should be read in conjunction with the National Planning Policy Framework.

Planning Policy for Traveller Sites

- ^{1.15} The document 'Planning Policy for Traveller Sites' sets out the direction of government policy. Among other objectives the new policies' aims in respect of Traveller sites are (Planning Policy for Traveller Sites Page 1-2):
- » that local planning authorities should make their own assessment of need for the purposes of planning;
 - » to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
 - » to encourage local planning authorities to plan for sites over a reasonable timescale;
 - » that plan-making and decision-taking should protect Green Belt from inappropriate development;
 - » to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
 - » that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
 - » for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
 - » to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
 - » to reduce tensions between settled and traveller communities in plan-making and planning decisions;
 - » to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure;

- » for local planning authorities to have due regard to the protection of local amenity and local environment.

^{1.16} In practice the document states that (Planning Policy for Traveller Sites Page 3):

Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

^{1.17} Local planning authorities should, in producing their Local Plan:

- » identify and update annually, 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 to 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 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.

^{1.18} A key element to the new policies is a continuation of previous government policies. Local authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' also notes on Page 3-4 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.

^{1.19} Therefore, criteria based planning policies sit at the heart of the new guidance, irrespective of whether need is identified or not.

Tackling Inequalities for Gypsy and Traveller Communities

^{1.20} In April 2012 the government issued a further document relating to Gypsies and Travellers in the form of 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers (CLG April 2012)'.

^{1.21} The report contains 28 commitments to help improve the circumstances and outcomes for Gypsies and Travellers across a range of areas including:

- » Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children;

- » Identifying ways to improve health outcomes for Gypsies and Travellers within the proposed new structures of the NHS;
- » Encouraging appropriate site provision; building on £60m Traveller Pitch Funding and New Homes Bonus incentives;
- » Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system;
- » Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities and working with the financial services industry to improve access to financial products and services;
- » Sharing good practice in engagement between Gypsies and Travellers and public service providers.

Funding for New Sites

- ^{1.22} The Coalition Government policies also involve financial incentives for new affordable pitch provision in the form of the New Homes Bonus. For all new annual supply of pitches on local authority or Registered Social Landlord owned and managed sites, local councils receive a New Homes Bonus equivalent to council tax (based on the national average for a Band A property), plus an additional £350 per annum for six years. This equates to around £8,000 pounds per pitch.
- ^{1.23} Direct grant funding is also available for Gypsy and Traveller sites. The Homes and Communities Agency (HCA) took over delivery of the Gypsy and Traveller Sites Grant programme from CLG in April 2009. Since then, they have invested £16.3m in 26 schemes across the country to provide 88 new or additional pitches and 179 improved pitches. The HCA welcomes bids from local authorities, housing associations and traveller community groups working with Registered Providers.
- ^{1.24} The HCA has now confirmed allocations for all of its £60m of future funding which will support 96 projects around the country for the provision of new Gypsy and Traveller sites and new pitches on existing sites, as well as the improvement of existing pitches.
- ^{1.25} While all HCA funds for Gypsy and Traveller pitches have now been allocated, further funding may become available as a result of slippage over the course of the programme. Providers are advised to continue to work closely with HCA area teams to develop their proposals should any funding become available.

Methodology

- ^{1.26} This section sets out the methodology we have followed to deliver the outputs for this study. Over the past 10 years ORS have developed a methodology which provides the required outputs from a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment and this has been updated in light of Planning Policy for Traveller Sites.
- ^{1.27} The stages overleaf provide a summary of the process undertaken by ORS, with more information on each stage provided in the appropriate section of the report.

Stage 1: Background

^{1.28} At the outset of the project we sought to understand the background to Gypsy and Traveller and Travelling Showpeople population in East Herts. The study sought to identify the location of all known sites in the study area and the number of pitches or plots on each one. The study also gathered information from recent caravan counts in the local authority and information held by the local authority on unauthorised encampments as well as waiting lists for public sites which are managed by the council.

Stage 2: Stakeholder Engagement

^{1.29} This study includes extensive stakeholder engagement with council officers from East Herts Council, neighbouring councils and other stakeholders such as representatives from Gypsy and Traveller interest groups and local service providers. The aim of this engagement was to help understand the current situation in the study area, in particular to identify households not on known existing sites and also to discuss Duty to Cooperate issues with neighbouring councils. A separate consultation was also carried out with Parish and Town Councils and community groups in the study area.

Stage 3: Household Survey

^{1.30} The research methodology for identifying the housing needs of Gypsies and Travellers adopted in this report was largely based upon face to face interviews with Gypsies and Travellers across East Herts. The survey questionnaire has been developed over the past 10 years, with significant input from Gypsy and Traveller representative groups, most notably the Derbyshire Gypsy Liaison Group. We sought to undertake a census of Gypsy and Traveller households in November 2013. 52 interviews were attempted with Travelling Showpeople during this period. No interviews were carried out with any households living in bricks and mortar. Due to the small size of the Gypsy and Traveller population we have not provided any data relating to this group in this report, but we do provide data for Travelling Showpeople.

Stage 4: Future Pitch and Plot Requirements

^{1.31} The methodology used by ORS to calculate future pitch and plot requirements has been developed over the past 10 years and has drawn on lessons from both traditional housing needs assessments and also best and worst practice for Gypsy and Traveller and Travelling Showpeople Accommodation Assessments conducted across the country.

^{1.32} The overall principles behind assessing future needs are relatively simple and were set out in a consultation document sent to stakeholders at the outset of the project. The residential and transit pitch requirements for Gypsies and Travellers are identified separately from those for Travelling Showpeople and for each group the requirements are identified in 5 year periods to 2031.

Stage 5: Conclusions

^{1.33} This stage draws together the evidence from Stages 1 to 4 to provide an overall summary of the requirements for Gypsies and Travellers and Travelling Showpeople in East Herts.

2. Gypsy and Traveller Sites and Population

Background

- ^{2.1} A Strategic Housing Market Assessment focuses upon the number of dwellings required in an area, and how many of these should be affordable. The central aim of this study was to follow a similar format for Gypsy and Traveller and Travelling Showpeople accommodation requirements.
- ^{2.2} One of the main considerations of this study is the provision of pitches and sites for Gypsies and Travellers. A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers or Travelling Showpeople. However, Travelling Showpeople sites are also sometimes referred to as yards, while the space occupied by one household is commonly referred to as a plot. Throughout this study, the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the East Herts area.
- ^{2.3} The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of Gypsy and Traveller sites is the publicly-provided residential site, which is provided by the local authority or by a registered provider (usually a housing association). Places on public sites can be obtained through a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing). There are currently no public sites in the study area.
- ^{2.4} The alternative to public residential sites is private residential sites for Gypsies and Travellers and Travelling Showpeople. 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.
- ^{2.5} The Gypsy and Traveller and Travelling Showpeople population may also utilise other forms of sites due to their mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few weeks to a period of months. An alternative 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 than a transit site. Both of these two types of sites are designed to accommodate Gypsies and Travellers whilst they travel.
- ^{2.6} Also to be considered are unauthorised developments and encampments. An unauthorised development refers to the occupation of land which is owned by the Gypsies and Travellers themselves but for which they do not have planning permission to use for residential purposes. An unauthorised

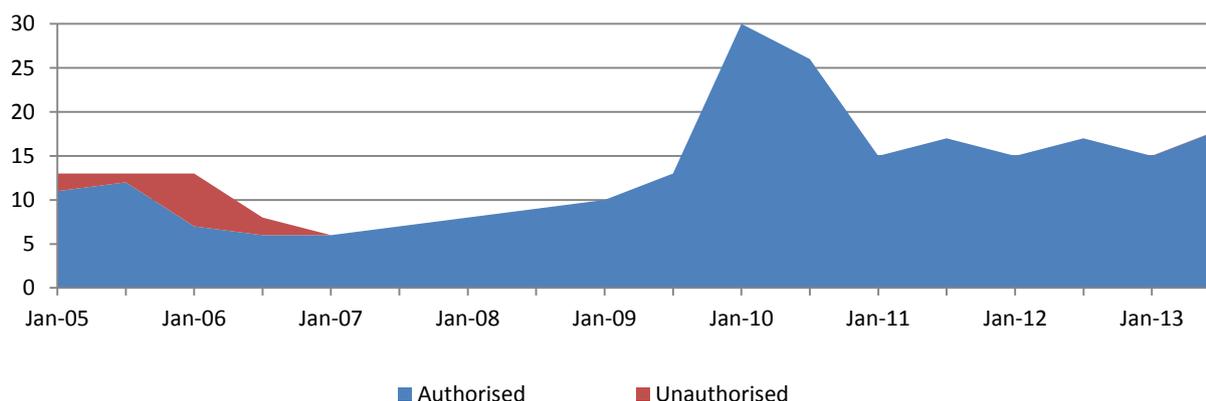
encampment refers to the unauthorised occupation of land which is not owned by the Gypsies and Travellers.

Caravan Count

- ^{2.7} One source of information available on the Gypsy and Traveller caravan numbers is the bi-annual survey of Gypsy and Traveller caravans which is conducted by each local authority in England on a specific date in January and July of each year. This count is of caravans and not households which makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. It must also be remembered that the count is conducted by the local authority on a specific day and that any unauthorised encampments which occur on other dates will not be recorded.
- ^{2.8} The chart below shows the numbers of caravans counted on authorised and unauthorised sites in East Hertfordshire for the last eight years. These counts do not include any Showpeople caravans in the area. The caravan count figures are provided for illustrative purposes to demonstrate the relative size of the populations and are not used in any modelling of future pitch requirements in this study.

Figure 1

Gypsy Caravan Count for East Hertfordshire: January 2005– January 2013 (Source: CLG Bi-annual Local Authority Caravan Count)



3. Consultation Findings

Introduction

- 3.1 In order to set the context of the research and ensure the study is based on a sound understanding of the relevant issues, a list of 57 contacts was drawn up by the Council and ORS with the aim of carrying out telephone interviews.
- 3.2 30 individual interviews were undertaken and the following is a breakdown of each consultation group:
- » 4 Members;
 - » 8 Officers;
 - » 7 Officers from surrounding areas;
 - » 11 Stakeholders.
- 3.3 ORS conducted 30 semi-structured and in-depth telephone interviews or received written responses in February 2014 = 53% response. The interviews typically lasted between 30- 40 minutes.
- 3.4 Reasons for not being able to conduct interviews were:
- » Those requested by e-mail to provide telephone contact details did not do so;
 - » Colleagues within the same organisation had already been interviewed and nothing further could be added;
 - » The person contacted felt they did not have any information that would be of help to the study;
 - » The person contacted had changed employment;
 - » Those contacted did not respond.
- 3.5 The following neighbouring authorities chose to take part in the GTAA; written responses were received from or interviews were conducted with officers from: Broxbourne Borough Council, Epping Forest District Council, Harlow Council, North Hertfordshire District Council, Stevenage Borough Council, Uttlesford District Council and Welwyn Hatfield Borough Council.
- 3.6 The aim of interviewing nearby authorities is to identify any migration between districts, what routes may be travelled, background information on the framework within which the authorities operate and any perceptions they may have regarding Gypsy, Traveller and Travelling Showpeople communities within their operational areas.
- 3.7 The Officers interviewed from East Herts and neighbouring authorities work in the following departments/services: Planning and Building Control, Planning and Development Control, Strategic

Planning, Planning and Economic Development, Development Management, Community Services, Community Safety and Health, Planning Policy, Environmental Health, Housing and Neighbourhood.

- 3.8 ORS also interviewed wider Stakeholders and these included interviews undertaken with individuals who have knowledge and experience of working with Gypsies and/or Travellers. Responses have been received from Hertfordshire County Council (Gypsy Section, Access to Education for Travellers, Refugees and Asylum Seekers & Trading Standards Department), CVS East Herts & Broxbourne, Hertfordshire Partnership University NHS Foundation Trust, Showmen's Guild of Great Britain, Association of Independent Showmen, Hertfordshire Fire and Rescue and Registered Providers (RPs).
- 3.9 With the aim of obtaining bricks and mortar contacts ORS interviewed representatives from the following Registered Providers:
- » Aldwyck Housing Association;
 - » Circle Housing South Anglia;
 - » Paradigm Housing Group.
- 3.10 East Herts Council operates a choice based lettings system called HomeOption and this is in partnership with Uttlesford and Epping Forest District Councils and Chelmsford and Brentwood Borough Councils. Each fortnight, a free sheet is published advertising available Council and housing association properties in each of the council areas. The scheme enables households on the Housing Register to register their interest for a home they want to live in rather than the Council choosing the property for them.
- 3.11 All interviewees, including Members, were asked whether they could identify or knew any Gypsies, Travellers or Travelling Showpeople living in bricks and mortar accommodation and if so, could they give a letter from ORS to them. The letter from ORS asks whether they would like to be involved in the Accommodation Needs Assessment consultation.
- 3.12 RPs were also asked how well they are able to identify these households within their current monitoring mechanisms and whether there are specific issues in relation to housing people from the Gypsy, Traveller or Travelling Showpeople communities.
- 3.13 RPs, together with other organisations found they were able to provide very little data through their monitoring systems. The majority of Officers confirmed they knew of people from the Gypsy, Traveller or Travelling Showpeople communities living in their areas or in their properties because of Officer experience/knowledge, but not because of the analysis of statistical data.
- 3.14 The reasons given for not being able to accurately provide information was due to people not self-declaring their ethnicity during the housing application process or it was not possible to extrapolate this information from data sets/computer systems and/or tended generally not to be included in monitoring.
- 3.15 The Consultation section has been split into two distinct sections:
- » Officers and Members of East Herts Council and Officers representing neighbouring authority areas;
 - » Wider Stakeholders.

- ^{3.16} Due to issues around data protection and in order to protect the confidentiality of those who took part, this Section does not include verbatim comments and it aims to represent a summary of the views and responses expressed by Officers, Members and Stakeholders during the consultation interview process.
- ^{3.17} The Consultation Section may, in some places, be representative of personal views and opinions and not necessarily the views of the organisation the interviewee works for. Some respondents also noted that at times their reply is based on a Hertfordshire-wide experience and not specifically to East Herts but a note is made of this in the Report.
- ^{3.18} The Consultation Section is based on information provided during the interview process and may not have a direct correlation to the factual information passed to ORS from the local authority e.g. number and names of sites.

East Herts Officers and Members and Officers employed in neighbouring areas

Background

- ^{3.19} Officers and Members from East Herts Council stated that the Council has been working to meet the small amount of need identified in the last GTAA through successfully granting permissions to expand existing private sites; this has on occasions been granted retrospectively.
- ^{3.20} Officers and Members from East Herts Council confirmed that granting permission for a further 13 pitches in the district since 2008 has resulted in additional need being met for Gypsies and Travellers over that identified in the last GTAA¹. However, a minority of Officers noted that the need for 9 plots identified in the Regional Spatial Strategy (RSS), now redundant, for Travelling Showpeople has not been met.
- ^{3.21} Some Council Officers from East Herts Council suggested that the reasons for not meeting the needs of Travelling Showpeople in the area are due to the site at Rye House being constrained on all sides and therefore the site cannot be expanded. There has also been difficulty in finding a new site large enough to accommodate both the additional numbers of Travelling Showpeople and their equipment.
- ^{3.22} The majority of Officers responding from East Herts Council confirmed that no new sites have been developed and there is currently no public provision in the district.
- ^{3.23} Officers from neighbouring areas confirmed the following:
- » Broxbourne Borough Council – A GTAA was undertaken in 2006 with East Herts and other local authorities in Hertfordshire which led to the Council undertaking a site identification study in 2007/8. However, due to the change in government and the abolition of the Regional Spatial Strategy the work was believed to be unsound. The Council has now commissioned a new GTAA and a Travelling Showpeople Accommodation Assessment in order to inform the new local plan;
 - » Epping Forest District Council – The Council's last GTAA identified a need for approximately 34 pitches and that was followed by the preparation of a Gypsy and Traveller Development Plan

¹ GTAA – Gypsy and Traveller Accommodation Assessment

Document (DPD). Since then because of a change in government direction, this work has been abolished but has encouraged the local Gypsy and Traveller community to take the opportunity to submit professionally prepared planning applications which has seen an increase of 47 pitches on private authorised sites;

- » Harlow Council – Following the changes to planning legislation the Council, through the Essex Planning Officers Association (EPOA) and with all other districts in Essex, are undertaking a new Gypsy and Traveller Accommodation Assessment. This will provide an up-to-date assessment of need that will be reflected in the policies and proposals of the New Local Plan for Harlow;
- » North Hertfordshire District Council – A Northern and Eastern Hertfordshire GTAA was undertaken in 2006 which identified a low need for site provision in the area. What need there is has been met by expanding an authorised private site;
- » Stevenage Borough Council – The Council undertook a GTAA in 2006 which identified a small need for 3 pitches. A new GTAA has recently been undertaken that identifies a short term requirement for 3 pitches to 2018 with an estimated need for an additional 3-5 pitches in each 5 year period thereafter;
- » Uttlesford District Council – has undertaken a call for sites and is currently undertaking a new GTAA where, if need is identified, the Council will be looking to allocate sites;
- » Welwyn Hatfield Borough Council – A GTAA was carried out in 2011 and published 2012. A call for sites was also carried out in 2013 to inform future site allocations.

Accommodation Provision: Authorised Sites, Unauthorised Developments/Temporary Permission and Bricks and Mortar

- ^{3.24} Officers and Members from East Herts identified three privately owned sites that currently accommodate 20 caravans
- ^{3.25} Some Officers responding from East Herts Council highlighted that all sites are privately owned by individuals or families and one site in Rye House is owned by Travelling Showpeople operating showground fairs.
- ^{3.26} Few Officers responding from East Herts highlighted any issues on the authorised sites other than on occasions there are breaches of planning permission because non Gypsies or Travellers are using the sites or where sites are being expanded without planning permission.
- ^{3.27} Members responding from East Herts Council generally believe the private sites are well run and appear not to cause any problems to those living in the local vicinity.
- ^{3.28} Officers in neighbouring authorities highlighted the following authorised sites in their areas:
- » One private site in North Hertfordshire District Council area – for one family that has been expanded to meet the needs identified in the Council’s last GTAA;
 - » One public site in Epping Forest District Council area managed by Hertfordshire CC – 16 pitches;

- » One private Travelling Showpeople site in Epping Forest District Council area – 9 yards;
- » One public site in Broxbourne District Council area - 15 pitches;
- » Two private sites in Broxbourne District Council area - 7 pitches;
- » Two authorised Travelling Showpeople sites in Broxbourne District Council area (one of which is believed to be vacant);
- » Two private sites in Welwyn Hatfield Borough Council area – 16 pitches;
- » One public site in Welwyn Hatfield Borough Council area owned and managed by Hertfordshire CC – 39 pitches;
- » One private site for Travelling Showpeople in Welwyn Hatfield Borough Council area;
- » One public site in Stevenage Borough Council area - 17 pitches;
- » One public site of 17 pitches in Uttlesford and a large number of private sites with a total of 43 pitches.
- » Two public sites in Harlow Council area managed by Essex County Council -44 pitches.

^{3.29} The general consensus of Officers responding from neighbouring authorities is that the public and private sites are, in the majority of cases, meeting the needs of residents and there are no current issues in relation to anti-social behaviour or community cohesion.

^{3.30} One Officer in a neighbouring area highlighted that on a private site there have been breaches of the planning conditions because some of the pitches have been rented out to non-Gypsies or Travellers. This is believed to be because the site can accommodate more pitches than there is need in the area.

^{3.31} One Officer in a neighbouring area highlighted the difficulties in determining whether a Travelling Showpeople site is under-occupied or not because of the transient nature of those using the site in their area.

^{3.32} One Officer in a neighbouring area confirmed that there have been issues on some sites in terms of over-occupation (doubling up on pitches) and some of the older sites in their area being in remote locations with poor accessibility to facilities.

^{3.33} One Officer responding from a neighbouring area reported they had experienced difficulty with a public site which was being dominated by a family resident on the site. This had led to some residents leaving the site and it being under-occupied as a result.

^{3.34} Officers and Members responding from East Herts Council gave few examples of unauthorised developments or those with temporary planning permission other than a site at Sawbridgeworth. The site has recently been subject to appeal and the Inspector upheld the greenbelt argument. In addition to this the site has, on occasions, been subject to flooding. Officers further confirmed that approximately 12 caravans had been on the site, but it has recently been vacated and the hard standing is in the process of being removed.

- 3.35 Officers responding from neighbouring authority areas gave few examples of unauthorised developments and/or sites with temporary permissions or whether if these do occur whether they are tolerated.
- 3.36 Officers responding from neighbouring authorities confirmed they have sites with temporary permissions and unauthorised developments as listed below:
- » One authorised site (12 pitches) with 6 temporary pitches which runs out in 4 years' time – North Hertfordshire DC;
 - » Ten pitches with temporary permission – Epping Forest District Council;
 - » Twelve to thirteen caravans on an unauthorised development – Epping Forest District Council;
 - » One authorised site with a number of unauthorised pitches (some authorised due to length of time) – Broxbourne Borough Council;
 - » One temporary site allowed on appeal until 2016 – Welwyn Hatfield Borough Council.
- 3.37 One Officer in a neighbouring area suggested that the reason there are unauthorised developments or sites that have temporary permission is because there is not enough room on the transit site at South Mimms and there is a lack of pitches on permanent sites in their area.
- 3.38 One Officer responding from East Herts Council knew that a Traveller had applied for bricks and mortar accommodation and that it was approximately 6-7 years ago.
- 3.39 Some Officers responding from East Herts believe that one or two of those who had been residing on the unauthorised site in Sawbridgeworth have access to bricks and mortar housing.
- 3.40 One Officer responding from East Herts Council confirmed that the current housing application form does not include options for Roma Gypsies or Irish Travellers for example, to self-declare their ethnicity and this makes it difficult to identify these communities.
- 3.41 Officers responding from East Herts Council generally believed that identifying Gypsies, Travellers or Travelling Showpeople living in bricks and mortar accommodation may be difficult as they may not wish to identify themselves and/or may not wish to be included in the consultation for the GTAA; it was suggested that if there is a level of trust between Gypsies, Travellers and Travelling Showpeople and those in authority then it would be more likely they would wish to be involved.
- 3.42 Some Officers responding from East Herts Council highlighted that little data in relation to Gypsies and Travellers has been identified from the last census.
- 3.43 Some Officers responding from East Herts Council put forward that as there is little knowledge of whether Gypsies, Travellers or Travelling Showpeople are accessing affordable housing it may be because such housing does not suit their needs. Some Officers suggested this may be because bricks and mortar housing does not meet their cultural needs and/or identity.
- 3.44 Members responding from East Herts Council did not know of any Gypsies, Travellers or Travelling Showpeople living in their wards other than those living on private sites, although they did not know those people personally.

- 3.45 The majority of Members responding from East Herts Council hoped that any Gypsies or Travellers or Travelling Showpeople would welcome the opportunity to be involved in the consultation for this study as Members believe it is in the best interests for these communities to have their voices heard.
- 3.46 The majority of Members responding from East Herts Council had read that bricks and mortar accommodation may not meet the needs of Gypsies, Travellers and Travelling Showpeople. One Member suggested that as long as these communities were not transient then bricks and mortar housing was suitable providing the curtilage had space to store a caravan.
- 3.47 Officers responding from neighbouring authorities were unable to provide information regarding Gypsies, Travellers or Travelling Showpeople who may be living in bricks and mortar accommodation in their areas and who may wish to move into the East Herts area.
- 3.48 Where GTAAs have been undertaken in nearby local authority areas very little information about those living in bricks and mortar accommodation and their needs have been identified. Officers reported even if they believe they have Gypsies, Travellers or Travelling Showpeople living in bricks and mortar accommodation in their area, it is a challenge to often identify any such households when undertaking a GTAA.
- 3.49 Those local authorities who identified and consulted with Gypsies, Travellers or Travelling Showpeople living in bricks and mortar housing found they have no intention of moving out of their accommodation back onto sites. However, one authority reported that the Hertfordshire Gypsy and Traveller section has suggested that there may be a demand for pitches from those living in bricks and mortar accommodation. Those on a waiting list for Hertfordshire CC managed sites, none of which are in East Herts, highlighted 57 households currently looking to apply for a pitch² currently living in bricks and mortar accommodation.
- 3.50 The majority of Officers responding from neighbouring local authorities believe that Gypsies, Travellers or Travelling Showpeople will be less inclined to take part in the consultation for the East Herts GTAA and GTAAs generally.
- 3.51 The majority of Officers responding from neighbouring local authorities believe that bricks and mortar housing does not meet the needs of Gypsies, Travellers and Travelling Showpeople and this could be evidenced by the low numbers of households identified in GTAAs.

Accommodation and Management: Roadside Encampments/Transit

- 3.52 Officers and Members responding from East Herts Council agreed that roadside encampments do not regularly occur in the area and there has been a significant decline over the last 15 years. Few examples were given as to the reasons why encampments happen other than Gypsies, Travellers or Travelling Showpeople are travelling through the area and stop for a couple of days and move on. One Officer confirmed that in the last 12 years, only one letter has been issued and that was for a group encamped on highway land.

² Hertfordshire CC monitoring as at December 2013.

- 3.53 One Officer from the Council made mention of there having been two encampments recently in the Marshgate area of Hertford. One of the incursions consisted of two caravans (Irish Travellers) and the other 23 caravans, a separate group dealt with by the Police; both groups only stayed for a few days.
- 3.54 The majority of Members responding from East Herts Council believe the Council has a robust approach to encampments and that the Council works closely with the Police on these matters.
- 3.55 Officers responding from nearby local authority areas confirmed they encounter few instances of unauthorised encampments and the level has decreased over recent years.
- 3.56 One Officer in a nearby local authority confirmed that they had one family who regularly moved around their area and is now on the Hertfordshire CC waiting list for a pitch in their area.
- 3.57 When encampments do occur in nearby local authority areas it is thought that Gypsies or Traveller are visiting relatives or are attending a specific occasion such as a funeral or they are travelling through.
- 3.58 Officers from East Herts Council confirmed there is currently no transit site in the District and it is believed there is no need for such provision.
- 3.59 Hertfordshire County Council manages a transit site at South Mimms which is in regular use. It was mentioned that at times this was overcrowded.

Gypsies and Travellers - Trends, Favoured Locations and Stopping Points

- 3.60 When asked to consider trends in relation to these communities Officers from East Herts believe there have been no significant trends. Some officers believe that any increase in numbers of Gypsies and Travellers in particular are having their accommodation needs met by the slow expansion of the three private sites.
- 3.61 Officers responding from East Herts Council acknowledged that the area had seen no incursions by Travelling Showpeople in the area and there are no issues in terms of unauthorised arrivals, although it is hoped that this study will give an indication of any future needs or trends for this community. One Officer mentioned the fact that across the country it is thought that the Travelling Showpeople way of life is on the decline.
- 3.62 Members agree they have seen no trends especially with regard to the number of Gypsies, Travellers or Travelling Showpeople in East Herts. One Member also cited that when consultation had been undertaken with regard to a call for sites some local Gypsies had signed a petition against such proposals, because they did not want to have any more Gypsies or Travellers or Travelling Showpeople move into the area.
- 3.63 The majority of Officers responding from neighbouring authorities believe they have seen little change over recent years, although two Officers noted they have seen an increase in sites gaining permanent and temporary planning permission, often retrospectively.
- 3.64 Two Officers from neighbouring areas confirmed they have experienced an increase in planning applications and one Officer confirmed that in their local authority area they had seen an increase in planning applications for private owned sites about 4-5 years ago which was linked to the DPD consultation, but since then applications have tailed off.

- 3.65 One Officer in a neighbouring area believes they have seen an increase in the number of Irish Travellers in their area and another Officer believes they have seen an increase in the number of roadside encampments over the past year.
- 3.66 Officers from East Herts Council in the main do not believe there are favoured areas or stopping points in the district, other than the areas where the current private authorised sites are established. Furthermore, some Officers pointed out that where unauthorised developments have taken place, these have been in rural areas outside of current development boundaries because land is cheaper.
- 3.67 Members did not mention any areas they believe to be favoured by Gypsies, Travellers or Travelling Showpeople in the Council's area.
- 3.68 Officers responding from neighbouring local authority areas believe the following locations could be favoured by Gypsies, Travellers or Travelling Showpeople:
- » Roydon;
 - » Nazeing;
 - » Proximity to A1M;
 - » Cheshunt.

Future Accommodation Needs

- 3.69 Officers responding from East Herts Council believe there is sufficient site provision in the area. Some officers stated this is their perception and they are unsure of the actual need, including the type of provision that may be needed, until the results of this study are completed.
- 3.70 Some Officers responding from the Council highlighted they believe there is sufficient provision in the area because there are few encampments and on some sites the pitches are believed to be rented out to those who are not Gypsies or Travellers, thus breaching planning conditions.
- 3.71 Some Officers responding from East Herts Council confirmed their knowledge of Travelling Showpeople in the area would be reliant on this study because they are currently unaware of any changes in circumstances for this community, other than the need for additional pitches and the challenges in finding a suitable site.
- 3.72 Officers responding from East Herts Council generally believe the need for a transit site is unlikely because the area does not experience large numbers of incursions. However, one Officer highlighted that because all the current sites are private, there is no transit provision in the area to move any encampment to should there be a need to take enforcement action.
- 3.73 The majority of Members agree there is sufficient site provision in the East Herts area. One Member did respond that it is likely that the new study could identify a small additional need and that a new site would be justified; this, the Member suggested is likely to be problematic to achieve because of the lack of affordable land especially when any new Gypsy or Traveller or Travelling Showpeople site would be in direct competition with the need for affordable housing.
- 3.74 Three Officers responding from nearby authority areas confirmed there is a need in their areas for additional site provision. One Officer suggested that as the Hertfordshire CC waiting list holds 161

households waiting for pitches in the Hertfordshire area it would suggest there is a need for additional site provision in the Hertfordshire area.

- 3.75 An Officer from a neighbouring area highlighted that the South Mimms transit site could be contributing to the high level of need for permanent provision in the Hertfordshire area and a holistic approach should be considered by all local authorities in Hertfordshire.
- 3.76 One Officer in a neighbouring area highlighted a public site in Holwell where a need for additional pitches has been identified. The site is close to the East Herts boundary which may indicate that some of the need could be arising from East Herts, but that has yet to be evidenced.
- 3.77 The majority of Officers responding from neighbouring areas believe they are meeting the needs identified in their most recent GTAA's.
- 3.78 One Officer reported that in their area there is an over provision in their District.
- 3.79 A minority of Officers from neighbouring authority areas stated there is a lack of information about the needs of Travelling Showpeople in their areas and research will be undertaken in due course.
- 3.80 In terms of the criteria to be considered when determining where a site should be located Officers and Members from East Herts Council and Officers responding from neighbouring local authority areas stated the following views:
- » Reference should be made to government guidance and existing criteria based policies and emerging policies such as East Herts Council's HOU7;
 - » Sites should be near local services and facilities such as shops, GPs, public transport and schools;
 - » Accessible to local road networks such as M11 or A10 without causing safety issues;
 - » Access to services/facilities on site such as water, sanitation, rubbish collection and electricity;
 - » Sites should have adequate parking, storage, turning and servicing on site;
 - » Consideration should be made to include site provision as part of any future major housing development in the same way as affordable housing is negotiated as part of Section 106 planning agreements;
 - » An impact assessment should be undertaken in relation to the local environment/environmental constraints to ensure that any proposed site will suit the local environment and community and therefore remain sustainable.
- 3.81 Officers responding from East Herts Council gave a balance of views as to whether sites should be located in rural or more urban areas.
- 3.82 The majority of Officers from East Herts Council did not express a view as to where any sites, if need is evidenced, should be located. One Officer suggested that an existing private site had recently had permission granted for a further 6 pitches, but there is room on the site to take more should need be evidenced.

- 3.83 One Officer responding from East Herts Council confirmed that should more sites be needed, consultants will be employed to undertake a new study to identify suitable sites and their potential for development and that will help the Council plan the way forward.
- 3.84 The majority of Members did not express a view as to the location of new sites, if a need is identified. One Member suggested that disused quarries and other derelict Council amenity areas should be considered suitable, although in the previous scoping exercise they had been classed as unsuitable; another Member further confirmed that the Council had already looked at where potential sites could be located and this had proved highly sensitive.
- 3.85 The majority of Officers responding from neighbouring authorities were unable to suggest locations within the East Herts area, although if a need is identified sites should be considered in non-green belt areas and based on clear and transparent criteria.
- 3.86 One Officer responding from a neighbouring area believes that an opportunity exists for a new site to be provided to the east of Welwyn Garden City on land within East Herts as part of a broad location for growth.
- 3.87 The majority of Officers and Members responding from East Herts Council stated that private sites would be preferable if a need for more sites is identified. Some Officers further stated that private sites tended to be well managed and there have been few issues in relation to management.
- 3.88 One Member suggested that public owned and managed sites would be preferable to private sites because of ensuring that maintenance standards met a satisfactory level.
- 3.89 Some Officers responding from East Herts Council highlighted the District currently has private sites only and those who cannot afford to purchase land are not being provided for; this may mean that Gypsies, Travellers and Travelling Showpeople are at a disadvantage when compared to those who cannot afford to buy bricks and mortar housing because affordable housing is available through the Council.
- 3.90 Some Officers responding from East Herts Council recognised that should need be identified it would be important to ensure that the needs of Gypsies and Travellers and Travelling Showpeople are clear for each group because any need could not be met by providing one site to accommodate a mix of needs. This is because these communities do not always live harmoniously together and also their needs are different e.g. Travelling Showpeople would require larger sites to accommodate equipment.
- 3.91 Some Officers responding from East Herts Council stated that it would be unlikely that the Council would want to manage any new site, if need is identified, but if a public site or transit is required then other organisations such as Hertfordshire County Council or a Registered Provider may be approached.
- 3.92 The majority of Officers responding from the Council did not give a view as to a preferred size for a site; one officer stated a maximum of 6 pitches and another in line with government guidance of 15 pitches.
- 3.93 The majority of Members did not have a view on the management or ownership of sites; one Member believes sites should be privately managed with an input by the local authority.
- 3.94 The majority of Officers responding from neighbouring areas did not express a view with regard to the ownership and management of sites.

- ^{3.95} One Officer from a neighbouring authority confirmed that their GTAA had evidenced that Gypsies, Travellers or Travelling Showpeople would prefer to own sites, rather than use public sites and another officer confirmed that their view is that privately owned sites are more likely to be well maintained.
- ^{3.96} One Officer raised the issue of continuing to ensure that there is provision to meet the needs of those Gypsies, Travellers or Travelling Showpeople who cannot afford to purchase their own sites. The issue of who should manage additional public provision, should Hertfordshire CC not wish to increase the number of sites they are currently managing, may mean that future delivery options will need to be explored across the County such as working with RPs.

Community Cohesion, Employment, Health and Education Issues

- ^{3.97} No specific issues in relation to Travelling Showpeople when speaking about community cohesion were recorded.
- ^{3.98} Officers from East Herts Council highlighted when there is an encampment, an unauthorised development or a new site is being submitted for planning, especially if any of these are in the green belt, the public is immediately concerned and issues arise with Gypsies or Travellers and local settled residents. However, when sites are established few issues arise between the settled community and residents unless there is anti-social behaviour such as fly tipping.
- ^{3.99} Officers and Members from the Council highlighted there are sometimes internal family feuds and also specific groups of Gypsies and Travellers, such as Irish Travellers and English Gypsies, are unable to live on the same site due to cultural differences. This leads to sites needing to become specific to either one or the other.
- ^{3.100} Members reported little evidence to suggest there are tensions between Gypsies, Travellers and Travelling Showpeople communities or between these communities and the settled community within the area. One Member highlighted the issue of a public site in Welwyn Hatfield, albeit outside of East Herts area, which is believed to be a no-go area, even for the Police; the reputation of the site the Member stated tars all Gypsies and Travellers with the same brush.
- ^{3.101} Officers from neighbouring authorities generally reported few issues in relation to community cohesion other than the mistrust of the settled community towards Gypsies and Travellers in particular especially when issues around planning applications, site identification consultation or encampments occur.
- ^{3.102} One Officer from a neighbouring authority highlighted the use of terminology as there have been instances where a misunderstanding around the use of the term 'settled community', used in National Planning Policy to mean the general population, has been misinterpreted to mean the 'settled Gypsy and Traveller population'; this has been problematic when looking at possible locations for new sites.
- ^{3.103} Officers responding from East Herts Council believe Gypsies, Travellers and Travelling Showpeople are able to access education services, but are unaware as to what the situation is regarding their ability to access health. The majority of Officers further believe that it is unlikely that Gypsies, Travellers and Travelling Showpeople will want or need to access employment services as they are likely to be self-employed.

- 3.104 A minority of Officers responding from East Herts Council suggested that there would be a need to ensure that accessibility to health and education services and employment opportunities are taken into account when deciding where new sites should be located, if a need is evidenced.
- 3.105 The majority of Members do not have a view with regard to Education, Health or Employment in relation to the Gypsy, Traveller or Travelling Showpeople communities. It was generally agreed that Gypsies, Travellers or Travelling Showpeople are able to access these services if they wish to.
- 3.106 A minority of Members believe that accessing education may be difficult for these communities, but no more than for the settled community due to the lack of places, especially in the Sawbridgeworth area.
- 3.107 Officers responding from neighbouring authorities generally believe that Gypsies, Travellers or Travelling Showpeople are able to access health and education services. However, it is a perception that employment opportunities would not be accessed by these communities as they likely to be self-employed.
- 3.108 Officers responding from neighbouring authorities highlighted the location of new sites would ensure residents would have access to all necessary services.

Cross Boundary and Consultation Activities

- 3.109 Officers and Members of East Herts Council and Officers responding from neighbouring areas believe that the main travelling routes for Gypsies, Travellers or Travelling Showpeople through Hertfordshire are: the A10, A414, A1, A120, A602, A507, M25, A505 and M11.
- 3.110 Officers and Members of East Herts Council stated there is no trend for Gypsies, Travellers or Travelling Showpeople to move to neighbouring districts from East Herts neither does it appear these communities are being moved backwards and forwards between local authority areas; the low level of roadside encampments are believed to be Gypsies or Travellers passing through the area.
- 3.111 The majority of Officers responding from neighbouring areas do not believe that Gypsies, Travellers or Travelling Showpeople are moving out of their area to neighbouring districts. One Officer highlighted limited evidence of Gypsies or Travellers moving between districts. One Officer reported that in their GTAA, the survey had evidenced that all future newly forming households living on a site in their area would prefer to live in East Herts, but the Council has included this need in the own future provision figures because the numbers are few and the general geographic area used.
- 3.112 The majority of Officers and Members from East Herts Council are not aware of any cross-border working other than the last GTAA and some site scoping work which followed. Some Officers mentioned that discussions take place between local authority enforcement Officers in terms of sharing intelligence of where and when encampments take place and where such encampments may move to. One Member suggested there is a County group where senior Officers meet to discuss issues that may and do affect Gypsies, Travellers and Travelling Showpeople in the Hertfordshire area.
- 3.113 Officers responding from neighbouring local authority areas gave some examples of cross-border working such as undertaking GTAAs with neighbouring authorities such as Epping Forest DC who are part of an Essex wide GTAA currently being undertaken.

- 3.114 Some Officers reported that working with other local authorities is sometimes difficult, not because there is a lack of interest in doing so, but that it is politically a very difficult and controversial issue and sometimes the cooperation is next to nothing or a tick box exercise.
- 3.115 The majority of Officers and all Members responding from East Herts Council believe the Council is meeting its Duty to Co-operate.
- 3.116 Officers responding from nearby local authority areas believe they are complying with the Duty to Cooperate and specifically at Officer level; government guidance has also assisted the process. However, some Officers again pointed out that there is no political agreement on how any needs identified will be accommodated between the districts for example if a need for transit provision is evidenced across Hertfordshire.
- 3.117 A minority of Officers responding from neighbouring authorities believe they are complying with the Duty to Cooperate on the majority of issues, but are unsure as to whether this has included Gypsies, Travellers or Travelling Showpeople.
- 3.118 Officers and Members of East Herts Council stated that regular consultation with Gypsies, Travellers or Travelling Showpeople does not happen other than when Officers visit sites to undertake the bi-annual caravan count or to discuss specific issues face to face such as for the consultation undertaken for this study.
- 3.119 Officers responding from neighbouring local authority areas generally agree that consultation is undertaken on specific issues such as site refurbishments, the gaining of grant funding or in relation to planning policy and GTAAs for example.
- 3.120 The majority of interviewees agreed that site visits are undertaken when undertaking any form of consultation as written formats are less likely to be effective, sometimes due to low levels of literacy.
- 3.121 Officers responding from neighbouring local authorities where sites are managed by Hertfordshire CC, confirmed Officers from the County Council will help with consultation. In addition to this, other organisations such as Hertfordshire Gypsy and Traveller Empowerment (GATE) have also helped in ensuring residents on sites are involved in any consultation, and this has been especially useful when undertaking GTAAs.

Future Priorities and Any Additional Issues

- 3.122 It is generally agreed by all those interviewed that massive change is unlikely in relation to the numbers of Gypsies, Travellers or Travelling Showpeople living or travelling through the East Herts area.
- 3.123 Officers and Members responding from East Herts Council believe that a priority for the Council will be to ensure there are enough sites in decent locations to meet any mix and need identified for Gypsies, Travellers and Travelling Showpeople and that these priorities are based on informed decisions and not assumptions of what people may want.
- 3.124 A minority of Officers and Members from East Herts Council suggested that, if need is identified, a priority will be finding suitable locations based on a sound site criteria. Some Officers also believe that there is a need to find a balance between locating sites in rural areas and housing developments located in more urban areas and ensuring that these proceed forward to planning application stage.

- 3.125 A minority of Officers believe that further consideration needs to be made around transit provision as it may be those who may want to make their home in the area are penalised because of not having a place to stay temporarily whilst looking for a permanent pitch. It was emphasised that there is also no place to direct incursions to should there be a need to move Gypsies, Travellers or Travelling Showpeople.
- 3.126 Some Officers from East Herts Council believe that the needs of Travelling Showpeople should be a priority because additional need was identified in the last GTAA and has still not been met. It was put forward that further work should be undertaken with neighbouring authorities such as Broxbourne especially as there may be an indication that Travelling Showpeople will be more likely to be based in a yard for longer periods of time and travel less around the regions.
- 3.127 One Officer highlighted that more education and training is needed within the Council and the District in order for people to understand different cultures with the aim of improving community cohesion; it is suggested that this could assist the Council when it comes to consulting on future site locations should need be identified.
- 3.128 A minority of Members suggested that planning laws needed to be a little more flexible when there is a genuine need because of the number of applications being submitted by those who are not Gypsies, Travellers or Travelling Showpeople but want to live in a rural area where land values may be lower.
- 3.129 One Member suggested that having a monthly newsletter/e-zine highlighting key areas of work and progress for the Council's work, would be helpful to ensure that all Members were up-to-date.
- 3.130 The majority of Officers responding from neighbouring local authority areas agree their priority is either to identify the need in their area, or to identify sites to meet any need identified.
- 3.131 Some Officers from neighbouring authorities confirmed they will be looking to make more efficient use of existing sites to meet need rather than provide new sites.
- 3.132 Another priority for some Officers responding from neighbouring local authority areas is to explore ways to finance public sites such as involving registered providers who may be able to subsidise site provision.
- 3.133 Some Officers from neighbouring authorities wished to explore with other authorities the need to make provision for transit provision, perhaps within permanent sites, to allow for visitors to the area to stay for short periods of time on authorised sites.

Wider Stakeholders

Background

- 3.134 The majority of Stakeholders interviewed are not local authorities and therefore do not undertake their own GTAA's. Consequently, they are unaware as to the status of these documents in their area.
- 3.135 One Stakeholder responded that the additional need for Travelling Showpeople has to date been unmet and East Herts have not created any new sites or expanded any sites for members of this community. The Stakeholder highlighted the constraints of the current site being land locked.

3.136 The majority of respondents have not undertaken any specific training in relation to Gypsies, Travellers and Travelling Showpeople.

Accommodation Provision: Current Site Provision and Bricks and Mortar

3.137 The majority of respondents believe the current private Gypsy or Traveller authorised sites in East Herts meet the needs of the residents living on the sites.

3.138 Two respondents highlighted the Travelling Showpeople site at Rye House. The site is approximately 60-65 years old and privately owned by one family who rents out plots to other Travelling Showpeople. The site is now too small and is overcrowded and an additional site large enough to meet both accommodation needs and storage space for equipment is urgently needed.

3.139 Two respondents highlighted overcrowding on the South Mimms site, although not in East Herts, because some families are doubling up on pitches and there is a concern that the site is used as a permanent rather than transit site because residents appear to stay on the site for up to a year.

3.140 The majority of Stakeholders did not comment on whether unauthorised developments or sites with temporary planning permission meet the needs of residents; some Stakeholders stated there are none of these types of sites in East Herts.

3.141 One Stakeholder stated they believe temporary and unauthorised developments do meet the needs of residents.

3.142 Two Stakeholders confirmed that Travelling Showpeople would not be resident on sites with temporary planning permission or undertake unauthorised development because of the size of site that would be required.

3.143 A minority of respondents stated they are aware of some Gypsies, Travellers or Travelling Showpeople living in bricks and mortar accommodation and some were second generation. Two letters from ORS were made available to Stakeholders so they could pass it on to anyone they knew. However, no specific households in bricks and mortar were identified by Stakeholders to enable them to pass on the letter and no Gypsies, Travellers or Travelling Showpeople have contacted ORS in order to be involved in the consultation.

3.144 Some respondents confirmed that it would be unlikely that Travelling Showpeople will live in bricks and mortar accommodation because of the amount of equipment that is needed to be stored. Travelling Showpeople may retire and choose to live in bricks and mortar housing but it is more likely they live with family/relatives on a yard used as the main base. As far as is evidenced there are not known to be any Travelling Showpeople living in bricks and mortar accommodation in East Herts.

3.145 RPs confirm they do monitor the 7 strands of diversity but it is understood that the current housing application form used by East Herts Council does not enable applicants to state whether they are a Gypsy or Irish Traveller for example should they wish. Should this be correct this means that the RPs interviewed are unable to provide any information as to whether or not Gypsies, Travellers or Travelling Showpeople are being accommodated in bricks and mortar accommodation.

3.146 RPs did not provide any meaningful information as to where any Gypsies, Travellers or Travelling Showpeople they house have moved from, the type of tenure they had been living in or the reason for

needing to be housed. Because East Herts Council manage the housing register some RPs believe the Council are more likely to be aware of this information.

- 3.147 Should the housing application process include opportunities for Gypsies, Travellers or Travelling Showpeople to self-identify, RPs could then monitor this information. However it will still be reliant on whether or not those completing the necessary application form or who are asked to update their profiles choose to declare this information.
- 3.148 One RP confirmed that their organisation had recently created a Research and Insight Team to look at how the organisation can use Customer Profile information more effectively in order to tailor their services to meet individual needs.
- 3.149 It was generally agreed that Gypsies, Travellers or Travelling Showpeople living in bricks and mortar housing may be reluctant or unwilling to be interviewed as part of the consultation. It is believed this is because they are suspicious of those in authority and also as to what the information will be used for. However, some stakeholders believe that the problem is not, why Gypsies, Travellers or Travelling Showpeople would refuse or not want to be interviewed; the problem is identifying these households in the first place.
- 3.150 Some Stakeholders believe that bricks and mortar accommodation does not meet the needs of Gypsies, Travellers and Travelling Showpeople because it is against their culture. One stakeholder commented that Gypsies, Travellers and Travelling Showpeople do not choose to move into bricks and mortar housing, it is usually through necessity, and it is unlikely to meet their long term requirements or aspirations.
- 3.151 One Stakeholder reported that Travelling Showpeople would not be averse to living in bricks and mortar accommodation providing the curtilage is big enough to accommodate any equipment etc.
- 3.152 The majority of RPs did not raise any major issues in relation to housing management when housing Gypsies, Travellers or Travelling Showpeople. RPs highlighted that there are occasional Anti-Social Behaviour Issues especially in relation to younger Gypsies or Travellers, untidy gardens and lack of household rubbish disposal, but there is no evidence to suggest this is more than those in the settled community being housed by RPs.
- 3.153 One stakeholder also suggested that there is sometimes discrimination in relation to Gypsies, Travellers and Travelling Showpeople when housed in bricks and mortar housing from those who are from the settled community.

Accommodation and Management: Roadside Encampments/Transit

- 3.154 Stakeholders agree that roadside encampments are not regular occurrences in the East Herts area. One Stakeholder highlighted Puckeridge as an area where encampments used to arise but that was before the Criminal Justice and Public Order Act 1994 (Section 61).
- 3.155 Some Respondents believe that when encampments occur in the area it is more likely to be Gypsies or Travellers rather than Travelling Showpeople. When encampments occur they are believed to be because of specific events such as a wedding, visiting family or they are travelling through for work.

Gypsies and Travellers - Trends, Favoured Locations and Stopping Points

- ^{3.156} Respondents did not report any significant trends in East Herts as it is, some reported, quieter in terms of the number of Gypsies, Travellers and Travelling Showpeople than other districts in Hertfordshire.
- ^{3.157} Some Stakeholders believe that in general across Hertfordshire there has been an increase in the number of permissions being granted for privately owned sites.
- ^{3.158} One Stakeholder highlighted that although not specifically relevant to East Herts; the financial climate for Travelling Showpeople has resulted in the general public not being able to afford to go to the circus or fairgrounds etc. The following trends have also been identified with regard to Travelling Showpeople:
- » Reduced travelling due to cost of diesel;
 - » Yards being used all year round and not just for winter quarters;
 - » Business being kept to a smaller geographic area;
 - » Change from traditional showground or fairground events from Spring to early Autumn to specific occasions such as Bonfire Night and Christmas events such as at garden centres;
 - » A change in the general public's use of leisure time and money.
- ^{3.159} Respondents do not believe there were any particular locations or stopping points that are favoured by Gypsies, Travellers or Travelling Showpeople in the East Herts area.
- ^{3.160} One stakeholder highlighted the fact that Hertfordshire more generally has good access roads e.g. the M25 to London and another stakeholder responded that Gypsies, Travellers or Travelling Showpeople are likely to be in areas where their families are located and because there has always been these communities in Hertfordshire and that is why they are here.

Future Accommodation Needs: Permanent and Transit provision

- ^{3.161} Stakeholders have mixed views as to whether there is sufficient site provision in the East Herts area. The majority believe that additional sites should be provided. Some respondents believe there should be a mix of publicly and privately owned sites and that as East Herts already has a number of private sites, then a public site should be a priority. An additional Travelling Showpeople site is known to be needed.
- ^{3.162} A minority of Stakeholders believe there is a need for another transit site in Hertfordshire, but whether or not this should be located in East Herts has not been evidenced.
- ^{3.163} One respondent highlighted the number of private sites across Hertfordshire and raised concerns that those who could afford it were having their needs met and this was counting towards councils' unmet need sometimes as windfall sites, whilst those Gypsies, Travellers or Travelling Showpeople unable to afford to provide for themselves are not having their needs met. The respondent is particularly concerned for those who are sometimes vulnerable such Gypsies, Travellers or Travelling Showpeople whom are older and/or who are in poor health.

^{3.164} Respondents stated the following as important criteria to consider with regard to site location and design:

- » Access to amenities and facilities such as GPs, schools, shops, public transport etc.;
- » Access to facilities on site such as water, electric, drainage and rubbish disposal;
- » Sufficient access and space for emergency vehicles;
- » That sites meet specific legal legislation such as the Regulatory Reform (Fire Safety) Order 2005 and the Caravan Sites and Control of Development Act 1960;
- » In close proximity to other residential areas and not located in rural areas where residents could be isolated;
- » Sites should be located away from local residents because of any noise disturbance, but close enough to facilities because of the cost of fuel and travelling time.

^{3.165} The majority of Stakeholders were unable to suggest locations for new sites. One respondent highlighted Puckeridge, Bishop Stortford and Ware.

^{3.166} The majority of Stakeholders do not have a view as to who manages any new sites. One Stakeholder highlighted that Travelling Showpeople sites should be managed independently and not be managed by a specific organisation. Where sites are managed by a specific organisation a resident has to pay to be a member and abide by its rules before becoming a tenant of a pitch, those who are not members of the organisation running the site are not allowed on these sites³.

^{3.167} The majority of stakeholders did not put forward a preferred size for a site other than one who stated that no more than 15 pitches, as outlined in government guidance would be considered manageable. In terms of Travelling Showpeople it was suggested that 6-8 plots would be ideal with each plot being approximately ½ acre.

Community Cohesion, Employment, Health and Education Issues

^{3.168} Stakeholders in general agreed there are issues around community cohesion. These challenges were not only between the settled community and Gypsies and Travellers but also between Gypsies and Travellers themselves. Some respondents put forward that when new sites are being developed they will need to be for specific groups of Gypsies or Travellers as mixed sites would be a challenge to manage.

^{3.169} One Stakeholder noted that as a general comment there appeared to be some negative feelings from communities towards Gypsies and Travellers but this is sometimes as a result of a negative standpoint held by Gypsies or Travellers before becoming members of a wider community.

^{3.170} Some stakeholders believe that further work with regard to education, needs to be undertaken with the Gypsy, Traveller and Travelling Showpeople communities and the settled community in order that there is better understanding of the different cultures.

³ This response was made by the Association of Independent Showmen in relation to the Showmen's Guild.

- 3.171 The majority of Stakeholders stated they believe Gypsies, Travellers and Travelling Showpeople living on authorised sites and in bricks and mortar accommodation are able to access services relating to health and education. One stakeholder did mention that sometimes members of the Gypsy, Traveller or Travelling Showpeople communities are sometimes reluctant and/or sceptical of engaging with services they have little contact with or where there are cultural taboos such as mental health.
- 3.172 The majority of stakeholders are unable to respond as to whether Gypsies, Travellers or Travelling Showpeople access employment opportunities. The majority of Stakeholders believe that Gypsies, Travellers or Travelling Showpeople are self-employed.
- 3.173 One Stakeholder highlighted that because traditional work such as scrap metal dealing is now difficult to earn a living from, more Gypsies or Travellers have been seeking full time jobs and are likely not to speak of it due to it being culturally unusual.

Cross Boundary and Consultation Activities

- 3.174 Stakeholders recorded that the following routes may be used by Gypsies, Travellers or Travelling Showpeople: M1, M25 and A10. One Respondent highlighted that Travelling Showpeople would be less likely to travel the same routes through the County but will criss-cross the country dependent on what shows are wanted.
- 3.175 The majority of Stakeholders do not believe that Gypsies, Travellers or Travelling Showpeople are moving from East Herts to other areas or vice versa, nor are they being forced to move between local authorities areas because of eviction. Travelling Showpeople travel to work to a known location, not to find a place to live or to find opportunities for work.
- 3.176 One Respondent remarked that the Travelling Showpeople at Rye House are happy to work with East Herts and nearby local authorities such as Broxbourne to find an additional site – they are not or do not wish to be constrained by local authority boundaries.
- 3.177 Stakeholders generally believe that Gypsies, Travellers or Travelling Showpeople are either based in East Herts or are Gypsies or Travellers passing through the area and stopping for a few days to break up the journey.
- 3.178 Stakeholders generally believe that cross boundary working could be improved but examples were suggested, such as the Hertfordshire Gypsy and Traveller Section Multi Agency Group and also work undertaken by Gypsy and Traveller Empowerment (GATE).
- 3.179 The majority of Stakeholders did not provide a view as to whether East Herts Council is complying with the duty to cooperate with regards to Gypsies, Travellers and Travelling Showpeople. One Stakeholder stated that all districts already cooperate as Gypsy Liaison Officers meet up from all over the country on a regular basis.
- 3.180 The majority of Stakeholders are not aware of any current consultation other than the work being undertaken for the GTAA. In some cases respondents gave examples of engagement rather than consultation.
- 3.181 One Stakeholder highlighted the work that involved Travelling Showpeople with the East of England Plan and complimented East Herts on that work. It was suggested that this liaison should be re-

established because of the positive engagement and experience that had been with the aim of resolving the unmet needs of the Travelling Showpeople community in its district.

^{3.182} Regular engagement with Gypsies, Travellers or Travelling Showpeople is undertaken with residents on authorised public sites in Hertfordshire managed by the County Council, together with support agencies for Gypsies, Travellers and Travelling Showpeople, examples were given as ensuring improved safety. One stakeholder highlighted that engagement with those living on private sites was often a challenge.

^{3.183} Where engagement is undertaken and where consultation is occasionally carried out with regard to a specific reason such as the GTAA this is done via face to face contact. Issues relating to literacy were highlighted for Gypsies and Travellers in particular, and the belief is that face to face contact is the best way to communication with these communities as, in the most part, it builds up trust.

^{3.184} One stakeholder believes that through general engagement and encouraging Gypsies, Travellers or Travelling Showpeople who had moved into bricks and mortar accommodation to become involved in the wider community trust has improved, but no suggestions as to why this has improved were given.

Future Priorities and Any Additional Issues

^{3.185} The majority of Stakeholders believe that further site provision should be provided as a priority in East Herts, but also across Hertfordshire and local authorities should work together to achieve this aim.

^{3.186} Some Respondents believe that the priority in East Herts is to meet the current unmet need for Travelling Showpeople as identified in the last GTAA and that working with the residents living on the Rye House site will achieve this.

^{3.187} In terms of the type of sites, the majority of Stakeholders suggested that public sites are needed in order to meet the needs of those that cannot afford to purchase their own land. Some stakeholders mooted the idea that another transit site within Hertfordshire should be considered.

^{3.188} One Stakeholder believes that small private sites managed by a specific family have proven to be successful and there tends to be far less social issues and less call on public funds than those provided through the public sector.

^{3.189} Some concern was highlighted over the low levels of literacy within the Gypsy and Traveller community in particular. With the emphasis on information/digital technology it may be that members from these communities may find it even harder to access services from councils and RPs for example.

^{3.190} One stakeholder raised a concern over whether anything would be achieved by undertaking another GTAA as there was a lot of expectation when the last one was completed and nothing seems to have materialised to meet the needs identified.

^{3.191} One Stakeholder suggested that liaison between the Council and RPs could be improved in terms of whether or not a prospective tenants are from the Gypsy, Traveller or Travelling Showpeople communities. This could help RPs to tailor their services that could help sustain a tenancy.

^{3.192} It is believed that communication networks need to be improved with members of the Gypsy, Traveller and Travelling Showpeople communities in order to ensure that improvements can be made to sites, such as safe access for emergency services and consultation activities generally.

Parish Survey

^{3.193} Nine Parish Councils completed and returned the Parish survey. Of the nine, none reported having any Traveller sites, Showpeople yards or regular unauthorised encampments in their Parish.

Suggestions

- » Monthly update for members on key issues
- » Training for members and the wider community on Gypsies and Travellers and Travelling Showpeople and other cultures and ethnicities.
- » Liaison between the Travelling Showpeople at Rye House and East Herts Council should be re-established.
- » Improvements made to housing applications in terms of ethnicity data

4. Gypsy and Traveller Population

Introduction

- 4.1 One of the components of this assessment was a detailed survey of the Gypsy and Traveller population in East Herts. This aimed to identify current households with housing needs, and to assess likely future household formation from within the existing households to help judge the need for future site provision. The survey sought to provide a baseline position on the resident Gypsy and Traveller population of East Herts. As noted in the introduction, “Gypsy and Traveller” refers to;

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 dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such (Planning Policy for Traveller Sites, CLG, March 2012).

- 4.2 Interviews were attempted with every Gypsy and Traveller household in the area who were present during the fieldwork period in January 2014. Therefore, the baseline point for the findings of this study is January 2014.
- 4.3 In total, interviews were achieved on-site with 5 households, all of which were from private sites (2 at Nine Acres and 3 at Field Farm). For a further private site at The Stables the owner provided details on all 6 households who were living at the site. ORS researchers also visited the Esbies site which was the subject of a large scale recent planning inquiry. At the time of the visit most of the site was either empty or sub-let to non Travellers, but we did determine that there were 5 Gypsy and Traveller households living on the site. They did not wish to be interviewed, but we have counted them as households on unauthorised sites. An additional interview was also carried out over the phone with a traveller living in the area. No interviews were carried out with any households living in bricks and mortar. Due to the small size of the Gypsy and Traveller population we have not provided any data relating to this group in this report, but we do provide data for Travelling Showpeople.

Survey of the Gypsy and Traveller Population

Connections with the Area and Length of Residence

- 4.4 Respondents said that they had always lived in the area/had lived there a long time/grew up in the area. They also said that their friends and family are from the area, that family members work in the area and their children go to school there.
- 4.5 4 out of the 5 respondents said they had lived on the site they are currently living on for 5 years or more.

Satisfaction with Living at Current Address

- 4.6 All 5 respondents reported being satisfied with living at their respective sites. When asked why they liked living there, their responses were: because they are settled, because they've lived there all their life and because it's nice and quiet.

Housing Needs

- 4.7 3 out of the 5 respondents interviewed reported that their current accommodation and site meets all of their needs in terms of accommodation quality and space; and site facilities, location and management. When respondents who felt that their current accommodation was not meeting their needs were asked the reason for this, one of them said that it was because it was too small while the other respondent said that the road surfaces needed improving. They both felt that these needs could be addressed at their current pitch.
- 4.8 2 respondents said that their brother/sister (inc. half-, step & -in-law) would need to live at the site but are not able to at present. These relations were said to be currently living in Bricks and Mortar.
- 4.9 When asked about what improvements could be made to the site, respondents said that improved road surfacing and site safety, emptying of bins and the addition of traffic calming near the entrance could all improve the site.

Local services

- 4.10 Respondents were asked about their use of local services and all of them reported using local shopping facilities and the local GP. Most respondents also reported using local pharmacies, hospitals, dentists, schools, sport and leisure facilities and parks and green spaces.

Travelling

- 4.11 Only 3 out of the 5 respondents said that they have made trips (living in a caravan or trailer) away from their current site/permanent base in the last 12 months. 2 of these respondents made trips away for less than one month in total while the other respondent spent between 1 and 3 months away from their site in total. One respondent stayed at an authorised private site while the other 2 stayed at unauthorised encampments. One respondent said that they usually travel in the spring or summer for fairs while another said that they usually travel for a holiday.
- 4.12 The two respondents that hadn't travelled in the past 12 months said that they had travelled previously. One respondent said that the reason for not travelling in the past 12 months was due to the old age of family members while another said that it was because they want a more settled lifestyle.

Bricks and Mortar

- 4.13 When asked about bricks and mortar one respondent reported owning or renting a house, bungalow or flat. Another respondent said that they had lived in bricks and mortar accommodation 10 years ago or more but that it didn't suit them.
- 4.14 None of the respondents interviewed felt that they needed to move to a new permanent base, either now or in the next 15 years.

Additional interview with a Traveller

- ^{4.15} In addition to the 5 interviews undertaken on sites, a telephone interview was also carried out with a 72 year old traveller who has bought a piece of land with stables and a shipping container. It has electricity and water and isn't far from the town. He tried to get planning permission to re-build the stables but it was declined on more than one occasion. Therefore the gentleman lives in a motorhome on the side of the road.
- ^{4.16} He reported that there have been 3 planning applications, 3 appeals and he receives repeat visits from enforcement officers. He feels that the council should be identifying places where travellers can buy an odd bit of land or providing many more publicly and privately rented sites.
- ^{4.17} Finally, he added although he is extremely fit and healthy for his age, the lifestyle that he is living and has lived all his life has got to change in some way, but he can't imagine living in a house.

5. Travelling Showpeople

Introduction

- ^{5.1} This section focuses on the needs and aspirations of Showpeople in East Herts. As noted in the introduction, Travelling Showpeople are not a recognised ethnic group under the Equalities Act 2010, but within Planning Policy for Traveller Sites 2012 they are defined 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 family's or dependent's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller Sites, CLG, March 2012).

- ^{5.2} Throughout this study the person responding to the survey will be referred to as the respondent, and in questions which refer to all people in the household they will be referred to as household members. Throughout the remainder of this report the majority of numbers which appear on the charts represent the percentage of respondents who appear in that category. The purpose of showing percentages is to allow the results of the survey to be extrapolated to the whole Gypsy and Traveller population of East Herts. In a few cases, it is more appropriate to use the actual number of respondents, and these cases are clearly identified. In all charts those respondents who answered 'don't know', or did not answer the question, are omitted unless otherwise stated.

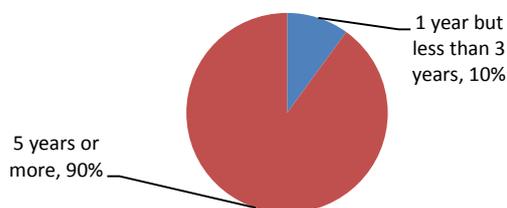
Survey of the Travelling Showpeople Population

5.3 During the course of the household survey interviews were attempted with 100 Showpeople households in the area. Interviews were achieved with 20 Travelling Showpeople. All 20 interviews were carried out with Travelling Showpeople at a yard in Rye House.

Length of Residence

5.4 The vast majority of Travelling Showpeople interviewed had been living at their current yard for 5 years or more (90%; 18 respondents) (Figure 2).

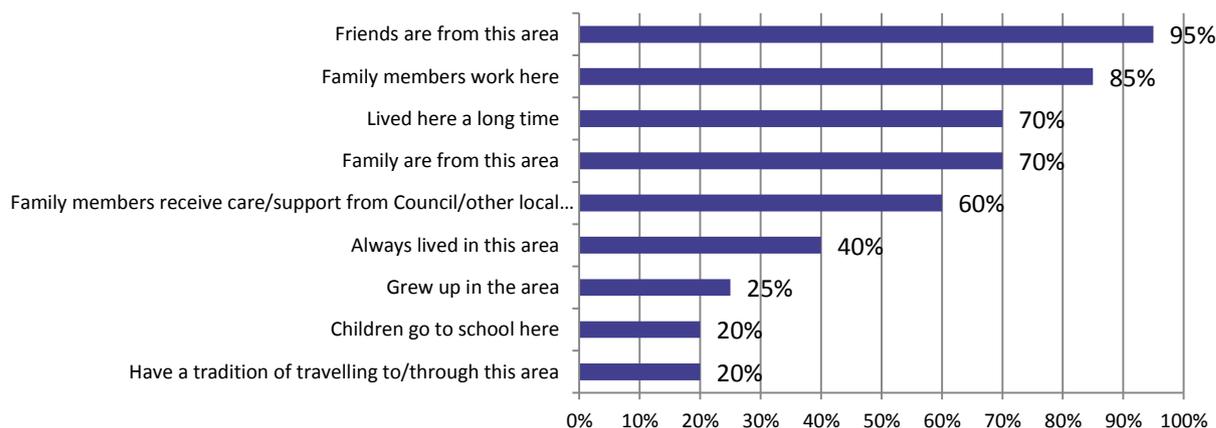
Figure 2
Length of Time Respondents and their family have lived at current address, by all Respondents
 (Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



Connections with the Area

5.5 Respondents noted a variety of different connections to their local area (see Figure 3 below), with the main links identified being that their friends are from this area (95%; 19 respondents), that family members work here (85%; 17 respondents), that they've lived here a long time (70%; 14 respondents) and that their family are from this area (70%; 14 respondents).

Figure 3
Nature of Local Connections in East Herts, by all Respondents (Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



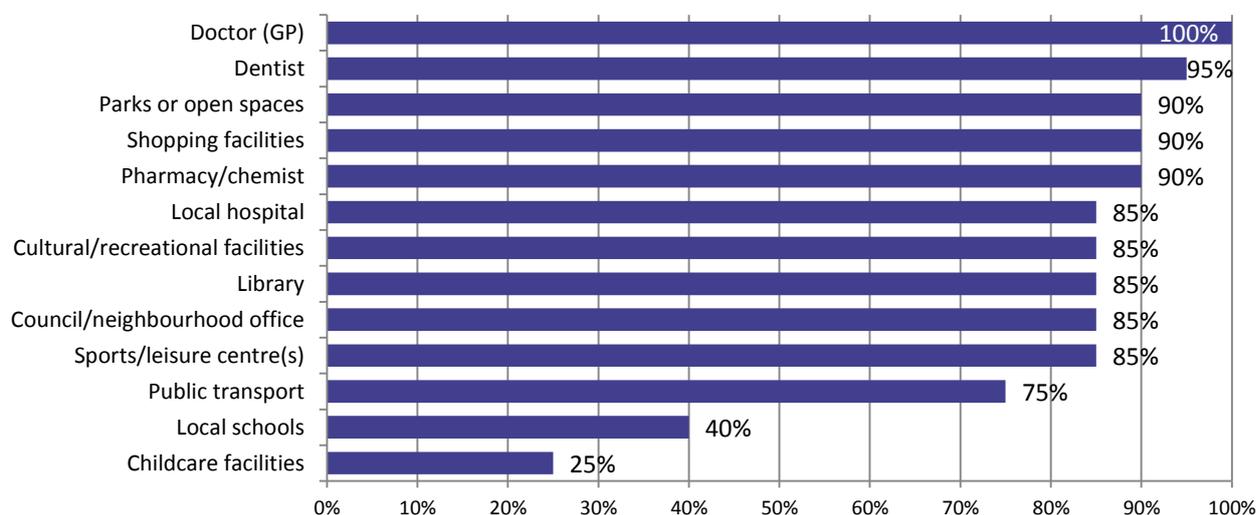
Housing Needs

^{5.6} All 20 respondents felt that their needs in terms of accommodation quality and space were met at their current yard and all felt that no improvements were required.

Local services

^{5.7} When asked what local services they use, respondents reported using a wide range of local services (see Figure 4 below). The services that respondents reported using most were: A doctor (GP) (100%; 20 respondents), a dentist (95%; 19 respondents), parks or open spaces (90%; 18 respondents), shopping facilities (90%; 18 respondents) and a pharmacy/chemist (90%; 18 respondents). The least used local services were local schools (40%; 8 respondents) and childcare facilities (25%; 5 respondents).

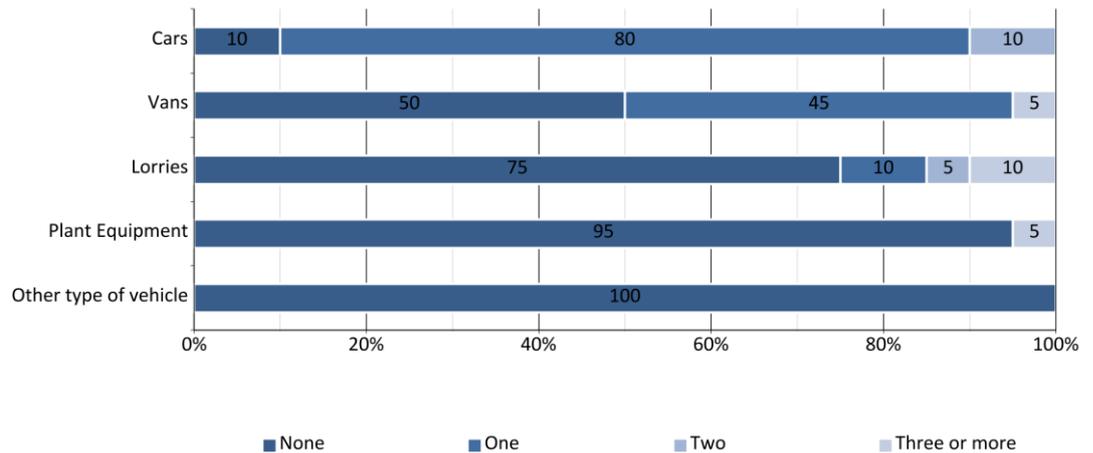
Figure 4
Local Services used in East Herts, by all Respondents (Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



Vehicles

^{5.8} When respondents were asked how many vehicles they had on their yards, and the vast majority reported having one or two cars on their yards (90%; 18 respondents). Half of respondents (50%; 10 respondents) also reported having at least one van on their yard.

Figure 5
How many vehicles respondents have on their yards in East Herts, by all Respondents (Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



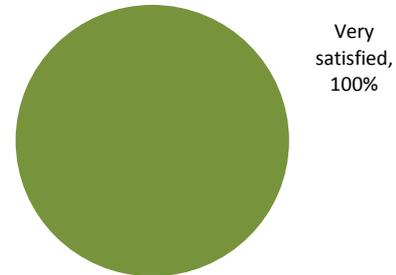
Bricks and mortar

^{5.9} Although none of the respondents currently owned or rented a house, flat or bungalow, 3 respondents said that they had previously lived in this type of accommodation. 2 of the 3 respondents had lived in bricks and mortar over 10 years ago. The other respondent who had previously lived in bricks and mortar reported this to be more than 1 year but less than 3 years ago.

Satisfaction with Living at Current Address

5.10 All respondents (20 respondents) said that they are very satisfied with living at their current address.

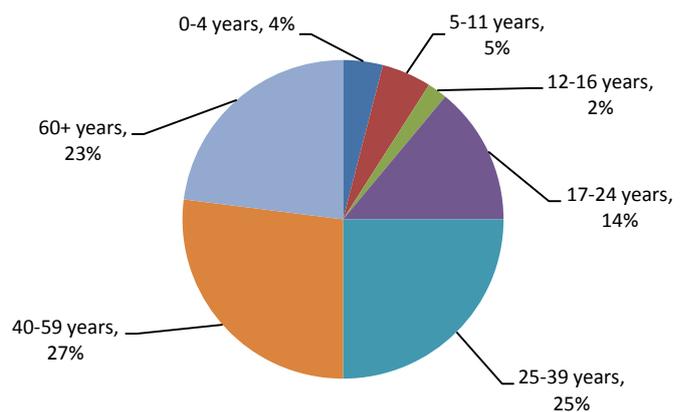
Figure 6
Satisfaction with living at current address, by all Respondents
(Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



Age and Household Profile

5.11 Households surveyed displayed a fairly even age profile, with 14 household members aged 24 or under (25%), 14 household members aged 25 to 39 (25%), 15 household members aged between 40 to 59 (27%) and 13 household members aged 60 and above (23%).

Figure 7
Age Group, by all Respondents
(Source: Survey of Gypsy and Traveller Population Travelling Showpeople 2014)



Health Problems

5.12 5 respondents interviewed identified that their household contains at least one member with a long-term health problem. Of these respondents, none reported requiring an adaption in their home to meet the care needs of those with health issues.

6. Future Pitch Provision for Gypsies and Travellers

Pitch Provision for Gypsies and Travellers

- 6.1 This section focuses on the extra site provision which is required in East Hertfordshire currently and over the next 18 years by 5 year segments. This time period allows for robust forecasts of the requirements for extra provision based upon the evidence contained within this survey and also secondary data sources.
- 6.2 This section concentrates not only upon the total extra provision which is required in the area but whether there is a need for any transit sites and/or emergency stopping place provision.
- 6.3 Before commencing on the identification of future needs we would wish to note some key points. The East of England Regional Spatial Strategy identified required pitch provision for each Local Authority. However, with the Coalition Government announcing the planned abolition of all Regional Spatial Strategies and the advent of the Localism Act 2011, National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012 it should be the case that Local Plans rapidly replace the RSS as material consideration in planning decisions. It is also the case that we have not considered provision made in the period 2006-2013 and instead we are taking January 2014 as a baseline position for our estimates. However, it is worth noting that in 2006, East Hertfordshire had 7 authorised pitches for Gypsies and Travellers and they now have permission granted for 22, so they have provided permission for 15 additional pitches since 2006, representing over 200% increase.
- 6.4 While there is a case to argue that authorities who failed to meet their needs in the period 2006-2013 should be expected to meet these in the future, or those who did provide in the period 2006-2013 should not have to provide as much in the future, there is no clear mechanism in place for this to occur. Instead we have modelled on any current needs being a backlog which has derived over time and then allowed for additional future needs as they are likely to arise. In this case the backlog of need refers to households who need to have their own accommodation. This includes concealed households, those on unauthorised sites who do not wish to move and those in bricks and mortar seeking to move to sites.
- 6.5 The March 2012 CLG document 'Planning Policy for Traveller Sites' requires an assessment for future pitch requirements but does not provide a suggested methodology for undertaking this calculation. 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 for residential pitches is to compare the supply of pitches available for occupation with the current and future needs of the households. The key factors in each of these elements are set out below:

Supply of pitches

^{6.6} Pitches which are available for use can come from a variety of sources. These include:

- » Currently vacant pitches;
- » Any pitches currently programmed to be developed within the study period;
- » Pitches vacated by people moving to housing;
- » Pitches vacated by people moving out of the study area;

Current Need

^{6.7} There are three key components of current need. Total current need (which is not necessarily need for additional pitches) is simply:

- » Households on unauthorised developments for which planning permission is not expected;
- » Concealed households; and
- » Households in brick and mortar wishing to move to sites;

Future Need

^{6.8} There are three key components of future need. Total future need is simply the sum of the following:

- » Households living on sites with temporary planning permissions;
- » New household formation expected during the study period; and
- » Migration to sites from outside the study area.

^{6.9} We will firstly provide the model as set out above for Gypsies and Travellers within East Hertfordshire. We will then separately analyse the need for additional transit provision in the study area before repeating the calculation for Travelling Showpeople.

Current Gypsy and Traveller Site Provision

^{6.10} The planning records for East Hertfordshire indicate that there are 3 private sites in the area. In total these sites have permission for 22 pitches.

^{6.11} The next stage of the process is to assess how much space is, or will become available, on existing sites. The main ways of finding this is through:

- » Current empty pitches;
- » New sites or site extensions which have already been granted permission or are likely to gain planning permission in the foreseeable future or sites which are likely to come back into use following refurbishment;
- » Migration away from the area;

- » Movement to bricks and mortar;

6.12 The on-site survey indicates that there are 12 households currently living on these sites, with some of the planning permissions at the site at Nine Acres, High Cross yet to be implemented. This site has permission for 8 caravans, but is only occupied by 2 households with 3 caravans at the moment. We have taken the view that this is a family run site for family members only and therefore, any additional supply from this site will be to accommodate in-migration from elsewhere and future family formations. A similar position applies to both Field Farm and The Stables, neither of which were occupied to their full capacity, but we have assumed that additional space is for family members and not to meet wider needs.

6.13 When calculating out-migration to other areas or movements from sites to bricks and mortar, it must be borne in mind that households may also wish to move in the opposite direction. Therefore, we have treated these as being part of the current and future need sections of the calculation.

Additional Site Provision: Current Need

6.14 The next stage of the process is to assess how many households are currently seeking pitches in the area. Groups of people who are likely to be seeking pitches will include those:

- » Households on unauthorised developments for which planning permission is not expected;
- » Concealed households; and
- » Households in bricks and mortar wishing to move to sites;

Current Unauthorised Developments

6.15 There are currently two unauthorised sites in East Hertfordshire. The first is a motorhome occupied by a single male who is living on the roadside. He has had planning permission for a more permanent site rejected and at the moment his circumstances can only be counted as being an unauthorised site.

6.16 The second site is at Esbies and at the time of the survey, ORS identified 5 Gypsy and Traveller households at the site, none of whom wished to take part in the household survey. The remainder of the site was either empty or sub-let to non-Travellers. The original planning appeal on this site involved 21 enforcement notices. It was accepted by the planning inspector that many of the households had alternative accommodation. Therefore, we consider the 5 households living on the site to represent immediate need, but would note that the planning appeal did indicate many more households who wish to live on the site.

Concealed Households

6.17 The household survey also sought to identify concealed households who require a pitch immediately. A concealed household is one who is living within another household and would wish to form their own separate family unit, but are unable to do so because of a lack of space on public or private sites.

6.18 The on-site survey found one case of a site at The Stables where the original permission was for 5 permanent and one touring caravan which contained 6 households. However, East Hertfordshire have recently increased the number of pitches and caravans allowed on this site, so this issue has been addressed.

Bricks and Mortar

- ^{6.19} Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. The 2011 UK Census of Population identified a population of 25 Gypsy and Traveller households in East Hertfordshire, including those on sites. While this figure is almost certainly an under-estimate, it does indicate a relatively low population of Gypsies and Travellers in housing.
- ^{6.20} ORS worked with stakeholders, the Local Authority, on-site interviewees and also through advertising on the Friends, Family and Travellers Facebook page to identify households in bricks and mortar. This process yielded no interviews, but did identify 2 households during the on-site interviews where the existing households wished for another household to join them on-site from bricks and mortar. In one case the bricks and mortar household was linked to the Nine Acres site where there is space to develop new pitches. In the second case, the household is linked to The Stables, where the planning permission has recently been varied to allow more households. Therefore there is space on both of the family run sites for the households in bricks and mortar and we have not counted either as need because we have not counted the undeveloped pitches as supply.
- ^{6.21} East Hertfordshire District Council also received confirmation from Hertfordshire County Council that there are no East Hertfordshire bricks and mortar residents on their Gypsy and Traveller site waiting list.
- ^{6.22} We would also note that it would be possible for the Council to undertake an extremely expensive process to try and identify all households in bricks and mortar. However, the National Planning Policy Framework requires councils to use a proportionate evidence base and the new National Planning Policy Guidance, Section 3, para 1 recommends:
- Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc. and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base.*
- ^{6.23} Therefore, Gypsies and Travellers are the only group in the community who are currently being surveyed on a regular basis with all other housing needs being assessed from secondary data. We would consider it contrary to this policy for a large scale expensive survey to be undertaken to assess the needs of Gypsies and Travellers in bricks and mortar.
- ^{6.24} It is also the case that within most face to face surveys undertaken on-site by ORS, a small number of households are seeking to move to bricks and mortar. Therefore, it should be remembered that movement between housing and sites runs in both directions. However, the on-site survey contained no interviews with households wanting to move from sites to bricks and mortar.

Additional Site Provision: Future Need

^{6.25} The next stage of the process is to assess how many households are likely to be seeking pitches in the area in the future. Groups of people who are likely to be seeking pitches will include:

- » Households living on sites with temporary planning permissions;
- » New household formation expected during the study period; and
- » Migration to sites from outside the study area.

Temporary Planning Permissions

^{6.26} There are no pitches on sites with temporary planning permission in the study area.

New Household Formation

^{6.27} Many studies of Gypsy and Traveller populations assume a net growth in the population of around 3% per annum, and this figure was used in the East of England Regional plan. However, a 3% per annum growth rate will see household numbers double in 23.5 years and this figure has been widely used without any clear underlying evidence to support it.

^{6.28} In a study on behalf of the Office of the Deputy Prime Minister in 2003 (Local Authority Gypsy and Traveller Sites in England Office of the Deputy Prime Minister, 2003), Pat Niner identified that household growth rates of 2%-3% per cent a year were appropriate when projecting future formations.

^{6.29} In October 2007 the Department of Communities and Local Government issued guidance for conducting Gypsy and Traveller Accommodation Assessments. On page 25 this provides a worked example using a 3% per annum household formation rate, but notes in footnote 6 that:

- » 'The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count.'

^{6.30} Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates. This position was confirmed by the Planning - Economy and Society section of Department Communities and Local Government who at a Westminster 'Gypsy & Traveller Briefing 2013: Planning Policy Progress & Delivery' on October 15th 2013 to 32 local authority participants stated:

- » '3% is not policy.'

^{6.31} This position was further reiterated in the debate in the House of Commons on February 4th 2014 when the planning minister, Brandon Lewis MP stated:

- » *'That leads me directly to the comment of my hon. Friend the Member for South West Bedfordshire about the 3% growth rate in Gypsy and Traveller household net formation. He believes the figure to be closer to 1.5% and will know from his research that the 3% figure originates in the Office of the Deputy Prime Minister's 2003 report "Local Authority*

Gypsy/Traveller Sites in England”, which was probably written with the same pens that we still have many thousands of, paid for with taxpayers’ money back then. The figure was restated in the Department for Communities and Local Government’s 2007 report “Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies”. My hon. Friend makes a fair point, so, bearing in mind that we have moved away from regional spatial strategies, I will go away and examine whether we can reassess the guidance.’

- ^{6.32} ORS have produced a detailed separate paper ‘Household Formation Rates for Gypsies and Travellers: Technical Note’ which demonstrates that the likely rate of growth for the population of Gypsies and Travellers across the whole of England based upon the best available evidence is closer to 1.5% per annum. Officials from Communities and Local Government have seen the technical note and confirmed that they have not undertaken any research on population or household growth for Gypsies and Travellers, and therefore have no information which contradicts this position.
- ^{6.33} A population growth rate of 1.5% will not necessarily equate to a household growth rate of 1.5%. Instead household growth rates may be higher. For example, across the whole of England for the whole population, the Office for National Statistics, in their 2011 based population, highlight a natural change in the population of 0.5% per annum and an overall change of 0.83% per annum when the effects of migration are added. 2011 based household projections produced by Communities and Local Government show a projected rise in households on 0.95% per annum.
- ^{6.34} ORS believe that the 3% figure often used in Gypsy and Traveller Accommodation Assessments is demonstrably too high to be used as a fixed value for all studies and is not based upon any form of robust evidence. Instead we believe that a range of values should be considered in light of local evidence.
- ^{6.35} The household survey for East Hertfordshire found 15 children across the 11 pitches which were surveyed. The area also had two pitches with single persons over the age of 70. If we expand this to all 20 occupied pitches (12 authorised, 2 bricks and mortar, and 6 unauthorised) it is reasonable to conclude that the net level of formations will be around 12 for the next 18 years, allowing for half of all children to form in the area and for some dissolutions due to death. However, all 3 private sites have currently undeveloped space on them to allow for new household formation and therefore we have reduced this figure to 6 pitches to allow for this space.

In-migration from Other Sources

- ^{6.36} The most complicated area for a survey such as this is to estimate how many households will require accommodation from outside the area. Potentially Gypsies and Travellers could move to East Hertfordshire from anywhere in the country. The number of households seeking to move to the area is likely to be heavily dependent upon pitch provision elsewhere. It has been noted that a weakness of many Gypsy and Traveller Accommodation Assessments conducted across the country has been that they either allowed for out-migration without in-migration, which led to under-counting of need, or they over-counted need by assuming every household visiting the area required a pitch.
- ^{6.37} Overall, the level of in-migration to East Hertfordshire is very difficult to predict. No households in the household survey wished to leave the area. Therefore, there is little evidence that households are seeking to leave East Hertfordshire.

- 6.38 On this basis we have allowed for a balanced level of migration on to existing sites with space on existing sites being available for family members from elsewhere to migrate to the area. The advantage of allowing for net migration to sum to zero is that it avoids the problems seen with other Gypsy and Traveller Accommodation Assessments where the modelling of migration clearly identified too low or high a level of total pitch provision. An assumption of net nil migration implies that the net pitch requirement is driven by locally identifiable need. This is also consistent with the findings from the stakeholder consultation on Duty to Co-operate where neighbouring Local Authorities identified that they were seeking to address their own needs, but were not making provision for more than this figure. We have also assumed a net nil migration between Local Authorities in Hertfordshire.
- 6.39 We would note that the households involved in recent planning appeals at Esbies and Birch Green wished to move to East Hertfordshire, but the sites they were seeking permission on were in the Greenbelt. As noted above we have counted 5 households who are living on the Esbies site as need from an unauthorised site. The applicant the Birch Green site was not resident at the time of the appeal. Not counting these households as in-migrants does not preclude the further development of new sites in East Hertfordshire. Many surrounding authorities have higher levels of locally generated need and it may be the case that East Hertfordshire can help to provide for their needs. However, this should be done in consultation with neighbouring councils in line with the Duty to Cooperate.
- 6.40 However, rather than assess in-migrant households seeking to develop new sites in the area, we would propose that each case is assessed as a desire to live in the area and that site criteria rules are followed for each new site. It is important for East Hertfordshire to have clear criteria based planning policies in place for any new potential sites which do arise.

Overall Needs for East Hertfordshire

- 6.41 The estimated extra residential site provision that is required now and in the near future will be 12 pitches to address the needs of all identifiable households. This includes the existing households on unauthorised sites, and growth in household numbers due to household formation. Again we would emphasise that East Hertfordshire have provided 15 pitches in the past 7 years to address immediate needs, but also to allow for the growth in families on individual sites.

Figure 8: Extra Pitches which are Required in East Hertfordshire from 2014-2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
Total Supply		0	
Current Need			
Current unauthorised developments or encampments	6		
Concealed households	0	-	
Net movement from bricks and mortar	0	-	
Total Current Need	6		
Future Needs			
Currently on sites with temporary planning permission	0	-	
Net migration	0	-	
New household formation	6	-	
Total Future Needs	6	-	
Total	12	0	12

Requirement by Time Periods

- ^{6.42} The evidence contained in this survey is that there is a requirement in the next 5 years for a total of 6 pitches to address the backlog of need for concealed households and those in bricks and mortar. Household growth is then projected to be 1 pitch over the next 5 years. Therefore the identified requirement in the period 2014-2018 is 7 pitches.
- ^{6.43} From 2019 onwards all future projected growth is for household formations. In the period 2019-2023 this is projected to be 2 pitches and for 2024-2028 this is projected to be 2 pitches. The table below summarises the need over time.

Figure 9: Extra Pitch Provision in East Hertfordshire in 5 Year Periods

East Herts	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	7	1	2	2	12

Public and Private Provision

- ^{6.44} East Hertfordshire does not currently contain a publicly owned Gypsy and Traveller site, but Hertfordshire County Council does operate network of 10 sites across the county and has holds a waiting list for pitches. The households identified as need in this study are all seeking private sites. As noted above it may be that East Hertfordshire accepts a higher level of need through Duty to Cooperate due to neighbouring councils having higher levels of need. In turn these extra pitches may need to be in the form of public provision, but this will need to be determined when the final allocation of need is in place.

Transit/Emergency Stopping Site Provision

- ^{6.45} 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 around 13 weeks and has a range of facilities such as water supply, electricity and amenity blocks.
- ^{6.46} An alternative 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. Some authorities also operate an accepted encampment policy where households are provided with access to lighting, drinking water, refuse collection and hiring of portable toilets at a cost to the Travellers.
- ^{6.47} The Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62A of the Criminal Justice and Public Order Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- ^{6.48} A suitable pitch on a relevant caravan site is one which is situated in the same local authority area as the land on which the trespass has occurred, and which is managed by a local authority, registered social landlord, or other person or body as specified by order of the Secretary of State. In two tier authority areas, where a district council is situated within a wider county council area, the relevant caravan site may be anywhere within the county council area. Case law has confirmed that a suitable

pitch must be somewhere where the household can occupy their caravan and bricks and mortar housing is not a suitable alternative to a pitch.

^{6.49} Therefore, a public transit site both provides a place for households in transit to an area and also a mechanism for greater enforcement action against inappropriate unauthorised encampments. There is currently an operational public transit site in Hertsmere which can be used for enforcement actions for Travellers in any district or borough in Hertfordshire. The site does have problems with households occupying it on an almost continuous basis, but if this issue can be resolved it would provide a transit site for use by households visiting East Hertfordshire.

7. Future plot Provision for Travelling Showpeople

Need for Plots for Travelling Showpeople

- ^{7.1} The estimated need for plots for Travelling Showpeople is typically much simpler to model than for Gypsies and Travellers. In our experience, it is normally the case that there are no unauthorised sites and no plots are expected to be freed for any reason and there is no waiting list for sites.
- ^{7.2} As outlined in Chapter 5, the situation with Travelling Showpeople is that there is only one yard in East Hertfordshire.

Current Travelling Showperson Yard Provision

- ^{7.3} There are currently 31 households and 96 people on the yard in East Hertfordshire. We have assumed that households currently and wishing to live on sites continue to do so and their children will also live on sites.
- ^{7.4} Currently, there are no authorised plots free and no new yards have been granted planning permission. Therefore, there is no space on any yard.

Additional Yard Provision: Current Need

- ^{7.5} The next stage of the process is to assess how many households are currently seeking pitches in the area. Groups of people who are likely to be seeking plots will include those:
- » Households on unauthorised developments for which planning permission is not expected;
 - » Concealed households; and
 - » Households in bricks and mortar wishing to move to sites;

Current Unauthorised Developments

- ^{7.6} There are currently no unauthorised yards in East Hertfordshire.

Concealed Households

- ^{7.7} The on-site survey and satellite images of the existing yard show that it is very full. In particular we would note that the on-site survey shows many older children in their twenties living at home with their parents.
- ^{7.8} However, the household survey also showed a number of single persons living alone and also that the largest household size was 5 persons and the average household size was 3 persons. None of the older

children in their twenties were reported as being in couples so none would typically be considered as being concealed for more general housing assessments. Therefore, while there are likely to be future household formations, there will also be dissolutions and therefore we have not counted any concealed households.

Bricks and Mortar

^{7.9} There is no evidence of any movement between bricks and mortar in either direction.

Additional Site Provision: Future Need

^{7.10} The next stage of the process is to assess how many households are likely to be seeking plots in the area in the future. Groups of people who are likely to be seeking plots will include:

- » Households living on yards with temporary planning permissions;
- » New household formation expected during the study period; and
- » Migration to yards from outside the study area.

Temporary Planning Permissions

^{7.11} There are currently no yards with temporary planning permissions in East Hertfordshire.

New Household Formation

^{7.12} For household growth, the typical growth rate for the Travelling Showpeople population is lower than for Gypsies and Travellers with estimates normally being from 1%-1.5%. Given that existing concealed households have been considered elsewhere we have used the lower of these figures to allow for future household growth. A growth rate of 1% provides for total net growth of 16% over 15 years. Given that there are 31 households on-site this equates to 5 additional households by 2031.

In-migration from Other Sources

^{7.13} On the same basis as Gypsies and Travellers we have allowed for a balanced level of migration on to existing yards. The advantage of allowing for net migration to sum to zero is that it avoids double counting where the modelling of migration clearly identified too low or high a level of total plot provision. An assumption of net nil migration implies that the net plot requirement is driven by locally identifiable need.

Overall Needs for Travelling Showpeople Plots in East Hertfordshire

^{7.14} The estimated extra residential plot provision that is required now and in the near future will be 5 plots to address the needs of all identifiable households. This covers the growth in household numbers due to household formation.

Figure 10: Extra Plots which are Required in East Hertfordshire from 2014-2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty plots	-	0	
Additional supply new yards	-	0	
Total Supply		0	
Current Need			
Current unauthorised developments or encampments	0		
Concealed households	0	-	
Net movement from bricks and mortar	0	-	
Total Current Need	0		
Future Needs			
Currently on yards with temporary planning permission	0	-	
Net migration	0	-	
New household formation	5	-	
Total Future Needs	5	-	
Total	5	0	5

Requirement by Time Periods

^{7.15} All future projected growth is for household formations. The table below summarises the need over time.

Figure 11: Extra Plot Provision in East Hertfordshire in 5 Year Periods

East Herts	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	1	1	2	1	5

Public and Private Provision

^{7.16} Almost all Travelling Showpeople yard provision in the country is private with only a very limited supply owned by public bodies. There is no indication of any need for a public Travelling Showpeople site in East Hertfordshire, so all provision is likely to be on private sites.

Appendix A: Existing Gypsy and Traveller Residential Sites in East Hertfordshire

Gypsy and Traveller Sites in East Hertfordshire

Site	Number of Pitches
Local Authority Sites	-
TOTAL PITCHES ON LOCAL AUTHORITY SITES	0
Private Sites with Permanent Permission	
Nine Acres, High Cross	8
Field Farm, Levens Green	6
The Stables (formerly Rumballs Hump)	8
TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION	22
Private Sites with Temporary Permission	-
TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION	0
Tolerated Sites – Long-term without planning permission	-
TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES	0
Unauthorised Developments	
Elmfield Stables	1
Esbies Estate	5
TOTAL PITCHES ON UNAUTHORISED DEVELOPMENTS	6
TOTAL PITCHES	28

Appendix B: Existing Travelling Showpeople Residential Yards in East Hertfordshire

Travelling Showpeople Yards in East Hertfordshire

Site	Number of Plots
Local Authority Yards	-
TOTAL PLOTS ON LOCAL AUTHORITY YARDS	0
Private Yards with Permanent Permission	
Rye House Caravan Park	40
TOTAL PLOTS ON PRIVATE YARDS WITH PERMANENT PERMISSION	40
Private Yards with Temporary Permission	-
TOTAL PLOTS ON PRIVATE YARDS WITH TEMPORARY PERMISSION	0
Tolerated Yards – Long-term without planning permission	-
TOTAL PLOTS ON LONG-TERM TOLERATED PRIVATE YARDS	0
Unauthorised Developments	
TOTAL PLOTS ON UNAUTHORISED DEVELOPMENTS	0
TOTAL PLOTS	40