

Analysis of WDC Gypsy & Traveller Accommodation Assessment

1. Executive summary

This analysis identifies multiple flaws and major issues with the GTAA. In summary:

- the projected need simply does not sanity check - it provides for 150% of the EXISTING TOTAL POPULATION of Gypsies and Travellers in WDC !
- the numbers in the report are not statistically significant
- detailed evidence cited in the GTAA is contradicted by the mathematical analysis of the supposed need
- the methodology used is at variance with DCLG guidance
- assumptions used are both at variance with DCLG and in critical areas are simply unsubstantiated
- there is no evidence of attempts to consult and co-operate with neighbouring authorities to check (a) cross boundary need and (b) to see if existing sites could be used
- the team from Salford University which did the GTAA are demonstrably not experts in this area, they are not independent nor objective and other authorities have rejected their methodology
- WDC have failed to follow up on a number of crucial recommendations in the GTAA which almost certainly would change the assessed need.

2. Introduction

In November 2012 WDC published its GTAA (Gypsy & Traveller Accommodation Needs Assessment). This report was supposed to be an independent assessment of G&T accommodation needs using a "robust" evidence base. The report was produced by Lisa Scullion and Philip Brown of the Housing and Urban Studies Unit of the University of Salford.

This analysis shows that the GTAA is seriously flawed, one sided and demonstrates a specific agenda by the report's authors. This analysis does not set out in any way to suggest alternative need figures – there may well be an unmet need for accommodation for Gypsy & Travellers in WDC but as this analysis shows, the GTAA is not a safe or sound basis for estimating it

3. Analysis

a. overall logic / sense

It is apparent that the results from the GTAA have not been sanity checked against simple publicly available data and grossly over-estimates the need based on such numbers.

i. 2011 Census

This informed that 58000 people identified themselves as Gypsy or Irish traveller much lower than the 300,000 claimed by the author of the WDC GTAA. It also informed that 83% of all G&T live in bricks and mortar. This is well in excess of the “3 times as many as site based households” used as a metric in the WDC GTAA and the 50% used by the Salford team in other GTAA’s.

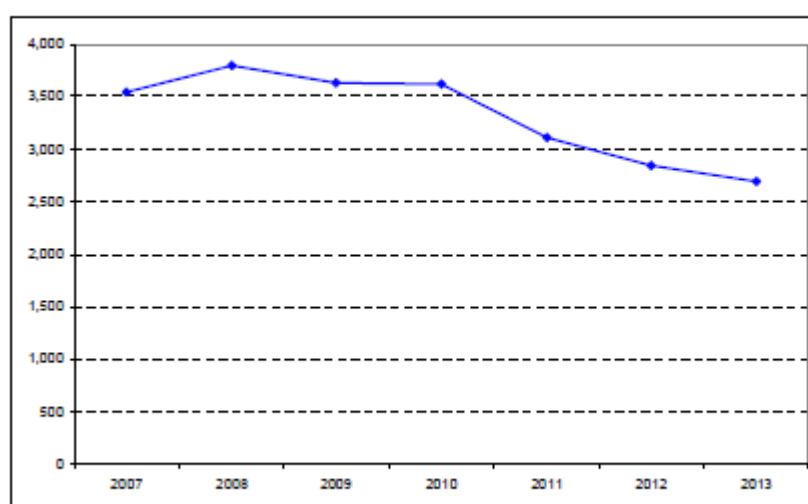
ii. the Bi-annual caravan count

this is an exercise run by DCLG and summary statistics from the 2013 publication are given in the two tables below

Month	Year	Total	Caravans on Unauthorised Sites		Caravans on Authorised Sites						
			Number	%	Socially rented		Private		Total		
					Number	%	Number	%	Number	%	
Jan	2008	17,844	3,797	21.3	6,696	37.5	7,351	41.2	14,047	78.7	17,844
Jul	2008	17,572	3,936	22.4	6,553	37.3	7,083	40.3	13,636	77.6	17,572
Jan	2009	17,813	3,628	20.4	6,785	38.1	7,400	41.5	14,185	79.6	17,813
Jul	2009	17,437	3,729	21.4	6,603	37.9	7,105	40.7	13,708	78.6	17,437
Jan	2010	18,370	3,619	19.7	6,870	37.4	7,881	42.9	14,751	80.3	18,370
Jul	2010	18,134	3,636	20.1	6,862	37.8	7,636	42.1	14,498	79.9	18,134
Jan	2011	18,383	3,109	16.9	6,942	37.8	8,332	45.3	15,274	83.1	18,383
Jul	2011	18,723	4,022	21.5	6,615	35.3	8,086	43.2	14,701	78.5	18,723
Jan	2012	18,746	2,850	15.2	6,800	36.3	9,096	48.5	15,896	84.8	18,746
Jul	2012	19,413	3,158	16.3	6,829	35.2	9,426	48.6	16,255	83.7	19,413
Jan	2013	18,729	2,693	14.4	6,934	37.0	9,102	48.6	16,036	85.6	18,729

The table contains the latest figures, including amendments made to originally published figures and estimates for missing data as necessary.

Figure 4: Number of caravans on unauthorised sites in England (January counts only)



These figures inform us that 18,729 caravans were last counted. Using the GTAA ratio of 1.6 caravans per pitch and 4 people per caravan, this equates to 11705 pitches and 74916 people.

Of these a declining number 2693 and proportion (less than 14% in 2013) were in unauthorised sites – it is those who require providing with pitches now- the numbers equate to 1683 pitches and 10,772 people.

The WDC GTAA figures of providing 25 pitches immediately means WDC believes it needs to provide 1.5% of the national shortfall. But there are 468 local authorities and if G&T were spread evenly across the country then WDC would need to provide 3.6 pitches (1683/ 468). Actually 25% of all G&T are in London and the South East so this assumption is highly conservative for WDC.

Additionally the figures from the last five caravan counts (data provided by Local Authorities themselves! shows that Warwick only has 16 caravans “not tolerated” (This was the Kites Nest site). So the need for WDC from this data is $16 / 1.6 = 10$ pitches not the 25 in the GTAA.

Table 1: Count of Gypsy and Traveller Caravans 17 January 2013: last five counts											
Local authority	Count	Authorised sites (with planning permission)				Unauthorised sites (without planning permission)				Total All Caravans	ONS code
		No. of Caravans Socially Rented ¹	Private Caravans			No. of Caravans on Sites on Gypsies' own land		No. of Caravans on Sites on land not owned by Gypsies			
			Temporary Planning Permission	Permanent Planning Permission	All Private Caravans	"Tolerated"	"Not tolerated"	"Tolerated"	"Not tolerated"		
	201107	46	2	10	12	0	0	0	0	58	E06000020
	201101	45	2	10	12	0	0	0	8	65	E06000020
Walsall ²	201301	21	5	23	28	0	0	0	0	49	E08000030
	201207	23	6	20	26	2	0	0	0	51	E08000030
	201201	21	5	23	28	0	0	0	0	49	E08000030
	201107	28	6	27	33	0	0	0	0	61	E08000030
	201101	30	4	22	26	0	1	2	4	63	E08000030
Warwick	201301	0	0	0	0	0	15	0	0	15	E07000222
	201207	0	0	0	0	0	15	0	4	19	E07000222
	201201	0	0	0	0	0	16	0	0	16	E07000222
	201107	0	0	0	0	0	16	0	0	16	E07000222
	201101	0	0	0	0	0	16	0	0	16	E07000222
Wolverhampton	201301	40	0	0	0	18	0	0	0	58	E08000031
	201207	40	0	0	0	22	0	0	0	62	E08000031
	201201	40	0	0	0	23	0	0	0	63	E08000031
	201107	40	0	0	0	22	0	1	5	68	E08000031
	201101	40	0	0	0	7	5	0	0	52	E08000031

iii. 2011 WDC report

In April 2011 WDC “Evidence of Local Needs and Historic Demand for Gypsy & Traveller Sites in Warwick District” said the demand for permanent site-based accommodation in the area was ‘low and transitory in nature’. The report recommended a transit site for 15 caravans. This is outside of the GTAA 31 sites and in fact is being built by Warwickshire County Council.

It is therefore interesting to ask how in one year the need leapt from zero to 25 and thence to 31.

d. sanity check

Paragraph 6 of GTAA Executive summary says 124 individuals were “resident in study area” yet GTAA recommends 31 pitches * 1.6 caravans per pitch (accepted minimum) and 4 people per caravan = accommodation for 198 people, NEARLY 1.5 times the number of people currently living in the area!

This makes no sense especially when correlated with the data from the Census, the Caravan count and WDC’s own previous figures.

e. Credibility and experience of Salford team

The GTAA authors, Scullion and Brown have no specific expertise other than having done a number of other GTAA’s. They have no known formal training in carrying out quantitative assessments and the absence of any basic statistical tests of their results demonstrates at best an amateurish approach.

Brown is known in academia as pursuing an extreme line of research claiming there are 300,000+ Gypsy & Travellers in the UK. Yet Government figures which are accepted by the National Gypsy Council show 58,000. He is widely challenged by his peers for trying to evidence his claims in everything he does.

Someone with his views and theories cannot possibly be seen to be independent and objective when authoring a GTAA.

The work of the Salford team has been challenged and rejected by other councils due to flaws in its methodology. It is highly notable that after a veritable ‘rash’ of GTAA publications 2004 -2011 Scullion and Brown have not published any since – the off the record view is this reflects the established flaws in their process and lack of objectivity.

Throughout the GTAA references are made to papers and publications which are inferred to be independent but in fact there are no references in the GTAA relating to work of anyone other than then current or ex-members of the Salford team (excepting Central Government departments). However the GTAA authors represent the references quite differently e.g.:

- Para 6.1 cites Commission for Racial Equality 2006 report “Common Ground: Equality, good race relations and sites for Gypsy’s and Irish Travellers” was actually written by author of GTAA P Brown

- para 3.2 cites references Niner P (2002) Review of the ODPM Caravan count – P Niner is ex member of Salford team

Para 8.1 claiming a need for 6000 additional pitches immediately refers to a publication *Assessing local housing authorities’ progress in meeting the accommodation needs of Gypsy and Traveller communities in England and Wales :Update 2010*. Equality and Human Rights Commission - this was authored by Brown, P., Henning, S. and Niner, P (2010)

This at best shows a lack of rigour and honesty and at worst can be construed as trying to drive through their own agenda.

f. Methodology

The key issues with the methodology adopted by the Salford team are:

i. **The survey was conducted by Gypsy & Travellers.** The survey which provides all the data the results of the GTAA were based on was conducted by Sharon and Tracey Finney who are acknowledged as members of Gypsy & Traveller community. As many of questions in GTAA survey were qualitative which in itself is a flaw, it is right to question to the objectivity of the Ms Finney's. As an analogy would the reader put weight on a survey into attitudes of people towards the war in Afghanistan if they knew it was conducted by people who were anti-war?

ii. **They surveyed people living in houses** The Housing Act 2004 placed a duty on Councils to assess G&T accommodation needs. Nowhere does it say this should include an assessment of those in bricks & mortar wanting to have a caravan on a permanent site. The author of this analysis cannot find any guidance or law anywhere which says that has to be or should be done. Yet the GTAA did exactly that. In fact 18 or 42% of respondents lived in bricks and mortar.

iii. **Ignored the bi-annual caravan count.** Para 1.6 of GTAA states it reviewed data from the bi-annual caravan count yet it's clear from the body of the report that it was disparaged and then ignored.

Section 3.2 report referring to the bi-annual Caravan count states "there are a number of well documented issues with the robustness of the count". It goes on to say " It references Niner P (2002) Review of the ODPM Caravan count. It should be noted that:

- a) P Niner was a member of the Salford team and an acolyte of P Brown GTAA author – this is NOT an independent reference
- b) There have been material changes in the 12 years since Niner's report to the count to improve its accuracy which Brown et al should have been well aware of and mentioned in the report
- c) ALL other bodies (DCLG, National Gypsy Council) and virtually all other GTAA's accept its data

In section 3.2 it goes on to say "It should be noted that the analysis contained in this report should be considered a more robust assessment of the current situation with regards to the local population than the Caravan Count."

So simply the Caravan Count which would imply an order of magnitude lower need is virtually ignored.

Surely a 'safe' academic study would show a range of need drawn from a variety of data sources rather than rejecting all others in favour of its own, I believe flawed methodology?

iv. **Did not review data from key stakeholders.** Para 1.6 of GTAA states it reviewed data from key stakeholders and "this information has been incorporated into this

report in the appropriate places". Nowhere in the GTAA is this data clearly presented and there is no evidence anywhere in the GTAA that this was done

v. **assumes that people who live in houses are "nomadic"**. In para 2.17 the report says it "focuses more narrowly upon people who either still travel or have ceased to do so as a result of specific issues and can as a consequence demonstrate specific land use requirements". However the GTAA does not question WHY G&T decide to live in houses and assumes therefore that they do not WANT / PREFER to and that they therefore form a population that is still "nomadic". This is wholly and obviously flawed. If someone has decided that they can have a better quality of life e.g. health and education for their family by living in a house they have by definition decided to stop being "nomadic".

vi. **Makes its own definition of "housing"**. In section 2.20 it states that "Crucially for Gypsy & Travellers, the definition of housing need is varied slightly to acknowledge the different contexts in which members of these communities live". There is no guidance from DCLG to allow change in this definition. This is clearly Salford making changes to suit their own agenda.

vii. **Makes its own decisions as to methodology**. In section 2.21 the report states "GTAA (i.e. DCLG) guidance has been used in developing the methodology but variations to the approach have been made to take account of local circumstances where considered appropriate". There is no guidance from DCLG to allow change in this definition. again this is Salford making changes to suit their own agenda

viii. **Broadens definition of need**. In section 2.22 the GTAA states "In the context of bricks and mortar dwelling households, need may take the form of those whose existing accommodation is overcrowded or unsuitable (including unsuitability by virtue of psychological aversion to bricks and mortar accommodation)."

There is nothing the author of this analysis can find in planning policy or DCLG guidelines which relates to this. More importantly there is no formal published research which relates to "psychological aversion to bricks and mortar accommodation" This is something invented by the Salford team (If there were such a study it should be referenced amongst all the others in the GTAA)

ix. **Uses its own ratios of caravans per pitch**. In section 2.27 the report decides on the basis of only "ten resident trailer-based interviewees" to use a ratio of 1.6 caravans per pitch compared to DCLG guidance of 1.7 and national average of 1.9. Again another example of Salford ignoring guidance to suit their own agenda (the difference would mean a requirement of 29 rather than 31 pitches)

x. **Did not take account of nor was revised around 2011 census data**. The GTAA notes that when the survey was conducted 2011 Census data was not available and in section 11.8 of GTAAA it states that "more work needs to take place around estimating the size of the housed population and monitoring their accommodation need. Some of this may be made possible as a result of findings from Census 2011 which included the ethnicities of Romany Gypsy and Irish Traveller".

However the census data was published between July and November 2012 and so could have been incorporated into the GTAA. As it transpires the census data demonstrates a radically different situation than that represented in GTAA. There is no evidence from WDC that the GTAA has been reviewed in light of the census data

xi. Distorts key aspect of results with irrelevant question re Accommodation affordability

In paragraph 7.11 the GTAA states “In order to explore issues of accommodation affordability we asked respondents if they could afford to purchase any of the following: a pitch on a private site with planning permission; pitch on a private site without planning permission; land to be developed into a site.

7.12 Eleven respondents (26%) indicated that they could currently afford to purchase land to be developed into a site; eight of these were currently stopping on unauthorised encampments, while three were living in bricks and mortar accommodation (all of which were renting their houses).

Within these eleven households, three people could also afford to buy a pitch on a private site.”

The question asked was “QG26. Could you currently afford to purchase any of the following? **(Please tick all that apply)**

A pitch on a private site with planning permission

A pitch on a private site without planning permission

Land to be developed into a site

Cannot afford to purchase land or a pitch

Not relevant **(please specify below)**”

The key point here is that the question is meaningless as the cost of any of the options was not defined. The answers would clearly be very different if the price of pitch was £10k or £100k and without knowing the price how can anyone answer “cannot afford to purchase land or a pitch”? Equally how can the GTAA state with any confidence the responses in 7.12 above?

As affordability is a KEY issue as WDC expects the sites to be self-financing, this issue on its own makes the GTAA unsafe

xii. **Decided on its own assumptions.** At paragraph 8.3 the GTAA states “Despite all local authorities across England completing a first round of Gypsy and Traveller Accommodation Needs Assessments (GTAAs) over the 2006-2009 period, the methods of assessing and calculating the accommodation needs of Gypsies and Travellers are still developing. The model drawn upon here derives from a number of sources including:

-The Guidance on Gypsy and Traveller Accommodation Assessments.²⁴

- Guidance for Regional Planning.²⁵

- Knowledge and experience of assumptions featuring in other GTAAs and results of EiP tests of GTAAs

-The emerging messages arising from the recent CLG consultation document ‘*Planning for Travellers*’; for example, establishing need from a robust evidence base, ensuring involvement of a range of key local stakeholders (see paragraph 2.12 for further details).”

This paragraph is actually a non-sense as the GTAA in section 2.21 (as shown elsewhere in this analysis) explicitly says “GTAA (i.e. DCLG) guidance has been used in developing the methodology but variations to the approach have been made to take account of local circumstances where considered appropriate”

Undue weight has clearly been placed on “Knowledge and experience of assumptions featuring in other GTAA’s and results of EiP tests of GTAA’s” and as there are no references to indicate the contrary one would assume the only knowledge the report’s authors have of other GTAA’s is ones they have done themselves – so basically they are just re-using what is shown by this analysis and by the rejection by other Local authorities to be a flawed methodology.

g. Issues with Numbers and statistics

- i. Throughout the report it uses different baseline numbers:
 - a. In the Exec summary para 3 it says it surveyed 43 Gypsy, Traveller and Travelling show people households
 - b. In Exec summary para 4 it contradicts para 3 saying there is a base population of 33 “resident households” and they surveyed 28 households , 85% of the estimated G&T community
 - c. 28 of 43 is not 85% it is 65%
 - d. However para 1.6 (page 11) of report states unequivocally they interviewed 43 households – this cannot be the case as this represents more than the base population
- ii. The survey results are at an elementary level not statistically significant – if indeed there are 43 households in WDC to get a statistically significant result at the 99% level (which is what most researchers use) with a confidence interval of 5, they should have surveyed 40. Even if you go with the alternative figure of 33 households at a 99% confidence level they needed to survey 31 households.

it is therefore not possible to accept the results of the survey are statistically significant and can be extrapolated.

- iii. Para 8 of the Exec Summary states that “there are no signs that the growth in the G&T population will slow significantly”. It claims research from Equalities and Human Rights Commission shows “around 6000 additional pitches will be required ...”

This research was undertaken by members of the Salford study team, it was not independent – you cannot rely on your own previous research as a baseline. Further , 6000 pitches at 1.6 vans per pitch provides accommodation for 38,400 people but there are only 58,000 G&T living in the UK and 83% live in bricks & mortar !

Additionally even if the G&T population grew by 5% per annum (which is over known historical trends) and ALL of these people wanted to live in caravans (but 83% choose to live in bricks & mortar) this means 4913 pitches would be required over the next 10 years. Assuming 83% live in houses (a figure Government stats show is actually increasing) then only an additional 5345 people need caravans which equates to 835 extra pitches nationally or just under 2 per Local Authority!

- iv. Table 1.1 (page 12) (Sample in relation to local G&T population) is utterly erroneous as this means they interviewed more households than they say exist in the area.
- v. Table 3.3 page 22 footnote 15 -the report claims that assuming that 3 times as many G&T live in houses as live “trailer based” “may be excessive”. Yet Government stats show 83% and rising, a figure which is accepted by the national Gypsy Council.
- vi. Para 4.2 GTAA report states that “There are currently no socially rented sites within the district of Warwick. Warwick District Council indicated that they did have plans to provide a Gypsy and Traveller site within the area over the next five years. The location, number of pitches and whether it would be permanent or transit were unknown; however, the Council indicated that they had been proactively seeking land for a transit site.”

It should be noted that:

- At the time the GTAA was written WCC were actively engaged in looking at a transit site – why did Salford not discuss this with WCC?
- As the transit site was agreed in 2013 why was the GTAA not reviewed in the light of this new information?

vii. The section 8.8 Summary of G&T accommodation and pitch needs

- Row 6 New household formation , one pitch required – one household in the survey indicated that daughter would leave home when married. it is erroneously assumed she would need a pitch –this is wrong because:
 - a) If 83% of G&T live in bricks and mortar there is an 83% chance this lady will
 - b) The lady is not married so her potential husband may wish to live somewhere completely different
- Row 8 Net movement from housing to sites , one pitch required –one household intends to move into a caravan:
 - a) There is no guidance saying this has to be or should be considered
 - b) They have been living in a house for 3-5 years and in the area for more than 10 years. In no way can they be fairly described as having a “nomadic” way of life.
- Row 10 Unauthorised encampments – 16 pitches required –this has to be incorrect as:
 - a) The assumptions are patently ludicrous i.e.

“**Calculation:** number of encampments (18) multiplied by average encampment size (in households - 6) = 108 separate households minus 25% = 81 separate households involved in unauthorised encampments”

Assuming 4 people per household this means 324 people which is nearly 3 times as many as total G&T population found to be in the study area in the GTAA!! The underlying assumption is that 75% i.e. 81 households in the encampments were all different ones. If this was the case they would almost certainly be transit. These assumptions are fundamentally at odds with the survey findings in section 5.23 which to re-iterate state:

- o All those in unauthorised encampments were Irish travellers NOT Romany Gypsy

- 20% (3) of them have a base elsewhere in UK –so if they need a site in WDC its transit not permanent (WDC has no obligation to provide a household with a permanent base elsewhere another one)
- 87% (13) have been in the area for less than 1 month – they are PASSING through = TRANSIT
- 6% (1) had been in the area for 1 to 6 months
- 6% (1) had been in the area for 6-12 months
- 9 moved / travelled each day
- 5 moved /travelled every week
- 1 moved / travelled a few times a year
- “the majority of respondents indicated that they travelled around – often during summer months-staying on any sites that were available”

Simply these respondents are truly “nomadic” and require transit rather than permanent sites.

In section 8.18 the GTAA says “5 (33%) were interested in moving to a residential pitch in the study area”. This comes out of thin air - there is nothing about this in the main section of the report which analyses in otherwise great detail the survey responses from people on unauthorised encampments. there is no evidence presented of need for permanent accommodation from people 87% of who have only been in the area for less than a month yet the GTAA authors conclude 16 pitches are needed for these respondents immediately.

The GTAA goes on to assume that 1 in 5 households on unauthorised encampments want permanent residential pitches. There is no substantiation of this ‘1 in 5’ in the GTAA survey results or by reference to other surveys other “than it has been applied to other GTAA’s” – if the ratio is wrong / unsubstantiated, applying it to other GTAA’s doesn’t make it right. It is at best highly questionable especially as this is a key assumption and ratio which drives half of the ‘identified’ need.

THIS SECTION OF THE GTAA IS CLEARLY UNSOUND AND UNSAFE

- Row 11 – no movement between areas – this is simply illogical. If there was no movement then ALL those surveyed would be staying in WDC and would ALL need accommodation and there would be no need for transit sites
- Row 13 states “There are no sites with any vacancies within the study area” –this is true but there is an obligation imposed by DCLG and NPPF on co-operating with adjoining authorities. There is no evidence in the GTAA that this was done. Had it been done, the significant spare capacity in Rugby would have been noted.
- Row 15 and 17 which state 2 * 3 pitches are required – these have been calculated on the basis of a 3% p.a. growth – points to note :
 - a) The 3% is because “it has been common in similar studies” – this does not make it right or accurate
 - b) It is assumed that “all household growth is assumed to require a site based solution” - this cannot be right if 83% and growing of all G&T live in Bricks and mortar. Indeed if 83% do live in houses the 3% growth would mean that only 1 extra pitch is required between 2017 and 2026 not the 6 forecast.

h. OTHER POINTS

i. In section 3.3 commenting on the Caravan count data the GTAA say “Since July 2010 a consistent number of caravans (sixteen) has been recorded on a 'not tolerated' unauthorised development. There have been very few caravans recorded on unauthorised encampments over the period. This is in contrast with the information provided by Warwick District Council on the number of encampments that have occurred, which suggests a relatively large number of encampments occur each year (see section on unauthorised encampments in Chapter 5).”

This is nonsense as the data for the caravan count largely comes from local authorities and must have come from WDC itself. The unauthorised encampments referred to are shown later in the GTAA to be largely associated with one family and the annual gathering of G&T at Kenilworth which is an issue for TRANSIT sites not permanent sites.

ii. paragraph 5.4 states that Kites Nest Lane whilst unauthorised had 13 pitches but only 7 were occupied – if there was massive need in the district surely those 6 pitches would have been occupied

Similarly the large site at Ryton on Dunsmore has had a high level of under-occupation for a long while.

iii. paragraph 5.52 states “households on unauthorised encampments were mostly those in transit” – “reported by WDC and Warwickshire Police that the households on unauthorised encampments were predominantly Irish Travellers”. As stated from the survey results the vast majority of this group of G&T had been in the area for less than a month and the qualitative results of the survey show that they want transit not permanent sites.

iv. The GTAA in Para 6.2 “Estimating the size of Gypsy and Traveller population in bricks and mortar housing” states

“6.2 Warwick District Council indicated the following:

- Gypsies and Travellers are specifically referred to in its current housing and homelessness strategy.
- Gypsies and Travellers are identified in ethnic monitoring records in relation to housing applications/allocations.
- There was currently one household which ascribed as being a ‘Gypsy or Traveller’ registered for affordable housing.
- There were no households re-housed who ascribed as being a ‘Gypsy or Traveller’ during 2011.
- There were no homelessness applications ascribed as being a ‘Gypsy or Traveller’ over the last 12 months.
- It was suggested that the number of Gypsies and Travellers moving into affordable housing had remained broadly the same over the last five years, and was anticipated to remain the same over the next five years.”

The points of note here are:

- If there was an unmet need to G&T accommodation surely there would be known demand for housing from G&T?
- There would surely be homelessness applications
- This shows no need
- Also shows no increase in need for affordable housing
- If 75% or 83% are in housing now (124 individuals *83% = 103 individuals) this means that there are only 21 other individuals or 5 or 6 households who are in caravans – NUMBERS do NOT stack up

v. In paragraph 6.13 the GTAA states “With regards to length of time in their current house, ten respondents (56%) indicated that they had lived there for ten years or more; four respondents (22%) had lived there for between five and ten years; two respondents had lived there between three and five years (11%); and two respondents between one and three years (11%).”

These cannot be people who can in anyway be described as “Nomadic” !!!

vi. Paragraphs 6.15 – 6.18 “6.15 Ten respondents (56%) indicated that they never travelled. The most common reason was children’s education (six respondents - 60%); however, respondents also made reference to older age (two respondents – 20%) as well as individual reasons relating to a need to settle down, lack of transport and more personal reasons. The last time people had travelled ranged from two to twelve years ago.

6.16 With regards to the eight respondents (44%) who did travel, four travelled a few times a year; three travelled once a year; and one indicated that they “*move when we need to*”. When asked where they tended to go to, four respondents made reference to travelling to the fairs (for example, Appleby and Stow). Following this, respondents gave individual responses with no specific geographic location featuring as most common. The responses included: Bournemouth; Devon; Kent; Leicester; Peterborough; Skegness; and Torquay. Five respondents travelled with one caravan; the remainder did not provide information on how many caravans they travelled with. One respondent indicated that they travelled with equipment (a horse box).

6.17 Five of the eight respondents (63%) had travelled in the last twelve months. People had travelled for a number of reasons, including work and holiday; however, the reason that was mentioned most frequently was to visit relatives/for family events seven respondents). With regards to where people stayed while travelling, one respondent made reference to staying at the roadside; however, the most common responses were staying at caravan parks or staying with family on their sites”

Quite simply these respondents were people travelling to go on holiday – they do not need permanent pitches for this – perhaps transit pitches in other areas?

- vii. paragraph 7.3 states “3 respondents need to move immediately” the GTAA allows us to analyse these one by one:

i) one had been in area for more than 10 years and in house 3-5 years –
“They needed to move to be on-site based accommodation” - NO they are not “NOMADIC”

ii) second person was on unauthorised encampment and as per paragraph 5.23 was Irish Traveller – been in area less than a month, had a base in Leeds, did not know if they intended to stay in the area. “main reason they needed to move was to travel” – they already have a base (a home) elsewhere and don’t want to stay in area – so there is no need here

iii) third person again on unauthorised encampment less than one month in area, didn’t know if would stay in area but anyway “looking for socially rented site”. They had a base in Derby where they went back to each winter. So TRANSIT need.

viii. Paragraph 7.4 states that two other respondents (again in unauthorised encamps (Irish Travellers) wanted permanent site based accommodation but both been in area less than a month.

“Remaining six respondents did not know if they intended staying.”
“there wanted sites elsewhere in UK”, “one wanted roadside stopping places” two others wanted own site with planning permission”

The clear point here is that these were Irish travellers who in section 5.2 said they pretty much travelled the whole time and they DO NOT Want permanent sites - so the need here is TRANSIT not permanent

ix. Paragraph 7.13 states “Respondents were also asked how much they paid per month in rent or mortgage for their current accommodation. In the study area, this question was only of relevance to those living in bricks and mortar accommodation as the respondents on the unauthorised encampments, unauthorised development and Travelling Show people site did not pay rent. The majority of respondents in bricks and mortar accommodation (72%) were paying between £60 and £89 per week. One respondent indicated that they were paying between £90 and £119 per week. The remaining respondents did not know, did not want to say or did not pay rent/mortgage.”

7.14 ““I have two sons and when they get married there are no sites round here. Some of the travelling men who own sites want to charge too much rent, that's why we're in a house. We need more council sites”.

Whilst the following is not any criticism or flaw in the GTAA as WDC expect the G&T to pay for site acquisition and development, the ability of G&T to pay rent IS MATERIAL otherwise the economics do not work. Assuming the following costs:

a. Land cost / pitch £10k

- b. a minimum of £65k / pitch development costs (Government stats)
- c. no infrastructure costs – probably a very conservative assumption

A pitch will cost £75k to develop. Assuming rents of £60 per week =24 years to breakeven or at £100pw = 14.5 years to breakeven. Neither of these figures represents a reasonable rate of return so it is entirely right to question why anyone will develop sites.

- x. Paragraph 11.2 “It was evident that there was suppressed need from people living in bricks and mortar accommodation. “

This is a view of the GTAA author and is not supported by any quantified evidence presented in the GTAA

- xi. Paragraph 11.4 “It is possible that a proportion of the accommodation need within the study area can be met in the first five years (2012-2016) by regularising the existing unauthorised development. However, this would need to be balanced against the appropriateness of the site in relation to the current, or emerging, planning policy active in the area.”

WDC have produced no evidence to show they followed through on this

- xii. Paragraph 11.5 “Steps should be taken to address the provision of affordable site-based accommodation for those who require it; for example, those who cannot afford to buy land to develop a site or buy a pitch on a private site.”

However WDC’s proposals do not appear to address this.

- xiii. Paragraph 11.8 “The long term accommodation needs arising from Gypsy and Traveller households in bricks and mortar accommodation continue to be largely unknown. Although this assessment has been successful in including a large proportion of this group more work needs to take place around estimating the size of the housed population and monitoring their accommodation need. Some of this may be made possible as a result of findings from Census 2011, which included the ethnicities of Romany Gypsy and Irish Traveller.”

As stated elsewhere in this analysis, this data was published within the timescales of the GTAA which should therefore have considered it. Despite the fact it was omitted, WDC has had plenty of time subsequently and should clearly have re-considered the GTAA methodology, findings and conclusions in the light of the Census findings which drive a coach and horses through the fundamental assertions of the GTAA authors.