

South Worcestershire
Addendum to Worcestershire GTAA

South Worcestershire Councils
(Malvern Hills, Worcester City and Wychavon)

Final Report

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1. Overview

- 1.1 arc⁴ Ltd was commissioned in July 2016 to prepare a South Worcestershire addendum to supplement the Worcestershire Gypsy and Traveller Accommodation Assessment (November 2014).
- 1.2 The need for an addendum report has arisen due to:
 - Questions relating to the Worcestershire GTAA being raised at the Baughton Traveller Site appeal;
 - The change in definition of Travellers in the Planning Policy for Traveller Sites (PPTS August 2015).
- 1.3 Regarding the issues raised at the Baughton Traveller Site appeal, there are four matters to consider:
 - The number of pitches on authorised Traveller sites in South Worcestershire at the time of the Worcestershire GTAA (February 2014).
 - Whether the pitch turnover rate in Malvern Hills District should be 60% (proposed by SWDP Inspector), 20% (suggested by Baughton Inspector) or another rate;
 - Whether Traveller sites which have personal conditions and / or lack of Gypsy / Traveller restrictive conditions should be included in the supply of pitches.
 - Whether the 6 families at the temporary Traveller site at Baughton should be added to the overall level of need for pitches identified in the GTAA in Malvern Hills District.
- 1.4 The South Worcestershire addendum therefore focuses on the following issues:
 1. Verify the number of pitches on authorised traveller sites in South Worcestershire at the time of the Worcestershire GTAA. This will include site visits and, where possible, photographic evidence of pitch numbers;
 2. Advice on pitch turnover rate for Malvern Hills District in light of evidence presented at the SWDP Examination, Baughton appeal and any other relevant evidence;
 3. Advice on whether the 6 families at the temporary Traveller site at Baughton should be added to the overall level of need for pitches in the GTAA in Malvern Hills District;
 4. Advice on whether Traveller sites which have personal conditions and/or lack of Gypsy/Traveller restrictive conditions should be included in the supply of pitches.
 5. Advice on whether there are any implications for the South Worcestershire traveller needs requirement arising from the Government's change in definition of Travellers in the PPTS.

- 1.5 This addendum will be used to inform planning decisions and any appeals relating to Traveller sites in South Worcestershire.

2. Methodology

Updating site and pitch information

- 2.1 During June and July 2016, site visits were carried out across the three local authority areas. Officers from Malvern Hills and Wychavon accompanied arc4 representatives and notification of the site visit in Worcester was given to the relevant officer. The result of the site visits was a comprehensive assessment of the number of pitches on sites. This was supplemented with pitch data provided by the Councils.
- 2.2 From the work carried out, it was possible to verify the number of sites and pitches which would have been extant in 2014; identify the number of additional sites/pitches granted consent since the GTAA was carried out; and indicate whether there is any potential for additional pitches on existing sites.

Assessing Turnover

- 2.3 When undertaking research into the future housing requirements of households in a housing system, it is vital that both need and supply factors are taken into account. One of the key aspects of supply relates to the ability of households to move onto a pitch which had previously been vacated. Data collected as part of a GTAA allows for a detailed analysis of who has moved onto a pitch and uses this as a basis for estimating the likely supply of existing pitches coming forward in the future. Turnover rates over the previous five years generally provide the most up-to-date and robust evidence available of likely future turnover rates for the next five years.
- 2.4 The 2007 CLG Guidance on preparing GTAA's (Para 62 bullet 2 – page 17) says that pitch turnover on managed sites is information currently held by local authorities that can be used to inform the assessments. CLG consultation on Planning and Travellers (September 2014) provides draft Guidance on undertaking GTAA's in Annex A. Paragraph 4 lists sources of information that local authorities can use in assessing Traveller accommodation needs. One of the sources of information is site management information, including pitch turnover. The principle of including turnover in assessing Traveller accommodation needs is therefore accepted in Guidance. It is also consistent with the approach in Strategic Housing Market Assessments (SHMAs) which also takes account of turnover. Furthermore, the note on the DCLG website summarising the former 2007 guidance¹ states that *'this guidance aims to provide advice on carrying out an assessment of the accommodation needs of gypsies and travellers. It is not exhaustive or prescriptive. While it is recommended that the basic principles outlined here should be followed, the exact approach will need to be adapted to local circumstances'*².

¹ This guidance was withdrawn on 7th March 2014 and replaced by NPPG

² <https://www.gov.uk/government/publications/gypsy-and-traveller-accommodation-needs-assessments>

- 2.5 The principle of including turnover has been accepted as a valid methodological approach in recent inquiries including the 2015 South Worcestershire Development Plan examination (with adjustments to the calculations suggested by the Inspector) and the Carlisle Local Plan Inquiry.
- 2.6 This report considers the likely levels of turnover across sites in South Worcestershire and the impact this is likely to have on the overall need for pitches.

3. The relationship between sites, pitches and households

- 3.1 One of the key challenges faced when assessing Gypsy and Traveller pitch requirements is determining the actual nature of sites, the number of pitches on sites and how this relates to the number of households who can be accommodated.
- 3.2 PPTS (August 2015) refers to the need for Local Planning Authorities to 'identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of sites against their locally set targets' and 'relate the number of pitches/plots to the circumstances of the specific size and location of the site and the surrounding population's size and density'.
- 3.3 Planning decision notices in recent years usually refer to the number of pitches on a site. Older decision notices, however, have tended to specify what can be on a site e.g. number of statics, tourers; or specific individuals and/or households, without necessarily specifying the number of pitches.
- 3.4 As part of the GTAA, it is essential that the characteristics of sites, the number of pitches and how many households these can support is carefully considered.
- 3.5 There are a range of issues that need to be considered when reviewing site and pitch characteristics and their potential implications for future pitch and site requirements. These are now summarised.

1. Site and pitch size

- 3.6 There are no definitive parameters for site or pitch sizes. Although now withdrawn, previous Design Guidance (CLG 2008) states in paragraph 4.4 '*Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take into account the size of the site and the needs and demographics of the families resident on them*'. Paragraph 4.47 states '*to ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately*'. Paragraph 7.12 states '*as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area*'. Paragraph 4.13 states '*smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle*'
- 3.7 Overall, through site observation, it can be noted that the quality of sites, size of pitches and proximity of caravans on pitches can vary dramatically.

2. Households on pitches

- 3.8 A pitch may accommodate more than one family unit, for instance it could include a family, older children who have formed their own household and other family members. This could lead to potential overcrowding of a pitch and households living on pitches should be asked if they consider their pitch to be overcrowded as part of the GTAA.
- 3.9 Pitches sometimes become intensified or sub-divided once planning applications have been approved. These sub-divisions may be tolerated by Councils. Often pitches become subdivided to provide space for newly-forming households, particularly from family members.

3. Occupancy restrictions

- 3.10 Private sites owned by private individuals may restrict occupancy to close family/friends. This limits opportunity for others to move onto the site but this restrictive occupancy may provide for emerging needs. However, all authorised sites, irrespective of occupancy conditions, meet the current and future needs of the residents and are therefore part of the supply of Traveller pitches in the District.

Response

- 3.11 For each site, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches (and sub-divisions) on sites, together with how this may relate to the number of families living on sites. Capacity and layout of sites should be identified through site observation (directly or indirectly through googlemaps or similar), planning history and local knowledge of planning, enforcement and liaison officers.

4. Updated site and pitch information

Malvern Hills

- 4.1 Table 4.1 summarises the updated site and pitch information for Malvern Hills and shows: the total pitches as reported in the 2014 GTAA (with a February 2014 base date); any adjustments to that figure based on the 2016 site observation to the number of pitches that would have been extant in February 2014; an updated total occupied pitches using 2016 site observation data relating to sites which would have existed in 2014; and an updated total number of vacant pitches on sites which would have existed in 2014. More detailed information is presented in Table 8.1. This indicates that the total number of authorised pitches in 2014 should have been 21 rather than 22 as reported in the GTAA, the difference being the Monksfield Farm site which was occupied by a non-Gypsy household. The tolerated pitch reported in the 2014 GTAA was also occupied by a non-Gypsy household.
- 4.2 Since the 2014 GTAA, 2 additional permanent private pitches have been authorised and a lapsed planning consent on an undeveloped / vacant pitch has been refused planning permission. Temporary planning permission on the site at Bastonford has also expired.
- 4.3 Regarding families on the Baughton site granted temporary planning permission for five years in April 2016, it is suggested that these six households will constitute a need for pitches once the temporary permission has expired.

Table 4.1 Summary of pitch data for Malvern Hills

Type of Site	Total pitches 2014 GTAA (at Feb 2014)	Total revised number of pitches as at Feb 2014 (Based on 2016 site appraisals)	2014 GTAA Updated Occupied pitches (based on 2016 site appraisals)	2014 GTAA Updated Vacant pitches (based on 2016 site appraisals)
Council	5	5	5	0
Private Permanent	15	14	12	2
Private Temporary	2	2	2*	0
Private Unauthorised*	0	0	0	0
Total	22	21	19	2

*Note at the time of the 2014 GTAA two private pitches at Bastonford were authorised with temporary planning permission. Temporary planning permission lapsed in March 2015 and the pitches have subsequently been unauthorised.

Worcester

- 4.4 There is one Council site in Worcester. A site visit confirmed that there are 20 pitches on this site and all are occupied.

Wychavon

- 4.5 Table 4.2 summarises the updated site and pitch information for Wychavon and shows: the total pitches as reported in the 2014 GTAA (with a February 2014 base date); any adjustments to that figure based on the 2016 site observation to the number of pitches that would have been extant in February 2014; an updated total occupied pitches using 2016 site observation data relating to sites which would have existed in 2014; and an updated total number of vacant pitches on sites which would have existed in 2014.
- 4.6 More detailed information is presented in Table 8.3. Excluding 14 unoccupied pitches at the Cleeve Prior sites (see paragraph 6.3 below), this indicates that the total number of permanent authorised pitches in 2014 should have been 106 rather than 99 as reported in the GTAA. This is due to a combination of an underestimate of the number of pitches on some sites and to the exclusion of Hill and Moor residential caravan park which was occupied by non-gypsy households. The number of temporary authorised pitches has been reduced from 6 to 1, because two sites at Cropthorne (for 5 pitches between them) were classed as temporary sites but had permanent consent by 2014 and should have therefore been classed as permanent at the time of the GTAA. The number of unauthorised but tolerated pitches increases by 1 and the number of private unauthorised also increases by 1.
- 4.7 The issue of Cleeve Prior sites warrants particular attention. Cleeve Prior sites comprise a series of private and Council pitches. In 2014, there were an estimated 29 pitches (8 managed by the County Council and 21 private pitches). This has been revised to 28 pitches (8 County managed and 20 private pitches) following site visits and information received in 2016. Of these 28 only 14 are counted in the calculation in this addendum because of the difficulties of the site and the known unlikelihood of the vacant pitches being re-occupied. In summary, 5 pitches are counted on the County Council site as 5 were occupied in 2014/15 and 9 pitches are counted on the private sites; no vacancies have been taken into account but those households living on Cleeve Prior at the time of the 2014 GTAA have been included in the figures. In the longer term, it is understood that the emerging (but as yet unexamined) Cleeve Prior neighbourhood plan is proposing a potential redevelopment of the sites and this may result in a need for additional pitches in the future.

Table 4.2 Summary of pitch data for Wychavon

Type of site	Total pitches 2014 GTAA (at Feb 2014)	Total revised number of pitches as at Feb 2014 (Based on 2016 site appraisals)	2014 GTAA Updated Occupied pitches (based on 2016 site appraisals)	2014 GTAA Updated Vacant pitches (based on 2016 site appraisals)
Council	69*	69	69	0
Private - Authorised Permanent	99**	106	95	11
Private - Authorised Temporary	6	1	1	0
Private - Unauthorised but tolerated	5	6	6	0
Private - Unauthorised	6	7	7	0
Cleeve Prior – 3 Council pitches and 11 Private Authorised pitches no longer occupied	14	0	0	0
TOTAL	199	189	178	11
*the 2014 reported 72 Council pitches but 3 are no longer occupied at Cleeve Prior **the 2014 GTAA reported 110 private authorised but 11 are no longer occupied at Cleeve Prior				
Total Authorised (excluding unoccupied pitches at Cleeve Prior)	168	175	164	11
Total Temporary Authorised	6	1	1	0
Total not authorised	11	13	13	0
Total	185	189	178	11

4.8 Since the 2014 GTAA, 23 additional permanent private pitches have been granted planning consent.

5. Turnover on pitches

- 5.1 Across England, the 2013/14 English Housing Survey reported that 11.3% of all households move each year. An analysis of 1,732 Gypsy and Traveller household surveys carried out by arc4 reveals that annually 14.3% of households move to a new 'home base' each year. This is marginally higher than the national mobility rate but demonstrates the degree of mobility amongst the Gypsy and Traveller population and ability to move to alternative pitches.
- 5.2 Having established that an element of turnover is expected on pitches across the study area, there are a series of potential turnover rates which can be considered in the needs analysis. These include:
- turnover based on public site management records, data for each district or a combined South Worcestershire figure;
 - turnover based on the length of residence of respondents to the household survey for each district or a combined South Worcestershire figure; and
 - the national turnover rate of 14.3%.
- 5.3 The Inspector for the South Worcestershire Development Plan (SWDP) accepted the turnover rates for Worcester and Wychavon (11.0% and 6.8% respectively) based on turnover of all pitches in the previous five years. The annual pitch turnover in Malvern Hills (18.3%), however, was considerably higher than in other Worcestershire Districts and it was considered that the high turnover rate may not be sustained over the next five years. The SWDP Inspector recommended that the turnover rate to be adopted in the GTAA for Malvern Hills be based on site management information on the public site but applied to all sites in the District. The suggested turnover rate for Malvern Hills was 60% over 5 years (equivalent to 12% per annum). Although this was based on 7 years' data, the SWDP Inspector did not suggest adjusting it down to a 5 year equivalent rate given the higher turnover rates on private Gypsy and Traveller sites evidenced in the GTAA table 5.28, which stand in a similar ratio of approximately 7:5 turnover on Council-owned sites. Nevertheless, to ensure transparency and robustness the Addendum does propose adjusting the 7 year data down to a 5 year equivalent rate as indicated in table 7.1.
- 5.4 Given that the SWDP Inspector carefully considered the issue of turnover, it is considered that it would be appropriate to use his judgements as a basis for determining turnover rates to inform the GTAA addendum. Although the Inspector only recommended changes to the Malvern Hills turnover figure, for consistency with the approach recommended in Malvern Hills, and to enable regular monitoring of turnover when annually updating the supply of pitches against locally-set targets, it is proposed that annual turnover rates be based on turnover in the previous 7 years on County managed sites. This approach would be consistent with DCLG Guidance.
- 5.5 The annual turnover rates on County Council sites by District are therefore as follows:

Table 7.1 Turnover rate analysis

District	No. household Moves	Pitches	% turnover 7 yrs	Annual turnover rate
Wychavon (excluding Cleeve Prior)	33	67	49.0	7.0
Malvern Hills	3	5	60.0	8.6
Worcester	23	20	115.0	16.4
South Worcestershire Total	59	92	64.1	9.1

Based on site records February 2008 to February 2015

- 5.6 The Inspector at the Baughton appeal³ suggested 20% turnover over 5 years in Malvern Hills District, equivalent to an annual turnover rate of 4% each year. The suggestion was based on movement on a small 5 pitch site in the 5 years to February 2014. This does illustrate the sensitivities associated with calculating turnover on a small site and, on balance, in this context it is more appropriate to consider data over the longer-term; and the rate of 8.6% for Malvern Hills is closer to the South Worcestershire rate of 9.1% which is based on a larger range of pitches across the area.
- 5.7 Note that in the calculation of pitch need, turnover is applied to occupied permanent authorised pitches.

³ Appeal decision APP/J1860/C/14/2223436 Land to the west of the M5 at Baughton, Earls Croome, Worcestershire WR8 9DX

6. Updating pitch need analysis

Malvern Hills

- 6.1 Taking into account the changes in pitch data, Table 8.1 updates the pitch need analysis for Malvern Hills. This indicates a net shortfall of 6 pitches over the 5 year period 2014/15 to 2018/19.

Table 8.1 Malvern Hills Gypsy and Traveller Pitch requirements 2014/15 to 2018/19

GYPSY AND TRAVELLER			
			Malvern Hills
		1a. On LA Site	5
		1b. On Housing Association Site	0
		1c. On Private Site - Authorised	12
		1d. On Private Site - Temporary Authorised	2
		1e. Unauthorised	0
		1f. Unauthorised tolerated	0
1	Total households living on pitches	1g. Total (1a to 1f)	19
2	Current households in bricks and mortar accommodation (baseline information only)	2a. TOTAL	32
		Currently on sites	
		3a. To another pitch/same site	1
		3b. To another site in local authority area	0
		3c. From site to Bricks and Mortar	2
		3d. To a site/B&M outside study area	1
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA	4
		3f. Planning to move to another B&M property	2
3	Existing households planning to move in next 5 years	3g. TOTAL Net impact (3a+3b-3c-3d+3e)	2
		4a. Currently on site and planning to live on current site	7
		4b. Currently on sites and planning to live on another site in LA	4
		4c. Currently on site and planning to live on site outside the study area	
		4d. Currently in B&M planning to move to a site in LA	
		4e. Currently in B&M and moving to B&M (no net impact)	4
		4f. Currently on Site and moving to B&M (no net impact)	0
4	Emerging households (5 years)	4g. TOTAL (4a+4b+4c+4d)	11
5	Total Need	1g+3g+4g	32
SUPPLY			
		6a Current authorised pitches (on LA, HA and Private sites)	17
		6b Current vacancies on authorised pitches	2
6	Current supply of authorised pitches	6c. Total current authorised supply (6a+6b)	19
7	Summary of need and supply excluding turnover	7a. Need - supply (5-6c)	13
8	Turnover on authorised sites	8a. Turnover on pitches which will provide for residents moving within or having a connection with the LA area	7
9	Total supply of pitches (5 yrs) including turnover	9a. Current authorised pitch provision, vacant pitches and turnover (6c + 8a)	26
RECONCILING NEED AND SUPPLY			
10	Total need for pitches	5 years (from 5)	32
11	Total supply of authorised pitches	5 years (from 9a)	26
5yr Authorised Pitch Shortfall (2014/15 to 2018/19)			6

Worcester

- 6.2 Taking into account there were no changes in pitch data but changes to turnover data, Table 8.2 updates the pitch need analysis for Worcester City. This indicates sufficient supply of pitches over the 5 year period 2014/15 to 2018/19.

Table 6.2 Worcester Gypsy and Traveller Pitch requirements 2014/15 to 2018/19

GYPSY AND TRAVELLER			
			Worcester
1	Total households living on pitches	1a. On LA Site	20
		1b. On Housing Association Site	0
		1c. On Private Site - Authorised	0
		1d. On Private Site - Temporary Authorised	0
		1e. Unauthorised	0
		1f. Unauthorised tolerated	0
		1g. Total (1a to 1f)	20
2	Current households in bricks and mortar accommodation (baseline information only)	2a. TOTAL	2
3	Existing households planning to move in next 5 years	Currently on sites	
		3a. To another pitch/same site	1
		3b. To another site in local authority area	0
		3c. From site to Bricks and Mortar	0
		3d. To a site/B&M outside study area	0
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA	1
3		3f. Planning to move to another B&M property	0
		3g. TOTAL Net impact (3a+3b-3c-3d+3e)	2
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site	8
		4b. Currently on sites and planning to live on another site in LA	1
		4c. Currently on site and planning to live on site outside the study area	0
		4d. Currently in B&M planning to move to a site in LA	0
		4e. Currently in B&M and moving to B&M (no net impact)	0
		4f. Currently on Site and moving to B&M (no net impact)	0
		4g. TOTAL (4a+4b+4c+4d)	9
5	Total Need	1g+3g+4g	31
SUPPLY			
6	Current supply of authorised pitches	6a Current authorised pitches (on LA, HA and Private sites)	20
		6b Current vacancies on authorised pitches	0
		6c. Total current authorised supply (6a+6b)	20
7	Summary of need and supply excluding turnover	7a. Need - supply (5-6c)	11
8	Turnover on authorised sites	8a. Turnover on pitches which will provide for residents moving within or having a connection with the LA area	16
9	Total supply of pitches (5 yrs) including turnover	9a. Current authorised pitch provision,vacant pitches and turnover (6c + 8a)	36
RECONCILING NEED AND SUPPLY			
10	Total need for pitches	5 years (from 5)	31
11	Total supply of authorised pitches	5 years (from 9a)	36
5yr Authorised Pitch Shortfall (2014/15 to 2018/19)			-5

Wychavon

- 6.3 Taking into account the changes in pitch data, Table 8.3 updates the pitch need analysis for Wychavon. This indicates a net shortfall of 33 pitches over the 5 year period 2014/15 to 2018/19.

Table 6.3 Wychavon Gypsy and Traveller Pitch requirements 2014/15 to 2018/19

GYPSY AND TRAVELLER			
			Wychavon
1	Total households living on pitches	1a. On LA Site	69
		1b. On Housing Association Site	0
		1c. On Private Site - Authorised	95
		1d. On Private Site - Temporary Authorised	1
		1e. Unauthorised	7
		1f. Unauthorised tolerated	6
		1g. Total (1a to 1f)	178
2	Current households in bricks and mortar accommodation (baseline information only)	2a. TOTAL	11
3	Existing households planning to move in next 5 years	Currently on sites	
		3a. To another pitch/same site	6
		3b. To another site in local authority area	17
		3c. From site to Bricks and Mortar	2
		3d. To a site/B&M outside study area	1
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA	2
4	Emerging households (5 years)	3f. Planning to move to another B&M property	1
		3h. TOTAL Net impact (3a+3b-3c-3d+3e+3f)	23
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site	33
		4b. Currently on sites and planning to live on another site in LA	29
		4c. Currently on site and planning to live on site outside the study area	1
		4d. Currently in B&M planning to move to a site in LA	1
		4e. Currently in B&M and moving to B&M (no net impact)	2
		4f. Currently on Site and moving to B&M (no net impact)	0
		4g. TOTAL (4a+4b+4c+4d)	64
5	Total Need	1g+3h+4g	265
SUPPLY			
6	Current supply of authorised pitches	6a Current occupied authorised pitches (on LA, HA and Private sites)	164
		6b Current vacancies on authorised pitches	11
		6c. Total current authorised supply (6a+6b)	175
7	Summary of need and supply excluding turnover	7a. Need - supply (5-6c)	90
8	Turnover on authorised sites	8a. Turnover on pitches which will provide for residents moving within or having a connection with the LA area	57
9	Total supply of pitches (5 yrs) including turnover	9a. Current authorised pitch provision, vacant pitches and turnover (6c + 8a)	232
RECONCILING NEED AND SUPPLY			
10	Total need for pitches	5 years (from 5)	265
11	Total supply of authorised pitches	5 years (from 9a)	232
5yr Authorised Pitch Shortfall (2014/15 to 2018/19)			33

7. Potential new pitches

- 7.1 The need for additional pitches may not necessarily always require the identification of new sites. Based on observations on site visits there may be opportunities to intensify the number of pitches on some existing sites in Malvern Hills and Wychavon. Whether additional pitches can be provided on sites will depend on a host of factors including: interest of the land owner, safe access, whether the site is affected by flooding, impact on neighbouring uses etc. Until there has been consideration of relevant factors it is not possible to say with any certainty if there is potential for site intensification.

8. Implication of the new definition of Gypsies and Travellers

- 8.1 The updated Planning Policy for Traveller Sites (PPTS) August 2015 defines Gypsies and Travellers as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily⁴, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.”⁵

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

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

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.”⁶*

- 8.3 This means that for planning-related purposes the definition of Gypsy and Traveller has been changed so that it excludes those who have permanently ceased travelling.
- 8.4 The Government has also indicated that it will seek to amend primary legislation to clarify the duties of local authorities to plan for the housing needs of their residents.
- 8.5 It is understood that legal challenges to these points of clarification have been launched. In the absence of the outcome of these challenges, it remains appropriate to consider the needs of Gypsies and Travellers on the basis of their cultural need.

⁴ The 2012 definition was updated in the 2015 PPTS from ‘ceased to travel temporarily or permanently’ to ‘ceased to travel temporarily’

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

⁶ DCLG Planning policy for traveller sites August 2015 Annex 1, para 2

9. Concluding comments

- 9.1 This Addendum has revised the 2014 Worcestershire GTAA for the South Worcestershire Districts of Malvern Hills, Worcester City and Wychavon. Site visits and an analysis of Council planning data were carried out to update information on pitch provision across sites at the time of the GTAA.
- 9.2 The Addendum also considers whether there are any implications arising from the new definition of Gypsies and Travellers relating to the assessment of need.

Baseline pitch provision

- 9.3 For Malvern Hills, the total number of permanent authorised pitches in 2014 was 19 (one less than presented in the 2014 GTAA). Of these, 5 were pitches on the County Council site, and 14 were on private permanent authorised sites. In addition, there were 2 pitches on a private temporary site. Since the GTAA was published, planning consent has been granted for a further 2 permanent pitches on a private authorised site and 6 pitches on a private temporary site⁷.
- 9.4 For Worcester City, the total number of pitches has remained unchanged at 20.
- 9.5 For Wychavon, the total number of authorised permanent pitches in 2014 has changed following site visits and further analysis of Council data from 182 to a total of 175 pitches (106 on private authorised and 69 on Council sites). In addition, there was 1 pitch on a private temporary authorised site, 6 on unauthorised tolerated sites and 7 on private unauthorised sites. As explained in paragraph 6.3, only the occupied pitches have been taken into account at Cleeve Prior because of the slim chance of the vacant pitches ever being re-occupied. The addendum report therefore takes account of those households living on the 14 pitches but does not assume any current vacant pitches will become re-occupied.
- 9.6 The addendum report has also considered the relationship between sites, pitches and households. Through site observation and review of existing planning decisions and other relevant Council officer knowledge, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches (and sub-divisions) on sites, together with how this may relate to the number of family units living on sites.
- 9.7 All authorised sites, irrespective of occupancy conditions, meet the current and future needs of the residents and are therefore part of the supply of Traveller pitches in each District.

⁷ In net terms there has been 1 additional permanent pitch and 4 additional temporary pitches. The consent for 2 pitches at Fieldview is offset by the loss of 1 pitch at Bransford. The 6 temporary pitches at Baughton offset the loss of 2 temporary pitches at Bastonford.

Turnover on sites

- 9.8 The principle of including turnover has been accepted as a valid methodological approach in assessment guidance and also in recent inquiries including the 2015 South Worcestershire Development Plan examination. It is therefore accepted that pitch turnover on managed sites can be used to inform needs assessments.
- 9.9 Having established that an element of turnover is expected on pitches across the study area, turnover rates were established for each District and used to inform the needs assessment modelling. Annual turnover rates used were 8.6% (Malvern Hills), 16.4% (Worcester) and 7.0% (Wychavon) and applied to all permanent occupied authorised pitches.
- 9.10 In the longer-term (beyond the first five years) it is recognised that turnover rates may change. The 2014 GTAA therefore did not apply turnover rates to periods beyond 2019/20. It is considered that updated pitch turnover on managed sites would provide an appropriate basis for establishing turnover rates in future periods.

Updated needs analysis

- 9.11 Having taken account of revisions to baseline pitches and turnover, pitch need has been recalculated and the revised 5 year pitch requirement for each District, for the period 2014/15 to 2018/19, is as follows:
- Malvern Hills shortfall of 6 pitches;
 - Worcester City sufficient capacity ; and
 - Wychavon shortfall of 33 pitches.
- 9.12 This analysis does not take into account new pitches which have been granted planning consent or developed since the GTAA was published in February 2014 nor potential pitches which can be developed through the intensification of existing sites.

New definition of Gypsies and Travellers

- 9.13 Planning Policy for Traveller Sites (PPTS) August 2015 has updated the definition of Gypsies and Travellers to include a clarification for the purposes of planning policy which considers the extent to which Gypsies and Travellers have a nomadic habit of life. The 2014 GTAA was based on interviewing households who were culturally Gypsies and Travellers. Until the outcome of legal challenges to the revised definition are known, it remains appropriate to base the needs analysis on this wider cultural need.

Malvern Hills - Baughton

- 9.14 This is a site of 6 pitches with temporary planning permission which was first occupied after the 2014 GTAA had been completed. It is recommended that the need for 6 pitches is considered by the Council once the temporary planning permission has expired or when the GTAA is updated (whichever is sooner).

This means that the need from this site is part of longer-term need after the period 2014/15 to 2018/19.

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