

## **SOUTH WORCESTERSHIRE DEVELOPMENT PLAN EXAMINATION**

### **Inspector's interim findings on the need for and supply of permanent pitches for Gypsies and Travellers in the five years 2014/15 to 2018/19, as calculated in the *Worcestershire Gypsy and Traveller Accommodation Assessment (November 2014)***

1. These interim findings are provided to assist the South Worcestershire Councils in preparing Main Modifications to the South Worcestershire Development Plan [SWDP] for public consultation. The findings deal with the assessment of need for and supply of permanent pitches for Gypsies and Travellers in the five years 2014/15 to 2018/19, as summarised in Table 6.1 of the *Worcestershire Gypsy and Traveller Accommodation Assessment (November 2014)*<sup>1</sup> [GTAA]. I have no comments to make on any other aspect of the GTAA. Unless otherwise stated, line references below are to the numbered lines in Table 6.1, and pitch and household figures are aggregate figures for the three South Worcestershire authority areas.
2. In reaching these findings, I have carefully considered all the relevant written submissions, including representations on both the Proposed Submission version of the SWDP and the Proposed Modifications published for consultation in October and November 2014, the parties' Matter J hearing statements and the discussion at the Matter J hearing session, and the Councils' responses to my subsequent written questions<sup>2</sup>. My findings are based on the evidence before me in the SWDP examination and are specific to the GTAA insofar as it applies to the South Worcestershire authorities.
3. I find that most aspects of the methodology employed in preparing the GTAA are sound. However, I consider that two important adjustments need to be made to the calculation of need and supply as summarised in Table 6.1. Both concern the issue of turnover, which was a contested element of the methodology. Put simply, turnover is an allowance made in the GTAA to reflect the fact that a proportion of gypsy households are likely to move from their existing pitch during the five-year period. The fact that turnover occurs is clear from the GTAA itself (see the summary figures at Table 6.2), and is independently verified by the data on movements at Council-owned gypsy and traveller sites, provided in response to my further questions<sup>3</sup>.
4. Without allowing for turnover, the net current<sup>4</sup> supply of pitches equates to the total current authorised supply of pitches (231 – see Line 7). However,

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<sup>1</sup> Examination document CD258a.

<sup>2</sup> Examination documents EX/903a-j.

<sup>3</sup> Examination document EX/903i.

<sup>4</sup> By "current" I mean as at the base date of Table 6.1 (2014).

the turnover allowance for the next five years<sup>5</sup> of 90 pitches (Line 8) effectively increases the five-year supply to 321 (Line 9). This addition of 90 does not represent the physical provision of 90 more pitches. Instead it is based on evidence indicating that 90 existing households will move off their existing pitches in the course of the next five years. It is assumed that each move will release the pitch for occupation by another household<sup>6</sup>. That is a reasonable assumption in itself, but it is essential that it is related properly to the calculation of need, if accurate conclusions are to be reached.

5. According to Table 6.1, need is derived from three basic components: total households currently living on pitches (Line 1), existing households planning to move in the next five years (Line 3), and emerging households likely to form over the next five years (Line 4). I consider that an adjustment is needed to the calculations in Line 3, for the following reasons.
6. There are 241 existing households living on pitches (Line 1g). 6 of these are currently planning to move into bricks and mortar accommodation, or to move outside the area (Lines 3c & 3d), while 7 are planning a move from bricks and mortar to a pitch (Line 3e). This gives a net addition of one household to the need figure, as correctly recognised in Line 3g.
7. However, a further 25 existing households have stated that they are planning to move to another pitch in the area in the next five years – 1 each in Malvern Hills [MH] and Worcester City [WC] and 23 in Wychavon [WY] (Lines 3a & 3b). Those moves are not factored into the total net impact on need at Line 3g. But just as propensity to move (turnover) is considered to add to supply, even though it does not physically increase the number of pitches – see paragraph 4 above – it must logically add to need in a similar way. In other words, some of the existing pitches released into the supply by turnover will be occupied by existing households moving to a different pitch, as well as by emerging households and those moving from bricks and mortar.
8. **Thus I recommend** that the figures at Lines 3a & 3b should be factored into the total net impact on need at Line 3g, increasing the relevant Line 3g figures to 2 in both MH and WC, and 22 in WY. This in turn produces a commensurate increase in total need (Lines 5 and 10) to 35 in MH, 31 in WC, and 284 in WY.

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<sup>5</sup> By “the next five years”, I mean 2014/15 to 2018/19 as per Table 6.1.

<sup>6</sup> The basis for the figure of 90 pitches is found in Table 6.2, which gives turnover rates on authorised pitches for the past five years, based on household surveys. In Table 6.1 these rates are carried forward to calculate turnover for the next five years.

9. The other adjustment which I consider necessary is to the turnover allowance for MH in Line 8. Like the other turnover figures on that line, it is derived from the data summarised in Table 6.2, which produce the five-year turnover rates in the penultimate line of that table. It can be seen that the MH turnover rate of 91% is very much an outlier among the five Worcestershire authorities for which data is presented – rates in the other four authorities range from 26% to 55%, while the county-wide rate is 38%. While I do not question the previous five-year data from which the MH rate has been derived, I consider it would be unsafe to assume that such an unusually high turnover rate would be sustained over the next five years.
10. **I therefore recommend** that the assumed MH turnover rate for the next five years should be reduced to 60%. This recommended figure is derived from the most recent data on turnover at the only Council-owned site in MH (Malvern Meadows), as shown in EX/903i. 60% is the turnover rate for the past seven years, but I do not recommend adjusting it down to a five-year equivalent rate. This is because of the higher turnover rates on private gypsy and traveller sites evidenced in GTAA Table 5.28, which stand in a similar ratio of approximately 7:5 to turnover on Council-owned sites<sup>7</sup>.
11. 60% would therefore represent a realistic five-year rate for MH across both Council- and privately-owned sites. At 60%, the MH figure would still be the highest rate among the Worcestershire authorities, but would provide a sound basis for forward planning, unlike the outlier rate of 91% used in the GTAA.
12. The effect of replacing the 91% MH turnover rate in Table 6.1 with a 60% turnover rate would be to reduce the turnover component of supply from 17 to 11 (Line 8), and to reduce the total supply figure in MH from 37 to 31 (Lines 9 and 11).

## Summary

13. My recommended adjustments to the Table 6.1 of the GTAA are:
  - 1) Alter the “total net impact” figures in Line 3g of Table 6.1 to 2 in both Malvern Hills and Worcester City, and 22 in Wychavon<sup>8</sup>. The total need figures in Lines 5 and 10 will thereby rise to 35, 31 and 284 respectively.

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<sup>7</sup> The penultimate line of Table 5.28 shows that, across the county, 48% of households on Council-owned sites and 28% on privately-owned sites had lived on their existing pitch for five years or more, giving five-year turnover rates of 52% and 72% respectively.

<sup>8</sup> The Line 3g formula will thus become  $(3a + 3b + 3e) - (3c + 3d)$ .

- 2) Alter the turnover component of supply in Malvern Hills in Line 8 of Table 6.1 from 17 to 11. The total supply figure in Lines 9 and 11 will thereby reduce from 37 to 31.
14. The overall impact of these changes will be to increase the five-year pitch shortfall (last line of Table 6.1) from -3 to 4 in Malvern Hills, from -1 to 0 in Worcester City, and from 9 to 31 in Wychavon.
15. These shortfall figures should be regarded as minimum requirements for the five-year period in question, in view of what is said in the second sentence of paragraph 6.22 of the GTAA.

Roger Clews, Inspector

20 July 2015