Fylde Coast Authorities Gypsy and Traveller and Travelling Showpeople Accommodation Assessment

Final Report
September 2014
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<td>Overall Needs for Each Authority</td>
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<td>Fylde</td>
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1. Executive Summary

Background

1.1 Opinion Research Services (ORS) were commissioned by the three Fylde Coast local authorities of Blackpool, Fylde and Wyre (the Fylde Coast sub-region) to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.

1.2 The principle purpose of the Assessment is to inform the development of local plan policy in the Fylde Coast sub-region relating to Gypsies, Travellers and Travelling Showpeople in a manner consistent with government planning advice in the form of the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. Accordingly, it provides an up-to-date understanding of the likely permanent and transit accommodation needs of Gypsies, Travellers and Travelling Showpeople within the sub-region as a whole, and for each of the three participating authorities.

1.3 The Fylde Coast sub-region encompasses the area covered by the Unitary Authority of Blackpool Council and the two-tier area covered by Lancashire County Council and the district councils of Fylde and Wyre. The area stretches from the Ribble Estuary in the south to Morecambe Bay in the north and the Forest of Bowland moorlands in the east. The area covers 384 sq. km and is home to 327,400 residents.

1.4 The three Authorities, plus Lancashire County Council, continue to work together on a range of strategic issues, including the accommodation needs of Gypsies, Travellers and Travelling Showpeople, framed by an agreed Memorandum of Understanding.

1.5 The methodology that was used to complete the study has been developed by ORS over the past 10 years and has been regularly updated in line with changes to planning policy and other changes introduced by the Government. In summary this included the following key stages of research and analysis:

» Stage 1: Desk-Based Research;
» Stage 2: Stakeholder Engagement;
» Stage 3: Working Collaboratively with Local Planning Authorities;
» Stage 4: Survey of Travelling Communities;
» Stage 5: Bricks and Mortar Households;
» Stage 6: Current and Future Pitch/Plot Requirements; and
» Stage 7: Conclusions.
## Gypsy and Traveller Site Summary

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Blackpool</strong></td>
<td></td>
</tr>
<tr>
<td>Local Authority Sites</td>
<td>26 (+ 3 transit)</td>
</tr>
<tr>
<td>Private Sites with Permanent Permission</td>
<td>18</td>
</tr>
<tr>
<td>Private Sites with Temporary Permission</td>
<td>0</td>
</tr>
<tr>
<td>Tolerated Sites – Long-term without planning permission</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES</strong></td>
<td>44</td>
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<tr>
<td><strong>Fylde</strong></td>
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<tr>
<td>Local Authority Sites</td>
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<tr>
<td>Private Sites with Permanent Permission</td>
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</tr>
<tr>
<td>Private Sites with Temporary Permission</td>
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</tr>
<tr>
<td>Tolerated Sites – Long-term without planning permission</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments</td>
<td>15</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES</strong></td>
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<tr>
<td><strong>Wyre</strong></td>
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</tr>
<tr>
<td>Local Authority Sites</td>
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</tr>
<tr>
<td>Private Sites with Permanent Permission</td>
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</tr>
<tr>
<td>Private Sites with Temporary Permission</td>
<td>0</td>
</tr>
<tr>
<td>Tolerated Sites – Long-term without planning permission</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments (recent, but not current)</td>
<td>8</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES</strong></td>
<td>8</td>
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## Travelling Showpeople Yard Summary

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Blackpool</strong></td>
<td></td>
</tr>
<tr>
<td>Local Authority Yards</td>
<td>0</td>
</tr>
<tr>
<td>Private Yards with Permanent Permission</td>
<td>0</td>
</tr>
<tr>
<td>Private Yards with Temporary Permission</td>
<td>0</td>
</tr>
<tr>
<td>Tolerated Yards – Long-term without planning permission</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments</td>
<td>2</td>
</tr>
<tr>
<td><strong>TOTAL PLOTS</strong></td>
<td>2</td>
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</tbody>
</table>
Opinion Research Services

Fylde Coast Authorities Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

September 2014

<table>
<thead>
<tr>
<th>Fylde</th>
<th>Number of Plots</th>
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<tr>
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<td>2</td>
</tr>
<tr>
<td>Private Yards with Temporary Permission</td>
<td>0</td>
</tr>
<tr>
<td>Tolerated Yards – Long-term without planning permission</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL PLOTS</strong></td>
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</table>

<table>
<thead>
<tr>
<th>Wyre</th>
<th>Number of Plots</th>
</tr>
</thead>
<tbody>
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<td>Local Authority Yards</td>
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</tr>
<tr>
<td>Private Yards with Temporary Permission</td>
<td>10</td>
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<td>Tolerated Yards – Long-term without planning permission</td>
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<tr>
<td>Unauthorised Developments</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL PLOTS</strong></td>
<td><strong>10</strong></td>
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**Key Findings & Conclusions**

**Gypsy and Traveller Future Residential Pitch Provision**

Based upon the evidence that was collected during the course of the study the estimated extra residential pitch provision that is required for Gypsies and Travellers in the Fylde Coast over the next 17 years is 81 pitches to address local needs. The table below shows the requirements by 5 year time periods until 2031.

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>2014-2019</th>
<th>2019-2024</th>
<th>2024-2029</th>
<th>2029-2031</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>21</td>
<td>7</td>
<td>7</td>
<td>3</td>
<td>38</td>
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<tr>
<td>Fylde</td>
<td>17</td>
<td>3</td>
<td>4</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td>Wyre</td>
<td>12</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>50</strong></td>
<td><strong>12</strong></td>
<td><strong>13</strong></td>
<td><strong>6</strong></td>
<td><strong>81</strong></td>
</tr>
</tbody>
</table>

*To be consistent with local plan timescales across the Fylde Coast sub-region a year is taken as 1st April; to 31st March.

**Travelling Showpeople Future Plot Provision**

The estimated extra residential plot provision that is required for Travelling Showpeople in the Fylde Coast over the next 17 years is 14 plots to address local needs. The table below shows the requirements by 5 year time periods until 2031.
Transit/Emergency Stopping Site Provision

1.8 A public transit site both provides a place for households in transit to an area and also a mechanism for greater enforcement action by local authorities against inappropriate unauthorised encampments. Currently, Blackpool has 3 pitches on a public transit site, but there is no transit site in the county of Lancashire. The site in Blackpool cannot be used to redirect Travellers from elsewhere in Lancashire.

1.9 Evidence from the CLG Annual Caravan Count and from Lancashire County Council indicates that a significant number of unauthorised encampments occur each year in Lancashire which a transit site may help to address. We consider that households visiting Wyre and Fylde do need access to a transit site, but this would not necessarily have to be located in these authorities. We would note that transit sites are an area where cross boundary working could prove to be particularly effective and that the transit needs of Gypsy and Travellers visiting Lancashire are an issue which should be considered at a more strategic level. For clarity we consider that the transit site in Blackpool is addressing the needs of Blackpool, while at least one transit site is required in Lancashire County Council area, but not necessarily in Fylde or Wyre.

Stakeholder Engagement

1.10 No pressing cross border issues were reported by officers from neighbouring areas.

1.11 It is recommended that the Fylde Coast Authorities use appropriate resources to help develop closer working relationships, for instance, the three areas should work together to collate data on unauthorised encampments.

1.12 It is understood, that a Lancashire-wide Gypsy and Traveller Forum has been set up by Lancashire officers and has met once. We recommend this continues and:

» Shares the methodologies and findings from their GTAAs;
» Establishes a greater understanding of travelling patterns;
» Regularly exchanges information;
» Shares best practice on site management;
» Considers the distribution of need across the region;
» Explores the idea of developing a network of emergency stopping places across the Lancashire County Council area and the Unitary authorities of Blackpool and Blackburn with Darwen; and
» Develops a common protocol for managing unauthorised encampments.
2. Introduction

The Survey

2.1 Opinion Research Services (ORS) were commissioned by the three Fylde Coast local authorities of Blackpool, Fylde and Wyre (the Fylde Coast sub-region) to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.

2.2 The principle purpose of the Assessment is to inform the development of local plan policy in the Fylde Coast sub-region relating to Gypsies, Travellers and Travelling Showpeople in a manner consistent with government planning advice in the form of the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. Accordingly, it provides an up-to-date understanding of the likely permanent and transit accommodation needs of Gypsies, Travellers and Travelling Showpeople within the sub-region as a whole, and for each of the three participating authorities.

2.3 The study also provides an evidence base to enable the authorities to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004.

2.4 Planning Policy for Traveller Sites states that local planning authorities should identify a supply of deliverable sites sufficient to provide five years-worth of sites, identify a supply of specific developable sites or broad locations for years 6-10 and where possible years 11-15.

2.5 All three authorities are currently progressing with their local plans, albeit to different timescales. In order to fit with the differing local plan end dates, assist with long term planning and provide each authority with appropriate information to meet the above guidance, the pitch and plot requirements detailed in this report are based on the following time periods. Each year is defined as being formed by the period 1st April to the following 31st March (in effect mid-year to mid-year):

   - 2014-2019 (five years)
   - 2019-2024 (five years)
   - 2024-2029 (five years)
   - 2029-2031 (two years)

2.6 Although the main focus of local plan policy is likely to be on sites for a degree of permanent or settled occupancy, this Assessment also considers whether or not any of the three local authorities need to plan for the provision of transit sites or emergency stopping places.

2.7 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New Travellers, Traveller and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA).
This document is the main report and summarises the key findings of the study and identifies any implications for future planning policy decisions across the study area.

The Study Area

The Fylde Coast sub-region (Figure 1) encompasses the area covered by the Unitary Authority of Blackpool Council and the two-tier area covered by Lancashire County Council and the district councils of Fylde and Wyre. The area stretches from the Ribble Estuary in the south to Morecambe Bay in the north and the Forest of Bowland moorlands in the east. The area covers 384 sq. km and is home to 327,400 residents.

The three Authorities, plus Lancashire County Council, continue to work together on a range of strategic issues, including the accommodation needs of Gypsies, Travellers and Travelling Showpeople, framed by an agreed Memorandum of Understanding.

Figure 1
Map of the Fylde Coast Authorities study area

Definitions

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 dependants’ 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, Department for Communities and Local Government (CLG), March 2012).
2.12 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.

2.13 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010.

2.14 Alongside Gypsies and Travellers, a further group to be considered is Travelling Showpeople. 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 dependant’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 and Travelling Showpeople

2.15 Decision-making for policy concerning Gypsies, 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, Travellers and Travelling Showpeople:

» Planning Policy for Traveller Sites 2012.
» 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.
» Anti-social Behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour).
» 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 this element of government guidance).
» Housing Act 1996 (in respect of homelessness).
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, from the Caravans Act 1968, to provide appropriate accommodation for Gypsies and Travellers. However, at this time Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.

For site provision, the previous Labour Government guidance focused on increasing site provision for Gypsies and Travellers and Travelling Showpeople and encouraged Local Authorities to have a more inclusive approach to Gypsies and Travellers and Travelling Showpeople within their Housing Needs Assessment. The Housing Act 2004 Section 225 requires 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.

Local Authorities were encouraged rather than compelled to provide new Gypsy and Traveller sites by central Government. Circular 1/2006 ‘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.

The Coalition Government announced that the previous Government’s guidance contained in Planning for Gypsy and Traveller Caravan Sites (Circular 01/2006) and Planning for Travelling Showpeople (Circular 04/2007) was to be repealed, along with the Regional Spatial Strategies (RSS) 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.

More recently additional changes have been set out in a letter from the Planning Minister in March 2014. This clarified the Government’s position on household formation rates and stated:

‘Following the recent consolidation of planning guidance we will be seeking to consult on updating and streamlining the remaining elements of traveller planning practice guidance and also on strengthening traveller planning policy. We will ensure that any new guidance supports councils to accurately assess their needs and would remove ambiguous references to the 3% growth rate figure, which, I stress, is only illustrative. This would, once published, have the effect of cancelling the last Administration’s guidance.’

‘I can confirm that the annual growth rate figure of 3% does not represent national planning policy. The previous Administration’s guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority’s own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure, though in some cases we are aware that inspectors have, in considering the level of unmet local need when demonstrating specific traveller appeals, used the 3% growth rate figure in the absence of a local authority’s own up-to-date assessment of need.’
2.21 The Council should note that CLG launched a consultation on new policy guidance for Gypsies and Travellers in September 2014. This included changes relating to developments in the Green Belt and areas with large unauthorised sites and encampments. The consultation also includes a potential change to the definition of a Gypsy, Traveller or Travelling Showperson and if this is introduced it could have a significant impact for local planning authorities. Whilst these proposals are only at a consultation stage at present the Council do need to aware of potential changes that may be introduced, and the implications of these changes for future planning purposes.

Planning Policy for Traveller Sites

2.22 The document ‘Planning Policy for Traveller Sites’ which came into force in March 2012 sets out the direction of government policy. Planning Policy for Traveller Sites is closely linked to the National Planning Policy Framework, but is to be viewed as a separate document. ORS have sought clarification of this relationship from CLG and have been told that Planning Policy for Traveller Sites should be viewed as effectively a separate document with little overlap. In particular, ORS queried paragraphs 47 and 159 of the National Planning Policy Framework.

2.23 Paragraph 47 states that local authorities should:

Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

2.24 While paragraph 159 states local authorities should:

Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

2.25 We were informed by CLG that there was no requirement to implement these paragraphs in Gypsy and Traveller Accommodation Assessments because they are not in Planning Policy for Traveller Sites. Similarly a Planning Inspector at a hearing in Wokingham has ruled that the requirement to have a buffer for land supply contained in paragraph 47 of the National Planning Policy Framework does not apply to Gypsy and Traveller sites because it is not in Planning Policy for Traveller Sites. Therefore, it is clear that Planning Policy for Traveller Sites is best considered largely in isolation from the wider requirements set out in the National Planning Policy Framework.

2.26 Among other objectives, the aims of the policy in respect of Traveller sites are (Planning Policy for Traveller Sites Pages 1-2):

» 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 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 the local environment.

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.

In producing their Local Plan local planning authorities should:

Identify and annually update 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 6-10 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 strategic 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.

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 Pages 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.

Tackling Inequalities for Gypsy and Traveller Communities

2.30 In April 2012 the Government issued a further document relating to Gypsies and Travellers titled ‘Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers’ (CLG April 2012).

2.31 The aforementioned 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 £60 million 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

2.32 The Coalition Government policies also involved financial incentives for new affordable pitch provision in the form of the New Homes Bonus. For all new pitches on Local Authority or Registered Provider-owned and managed sites, Local Authorities received 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 equated to around £8,000 per pitch.

2.33 Direct grant funding was 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 £16.3 million in 26 schemes across the country to provide 88 new or additional pitches and 179 improved pitches. The HCA welcomed bids from Local Authorities, Housing Associations and Traveller community groups working with Registered Providers.

2.34 The HCA has now confirmed allocations for all of its £60 million 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. For the HCA 2015-18 Affordable Housing Programme there is no ring-fenced funding, but proposals for Gypsy and Traveller pitches will be considered within the programme. The table below shows the current allocation outside of London.
2.35 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. Local authorities and Registered Providers are advised to continue to work closely with HCA area teams to develop their proposals should any further funding become available as a result of some funded schemes not proceeding.

**Figure 2 - HCA Grant Allocations for New Pitches (Source: HCA)**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Amount of money</th>
<th>Number of new pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td>East and South East</td>
<td>£6,218,381</td>
<td>91</td>
</tr>
<tr>
<td>Midlands</td>
<td>£14,126,576</td>
<td>216</td>
</tr>
<tr>
<td>North East, Yorkshire and The Humber</td>
<td>£15,328,694</td>
<td>375</td>
</tr>
<tr>
<td>North West</td>
<td>£3,850,763</td>
<td>108</td>
</tr>
<tr>
<td>South and South West</td>
<td>£16,713,954</td>
<td>309</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£56,238,368</strong></td>
<td><strong>1,099</strong></td>
</tr>
</tbody>
</table>

2.36 It is accepted that individual local authorities are likely to find it very difficult financially to provide the new sites that are identified in this study and other sources of funding should be considered, for example S106 funding that has been identified to fund the provision of new pitches in other local authorities, working closely with Registered Providers, and encouraging the development or expansion of other private sites or yards.
3. Methodology

3.1 This section sets out the methodology we have followed to deliver the outputs for this study. Over the past 10 years ORS has developed a methodology which provides the required outputs from a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. This was updated in 2012 in light of Planning Policy for Traveller Sites. The methodology was updated again to accommodate recent changes set out by the Planning Minister in March 2014 with particular reference to new household formation rates.

3.2 The stages below provide a summary of the process undertaken by ORS, with more information on each stage provided in the appropriate sections of the report.

Stage 1: Desk-Based Research

3.3 At the outset of the project ORS sought to understand the background to the Gypsy, Traveller and Travelling Showpeople population in the study area. This comprised the collation of a range of important secondary data from the following available sources:

- Census data.
- Location of all known authorised sites and yards, together with planning conditions.
- Site management records and waiting lists (applicable to the public Chapel Road site in Blackpool only).
- Biannual Traveller Caravan Counts.
- Records of any unauthorised sites and encampments.
- Relevant information from planning, housing, education, community safety, environmental health and health services.
- Information on planning applications and appeals – including those that have recently been refused and those that are currently awaiting determination.
- Information on any other current enforcement actions.
- Existing GTAA’s and other relevant local studies.
- Existing policy, guidance and best practice.

3.4 This data has been used to inform the stakeholder interviews and fieldwork and has also been analysed in conjunction with the outcomes of the other elements of the study to allow ORS to complete a thorough review of the needs of travelling communities in the study area.

Stage 2: Stakeholder Engagement

3.5 This study includes stakeholder engagement with council officers from the Fylde Coast authorities and neighbouring councils, council members and other stakeholders such as local service providers and a representative of the Showman’s guild of Great Britain. Usually ORS would have sought to speak with
representatives of or leading figures within the Gypsy and Travellers community, however, there are no known representatives present in the study areas.

3.6 The aim of this engagement was to understand the current situation of Gypsies, Travellers and Travelling Showpeople in the study area, to identify households living outside of known existing sites and to discuss Duty to Cooperate issues. A consultation was also carried out with Parish and Town Councils in Wyre and Fylde (there are no Parish and Town Councils in Blackpool).

3.7 The stakeholder interviews covered the following key topics:

» What dealings or relationships people have with Gypsies and Travellers;
» Experiences of any particular issues in relation to Gypsies and Travellers;
» Awareness of any Gypsy and Traveller sites either with or without planning permission and whether this varies over the course of a year;
» Any trends people may be experiencing with regard to Gypsies and Travellers (e.g. increase in privately owned sites or temporary sites);
» What attracts Gypsies & Travellers to an area;
» Identification of any seasonal fluctuations that may occur;
» Awareness of any occurrences of temporary stopping by travellers;
» Identifying the relationship between the settled and travelling communities;
» Awareness of any travellers currently residing in bricks and mortar accommodation;
» Awareness of any cross boundary issues; and
» Any other comments on the gypsy and traveller community in the study area.

Stage 3: Working Collaboratively with Local Planning Authorities

3.8 Given the duty to cooperate interviews were also be conducted with officers from neighbouring authorities and any other authorities where we identified a direct link with the needs of the study area – for example wider travelling routes etc. These interviews will ensure that the GTAA addresses wider issues that may impact on the outcomes of the study. These stakeholders were identified as part of the desk-based review and in conjunction with officers from the Council. Interviews were conducted with officers from the following authorities and covered the same broad issues as the local stakeholder interviews:

» Blackburn with Darwen Council;
» Burnley Borough Council;
» Chorley Borough Council;
» Hyndburn Borough Council;
» Lancashire County Council;
» Lancaster City Council;
» Pendle Borough Council;
» Preston City Council;
Following the completion of the write-up on the outcomes of the interviews with neighbouring authorities the draft chapter was shared with those who took part in the interviews to confirm it was an accurate reflection of the discussions that took place. This resulted in a small number of minor amendments.

**Stage 4: Survey of Travelling Communities**

Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and encampments in the study area. This work identified 1 public site in Blackpool, a total of 6 private sites with permanent planning permission, no sites with temporary planning permission and 2 unauthorised encampments – none of which are tolerated. Two authorised private Travelling Showpeople yards were also identified, together with 2 unauthorised yards which are not tolerated.

ORS sought to undertake a full study of all pitches and plots as part of our approach to undertaking the GTAA as our experience suggests that a sample based approach very often leads to an under-estimate of current and future needs which can be the subject of challenge at subsequent appeals and examinations. All pitches (including those on current unauthorised sites that were present at the time of the study) were visited by experienced ORS researchers who conducted face-to-face interviews with residents on as many pitches as possible to determine their current demographic characteristics, whether they have any current or likely future accommodation needs and how these may be addressed, and whether there are any concealed households. The interview was based around a questionnaire that was agreed with the three Council’s. 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. This approach also allowed the interviewers to identify information about the sites and pitches that could help support any future work on possible site expansion by undertaking an overall assessment of each pitch/site.

Where it was not possible to undertake an interview, our researchers captured as much information as possible about the site from site management or from residents on adjacent sites or pitches.

We sought to undertake a census of Gypsy and Travellers and Travelling Showpeople households across the Fylde Coast sub-region in January 2014. A total of 35 Gypsy and Traveller interviews were completed from a potential 63 households in the area.

In addition where it was not possible to complete a full interview with a number of households on private sites in Blackpool, interviewers sought to gather basic information on site demographics, any future needs and issues around concealed households and over-crowding. A further 11 interviews were carried out with Travelling Showpeople from 14 possible households during this period.

Some studies promoted as good practice by other organisations have penetration rates of between 10% and 45%. A penetration rate of 55% for full interviews was achieved in this study, plus additional information that was gathered from sites where it was not possible to complete a full interview. Therefore we feel this is a robust response to contribute towards this study.
Stage 5: Bricks and Mortar Households

3.16 In our experience many Planning Inspectors and Appellants question the accuracy of GTAA assessments in relation to those Gypsies and Travellers living in bricks and mortar accommodation who may wish to move on to a site. ORS feel that the only practical approach is to go to disproportionate lengths to identify as many households in bricks and mortar who may want to take part in an interview to determine their future accommodation needs, including a wish to move to a permanent pitch in the study area.

3.17 Contacts in bricks and mortar were sought through a wide range of sources including speaking with people living on existing sites to identify any friends or family living in bricks and mortar who may wish to move to a site, intelligence from the Council and other local stakeholders including Councillors. In addition adverts were placed in World’s Fair, and on the Friends and Families of Travellers Community Noticeboard. Importantly, ORS also worked collaboratively with the Ethnic Minority & Gypsy, Roma and Traveller Achievement Service based within Lancashire County Council.

3.18 Through our approach we endeavoured to do everything within our means to publicise that a local study was being undertaken in order to give all households living in bricks and mortar who may wish to move on to a site the opportunity to make their views known to us.

3.19 As a rule we do not extrapolate the findings from our fieldwork with Gypsies and Travellers living in bricks and mortar households up to the estimated Gypsy and Traveller bricks and mortar population as a whole, and work on the assumption that those wishing to move will make their views known to us based on the wide range of publicity that we put in place.

Stage 6: Current and Future Pitch/Plot Requirements

3.20 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 from Gypsy, Traveller and Travelling Showpeople Accommodation Assessments conducted across the country.

3.21 To identify need PPTS requires an assessment for current and future pitch requirements, but does not provide a methodology for this. 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 population. The key factors in each of these elements are set out below and will be set out in more detail in the relevant chapter of this report:

Supply of Pitches

- Current vacant pitches;
- Pitches currently with planning consent due to be developed within the study period;
- Pitches vacated by people moving to housing;
- Pitches vacated by people moving from the study area; and
- Pitches vacated due to the dissolution of households.
Current Need

3.22 Total current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space available in the study area, is made up of the following. It is important to address issues of double counting:

» Households on unauthorised sites for which planning permission is not expected;
» Concealed households;
» Households in B&M wishing to move to sites; and
» Households on waiting lists for public sites.

Future Need

3.23 Total future need is the sum of the following three components:

» Households living on sites with temporary planning permissions;
» New household formation; and
» In-migration.

3.24 Household formation rates are often the subject of challenge at appeals or examinations. While many GTAA studies undertaken by other companies have continued to use a net growth figure of 3%, we agree with the position now being taken by CLG and firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on precedent. This is set out in more detail later in Chapter 6 of this report.

3.25 All of these components of supply and need are presented in an easy to understand tables which identify the overall net requirements for current and future accommodation for both Gypsies and Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. 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 for the study period.

Stage 7: Conclusions

3.26 This stage of the study will draw together the evidence from Stages 1 to 6 to provide an overall summary of the requirements for Gypsies, Travellers and Travelling Showpeople in the Fylde Coast local authorities.
4. Background Information for Gypsy and Traveller and Travelling Showpeople Sites and Population

Background

4.1 One of the main considerations of this study is the provision of pitches and sites for Gypsies and Travellers and Travelling Showpeople. 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. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required across the three authorities.

4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly-provided residential site, which is provided by the Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a site preference list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing).

4.3 The alternative to public residential sites is private residential sites for Gypsies, 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.

4.4 The Gypsy, Traveller and Travelling Showpeople population also occupies other forms of site due to its 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 days or weeks to a period of months. An alternative to transit sites is an emergency stopping place. This type of site also has restrictions on the length of time someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. Nationally, a number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.

4.5 Further options for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the land owner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.
UK Census of Population 2011

The UK Census of Population 2011 included Gypsy and Travellers as a distinct ethnic category for the first time. Across the whole of England, around 55,000 people identified themselves as being Gypsies and Travellers, with a population of 348 Gypsy and Traveller persons in the whole of the Fylde Coast sub-region covering 127 households. The figure of 348 persons and 127 households is likely to be an under-estimate of the total population. This is based on evidence from other studies that ORS have been involved in where it was found that some Gypsies and Travellers had not declared their ethnic status or completed the Census at all. Previous estimates for the total size of the Gypsy and Traveller population in England ranged from 120,000 to 300,000 so a population of 55,000 is well below these figures, but the scale of the under enumeration is difficult to estimate. It is also worth noting that the Census does not count Travelling Showpeople as a separate ethnic grouping.

Figure 3
Number of Gypsy and Travellers Persons by Local Authority (Source: UK Census of Population 2011)

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of Persons</th>
<th>Number of Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>237</td>
<td>94</td>
</tr>
<tr>
<td>Fylde</td>
<td>15</td>
<td>6</td>
</tr>
<tr>
<td>Wyre</td>
<td>96</td>
<td>27</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>348</strong></td>
<td><strong>127</strong></td>
</tr>
</tbody>
</table>

It is possible to analyse the results in more detail at local authority level. A map for Blackpool which has the largest resident Gypsy and Traveller population can be found below. This shows that the population is relatively evenly distributed across Lower Super Output Area’s (LOSAs) with very little concentration in any one area except the south east area which also contains the current public site at Chapel Road site. This analysis also suggests a widely dispersed bricks and mortar population of Gypsies and Travellers in Blackpool.
The maps below show the distribution of usually resident Gypsy and Travellers that were identified in the 2011 Census in Fylde and Wyre. This shows a concentration of Gypsies and Travellers in a small number of LSOA’s in Fylde although the highest concentration south-west of Kirkham does not relate to any known sites in the area. The highest concentrations of Gypsies and Travellers identified in the Census living in Wyre are concentrated towards the north and west of the area with the highest numbers being in the north east around Forton and in the south west around Carleton and Poulton-Le-Fylde.
Caravan Count

4.9 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.

4.10 The charts overleaf show the numbers of caravans counted on authorised and unauthorised sites in each of the study authorities for the last eight years. The counts may involve the same populations moving around or entirely new groups of Gypsies and Travellers moving into or through the area. 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 at a point in time and are not used in any modelling of future pitch requirements in this study (although the counts do provide a useful indication regarding the potential need for transit sites or emergency stopping places). We would also note that the data is reported as it was submitted to CLG.

4.11 In Fylde 31 caravans were recorded as being on private sites without planning permission in July 2013. There were also 12 caravans on sites with permanent planning permission. The setting up of the unauthorised site at Angels Lane, Hardhorn is shown by the growth in unauthorised caravans from 2009 onwards.
For Wyre 7 caravans were recorded as being on sites with temporary planning permission in January 2012 and 2013. These are the Travelling Showpeople at Kepple Lane, Garstang who should have been counted in the separate Travelling Showpeople, not Gypsy and Traveller, counts. The site at Blueberry Park, Preesall is reflected in the unauthorised caravans from 2009 onwards.

In Blackpool, 68 caravans were recorded as being on unauthorised sites without permanent planning permission in July 2013. This appears to be a mistake in how the form was completed and again reflects the need to treat caravan counts with caution.
Sites

4.14 As of January 2014, the supply of official permanent accommodation for Gypsies and Travellers is largely focused in Blackpool (Appendix A) which has one publically owned site (Chapel Road) as well as a small number of private sites. There is no public provision in either Fylde or Wyre, with the supply in the former focused on a small number of private sites. The main Travelling Showpeople site is situated in Wyre at Garstang (Appendix B).

4.15 At the genesis of the Assessment, there were two significant unauthorised Gypsy and Traveller developments as follows:

Figure 7
Unauthorised Gypsy and Traveller Developments within the Fylde Coast sub-region

<table>
<thead>
<tr>
<th>Authority</th>
<th>Site Name</th>
<th>From (month/year)</th>
<th>Gypsies, Travellers or Travelling Showpeople</th>
<th>No. Pitches/Yards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fylde</td>
<td>Angels Lane, Hardhorn</td>
<td>November 2009</td>
<td>Gypsies</td>
<td>15 pitches (15+ households)</td>
</tr>
<tr>
<td>Wyre</td>
<td>Blueberry Park, Preesall</td>
<td>November 2009</td>
<td>Gypsies/Travellers</td>
<td>8 pitches</td>
</tr>
</tbody>
</table>

4.16 The site at Blueberry Park has constituted an unauthorised development consisting of eight pitches occupied by Travellers since November 2009. There have been two planning applications to regularise the development, both refused on grounds that include flood risk and impact on the character of the landscape. Joint planning and enforcement appeals subsequent to the first refusal (and related enforcement notice) failed and the decisions of the local authority supported. However, under the appeal against the enforcement notice the Inspector allowed a period of occupancy to allow the Travellers to locate an alternative site. This period ended in November 2013 at which point the Council were granted an injunction to prevent the Travellers re-occupying the site. It is understood that the Travellers in fact left the site in May 2013 to travel and have not occupied the site since. It has been indicated through the course of this Assessment that some of the Blueberry Park occupants may be occupying an unauthorised development in Fylde (see below), although this has not been confirmed by the Travellers themselves. ORS
have sought to contact the Travellers themselves but have not been able to. Their planning agent confirmed that their appeal process cannot be taken any further.

4.17 The Fylde unauthorised development known as Angel Lane consists of 15 pitches and was first occupied in November 2009. A planning application to regularise the development was made and rejected by Fylde Council and a joint planning appeal for permission and against enforcement notices was heard in 2010. The Secretary of State recovered the decision in 2011 because the proposals raise important or novel issues of development control, and/or legal difficulties. The Secretary of State agreed with the planning inspector and the appeals against the enforcement notice and for planning permission were all dismissed. This decision was challenged at the Court of Appeal, with the Court finding that the Secretary of State had acted lawfully. The site occupants were also told they could not appeal to the Supreme Court. The Court of Appeal decision gave the Travellers until February 2014 to vacate the site.

4.18 We note that the Fylde Coast sub-region contains a number of residential park home sites. During the on-site survey it became clear – due to the presence of cultural identifiers such as the layout of the sites, the presence of machinery on site, the presence of both mobile and static caravans on site - that some of the sites in Fylde may, at least in part, be occupied by Gypsies and Travellers. ORS wrote to site owners on sites where there may be some element of Gypsy and Traveller occupancy, explaining the nature of the study and seeking engagement and study input. However, we received no indication from any households on these sites that they were Gypsies or Travellers, or that there is a desire to take part in the study. In the light of a lack of any clear empirical evidence that the sites contacted do contain Gypsy and Traveller households, and a lack of any evidence that any Gypsies and Travellers on such sites wish to reside on Gypsy and Traveller designated sites, the Assessment has not accounted for any need arising from this source. Even if there are Gypsies and Travellers living on these sites the fact that they did not want to be identified may mean that they and any future households arising are happy to continue to live as they are rather than on specific Gypsy and Traveller sites identified in the local plan or which come forward through the submission of a planning application.

4.19 The map below shows the known Gypsy and Traveller sites in the Fylde Coast area. Blackpool contains 8 sites, but due to the proximity of some the identifying markers overlap only 5 blocks can be seen.
Figure 8
Map showing the location of the Gypsy and Traveller sites in the study area
Travelling Showpeople Households in the Fylde Coast Authorities

4.20 The population of Travelling Showpeople is typically smaller than that of Gypsies and Traveller and planning records also tend to be more disparate. Working with the respective Fylde Coast authorities, we were able to identify that there are the following number of active Travelling Showpeople yards in the study area:

» Blackpool – two yards (two plots – one in each);
» Fylde – one yard (two plots); and
» Wyre – one yard (ten plots).

4.21 Therefore, in total, the study area currently contains four Travelling Showpeople yards containing 14 plots.
5. Stakeholder Consultation - Findings

Introduction

5.1 To be consistent with the methodology used in other studies that ORS have undertaken, and in order to provide thoughtful consideration of the issues raised by a wide range of key stakeholders, the Fylde Coast Authorities commissioned ORS to undertake a stakeholder engagement programme. Qualitative research of this type attempts to gain a deeper understanding of the issues and is used to supplement the information gathered during visits to Gypsy, Traveller and Travelling Showpeople sites.

5.2 The Local Authorities that ORS have worked with to date have opted for the following methodology:
   » Semi-structured telephone interviews; and
   » A Parish and Town Council postal survey.

5.3 In addition to this, the Fylde Coast Authorities were keen to hold a focus group with Council officers and Elected Members in each area. It was felt that this approach would enable stakeholders to meet and debate important key issues.

5.4 ORS also placed an advert on the Friends and Families of Travellers Facebook page, Travellers Times website and in the World’s Fair publication to notify the community that the study was taking place and invited Travellers who live in bricks and mortar to take part in a confidential interview.

5.5 It is important to note that in the absence of a significant and long standing Gypsy and Traveller community in the Fylde and Wyre Boroughs, and, despite the existence of a well-established Gypsy and Traveller community in Blackpool, there is no one cohesive Gypsy and Traveller representative group with which the Council or ORS has been able to engage. However, it was possible to engage with the Showmen’s Guild through the occupants of the Kepple Lane site in Garstang, Wyre.

Telephone Interviews and Parish and Town Council Postal Survey

5.6 To enable ORS to identify key stakeholders, Fylde Coast Authorities were asked to identify contacts which included Housing Providers, Gypsy and Traveller and Travelling Showpeople representatives, support services, Elected Members (with sites in their Wards and Portfolio Holders) and relevant Council officers from Housing, Planning, Environment, Community Safety, Education, Community Development and neighbouring areas.

5.7 ORS reviewed this list for consistency with other studies to ensure it was comprehensive and fair. Each stakeholder received an email outlining the study aims, objectives and timetable, which was followed up with a telephone call to arrange a suitable time to undertake the interview.

5.8 Similar to the guidance given to other Local Authorities ORS have worked with, the project lead was advised to notify both Gypsy Councils that the GTAA was being carried out and invited them to take part and make a contribution to the study. Similarly to the experience of other Local Authorities neither Gypsy Council responded to the invitation.
Overall, ORS achieved 33 stakeholder interviews which included:

» Seventeen Council officers (senior and operational):
  
  Four representing the study areas
  
  Three representing Lancashire County Council:
    
    Education (prevention and inclusion)
    
    Highways
    
    County Councillor
  
  Ten representing neighbouring areas

» Three wider stakeholders

  A representative of Lancashire Constabulary
  
  An Education Officer (Blackpool)
  
  Public Health Practitioner (Blackpool)

» Two Registered Providers:

  Blackpool Coastal Housing
  
  Regenda Neighbourhood Management

» Nine Ward Members (a total of 17 were contacted but three were unable to take part due to illness):

  Wyre – five
  
  Fylde - three
  
  Blackpool – one

» The Warden of the public site at Blackpool.

» A member of the Showman’s Guild of Great Britain.

ORS also sent a postal survey to fifteen Parish/Town Councillors across Fylde and Wyre. Blackpool is a unitary authority and does not have any Parish and Town Councils. A total of nine responses were received:

  Fylde – five; and
  
  Wyre - four (three of which were from Preesall Town Council).

The number and range of stakeholders interviewed is viewed to be satisfactory and consistent with similar GTAA’s ORS have completed.

**Focus Groups**

Helpfully, the project lead in each of the three study areas took responsibility for arranging the focus groups. Council officers and Elected Members (portfolio holders) from each of the study areas were invited to attend the group.
In January, ORS facilitated four groups (Blackpool held two separate groups, one for Elected Members and the other for Senior Council officers). The meetings were held and attended as follows:

- **Blackpool**
  - Group one – five participants (three senior Elected Members and two senior Council officers).
  - Group two – six participants (Senior Council officers)

- **Fylde**
  - Ten participants (including three senior Elected Members and seven senior Council officers)

- **Wyre**
  - Nine participants (including senior Elected Members and a senior Council officer).

The three project leads attended the focus group in their respective area and it is worth noting that they found it very useful in developing their understanding of the wider issues. Based on the positive feedback, ORS have suggested this method to other Local Authorities who are looking to commission a GTAA.

### Identifying Travellers in Bricks and Mortar and Mobile Home Accommodation

One aim of the stakeholder engagement process was to identify contacts for Gypsies, Travellers and Travelling Showpeople who live in bricks and mortar. All stakeholders who took part in this study were asked if they could assist ORS with providing contacts within these communities. One stakeholder agreed to make contact with housed Travellers on behalf of ORS. Detail of the outcomes can be found later in this report.

### Discussion Agenda

The format for the interviews and focus groups covered the following themes:

- Trends and history;
- Meeting the current and future needs of the Gypsy and Traveller community;
- Meeting the current and future needs of the Travelling Showpeople community;
- Awareness of Travellers living in bricks and mortar accommodation and on mobile home sites;
- Short-term roadside encampments and requirement for a transit site;
- Meeting future accommodation needs;
- Engaging the communities;
- Cross boundary issues and the Duty to Cooperate;
- Future priorities; and
- Any further issues and next steps.
**Reporting Engagement with Stakeholders**

5.17 This section of the report represents a balanced summary of the views expressed by the wide range of stakeholders that took part in the engagement programme. Due to issues surrounding data protection and, in order to protect the anonymity of those who took part, it was agreed at the time of the interviews that verbatim comments would not be used. In all cases comments made during the discussions reflect the views of the individuals concerned, rather than the official policy of their respective Council. Comments made by stakeholders should not necessarily be taken as factually correct.

**Blackpool Council – Key Findings**

**Accommodation for Gypsies and Travellers**

5.18 Stakeholders confirmed the existence of six authorised sites across Blackpool, one of these being a council owned 26 pitched site which is managed by Blackpool Coastal Housing:

» Overall, the public site is believed to be working well and felt it to be meeting the needs of the residents who live there;

» When asked about the condition of the site, stakeholders referred to the £800,000 investment in 2008 which included the building of a community centre which is currently used on an informal basis with no planned on-going events;

» The investment has nearly been recouped through rental revenue and additional funds will be released to undertake further work;

» Stakeholders referred to a number of agencies who have attempted to engage with the residents on the public site. For instance, public health were said to have tried to work with the community and organise an arts project and other groups (including adult learning and literacy, health, beauty courses, smoking cessation and blood pressure monitoring) have also been offered and declined by the residents. When talking to lead members of the community it is said that they are not interested in having anyone on site or undertaking any of the activities that have been suggested. A stakeholder referred to a ‘well advertised’ event that was held in the community centre and was organised collaboratively by a number of agencies, however, only one person turned up; and

» A few stakeholders referred to one private site which they believed to be in a poor state. Although recognising that refurbishing private sites would be costly, it was felt that it could be worth exploring possible funding schemes to improve the conditions of the privately owned sites.

**Accommodation for Travelling Showpeople**

» There are two small unauthorised sites in the area and stakeholders reported regular contact with the Showpeople. Both were surveyed during this study; and

» Stakeholders reported that the Showman’s Guild have not contacted the Council to enquire about provision for Travelling Showpeople.
Short-term Roadside Encampments

» Stakeholders were aware that a small number of roadside encampments usually occur during the summer period and believed that these Travellers are en route to the Appleby Horse Fair in Cumbria or on holiday.

» Popular stopping places are reported to be:
  - Grange Park; and
  - Lawson Field.

» In general, encampments are tolerated by the police unless they are particularly problematic, cause anti-social behaviour or leave rubbish. The Council has, however, taken action to prevent encampments occurring during the Christmas period. It was felt that this action was warranted because of the disruption caused to traffic, pedestrians and festive events.

» Elected Members revealed that, when encampments occur, they will receive calls from concerned members of the public and they felt that the settled community are less tolerant of Travellers in transit than they are of the permanent Travelling community.

Meeting Future Accommodation Needs

» As no planning applications have been forthcoming from Travellers living in or outside of Blackpool, stakeholders felt there to be little evidence of in-migration;

» Stakeholders did however, refer to the number of people on the waiting list and the low turnover on the public site, and felt that this may be an indication of the Travelling community’s preference for Council-run accommodation, as opposed to private sites;

» Stakeholders were of the view that the issue of the unauthorised Travelling Showpeople sites needs to be resolved. An officer referred to the Showpeople’s site in Garstang, Wyre as a potential source of demand once the temporary permission on this site expires;

» The majority of stakeholders felt the main priority for Blackpool is to meet the future growth of the existing population and strongly supported the need to do so; and

» Nevertheless, stakeholders felt that it will be difficult to identify available and affordable land to meet the future needs of the community.

Community Cohesion

» Elected Members were not aware of any community tensions between the settled and Traveller community and explained that the Travelling community have been settled in the area for a long time and are ‘accepted’ within the community. Although it was felt that Travellers would rather ‘keep themselves to themselves’, this was not seen to be an issue;

» It was felt, however, that the settled and Traveller communities also need to have a greater understanding of each other’s culture.
Access to Health Services

» Public health had recently completed a health needs assessment which found that the Gypsy and Traveller community:
  
  Were reluctant to self-identify when using health services
  
  Would access emergency services as and when required, as opposed to registering with a GP
  
  Had difficulties accessing dental services, although, this was an issue for the wider population.

» At the time of the study, public health services were concentrating on improving the outcomes for the residents on the public site as they were considered ‘easier to reach’ than residents of private sites; and

» Training staff involved in the delivery of health services (medical and non-medical) on the needs and culture of the Travelling community was considered to be important.

Consultation with the Travelling Community

» Stakeholders stressed the importance of engagement and were of the opinion that consultation with residents on the public site has been sufficient, although some stakeholders suggested that the community do not necessarily want to engage with agencies and are happy to ‘keep themselves to themselves’;

» Engagement with those on the private site is said to be limited to environmental health officers. and

» It was felt that, in the absence of a representative organisation, it is difficult to engage with all members of the Travelling community.

Cross Boundary Issues and the Duty to Cooperate

» Overall, stakeholders emphasised the importance of working with neighbouring areas to meet the needs of the Travelling community;

» Stakeholders referred positively to the Memorandum of Understanding which has been established to ensure that Blackpool, Fylde and Wyre work together on Gypsy and Traveller issues; and

» The joint commissioning of the GTAA was thought to be further progress in demonstrating the Duty to Cooperate. Stakeholders referred positively to a past training event organised by the Planning Advisory Service (PAS) and felt that, in their independent capacity, PAS could facilitate future cross border discussions.
Fylde Borough Council – Key Findings

Accommodation for Gypsies and Travellers

» Stakeholders referred to the site on Bambers Lane and explained that this has been granted permission to double in size from six to 12 pitches;

» A planning application for four pitches on Thames Street, Newton has been “Minded to Approve” by the Council (December 2013) subject to call in by the Secretary of State (note – since the focus group the application has indeed been call-in for determination by the Secretary of State);

» Stakeholders confirmed the existence of one unauthorised development which consists of 15 pitches at Angel Lane (Hardhorn) and is located just 12 metres from the Wyre border and 2km from Blackpool; and

» One stakeholder suggested that although many of the families have been on the site since it was first developed, some of the families have changed.

Bricks and Mortar

» Stakeholders were not aware of any housed Travellers in the area and the majority expressed the view that they wouldn’t expect there to be many because, up until the arrival of the Angel Lane (Hardhorn) group, Travellers haven’t favoured the area; and

» The Housing Advice and Housing Option services were not aware of any Travellers who have used their services.

Accommodation for Travelling Showpeople

» There is one Travelling Showpeople yard in Fylde which stakeholders believe to be under occupied; and

» Stakeholders revealed that Fylde Borough Council has had regular contact with Travelling Showpeople, who although they live outside of the area, have historic ties to the Freckleton area. They are interested in developing a site in the area, however, have so far only suggested inappropriate sites in the greenbelt.

Unauthorised Encampments

» A Parish Council reported intermittent temporary stopping at the Lodge Lane lay-by which occurs throughout the year;

» A Lancashire County Council officer referred to one encampment which reoccurs two-three times yearly on the end of the M55 roundabout on a semi-industrial estate. This is said to cause problems for local businesses;

» Overall, stakeholders were only aware of a small number of unauthorised encampments and did not believe them to cause disruption;
A few stakeholders believed that the Angel Lane site at Hardhorn acts as an informal transit site. Although the numbers on the site can swell at certain times of the year because of this, it is said to have decreased the numbers of roadside encampments; and when they do occur, the police response was considered to be robust.

**Meeting Future Accommodation Needs**

- The majority of stakeholders believed that the Bambers Lane and Thames Street sites are meeting the future needs of the Travelling community;
- The majority of the Elected Members interviewed were of the opinion that residents on the Angel Lane site do not indicate need because they do not have local connections and the site is unsuitable; and
- Stakeholders felt that Fylde Council should help the Travelling Showpeople find an available and suitable piece of land to develop a site.

**Community Cohesion**

- Elected Members, including two Parish councils, referred to alleged anti-social behaviour perpetrated by residents on the Angel Lane site and reported that this is of great concern to local residents of Fylde and, because of its location on the border, Wyre residents also; and
- It was felt that community tensions exist between the Travelling community at Hardhorn and the settled community surrounding the site.

**Health and Education**

- It was felt that, in order to improve health outcomes and raise educational outcomes, officers should work with the communities to build up trust.

**Consultation with the Travelling Community**

- The Borough has consulted with the Gypsy and Traveller residents of Bambers Lane, the applicants of the Thames Street planning application and Travelling Showpeople at Staining;
- The majority of stakeholders reported having difficulty engaging with the residents at the Angel Lane site;
- Undertaking the GTAA work was considered to be working towards more positive engagement with the Travelling population; and
- However, a few stakeholders believed that Fylde Council should engage with both communities in a meaningful proactive way, as opposed to being reactive and supported the idea of a Gypsy Liaison officer.
Cross Border Issues and the Duty to Cooperate

» Most stakeholders believed that the Fylde Coast should be working together to meet the needs identified in this study; and

» It is felt that in the future, cross border discussions need to involve Elected Members, as in the past they have been officer led.

Wyre Borough Council – Key Findings

Accommodation for Gypsies and Travellers

» There has been one unauthorised development in Wyre Borough. The Blueberry Park site at Preesall has been unoccupied for the duration of the study and there is an injunction preventing the residents moving back to the site;

» Overall stakeholders were not aware of the current whereabouts of the previous residents, however, it was suggested that some may have moved onto the Angel Lane (Hardhorn) site;

» Officers and Elected Members expressed concern about particular issues relating to the site:
  - Location in a flood zone; and
  - Site access.

» Elected Members referred to the alleged anti-social behaviour perpetrated by the site residents when they have been present.

Bricks and Mortar

» When asked if there are Travellers living in bricks and mortar, Stakeholders were not aware of any and were of the view that it would be unlikely as, up until the arrival of the Preesall group, Gypsies and Travellers haven’t favoured the area; and

» However, one officer was aware of Travellers who have moved into the area as a result of fleeing from settled accommodation in other areas due to domestic violence. It was felt that these people would not be willing to come forward to take part in the study.

Accommodation for Travelling Showpeople

» There is one Travelling Showperson site on Keple Lane, Garstang which contains ten families; temporary permission would have ran out in May 2014 but has been extended by one year during the course of this study. No alternative site has been found. The site residents are said to be complying with all of the planning conditions;

» Elected Members explained that Travelling Showpeople having been visiting the area for over sixty years and mix well with the community. Officers explained that they have regular contact with three of the Showpeople at the site including contact with the Showman’s Guild;
Considering that the Showpeople were given temporary permission, over the past five years, the Council have been working with the Showpeople at the site to find alternative accommodation for ten families. A number of sites were identified as part of the 2010 Strategic Housing Land Availability Assessment, and this list was made available to the Showpeople. Unfortunately, landowners are said to have been unwilling to sell the land. Sourcing sites that are available and deliverable is considered to be the main barrier to meeting the accommodation needs of Travelling Showpeople. However, they will continue to pursue available sites through a ‘call for sites’; and

The Travelling Showpeople at the site have expressed to the Council their concern about how their future accommodation needs would be met.

Unauthorised Encampments

There have been eleven incidences of unauthorised encampments since 2008. The officer who collated this data explained that some of the recorded eleven encampments could possibly be caused by the same group as the information collected does not necessarily make distinctions between groups. It was felt that this information is crucial to understanding the need for transit provision and the distinction should be identified. Although this was agreed, however, it was noted that this information can be extremely challenging to obtain from those in transit;

When they do occur, an assessment is undertaken and information is gathered. The Council will normally serve them with a notice to quit and will work with police. The process is said to take some two weeks and they will usually leave before the issue goes to court;

Encampments usually occur during the summer months and tend to be located in the Thornton and Cleveleys areas on unenclosed open land. The officer who undertakes the need assessment of those encampments explained that Travellers say they are moving through the area for holiday purposes and when en route to the Appleby horse fair and are not looking for permanent accommodation in the area; and

Officers and Elected Members agreed that it would be useful to have a Fylde Coast database on information relating to encampments that occur across the three areas as it would help to establish a better understanding of the wider Traveller movements.

Meeting Future Accommodation Needs

Officers felt that one of the major barriers to meeting future needs is sourcing developable and available land which is free of constraints and landowners are willing to sell;

Stakeholders stressed that, aside from the Travellers who resided at Preesall, they were not aware of any other members of the Gypsy community who live in the Wyre area;

The majority of stakeholders felt the Borough should prioritise finding an alternative site for the residents of the Travelling Showpeople site at Garstang; and
Stakeholders felt the provision of a transit site was not justified given the small numbers of encampments.

**Health, Education and Community Cohesion**

- Stakeholders felt the Travelling Showpeople to be well integrated and well known within the local community and reported no community tensions; and
- In contrast, there were said to be tensions between the Gypsy community who resided on the Blueberry Park site and the settled community.

**Consultation with the Travelling Community**

- Officers referred to regular contact with the previous residents of the Blueberry Park site;
- As aforementioned, however, consultation with the Traveller community has been limited given the limited history of Travellers residing in the area; and
- As aforementioned, officers felt there has been regular communication with the Travelling Showpeople.

**Cross Border Issues and the Duty to Cooperate**

- Elected Members expressed their concern about the Angel Lane (Hardhorn) Site which, because of its location on the border with Wyre, affects residents in the neighbouring area; and
- Nonetheless, Elected Members felt that Fylde have been trying to manage the situation in a similar way to the approach taken by Wyre to the issue of the site at Preesall (Blueberry Park).

**Regional Stakeholders**

5.19 As stated in ‘Planning Policy for Traveller Sites’, Local Authorities have a Duty to Cooperate (S.110 Localism Act 2011) on strategic planning issues that cross administrative boundaries. In order to explore cross border issues, and to understand the regional context, Council Officers from ten local authorities took part in a telephone interview.

**Neighbouring Local Authorities**

5.20 As shown in the map below, Fylde, Wyre and Blackpool border five local authorities:
ORS spoke to Council officers from:

» Lancaster City Council;
» Preston City Council;
» Ribble Valley Borough Council; and
» West Lancashire Borough Council.

Despite several attempts during the course of the GTAA, no contact was made with a representative of South Ribble Borough Council.

**Lancaster City Council**

ORS completed Lancaster’s GTAA in July 2013 and identified the following sites/pitches:

» One public site with 19 pitches;
» 134 private pitches concentrated in the Heysham, Morecambe and Oxcliffe areas;
» Three pitches with temporary permission;
» Two private transit pitches;
» The officer representing Lancaster felt the City Council has adopted a positive approach toward accommodating Gypsy and Travellers. However, the officer was concerned that some sites/pitches are being used by non-Travellers and explained that this has been
difficult to prevent and ultimately means there has been a reduction in the amount of Traveller accommodation;

» There is said to be a large housed Traveller community, however similar to the experience of other local authorities, the City Council has found it difficult to engage with this group.

» There are currently no Travelling Showpeople’s yards in Lancaster, but there the community has expressed an interest in developing a site in the area;

» Lancaster is said to be popular stopping place for Gypsies and Travellers en route to Appleby Fair and travelling to Ireland via Heysham port;

» Lancaster recently chaired a Lancashire-wide Gypsy and Traveller Accommodation Forum, however the turnout to the group was considered to be poor, despite efforts to publicise the event and engage other authorities;

» Lancaster has held discussions with neighbours including Wyre, South Lakeland and Craven, about Gypsy and Traveller need. These discussions have provided some awareness of the situation with regard to supply and demand in surrounding areas; and

» The officer expressed concern that some local authorities have been reluctant to meet the accommodation needs of their Gypsy and Traveller community.

**Preston City Council**

5.24 In Preston there is one permanent public site with 14 pitches and one temporary private site with five pitches.

» Preston, Chorley and South Ribble completed their GTAA in December 2013. The research identified a shortfall of six pitches for 2013/14 to 2017/18 and a further 11 up to 2028;

» There was no evidence of future need for Travelling Showpeople; and

» The officer was of the view that Preston City Council are working hard to keep in contact with Fylde Coast officers but felt that further work to understand the wider regional movements is required.

**Ribble Valley Borough Council**

5.25 In the Ribble Valley there are two private owned sites (eight and one pitch).

» The GTAA, completed in 2013, found that the extra pitch provision that is required for Gypsies and Travellers in the next 10 years is zero pitches whilst there is a need for two pitches in the period 2023-2028;

» There was no evidence of extra provision being necessary for Travelling Showpeople in the future;

» A small number of unauthorised encampments occur around the time of the Appleby Fair and the A59 was identified as the primary route through the Borough;

» There appears to be a small bricks and mortar population; the 2011 UK Census of Population identified a population of six Gypsy and Traveller persons in Ribble Valley. Although ORS believe this to be an under-estimate of the total population due to some
Gypsies and Travellers not declaring their ethnic status or completing the Census at all, it would seem to indicate an extremely minimal population in bricks and mortar;

» Overall, the officer did not identify any pressing cross boundary issues but they have had some discussions with Wyre regarding their approach to Gypsies and Travellers in their Development Plan; and

» Going forward, the officer felt the Lancashire-wide forum will be a vehicle to share best practice across the region.

West Lancashire Borough Council

5.26 There are a number of unauthorised encampments and no authorised sites in the West Lancashire area. There is one longstanding Travelling Showpeople’s site in the area and there is overcrowding on the site.

» At the time of this study, West Lancashire was undertaking a joint GTAA with Merseyside. An early indication of the findings is that there is a similar level of need as previously known;

» Unauthorised encampments occur on a sporadic basis and are thought to occur because the area is on the main route from Liverpool, en route to and from Appleby and because they are visiting family in the area;

» The officer felt that all the neighbouring areas are meeting need in their own area, or are proposing to do so in the future;

» Although Fylde is a neighbouring area, the officer explained that the area is separated by the River Ribble and, as a result, there aren’t any direct cross border issues and they tend to have more cross border issues and therefore contact with Preston and South Ribble. Nonetheless, the officer expressed some concerns about the Travelling Showpeople site at Garstang and what would be the outcome for neighbouring authorities if Wyre are unable to meet their needs; and

» The officer felt the Lancashire-wide forum will enable authorities across Lancashire to meet the Duty to Cooperate.

Other Local Authorities

5.27 ORS spoke to Council officers from each of the following local planning authority areas:

» Blackburn with Darwen Council;
» Burnley Borough Council;
» Chorley Borough Council;
» Hyndburn Borough Council;
» Lancashire County Council;
» Pendle Borough Council; and
» Rossendale Borough Council.
Blackburn with Darwen Borough Council

5.28 There is one council-run twenty pitched site in the area.

» The Borough have undertaken an internal partial review of the previous Lancashire wide GTAA, which concluded that there is a pitch shortfall of 16 pitches up to 2016 and a further 18 up to 2026;

» The officer was of the view that there has been an unequitable distribution of provision across the Pennine Lancashire area with accommodation for Travellers concentrated in the Blackburn with Darwen and Hyndburn Borough Council areas;

» No cross boundary issues with Fylde were thought to exist and the officer explained that because Blackburn with Darwen and Hyndburn have similar Traveller communities and share other common issues they are more likely to meet with their neighbours and indeed have had several cross-border meetings; and

» The officer felt that the Lancashire-wide Gypsy Forum will be useful in maintaining links with other Lancashire authorities to explore how other authorities are approaching the issue and to develop a consensus across the region on the way forward.

Burnley Borough Council

5.29 There is one unauthorised development (land owned by Gypsies and Travellers but developed without planning permission) within Burnley. It is estimated that this site currently accommodates approximately four pitches/households. The GTAA in 2012 estimated that there were at least 24 households living in bricks and mortar accommodation in Burnley. There is one household living in a trailer in the curtilage of a house in Burnley. There are no yards for Travelling Showpeople in the area.

» The GTAA undertaken in 2012 concluded a need for a further 28 pitches by 2026;
» The area is currently moving forward with their Local Plan and site identification process 
(end of March – September 2014);

» There are said to be occurrences of Unauthorised Encampments which, it was felt, were 
hard to track, particularly across the wider area. It was felt that this could be an issue that 
should be addressed on a Pennine Lancashire basis; and

» There are no cross border issues with the Fylde Coast as the area is not considered to be a 
natural or immediate neighbour and most of the cross boundary work has been with 
Pendle Borough Council with whom they share a Housing Market Area.

**Chorley Borough Council**

5.30 Within Chorley there is one private site with temporary planning permission until July 2015.

» In January 2014 Chorley completed a GTAA which identified a need for five permanent 
Gypsy and Traveller pitches and a Central Lancashire transit traveller need for 15 pitches 
(five in Chorley);

» There was no need for Travelling Showpeople identified; and

» The Local Plan Inspector, however, considered that there may be additional need that had 
not been captured in the aforementioned study and Chorley has been required to 
undertake further work.

**Hyndburn Borough Council**

5.31 Within Hyndburn there is a public site which is owned by Lancashire County Council and managed by 
Hyndburn. There are two sites (one which has gone to an appeal and one which has been referred to 
Secretary of State) which are in the Green Belt. There are a number of private sites in the urban area.

» At the time of this study, Hyndburn Borough was undertaking its own GTAA;

» There have been fewer unauthorised encampments in the past 12-18 months than 
previously. There doesn’t appear to be a demand for transit sites but it was thought that 
this may be because Travellers who visit the area could stay on private sites. There is a 
shared protocol on the management of unauthorised encampments across East 
Lancashire which has been adopted in the last 12 months and is viewed positively as it 
sends a consistent message to Travellers moving around the area;

» Hyndburn have an adopted Core Strategy which sets out to: Protect the existing site in 
Altham for the use of Travelling Showpeople; Protect existing sites which are authorised 
for Gypsy and Traveller use; and to identify and meet future needs. The Strategy also 
refers to the distribution of pitches in the North West being heavily skewed towards a 
small number of local authority areas and states that this is compounded by the 
methodology employed in undertaking Gypsy and Traveller Accommodation Assessments. 
It goes onto to state that accommodation should be more evenly distributed to ensure 
that the housing rights of Gypsy and Traveller communities in the North West are met;

» Several years ago Hyndburn established a Gypsy and Traveller Group which meets 
quartely. The meetings are attended by stakeholders from the Police, Health, and
Lancashire County Council. Sub groups also exist and include a women’s group. The officer explained that the Network allows people to keep informed about what is happening on the ground and allows connections between the Council and the Travelling community; and

» In terms of working with neighbouring authorities, the officer explained that the Borough has a similar housing market and Gypsy and Traveller population to Blackburn with Darwen and, therefore, they are working together. The Fylde Coast does not bound Hyndburn and is not included as part of the Hyndburn Borough GTAA. Nonetheless, the officer felt they would be speaking to the Fylde Coast as part of the Lancashire-wide Gypsy Forum.

Lancashire County Council

» An officer representing Lancashire County Council felt there should be up to ten emergency stopping places for Travellers in transit throughout the Lancashire area (one - two per District).

» Stopping places would have portaloos and skips and would be available for a couple of weeks during the year. This is said be a cheaper alternative to formal transit sites. Old chipping dumps are said to be ideal locations. The major benefit would be if stopping places were provided then the Police would be able to move them on to them from other public land.

Pendle Borough Council

5.32 There are no sites for Gypsies and Travellers or Travelling Showpeople in the Borough.

» The GTAA undertaken in 2012 concluded a need of zero pitches by 2026;

» Pendle have a ‘natural’ relationship with Burnley because they are continuous areas on the M65 corridor and they have very similar housing markets;

» When asked about the Duty to Cooperate across the wider area the officer referred positively to the Regenerate project which has now employed a dedicated Planning officer whose role includes leading on the Gypsy and Traveller issue and will be looking to collate the findings from GTAA’s (Greater Manchester are also looking to do the same). It is felt that this could work towards collating the findings of individual GTAA’s and potentially assess the impact if an individual authority could not provide and to what extent there is any potential in other neighbouring authorities; and

» It was felt that transit movements have been hard to track within the individual GTAA’s and this could be easier achieved by working collectively across the Lancashire region.

Rosendale Borough Council

5.33 There is currently no site provision in the Borough.

» The GTAA undertaken in 2011 found a requirement for five permanent and three transit pitches and the priority for the Borough is to meet the need for permanent
accommodation. In attempting to meet this need the Borough have met with Lancashire County Council and have visited sites in the Hyndburn area;

» Unauthorised Encampments occur when Travellers are travelling from Greater Manchester and the GTAA found a need for three transit pitches. The officer explained that the Borough have been looking at providing a stopover site but noted the difficulties of doing so in terms of choosing a suitable piece of land, the way in which this type of site is provided e.g. whether toilets and water are provided and if it is worth the money to provide this type of site;

» When asked about cross border issues the officer stressed that there is debate surrounding the large amount of accommodation in Hyndburn and the extent to which it is meeting local or wider regional needs; and

» The officer was not aware of any cross border issues with the Fylde Coast and referred to links with Greater Manchester and Southern Lancashire.

Conclusions and Areas of Consideration

5.34 No pressing cross border issues were reported by officers from neighbouring areas.

5.35 It is recommended that the Fylde Coast Authorities use appropriate resources to help develop closer working relationships, for instance, the three areas should work together to collate data on unauthorised encampments.

5.36 It is understood, that a Lancashire-wide Gypsy and Traveller Forum has been set up by Lancashire officers and has met once. We recommend this continues and:

» Shares the methodologies and findings from their GTAAs;

» Establishes a greater understanding of travelling patterns;

» Regularly exchanges information;

» Shares best practice on site management;

» Considers the distribution of need across the region;

» Explores the idea of developing a network of emergency stopping places across the Lancashire County Council area and the Unitary authorities of Blackpool and Blackburn with Darwen; and

» Develops a common protocol for managing unauthorised encampments.
6. Gypsy and Traveller Interviews and Survey Results

Survey of the Gypsy and Traveller Population

6.1 One of the major components of this assessment is a detailed survey of the Gypsy and Traveller population within the Fylde Coast Authorities. This aims to identify current households with housing needs and to assess likely future household formation from within existing households, to help judge the need for future site provision. 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 dependants’ 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).

6.2 Interviews were attempted with every Gypsy and Traveller household in the Fylde Coast Authorities who were present during January 2014. Therefore, the baseline point for the findings of this study is January 2014. Throughout the survey period interviewers worked from 9am to 7pm each day and made repeated visits to each household until a successful interview was concluded.

6.3 In total, full interviews were achieved on-site with 35 households from a potential 63 on-site households. A further 3 households did not take part in the full interview, but confirmed that there was only one household on the site, and 6 households provided basic demographic information. ORS were also contacted by one site owner to confirm that they wished to expand their planning permission to allow more caravans on their site for their adult children, while a further pitch single pitch site is currently vacant. Therefore, in total ORS spoke to around 46 households from a potential 62 households which is a 74% response rate. A further 11 interviews were achieved with Travelling Showpeople from a potential 14 households and these are discussed in Chapter 5 of this report.

6.4 Appendix A shows details of all known occupied pitches in the Fylde Coast Authorities area and is derived from Local Authority planning records plus the on-site survey.

6.5 For the full on-site interviews, the following number took place in each Local Authority:

» Blackpool – 24 interviews;
» Fylde – 11 interview; and
» Wyre – 0 interviews.
6.6 All of the interviews that were carried out were on sites in Blackpool and Fylde. No interviews were carried out in Wyre (see below).

Figure 9
Types of site where respondents lived (Source: Survey of Gypsy and Traveller Population Full On-site 2014)

<table>
<thead>
<tr>
<th></th>
<th>Authorised Site</th>
<th>Unauthorised site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>24</td>
<td>0</td>
</tr>
<tr>
<td>Fylde</td>
<td>1</td>
<td>10</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>25</td>
<td>10</td>
</tr>
</tbody>
</table>

6.7 We would note the only on-site population associated with Wyre are linked to an unauthorised site with a court order which prevents the eight households from re-occupying the land. The site was empty during the course of the study (we understand the male occupants were travelling and it is assumed other family members re-located to other sites), and attempts to contact one of the previous occupiers proved unsuccessful. However, the needs of the households have been included in the calculation of the pitch requirement (Section 6) as there is some indication that some of these residents wish to locate in Wyre. It was also the case that a number of private sites in Blackpool did not wish to take part in full interviews, but were happy to discuss their situation in a less structured interview format and did state that they wished to remain on their current sites and any current space was for other family members.

6.8 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 the Fylde Coast Authorities. 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.

6.9 It is also worth noting that there isn’t data for every single question on the questionnaire due to routing. There were also a small number of questions that not all respondents answered (these are noted in the commentary where applicable). This is not an unusual occurrence with interviews with Gypsies, Travellers and Travelling Showpeople.
Previous Residence

6.10 Respondents were asked where they were living previously; the majority reported having lived all over. Most of the other locations that respondents reported having lived previously were in the north of England or Scotland.

Figure 10
Where respondents were living previously (Source: Survey of Gypsy and Traveller Population On-site 2014)

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>All over</td>
<td>5</td>
</tr>
<tr>
<td>Blackpool</td>
<td>2</td>
</tr>
<tr>
<td>Bradford</td>
<td>1</td>
</tr>
<tr>
<td>Cumbria</td>
<td>4</td>
</tr>
<tr>
<td>Fleetwood</td>
<td>3</td>
</tr>
<tr>
<td>Lancaster</td>
<td>1</td>
</tr>
<tr>
<td>Nottinghamshire</td>
<td>1</td>
</tr>
<tr>
<td>Scotland</td>
<td>3</td>
</tr>
<tr>
<td>Wigan</td>
<td>3</td>
</tr>
<tr>
<td>Current residence (at the time of the survey)</td>
<td>2</td>
</tr>
<tr>
<td>Unknown</td>
<td>8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>27</strong></td>
</tr>
</tbody>
</table>

Type of Pitch

6.11 18 of the respondents that ORS spoke to lived on an authorised council run public site in Blackpool. 6 respondents lived on a privately rented pitch while one respondent lived on a pitch that they owned.

6.12 10 respondents also lived on unauthorised encampments (2 respondents) or unauthorised developments (8 respondents).

Figure 11
Type of pitch by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)
Length of Residence

6.13 Over three fifths (62%; 21 respondents) of all Gypsies and Travellers surveyed have lived in the Fylde Coast sub-region for more than 5 years. In addition, all respondents (35) identified their current site as being their permanent base.

Connections with the Area

6.14 With regards to connections to the Fylde Coast Authorities, the main links identified by respondents are that they’ve lived in the area a long time (37%, 13 respondents) and that family members work in the area (31%, 11 respondents).
Local Services

When asked what local services they use, respondents reported using a wide range of local services (see Figure 7 below). The services that respondents reported using most were: a Doctor (GP) (97%; 34 respondents), a pharmacy/chemist (94%; 33 respondents), shopping facilities (91%; 32 respondents) and local hospitals (89%; 31 respondents). The least used services were libraries (9%; 3 respondents) and childcare facilities (6%; 2 respondent), whilst only 3% (1 respondent) chose the ‘other’ option.

**Figure 14**
Local Services used in the Fylde Coast Authorities, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)

Bricks and Mortar

Although none of the respondents currently owned or rented a house, flat or bungalow, 10 respondents said they had previously lived in this type of accommodation. 7 of the 10 respondents had lived in bricks and mortar 10 years ago or longer. The other 3 respondents who had previously lived in bricks and mortar reported this to be within the last 10 years including 1 respondent who moved out of this type of accommodation within the last 12 months.

One respondent expressed a desire to move to bricks and mortar accommodation (a house) in the future.
Ethnic Background

6.18 Just under three fifths (57%, 20 respondents) explicitly identified themselves as being Romany Gypsies, while around a quarter (26%, 9 respondents) stated they are Irish Travellers. Only 11% of respondents are English Travellers and even fewer (6%, 2 respondents) are Scots Gypsies or Travellers.

Age of the Population

6.19 36% of household members are over 40 years of age, with 18% aged 60 years or older, whilst over a third (35%) are aged 16 or under, with 28% under 11 years old. In total there were 107 people across the 35 interviews. This gives an average household size of 3 people which is typical for Gypsies and Travellers.

Health Problems

6.20 57% of those interviewed (20 respondents) reported that their household contains at least one member with a health problem. Of those who report a health problem within the household, seven respondents report that their pitch doesn’t meet their needs. Of these 3 were on the Chapel Road site in Blackpool, 2 on private sites and 2 on Angel Lane, Hardhorn. Some of the reasons given by respondents include: difficulty getting into the bath, lack of ramps at doorways and no lighting on site resulting in problems getting in and out of the caravans. None of the households wished to move from their current pitch.
Existing Sites

6.21 All respondents were asked if they require extra caravans. The evidence from the survey is that 17% of households (6 respondents) would like more caravans within their existing pitch or site. 4 respondents reported the additional caravans are for older children, while 2 respondents say that they are required for adult relatives.

6.22 The phrasing of this question focused on a need rather than a demand for more caravans. Respondents were asked, irrespective of who was purchasing the caravans, whether they needed more caravans for household members. Therefore, this question simply reflected a perceived need for more caravans, rather than an ability to afford (demand for) more caravans.

6.23 When asked where these people who would need to live on the site, that are not able to at present, are currently living it was reported that they all currently travelling all over (2 respondents; they have nowhere to stop), in Northumberland (current home is overcrowded) and on the streets in Blackpool (homeless).

6.24 Four respondents referred to in paragraph 4.21 above felt that there is space on their current pitch for extra caravans/residential units. One respondent however said that they were considering applying for planning permission to extend their site.

6.25 No respondents reported members of their household wanting to leave permanently to live elsewhere in the next two years.

Perception of Current Sites

6.26 The majority of respondents are satisfied with their sites. 89% of respondents expressed satisfaction with their site, with only 3% (1 respondent) expressing dissatisfaction.

6.27 Figure 17 overleaf shows the improvements which are identified by respondents as being required at their permanent sites. Despite 89% being satisfied with their sites, only 40% of respondents feel that no improvements are required with these households being resident on Chapel Road and private sites in Blackpool.

6.28 Of those respondents who cite improvements, 34% (12 respondents) cite a need for improved toilet facilities, 29% (10 respondents) require improved washing facilities, and 23% (8 respondents) want improved road surfacing. The Angel Lane, Hardhorn site saw all households citing at least one improvement which was needed (although this is an unauthorised development).
Two thirds of respondents (66%) feel that their current accommodation and site, meets all of their needs in terms of accommodation quality and space. However, 12 respondents state that this was not the case for them.

Those who feel that their current accommodation and site do not meet their needs say this is because their site is too dirty/polluted, their accommodation is in a poor state of repair, a lack of facilities and because there is no play area for children.

Of the respondents who feel that their current accommodation and site do not meet their needs, all but 1 respondent reports that their needs could be met at their current site. Clearly issues such as the lack of planning permission and on-going enforcement action at Angel Lane, Hardhorn would prevent any further investment in this site to address problems.

1 respondent said that they would need to move to a new permanent base in Blackpool within the next 15 years. The reason for moving to Blackpool was that the respondent knows the area and had friends there.
Travelling

6.34 Ten respondents (3 from Fylde and 7 from Blackpool) reported that they have made one or more trips away from their pitch/permanent base in the last 12 months.

6.35 Figure 17 below shows the total time that these 10 respondents spent travelling in a caravan or trailer away from their site or permanent base in the last 12 months.

6.36 Figure 18 shows the types of stopping places that respondents reported travelling to in the last 12 months. The 7 respondents who reported stopping at ‘other types of site’ stayed on the side of the road (4 respondents), with friends (1 respondent), in a field (1 respondent) and abroad on holiday (1 respondent).

Figure 18
Total time spent travelling in a caravan or trailer away from their site or permanent base in the last 12 months by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)

Figure 19
Which of the following types of stopping places did you travel to in the last 12 months by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)
Respondents who travel were asked whether the level of travelling they reported in the last 12 months was normal, or whether it had changed in the past few years. 6 respondents said that it was ‘normal’, while 3 respondents said that they had travelled less in the last 12 months and 1 respondent said that they had travelled more.

When asked why their levels of travelling had changed, 3 respondents said that it because there is nowhere to stop while the other said that it was because they are retired.

Summer (June to August) was the most popular time to travel with 8 respondents reporting that they typically travel at this time. 3 respondents also reported typically travelling in Spring (March-May).

The main reasons for travelling were reported to be for fairs (8 respondents), work (3 respondents) and holidays (2 respondents).

Respondents who did not travel in the last 12 months were asked the reason for this. The table below shows the reasons that respondents gave.

<table>
<thead>
<tr>
<th>Reason for not travelling</th>
<th>Frequency of comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Settled</td>
<td>8</td>
</tr>
<tr>
<td>Children at school</td>
<td>6</td>
</tr>
<tr>
<td>Health reasons/disability</td>
<td>5</td>
</tr>
<tr>
<td>There is no-where to stop</td>
<td>5</td>
</tr>
<tr>
<td>Age</td>
<td>4</td>
</tr>
<tr>
<td>Like current site/area</td>
<td>3</td>
</tr>
<tr>
<td>No desire to travel</td>
<td>2</td>
</tr>
<tr>
<td>On own</td>
<td>2</td>
</tr>
<tr>
<td>Never travelled</td>
<td>1</td>
</tr>
<tr>
<td>Affordability</td>
<td>1</td>
</tr>
</tbody>
</table>
6.42 The 25 respondents who reported not having travelled in the last 12 months were asked if they’d travelled in the past. All but one respondent had.

Figure 22
Past travelling by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)

6.43 The 24 respondents who had travelled in the past were asked their reasons for not travelling in the last 12 months. The most common reason was wanting a more settled lifestyle, followed by the ill health of some family members.

Figure 23
Reasons for not travelling in the last 12 months, by all Respondents (Source: Survey of Gypsy and Traveller Population On-site 2014)

6.44 4 respondents reported having experienced problems at gypsy or traveller sites or on temporary stopping places. The reasons given were that they get moved on and because they cannot stop for long at temporary stopping places.

6.45 When asked what facilities and amenities they felt should be provided on transit sites and temporary stopping places, the vast majority of respondents thought that toilets, shower/bath facilities, electricity and standpipes/a water supply were needed.
7. Travelling Showpeople Interviews and Survey Results

Introduction

7.1 This section focuses on the needs and aspirations of Travelling Showpeople in the Fylde Coast Authorities. 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).

7.2 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. Due to the low number of interviews obtained, figures have been quoted in number of respondents where possible rather than percentages. 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

7.3 During the course of the household survey interviews were attempted with all Travelling Showpeople households in the area. Contact was made with the residents of all known Travelling Showperson sites and 11 interviews were completed. 9 of these interviews were carried out on the Garstang site in Wyre; the other two interviews were carried out on unauthorised yards in Blackpool.

7.4 It is worth noting that there isn’t data for every single question on the questionnaire due to routing. There are also a small number of some of questions where not all respondents answered (these are noted in the commentary where applicable). This is not an unusual occurrence with interviews with this group.
Length of Residence

7.5 Of the 11 Travelling Showpeople interviewed, there is an even spread in terms of length of residency, with almost two fifths (4) of respondents having lived at their current address for between 1 and 3 years. 3 respondents report that they have lived at their current address for between 3 and 5 years and 5 or more years respectively, whilst only 1 says they’ve lived at their current address for less than 6 months (Figure 22).

7.6 When asked about their previous address, 4 households had lived in Bolton, 2 at Wigton in Cumbria, and one each in Lincolnshire, Wigan, Runcorn and Wales. 1 respondent did not give an answer to this question.

Connections with the Area

7.7 Respondents noted a variety of different connections to their local area (see figure 23 below), with the main links identified being that their friends are from this area (27%; 3 respondents), that their children go to school in this area (18%; 2 respondents) and that family members work in this area (18%; 2 respondents). Respondents also list ‘other’ connections, all of which seem to be linked to work e.g. ‘all my work is in the area’, ‘work in area’ and ‘work is all around my area’.

Figure 24
Length of Time Respondents and their family have lived at current address, by all Respondents
(Source: Survey of Travelling Showpeople Population On-site 2014)

Figure 25
Nature of Connections to the Fylde Local Authorities, by all Respondents
(Source: Survey of Travelling Showpeople Population On-site 2014)
Local Services

When asked what local services they use, respondents reported using a wide range of local services (see Figure 13 below). The services that respondents reported using most were: a Doctor (GP) (100%; 11 respondents), shopping facilities (100%; 11 respondents) and a pharmacy/chemist (91%; 10 respondents). The least used services were public transport (9%; 1 respondent) and council/neighbourhood offices (9%; 1 respondent).

Figure 26
Local Services used in the Fylde Coast Authorities, by all Respondents (Source: Survey of Travelling Showpeople Population On-site 2014)

Bricks and Mortar

2 respondents currently own or rent a house, flat or bungalow, whilst a further 1 respondent said they had previously lived in this type of accommodation over 10 years ago. None expressed a desire to move to bricks and mortar in the future.
Housing Needs

7.10 While 6 respondents felt that their needs in terms of accommodation quality and space were met at their current yard, 5 respondents did not. Including both on unauthorised yards in Blackpool.

7.11 Of the respondents who felt that their needs were not met at their current accommodation, 3 felt the yard was too small, 1 said the yard is lacking facilities and 1 chose the ‘other’ option.

7.12 With regards to the 5 respondents who felt their needs were not met at their current accommodation, 3 said their needs can be addressed at their current plot, 1 said they would like to move to another plot at the same yard, whilst 1 said they would like to move to another yard altogether. This household is on an unauthorised site in Blackpool and wish to stay in the area on a more suitable site.

Future Needs

7.13 The majority of respondents (7) feel that no improvements are required at their current yard. However, for the few that feel improvements can be made to their yard, less plots (11%, 1 respondent), better laundry facilities (11%, 1 respondent) and better washing facilities (11%; 1 respondent) were the options cited by respondents. Given that none of the sites surveyed had permanent planning permission then it is a surprisingly low figure as investment often won’t take place without planning permission.
3 respondents said that they would need to move to a new permanent base within the next 15 years. These respondents said that they would like to move to a number of locations including Blackpool, Garstang, Poulton-le-Fylde, Thornton, Cleveleys, Rural Wyre, Lytham and St Annes and Rural Fylde. Reasons given by respondents for wanting to move include: the need for more stability and space, planning permission expiring on existing site in the coming months and current site is due for redevelopment soon.

### Satisfaction with Living at Current Address

9 respondents said that they are satisfied with living at their current address – only 1 said they are dissatisfied.

When respondents were asked to explain their level of satisfaction, reasons included: liking the site, the area and the surrounding facilities/amenities and their children being settled in a local school. The one person that was dissatisfied reported being happy to live in the area but not on their current yard because of its size (too small) and because it is not a proper Showperson site.

### Age and Household Profile

Households surveyed displayed an older age profile than for Gypsies and Travellers, with 13 household members aged 40 years or older. A further 6 were aged between 25 and 39 years, whilst there were only 6 household members aged 16 or under.

4 respondents interviewed identified that their household contains at least one member with a health problem. Of these respondents, 2 reported that their home doesn’t meet the needs of those with health issues. One of these relates to the households on an unauthorised yard in Blackpool who wish to move to a more suitable yard.
8. Future Site Provision

Site Provision

8.1 This section focuses on the extra site provision for Gypsies, Travellers and Travelling Showpeople required in the Fylde Coast sub-region over a 17 year period. At the time of writing all three local authorities are working on local plans which anticipate different end dates, the furthest away in time being the Wyre Local Plan with an end date of 2031. For the purposes of this study, therefore, the calculation of need has been made to be consistent with this date, although each local authority will need to take a view on the application of the recommendations to their own circumstances.

8.2 This section concentrates not only upon the total extra provision which is required in the sub-region but whether there is a need for any transit sites and/or emergency stopping place provision.

8.3 Prior to the current round of local plans, pitch and yard (plot) provision for each local authority was considered at a regional level by the 2009 Partial Review of the Regional Spatial Strategy (RSS) for the North West. A key part of the evidence base for the Review was the 2007 Lancashire Sub-Regional Gypsy and Traveller Accommodation and Related Services Assessment. However, as the Coalition Government has abolished the NW RSS, strategic policy is now formed by the government’s National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012, with the responsibility for meeting pitch and plot needs delegated to individual local plans (albeit in the context of the Duty to Co-operate).

8.4 The baseline for our estimates of pitch and plot need is January 2014. We have modelled on any current needs in each authority being a backlog which exists at January 2014 and then allowed for additional future needs as they are likely to arise. In this case the backlog of need includes concealed households, those on unauthorised sites who do not wish to move and those in bricks and mortar seeking to move to sites at the time of the survey in January 2014.

8.5 The location of future pitch and plot provision is a key issue within joint studies. The estimates for local authorities within this study are based upon the location where needs will arise. This is not necessarily the same location as where need should be met. For example, it is difficult for households to express a desire to live on a public site in an area which currently has no such provision. Households were asked about where they wanted to move to during the household survey and none indicated that they wish to move to another local authority, but Gypsies, Travellers and Travelling Showpeople are not constrained by local authority boundaries and potentially the requirement for one local authority could be met in a neighbouring area. When asked by ORS, CLG have confirmed that Gypsy and Traveller Accommodation Needs Assessments are not the correct place to consider reallocating need across local authority boundaries and instead this is a Duty to Cooperate issue. Therefore, we have not made explicit assumptions about the allocation of needs arising in one area being met in another area.

8.6 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. While there is practice guidance from 2007 for Gypsy and Traveller Accommodation Assessments, this largely links to
Circular 01/06 which was replaced by Planning Policy for Traveller Sites. Methodologies for Gypsy and Traveller Accommodation Assessments have evolved since 2007 and CLG in a letter from the Planning Minister, Brandon Lewis MP to Andrew Selous MP which was placed in the House of Commons library on March 26th 2014 it was stated that CLG are reviewing the guidance documentation.

8.7 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 and plots

8.8 Pitches/plots which are available for use can come from a variety of sources. These include

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

### Current Need

8.9 There are three key components of current need. Total current need (which is not necessarily need for additional pitches/plots) 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

8.10 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.

8.11 We will firstly provide the model as set out above for Gypsies and Travellers within the whole Fylde Coast area and then for each authority. We will then separately analyse the need for additional transit provision in the study area before repeating the calculation for Travelling Showpeople.

### Gypsies and Travellers

#### Current Gypsy Site Provision

8.12 We consider that there are 49 occupied authorised pitches across the Fylde Coast plus 21 pitches on current or recent unauthorised developments. This figure excludes one empty pitch in Blackpool. Details of all known sites are shown in Appendix A.
As we have noted above, the Fylde Coast is a popular location for residential park home sites and that some of these sites may, in part, be occupied by Gypsies and Travellers. However, for the reasons explained above, we have not counted these as part of the current provision. Not all Gypsies and Travellers live in caravans on specific sites – some families reside in bricks and mortar accommodation and can contribute to future need, as explained further below. While it can be argued that some households will leave sites for bricks and mortar, other currently unknown households may wish to move in the opposite direction. Therefore we have assumed that households and their children who currently live on Gypsy and Traveller and Travelling Showpeople sites continue to do so and that those currently off sites but wishing to live on one can also have a pitch.

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 or sites which are likely to come back into use;
» Migration away from the area; and
» Movement to bricks and mortar.

With the exception of one private pitch in Blackpool at Fishers Lane which council tax records and the on-site survey indicate is empty, all authorised pitches are occupied by individuals who identify themselves as Travellers. We have not counted the one empty pitch as part of the future supply because it is a private site and there is no indication that it is available for the use of anyone else. No new sites have been granted planning permission. A site in Fylde (Thames Street, Newton) has been the subject of a planning application for 4 pitches. On 18th December 2013 this was considered by the relevant committee which was Minded to Approve the application subject to a possible Secretary of State call-in. At the time of writing, the local authority have received notice of a call-in by the Secretary of State and as such we have not counted this site as part of the future supply. However, should approval be forthcoming, this site would count towards Fylde’s needs as detailed overleaf. As noted above, the occupants of the site in Preesall, Wyre have not been in residence since May 2013 and there is an injunction preventing their return. Accordingly, and given the planning issues highlighted above, we have not counted this site as part of Wyre’s future supply.

In and out-migration and movements from sites to bricks and mortar and vice versa have been considered in the current and future need sections of the calculation.

**Additional Site Provision: Current Need**

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 and Recent Unauthorised Developments

8.18 A problem with many Gypsy and Traveller Accommodation Assessments is that they have counted all caravans on unauthorised sites or encampments as requiring a pitch in the area when in practice many are simply visiting. We have adopted the approach that the only households identified as being in need from this source are those already in the planning system (i.e. have attempted to gain planning permission or are known to be permanently resident on the site), those otherwise known to the Local Authorities as being resident in the area or those identified through the household survey as requiring pitches.

8.19 For unauthorised sites, evidence from the three Local Authorities and the household survey indicates that there are 15 households on the Angel Lane unauthorised site in Fylde. As indicated above, when it was occupied, there were eight households on the Blueberry Park unauthorised site at Preesall in Wyre. However, the planning agent who represented the group did not believe all eight households were still interested in occupying the site. Instead, she suggested that six households would still wish to do so. Therefore although the Preesall site itself is, and will remain, unoccupied, we have counted these six households as part of the current need. This could be classified as unauthorised households or in-migration. Given that the site doesn’t exist within the supply, we have chosen to classify them under unauthorised developments. There are no unauthorised Gypsy and Traveller sites in Blackpool. Therefore, in total we have counted 21 households on current or recent unauthorised pitches.

Figure 31
Unauthorised Pitches by Local Authority (current and recent)

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>0</td>
</tr>
<tr>
<td>Fylde</td>
<td>15</td>
</tr>
<tr>
<td>Wyre</td>
<td>6*</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>21</strong></td>
</tr>
</tbody>
</table>

*Households currently outside the area who occupied an unauthorised site in the borough

Concealed Households

8.20 There is no specific definition of a concealed household in Planning Policy for Traveller Sites. The definition of a concealed household in the 2011 Census is one living in a multi-family household in addition to the primary family, such as a young couple living with parents. This definition does not allow for single persons to be concealed households unless they are a lone parent.

8.21 Planning Practice Guidance states that Plan Makers should establish unmet (gross) need for affordable housing by assessing past trends and recording current estimates including the number of concealed households. ORS feel that this can also include adults living within a primary family who require their own accommodation as current need.

8.22 Where a concealed household under either of these definitions wishes to form their own separate family unit, but are unable to do so because for example of a lack of space on public or private sites or yards, they become a component of need. Information on concealed households was obtained from the site or yard survey.
8.23 The on-site survey identified a small number of concealed households in the study area. In the case of a site in Applewood, Jubilee Lane (Blackpool) the site owner contacted ORS to say they are not overcrowded, but that they wish to increase their site capacity in the future from 2 to 4 pitches to allow space for their adult sons and daughters and their children who are currently travelling. Again these households could be considered as in-migrants because they are currently travelling, but we have classified them as concealed for simplicity. The on-site survey also found evidence of one concealed household on the public site at Chapel Road. The site waiting list held by Blackpool indicates other households on-site in Blackpool seeking their own pitch on the Chapel Road site. However, these households would free a pitch on a private site if they moved to a public site and hence do not generate a net additional need.

8.24 For Fylde, the unauthorised site at Angel Lane has sought permission for 15 pitches. The household survey found at least three of these were doubled up with respondents reporting more than one household on a pitch. However, the planning agent for the site indicated that these concealed households are linked to the Preasall site in Wyre, so would be double counted if included as concealed households here.

**Table 32**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>3</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3</strong></td>
</tr>
</tbody>
</table>

**Bricks and Mortar**

8.25 Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. As noted in Chapter 2, the 2011 UK Census of Population identified 127 Gypsy and Traveller households in the study area.

8.26 The on-site survey identified one household in Blackpool wanting to move from a site to bricks and mortar accommodation.

8.27 All Stakeholders who took part in this study were asked if they could assist ORS by providing contacts for Gypsies and Travellers and Travelling Showpeople living in bricks and mortar. One stakeholder agreed to make contact with six housed Travellers and ORS provided the stakeholder with a letter which outlined the aims and objectives of the study and invited the housed Travellers to take part in a confidential telephone interview. None of the six contacted ORS and when this was followed-up and the stakeholder was of the opinion that most housed Travellers were settled in bricks and mortar and would not be interested in site accommodation.

8.28 Households who are seeking to move from housing to public sites can also express a desire or need to do so through registering on an appropriate waiting list. There are 7 households in Blackpool who have done this, while no households in Fylde and Wyre are known to be seeking on-site accommodation while living in bricks and mortar by registering on a waiting list.

8.29 ORS publicised the Assessment through the Friends and Families of Travellers Facebook page, the Travellers Times website and the World’s Fair publication.
Despite the aforementioned efforts, no Travellers residing in bricks and mortar and mobile home accommodation came forward for interview.

After this ORS worked closely with an Officer employed within the Ethnic Minority & Gypsy, Roma and Traveller Achievement Service at Lancashire County Council who was allotted time to visit Travellers at their home and discussed the aims and objectives of the study. If they agreed to take part, the Officer contacted an ORS researcher over the telephone who conducted an interview. In some cases, the Officer also left information with the family or passed on their phone number for ORS to get in touch with them. This was a different process to the wider household survey as it only sought to capture information about whether there was a need to move to a site, and any other family circumstances that could be used to estimate the number of pitches required and location of the pitches. For example where there are close family ties, support requirements or land holdings.

During the course of the study, the Officer attempted to access ten families in Wyre (Fleetwood, Cleveleys and Poulton) and fifteen families in Blackpool. No contacts were identified in Fylde.

As a result of this a total of 11 interviews were completed with families living in bricks and mortar accommodation. This included 10 families in Blackpool and 1 in Wyre, but none in Fylde – although the Census only identified 6 Gypsy and Traveller households in Fylde in 2011. The Officer felt that a number of issues arose when attempting to contact and engage with the Gypsy and Traveller community living in bricks and mortar.

- Not in at time of visit;
- Cannot read and write if information left;
- Moved address and cannot be found;
- Away for work;
- Reluctant to give personal information even though it is stressed it is confidential; and
- Reluctant to recommend others for assessment as not sure if the family would wish to engage.

As a result of these interviews a total of 12 family units currently living in bricks and mortar who wish to move onto a site were identified. This includes 1 concealed household where a grown up child and partner are living in a caravan adjacent to a house and 1 household from outside of the study area who had been forced to move from her family due to a lack of space. A number of the households had previously lived on public and private sites in the study area but had been forced to move from the sites due a range of family related circumstances. Where these families have expressed a desire to move to a site but have not expressed where, for the purposes of this report they have been recorded as having a need based in the areas where they are currently living. Where they have specified a particular area or have demonstrated rationale for living in one of the other Council areas they have been recorded as need against that area. This includes where they have existing family ties, family support issues or land holdings. None of these households are currently on a waiting list for a public site in the study area. This results in 6 households in bricks and mortar with need in Blackpool and 6 with need in Wyre.

In addition, Fylde Council, together with ORS, identified a number of mobile home sites across their area with possible Gypsy and Traveller occupancy (at least in part). ORS sent two letters to the owners of all
such mobile home sites and invited them to take part in a confidential interview. Only one person responded to the follow-up letter. The person would not provide details of the site but confirmed that there were no Gypsies and Travellers living on the site and explained that ‘Park Home’ type accommodation does not fit in with their lifestyle.

8.36 In ORS' experience of working with other Local Authorities throughout the UK, even in areas which have a long-standing Traveller community and have established representative groups, identifying housed Travellers is a difficult exercise which isn’t easily resolved. The Fylde Coast Authorities will need to keep this issue in mind and co-operate to improve communication with the Travelling community.

### Figure 33
Desire to Move between Sites and Bricks and Mortar by Local Authority

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Movement from sites to bricks and mortar</th>
<th>Movement from bricks and mortar to sites</th>
<th>Net movement from bricks and mortar to sites</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>1</td>
<td>13</td>
<td>12</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1</strong></td>
<td><strong>19</strong></td>
<td><strong>18</strong></td>
</tr>
</tbody>
</table>

### Summary

8.37 The table below summarises the assumed number of households by authority and source with the figure for each outlined in more detail below.

### Figure 34
Number of Households by Local Authority and Source

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Permanent permission</th>
<th>Temporary permission</th>
<th>In bricks and mortar</th>
<th>Tolerated sites</th>
<th>Concealed Households</th>
<th>Unauthorised households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>43</td>
<td>0</td>
<td>12</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>58</td>
</tr>
<tr>
<td>Fylde</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>15</td>
<td>21</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
<td>0</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>6*</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>49</strong></td>
<td><strong>0</strong></td>
<td><strong>18</strong></td>
<td><strong>0</strong></td>
<td><strong>3</strong></td>
<td><strong>21</strong></td>
<td><strong>91</strong></td>
</tr>
</tbody>
</table>

*Households currently outside the area who occupied an unauthorised site in the borough

### Additional Site Provision: Future Need

8.38 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

8.39 There are no pitches on sites with temporary planning permission in the study area.
New Household Formation

8.40 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 North West of England Regional plan. However, a 3.00% 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.

8.41 In a study on behalf of Office of the Deputy Prime Minister in 2003 (Local Authority Gypsy and Traveller Sites in England Office of the Deputy Prime Minister, 2003), University of Birmingham researcher Pat Niner identified that household growth rates of 2.00%-3.00% per cent a year were appropriate when projecting future formations.

8.42 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 3.00% 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.’

8.43 Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates. This position was confirmed in a letter from the Planning Minister, Brandon Lewis MP, to Andrew Selous MP which was placed in the House of Commons library on March 26th 2014 and stated:

‘I can confirm that the annual growth rate figure of 3% does not represent national planning policy.

The previous Administration’s guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority’s own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure,’

8.44 Over the past year, ORS have been undertaking detailed demographic work for Gypsy and Traveller populations and 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 local evidence is much lower than 3.00% at around 1.50%. This can be found in Appendix C.

8.45 A population growth rate of 1.50% will not necessarily equate to a household growth rate of 1.50%. 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 projections highlight a natural change in the population of 0.50% 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 of 0.95% per annum.
ORS believe that the 3.00% 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.

As part of this study ORS have looked at the age demographic of the Travelling Community in each of the three local authority areas. The household survey undertaken as part of this GTAA indicates a different age profile in each of the three areas. We see a relatively young population on the unauthorised site in Angel Lane in Fylde with around 27 children in the 15 households. This will lead to higher levels of new household formation. Conversely, the sites in Blackpool contain a larger proportion of older persons and families with over half of the pitches containing only one or two persons. This will lead to a lower level of formations. The situation in Wyre is harder to determine due to the residents of the former unauthorised site having moved on. However it is our understanding that the site comprised of Irish Travellers who typically have fairly large families. Although the Census identifies a Gypsy and Traveller population in Wyre living in bricks and mortar housing, our engagement with those we were able to contact elicited a limited response and there was evidence that some had moved on. As such, we have no evidence that this is a population that in general has a particular wish to live on-site. We have therefore made a reasonable assumption that the demand for new pitches over time through household formation from this source will be minimal.

Given the differences in the age demographics of the community, and the results of our engagement, we have used a higher rate of growth for the population in Fylde than in Blackpool. Therefore for Blackpool we have used 2.00% and for Fylde we have used 2.50% (although the actual difference in pitches between the two rates is nil). We have also used the lower rate of 2.00% for Wyre as in our view the demand for new pitches will be lower than in Fylde. Again, in reality there is a negligible impact on pitch numbers. Given that the evidence for population growth nationally is as low as 1.50% per annum, we consider that these rates will provide enough pitches to accommodate all newly forming households in the Fylde Coast sub-region. When including the impact of compound growth, a 2.50% growth per annum provides for 13% growth over 5 years, 28% growth over 10 years, 45% growth over 15 years and 52% over 17 years. A 2.00% growth rate provides for 10% growth over 5 years, 22% growth over 10 years, 35% growth over 15 years and 40% over 17 years.

In terms of the total number of household formations per authority the table below sets out the baseline position for population and the number of new household formations over 17 years. The Blackpool figure of 58 households does not count the one vacant pitch in the area. It is assumed that each forming household requires a pitch of their own.

**Table:**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Existing Households on Site (January 2014) (^1)</th>
<th>Household Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool (2.00%)</td>
<td>58</td>
<td>23</td>
</tr>
<tr>
<td>Fylde (2.50%)</td>
<td>21</td>
<td>11</td>
</tr>
<tr>
<td>Wyre (2.00%)</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>91</strong></td>
<td><strong>39</strong></td>
</tr>
</tbody>
</table>

\(^1\) Households as surveyed, including those living on-site, concealed households and those living in bricks and mortar
In-migration from Other Sources

8.50 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 the Fylde Coast 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.

8.51 Overall, the level of in-migration to the Fylde Coast 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 the Fylde Coast.

8.52 ORS would note that the waiting list for public sites in Blackpool contains 20 households who are outside the Fylde Coast area who are seeking to move to the Chapel Road site in Blackpool. For 9 of these households, their current location is not known, while the majority of the rest are on authorised sites elsewhere. Counting these households as need in Blackpool would clearly lead to potential double counting between areas as the pitches they are vacating would not be considered as supply in the areas they are leaving. On this basis we have allowed for net migration to sum to zero assuming in and out migration are balanced. 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 Fylde Coast. If and when new planning applications come forward to meet needs which arise from outside the Fylde Coast, ORS 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 the authorities to have clear criteria based planning policies in place for any new potential sites which do arise.

Overall Needs for Fylde Coast

8.53 The estimated extra residential site provision that is required now and in the near future for the three authorities will be **81 pitches** to address the needs of all identifiable households. This includes the existing households on unauthorised sites, concealed households, those on the waiting list for Chapel Road who are in bricks and mortar, not other movement from bricks and mortar, and growth in household numbers due to household formation.
Figure 36
Extra Pitches which are required in Fylde Coast from 2014-2031

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply of Pitches</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty pitches</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Additional supply new sites</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Total Supply</td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Current Need</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current and recent unauthorised developments or encampments</td>
<td>21</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Concealed households</td>
<td>3</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>18</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total Current Need</td>
<td></td>
<td>42</td>
<td></td>
</tr>
<tr>
<td>Future Needs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on sites with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>39</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total Future Needs</td>
<td></td>
<td>39</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>81</td>
<td>0</td>
</tr>
</tbody>
</table>

Overall Needs for Each Authority

8.54 To provide estimates for each Local Authority, ORS has apportioned the needs outlined above by Local Authority on the basis of where the need currently arises or where future household growth will arise. As discussed earlier, this process inevitably places a low amount of need in areas which currently have low populations while placing higher needs in authorities with larger populations. Therefore, potentially the requirement being generated in one Local Authority could be met in a neighbouring area.

8.55 It is also important to note that as a general rule households living in bricks and mortar who have expressed a wish to live on a site have been recorded in the area where they are currently living. Whilst some did express a preference for a particular site, most stated that they didn’t mind whether they moved to a site in Blackpool, Fylde or Wyre. However, where they have specified a particular area or have demonstrated rationale for living in one of the other Council areas they have been recorded as need against that area. This includes where they have existing family ties, family support issues or land holdings. The final allocation of this need will need to be agreed by the 3 council’s under the Duty to Co-operate.

8.56 The Regional Spatial Strategy process sought to allocate provision across the entire region and had the potential to allocate sites to areas with a low current population to provide greater equality in the provision of sites ensuring Gypsy and Travellers communities had a greater and fairer choice of sites and authorities in which to reside. Planning Policy for Traveller Sites encourages Local Authorities to produce joint plans for Gypsy and Traveller needs but there is now no formal process for allocating needs arising in one authority as provision in another authority. ORS queried this issue with CLG in 2013 and were informed that Gypsy and Traveller Accommodation Needs Assessments were not the correct place to reallocate needs across local authority boundaries and instead that this was a Duty to Cooperate issue. Therefore it is only possible to consider needs for each area under consideration.
## Blackpool

**Figure 37**
**Extra Pitches which are required in Blackpool from 2014-2031**

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply of Pitches</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty pitches</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Additional supply new sites</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Supply</td>
<td></td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Current Need</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>0</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Concealed households</td>
<td>3</td>
<td>-</td>
<td>3</td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>12</td>
<td>-</td>
<td>12</td>
</tr>
<tr>
<td>Total Current Need</td>
<td></td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Future Needs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on sites with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td>0</td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td>0</td>
</tr>
<tr>
<td>New household formation</td>
<td>23</td>
<td>-</td>
<td>23</td>
</tr>
<tr>
<td>Total Future Needs</td>
<td></td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>38</td>
<td>0</td>
</tr>
</tbody>
</table>
### Fylde

#### Figure 38
Extra Pitches which are required in Fylde from 2014-2031

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply of Pitches</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty pitches</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Additional supply new sites</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td></td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Current Need</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>15</td>
<td></td>
<td>15</td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total Current Need</strong></td>
<td></td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td><strong>Future Needs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on sites with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>New household formation</td>
<td>11</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total Future Needs</strong></td>
<td></td>
<td>11</td>
<td>11</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>26</td>
<td>0</td>
</tr>
</tbody>
</table>
## Wyre

### Figure 39
Extra Pitches which are required in Wyre from 2014-2028

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply of Pitches</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty pitches</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Additional supply new sites</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Current Need</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>6</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>6</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Current Need</strong></td>
<td></td>
<td>12</td>
<td></td>
</tr>
<tr>
<td><strong>Future Needs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on sites with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>5</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Future Needs</strong></td>
<td></td>
<td>5</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>17</td>
<td>0</td>
</tr>
</tbody>
</table>

**Note:** The supply includes additional supply from empty pitches and new sites, while the current need includes current unauthorised developments and encampments, concealed households, and net movement from bricks and mortar. The future needs are based on current on sites with temporary planning permission, net migration, and new household formation.
**Split to 2031**

8.57 In terms of providing results by time periods we have assumed that all unauthorised sites, concealed households and bricks and mortar needs are addressed in the first 5 years. Household formation is apportioned over time at 2.00% per annum in Wyre and Blackpool and 2.50% per annum in Fylde. This means that each year more households will exist in each authority so the growth rate is applied to a growing population.

**Figure 40**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>2014-2019</th>
<th>2019-2024</th>
<th>2024-2029</th>
<th>2029-2031</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>21</td>
<td>7</td>
<td>7</td>
<td>3</td>
<td>38</td>
</tr>
<tr>
<td>Fylde</td>
<td>17</td>
<td>3</td>
<td>4</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td>Wyre</td>
<td>12</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>50</td>
<td>12</td>
<td>13</td>
<td>6</td>
<td>81</td>
</tr>
</tbody>
</table>

*To be consistent with local plan timescales across the Fylde Coast sub-region a year is taken as 1st April; to 31st March.

**Transit/Emergency Stopping Site Provision**

8.58 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. They do not have a function in meeting local need which must be addressed on permanent sites.

8.59 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.

8.60 Currently, Blackpool has 3 pitches on a public transit site, but there is no transit site in the Lancashire County. The site in Blackpool cannot be used to redirect Travellers from within Lancashire.

8.61 As well as facilitating the accommodation needs of household visiting an area, the presence of a transit site or emergency stopping place in an area can speed up enforcement on unauthorised encampments, with households facing committing an offence if they do not move on to the site, or leave the County. However, we would note that Local Authorities are not able to use transit provision on private sites as part of their enforcement action policies and therefore while it does provide an option for visiting households, entrance to the site is at the discretion of the site owner. It should also be noted that strengthened Police powers can only be triggered if a transit site or temporary stopping place is made available within a specific local authority area. The legislation does not currently allow the direction of Travellers across local authority boundaries to a transit site in an adjacent area.

8.62 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. Evidence from the caravan count and from Lancashire County Council indicates that there are a significant number of
encampments each year in Lancashire which a transit site may help to address. We consider that households visiting Wyre and Fylde do need access to a transit site, but this would not necessarily have to be located in these authorities. We would note that transit sites are an area where cross boundary working could prove to be particularly effective and that the transit needs of Gypsy and Travellers visiting Lancashire are an issue which should be considered at a more strategic level. For clarity we consider that the transit site in Blackpool is addressing the needs of Blackpool, while at least one transit site is required in Lancashire County Council area, but not necessarily in Fylde or Wyre.

** Travelling Showpeople

**Needs for Plots for Travelling Showpeople**

8.63 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 none are on unauthorised sites, no plots are expected to be freed for any reason and there is no waiting list for sites. Therefore, the needs are typically driven by concealed households at existing sites and household growth.

8.64 As outlined in Chapter 2, the situation with Travelling Showpeople is that there are only four yards in the study area, two in Blackpool, and one each in Fylde and Wyre. The Blackpool yards are unauthorised, the Wyre yard had a temporary planning permission which expired in May 2014 but has been extended to May 2015 whilst this report was being drafted. In Fylde there is one yard which has a full planning permission.

**Current Travelling Showperson Yard Provision**

8.65 There are currently 14 households on yards in the study area. We have assumed that households currently and wishing to live on sites continue to do so and their children will also live on sites. Currently, there are 2 authorised plots that have permanent permission and whilst no new yards have been granted permanent planning permission, the site at Kepple Lane in Wyre has had its temporary permission extended by 1 year to May 2015. Although there may be an empty plot on the site in Fylde, we have not assumed that this is available for the use of anyone else, so there is no free space on existing yards.

**Additional Yard Provision: Current Need**

8.66 The next stage of the process is to assess how many households are currently seeking plots in the area. Households who are likely to be seeking plots will include:

» Those on unauthorised developments for which planning permission is not expected;

» Concealed households; and

» Those in bricks and mortar wishing to move to sites.

**Current Unauthorised Developments**

8.67 Two yards in Blackpool currently contain single plots and are unauthorised. These are the only unauthorised yards in the study area.
Figure 41
Unauthorised Plots by Local Authority

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>2</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>2</td>
</tr>
</tbody>
</table>

Concealed Households

None of the yards in the study area show any indications of concealed households.

Bricks and Mortar

There is no evidence of any movement between bricks and mortar in either direction.

Additional Site Provision: Future Need

The next stage of the process is to assess how many households are likely to be seeking plots in the area in the future. Households who are likely to be seeking plots will include those:

» Living on yards with temporary planning permissions;
» Expected to be newly forming during the study period; and
» Migrating to yards from outside the study area.

Temporary Planning Permissions

There are 10 plots on a site in Wyre where the planning permission was due to expire in May 2014 but has been extended to May 2015 whilst this report was being drafted. These plots have been counted as temporary at the base date for the assessment.

Figure 42
Temporary Planning Permissions by Local Authority

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>0</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>10</td>
</tr>
<tr>
<td>Total</td>
<td>10</td>
</tr>
</tbody>
</table>

New Household Formation

For household growth, the typical growth rate for the Travelling Showpeople population is lower than for Gypsies and Travellers with estimates normally being from 1.00%-1.50%. 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 1.00% provides for total net growth of 18% over 17 years.

The table below shows the number of households by authority.

### Table 43
**Number of Households by Local Authority and Source**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Permanent permission</th>
<th>Temporary permission</th>
<th>In bricks and mortar</th>
<th>Tolerated sites</th>
<th>Concealed Households</th>
<th>Unauthorised pitches</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Fylde</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Wyre</td>
<td>0</td>
<td>10</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2</strong></td>
<td><strong>10</strong></td>
<td><strong>0</strong></td>
<td><strong>0</strong></td>
<td><strong>0</strong></td>
<td><strong>2</strong></td>
<td><strong>14</strong></td>
</tr>
</tbody>
</table>

Given that there are 10 households on-site in Wyre this equates to 2 additional households by 2031. However, at this rate of growth, the 2 households in both Blackpool and Fylde will not yield any formations.

### Table 44
**Number of Household Formations in the Period 2014-2031**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Households on yards</th>
<th>Household growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Fylde</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>10</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>14</strong></td>
<td><strong>2</strong></td>
</tr>
</tbody>
</table>

**In-migration from Other Sources**

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 Fylde Coast

The estimated extra residential plot provision that is required now and in the near future for the three authorities will be 14 plots to address the needs of all identifiable households. This includes the existing households on unauthorised sites, those with temporary planning permissions and growth in household numbers due to household formation.

Figure 45
Extra Plots which are required in Fylde Coast from 2014-2031

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply of Plots</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty plots</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Additional supply new yards</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Supply</td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Current Need</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>2</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total Current Need</td>
<td></td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Future Needs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on yards with temporary planning permission</td>
<td>10</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>2</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total Future Needs</td>
<td>12</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>14</td>
<td>0</td>
<td>14</td>
</tr>
</tbody>
</table>

Overall Needs for Each Authority

To provide estimates for each Local Authority, we have apportioned the needs outlined above by Local Authority on the basis of where the need currently arises or where future household growth will arise. As discussed earlier, this process inevitably places a low amount of need in areas which currently have low populations while placing higher needs in authorities with larger populations. Therefore, potentially the requirement being generated in one Local Authority could be met in a neighbouring area, but this is a Duty to Cooperate and Local Plan issue which is not to be addressed in this report.
# Blackpool

**Figure 46**

Extra plots which are required in Blackpool from 2014-2031

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply of Plots</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty plots</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Additional supply new yards</td>
<td>-</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td><strong>Current Need</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>2</td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Current Need</strong></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td><strong>Future Needs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on yards with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Future Needs</strong></td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong> <strong>2014-2031</strong></td>
<td>2</td>
<td>0</td>
<td>2</td>
</tr>
</tbody>
</table>
## Fylde

### Figure 47
**Extra Plots which are required in Fylde from 2014-2031**

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply of Plots</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty plots</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Additional supply new yards</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Current Need</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Current Need</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Future Needs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on yards with temporary planning permission</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Future Needs</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Opinion Research Services

Fylde Coast Authorities Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

September 2014

Wyre

Figure 48
Extra Plots which are required in Wyre from 2014-2031

<table>
<thead>
<tr>
<th>Reason for Requirement/Vacancy</th>
<th>Gross Requirement</th>
<th>Supply</th>
<th>Net Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supply of Plots</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional supply from empty plots</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Additional supply new yards</td>
<td>-</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Current Need</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current unauthorised developments or encampments</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Concealed households</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net movement from bricks and mortar</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Current Need</strong></td>
<td></td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>Future Needs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Currently on yards with temporary planning permission</td>
<td>10</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Net migration</td>
<td>0</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New household formation</td>
<td>2</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total Future Needs</strong></td>
<td>12</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>12</td>
<td>0</td>
<td>12</td>
</tr>
</tbody>
</table>

Split to 2031 in 5 year Time Period

In terms of providing results by time periods we have assumed that all unauthorised sites and temporary planning permissions are addressed in the first 5 years. Household formation is apportioned over time using the same method as for Gypsies and Travellers.

Figure 49
Split by Local Authority for Travelling Showpeople by Time Period to 2014-2031*

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>2014-2019</th>
<th>2019-2024</th>
<th>2024-2029</th>
<th>2029-2031</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>10</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>14</td>
</tr>
</tbody>
</table>

*To be consistent with local plan timescales across the Fylde Coast sub-region a year is taken as 1st April; to 31st March.
9. Conclusions

Introduction

9.1 This chapter brings together the evidence presented earlier in the report to provide some key policy conclusions for the Fylde Coast. It focuses upon the key issues of future site provision for Gypsies and Travellers and also Travelling Showpeople.

Gypsy and Traveller Future Residential Pitch Provision

9.2 Based upon the evidence presented in Chapter 6, the estimated extra residential pitch provision that is required for Gypsies and Travellers in the Fylde Coast over the next 17 years is 81 pitches to address local needs. The table below shows the requirements by 5 year time periods until 2031.

*To be consistent with local plan timescales across the Fylde Coast sub-region a year is taken as 1st April; to 31st March.

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>2014-2019</th>
<th>2019-2024</th>
<th>2024-2029</th>
<th>2029-2031</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>21</td>
<td>7</td>
<td>7</td>
<td>3</td>
<td>38</td>
</tr>
<tr>
<td>Fylde</td>
<td>17</td>
<td>3</td>
<td>4</td>
<td>2</td>
<td>26</td>
</tr>
<tr>
<td>Wyre</td>
<td>12</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>50</td>
<td>12</td>
<td>13</td>
<td>6</td>
<td>81</td>
</tr>
</tbody>
</table>

Travelling Showpeople Future Plot Provision

9.3 The estimated extra residential plot provision that is required for Travelling Showpeople in the Fylde Coast over the next 17 years is 14 plots to address local needs. The table below shows the requirements by 5 year time periods until 2031.

*To be consistent with local plan timescales across the Fylde Coast sub-region a year is taken as 1st April; to 31st March.

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>2014-2019</th>
<th>2019-2024</th>
<th>2024-2029</th>
<th>2029-2031</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackpool</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Fylde</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Wyre</td>
<td>10</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>14</td>
</tr>
</tbody>
</table>
# Appendix A: Existing Gypsy and Traveller Residential Sites in Fylde Coast Sub-Region

## Gypsy and Traveller Sites in Blackpool

<table>
<thead>
<tr>
<th>Site</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Authority Sites</strong></td>
<td></td>
</tr>
<tr>
<td>Chapel Road</td>
<td>26 (+ 3 transit)</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON LOCAL AUTHORITY SITES</strong></td>
<td>26</td>
</tr>
<tr>
<td><strong>Private Sites with Permanent Permission</strong></td>
<td></td>
</tr>
<tr>
<td>Fishers Lane</td>
<td>1</td>
</tr>
<tr>
<td>Parkway Stables, Jubilee Lane</td>
<td>2</td>
</tr>
<tr>
<td>Applewood, Jubilee Lane</td>
<td>2</td>
</tr>
<tr>
<td>Holmefield, Jubilee Lane</td>
<td>2</td>
</tr>
<tr>
<td>Whalley Lane</td>
<td>11</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION</strong></td>
<td><strong>18</strong></td>
</tr>
<tr>
<td><strong>Private Sites with Temporary Permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION</strong></td>
<td><strong>0</strong></td>
</tr>
<tr>
<td><strong>Tolerated Sites – Long-term without planning permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES</strong></td>
<td><strong>0</strong></td>
</tr>
<tr>
<td><strong>Unauthorised Developments</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON UNAUTHORISED DEVELOPMENTS</strong></td>
<td><strong>0</strong></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES</strong></td>
<td><strong>44</strong></td>
</tr>
</tbody>
</table>
## Gypsy and Traveller Sites in Fylde

<table>
<thead>
<tr>
<th>Site</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Authority Sites</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON LOCAL AUTHORITY SITES</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Private Sites with Permanent Permission</strong></td>
<td></td>
</tr>
<tr>
<td>The Conifers, Bambers Lane</td>
<td>6</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION</strong></td>
<td>6</td>
</tr>
<tr>
<td><strong>Private Sites with Temporary Permission</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Tolerated Sites – Long-term without planning permission</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Unauthorised Developments</strong></td>
<td></td>
</tr>
<tr>
<td>Angel Lane Caravan Park</td>
<td>15</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES ON UNAUTHOURISED DEVELOPMENTS</strong></td>
<td>15</td>
</tr>
<tr>
<td><strong>TOTAL PITCHES</strong></td>
<td><strong>21</strong></td>
</tr>
</tbody>
</table>
Gypsy and Traveller Sites in Wyre

<table>
<thead>
<tr>
<th>Site</th>
<th>Number of Pitches</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Authority Sites</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES ON LOCAL AUTHORITY SITES</strong> 0</td>
</tr>
<tr>
<td>Private Sites with Permanent Permission</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH PERMANENT PERMISSION</strong> 0</td>
</tr>
<tr>
<td>Private Sites with Temporary Permission</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES ON PRIVATE SITES WITH TEMPORARY PERMISSION</strong> 0</td>
</tr>
<tr>
<td>Tolerated Sites – Long-term without planning permission</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES ON LONG-TERM TOLERATED PRIVATE SITES</strong> 0</td>
</tr>
<tr>
<td>Unauthorised Developments (recent, but not current)</td>
<td>Blueberry Park, Lancaster Rd, Preesall - 8</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES ON UNAUTHORISED DEVELOPMENTS</strong> 8</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PITCHES</strong> 8*</td>
</tr>
</tbody>
</table>

*Of which 6 have been counted towards the need identified in this assessment
## Appendix B: Existing Travelling Showpeople Yards in Fylde Coast Area

### Travelling Showpeople Yards in Blackpool

<table>
<thead>
<tr>
<th>Yard</th>
<th>Number of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Authority Yards</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS ON LOCAL AUTHORITY YARDS</strong></td>
</tr>
<tr>
<td><strong>Private Yards with Permanent Permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS ON PRIVATE YARDS WITH PERMANENT PERMISSION</strong></td>
</tr>
<tr>
<td><strong>Private Yards with Temporary Permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS ON PRIVATE YARDS WITH TEMPORARY PERMISSION</strong></td>
</tr>
<tr>
<td><strong>Tolerated Yards – Long-term without planning permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS ON LONG-TERM TOLERATED PRIVATE YARDS</strong></td>
</tr>
<tr>
<td><strong>Unauthorised Developments</strong></td>
<td></td>
</tr>
<tr>
<td>Dickies Lane – Rear of Roseway</td>
<td>1</td>
</tr>
<tr>
<td>Dickies Lane – Midland Park</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS ON UNAUTHORISED DEVELOPMENTS</strong></td>
</tr>
<tr>
<td></td>
<td><strong>TOTAL PLOTS</strong></td>
</tr>
</tbody>
</table>
### Travelling Showpeople Yards in Fylde

<table>
<thead>
<tr>
<th>Yard</th>
<th>Number of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Authority Yards</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PLOTS ON LOCAL AUTHORITY YARDS</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Private Yards with Permanent Permission</strong></td>
<td></td>
</tr>
<tr>
<td>Chain Lane</td>
<td>2</td>
</tr>
<tr>
<td><strong>TOTAL PLOTS ON PRIVATE YARDS WITH PERMANENT PERMISSION</strong></td>
<td>2</td>
</tr>
<tr>
<td><strong>Private Yards with Temporary Permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PLOTS ON PRIVATE YARDS WITH TEMPORARY PERMISSION</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Tolerated Yards – Long-term without planning permission</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PLOTS ON LONG-TERM TOLERATED PRIVATE YARDS</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>Unauthorised Developments</strong></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL PLOTS ON UNAUTHORISED DEVELOPMENTS</strong></td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL PLOTS</strong></td>
<td>2</td>
</tr>
</tbody>
</table>
## Travelling Showpeople Yards in Wyre

<table>
<thead>
<tr>
<th>Yard</th>
<th>Number of Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Authority Yards</td>
<td></td>
</tr>
<tr>
<td>TOTAL PLOTS ON LOCAL AUTHORITY YARDS</td>
<td>0</td>
</tr>
<tr>
<td>Private Yards with Permanent Permission</td>
<td></td>
</tr>
<tr>
<td>TOTAL PLOTS ON PRIVATE YARDS WITH PERMANENT PERMISSION</td>
<td>0</td>
</tr>
<tr>
<td>Kepple Lane</td>
<td>10</td>
</tr>
<tr>
<td>TOTAL PLOTS ON PRIVATE YARDS WITH TEMPORARY PERMISSION</td>
<td>10</td>
</tr>
<tr>
<td>TOTAL PLOTS ON LONG-TERM TOLERATED PRIVATE YARDS</td>
<td>0</td>
</tr>
<tr>
<td>Unauthorised Developments</td>
<td></td>
</tr>
<tr>
<td>TOTAL PLOTS ON UNAUTHORISED DEVELOPMENTS</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL PLOTS</td>
<td>10</td>
</tr>
</tbody>
</table>
Appendix C: ORS Technical Paper on New Household Formation
HOUSEHOLD FORMATION RATES FOR GYPSIES AND TRAVELLERS

TECHNICAL NOTE

November 2013

Version 1.0
1. Household Formation Rates

Introduction

1.1 The rate of future household formations is a key component to any housing assessment, and is particularly important for Gypsy and Traveller Accommodation Assessments. The relative youthfulness of Gypsy and Traveller populations implies that they are likely to grow more quickly than the wider population and therefore will see a higher proportionate rate of new household formation.

1.2 Despite the importance of household formations in Gypsy and Traveller Accommodation Assessments, very little work has been undertaken to assess the likely rates of new formations.

History

1.3 At the outset we would note that all studies below use net household formation which is the gross household formation rate, minus any loss of households through dissolution.

1.4 In a study on behalf of 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.

1.5 In October the Department of Communities and Local Government issued guidance for conducting Gypsy and Traveller Accommodation Assessments (‘Gypsy and Traveller Accommodation Needs Assessments: Guidance’). 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.’

1.6 Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates.

1.7 A further key source of information for the use of household formation rates were Regional Spatial Strategies (RSS) which were either produced, or in production across the whole country until their planned abolition was announced in 2010. All of the RSS across the country used a household formation rate of 3% per annum for Gypsies and Travellers. However, none of the published documents (such as ‘Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009’) provide any evidence for this position. Instead the 3% simply forms part of the calculation.

1.8 Therefore, while there is precedent for using a net household formation rate of 3% per annum for Gypsies and Travellers there is little published evidence to justify this position. This document seeks to bring together all available information on household formation rates to provide a more robust position to assess the appropriate rates to use on future assessments.
Compound Growth

A net household growth rate of 3% does not imply that household numbers will double in 33 years (100/3). Instead the impact of compound growth where the 3% for any year is added to the base population and any subsequent household growth implies that the doubling of household numbers will occur much more quickly. For 3% compound growth the time it would take to double the household numbers is 23.5 years.

The table below shows the impact of a range of compound growth rates on how long they would lead to the household numbers doubling. If the growth rate was 1.5% per annum household numbers would double in 46.5 years.

Figure 1
Compound Growth Rates and Time Taken for Household numbers to Double

<table>
<thead>
<tr>
<th>Growth Rate per Annum</th>
<th>Time Taken for Household Numbers to Double</th>
</tr>
</thead>
<tbody>
<tr>
<td>3%</td>
<td>23.5 years</td>
</tr>
<tr>
<td>2.75%</td>
<td>25.5 years</td>
</tr>
<tr>
<td>2.5%</td>
<td>28 years</td>
</tr>
<tr>
<td>2.25%</td>
<td>31 years</td>
</tr>
<tr>
<td>2%</td>
<td>35 years</td>
</tr>
<tr>
<td>1.75%</td>
<td>40 years</td>
</tr>
<tr>
<td>1.5%</td>
<td>46.5 years</td>
</tr>
</tbody>
</table>

Evidence for Household Growth

A key source of quantitative information available on Gypsy and Traveller communities derives from a 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.

In January 1979, the date of the first count, there were 8,300 caravans recorded on sites across England. On the date of the most recent count in January 2013 there were 18,729 caravans counted. This equates to a rise of 126% over 34 years. This represents a rise of just over 2.4% per annum. The January 2013 count was lower than the figure for July 2012, but even using that figure sees a growth rate of 2.5% per annum.

Therefore, the number of caravans being counted on sites across England has been growing over the past 34 years at close to 2.5% per annum. There are good reasons for think that this is an overestimate of household formation rates. These include:

- There has been a significant in-migration of Irish Traveller households to England in the past 34 years. While many Irish Travellers have been established in England since before 1979, many are more recent migrants and this will have boosted caravan numbers through migration, not formations;
Many pitches across the country are sub-let or partially occupied by non Travellers. ORS has visited many hundreds of pitches across the country with non Traveller occupants. These households will again potentially boost caravan count numbers without representing a growth in the number of Gypsy and Traveller households.

Therefore ORS would consider that 2.5% represent a high end estimate of the growth in the number of caravans on sites nationally due to formations, with the real rate of growth from Gypsy and Traveller household formations being lower than this figure.

Evidence for Population Growth

There are two main sources of information for the rate of population growth for the Gypsy and Traveller community, namely the UK Census of Population 2011 and ORS’ own household survey data which includes over 2,000 face to face surveys since the start of 2012. These provide a supporting picture for the likely rate of growth among the Gypsy and Traveller population.

The ethnic status question from the UK Census of Population 2011 for the first time included Gypsy and Irish Traveller as an ethnic category. While it is accepted that non response bias has underestimated the total size of the Gypsy and Traveller population in the Census, the age profile it provides mirrors that obtained by ORS in household surveys. Therefore, there is strong reason to believe that the age profile shown in UK Census of Population 2011 is a valid reflection of the true age profile of the population.

The table below shows this age profile. Assuming that no deaths occur, for a population to double every 23.5 years (3% compound growth), half the population should be under 23.5 years and half should be over 23.5 years. In fact the midway point for the Gypsy and Traveller population is 26 years. Allowing for deaths, the number of younger people in the population must be even higher for the population to double and therefore the age profile of the Gypsy and Traveller population does not come close to doubling in 23.5 years.
Modelling Population Growth Rates

ORS undertook demographic modelling to illustrate the true likely rate of growth in the Gypsy and Traveller population. For this we used PopGroup, the leading software in population and household forecasting.

The two key inputs to the PopGroup model are birth rates and death rates. For birth rates much detailed work has been undertaken in Hungary and this has shown that for their Roma population total fertility rates (TFR) are around 3. This implies the each woman on average can be expected to have three children who reach adulthood. By comparison the TFR for the whole UK population is current just below 2. ORS have not been able to find an equivalent work for the UK Gypsy and Traveller community. The links below provide more information on the Hungarian Roma population.

http://www.romaniworld.com/cessmod01.htm

http://www.tarki.hu/adatbank-h/kutjel/pdf/a779.pdf
While not directly applicable in this case, a TFR of 3 is consistent with ORS’ survey data. This shows the average Gypsy and Traveller women aged 32 years has on average 2.5 children. From this point onwards children start to leave home, so we are not able to follow this through to a full TFR, but we have used 3 in our modelling. We would also note that the equivalent figure for a women aged 24 years in 1.5 children, which is significantly short of the number needed to double the population.

For death, the average life expectancy across the whole population of the UK is currently just over 80 years. However a report by Sheffield University found that the life expectancy of Gypsies and Travellers was 10-12 years less than this figure (Parry et al (2004) The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative, University of Sheffield). We have therefore, used an average life expectancy of 72 years in our model.

The impact of using a TFR of 3 and a life expectancy of 72 years for the Census population age profiles is that the Gypsy and Traveller population is projected to increase by 66% in the next 40 years. This equates to a growth rate of 1.25% per annum, well below 3% per annum.

In the most recent Office of National Statistics 2011 based Interim Population Projections the projected growth rate of the whole population of England to 2021 is 0.83% per annum. Of this 60% is due to natural change and 40% migration, so the rate of natural population growth in whole population of England is almost exactly 0.5% per annum. Therefore the figures modelled by ORS for Gypsies and Travellers show a population growth which is two and half times greater than for the whole population of England.

We would note that population and household growth rates do not run in parallel. The most recent Communities and Local Government 2011 based Household Projections convert these population projections to a projected household growth of 0.95% per annum. The difference between the two figures is due to the impact of an ageing population and more single older people in the population. However, this is being driven by an ageing population, while the Gypsy and Traveller population is relatively young. Therefore, a household growth figure not far in excess of 1.25% per annum is plausible and 3% is highly implausible.

Summary

Household formation rates are an important component of Gypsy and Traveller Accommodation Assessments, but little detailed work has been undertaken to assess their likely scale.

A growth rate of 3% has been commonly used in assessments, but no statistical evidence exists to support households growing this quickly. Caravan count data has shown the on-site number of caravans growing at less than 2.5% per annum and this is likely to be overstating formation rates with the national figure likely to be closer to 2% per annum.

Population modelling shows the true growth in the Gypsy and Traveller population may be as low as 1.25% per annum and this figure would be two and half times greater than the equivalent number for the settled community.

In practice the evidence supports using formation rates of between 1.5% and 2.5% per annum depending upon the relative youthfulness of the local area population. A figure of 3% net growth per annum would be exceptional and would require clear justification and statistical support before being used. In areas where an on-site survey indicates that there are few children in the population a lower figure may be used.