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Brentwood Gypsy and Traveller Accommodation Assessment



Need Summary Report

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1. Introduction

- 1.1 The primary objective of the Brentwood Gypsy and Traveller Accommodation Assessment (GTAA) Need Summary is to provide a robust revised assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation for the period 2016-2033.
- 1.2 The primary reason for completing the update was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Para 1.6 for the full definition).
- 1.3 The study provides a robust evidence base to enable the Council to assess and meet the needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act (2016). It also provides the evidence base which can be used to support Local Plan policies and development management.
- 1.4 The Brentwood GTAA is part of a wider study that covers the whole of Essex, together with Southend-on-Sea and Thurrock. Due to the complexity of this wider study, the overall Essex GTAA Report has not yet been completed. However the fieldwork has been completed for Brentwood and a final assessment of need has been undertaken. Therefore the purpose of this Need Summary is to provide the Council with a summary of the levels of need for the period 2016-2033 to provide evidence for its Local Plan.
- 1.5 It is anticipated that the final reporting framework for the wider Essex GTAA will comprise an Essex GTAA Methodology Report; individual GTAA Need Summary Reports for each of the 14 local authorities; and an Essex GTAA Summary Report that will bring together all over the final outcomes from each local authority and provide figures for Essex as a whole, as well as providing strategic recommendations on issues such as transit need.
- 1.6 The baseline date for the study is **September 2016**.

The Planning Definition in PPTS (2015)

- 1.7 For the purposes of the planning system the definition of a Gypsy, Traveller and Travelling Showperson was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

For the purposes of this planning policy “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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

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

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

For the purposes of this planning policy, “travelling showpeople” means:

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 own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 1.8 The key change that was made to both definitions was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 1.9 One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘*nomadic*’ as well as other travelling characteristics.
- 1.10 **R v South Hams District Council (1994)** – defined Gypsies as “*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 1.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 1.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 1.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought judicial review of the local authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- 1.14 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 1.15 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- 1.16 The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will **not cover** those who commute to work daily from a permanent place of residence.
- 1.17 It will also be the case that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. that the household unit would be defined as travelling under the planning definition.
- 1.18 Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled in the past. In addition households may also have to demonstrate that they plan to travel again in the future.
- 1.19 This approach was endorsed by a Planning Inspector in a recent Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267). A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

2. Methodology

Background

- 2.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible GTAAs. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in 2015 and the Housing and Planning Act (2016), as well as responding to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 2.2 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- 2.3 The approach currently used by ORS was considered in April 2016 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:

'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'

- 2.4 The stages of the methodology that was used to complete this study are set out below. More information on each stage will be provided in the full GTAA Report for the Essex Planning Officers Group.

Desk-Based Review

- 2.5 ORS collated a range of secondary data that was used to support the study. This included:
- » Census data.
 - » Site records.
 - » Caravan counts.
 - » Records of unauthorised sites/encampments.
 - » Information on planning applications/appeals.
 - » Existing Needs Assessments and other relevant local studies.
 - » Existing national and local policy

Survey of Travelling Communities

- 2.6 Through the desk-based research, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all

occupied pitches and plots. In order to gather robust information to use to assess households against the planning definition of a Traveller. Multiple visits were made to households where it was not possible to conduct an interview because they were not in or not available.

- 2.7 Our experience suggests that an attempt to interview households on all pitches is more robust, as opposed to a sample based approach which often leads to an under-estimate of need - an approach which is regularly challenged by the Planning Inspectorate and at planning appeals.
- 2.8 ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The household interview questions that were used have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the current planning definition.
- 2.9 All pitches and plots were visited by members of our dedicated team of experienced interviewers who work on GTAA studies across England and Wales. They conducted semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics (to meet the new requirements in PPTS). Interviewers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 2.10 They also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 2.11 Where it was not possible to undertake an interview, staff sought to capture as much information as possible about each pitch from sources including neighbouring residents and site management (if present).

Timing of the Fieldwork

- 2.12 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such all of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. Fieldwork was completed between January and September 2016. Whilst this did cover the summer period, the majority of interviews were not completed during July and August.

Engagement with Bricks and Mortar Households

- 2.13 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the Council, information from housing registers and other local knowledge from stakeholders, and adverts on social media (including the Friends Families and Travellers Facebook group). Through this approach we endeavoured to do everything within our means to give households living in bricks and mortar the opportunity to make their views known to us.

- ^{2.14} As a rule we do not extrapolate the findings from our fieldwork with bricks and mortar households up to the total estimated bricks and mortar population as a whole as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity we will put in place. Thus we are seeking to shift the burden of responsibility on to those living in bricks and mortar through demonstrating rigorous efforts to make them aware of the study.

Calculating Current and Future Need

- ^{2.15} 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 is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- ^{2.16} The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:
- » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within 5 years.
 - » Pitches vacated by people moving to housing.
 - » Pitches vacated by people moving from the study area (out-migration).
- ^{2.17} It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically vacant pitches on small private family sites are not included as components of available supply, but can be used to meet any current and future need arising from families living on this site.

Current Need

- ^{2.18} The second stage is to identify components of current need. It is important to address issues of double counting – for example concealed or doubled-up households may also be on a waiting list, as may households in bricks and mortar. Current need is made up of the following:
- » Households on unauthorised developments for which planning permission is not expected.
 - » Households on unauthorised encampments for which planning permission is not expected.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Households in bricks and mortar wishing to move to sites.
 - » Households in need on waiting lists for public sites.

Future Need

- 2.19 The final stage is to identify components of future need. This includes the following four components:
- » Older teenage children in need of a pitch of their own.
 - » Households living on sites with temporary planning permissions.
 - » New household formation.
 - » In-migration.
- 2.20 Household formation rates are often the subject of challenge at appeals or examinations. We firmly believe that any household formation rates should use a robust local evidence base where household interviews have been completed, rather than simply relying on precedent.
- 2.21 All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers, and for Travelling Showpeople (where present). This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified to 2033.

Pitch Turnover

- 2.22 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors' Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 2.23 In addition a GTAA Best Practice Guide was produced in June 2016 by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

^{2.24} As such, other than current vacant pitches on sites that are known to be available, or pitches identified during the fieldwork as becoming available, pitch turnover has not been considered as a component of supply in this GTAA. However the Council should continue to monitor need against pitch turnover through its usual annual monitoring processes.

Transit Provision

^{2.25} PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » Transit sites
- » Temporary/Emergency stopping places
- » Temporary (seasonal) sites
- » Negotiated Stopping Agreements

^{2.26} In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis on an Essex-wide basis of any local records of unauthorised sites and encampments (including Direction to Leave Notices), as well as information from the CLG Traveller Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring local authorities and other stakeholders that were undertaken during the previous GTAA were also taken into consideration when determining this element of need in the study area.

3. PPTS (2015) Planning Definition

3.1 The primary change introduced by PPTS (2015) in relation to the assessment of need was the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS has collected information necessary to assess each household against the planning definition. As PPTS (2015) has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes (or have ceased to travel temporarily due to education, ill health or old age), and stay away from their usual place of residence when doing so.

Applying the Planning Definition

3.2 The household interview included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:

- » Whether any household members have travelled in the past 12 months.
- » Whether household members have ever travelled.
- » The main reasons for travelling (to determine whether they travel for work purposes).
- » Where household members travel to.
- » The times of the year that household members travel.
- » Where household members stay when they are away travelling.
- » When household members stopped travelling.
- » The reasons why household members stopped travelling (to determine whether they have ceased to travel for education, ill health or old age).
- » Whether household members intend to travel again in the future (to determine whether they have ceased travelling temporarily or permanently).
- » When and the reasons why household members plan to travel again in the future (to determine whether they plan to travel for work purposes in the future).

3.3 The outcomes from these questions on travelling were used to assess the status of each household against the planning definition in PPTS (2015). Through a combination of responses households need to provide sufficient information to demonstrate that household members travel for work purposes and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.

- 3.4 Households that need to be formally considered in the GTAA fall under one of 3 classifications. Only those households that meet, or may meet, the planning definition will form the formal components of need to be included in the GTAA:
- » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily under the planning definition.
 - » Households where an interview was not possible who *may* fall under the planning definition.
- 3.5 Whilst the needs of those households that do not meet the planning definition do not now need to be formally included in the GTAA, they will be assessed to provide the Council with components of need to support their wider housing needs assessments.

Unknown Households

- 3.6 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be considered as part of the GTAA where they are believed to be Gypsies, Travellers or Showpeople who **may** meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed, an approach has been taken that seeks an estimate of potential need from these households. This will be a maximum additional need figure over and above the need identified for households that do meet the planning definition.
- 3.7 The estimate seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).
- 3.8 Should further information be made available to the Council that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or the SHMA/HEDNA.
- 3.9 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- 3.10 However, data that has been collected from over 2,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 300 interviews that have been completed) – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 3.11 ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are between

12,000-14,000 Gypsy and Traveller pitches in England and we have spoken to over 12% of them at a representative range of sites and just over 10% meet the planning definition. ORS also asked similar questions on travelling in over 2,000 pre-PPTS (2015) household interviews and also found that 10% of households would have met the PPTS (2015) planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.

3.12 The Council will need to carefully consider how to address the needs associated with unknown Travellers in Local Plan policies as it is unlikely that all of these will have a need that should be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan policies the Council could consider the use of a criteria-based policy (as suggested in PPTS (2015) Paragraph 11) for any unknown households that do provide evidence that they meet the planning definition, and also take into account the NPPF.

3.13 How the ORS methodology addresses need from unknown households was supported by the Planning Inspector for a recent Local Plan Examination in Maldon, Essex. In his Report that was published on 29th June 2017 he concluded:

150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, MM242h is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" – the whole Plan need not be reviewed.

Households that do not meet the Planning Definition

3.14 Households who do not travel or have ceased to travel permanently now fall outside the planning definition of a Traveller. However Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equality Act (2010). In addition provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance¹ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area, for example through the SHMA or HEDNA process, and will form a subset of the wider need arising from households residing in caravans.

¹ "Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats." (March 2016)

4. Survey of Travellers

Interviews with Gypsies, Travellers and Travelling Showpeople

- 4.1 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living in Brentwood.
- 4.2 Through the desk-based research ORS identified no public sites; 14 private sites (30 pitches); 1 temporary site (2 [pitches]); 2 tolerated sites (7 pitches); 3 unauthorised sites (16 pitches); or transit sites; and no Travelling Showpeople yards.
- 4.3 Interviews were completed between January and September 2016, with some follow-up interviews also completed in May 2017. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below sets out the sites/yards that were identified and visited, the number of pitches/plots, the number of interviews that were completed, and the reasons why interviews were not completed.
- 4.4 A total of 43 interviews were completed. When the pitch baseline is adjusted to take account of vacant pitches and refusals to be interviewed this represents an overall response rate of 84%.

Figure 1 – Gypsy, Traveller and Travelling Showpeople sites and yards visited in Brentwood

Site/Yard Status	Pitches/Plots	Interviews	Reasons for not completing interviews
Private Sites			
Clementines Farm	1	0	1 x no contact possible
Cottage Garden, Pilgrims Hatch	1	1	-
Deep Dell Park (Willow Farm), Ingatestone	6	5	1 x no contact possible
Lilliputs, Blackmore	2	3	-
Meadow View, Blackmore	2	2	-
Pond End, Kelvedon Hatch	1	0	1 x vacant
Ponderosa, Kelvedon Hatch	1	0	1 x no contact possible
Poplar Farm, Ingatestone	2	0	2 x no contact possible
Roman Triangle, Mountnessing	5	5	-
Rye Etch, Navestock	3	3	-
The Willows', Kelvedon Hatch	1	0	1 x no contact possible
Tree Tops, Navestock	3	1	2 x no contact possible
Warren Lane, Doddinghurst	1	0	1 x no contact possible
Wenlock Meadow	1	1	-
Temporary Sites			
The Willows', Kelvedon Hatch	2	2	-
Tolerated Sites			

Hope Farm, Navestock	3	0	2 x refusals, 1 x no contact possible
Orchard View, Navestock	4	3	1 x no contact possible
Unauthorised Sites			
Greenacres, Blackmore	9	8	3 x no contact possible
Hunters Green, Navestock	1	1	-
Lizvale Farm, Navestock	6	6	-
TOTAL	55	41	

Efforts to contact bricks and mortar

- 4.2 ORS applied a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the Council and local housing providers, and adverts on social media (including the Friends Families and Travellers Facebook group).
- 4.3 At the time of concluding this report no contacts had been identified to interview.

5. Current and Future Pitch Provision

- 5.1 This section focuses on the additional pitch provision which is needed in Brentwood currently and to 2033. This includes both current unmet need and need which is likely to arise in the future. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies completed by ORS, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 5.2 We would note that this section is based upon a combination of the on-site surveys, planning records and discussions with Officers from the Council. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.

PPTS (2015) Planning Definition

- 5.4 As well as assessing housing need PPTS (2015) requires a GTAA to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the planning definition of a Gypsy, Traveller or Travelling Showperson. Only households that fall within the planning definition, and those who *may* meet the planning definition (households where an interview was not completed), will have their housing needs assessed separately from the wider population in the GTAA. The planning definition now excludes those who have ceased to travel permanently.

New Household Formation Rates

- 5.5 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix B**.
- 5.6 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in the Traveller Caravan Count. However this data is very unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 5.7 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find

evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

- 5.8 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers. This view has been supported by Planning Inspectors in a number of Decision Notices. The most recent was in relation to an appeal in Doncaster (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used. The Inspector concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.5% but that a 2.5% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.5% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.5% figure is justified in the case of Doncaster.

- 5.9 In addition the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit. It aims to encourage methodological development by giving practitioners the space and the incentive to share their knowledge – see link below.

<http://the-sra.org.uk/journal-social-research-practice/>

- 5.10 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the baseline includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates.
- 5.11 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence. This demographic evidence from the household interviews has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 in each local authority (by planning status).
- 5.12 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.

- 5.13 Research by ORS has also identified a national growth rate of 1.00% for Travelling Showpeople and this has also been adjusted locally based on site demographics.
- 5.14 The outcomes in Brentwood are that new household formation for Gypsies and Travellers who meet the planning definition has used a rate of 1.40% (national rate adjusted downwards as a lower proportion are aged under 18); a rate of 1.85% for Gypsy and Traveller households that do not meet the planning definition (national rate adjusted upwards as a higher proportion are aged under 18); and the national rate of 1.50% has been used for unknown households.

Breakdown by 5 Year Bands

- 5.15 In addition to tables which set out the overall need for Gypsies, Travellers and Travelling Showpeople, the need has also been broken down by 5 year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from older teenage children, and net movement from bricks and mortar) in the first 5 years. Total net new household formation is split across the 5 year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the Planning Definition

- 5.16 The outcomes from the questions in the household survey on travelling were used to assess each household against the planning definition in PPTS (2015). This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether and why they plan to travel again in the future. This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the planning definition.
- 5.3 Figure 2 shows that for Gypsies and Travellers 9 household meet the planning definition in that it was able to be determined that they travel for work purposes and stay away from their usual place of residence, or have ceased to travel temporarily. A total of 32 Gypsy and Traveller households did not meet the planning definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.
- 5.4 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this included households that refused to be interviewed and households that were not present during the fieldwork period – despite up to 3 visits.

Figure 2 – Planning status of households in Brentwood

Site Status	Meet Planning Definition	Unknown	Do Not Meet Planning Definition	TOTAL
Private Sites	7	9	14	30
Temporary Sites	0	0	2	2
Tolerated Sites	0	4	3	7
Unauthorised Sites	2	3	13	18
TOTAL	9	16	32	57

Pitch Needs – Gypsies and Travellers that meet the Planning Definition

- 5.5 The households who meet the planning definition were found on 5 private sites and 2 unauthorised sites. Analysis of the household interview identify that there is need for 2 additional pitches that are currently unauthorised, 3 additional pitches for concealed or doubled-up households or single adults, 2 additional pitches for teenage children in need of a pitch of their own in the next 5 years, and 4 additional pitches through new household formation using a rate of 1.40% based on the demographics of those who were interviewed. There is no supply from vacant pitches.
- 5.6 Therefore the overall level of additional need for those households who meet the planning definition of a Gypsy or Traveller is for **11 additional pitches** over the GTAA period to 2033.

Figure 3 – Additional need for Gypsy and Traveller households in Brentwood that meet the Planning Definition (2017-2033)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches to be vacated by households moving to bricks and mortar	0
Pitches to be vacated by households moving to another area	0
Total Supply	0
Current Need	
Households on unauthorised developments	2
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	3
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	5
Future Need	
5 year need from older teenage children	2
Households on sites with temporary planning permission	0
In-migration	0
New household formation	4
<i>(Household base 14 and formation rate 1.40%)</i>	
Total Future Needs	6
Net Pitch Total = (Current and Future Need – Total Supply)	11

Figure 4 – Additional need for Gypsy and Traveller households in Brentwood that meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	8	1	1	1	11

Pitch Needs – Unknown Gypsies and Travellers

- 5.7 Whilst it was not possible to determine the planning status of a total of 16 households as they were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and **may** meet the planning definition.
- 5.8 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 5.9 However data that has been collected from over 2,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the planning definition.
- 5.10 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 5.11 Should further information be made available to the Council that will allow for the planning definition to be applied to the unknown households, the overall level of need could rise by up to 5 pitches from new household formation (this uses a base of the 16 households and a net growth rate of 1.50%²), and by 3 pitches that are currently unauthorised. Therefore additional need *could* increase by up to a further 8 pitches, plus any concealed adult households or 5 year need arising from older teenagers living in these households (if all 16 unknown pitches are deemed to meet the planning definition). However, as an illustration, if the ORS national average of 10% were to be applied this could be as few as 1 additional pitch. Tables setting out the components of need for unknown households can be found in **Appendix A**.

Gypsies and Travellers that do not meet the Planning Definition

- 5.12 It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition. However this assessment is included for illustrative purposes and to provide the Council with information on levels of need that will have to be addressed through the SHMA or HEDNA and through separate Local Plan policies. On this basis, it is evident that whilst the needs of the 32 households who do not meet the planning definition will represent only a very small proportion

² The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as some identified as Romany Gypsies.

- 5.13 The 32 households live on 6 private sites, 1 temporary site, 1 tolerated site and 2 unauthorised sites. Analysis of the site interviews has identified a need of 13 from unauthorised pitches, 2 from pitches with temporary planning permission, 11 from concealed or doubled-up households or single adults, 13 from older teenage children in need of a pitch of their own in the next 5 years and 20 from new household formation using a rate of 1.85% based on the demographics from the households that were interviewed. Therefore the total additional need is for 59 pitches over the GTAA period to 2033.
- 5.14 A summary of this need can be found in **Appendix A**.

Plot Needs – Travelling Showpeople

- 5.15 There were no Travelling Showpeople identified in Brentwood so there are no current or future accommodation needs.

Transit Requirements

- 5.16 When determining the potential need for transit provision the assessment has looked at data from the DCLG Traveller Caravan Count, the outcomes of the stakeholder interviews and local records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

DCLG Caravan Count

- 5.17 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Caravan Count is a count of caravans and not households or pitches/plots. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 5.18 Data from the Caravan Count shows that there have been low numbers of non-tolerated unauthorised caravans on land not owned by Travellers recorded in Brentwood in recent years – recorded only during the summer months.

Stakeholder Interviews and Local Data

- 5.19 Information from the stakeholder interviews that were completed for the previous GTAA that was published in 2014 also confirmed that there are low levels of unauthorised encampments and that the majority were during the summer months, short-term visiting family or friends, transient and simply

passing through. Stakeholders reported short-term summertime encampments on the coast at Holland Marshes, or on the Seafront Gardens. The vans stay for a few days and then move on. . In addition information collated by ECTU has recorded a total of 45 unauthorised encampments in Brentwood since 2013.

Potential Implications of PPTS (2015)

- 5.20 It has been suggested by a number of organisations and individuals representing the Travelling Community that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling seeking to meet the planning definition. This may well be the case but it will take some time for any changes to become apparent. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS (2015) evidence base and there has not been sufficient time yet for this to be developed.

Transit Recommendations

- 5.21 Whilst there is historic evidence to suggest the need for some form of transit provision in Brentwood (and Essex), it is not recommended that any should be provided at this point in time as the robustness of the data which could indicate this is not considered to be sufficient. It is recommended that the situation relating to levels of unauthorised encampments should continue to be monitored whilst any potential changes associated with PPTS (2015) develop, and also to allow detailed analysis of Decision to Leave Notices on an Essex-wide basis. Brentwood Council is therefore recommended to engage, through the Duty to Cooperate, with the other Essex authorities in the future to ensure this work on transit sites can be completed.
- 5.22 As well as information on the size and duration of the encampments, the monitoring should also seek to gather information from residents on the reasons for their stay in Brentwood; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in Brentwood; and whether their travelling is a result of changes to PPTS (2015). This information could be collected as part of a Welfare Assessment (or equivalent).
- 5.23 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above and analysis of Decision to Leave Notices should be undertaken over the next 12 months. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, where this provision needs to be located, or whether a managed approach is preferable.
- 5.24 In the short-term the Council should consider the use of existing management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.
- 5.25 The term ‘negotiated stopping’ is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

^{5.26} Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold water supply; portaloos; sewerage disposal point and refuse disposal facilities.

6. Conclusions

- 6.1 This study provides an robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016. It also provides the evidence base which can be used to support Local Plan policies.

Gypsies and Travellers

- 6.2 In summary there is a need for **11 additional pitches** in Brentwood over the GTAA period to 2033 for Gypsy and Traveller households that meet the planning definition; a need for up to 8 additional pitches for Gypsy and Traveller households that may meet the planning definition – although if the ORS national average of 10% were to be applied this could be as few as no additional pitches; and a need for 59 additional pitches for Gypsy and Traveller households who do not meet the planning definition – if the potential need from 90% of unknown households is added to this the total need for non-Travelling households could rise to 66 additional pitches. A breakdown of where this need should be addressed is set out in the table below.

Figure 5 – Additional need for Gypsy and Traveller households broken down by potential delivery method

Site Status	Gypsy and Traveller Local Plan Policy	SHMA Housing Policy	TOTAL
Meet Planning Definition (+ 10% Unknown)	12	0	12
Not meeting Planning Definition (+ 90% Unknown)	0	66	66
TOTAL	12	66	78

Travelling Showpeople

- 6.3 There were no Travelling Showpeople identified in Brentwood so there is no current or future need for additional plots.

Transit Provision

- 6.4 Whilst there is historic evidence to suggest the need for some form of transit provision in Brentwood (and Essex), it is not recommended that any should be provided at this point in time as the robustness of the data which could indicate this is not considered to be sufficient. It is recommended that the situation relating to levels of unauthorised encampments should continue to be monitored whilst any potential changes associated with PPTS (2015) develop, and also to allow detailed analysis of 'Decision to Leave Notices' on an Essex-wide basis. Brentwood Council is therefore recommended to engage,

through the Duty to Cooperate, with the other Essex authorities in the future to ensure this work on Transit Sites can be completed. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.

- ^{6.5} In the short-term the Council should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments, as opposed to taking forward an infrastructure-based approach.

Appendix A – Need from unknown and households that do not meet the Planning Definition

Additional need for unknown Gypsy and Traveller households in Brentwood (2016-33)

Gypsies and Travellers - Unknown	Pitches
Supply of Plots	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	3
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	3
Future Need	
5 year need from older teenage children	0
Households on sites with temporary planning permission	0
In-migration	0
New household formation	5
<i>(Household base 16 and formation rate of 1.50%)</i>	
Total Future Needs	5
Net Pitch Total = (Current and Future Need – Total Supply)	8

Additional need for unknown Gypsy and Traveller households in Brentwood by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	4	1	2	1	8

Additional need Gypsy and Traveller households in Brentwood that do not meet the Planning Definition (2016-33)

Gypsies and Travellers – Not Meeting New Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	13
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	11
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	24
Future Need	
5 year need from older teenage children	13
Households on sites with temporary planning permission	2
In-migration	0
New household formation	20
<i>(Household base 56 and formation rate 1.85%)</i>	
Total Future Needs	35
Net Pitch Total = (Current and Future Need – Total Supply)	59

Additional need for Gypsy and Traveller households in Brentwood that do not meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	44	6	6	3	59

Appendix B – ORS Technical Note on Household Formation and Growth Rates



Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University



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Household Growth Rates

Abstract and conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments – even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.
2. Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).
3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum – a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.
4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.
5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a ‘margin’ if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

Introduction

6. The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities’ future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

7. In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished *gross* and *net* growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' *net* growth rates of about 3% without sufficiently recognising either the range of factors impacting on the *gross* household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.
8. For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, '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').
9. However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying 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. [In footnote 6, page 25]
10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.
11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

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.'

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% *net* growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a *net* compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

Household Growth Rate per Annum	Time Taken for Household to Double
3.00%	23.5 years
2.75%	25.5 years
2.50%	28 years
2.25%	31 years
2.00%	35 years
1.75%	40 years
1.50%	46.5 years

14. The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

Household Growth Rate per Annum	5 years	10 years	15 years	20 years	50 years	100 years
3.00%	116	134	156	181	438	1,922
2.75%	115	131	150	172	388	1,507
2.50%	113	128	145	164	344	1,181
2.25%	112	125	140	156	304	925
2.00%	110	122	135	149	269	724
1.75%	109	119	130	141	238	567
1.50%	108	116	125	135	211	443

15. In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

Caravan counts

16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site – which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.
17. However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.
18. ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

Date	Number of caravans	5 year growth in caravans	Percentage growth over 5 years	Annual over last 5 years.
Jan 2015	20,123	1,735	9.54%	1.84%
July 2014	20,035	2,598	14.90%	2.81%
Jan 2014	19,503	1,638	9.17%	1.77%
July 2013	20,911	3,339	19.00%	3.54%
Jan 2013	19,359	1,515	8.49%	1.64%
Jul 2012	19,261	2,112	12.32%	2.35%
Jan 2012	18,746	2,135	12.85%	2.45%
Jul 2011	18,571	2,258	13.84%	2.63%
Jan 2011	18,383	2,637	16.75%	3.15%
Jul 2010	18,134	2,271	14.32%	2.71%
Jan 2010	18,370	3,001	19.53%	3.63%
Jul 2009	17,437	2,318	15.33%	2.89%
Jan 2009	17,865	3,503	24.39%	4.46%
Jul 2008	17,572	2,872	19.54%	3.63%
Jan 2008	17,844	3,895	27.92%	5.05%

Jul 2007	17,149	2,948	20.76%	3.84%
Jan 2007	16,611	2,893	21.09%	3.90%
Jul 2006	16,313	2,511	18.19%	3.40%
Jan 2006	15,746	2,352	17.56%	3.29%
Jul 2005	15,863	2,098	15.24%	2.88%
Jan 2005	15,369	1,970	14.70%	2.78%
Jul 2004	15,119	2,110	16.22%	3.05%
Jan 2004	14,362	817	6.03%	1.18%
Jul 2003	14,700			
Jan 2003	13,949			
Jul 2002	14,201			
Jan 2002	13,718			
Jul 2001	13,802			
Jan 2001	13,394			
Jul 2000	13,765			
Jan 2000	13,399			
Jan 1999	13,009			
Jul 1998	13,545			

19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.
20. However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)
21. There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

Modelling population growth

Introduction

22. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

Population profile

24. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
25. The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years – so the population could not possibly double in 23.5 years.

Table 4

Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9

Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

Birth and fertility rates

26. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)
27. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, ‘Ethnic identity and inequalities in Britain: The dynamics of diversity’ by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community
28. ORS’s have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

29. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

30. However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.
31. Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

Modelling outputs

32. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.
33. There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum – meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.
34. The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

Household growth

35. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).
36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
37. Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5

Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

38. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

Household Type	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

39. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).
40. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.
41. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

Household dissolution rates

42. Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

Area	Annual projected household dissolution	Number of households	Percentage
Greater London	25,000	3,266,173	0.77%
Blaenau Gwent	468.2	30,416	1.54%
Bradford	3,355	199,296	1.68%
Ceredigion	348	31,562	1.10%
Exeter, East Devon, Mid Devon, Teignbridge and Torbay	4,318	254,084	1.70%
Neath Port Talbot	1,352	57,609	2.34%
Norwich, South Norfolk and Broadland	1,626	166,464	0.98%
Suffolk Coastal	633	53,558	1.18%
Monmouthshire Newport Torfaen	1,420	137,929	1.03%

43. The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

Summary conclusions

44. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.
45. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

46. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.
47. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a ‘margin’ if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.