

Great Yarmouth and Broads Authority Gypsy, Traveller & Residential Caravans Accommodation Assessment

Report
June 2022

RRR Consultancy Ltd



GREAT YARMOUTH
BOROUGH COUNCIL



Broads
Authority

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Executive Summary

Introduction

- S1. This Gypsy, Traveller & Residential Caravans Accommodation Assessment (GTRCAA) was commissioned by Great Yarmouth Borough Council and the Broads Authority. As such, the study area consists of the whole of the Great Yarmouth Borough Council area, which includes part of the planning area covered by the Broads Authority (see Figure 1). The results will be used as an evidence base for policy development in housing and planning and updates the accommodation needs for Great Yarmouth Borough Council and the Broads Authority for Gypsies, Travellers and residential caravan dwellers. The base date for the GTRCAA is 2022.
- S2. The requirement to assess the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan dwellers are established through national guidance contained in [‘Planning Policy for Traveller Sites’](#) (DCLG, 2015) and the Housing and Planning Act (2016). Throughout the report this policy will be referred to as PPTS 2015 or simply PPTS. There are no Showpeople on yards in the study area and no evidence of need for Showpeople accommodation yards. As such, the GTRCAA assesses the accommodation needs of Gypsies, Travellers and residential caravans.
- S3. To achieve the study aims, the research drew on a number of data sources including:
- Review of secondary information: a review of national and local planning policies and recently undertaken GTRCAAs, and analysis of secondary data. This included analysis of the most recently published (July 2021) Department of Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers¹.
 - Consultation with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan providers.
 - Site visits and consultation with Gypsies and Travellers covering a range of issues related to accommodation and service needs.

Policy context

- S4. In August 2015, the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for

¹ Please note that due to Covid-19 restrictions the Traveller Count did not take place in July 2020 or January 2021.

planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.

- S5. This needs assessment (GTRCAA) provides two need figures in relation to the accommodation needs for Gypsies and Travellers: first, one based on the ethnic identity definition i.e. all households who ethnically identify as Gypsies and Travellers; and second, based on the needs of families who have *not* permanently ceased to travel (i.e. based on the PPTS 2015 definition). It does so in relation to each of the local planning authorities in the study area.
- S6. Local planning policies including the [Great Yarmouth Local Plan Part 2](#) (2021) and [Broads Authority Local Plan 2015-2036](#) determine the criteria for meeting the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The updated evidence provided by the 2022 GTRCAA will help determine whether the local planning policies will need to be revised.

Population Trends

- S7. The 2011 Census suggests there were 64 Gypsies and Travellers residing in the study area representing about 0.06% of the total population. The 2011 Census records a total of 24 Gypsy and Traveller households residing within the study area who mainly own the accommodation or reside in the social rented sector. The DLUHC July 2021 Count shows that there were 24 Gypsy and Traveller caravans located in the study area. The number of caravans per 100,000 population recorded in Great Yarmouth was 24 compared with an average of 53 per 100,000 population in Norfolk.
- S8. DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. On average, there were 42 caravans recorded on unauthorised pitches between January 2016 to July 2021 in Norfolk, but none in the study area.

Stakeholder Consultation

- S9. Consultation with stakeholders (service providers) provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers and Travelling Showpeople within the study area and neighbouring authorities. The aim of this section of the assessment was to consider the views of service providers regarding accommodation needs within and surrounding the study area.

- S10. The stakeholder consultation offered important insights into the main issues faced by the travelling community within the county. It was generally acknowledged that there is a lack of both permanent and transit accommodation provision. Also, some existing sites are in need of investment and upgrading to meet current standards. Social rented pitches, particularly those on larger sites, are not desirable to all households due to poor conditions and a preference to own pitches rather than pay rent. It was suggested that the main drivers of accommodation need are the need for younger people in existing households requiring future separate accommodation, and accommodation need arising from households residing in bricks and mortar accommodation wanting a pitch.
- S11. Key barriers to new accommodation provision noted by stakeholders included: a lack of suitable or affordable land; competing interests for suitable land; a lack of finance; and the complexity of planning processes. It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Also, land in more rural locations is more likely be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites although larger sites can be difficult to manage a lead to conflict between families.
- S12. According to stakeholders, a high proportion of accommodation need in the study area derives from unauthorised developments. There is land close to the local site (within the Broads Authority planning area) that over recent years became occupied by both Gypsy and Traveller, and non-Gypsy and Traveller households (residential caravan dwellers), as well as businesses. Over recent years households have purchased land and settled on the site. Previously, Gypsy and Traveller households used the site as a base whilst they travelled but are increasingly settling permanently on the site.
- S13. Gypsies and Travellers tend to reside in caravans due to cultural practice. However, members of the settled community may reside in caravans for life-style reasons or due to a lack of alternative affordable accommodation. Stakeholders commented on how Great Yarmouth has always been a popular place for people to live and holiday in caravans. They also commented on how there is a growing demand for caravans as a more cost-effective means for housing, and as an accommodation that more people are choosing.
- S14. Stakeholders commented on how there is an increase in both residential and holiday let caravan sites in the area. From consultation with stakeholders, and visits to the authorised site and potential unauthorised developments, it was estimated that there are 12 households residing on unauthorised developments within the Broads Authority area of Great Yarmouth. There are also an estimated 23 households permanently residing in caravans on private land and on pitches registered for holiday and touring provision within the Great Yarmouth area.

- S15. According to stakeholders, few unauthorised encampments occur in the study area. Those that do occur tend to be households on holiday or visiting family members who reside on sites or in bricks and mortar accommodation. During the household survey period there were no households residing on unauthorised encampments with need for permanent accommodation.
- S16. The two Gypsy and Traveller Liaison Officers who manage the local authority site help families to access services and with health and educational needs. For example, in relation to Covid-19, they worked closely with households on the local authority site and the neighbouring unauthorised developments to access support including promoting vaccine take-up and Covid-19 testing.

Consultation with households

- S17. Consultation was undertaken with Gypsy and Traveller households, key stakeholders (in particular the Norwich & Eastern Showmen's Guild to confirm that there are no Showpeople households residing on yards in the study area), and site managers and owners. The combination of local authority data, site / yard visits, and consultation with households and key stakeholders helped to clarify the status of pitches and plots i.e. which provisions are occupied, vacant, overcrowded, and occupied by household members with accommodation needs. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including site and yard owners and managers, neighbours, and relatives) was undertaken, some of which was undertaken over the telephone.

Accommodation need

- S18. Accommodation need in relation to Gypsies and Travellers residing in the study area was assessed using analysis of primary and secondary data. The accommodation needs calculation steps were based on a model in accordance with both previous (2007) and current Practice Guidance (2015) issued by the Department of Communities and Local Government (DCLG). Although the 2007 guidance was withdrawn in 2016, it remains useful as a model to determine accommodation needs. It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data. The model has been used in all GTAA's previously undertaken by *RRR Consultancy Ltd* and found robust and reliable with examples including: Central Lincolnshire (2013 and 2020), Derbyshire and East Staffordshire (2015), South Kesteven and Rutland (2016), Rugby (2019), Stratford on Avon (2019), and Bassetlaw (2019).
- S19. Tables S1 and S2 summarise the accommodation need of Gypsies and Travellers over a 19-year period. It is important to note that the figures shown in the tables include all need as of 2022, including any which may have been identified by previous GTAA's but remained unfulfilled by February 2022. Tables S1 and S2 show that a further 18 Gypsy and Traveller pitches (based on the ethnic identity definition), or 16 pitches (based on PPTS 2015) are

needed in both the Broads Authority and Great Yarmouth areas respectively over the 19-year period.

Gypsies and Travellers

Broads Authority

Table S.1: Summary of accommodation needs 2022-41 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
2022-2027	7	6
2027-2032	1	1
2032-2037	1	1
2037-2041	1	1
2022-2041	10	9

Source: GTRCAA 2022

Great Yarmouth

Table S.2: Summary of accommodation needs 2022-41 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
2022-2027	2	1
2027-2032	2	2
2032-2037	2	2
2037-2041	2	2
2022-2041	8	7

Source: GTRCAA 2022

- S20. There are no Travelling Showpeople households residing on yards in the study area and no need for additional accommodation over the period 2022-2041.

Transit provision

- S21. Although there is currently a transit site consisting of 6 pitches in the study area, it has mainly been used by Gypsy and Traveller households waiting for permanent pitches on the local authority site to become available. The need for further transit provision could be met by the implementation of a negotiated stopping policy.
- S22. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that all of local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or countywide basis.

Residential caravans

- S23. Unlike Gypsies and Travellers, residential caravan dwellers are not considered to be an ethnic minority and, as such, are not protected by the [Equality Act 2010](#). However, [Government guidance \(March 2016\)](#) and [paragraph 124 of the Housing and Planning Act 2016](#) indicates that local authorities should consider the accommodation needs of residential caravan dwelling households. Table S3 shows that there is a need for 70 additional residential pitches in the study area over the period 2022-41.

Table S3: Summary of accommodation needs 2022-41 (residential caravan pitches)					
	2022-27	2027-32	2032-37	2037-41	2022-41
Broads Authority	12	0	0	0	12
Great Yarmouth	43	5	5	5	58
Total	55	5	5	5	70

Conclusions

- S24. It is recommended that the local planning authorities seek to meet the PPTS need (as required) with 'ethnic' need covered by a criteria-based policy. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also able to demonstrate how accommodation needs for those who do not meet the PPTS definition are being addressed. The local authorities could adopt the accommodation needs as determined by the PPTS 2015 definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the local planning authorities would firstly meet the need of 15 (6 within the first 5 years) but accept the need of a further 1 pitch (1 within the first 5 years) as potential need if further applications are brought forward through windfalls. It is important to note that this only refers to Gypsies and Travellers and not to Travelling Showpeople, or non-Gypsy and Traveller residential dwellers, as the latter two are not considered to be an ethnic group. In relation to residential caravans there is a need for 70 additional pitches.
- S25. It is also recommended that the local planning authorities incorporate into their local plans a criteria-based policy which takes into consideration any planning applications that might materialise over the plan period from households not considered by this assessment. This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified in this report and could be met through windfall applications.
- S26. In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:

- In relation to Gypsies and Travellers and Travelling Showpeople it is recommended that the local authorities work closely with the families to determine how their accommodation need can best be met.
- Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.

S27. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

Planning policy:

- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites or yards.
- To consider alternative options for developing new sites and yards such as developing them on a cooperative basis, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller, and Showpeople communities.
- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups), to review its current, historic and potential planning status, and review the most effective way forward.
- To consider safeguarding Gypsy, and Traveller people sites with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

Management:

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.

- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies in relation to Gypsy and Traveller, Travelling Showpeople and boat dweller communities.
- During the ongoing implications of Covid-19 impacting the communities, determine help and support the local authorities and other services could provide to the households
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change. As such, their accommodation needs should be reviewed every 5 to 7 years.

1. Introduction

Study context

- 1.1 This report details the findings from the Great Yarmouth and Broads Authority Gypsy, Traveller & Residential Caravans Accommodation Assessment (GTRCAA). The report was commissioned by Great Yarmouth Council and the Broads Authority. As such, the study area consists of the whole of the Great Yarmouth Borough Council area, which includes that part of the planning area covered by the Broads Authority (see Figure 1). It determines the accommodation needs of Gypsies, Travellers, Travelling Showpeople, and residential caravan dwellers up to 2041. The results will be used as an evidence base for policy development in housing and planning and updates any evidence regarding accommodation needs in the study area determined by previous GTAA (including any accommodation need calculated prior to this assessment). The base date for the GTRCAA is February 2022.
- 1.2 The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in [Planning Policy for Traveller Sites](#) (DCLG, 2015) (referred to in this report as PPTS) and the requirement to assess the need for residential caravans is set in the [Housing and Planning Act \(2016\)](#). There are no Showpeople on yards in the study area and no evidence of need for Showpeople accommodation yards, therefore the study focuses on the needs of Gypsies and Travellers and residential caravan dwellers.

Methodology

- 1.3 To achieve the study aims, the research drew on a number of data sources including:
- Review of secondary information: a review of national and local planning policies and recently undertaken GTRCAAs, and analysis of secondary data. This included analysis of the most recently published (July 2021) Department of Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers².
 - Consultation with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan providers.
 - Site visits and consultation with Gypsies and Travellers covering a range of issues related to accommodation and service needs.

² Please note that due to Covid-19 restrictions the Traveller Count did not take place in July 2020 or January 2021.

- 1.4 The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs. The consultation was undertaken in a Covid-19 safe manner i.e. it followed government guidance and restrictions. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including site and yard owners and managers, neighbours, and relatives) was undertaken, some of which was undertaken over the telephone.

Geographical context of Great Yarmouth and the Broads Authority

Great Yarmouth

- 1.5 The estimated 2022 population of the Great Yarmouth Borough area is 100,794 people (ONS 2018). The Borough of Great Yarmouth is situated on the east coast of Norfolk, adjacent to the North Sea, with part of the Great Yarmouth area being covered by the Broads. The borough covers 17,000 hectares including 24 kilometres of coastline, productive farmland and environmentally important wetlands. The largest settlement in the borough is the town of Great Yarmouth, which is located at the mouth of the River Yare and has a resident population of approximately 28,500 (ONS 2018). Great Yarmouth is the principal centre in the borough for retail, services and employment, including port related activities.
- 1.6 The borough's economy is dominated by three major industries: energy and engineering, port and logistics, and tourism, all of which make an important contribution to the sub-regional, regional and national economy. Locally based energy companies have access to a significant amount of commercial expertise and a 24-hour port that provides the main supply base for the offshore gas industry in the Southern Basin of the North Sea and for offshore windfarms. There is also a small but leading-edge cluster of high-tech electronics and engineering companies. With regards to the visitor economy, Great Yarmouth is one of the most popular coastal resorts in the UK with around 5 million visitors per year. The borough offers a wide range of attractions, facilities and accommodation types for visitors to enjoy. Great Yarmouth is also one of the gateways to the Broads where visitors can enjoy recreational pursuits such as walking, cycling, sailing, angling and bird-watching³.
- 1.7 Within the borough there is one trunk road, the A47 running from Acle through Great Yarmouth to the centre of Lowestoft. The A47 is the main strategic route linking Suffolk to the Midlands and the north (westbound). The road is largely single carriageway, resulting in slow and unreliable journeys. The main trunk roads connect to the north of the borough via the A149 which runs through the northern parishes of Ormesby St Margaret and Rollesby towards Cromer and along the North Norfolk Coast. The A1064 leads through the northern parishes of Filby and Fleggburgh on to Acle. To the south-west of the borough the main roads

³ [Great Yarmouth Core Strategy 2013-2030](#) adopted December 2015.

leading out of Great Yarmouth connect to the A143 through to Bradwell and Belton, and towards Beccles.

The Broads

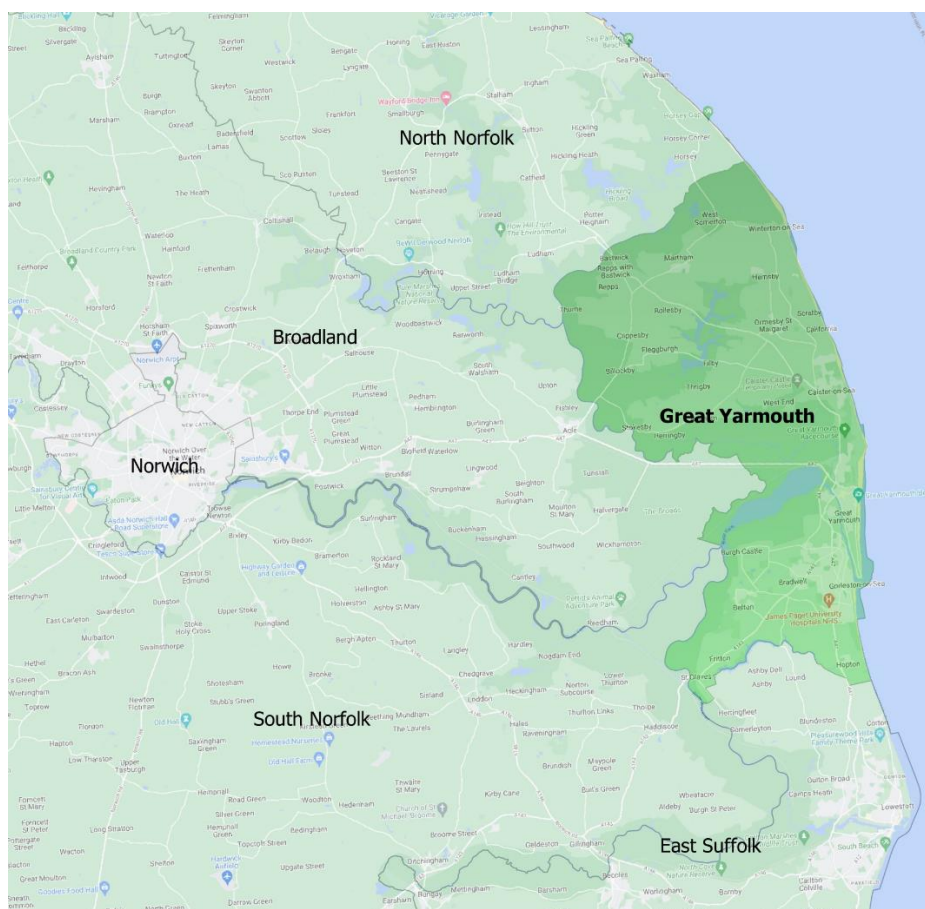
- 1.8 The Broads is an internationally important wetland and designated protected landscape of the highest order with a status equivalent to that of a National Park. The designated Broads Authority Executive Area covers parts of Norfolk and North Suffolk. The Executive Area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council area. The councils for those areas do not have planning powers in the Broads area, but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authority for their respective part of the Broads, with responsibilities that include minerals and waste planning and are also the Lead Local Flood Authority.
- 1.9 The Broads Authority is a Special Statutory Authority, established under the Norfolk and Suffolk Broads Act 1988. It has a statutory duty to manage the Broads for three purposes, none of which takes precedence:
- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
 - Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
 - Protecting the interests of navigation.
- 1.10 A primary aspect of the Broads is that it is a nationally designated area, protected and enhanced for the benefit of the nation as well as for the local population and businesses. This is the justification for control of local planning within the designated area to be entrusted to a special purpose body that includes representation of the national interest as well as of local councils and navigators.
- 1.11 Tourism is the mainstay of the Broads' economy. In 2015, the Broads and surrounding area (including the area of influence) received around 7.4 million visitors, bringing an estimated £431 million and directly supporting more than 7,200 FTE jobs. Land and water-based tourism is important in the area with around 12,173 boats on the Broads in 2015 (10,691 private craft and 1,482 hire craft). Many people also enjoy bird watching, walking, cycling, angling, visiting heritage sites and just being near the water.
- 1.12 The local economy is not entirely tourism related. Agriculture is the predominant business use in terms of land area, if not in numbers employed or monetary value, and has a vital role

in maintaining the landscape and its aesthetic and environmental value. Boat building is also a locally important traditional industry⁴.

Map of the study area

- 1.13 A map of the study area is shown below. Please note that the Great Yarmouth local authority area is shaded in dark green whilst neighbouring authorities are shaded in light green.

Figure 1: Study area



Source: ONS boundary data 2022

Summary

- 1.14 Planning Policy for Traveller Sites (PPTS) (August 2015) and the Housing and Planning Act (2016) reiterate the need for local authorities to evidence the accommodation needs of Gypsies and Travellers and to determine the number, type and location of new provision.

⁴ Local Plan for the Broads Plan period 2015 – 2036, Adopted May 2019, pp.7-9.

- 1.15 The purpose of this assessment is to quantify the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan dwellers in the study area to 2041 with February 2022 as the base date. This is in terms of permanent pitches/plots, sites/yards, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers and Travelling Showpeople. The results will be used as an evidence base for policy development in housing and planning.
- 1.16 To achieve the study aims, the research drew on several data sources including: a review of secondary information; consultation with organisations involved with Gypsy and Traveller, and Travelling Showpeople, and extensive surveys of the traveller groups. These provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

2. Policy context

Introduction

- 2.1 To assess the current policy context, existing national and local planning policy and guidance documents discussed below have been examined to determine what reference is made to Gypsy and Traveller, Travelling Showpeople and residential caravan dweller issues.
- 2.2 The intention is to summarise key national and local policies and examine the findings of GTRCAAs recently undertaken by neighbouring authorities. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation need and housing related support need among Gypsies and Traveller, Travelling Showpeople and residential caravan dwellers.

National Policies

National Planning Policy Framework

- 2.3 The [National Planning Policy Framework](#) (July 2021) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. The Framework should be read in conjunction with the Government's planning policy for traveller sites. It states that a five-year supply of deliverable sites for Travellers – as defined in Annex 1 to [Planning Policy for Traveller Sites](#) (August 2015) – should be assessed in line with the policy in that document.

DCLG Planning Policy for Traveller Sites (PPTS) (August 2015)

- 2.4 In August 2015 the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Show People. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:
 - effectively engage with traveller communities
 - co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas
 - and use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions

- 2.5 There are some key differences between the March 2012 and August 2015 versions of the PPTS. One important amendment relates to the change in the definitions of Gypsies, Travellers, and Travelling Showpeople. The August 2015 PPTS changed the definition to exclude households who have permanently ceased to travel – in effect, for planning purposes, PPTS 2015 regards such households as members of the settled community.

Definition Context

- 2.6 In August 2015, the DCLG amended its definition of Gypsies and Travellers⁵, as set out below:

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 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 resuming a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

- 2.7 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority. Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority⁶.

- 2.8 According to DCLG (August 2015) guidance on planning policy for traveller sites, the definition of Travelling Showpeople is:

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.⁷

⁵ DCLG, Planning Policy for Traveller Sites, August 2015.

⁶ DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

⁷ DCLG, *Planning Policy for Traveller Sites*, August 2015.

- 2.9 Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAA's), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It recommends that Travelling Showpeople's own accommodation needs and requirements should be separately identified in the GTAA⁸. To ensure it is following DCLG guidance, this GTRCAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG 'Planning Policy for Traveller Sites' (August 2015) (see above).
- 2.10 It is important to note that Gypsies and Travellers and Travelling Showpeople have separate accommodation need requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. As well as space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.

*DCLG Review of housing needs for caravans and houseboats: draft guidance (March 2016)*⁹

- 2.11 In March 2016 DCLG published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances, for example:
- Caravan and houseboat dwelling households:
 - who have no authorised site anywhere on which to reside
 - whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation
 - who contain suppressed households who are unable to set up separate family units and
 - who are unable to access a place on an authorised site, or obtain or afford land to develop their own site.
 - Bricks and mortar dwelling households:
 - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

⁸ DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.

⁹ See <https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance>. Although it remains in draft form, correspondence to RRR Consultancy from the MHCLG dated 17 May 2021 confirms that the government remains committed to finalising the guidance.

- 2.12 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Travellers, and Travelling Showpeople.
- 2.13 The DCLG draft guidance (2016) recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:
- their nomadic or semi-nomadic pattern of life
 - their preference for caravan and houseboat-dwelling
 - movement between bricks-and-mortar housing and caravans or houseboats
 - their presence on unauthorised encampments or developments.
- 2.14 Also, it suggests that as mobility between areas may have implications for carrying out an assessment local authorities will need to consider:
- co-operating across boundaries both in carrying out assessments and delivering solutions
 - the timing of the accommodation needs assessment
 - different data sources
- 2.15 Finally, the DCLG draft guidance (2016) states that in relation to Travelling Showpeople account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.

Housing and Planning Act 2016

- 2.16 [The Housing and Planning Act](#), which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.

Local Planning Policies

Great Yarmouth Local Plan Part 2 (2021)

2.17 The [Great Yarmouth Local Plan Part 2](#) (adopted December 2021) amends policy CS5 of the Core Strategy (2013-2030) which outlines the Council's policy regarding Gypsies, Travellers, and Traveling Showpeople. The Council will:

- a) Safeguard the existing travellers site at Gapton Hall (24 pitches) for use by Gypsies and Travellers, and explore opportunities for the reconfiguration and/or extension of the site to meet identified needs.
- b) Use a 'plan, monitor and manage' approach, based on the Annual Monitoring Report and updates of the Strategic Housing Land Availability Assessment, to ensure the continuous maintenance of a five-year rolling supply
- c) Ensure that in identifying land or determining planning applications, proposals for potential sites/pitches comply with national policy in the Planning Policy for Traveller Sites document or successor publications and seek to meet the following criteria:
 - The site has good, safe access to the public highway system, with adequate space for parking, turning and servicing on site
 - The site has reasonable and safe access to key community facilities such as schools, shops and healthcare facilities
 - The site is well-designed and based on guidance in the 'Designing Gypsy and Traveller Sites' document or successor documents
 - The development of the site minimises potential impacts on the surrounding townscape, landscape, including the Broads and the Norfolk Coast Area of Outstanding Natural Beauty, heritage assets, geodiversity, biodiversity and high grade agricultural land
 - The site is not in an area at risk of flooding
 - The site has adequate disposal of sewage to ensure that there is no reduction in water quality within the catchment
 - Suitable waste and recycling facilities are provided
- d) Seek to ensure that sites are made available on a temporary basis for Travelling Showpeople, as and when they are required
- e) The Council commits to an immediate review of the evidence in relation to the needs of Gypsies, Travellers and Travelling Showpeople following adoption of the Local Plan Part 2 as part of the Local Plan Review.

(Local Plan Part 2 2021 p.13)

Broads Authority Local Plan 2015-2036 (adopted May 2019)

2.18 According to Policy DM36 of the [Local Plan](#) ('Gypsy, Traveller and Travelling Showpeople') development proposals for the provision of permanent or transit accommodation, or temporary stopping places, to meet the needs of Gypsies and Travellers, and Travelling Showpeople will be supported where they meet an identified need. However, development proposals that would have an adverse impact on the special qualities of the Broads will be refused. Where there is a proven need, appropriate development will be allowed where the following criteria are met:

- a) Avoid sites being over-concentrated in any one location or disproportionate in size to nearby communities
- b) Well related to existing settlements, services and facilities and do not harm the character and appearance of the area
- c) Within reasonable distances to facilities and supporting services
- d) There are no severe residual impacts on the safe and efficient operation of the highway network
- e) There is adequate provision for parking, turning and safe manoeuvring of vehicles within the site
- f) Transit sites should be in close proximity to the main established travelling routes in the area
- g) Have clearly defined physical boundaries and will be appropriately screened and landscaped and be capable of visual privacy
- h) The site will not have harm the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape
- i) Permanent built structures in rural locations or on settlement fringes are restricted to essential facilities
- j) There is sufficient amenity space for occupiers
- k) The design, layout and density of the site are based on Government guidance in 'Designing Gypsy and Traveller Sites' (or successor documents)
- l) Sites or pitches are capable of being provided with adequate infrastructure such as power, water supply, foul water drainage and recycling/waste management
- m) Proposals do not cause unacceptable harm to the amenity of neighbouring uses and occupiers and the tranquillity of the area
- n) Due regard has been given to all types of flood risk; and
- o) Sites are not proposed which will adversely impact on protected species, priority habitats and designated wildlife sites.

2.19 It further states that transit or temporary sites may have conditions applied relating to length of occupancy in consultation with the Housing Authority.

Duty to cooperate and cross-border issues

- 2.20 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.
- 2.21 Local authorities are required to work together to prepare and maintain an up-to-date understanding of their housing needs for their areas, for example the likely needs of gypsy, travellers and other permanent residential caravan dwellers. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.
- 2.22 As part of this assessment consultation in relation to Gypsies, Travellers and Travelling Showpeople was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in detail in Chapter 4.
- 2.23 Given the transient nature of Gypsies and Travellers it is important for the GTRCAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section discusses the results of GTAA's recently undertaken by neighbouring and nearby local authorities specifically in relation to accommodation need and travelling patterns.

Norfolk GTAA 2017

- 2.24 The 2017 GTAA assessed the accommodation needs in relation to the Broads Authority, Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council). For the period 2017-2036, it found a need of 5 additional Gypsy and Traveller pitches in relation to the planning area of Great Yarmouth, and no accommodation needs for Gypsies and Travellers in relation to the planning area covered by the Broads Authority. The GTAA found no need for additional Travelling Showpeople plots in either the Great Yarmouth or Broads Authority planning areas, although it did find a need for an additional 38 residential caravan pitches up to 2036 in the Great Yarmouth planning authority area.
- 2.25 This 2022 assessment supersedes the 2017 assessment in relation to the accommodation needs of Gypsies and Travellers, Travelling Showpeople, and residential caravan dwellers in the Great Yarmouth Borough area (including the area of the Borough where the Broads Authority is the planning authority). The Broads Authority is undertaking a separate assessment in relation to the accommodation needs of boat dwellers for the whole of its area (also being undertaken by *RRR Consultancy* and due to be published later in 2022).

*Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney ANA (2017)*¹⁰

- 2.26 According to the 2017 ANA, the estimated extra site provision that is required between 2016 and 2036 is 73 pitches (1 pitch in Babergh, 27 in Ipswich, 9 in Mid Suffolk, 15 in Suffolk Coastal, and 21 in Waveney). This includes existing households on unauthorised sites, those with temporary planning permissions, and the growth in household numbers due to household formation. Any sites in the pipeline for development have not been included in this figure. The report also identified a need for 3 different 8 pitch transit sites or emergency stopping places to help to manage unauthorised encampments and provide for visiting households. The report also identifies a need for 9 additional Travelling Showpeople plots (0 plots in Babergh, 0 in Ipswich, 7 in Mid Suffolk, 2 in Suffolk Coastal, and 0 in Waveney), and 28 residential boat moorings (10 moorings in Babergh, 0 in Ipswich, 0 in Mid Suffolk, 17 in Suffolk Coastal, and 1 in Waveney).

Summary

- 2.27 DCLG Planning Policy for Traveller Sites (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers, and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.28 Local planning policies including the Great Yarmouth Local Plan Part 2 (2021) and Broads Authority Local Plan 2015-2036 determine the criteria for meeting the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The updated evidence provided by the 2022 GTRCAA will help determine whether the local planning policies will need to be revised.
- 2.29 Given the cross-boundary characteristic of accommodation issues, it is important to consider the findings of GTAAAs produced by neighbouring local authorities. GTAAAs recently undertaken by neighbouring local authorities indicate that there remains Gypsy, Traveller, and Travelling Showpeople accommodation need throughout the region.

¹⁰ Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney Gypsy, Traveller & Travelling Showpeople Accommodation Assessment, October 2013.

3. Trends in the population levels

Introduction

- 3.1 This section examines population levels in the GTRCAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the DLUHC on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation need.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of tourer and static caravans, so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches / households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The DLUHC Count includes data concerning both Gypsies and Travellers sites¹¹. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from January 2016 to July 2021.

¹¹. Data regarding Travelling Showpeople are published separately by the MHCLG as 'experimental statistics'.

Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people¹². There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks and mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the MHCLG. Due to Covid-19 restrictions the Count did not take place in July 2020 or January 2021. The [July 2021 Count](#) (the most recent figures available) indicate a total of 24,203 caravans. Applying an assumed three person per caravan¹³ multiplier would give a population of 72,609 persons.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing,¹⁴ gives a total population of 145,218 persons for England. However, given the limitations of the data this figure can only be very approximate, and may be a significant underestimate.
- 3.9 Please note that whilst there are no specific Caravan Count figures in relation to the Broads Authority, it is likely that their potential figures are captured within the respective district-based surveys (such as Great Yarmouth). As such, the following data analysis only relates to Great Yarmouth and neighbouring local authorities. For the first time, the national census undertaken in 2011 included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. Table 3.1 below shows the total population and Gypsy and Traveller population per Norfolk local authority as derived from the 2011 Census. It shows that in 2011 there were 64 Gypsies and Travellers residing in the study area (i.e. Great Yarmouth and the Broads Authority combined) representing around 0.06% of the usual resident population.¹⁵ This is lower than the averages for both the East of England (0.14%) and England (0.10%). The proportion of Gypsies and Travellers recorded in relation to each local planning authority varied widely with only 0.02% of the population of the Broads Authority recorded as Gypsies or Travellers, compared with 0.17% in King's Lynn & West Norfolk¹⁶.

¹² House of Commons 'Tackling inequalities faced by Gypsy, Roma and Traveller communities' April 2019 located at: www.parliament.uk

¹³ Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

¹⁴ Ibid.

¹⁵ See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

¹⁶ The 2011 Census figures will be superseded by the 2021 Census figures which are due to be published early summer 2022.

Table 3.1 Gypsy and Traveller Population			
	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Broads Authority	6,271	1	0.02%
Breckland	130,491	204	0.16%
Broadland	124,646	44	0.04%
Great Yarmouth	97,277	63	0.06%
King's Lynn & West Norfolk	147,451	255	0.17%
North Norfolk	101,499	46	0.05%
Norwich	132,512	127	0.10%
South Norfolk	124,012	183	0.15%
East of England	5,846,965	8,165	0.14%
England	53,012,456	54,895	0.10%

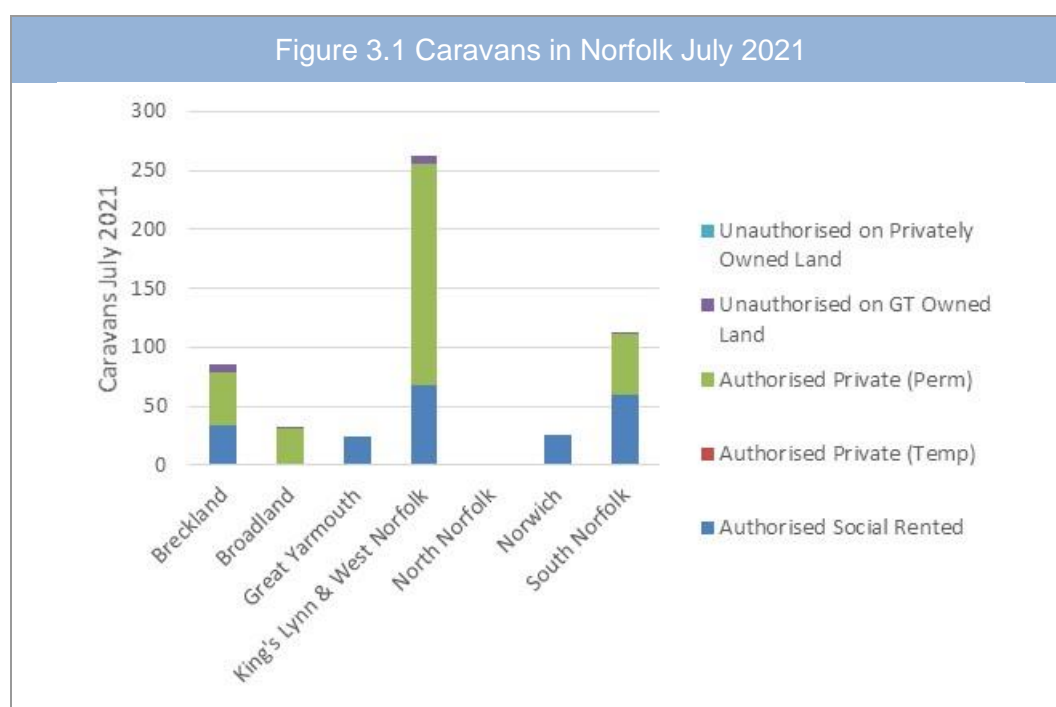
Source: 2011 Census in NOMIS 2022 and ONS 2013

- 3.10 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2011 Census data, Table 3.2 shows the tenure of 363 Gypsy and Traveller households residing in Norfolk. This includes households residing both on sites and in bricks and mortar accommodation. Half (50%) of all Gypsy and Traveller households in Great Yarmouth were recorded as owning the accommodation they reside in, compared with a third (33%) residing in social rented accommodation, and the remainder (17%) residing in private rented accommodation.

Table 3.2 Gypsy and Traveller households – tenure								
	Social Rented		Owned		Private Rented		Total	
	No.	%	No.	%	No.	%	No.	%
Breckland	30	48%	24	39%	8	13%	62	100%
Broadland	15	68%	4	18%	3	14%	22	100%
Great Yarmouth	8	33%	12	50%	4	17%	24	100%
King's Lynn & W. Norfolk	57	52%	31	28%	22	20%	110	100%
North Norfolk	3	17%	4	22%	11	61%	18	100%
Norwich	15	29%	31	60%	6	12%	52	100%
South Norfolk	35	47%	36	48%	4	5%	75	100%
Total	163	45%	142	39%	58	16%	363	100%
East of England	1,065	38%	1,209	43%	554	20%	2,828	100%
England	6,518	33%	8,162	42%	4,778	25%	19,458	100%

Source: 2011 Census in NOMIS 2022

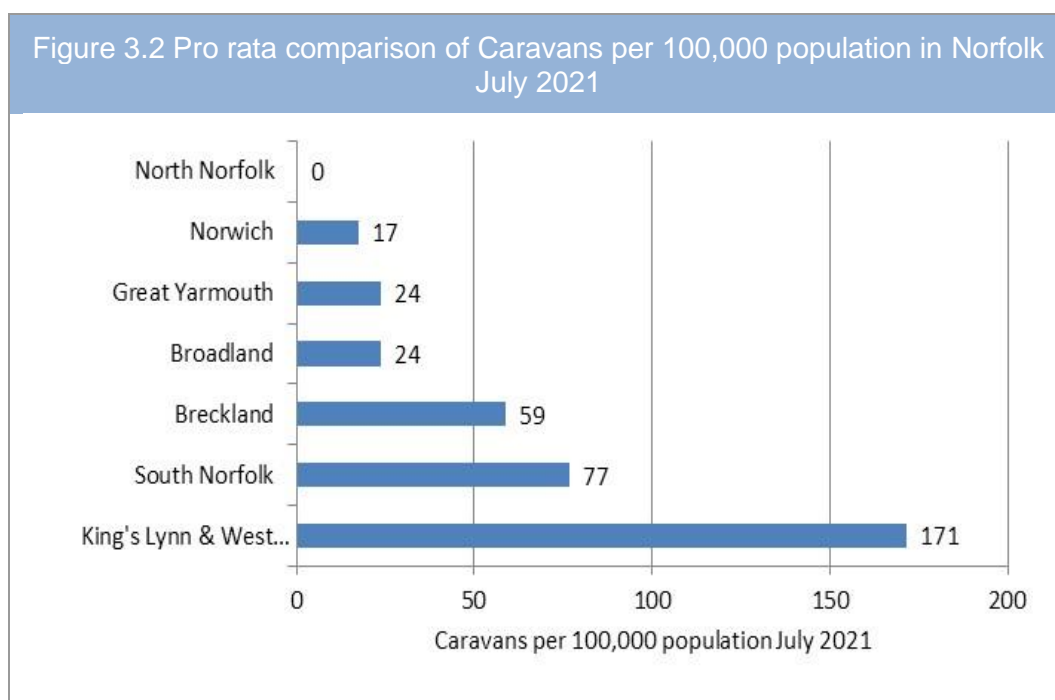
- 3.11 Figure 3.1 below shows the July 2021 Caravan Count in relation to Norfolk local authorities. A total of 542 caravans were recorded in the county including 314 caravans recorded on privately owned pitches, 211 on social rented pitches¹⁷, 17 on unauthorised pitches without planning permission, and none on pitches with temporary planning permission. In relation to the study area 24 pitches were recorded on social rented pitches in Great Yarmouth. Please note that no caravans were recorded in North Norfolk in July 2021.



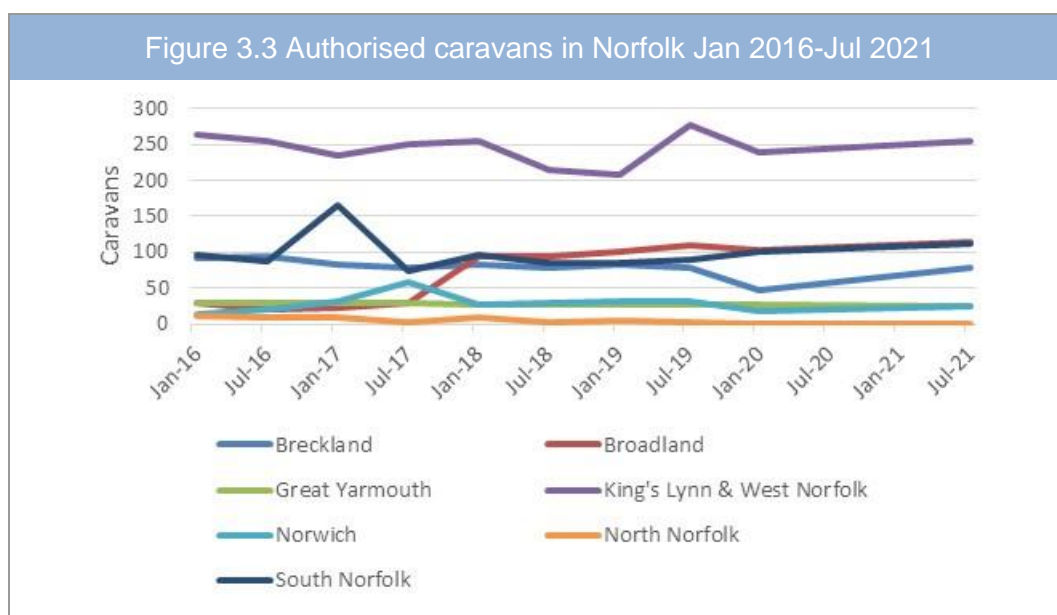
Source: July 2021 DLUHC Traveller Caravan Count

- 3.12 Figure 3.2 shows that when the population is taken into account the density of caravans in Norfolk varies with an average of 24 caravans per 100,000 population recorded in Great Yarmouth compared with none in North Norfolk, 17 in Norwich, 24 in Broadland, 59 in Breckland, 77 in South Norfolk, and 171 in King's Lynn and West Norfolk.

¹⁷ This includes caravans recorded on a site of 18 pitches owned by the local authority but managed by a leaseholder.



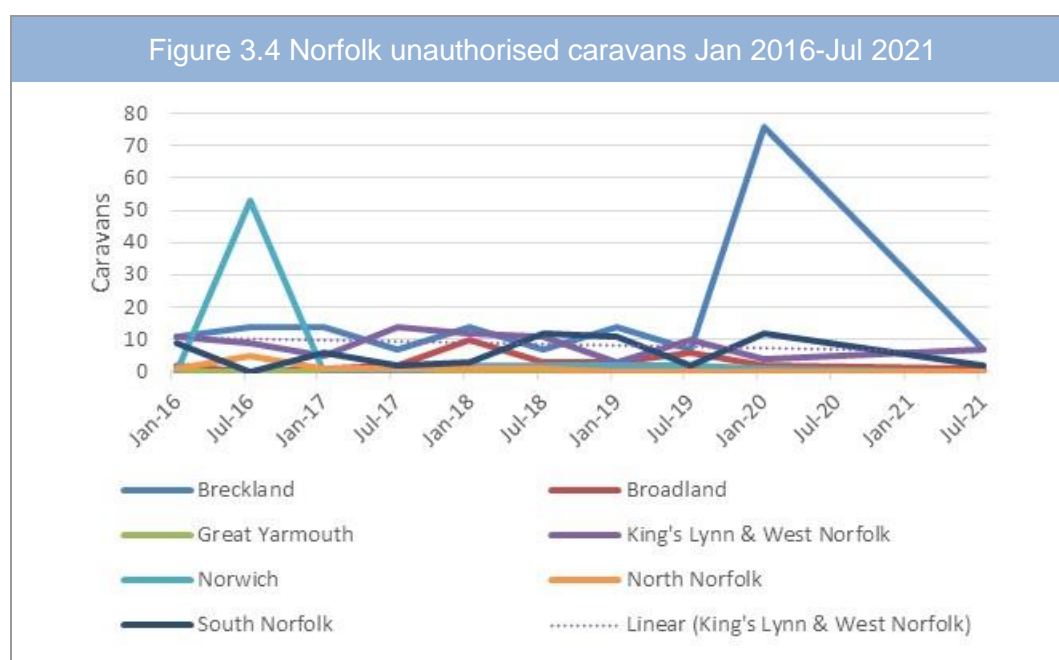
- 3.13 Figure 3.3 shows that the total number of caravans in Norfolk on authorised pitches recorded by the DLUHC Traveller Count over the period January 2016 to July 2021. The DLUHC recorded a total of 536 caravans located on authorised pitches in January 2016 compared to 608 caravans in July 2021. In relation to Great Yarmouth, the number of caravans recorded by the Traveller Count has been steady with 30 recorded in January 2016 compared with 24 in July 2021.
- 3.14 On average, just over two fifths (42%) of caravans recorded by the July 2021 DLUHC count in Norfolk were in King's Lynn & West Norfolk, compared with Broadland (19%), South Norfolk (18%), Breckland (13%), Great Yarmouth (4%), Norwich (4%), and North Norfolk (0%).



Source: July 2021 DLUHC Traveller Caravan Count

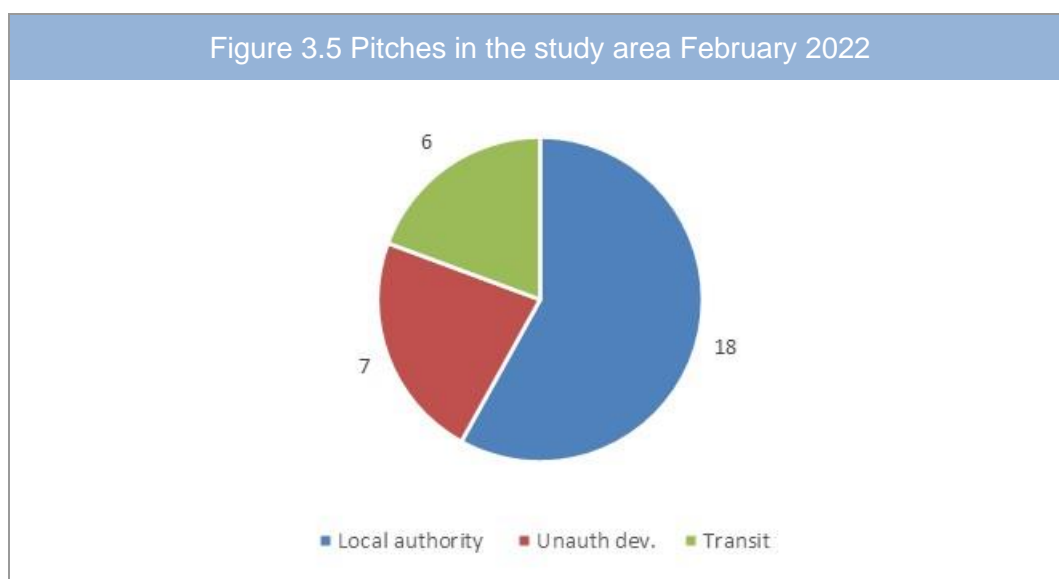
Data on unauthorised encampments

3.15 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. Figure 3.4 shows the number of caravans recorded on unauthorised pitches in Norfolk over the period January 2016 to July 2021. Excluding 'outliers' (i.e. an unusual occurrence) of 76 unauthorised caravans occurring in Breckland in January 2020 and 53 caravans recorded in Norwich in July 2016, on average, there were 42 caravans recorded on unauthorised caravans recorded between January 2016 to July 2021 with just over two fifths (41%) being recorded in Breckland, just over a fifth (21%) in King's Lynn & West Norfolk, and around a seventh (15%) in Norwich and South Norfolk (14%). Very few were recorded in Broadland (7%) or North Norfolk (2%), and none (0%) in Great Yarmouth. However, it should be noted that Covid-19 restrictions may have led to fewer caravans being recorded on unauthorised pitches in July 2021.



Permanent residential pitches within the study area

3.16 As Figure 3.5 shows, in February 2022, there were 18 permanent authorised Gypsy and Traveller pitches on the local authority owned and managed Gapton Hall, Great Yarmouth sites, and 6 transit pitches (there are no known authorised private pitches in the study area). 3 of the 18 pitches on the local authority site are currently occupied by non-Gypsies and Travellers who aim to move out of the study area within the first five-year period. There are also 7 pitches on unauthorised developments (i.e. pitches without planning permission) located in the Broads Authority area (close to the Gapton Hall site). The Broads Authority, prior to this assessment were aware of these and other pitches at Blackgate Farm and on Cobholm Island. According to the council, for the unauthorised pitches at Blackgate Farm, enforcement action, upheld at appeal is underway. For Cobholm Island, the Broads Authority are undertaking a review of the occupancy and status of the pitches at the time of finalising this report.



Source: GTRCAA study area local planning authorities

Travelling Showpeople

- 3.17 There are no known Showpeople yards in the area. All known Showpeople households in the study area reside in bricks and mortar accommodation, or travel from outside the study area to host events. The study area does contain have some storage yards. However, based on council data and confirmed by the Showmen's Guild and the British Circus Association, there are no current or planned yards for living quarters in the study area. As such, there is no evidenced need for new yards.

Residential Caravans

- 3.18 From consultation stakeholders combined with local authority data it is estimated that there are 453 permanent authorised (i.e. pitches with planning permission and licensed for permanent residential caravan use) within the study area.
- 3.19 Stakeholders commented on how there an increase in has been both residential and holiday let caravan sites in the study area over recent years. From consultation with stakeholders, and visits to the potential sites on and around the Cobholm Island area (including Blackgate Farm), it was estimated that there are 12 households residing on unauthorised developments within the Broads Authority area of Great Yarmouth. There are also an estimated 23 households permanently residing in caravans on private land and on pitches registered for holiday and touring provision within the Great Yarmouth area.

Summary

- 3.20 The 2011 Census suggests there were 64 Gypsies and Travellers residing in the study area representing about 0.06% of the total population. The 2011 Census records a total of 24 Gypsy and Traveller households residing within the study area who mainly own the accommodation or reside in the social rented sector. The DLUHC July 2021 Count shows that there were 24 Gypsy and Traveller caravans located in the study area. The number of caravans per 100,000 population recorded in Great Yarmouth was 24 compared with an average of 53 per 100,000 population in Norfolk.
- 3.21 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. on average, there were 42 caravans recorded on unauthorised pitches between January 2016 to July 2021 in Norfolk, but none in the study area. In February 2022, there were 18 authorised local authority owned and managed Gypsy and Traveller pitches (15 occupied by Gypsies and Travellers, and 3 by non Gypsies and Travellers), 7 pitches on unauthorised developments (2 at Blackgate Farm and 5 on Cobholm Island), and 6 transit pitches.
- 3.22 The figures for Gypsy and Traveller, and residential caravans pitches within the Broads Authority areas are based upon estimations of unauthorised developments. The Broads Authority are seeking to clarify the number of pitches on Cobholm Island and whom they are occupied by. This will lead to an addendum to this study which will confirm the number and occupancy of pitches.
- 3.23 There are an estimated 453 permanent authorised residential pitches within the study area. Qualitative evidence indicates that there has been an increase in both residential and holiday let caravan sites in the study area over recent years.

4. Stakeholder consultation

Introduction

- 4.1 Consultations with a range of stakeholders were conducted to provide qualitative information about the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan dwellers (completed February 2022). The aim of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the study area. In recognition that Gypsy and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers from neighbouring authorities, as well as from within the study area.
- 4.2 Themes included: the need for additional provisions and facilities; travelling patterns; the availability of land; accessing services; and work taking place to meet the needs of Gypsy, Traveller and Travelling Showpeople. This chapter highlights the main points that were raised. Please note that the below reflects the views of stakeholders and not necessarily the views of the report authors. Also, that the comments may relate to areas outside of the study area.

Accommodation needs

Gypsies and Travellers

- 4.3 It was generally acknowledged that there is a lack of accommodation provision throughout the county. This is in terms of both permanent and transit provision. Also, some existing sites are in need of investment and upgrading to meet current standards. It was suggested that some Gypsy and Traveller families often 'get by' by travelling on the road, using transit sites, and residing in bricks and mortar accommodation.
- 4.4 It was suggested that the main drivers of accommodation need are the need for younger people in existing households requiring future separate accommodation, and new accommodation needs arising from households residing in traditional bricks and mortar accommodation wanting a pitch. It was noted that some Gypsy and Traveller households have unsuccessfully attempted to reside in bricks and mortar accommodation. This has resulted in the households being located on unauthorised encampments.
- 4.5 Low tolerance to unauthorised encampments often leads to them being displaced to neighbouring districts. Also, households residing on unauthorised encampments often have poorer life-chances, and health and educational outcomes compared with households residing on permanent sites. Two short-stay sites in Breckland and South Norfolk have recently closed. According to a stakeholder from a neighbouring authority, the management of their main Gypsy and Traveller site has been transferred over to the local authority. They are exploring the potential for the site to expand to meet accommodation need up to 2030.

- 4.6 In recent years the local authority site in Great Yarmouth has changed management. In 2017 it was managed by the Norfolk & Suffolk Gypsy, Roma and Traveller Service, having previously been managed by a local Gypsy and Traveller family on behalf of the council. Since February 2021 Great Yarmouth Council (owners of the site) took over its management. It employs two Gypsy and Traveller Liaison officers who, as part of their roles, manage the site. The local authority are considering options for expanding and improving the site.
- 4.7 At the time of the previous 2017 GTAA most of the local authority site occupants were non-Gypsies and Travellers. Since then, non-Gypsy and Traveller households have left the site meaning that it is now mainly occupied by Gypsy and Traveller households. The remaining non-Gypsy and Traveller households are expected to leave the site within the next two years.
- 4.8 Currently, there are only communal shower and toilet blocks rather than individual household utility blocks as preferred by the site occupants. However, Great Yarmouth Borough Council is considering options for improving site conditions. This includes improving site services such as the improving the electricity supply, as well as water and sewage services, and pest control (including dealing with rat infestation).
- 4.9 A high proportion of accommodation need in the study area derives from unauthorised developments in relation to the Broads Authority area. There is land at Cobham Island, close to the local site (within the Broads Authority planning area), that over recent years has become occupied by both Gypsy and Traveller, and non-Gypsy and Traveller households, as well as businesses. Over recent years households have purchased land and settled in the area. Previously, Gypsy and Traveller households used the area as a base whilst they travelled, but are increasingly settling permanently within the area (both in and around the Cobham Island area). The Broads Authority commented on how there is an ongoing investigation at Blackgate Farm and on Cobholm Island area in relation to the occupancy of pitches.

Travelling Showpeople

- 4.10 There are currently no Travelling Showpeople plots or yards in the study area. Since the 2017 GTAA was undertaken, no new need for permanent or transit provision has arisen in relation to Travelling Showpeople. There have been no recorded unauthorised Travelling Showpeople encampments over the previous 15-20 years. The Showmen's Guild confirmed that there are no accommodation yards in the study area. Travelling Showpeople families operate events and funfairs in the study area including some along the Great Yarmouth seafront. As such, some storage yards in the study area are used by Travelling Showpeople. However, these are not used for accommodation and the Travelling Showpeople households reside in houses.

Residential Caravans

- 4.11 Gypsies and Travellers tend to reside in caravans due to cultural practice. However, members of the settled community may reside in caravans for life-style reasons or due to a lack of alternative affordable accommodation. Stakeholders commented on how Great

Yarmouth has always been a popular place for people to live and holiday in caravans. They also commented on how there is a growing demand for caravans as a more cost-effective means for housing, and as an accommodation that more people are choosing.

- 4.12 Stakeholders commented on an increase in both residential and holiday let caravan sites in the study area. They also commented how there is an estimated 12 households residing on unauthorised developments within the Broads Authority area of Great Yarmouth. There are also an estimated 23 households permanently residing in caravans on private land and on pitches registered for holiday and touring provision within the Great Yarmouth area. The Broads Authority are seeking to clarify the number of pitches on Cobholm Island and whom they are occupied by.

Barriers to Accommodation Provision

- 4.13 Key barriers to new accommodation provision noted by stakeholders included: a lack of suitable or affordable land; competing interests for suitable land; a lack of finance; and the complexity of planning processes. For example, the complexities involved, and lack of knowledge about, the planning system, as well as associated costs, may discourage some people from submitting an application. Also, some planning applications are rejected due to errors. It must be borne in mind that the high rates of illiteracy amongst the Gypsy and Traveller community may make it more difficult for members of the community to submit planning applications (although some employ planning agents in order to assist with the process).
- 4.14 It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers, Travelling Showpeople and residential caravan residents. The process of identifying suitable land was deemed problematic. Land suitable for the development of new sites and yards tends to be too expensive for local Gypsy and Traveller households and is more likely to be used for the development of residential properties. This often leaves small parcels of land for the development of new sites which are not always in locations suitable for the development of new sites. Also, land in more rural locations is more likely to be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites although larger sites can be difficult to manage and lead to conflict between families. According to one stakeholder, this has led to the unauthorised developments occurring in the Broads Authority planning area, close to the Great Yarmouth site.
- 4.15 Stakeholders acknowledged political barriers to new sites. In particular, national planning policy was regarded as encouraging a negative attitude to new provision. The need to evidence 'travelling' weighs heavily in the determination of planning applications leading to planning applications for new sites being refused. There can also be local opposition to the development or extension of sites.

Transit provision and travelling patterns

- 4.16 According to one stakeholder, most unauthorised encampments in the county arise from families that have local roots. Some households may have permanent pitches or alternative accommodation but travel for cultural reasons. There are a small number of Gypsy and Traveller households who travel for economic reasons who may be reluctant to use transit accommodation and prefer to reside close to areas of work. The six transit pitches in Great Yarmouth have mainly been used on a permanent basis by Gypsy and Traveller households waiting on the local authority site to become available.
- 4.17 Reasons cited by stakeholders for the occurrence of unauthorised encampments in the county included: a lack of permanent and transit provision; households unable to reside in bricks and mortar accommodation; households locating close to work; an unwillingness to pay for transit accommodation; households travelling for cultural reasons; as a means of being prioritised for accommodation; and due to travelling to attend events such as fairs. The preference of some households is to locate where they can generate an income, close to economic and residential hubs with good transport links. Few families will share a transit site with anyone they do not know. Transit sites may be used on a semi-permanent basis by a single family.
- 4.18 According to stakeholders, few unauthorised encampments occur in the study area. Those that do occur tend to be households on holiday or visiting family members who reside on sites or in bricks and mortar accommodation. During the household survey period there were no households residing on unauthorised encampments with need for permanent accommodation.
- 4.19 Gypsy and Traveller households on unauthorised encampments may not seek accommodation at a transit site unless directed by the local authority or police. However, transit sites are important as they enable local authorities or police to direct households on unauthorised encampments to them. It was suggested that Planning Policy for Traveller Sites (PPTS) (2015) has led to a reduction in the number of new sites and a subsequent increase in unauthorised encampments. The Norfolk & Suffolk Gypsy, Roma and Traveller Service provides assistance to landowners on how to manage unauthorised encampments on their land across Norfolk, Suffolk and the wider East Anglian region. It also manages Traveller sites on behalf of other local authorities

Relationship between the travelling and settled communities

- 4.20 Stakeholders described the relationship between the travelling and settled communities as 'variable'. There is sometimes a sense of mistrust between the communities. The settled community sometimes have negative views about the travelling communities and may question the ethnic identity of households who no longer travel. It is unhelpful that a minority of Gypsy and Traveller households leave unauthorised sites in poor condition. According to

a stakeholder from a neighbouring authority, there has been incidents of anti-social behaviour in the area adjacent to the Gypsy and Traveller site.

- 4.21 In terms of improving relations between the different communities, it was suggested that there needs to be better education and social awareness of the travelling communities. Great Yarmouth Borough Council employ two Gypsy and Traveller Liaison Officers whose role is to help bridge connections between communities. There is also a need for more positive messages about the travelling communities by local authorities and in the media.

Health and education needs

- 4.22 According to stakeholders, Gypsy and Traveller households have worse health and education outcomes compared to the settled community. However, members of the travelling communities may be less likely to report such issues to relevant agencies. In response, Norfolk County Council provide a [Traveller Education Service](#). The two Gypsy and Traveller Liaison Officers who manage the local authority site help families to access services and with health and educational needs. For example, in relation to Covid-19, they worked closely with households on the local authority site and the neighbouring unauthorised developments to access support and promote vaccine take-up and Covid-19 testing.

Communication

- 4.23 It was suggested that there needs to better cooperation between local authorities in relation to issues concerning Gypsies, Travellers, and Travelling Showpeople. Local authorities tend to react to traveller issues e.g. in relation to unauthorised encampments. There is insufficient cooperation to resolve issues around unauthorised encampments or to improve relations with the travelling community. Financial constraints mean that local authorities are not always able to take a proactive response to issues regarding the travelling communities. For example, suitable land is usually prioritised for residential development, as this yields a greater capital return compared to providing traveller sites.
- 4.24 There is need for improvement, particularly when assessing needs and understanding the requirements and travelling patterns of the travelling communities at county or subregional levels. There is a need to work in a joined-up way across the whole of Norfolk and agree sites for long- and short-term stays as well as a policy on tolerated sites. According to a stakeholder from a neighbouring authority, the Ipswich Strategic Planning Area (which covers the former Suffolk Coastal part of East Suffolk, Ipswich, Babergh and Mid Suffolk) has a Statement of Common Ground on cross-boundary planning matters which includes Gypsies and Travellers.

Summary

- 4.25 The stakeholder consultation offered important insights into the main issues faced by the travelling community within the county. It was generally acknowledged that there is a lack of

both permanent and transit accommodation provision. Also, some existing sites are in need of investment and upgrading to meet current standards. Social rented pitches, particularly those on larger sites, are not desirable to all households due to poor conditions and a preference to own pitches rather than pay rent. It was suggested that the main drivers of accommodation need are the need for younger people in existing households requiring future separate accommodation, and accommodation need arising from households residing in bricks and mortar accommodation wanting a pitch.

- 4.26 Key barriers to new accommodation provision noted by stakeholders included: a lack of suitable or affordable land; competing interests for suitable land; a lack of finance; and the complexity of planning processes. It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Also, land in more rural locations is more likely be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites although larger sites can be difficult to manage and lead to conflict between families.

5. Gypsies and Travellers

Introduction

- 5.1 This chapter provides a snapshot of households residing in the study area at the time of the consultation (completed February 2022) and an analysis of need for current and future pitches across the study area. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families (the accommodation needs of Travelling Showpeople are discussed in Chapter 6, and residential caravan dwellers in Chapter 7).
- 5.2 Table 5.1 below lists the number of authorised sites and pitches (including occupied, vacant, and potential), sites and pitches with temporary planning permission, unauthorised developments, and transit provision within the study area. Due to Covid-19 restrictions, whilst accommodation need arising from each site and pitch was determined, the consultation methods sometimes varied. For example, when direct consultation with households was not possible, information regarding pitch occupancy, travelling patterns, and accommodation needs was obtained using reliable sources such as relatives, neighbours, and site owners and managers. This resulted in consultation and data collection representing all known authorised pitches and sites.

Table 5.1 Great Yarmouth Gypsy and Traveller pitches					
Occupied Authorised Pitches	Vacant Authorised Pitches	Potential Authorised Pitches	Temporary Authorised Pitches	Unauthorised Development Pitches	Transit Pitches
15	0	3	0	0	6

Source: Study area local authorities

Table 5.2 Broads Authority Gypsy and Traveller pitches					
Occupied Authorised Pitches	Vacant Authorised Pitches	Potential Authorised Pitches	Temporary Authorised Pitches	Unauthorised Development Pitches	Transit Pitches
0	0	0	0	7	0

Source: Study area local authorities

- 5.3 The consultation included questions regarding issues such as family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and / or undeveloped pitches, and future plans for pitches), travelling patterns, and accommodation needs.
- 5.4 The number and location of pitches were determined using local authority data. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits, and consultation with households helped to clarify the status of

pitches (i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues).

5.5 Although attempts were made to access Gypsies and Traveller households residing in bricks and mortar accommodation, it was not possible to consult with them. However, an alternative method of determining the accommodation needs of households residing in bricks and mortar accommodation has been applied (see step 15 below). The methods used in attempting to contact households residing in bricks and mortar accommodation included:

- Asking households residing on sites if they were aware of any relatives or friends residing in bricks and mortar accommodation;
- Contacting key stakeholders to request help to access Gypsies and Travellers living in bricks and mortar; and
- Seeking information about the location of households residing in bricks and mortar accommodation through the stakeholder interviews

Accommodation need

5.6 Additional accommodation need derives from households residing on unauthorised development pitches (including those that are identified as tolerated but without full planning status), and households residing on authorised sites requiring more space. Accommodation need also derives from households residing in bricks and mortar accommodation. Households residing on sites, and stakeholders, commented on how it is important to acknowledge this component of accommodation need. Importantly, the GTRCAA determines household need rather than demand for additional accommodation.

5.7 Households with accommodation need stated their desire to stay with or close to family. No households residing on sites expressed an interest in residing in a house. Owners of unauthorised sites with space to accommodate their own additional need are considering applying for planning permission to authorise their pitches.

5.8 Whilst the local authority site has a waiting list, this assessment does not include them in the accommodation needs calculations as they are unreliable indicators of need. For example, households registered on several waiting lists for pitches could lead to double-counting.

5.9 The 7 unauthorised pitches are located in the Broads Authority Executive Area (2 are at Blackgate Farm and are an accurate number, and 5 were identified on site at Cobholm Island, but this is an estimation). At the time of this assessment and at the time of finalising this report, the Broads Authority were reviewing the occupancy and status of the site. This work is proving to be quite complex and may take some time. When this investigation work

has been completed, an addendum to this study will be produced, which will confirm the number and occupancy of pitches.

Requirement for residential pitches Years 1-5:

- 5.10 The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Tables 5.2 and 5.3 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.
- 5.11 This GTRCAA provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2015 ('PPTS' column). The 'Ethnic' column contains the accommodation needs of all households identified as Gypsies and Travellers, whilst the PPTS column only includes the accommodation needs of households who meet the PPTS 2015 definition i.e. have not permanently ceased to travel. The first table relates to the needs for the Broads Authority and the second for Great Yarmouth.

Broads Authority

5.3: Estimate of the need for permanent residential site pitches: 2022-2027		
	Ethnic	PPTS
1) Current occupied permanent residential site pitches	0	0
<i>Current residential supply</i>		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality in next 5 years	0	0
4) Net number of households on sites expected to leave the area in next 5 years	0	0
5) Number of households on sites expected to move into housing in next 5 years	0	0
6) Residential pitches planned to be built or to be brought back into use in next 5 years	0	0
Total Additional Supply	0	0
<i>Additional residential need</i>		
7) Seeking permanent permission from temporary sites	0	0
8) Households (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0
9) Households on transit pitches requiring residential pitches in the area	0	0
10) Households on unauthorised encampments requiring residential pitches	0	0
11) Households on unauthorised developments requiring residential pitches	7	6
12) Households currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging household in step 8	0	0
13) Net new households expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing households	0	0
15) Households in housing but with a psychological aversion to housed accommodation	0	0
Total Need	7	6
<i>Balance of Need and Supply</i>		
Total Additional Pitch Requirement	7	6
Annualised Additional Pitch Requirement	1.4	1.2

Great Yarmouth

5.4: Estimate of the need for permanent residential site pitches: 2022-2027		
	Ethnic	PPTS
1) Current occupied permanent residential site pitches	15	15
<i>Current residential supply</i>		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality in next 5 years	0	0
4) Net number of households on sites expected to leave the area in next 5 years	2	2
5) Number of households on sites expected to move into housing in next 5 years	2	2
6) Residential pitches planned to be built or to be brought back into use in next 5 years	3	3
Total Additional Supply	7	7
<i>Additional residential need</i>		
7) Seeking permanent permission from temporary sites	0	0
8) Households (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0
9) Households on transit pitches requiring residential pitches in the area	4	4
10) Households on unauthorised encampments requiring residential pitches	0	0
11) Households on unauthorised developments requiring residential pitches	0	0
12) Households currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging household in step 8	0	0
13) Net new households expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing households	3	3
15) Households in housing but with a psychological aversion to housed accommodation	2	1
Total Need	9	8
<i>Balance of Need and Supply</i>		
Total Additional Pitch Requirement	2	1
Annualised Additional Pitch Requirement	0.4	0.2

Source: GTRCAA 2022

Requirement for residential pitches Years 1-5: steps of the calculation

5.12 Information from local authorities and the census plus evidence from the survey was used to inform the calculations including:

- The number of Gypsies and Travellers housed in bricks and mortar accommodation
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches

5.13 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations.

Supply of pitches

- 5.14 Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation need used.

Step 1: Current permanent site pitches occupied by Gypsies and Travellers

- 5.15 Based on information provided by the councils and corroborated by site visits and household surveys. There are no authorised pitches within boundaries of the Broads Authority and 15 in Great Yarmouth, on one site.

Step 2: Number of unused residential pitches available

- 5.16 There are currently 0 vacant pitches.

Step 3: Number of existing pitches expected to become vacant

- 5.17 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.¹⁸

Step 4: Number of family units in site accommodation expressing a desire to leave the study area

- 5.18 There are 2 family units in Great Yarmouth with a desire to leave the study area resulting in the supply of 2 pitches.

Step 5: Number of family units in site accommodation expressing a desire to live in housing

- 5.19 This is determined by survey data. It was assumed that all those currently residing on sites planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. This results in a supply of 2 pitches in relation to Great Yarmouth and 0 for Broads Authority.

Step 6: Residential pitches with planning permission at time of assessment are planned to be built or brought back into use

- 5.20 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted

¹⁸ E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987. NB: For Travelling Showpeople, the standard mortality rate is used.

planning permission but have not yet been developed. Potential pitches include those which have been partly developed, or which were previously occupied but are currently not occupied and in need of redevelopment. There are 3 pitches in the Great Yarmouth area (0 in the Broads Authority area) that are expected to be built or brought back into use by Gypsies and Travellers in the study area during years 1-5. 3 of those pitches listed in step 6 are currently occupied by non-Gypsies and Travellers who are expected to leave the site within the first five years – their pitches will be made available to Gypsies and Travellers. If the non-Gypsies and Travellers do not leave the area and continue to reside on the site, 3 pitches will need to be removed from the additional supply. This will subsequently increase the accommodation need by 3 pitches.

Need for pitches

- 5.21 This needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column); and second, based on PPTS 2015 ('PPTS' column).

Step 7: Seeking permanent permission from temporary sites

- 5.22 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within this period will still require accommodation within the study area. The pitches are removed from supply rather than added to accommodation need in order to emphasise that they form part of the supply until temporary planning permission expires. However, as there are currently no pitches with temporary planning permission located in the study area this does not impact on accommodation need.

Step 8: Family units on pitches seeking residential pitches in the study area

- 5.23 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.
- 5.24 This category of accommodation need overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need of 0 pitches in the study area.

Step 9: Family units on transit pitches seeking residential pitches in the study area

- 5.25 This is determined by survey data. These family units reported that they required permanent pitches within the study area in the next five years. There was 4 ('ethnic') and 4 ('PPTS') need resulting from this source (from within the Great Yarmouth area).

Step 10: Family units on unauthorised encampments seeking residential pitches in the study area

- 5.26 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 0 identified households surveyed on unauthorised encampments within the study area during the survey period.

Step 11: Family units on unauthorised developments seeking residential pitches in the study area

- 5.27 From consultation and data from the study area planning authorities, there are 7 Gypsy and Traveller unauthorised developments (including those pitches regarded by the local planning authority as tolerated). They are all located within the Broads Authority area. This includes 2 that the Broads Authority recognise at Blackgate Farm (based on the appeal APP/E9505/C/20/3245609) and 5 identified during visit to the Cobholm Island. This will result in the need of 7 residential pitches over the 5-year period ('ethnic definition'), and 6 pitches ('PPTS' definition), all within the Broads Authority area (there are no known unauthorised developments in Great Yarmouth). These were identified following gathering and analysis of planning authority data and visiting the sites (including those refused planning permission) to confirm existence, occupancy and need. There are also non-Gypsies and Travellers residing in the same area, but this is a matter for residential need and not Gypsy and Traveller need. The Broads Authority are seeking to clarify the number of pitches on Cobholm Island and who they are occupied by. When this work is completed, an addendum to this study will be produced in relation to the findings.

Step 12: Family units on overcrowded pitches seeking residential pitches in the area

- 5.28 Pitches are overcrowded if there is insufficient space to accommodate household members and/or the pitch is unable to accommodate the number of caravans required to accommodate all household members. Pitches can also be overcrowded due to 'hidden' and / or additional households residing on the pitch without alternative accommodation. Overcrowding results in a need for 0 new households requiring residential pitches over the first five-year period ('ethnic definition'), and 0 pitches ('PPTS' definition).

Step 13: New family units expected to arrive from elsewhere

- 5.29 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as

in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow.

Step 14: New family formations expected to arise from within existing family units on sites

- 5.30 This relates to the number of household members aged 15 years or over who require a separate pitch over the first 5-year period including those who will form a new household. This only relates to Great Yarmouth, and results in a need for 3 additional pitches based on the 'ethnic definition', and 3 pitches based on the 'PPTS' definition (all in the Great Yarmouth area).

Step 15: Family units in housing with a psychological aversion to housed accommodation

- 5.31 Whilst not a medical condition, 'psychological aversion' is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate a cultural aversion to residing in bricks and mortar accommodation (see DCLG October 2007)¹⁹. The factors concerned can include feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.
- 5.32 This was determined firstly by estimating the number of houses occupied by Gypsies and Travellers. Work undertaken by Shelter (2005) estimates that between one-half to two-thirds of the Gypsy and Traveller population reside in bricks and mortar accommodation. From previous GTAA's undertaken by *RRR Consultancy Ltd*, it is estimated that around 10% of Gypsies and Travellers residing in bricks and mortar accommodation experience psychological aversion and require accommodating on sites. This was based on previous GTAA's undertaken by *RRR Consultancy* including Central Lincolnshire (2013 and 2020), South Kesteven and Rutland (2016), and Bassetlaw (2019). Local Plan examinations already undertaken have found these GTAA's to be sound. This will result in the formation of 2 new households requiring residential pitches over this five-year period ('ethnic definition'), and 1 pitch ('PPTS' definition) (all within the Great Yarmouth area as there is no available data in relation to the Broads Authority).

Balance of Need and Supply

- 5.33 From the above the Total Additional Pitch Requirement is calculated by deducting the supply from the need.

¹⁹ DCLG, Consultation on revised planning guidance in relation to Travelling Showpeople, January 2007.

Broads Authority

Table 5.5: Summary of Gypsy and Traveller pitch needs Years 1-5

	Ethnic	PPTS
Supply	0	0
Need	7	6
Difference	7	6

Source: GTRCAA 2022

Great Yarmouth

Table 5.6: Summary of Gypsy and Traveller pitch needs Years 1-5

	Ethnic	PPTS
Supply	7	7
Need	9	8
Difference	2	1

Source: GTRCAA 2022

Requirement for residential pitches 2027-41:

5.34 Considering future accommodation need it assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 14 above), mortality, and movement into and out of the study area accommodation need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown below. Please note that the base figures include both authorised occupied and vacant pitches, whilst the year 6 base figures assume that any potential pitches have been developed.

5.35 Year 6 pitch base figures are determined by a number of factors including:

- the number of occupied pitches in 2022 (as determined by the household survey)
- the number of vacant pitches in 2022 (as determined by the household survey)
- the number of potential pitches (as determined by local authority data)
- accommodation need for the first five-year period (as determined by the GTRCAA)

5.36 It is assumed that by Year 6 vacant pitches will be occupied, potential pitches will have been developed and occupied, and that any additional need identified for the period 2022-2027 has been fulfilled.

- 5.37 This is based on an analysis of various factors derived from the household surveys including current population numbers, the average number of children per household, and household formation rates. In relation to this assessment, analysis of the current population indicates that a 50% household formation rate will lead to additional need in the following 5-year (or part thereof) periods and a mortality rate of 2.285%. It is assumed that these rates are likely to continue during the following 14-year period and result in the following needs.

Broads Authority

Table 5.7: Summary of accommodation needs 2027-41 (pitches)

Period	Ethnic definition	PPTS 2015 definition
2027-2032	1	1
2032-2037	1	1
2037-2041	1	1
2027-2041	3	3

Source GTRCAA 2022

Great Yarmouth

Table 5.8 Summary of accommodation needs 2027-41 (pitches)

Period	Ethnic definition	PPTS 2015 definition
2027-2032	2	2
2032-2037	2	2
2037-2041	2	2
2027-2041	6	6

Source: GTRCAA 2022

Requirements for transit pitches / negotiated stopping arrangements

- 5.38 In relation to transit provision, it is recommended that both local authorities within the study area collectively adopt a negotiated stopping policy. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that all of local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or countywide basis.
- 5.39 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).
- 5.40 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on

to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

Summary

- 5.41 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. Accommodation needs resulting from the calculations in the tables above for the study area and the three constituent local authorities.
- 5.42 Whilst the local planning authority needs to address the accommodation need identified below, it is also recommended that the local plan incorporates a criteria-based policy which takes into consideration any planning applications that might materialise over the plan period from households not considered by this assessment. This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified below and could be met through windfall applications.

Broads Authority

Table 5.9: Summary of accommodation needs 2022-41 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
2022-2027	7	6
2027-2032	1	1
2032-2037	1	1
2037-2041	1	1
2022-2041	10	9

Source: GTRCAA 2022

Great Yarmouth

Table 5.10: Summary of accommodation needs 2022-41 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
2022-2027	2	1
2027-2032	2	2
2032-2037	2	2
2037-2041	2	2
2022-2041	8	7

Source: GTRCAA 2022

6. Residential caravans

Introduction

- 6.1 As described in Chapter 1, this chapter considers the accommodation needs of permanent residential caravan dwellers who do not consider themselves to be Gypsies, Travellers or Travelling Showpeople. Unlike Gypsies and Travellers, residential caravan dwellers are not considered to be an ethnic minority and, as such, are not protected by the [Equality Act 2010](#). However, recent Government guidance (March 2016) and paragraph 124 of the Housing and Planning Act 2016 indicates that local authorities should consider the accommodation needs of residential caravan dwelling households.

Consultation

- 6.2 From consultation with stakeholders combined with local authority data it is estimated that there are 453 permanent authorised (i.e. pitches with planning permission and licensed for permanent residential caravan use) within the study area.
- 6.3 There are also an unknown number of unauthorised developments, based on official data. However, based on information gleaned from consultation and visiting the potential site locations, an estimated 12 households are residing on unauthorised developments within the Broads Authority area of Great Yarmouth located at Blackgate Farm and Cobholm Island. There are also an estimated 23 households permanently residing in caravans on private land and on pitches registered for holiday and touring provision within the Great Yarmouth area.
- 6.4 Similar to those residing on boats, many households residing on residential pitches consist of single people or couples, with a small proportion occupied by households with children. Some of the residential sites apply occupation criteria such as residents having to be aged 50 years or over. Also, some sites do not allow children or pets (unless small household pets) on site. Households may move into caravans on a temporary basis until they can afford buy or rent accommodation in the local area. This enables households to register on housing waiting lists which have minimum length of residency criteria. Residing in residential caravans is regarded by some households as an affordable option.

Calculation of accommodation need

- 6.5 Given that the requirement to determine the accommodation needs of residential non-Gypsy or Traveller caravan dwellers was only recently introduced by the DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016), there is no established method to determine need. The need for permanent residential pitches in the study area is based on the model suggested in [DCLG \(2007\)](#)²⁰ guidance and supplemented by data provided by the

²⁰ Although the guidance was withdrawn in December 2016 it remains useful as a model for determining accommodation need.

local authorities and supplemented by data provided by the local authorities and consultation with stakeholders. Whilst this guidance relates specifically to assessing needs for Gypsy and Traveller accommodation, it is considered appropriate for assessing needs for residential caravan dwellers (please note that residential caravan sites with more permanent structures are often referred to as 'mobile home parks').

- 6.6 The PPTS definition does not apply to accommodation need for residential caravan dwellers, as non-Gypsy and Traveller caravan dwellers primarily do not travel in their caravans, and a substantial proportion of the caravans they occupy are static caravans unable to move. Also, it should be acknowledged that the accommodation needs of caravan dwellers may reflect a 'lifestyle' choice or a lack of alternative bricks and mortar accommodation.

Requirement for Residential Pitches 2022-2027

- 6.7 Due to Covid-19 restrictions, face-to face consultation was not possible with residential caravan dwellers or owners. As such, the levels of supply and need were based on an estimation of the following:

- Number of mobile park homes / sites in the local authority area
- Total number of mobile home/park home units in the LA area
- A breakdown between privately rented and owner occupied
- Number of current and potential vacant pitches
- Level of demand (aided by data and consultation)
- Affordability of such accommodation
- Whether these are the main residence of the occupiers or secondary/holiday accommodation

- 6.8 The following illustrates how the consultation and the other methods discussed above, have resulted in an estimated requirement for a further 55 residential caravan pitches for the period 2022 to 2027 (12 in Broads Authority area and 43 in Great Yarmouth). It is based on all known residential occupancy and does not include those pitches occupied as second or holiday home. Table 6.1 shows the number of residential sites (including private family sites and registered park homes) based on local authority data:

Table 6.1: Estimated Authorised Number of residential sites	
Broads Authority	0
Great Yarmouth	14
Total (Study Area)	14

Source: Local authority data 2022

- 6.9 It has not been possible to determine the proportions of private rented or owner-occupied pitches, or to determine levels of affordability. It is important to note that whilst residing in a caravan is primarily a lifestyle choice for most people who opt for this form of accommodation, there are some residing in caravans due to financial issues and being unable to afford an

alternative. However, the following provides the known overall number of residential pitches (including private family sites and registered park homes) per authority for the study area as a whole (based on local authority data):

Table 6.2: Estimated Authorised Number of residential pitches

Broads Authority	0
Great Yarmouth	453
Total (Study Area)	453

Source: Local authority data 2022

- 6.10 The following shows the level of residential caravan pitch supply in each of the two local planning authorities. Numbers of supply are based on registered residential pitches on sites registered as residential caravan sites are as follows:

Broads Authority

6.3: Estimate of the need for permanent residential site pitches: 2022-2027	
1) Current occupied permanent residential site pitches	0
<i>Current residential supply</i>	
2) Number of unused residential pitches available	0
3) Number of existing pitches expected to become vacant through mortality (2%)	0
4) Net number of households on sites expected to leave the area	0
5) Number of households on sites expected to move into housing	0
6) Residential pitches planned to be built or to be brought back into use	0
Total Additional Supply	0
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary sites	0
8) Households on unauthorised encampments requiring residential pitches	0
9) Households on unauthorised developments requiring residential pitches	12
10) Estimated demand	0
11) Net new households expected to arrive from elsewhere	0
12) New family formations expected to arise from within existing households	0
Total Need	12
<i>Balance of Need and Supply</i>	
Total Additional Pitch Requirement	12
Annualised Additional Pitch Requirement	2

Source: GTRCAA 2022

Great Yarmouth

6.4: Estimate of the need for permanent residential site pitches: 2022-2027	
1) Current occupied permanent residential site pitches	453
<i>Current residential supply</i>	
2) Number of unused residential pitches available	0
3) Number of existing pitches expected to become vacant through mortality (2%)	10
4) Net number of households on sites expected to leave the area	0
5) Number of households on sites expected to move into housing	0
6) Residential pitches planned to be built or to be brought back into use	0
Total Additional Supply	10
<i>Additional residential need</i>	
7) Seeking permanent permission from temporary sites	0
8) Households on unauthorised encampments requiring residential pitches	0
9) Households on unauthorised developments requiring residential pitches	23
10) Estimated demand	30
11) Net new households expected to arrive from elsewhere	0
12) New family formations expected to arise from within existing households	0
Total Need	53
<i>Balance of Need and Supply</i>	
Total Additional Pitch Requirement	43
Annualised Additional Pitch Requirement	8

Source: GTRCAA 2022

- 6.11 In addition to the above, there are also those pitches and sites registered as Gypsy and Traveller sites, but no longer occupied or available to Gypsy and Travellers (based on evidence gathered during site visits and consultation with households and stakeholders). The supply in the study area based on evidence is as 0 for both the Broads Authority and for Great Yarmouth. As stated in Chapter 5, 3 pitches allocated for use by Gypsy and Traveller households are currently occupied by non-Gypsies and Travellers. However, they intend to move outside the study area in the next 5 years. If they remain in the study area, but are not able to remain on the Gypsy and Traveller site, their accommodation needs would have to be considered in the calculations below.

Supply of pitches

- 6.12 Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation need used.

Step 1: Current permanent site pitches occupied

- 6.13 Based on information provided by the local planning authorities, there are no authorised residential caravan pitches located within boundaries of the Broads Authority, and 453 pitches in Great Yarmouth.

Step 2: Number of unused residential pitches available

6.14 There are currently 0 vacant pitches.

Step 3: Number of existing pitches expected to become vacant

6.15 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. This results in a need of 10 pitches.

Step 4: Number of family units in site accommodation expressing a desire to leave the study area

6.16 There is no evidence of households with a desire to leave the area.

Step 5: Number of family units in site accommodation expressing a desire to live in housing

6.17 There is no evidence of households with a desire to move into housing.

Step 6: Residential pitches with planning permission at time of assessment are planned to be built or brought back into use

6.18 This is determined by local authority data. There is no evidence of pitches with planning permission planned to be built or brought back into use.

Need for pitches**Step 7: Seeking permanent permission from temporary sites**

6.19 This is determined by local authority data. It is assumed that households residing on pitches whose planning permission expires within the first 5-year period will still require accommodation within the study area. However, as there are currently no pitches with temporary planning permission located within the study area this does not impact on accommodation need.

Step 8: Family units on unauthorised encampments seeking residential pitches in the study area

6.20 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. There were 0 identified households on unauthorised encampments within the study area during the survey period.

Step 9: Family units on unauthorised developments seeking residential pitches in the study area

6.21 From consultation and data from the study area, there are 35 unauthorised developments (including those pitches regarded by the local authority as 'tolerated'). 12 are located within the Broads Authority area and 23 within Great Yarmouth (based on 5% of the occupied pitches). This will result in the need for 35 additional residential pitches over the first 5-year period. The 12 pitches within the Broads Authority area are based upon estimations of unauthorised developments, based on site visits, consultation with residents on Cobholm Island, and council data (including Blackgate Farm appeal information). The Broads Authority are undertaking investigation work into the number of pitches on Cobholm Island and who they are occupied by. When this work is completed, an addendum to this study will be produced in relation to their findings.

Step 10: Estimated demand

6.22 With the absence of other data, this has been based on evidence provided by the 2017 Norfolk Accommodation Needs Assessment which showed a need of residential pitches in the Great Yarmouth area equating to 11 %. However, as 14 of the 29 were at the Gapton Lane site and their need is no longer relevant 6% of occupied pitches has been applied for demand.

Step 11: New family units expected to arrive from elsewhere

6.23 Whilst acknowledging that households from outside the study area requiring residential caravan pitches may in-migrate, there is no evidence regarding the extent of such need. As such, it is recorded as 0. However, step 10 above may include accommodation need deriving from in-migrating households. It is recommended that the local planning authorities consider applications from households from outside of the study area, or by existing residential pitch providers aiming to meet demand from in-migration, on a case-by-case basis (as discussed below).

Step 12: New family formations expected to arise from within existing family units on sites

6.24 This relates to the number of household members aged 15 years or over who require a separate pitch over the first 5-year period including those who will form a new household. There is no evidence for this need and is therefore recorded as 0.

6.25 The level of estimated need in the study area is based on the following:

Broads Authority

Table 6.5: Summary of residential pitch needs Years 1-5

Supply	0
Need	12
Difference	12

Source: GTRCAA 2022

Great Yarmouth

Table 6.6: Summary of residential pitch needs Years 1-5

Supply	10
Need	53
Difference	43

Source: GTRCAA 2022

Requirement for residential pitches 2027-2041

- 6.26 It is assumed that by 2027 vacant residential pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply. The base figures regarding the number of non-Gypsy and Traveller residential pitches at the end of the first 5-year period would be 12 in Broads Authority and 63 in Great Yarmouth.
- 6.27 Please note that the 2022 base figures include both authorised occupied and vacant residential pitches, whilst the 2027 base figures assume that any potential pitches have been developed.
- 6.28 Year 6 pitch base figures are determined by a number of factors including:
- the number of occupied pitches in 2022 (as determined by the household survey)
 - the number of vacant pitches in 2022 (as determined by the household survey)
 - the number of potential pitches (as determined by local authority data)
 - accommodation need for the first five-year period (as determined by the GTRCAA)
- 6.29 It is assumed that by Year 6 vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply.
- 6.30 Residential caravan pitch accommodation need for the period 2027-2041 is determined by a population growth rate of 3% per 5-year period, and a mortality rate of 2% per 5-year period, equating to a net population increase of 3% per 5-year period.

Broads Authority

Table 6.7: Summary of residential pitch accommodation needs 2027-41 (pitches)	
Period	
2027-2032	0
2032-2037	0
2037-2041	0
2027-2041	0

Source GTRCAA 2022

Great Yarmouth

Table 6.8: Summary of residential pitch accommodation needs 2027-41 (pitches)	
Period	
2027-2032	5
2032-2037	5
2037-2041	5
2027-2041	15

Source: GTRCAA 2022

Summary

6.31 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on residential caravan pitches. Accommodation need resulting from the consultation and the calculations above are as follows:

Table 6.9: Summary of accommodation needs 2022-41 (residential caravan pitches)					
	2022-27	2027-32	2032-37	2037-41	2022-41
Broads Authority	12	0	0	0	12
Great Yarmouth	43	5	5	5	58
Total	55	5	5	5	70

Source: GTRCAA 2022

7. Conclusion and recommendations

Introduction

- 7.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new provision, facilities, and recording and monitoring processes.
- 7.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the needs of Gypsy and Traveller sites, Travelling Showpeople, and residential caravan dwellers. It then concludes with key recommendations.
- 7.3 The accommodation needs calculations undertaken as part of this GTRCAA were based on analysis of both secondary data and primary consultation with Gypsies, Travellers, Travelling Showpeople, key stakeholders, and boat yard managers and residential caravan park owners. The consultation was undertaken in a Covid-19 safe manner i.e. it followed government guidance and restrictions. Due to Covid-19, a combination of direct consultation with households and proxy consultation with members of the community (including site/ yard owners / managers, neighbours and relatives) was undertaken, some of which was undertaken over the phone.

Policy Changes

- 7.4 In August 2015 the DCLG published 'Planning Policy for Traveller Sites' (including Travelling Showpeople yards). It states that for the purposes of 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.

- 7.5 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.

- 7.6 In March 2016 the then Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances including, for example caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- 7.7 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, deletes sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Accommodation need

- 7.8 The following outlines the accommodation need for each of the community groups for the Local Plan period of 19 years (base date 2022).

Gypsies and Travellers

Broads Authority

Table 7.1: Summary of accommodation needs 2022-41 (pitches)		
Period	Ethnic definition	PPTS 2015 definition
2022-2027	7	6
2027-2032	1	1
2032-2037	1	1
2037-2041	1	1
2022-2041	10	9

Source GTRCAA 2022

Great Yarmouth

Table 7.2 Summary of accommodation needs 2022-41 (pitches)

Period	Ethnic definition	PPTS 2015 definition
2022-2027	2	1
2027-2032	2	2
2032-2037	2	2
2037-2041	2	2
2022-2041	8	7

Source: GTRCAA 2022

Residential Caravans

Table 7.3: Summary of accommodation needs 2022-41 (residential caravan pitches)

	2022-27	2027-32	2032-37	2037-41	2022-41
Broads Authority	12	0	0	0	12
Great Yarmouth	43	5	5	5	58
Total	55	5	5	5	70

Source: GTANA 2022

The location of new provision

- 7.9 This is general consensus that smaller sites and yards are preferred by Gypsy, Traveller, and Showpeople communities due to better management and maintenance of provision and security. Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities alongside discussions with different community groups, to ensure that any additional need that may arise is identified.
- 7.10 In terms of identifying broad locations for new permanent sites, there are a number of factors which could be considered including:

Costs

- How do land costs impact on feasibility i.e. is it affordable?
- Implementation of services – is it possible for the new site to connect to nearby mains services e.g. electricity, gas, water or sewerage?
- Can good drainage be ensured on the new provision?

Social

- Does the proposed location of the new provision lie within a reasonable distance of school catchment areas?
- Sustainability – is the proposed location close to existing bus routes?
- Proximity of social and leisure services – is the proposed location close to leisure facilities such as sports centres, cinemas etc. or welfare services such as health and social services etc?

Availability

- Who owns the land and are they willing to sell / rent?
- Is access easy or will easements across other land be needed both for residents and services/utilities?
- Are utilities close enough to service the provision at realistic prices?

Deliverability

- Does the proposed location meet existing general planning policy in terms of residential use, (for example in relation to Green Belt, flooding and the historic environment)?
- Can the owner sell the land easily and quickly?
- Can utilities connect to the proposed provision?
- Can highways connect to the proposed provision?

7.11 Considering the evidence gathered throughout the GTRCAA, it is likely that the key factors determining new provision are:

- The affordability of land suitable for the development of new sites and the cost of development
- The need to ensure that new provisions are within reasonable travelling distance of social, welfare and cultural services
- The need to carefully consider the proximity of new provisions to existing provisions i.e. whether social tensions might arise if new provisions are located too close to existing provisions
- The sustainability of new provisions i.e. ensuring that they do not detrimentally impact on the local environment and do not place undue pressure on the local infrastructure

7.12 It is important that new provisions are located close to amenities such as shops, schools and health facilities or where there are good transport links or within reasonable distance for households to access the necessary facilities and amenities. DCLG (2015) guidance suggests that local planning authorities should strictly limit new Gypsy and Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure.

7.13 As stated in Chapter 2, the Great Yarmouth Local Plan Part 2 (adopted December 2021) amends policy CS5 of the Core Strategy (2013-2030) which outlines the Council's policy regarding Gypsies, Travellers, and Traveling Showpeople. It states that the Gapton Hall site will be safeguarded for use by Gypsies and Travellers, and that the local authority will explore opportunities for the reconfiguration and/or extension of the site to meet identified needs. Policy CS5 contains locational criteria to help determine suitable locations for the development of new sites or yards. Similarly, the Broads Authority Local Plan 2015-2036

(adopted May 2019) contains criteria for determining where appropriate development will be met. Notwithstanding the updated accommodation needs figures, evidence provided throughout this GTRCAA indicates no need to substantially amend local planning policies regarding the accommodation needs of Gypsies, Travellers, and Travelling Showpeople.

- 7.14 The DCLG (2015) guidance states that when considering applications, local planning authorities should attach weight to the following matters:
- a. effective use of previously developed (brownfield), untidy or derelict land
 - b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
 - c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
 - d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

The size of new provision

Gypsy and Traveller pitches

- 7.15 [DCLG \(2008\)](#)²¹ guidance states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.
- 7.16 Based on DCLG guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500 square metres (0.05ha) would comfortably accommodate the following on-pitch facilities:
- Hard standing for a touring caravan (enabling households to travel)
 - Hard standing for a static caravan (including double static trailers)
 - 2 car parking spaces
 - 1 amenity block
 - Hard standing for storage shed and drying

²¹ Please note that this publication was withdrawn in September 2015.

- Garden/amenity area

7.17 If granting permission on an open plan basis, permission should be given on a pitch-by-pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, 2 touring caravans and 1 – 2 static caravans along with 4 parking spaces, 2 blocks etc., could be counted as 2 pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

Transit provision

7.18 Although there is currently a transit site consisting of 6 pitches in the study area, it has mainly been used by Gypsy and Traveller households waiting for permanent pitches on the local authority site to become available. The need for further transit provision could be met by the implementation of a negotiated stopping policy.

7.19 The term ‘negotiated stopping’ is used to describe agreed short-term provision for transient Gypsies and Travellers. It was first developed by Leeds Gypsy and Traveller Exchange (GATE) and involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to more suitable land (please see Appendix 1 for an example negotiated stopping place protocol).

7.20 Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).

7.21 The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but may include Travellers agreeing to leave sites clean and not make too much noise with the local authority providing waste disposal and toilets, sometimes showers and water too. However, as Leeds GATE state, negotiated stopping is a locally agreed solution so may differ in different locations. For Negotiated Stopping to work it has to involve local authorities negotiating with roadside Travellers. It will involve talking to and consulting roadside Travellers and working out solutions²².

7.22 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on

²² See <https://www.negotiatedstopping.co.uk/what-is-negotiated-stopping>

to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

Residential caravans

7.23 As described in Chapter 1, this GTRCAA considers the accommodation needs of permanent residential caravan dwellers who do not consider themselves to be Gypsies, Travellers or Travelling Showpeople. Unlike Gypsies and Travellers, residential caravan dwellers are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. However, Government guidance (March 2016) and paragraph 124 of the Housing and Planning Act 2016 indicates that local authorities should consider the accommodation needs of residential caravan dwelling households. This study has considered their needs and provides an estimation of need.

7.24 Residential caravan pitches tend to require smaller spaces than Gypsy and Traveller pitches. For example, residential caravan dwellers tend not to require both static and touring caravans. They are primarily just static caravans, as they are unlikely to travel, and therefore less likely to require space for a caravan to travel in, just one to live on their pitch. Overall, provision would need to consider space for the following:

- Hard standing for a static caravan (including double static trailers)
- Minimum of 1 car parking space
- Hard standing for storage shed and drying
- Garden/amenity area

Summary

7.25 The figures for Gypsy and Traveller, and residential caravans pitches within the Broads Authority areas are based upon estimations of unauthorised developments. The Broads Authority are undertaking investigation work into the number of pitches on Cobholm Island and who they are occupied by. When this work is completed, an addendum to this study will be produced and confirm the number and occupancy of pitches.

7.26 There is an overall accommodation need in the study area over a 19-year period for 18 additional pitches (ethnic definition), and 16 pitches (PPTS 2015 definition). It is recommended that the authorities have a corporate policy in place to address negotiated stopping places for small-scale transient Gypsy and Traveller encampments, and that if they develop a transit site that they work with neighbouring authorities to determine the location and size of new transit provision.

- 7.27 It is recommended that the local planning authorities seek to meet the PPTS need (as required) with 'ethnic' need covered by a criteria-based policy. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also able to demonstrate that how accommodation need for those who do not meet the PPTS definition are being addressed. The local authorities could adopt the accommodation needs as determined by the PPTS 2015 definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a reserve need. This means that the local planning authorities would firstly meet the need of 16 (7 within the first 5 years) as the obligation but accept the need of a further 2 (2 within the first 5 years) as potential need if further applications are brought forward through windfalls.
- 7.28 In relation to residential caravan need, there is a need for 70 additional pitches across the study area. Any accommodation need not delivered during the first 5-year period will be carried forward to subsequent 5-year periods.
- 7.29 It is also recommended that the local planning authorities incorporate into Local Plans a criteria-based policy (such as the Local Plan policies discussed above) which consider planning applications that might materialise over the plan period from households not considered by this assessment (in relation to all of the community groups). This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified below and could be met through windfall applications.
- 7.30 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:
- In relation to Gypsies and Travellers it is recommended that the local authorities work closely with the families to determine how their accommodation need can best be met.
 - Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
- 7.31 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

Planning policy:

- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.

- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites or yards.
- To consider alternative options for developing new sites and yards such as developing them on a cooperative basis, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller, and Showpeople communities.
- Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups), to review its current, historic and potential planning status, and review the most effective way forward.
- To consider safeguarding Gypsy, and Traveller people sites with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

Management:

- Housing organisations need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- Develop a holistic vision for their work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies in relation to Gypsy and Traveller, Travelling Showpeople and boat dweller communities.
- During the ongoing implications of Covid-19 impacting the communities, determine help and support the local authorities and other services could provide to the households.

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Glossary

Amenity block

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

Authorised site

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

Average

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

Bedroom standard

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers residing on sites to take into account that caravans or mobile homes may contain both bedroom and residing spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

Bricks and mortar accommodation

Permanent housing of the settled community, as distinguished from sites.

Caravan

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960 a caravan as:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

Concealed household

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

Doubling up

More than one family unit sharing a single pitch.

Emergency stopping places

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

Family Owner Occupied Gypsy Site

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

Family unit

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

Gypsy

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

Gypsy and Traveller

As defined by DCLG Planning Policy for Traveller Sites (August 2015):

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.

The DCLG guidance also states that in determining whether persons are "gypsies and travellers" for the purposes of 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 resuming a nomadic habit of life in the future, and if so, how soon and in what circumstances.

Household

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

Irish Traveller

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

Local Authority Sites

The majority of pitches on local authority owned or managed sites are designed for permanent residential use. The latest published Traveller Caravan Count undertaken in January 2020 suggests that there are a total of 4,503 permanent local authority and private registered provider pitches capable of housing 7,446 caravans.

Local Development Documents (LDD)

Local Plans and other documents that contain planning policies and are subject to external examination by an Inspector. It is important to note that Supplementary Planning Documents (SPDs) contain guidance are not subject to Examination. Planning applications are determined in relation to an adopted Development Plan which contains documents found to be sound at an External Examination.

Negotiated Stopping

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 arrangements 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. The arrangement is between the local authority and the (temporary) residents.

Net need

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

New Traveller (formerly 'New Age Traveller')

Members of the settled community who have chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

Newly forming families

Families residing as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

Overcrowding

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

Permanent residential site

A site intended for long-stay use by residents. They have no maximum length of stay but often constraints on travelling away from the site.

Pitch

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

Plot

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

Primary data

Information that is collected from a bespoke data collection exercise (e.g. surveys, focus groups or interviews) and analysed to produce a new set of findings.

Private rented pitches

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

Psychological aversion

Whilst not a medical condition this is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.

Secondary data

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

Settled community

Used to refer to non-Gypsies and Travellers who live in housing.

Site

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident, or rented from a private or social landlord. Sites vary in type and size

and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

Socially rented site

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offers at below private market levels.

Tolerated and Untolerated sites

According to the DLUHC July 2021 Traveller Count Technical Notes, a 'tolerated' site is one where the local authority has decided not to seek the removal of the encampment, and where the encampment has been, or is likely to be, allowed to remain for an indefinite period of time.

Examples of a site which would be classified as 'not tolerated' are:

- A planning enforcement notice has been served (including Temporary Stop Notices)
- The results of a planning enquiry are pending
- An injunction has been sought
- The compliance period has been extended.

Transit site/pitch

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

Travelling Showpeople

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

Unauthorised development

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

Unauthorised encampment

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

Unauthorised site

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.

Appendix 1: Negotiated stopping place protocol example

This agreement is between [Local Authority] and [named head of family]

This agreement relates to the time limited toleration of your encampment on [Local Authority] owned land adjacent to xxxx. The land is shown on the appending map.

The Council is currently willing to tolerate your encampment on the site for a short period of time until xxxx. The Council recognises its legal obligations to carry out needs assessment prior to initiating legal action to recover possession of land.

[Local Authority] reserves the right to terminate this agreement, and to seek to recover possession of the land through court proceedings, at an earlier date if the terms set out below in this agreement are breached.

I, and my family agree to adhere to the following terms:

1. You will be asked to park your caravan and vehicles in a designated place on the site. This is to prevent further caravans joining the encampment. Your family must stay within the boundaries of the site.
2. You will be issued with a toilet. This is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
3. You will be issued with a bin for all your domestic waste. You are responsible for keeping the area around your caravan clean and tidy. The bin is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
4. All dogs must be kept under control and tied up. Dogs must be tied up on a lead or in a kennel during the night or when you leave the site for any period of time. The dog wardens will visit this site if loose dogs are reported.
5. No fires larger than a small cooking fire are to be lit, absolutely no burning of commercial or domestic waste is allowed.
6. The nearest Household Waste for larger items is at Trade waste can be disposed at
7. Environmental enforcement officers will monitor the site and take action against any activity likely to cause environmental harm, inconvenience or distress to surrounding occupants such as fly-tipping, excessive noise or use of quad bikes.
8. Give consideration to other people within the local vicinity in terms of noise nuisance and the parking of vehicles.
9. Not to engage in any anti-social behaviour, disorder or fly tipping on or near this site. Horses will not be tolerated on the site and the presence of horses may be regarded as 'anti social behaviour' for the purposes of this agreement. Any traps owned by families are not to be used in or around the immediate area.

10. This agreement has been negotiated between [Local Authority] and Gypsy/Traveller people in the [local] area. You are encouraged to cooperate with the Local Authority to make the agreement work by discussing any incidents, concerns or suggestions that may affect the agreement with local authority officers when they visit weekly. You can also telephone the council [phone number], [police liaison officer] or speak to staff at [Third party advocacy where available] if you want them to raise issues on your behalf.

I understand the above points which have been explained to me, and I agree.

Signed.....date.....

Signed.....date.....(local authority)

Dependant Children