

# **Carlisle District Local Plan Examination**

Matters, Issues and Questions (MIQs)

## **Matter 4:**

Gypsy & Traveller Site Provision

## **Statement by Carlisle City Council**

November 2015



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**Q1. Does the GTAA provide a realistic assessment of the needs of the Gypsy and Traveller community? In particular:**

**(a) Is the allowance made for an annual 10% turnover on existing sites realistic and supported by evidence?**

**(b) Has in-migration to the area been assessed and included in the assessment of need?**

**1.1** An annual turnover rate of 10% was applied across the County for Gypsy and Traveller pitches. This was derived from the number of authorised pitches that had become available for occupancy in the preceding 5 years based on household survey evidence and the extent to which households occupying the pitches had a local connection (for instance they were from Cumbria or had family links with the area). This is slightly different to basing analysis simply on where households moved from as this can mask the complexity of nomadic lifestyles. It is important that connections to areas are considered given the nomadic nature of many Gypsies and Travellers, who often move back to areas where they have established links and this can include returning to their place of origin after travelling.

**1.2** The household survey asked respondents who had moved where they moved from and why – this resulted in being able to identify local connections.

**1.3** The actual number of pitches that had become available for occupancy was derived from the length of residence a household had been on an authorised pitch. Of respondents stating a length of residence (115), 77 had moved to their pitch in the preceding 5 years (or 67%). Further analysis identified that of those households moving, 74.1% had a local connection and 25.9% did not.

**1.4** The upshot of analysis is that there is an overall annual turnover of 13.4% but of this, 10% (9.9% to be exact) has been used to accommodate households with a local connection with Cumbria. This was the figure used in the GTAA needs assessment model as presented in Table 6.1 [EB 008]. For Cumbria, this results in an annual supply of 13 pitches and of these 8 are in Carlisle.

**1.5** Additionally, a further 3.5% of pitches annually become available through turnover but are occupied by households with no local connection to Cumbria, resulting in an annual supply of 5 pitches for Cumbria (3 in Carlisle).

**1.6** The calculations underpinning the 10% turnover are explained further in the following table:

**Table 4.1**

Summary Table explaining the derivation of the 10% turnover figure

<b>Summary Table</b>				
<b>Moving onto a pitch</b>		<b>Base</b>	<b>% moving</b>	<b>Notes</b>
Total households moving onto an authorised pitch in the past 5 years	77	115	67.0	From household survey. Base relates to total G&T households responding
All Authorised pitches		132		See Table 6.1 of GTAA report. This is the total number of authorised pitches.
<b>Origin/Connection of moving households</b>				
<b>Origin/Connection of moving households</b>		<b>Total pitches available through turnover(5 yrs)</b>	<b>Total pitches available through turnover (1 yr)</b>	
Originated or had connection with Cumbria	74.14%	66	13	Applies 67% of moving households to the total of 133 authorised pitches (so total turnover of 89 pitches over 5 years) and apportions by origin/destination
No connection	25.86%	23	5	
Total	100.0%	89	17	
<b>% Annual turnover</b>				
Originated or had connection with Cumbria			9.9%	Rounded to 10% in Table 6.1
No connection			3.5%	
Total turnover			13.4%	

## In-migration

1.7 An allowance is made for in-migration through the turnover figure. The modeling assumes that some of the pitches coming available through turnover are occupied by people moving to the area without a local connection. It is anticipated that 3.5% of pitches each year are occupied by households without a local connection. This results in 5 households each year without a local connection being accommodated across Cumbria (3 in Carlisle).

1.8 As the GTAA specifically focused on the needs from Gypsies and Travellers living in Cumbria, in-migration was not specifically mentioned in the report. However, the analysis of turnover takes this into account and therefore does not result in any additional need to be accommodated.

***Q2. The GTAA identifies a need for 15 pitches up to 2028 not 2030 as it has a base date position of 2013/14. In response to the Inspector's Initial Questions the Council confirms that the reference at paragraph 5.90 of the Local Plan to '2028' is a typographical error and should read 2030. However it would also be necessary to calculate the additional need for those two years. The Council has recently granted permission for an additional two pitches on an alternative site within the District. It suggests that this results in the residual unmet need between now and 2030 reducing to seven pitches. However, that would not take account of the additional two years of the plan period not already accounted for in the GTAA.***

***(a) Based on the methodology used in the GTAA, would the identified need between 2013 and the end of the Plan Period be 17 pitches? If so, even having regard to the two pitches that have since been granted planning permission, the identified need would remain 15 pitches over the plan period?***

1.9 This is correct – the identified need of 15 pitches over the period 2013/14 to 2027/28 gives an annualised need of 1 pitch each year. Therefore, extending the period to 2030 (2 extra years) would result in an overall need of 17. With the two permissions granted, this reduces the total need back to 15.

***(b) Unless 6 pitches have been granted elsewhere, the allocation of 9 pitches at Low Harker Dene would not meet the identified need over the entire plan period; they would meet a need for the first 9 years of the plan with windfall sites being relied upon to meet the remainder. Is this correct?***

**1.10** That would be a correct interpretation. However an additional 6 permanent pitches have been granted planning consent at Hadrian's Park (Application Ref 13/0886) which reduces the level of need from 15 to 9.

**Q3. *Low Harker Dene is an existing Council owned Gypsy site. The addition of 9 pitches will result in a large single site accommodating 24 pitches. The single allocation offers little choice to the Gypsy and Travelling community. The Sustainability Appraisal Report (SD003) confirms that no other sites were put forward for consideration.***

***(a) What efforts were made to ensure that the Gypsy and Travelling community were able to engage in the site selection process?***

**1.11** Carlisle has a good range of Gypsy and Traveller site provision with 10 sites currently in operation. These range from private individual family sites accommodating a single family unit to the larger scale Council and private sites providing a number of pitches to a range of families. The Council has a good track record of granting planning permission for Gypsy and Traveller provision with consent recently being granted for an additional two pitches to meet the needs of a growing family.

**1.12** Attempts were made through a call for sites to identify additional sites for allocation for Gypsy and Traveller provision and the only site received was already in operation and therefore not relevant to the process. As this site is in the ownership of the Council there is no question over its deliverability. Additionally the site adjacent (Low Harker Dene) has been successfully operating for a number of years and has an effective site management process in place – the expansion of the site to accommodate the additional pitches, should therefore result in continued effective management of the extended site.

**1.13** The stages and methods of public consultation used throughout the preparation of the Plan are set out in the Council's consultation statement [SD 007]. The Council



maintains a consultee database which contains contacts in a number of organisations associated with the Gypsy and Traveller community. These groups have therefore been made aware of all the stages of consultation including both call for sites and successive SHLAAs.

**1.14** It should be noted that the proposed Gypsy and Traveller site allocation is in a location where other Gypsy and Traveller families have chosen to establish their own sites. There are five licenced sites within the area which demonstrates that there is a desire within the Gypsy and Traveller community to be located within this area. In respect of the scale of the site the additional 9 pitches would result in a site of 24 pitches as stated. Indicative designs suggest 24 could be accommodated in a low density and therefore spacious and attractive manner, creating a good environment in which to live. In addition experience of sites in Carlisle indicate that there are no obvious issues with site size with one well established site operating successfully accommodating 40 residential pitches and 30 transit pitches.

**1.15** AWAZ- a Cumbria wide organisation which acts on behalf of BME people including Gypsies and Travellers were specifically engaged in the preparation of the Equality Impact Assessment (EqIA) [SD 012] of the Plan and therefore were fully aware of the aspects of the Plan which were of relevance to them. They raised no concerns over the site selection process and the site taken forward.

***(b) Is the site currently occupied by both Romany Gypsies and Irish Travellers and will the additional 9 pitches provide accommodation that is realistically suitable for both ethnic groups?***

**1.16** Table 2.2 of the Cumbria GTAA [EB. 008] shows that the County as a whole has a very small number of Irish Travellers (2.5%) reflecting the movement patterns and preferences of the Traveller community residing within and migrating to the County.

**1.17** The majority of the Low Harker Dene site is currently occupied by English Romany Gypsies with the exception of one family who are Scottish Gypsy Travellers.

**1.18** The existing Council owned Low Harker Dene is operating successfully providing good quality accommodation for 15 Gypsy and Traveller families. A needs based

approach is used for allocating pitches and no distinction is made between different ethnic groups. This appears to be a successful and wholly appropriate approach to allocating pitches and has not resulted in issues arising amongst different ethnicities on site. Whilst there may have been a few issues across the sites in Carlisle in the past these have been between certain families and individuals rather than due to different ethnic groups being situated together on a site.

**1.19** Additionally as stated in response to the question above no issues were raised through the EqIA about the location of the allocation or its suitability to accommodate both Romany Gypsies and Irish Travellers.

***Q4. Are the criteria set out in Policy HO11 consistent with national policy which requires criteria based policies to be fair and facilitate the traditional and nomadic life of Travellers whilst respecting the interests of the settled community (Planning Policy for Traveller Sites (PPTS) paragraph 10) and realistically likely to facilitate additional accommodation to meet the needs of the Gypsy and Traveller community?***

**1.20** The Equality Impact Assessment [SD 012] which accompanies the Plan was prepared in consultation with AWAZ. No concerns were raised about the policy wording or the location of the allocation.

**1.21** It is considered that the policy wording and criteria in the main are consistent with national policy and will facilitate additional accommodation to meet the needs of the Gypsy and Traveller community. The Council has recent evidence to support this through the recent granting of planning consent for two additional pitches which were assessed against the emerging policy.

**1.22** In response to question 6 (and for the reasons set out) it is recognised that the policy may benefit from amendment to the wording of criterion 8 to make the requirement for site management measures fair and proportionate to the scale of the site proposed.

***Q5. Policy C3 of the PPTS refers to sites in rural areas and the countryside. Is there tension between this policy and criteria 1 of Policy HO11 that requires sites to be physically connected to an existing settlement?***

1.23 It is not considered that there is a tension between the wording of criterion 1 of policy HO 11 and policy C of the PPTS. Policy HO 11 is underpinned by the principles of sustainable development in accordance with the NPPF and therefore it is considered appropriate that it states that sites do not lead to an unacceptable intrusion into open countryside. It is worth noting that there is consistency between Criterion 1 of policy HO 11 of the Plan and criterion 3 of policy HO 2 (windfall housing development). The PPTS is also very clear in policy H about new traveller site provision stating that local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements, which is in line with paragraph 55 of the Framework which states that local planning authorities should avoid new isolated homes in the countryside. This is consistent with the assessment criteria within HO 11.

***Q6. Is requirement (8) of Policy HO11 that requires proposals to include site management measures in proposals for all sites, including small family sites or single pitches, justified?***

1.24 Having reassessed the wording of this policy it is considered that criterion 8 of policy HO 11 may benefit from some amendment. The extent to which site management measures may be required will differ based on the size of the site and whether or not the site is for a small private family unit or a larger site open to a larger number of Gypsy and Travellers. It is therefore proposed that the wording of criterion 8 be amended to allow for flexibility enabling site management measures to be required 'where appropriate'. It would therefore instead read: 'site management measures are included within the proposals where appropriate'.

***Q7. What criteria in Policy HO11 would distinguish between circumstances when a pitch may only be suitable for a temporary period rather than providing permanent accommodation? Is such a distinction justified?***

1.25 Having reassessed Policy HO 11 it is considered that it should be amended to remove reference to meeting the delivery of "temporary" pitches. A formal modification

to this effect will be forthcoming from the Council. This reflects that there is no specific evidence which supports a need to make only temporary provision within the District and that the circumstances as to when temporary provision may be necessary are clearly set out within the PPTS with no need to repeat these locally.

***Q8. The Council makes no allocations for transit pitches within the LP. What justification is there for relying on this provision to come forward through windfall development, for example can the Council provide evidence of the past delivery of such transit windfall developments to demonstrate that future provision is realistic?***

**1.26** Carlisle has one 30 pitch transit site in operation at Hadrian's Park. No other transit sites are currently in operation. Despite this there has been a fall in unauthorised encampments within the District. The 2013 GTAA evidences a reduction in reported unauthorised encampments from the 27 reported in the 2008 GTAA, in a single year (2006) to the 39 reported in the 2013 GTAA, over a three year period from 2010/11. Figures for 2013/14 show a total of 11 unauthorised encampments, 2014/15 a total of 7 unauthorised encampments and 2015/16 a total of 14 unauthorised encampments however 7 of these were 1 large family group who were travelling with work and did not want to be accommodated on a site either temporarily or permanently within the District.

**1.27** Since 2012/13, the local housing authority has identified changes in the nature of unauthorised encampments; with fewer larger encampments (18 caravans plus) occurring alongside small family groups travelling. It is too early to say whether the changes in the nature of unauthorised encampments are a trend.

**1.28** Planning permission has recently expired for a 7 pitch transit site adjacent to Low Harker Dene, however this land remains available with additional space adjacent to provide for a larger transit site (to accommodate a total of 15 pitches) should this be required. The tender process for a culturally sensitive service provider to manage the permanent site at Low Harker Dene was structured to require the provider to develop and then manage the seven pitch transit site. The options for delivering transit provision in the District are however being reviewed, taking into account the changing pattern of need, evidenced from the growth in provision in the District reported in the twice yearly caravan count, a reduction in and changes in the nature of unauthorised encampments

and viability to ensure that delivery is cost effective from a capital and revenue perspective.

**1.29** What, however, is clear is that travelling is a complex phenomena that the local housing authority needs to understand to assist Gypsies and Travellers in maintaining their cultural practices, through appropriate provision that reflects the diversity of travelling. A failure to understand need and the diversity of travelling patterns, particularly across Cumbria as a whole, risks creating an inappropriate form of transit accommodation that has little or no impact on reducing unauthorised encampments and which is not cost effective.