

Note from Blaby District Council

Gypsy and Travellers and Travelling Show People - 'Unknown' Households

Introduction

Further to the hearing sessions, Blaby District Council has sought further advice from consultants ORS who produced the Leicester and Leicestershire Gypsy and Traveller and Travelling Show People Accommodation Assessment 2017 (GTAA).

The Inspector requested a note from the consultants to justify the assumption that nationally 10% of 'unknown' households meet the revised definition of Gypsies and Travellers as set out in Appendix 1 of the 2015 Planning Policy for Traveller Sites. This assumption is questioned by the National Federation of Gypsy Liaison Groups. Specifically, the Inspector asked whether the consultants have revisited any of the areas where they have previously undertaken interviews to find out whether the assumption is justified.

ORS Response

ORS have provided a response. This is set out in Appendix 1.

In summary, the response indicates that the 10% assumption is based on the number of interviews undertaken nationally to determine whether or not households that have been interviewed meet the definition for planning purposes as defined by national planning policy at the time that the GTAA was prepared.

Further Clarification from Blaby District Council

The Council considers that the 10% assumption is reasonable for 'unknown' households. However, the Council wants to clarify a number of points:

- The assumption has not been used to restrict provision for gypsies and travellers. It is simply an indication of the likely quantity of 'unknown' households that may meet the definition of gypsy and traveller.
- Paragraph 3.42 of the Delivery DPD seeks to show that if all the 'unknown' households were to meet the definition of gypsy and traveller the need may rise by 23 households for the period between 2016 and 2036. However, a significant proportion of the 'unknown' households are subject to ongoing enforcement investigations relating to breaches of planning conditions in terms of the use of sites by non gypsies and travellers. Taking account of the assumptions of the GTAA and the local evidence it is considered that the number of 'unknown' households who do meet the definition is likely to be at the lower end of the range.

- Paragraph 3.43 of the Delivery DPD indicates that there is sufficient supply for the period 2016 to 2021 for both households that do meet the planning definition and for 'unknown' households at the higher level of the range.
- The Council therefore considers that a broad locations and criteria based approach is the appropriate mechanism to make provision for longer term needs for gypsies and travellers who do meet the definition, 'unknown' households who subsequently do meet the definition and other applications that may come forward outside the level of defined need.
- The Council is supportive of proposed main modifications to ensure the policy is consistent with national policy in this respect.

Appendix 1 Response from ORS Consultants

From: Steve Jarman <[REDACTED]>
Sent: 14 August 2018 12:16
To: Gemma Yardley
Cc: Lucy O'Doherty; Thomas McGowan; Claire Thomas
Subject: RE: Request for further info for Blaby Local Plan Examination

Hi Gemma

Thanks for getting in touch and hopefully I can be of some assistance. [REDACTED]
[REDACTED].

The figure of 10% that was set out in the Leicestershire GTAA Report was based on the outcomes of approximately 1,800 interviews completed by ORS nationally since the revised PPTS was issued in 2015. At that time 10% of households that had been interviewed met the planning definition. This was consistent with data from interviews completed prior to the revised PPTS. The 10% figure is only meant as a guide to illustrate the potential levels of need arising from unknown households that are likely to meet the planning definition. We feel that it was more statistically robust to use the national figure based on 1,800 interviews as opposed to the local figure of 36% based on just 22 interviews. Using the national 10% would indicate a need of 2 additional pitches from the unknowns and using the locally derived figure of 36% would indicate a need for 8 additional pitches.

The ORS methodology to address the need arising from unknown households was supported by the Planning Inspector for a Local Plan Examination for Maldon Borough Council, Essex. In his Report that was published on 29th June 2017 he concluded:

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

It would be fair to conclude that a need of between 2-8 additional pitches is well within the realms of a criteria-based policy to deal with should any applications come forward.

In addition we have now completed a substantially higher number of interviews with Travellers across the UK (approximately 3,500 now) and the 10% figure is slowly rising and is now standing at around 25%.

I would be happy to pull together a more formal statement [REDACTED]
[REDACTED].

I hope this helps.
All the best
Steve

From: Gemma Yardley <[REDACTED]>
Sent: 14 August 2018 12:16
To: Steve Jarman <[REDACTED]>
Cc: Lucy O'Doherty <[REDACTED]>; Thomas McGowan <[REDACTED]>
Subject: Request for further info for Blaby Local Plan Examination

Dear Steve

Blaby District Council are currently in Examination for the Blaby Local Plan Delivery DPD. This includes a Broad Locations and criteria policy for accommodating Gypsy and Traveller and Travelling Show People.

The Inspector has queried whether the assumption in the Leicester and Leicestershire GTAA 2017 that nationally approximately 10% of households that have been interviewed meet the planning definition.

She has asked whether there is any further information to justify this approach. For example have you revisited any of the survey areas to find out whether or not the 'unknown households' numbers or percentage is justified/verified.

If you do not have such data, would you be able to provide further information as to how the 10% figure is derived and why it is it considered justifiable.

She has asked for a statement in this respect. Please can you confirm whether there will be a cost for this and if so, what would it be.

It would be useful to discuss. We have a some hearing sessions this afternoon and tomorrow but will try to give you a call in between.

Regards

Gemma Yardley
Principal Planning Policy Officer
[REDACTED]