

# Homework item #14 note on need for and supply of pitches for Gypsy & Traveller accommodation, with a point-by-point response to the critique of the ORS assessment in evidence of Alison Heine, and matching the need and supply figures for sites permitted since March 2017, which were already occupied and in temporary or unauthorised use.

## Introduction

1. This note responds to matters raised during the examination hearing session held on Friday 15 October 2021. The note should be read alongside the Council's Matter 3 Statement (¶¶ 9 - 25 [HPS/M3/03]) and the Council's response to the Inspector's Initial Questions (pgs 17 – 21 & appendix 1 [CEC/01])
2. The note has been split into sections, as follows: -
  - A point-by-point response has been prepared by Opinion Research Services ("ORS") to the critique of the Gypsy and Traveller Accommodation Assessment (GTAA) in evidence of Alison Heine [HPS/M3/08]. The response from ORS is included in Appendix 1 of this note.
  - A statement from Dawn Taylor, Manager of Cheshire and Warrington Traveller Team, on how sites were notified about the survey requirements from ORS for the GTAA – Appendix 2.
  - Section on need and supply figures for sites permitted since Match 2017, which were already occupied and in temporary or unauthorised use. This element of the note is considered below.

## Overview

3. The Council has, in line with Policy B of the Planning Policy for Travellers Sites, provided the necessary evidence to support their planned policy approach to Gypsies and Travellers and Travelling Showpeople in the Site Allocations and Development Policies Document (SADPD), as set out below:-
  - PPTS ¶8 – the Council has assessed Traveller needs in line with ¶62 and footnote 27 of the NPPF.
  - PPTS ¶9 – the SADPD, in policy HOU 5a and 5b includes clear pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople in line with the definitions included in Annex 1 of the PPTS, working collaboratively, through the preparation of the GTAA with neighbouring local planning authorities.

OFFICIAL

- PPTS ¶10 – the SADPD has through its policy approach;
    - a) Identified a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets included in the GTAA
    - b) Identified a supply of specific, developable sites
    - c) Prepared evidence on a cross-authority basis but identified the likely accommodation needs for Cheshire East
    - d) Through its site selection process, related the number of pitches / plots proposed as allocations to the specific size and location of the site and surrounding population
    - e) Through its site selection process and allocation wording, sought to protect local amenity and the environment.
  - PPTS ¶11 – through the policy approach in the SADPD, when read alongside policy LPS SC7 'Gypsies and Travellers and Travelling Showpeople', set a criteria based approach to guide decision making.
  - PPTS ¶12 – this paragraph is not applicable in a Cheshire East context.
  - PPTS ¶13 – the SADPD has through its site selection process tested the sustainability of sites and reflected any required mitigation, through specific allocation wording, to support the delivery of allocations in the borough.
4. The Council notes that the PPTS asks that local planning authorities:-
- make their own assessment of need for the purposes of planning (¶4(a) of the PPTS).
  - prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities (¶7(b)).
  - Set pitch and plot targets which identify the likely permanent and transit accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities (¶9).
  - Identify and update annually, a supply of specific deliverable sites, sufficient to provide 5 years worth of sites against locally set targets and identify a supply of specific deliverable sites (¶10 (a&b)).
5. In response to these requirements, a GTAA has been prepared to establish the likely permanent and accommodation needs of the area, working collaboratively with neighbouring local planning authorities. The need for pitches / plots from the GTAA has been reflected in policy HOU 5a and the

OFFICIAL

figures are presented as borough wide figures without a spatial element. This represents a locally set target.

6. The Council has prepared evidence, including through Appendix 1 of CEC/01, on its position on a supply of specific deliverable & developable sites, in line with the requirements of the PPTS.
7. The Council is also mindful that planning appeals have been allowed for new pitches for Gypsy and Traveller families from outside the area and who also fall outside of the need identified in the GTAA. However, in allowing the appeals, weight has been placed on the absence of a 5-year supply of sites. This is at odds with Mrs Heine's contention that only sites that very directly provide for the accommodation needs of individuals or families identified in the GTAA can form part of the 5-year supply.
8. In preparing this homework note, the Council is also aware of its obligations under the General Data Protection Regulation (GDPR) requirements and the need to ensure the survey data prepared to support the GTAA is used in a compliant way.
9. Following the Inspector's request for further information on the extent to which household needs identified through the GTAA matched the supply figures for sites permitted since 2017, the Council and ORS have provided the following list of sites, where the need for pitches was identified, focused on the five year supply position: -

Site name	Number of Pitches / Plots identified in the GTAA	Council's note on Site Supply
<b>Gypsies and Travellers</b>		
Land East of Groby Road	2	As confirmed in Appendix 3 of the Council's Site Selection Report (pgs 100 – 101, [ED 14]), the site at land east of Groby Road Crewe (ref GTTS 9) is not being actively promoted for expansion at the time of preparing the SADPD. No call for sites submissions were made to the Council. It should also be noted, that in the longer term, the site is near to proposed allocation (G&T 2), Land at Coppenhall Moss, Crewe. The proposed allocation at Coppenhall Moss is a Council owned site.

OFFICIAL

Newcastle Road, Betchton, Sandbach	1	As confirmed in Appendix 3 of the Council's Site Selection Report (pgs 100 – 101, [ED 14]), the site at Newcastle Road is not being actively promoted for expansion at the time of preparing the SADPD (Ref GTTS 11).
Meadowview, South of Dragons Lane, Moston	1	This site was a temporary site at the time of the GTAA. The site was promoted as an allocation (site G&T 7) in the initial publication draft SADPD. However, the site has been granted permanent planning permission, on appeal, on the 17 June 2019 for four pitches (ref 17/5170C). It is site reference 4 in the Council's Appendix 1 – response to the Inspector's Initial Questions [CEC/01]. This site is in close proximity to Thimswarra Farm (considered below).
New Start Park, Wettenhall Road, Reaseheath	9	This site was a temporary site at the time of the GTAA. The site is promoted as an allocation (site G&T 3) in the revised publication draft SADPD. However, the site has been granted permanent planning permission, on appeal, on the 28 January 2021 for 8 pitches (ref 18/2925N). It is site reference 13 in the Council's Appendix 1 – response to the Inspector's Initial Questions [CEC/01].
Thimswarra Farm, Dragons Lane, Moston	7	This site was a temporary site at the time of the GTAA. The site was promoted as an allocation (site G&T 6) in the initial publication draft SADPD. However, the site has been granted permanent planning permission, on appeal, on the 27 June 2019 for two pitches (ref 17/2114C). It is site reference 3 in the Council's Appendix 1 – response to the Inspector's Initial Questions [CEC/01]. It is also important to note that since the completion of the GTAA, there are a number of sites that have been permitted south of Dragons Lane, Moston. This includes site references 5, 8 and 10 in the Council's Appendix 1 – response to the Inspector's Initial Questions [CEC/01]. The site is in close proximity to the Meadowview (considered above).
John's Place, Dragons Lane, Moston	3	This was an unauthorised site in the GTAA. As above, since the completion of the GTAA, there are a number of sites that have been permitted south of Dragons Lane, Moston. This includes site references 5, 8 and 10 in the Council's Appendix 1 – response to the Inspector's Initial Questions [CEC/01].

OFFICIAL

Travelling Showpeople		
The Whites Showman's Site, A50, Newcastle Road, Brereton	1	This is a site that is being promoted for intensification in the SADPD, allocation site TS3 (land at former brickwork, A50, Newcastle Road for two additional plots.
Booth Lane, Middlewich	3	This was an unauthorised site in the GTAA. There is an allocation for three plots at a Council owned site in Knutsford. Proposed allocation TS 1 (Lorry Park, Off Mobberley Road, Knutsford.

Table 1: Pitches / Plots Site Information

### Conclusion on site supply

10. As set out above, the Council has followed the guidance set by the PPTS in establishing its policy approach (including making allocations) for Gypsy and Traveller and Travelling Showperson sites in the Borough. This is set out in ¶¶3-6 of this note.
11. Following a specific request from the Inspector, Table 1 sets out how household needs identified through the GTAA matched the supply figures for sites permitted since 2017. This demonstrates that a large proportion of needs identified are being met by the SADPD.
12. In addition, the Council has set out a clear criteria-based approach in the SADPD to consider proposals as they arise in the borough in line with ¶11 of the PPTS.
13. The Council would also note that it has a clear monitoring framework as outlined in paragraph 8.30a of the Revised Publication Draft SADPD to monitor the effectiveness of the policy either as part of a Local Plan update or if there are any significant changes in the requirements for pitch provision, identified through monitoring, changes in national planning policy or as evidenced, for example, through a review of the GTAA.

## **Opinion Research Services (ORS) Response to Cheshire East Local Plan Consultation Representations**

**October 2021**

### **Background**

Opinion Research Services (ORS) have been instructed by Cheshire East Council to provide a response to representations made during the Cheshire East Local Plan Examination process in relation to the policy approach in the Site Allocations and Development Policies document for Gypsies and Travellers and Travelling Showpeople.

### **Issues Raised in Representations**

In summary, this note has been prepared for the Inspector, in response to the matters raised by Heine Planning Consultancy.

The representations made by Heine Planning cover a range of issues relating to the Gypsy and Traveller Accommodation Assessment (GTAA) that was completed for Cheshire East Council, Cheshire West and Chester, Halton Borough Council and Warrington Borough Council by ORS that was published in its final version in August 2018.

They also cover specific issues relating to Policy HOU5 in the Submission Local Plan in relation to concerns over how the Policy seeks to meet the identified need for new Gypsy and Traveller pitches and Travelling Showmen's plots.

ORS are only in a position to respond directly to issues relating to the GTAA and not to provide responses to specific issues that have been raised in relation to Policy HOU5.

Specific issues raised in the representations, from Heine Planning Consultancy, that ORS are in a position to respond to are:

- That the GTAA is out-of-date and that the method for assessing need from unknown (now referred to as undetermined) households has changed.
- The low interview rate achieved during the GTAA fieldwork period.
- That the site baseline for the GTAA is not correct.
- How the PPTS (2015) planning definition of a Traveller has been applied.
- Allowance for in-migration.
- Need from households that do not meet the planning definition of a Traveller.

ORS would note that Paragraph 4(a) in the Planning Policy for Traveller Sites (PPTS) 2015 requires local planning authorities to make their own assessment of need for the purposes of planning but sets out no guidance on how this should be completed. ORS have completed GTAAs covering over 140 local planning authorities in England since the 2015 PPTS was published. An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded:

*...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.*

**Response from ORS**

My name is Steve Jarman and I have been a Senior Research Executive for Opinion Research Services (ORS) since May 2013. Previous to that I had over eighteen years' experience in Local Government at both a senior and managerial level. This covered all aspects of consultation, engagement, research and information, and policy development, across the full range of local government and other public-sector services. Formerly as manager of Cardiff Council's own in-house research consultancy, I had responsibility for developing and implementing a wide range of consultation and community engagement initiatives. I have extensive experience of project managing large-scale strategic and sensitive consultation exercises, the implementation of qualitative and quantitative research methods, evidence-based policy development, and data analysis and interpretation.

Also, as a qualified Planner, I have a sound knowledge of the policy and legislative frameworks that relate to local government and the wider public sector, as well as in-depth knowledge of policy, legislation and case law relating the Travelling Community.

I have a BSc in City and Regional Planning from Cardiff University (1994), a Post Graduate Diploma in Town Planning from Cardiff University (1996), and a Post Graduate Certificate in Sustainable Leadership from the University of Wales Institute Cardiff (2010).

I now lead on the Gypsy and Traveller Accommodation Assessment Portfolio for ORS and have been responsible for GTAA's covering over 140 local authorities in England and Wales. Since changes to Planning Policy for Traveller Sites (PPTS) in 2015, ORS are working on or have completed studies for a large number of local authorities across the UK including Cheshire (4 local authorities - including Cheshire East), 20 London Boroughs, Central Bedfordshire, Bedford, Milton Keynes, Luton, the majority (8) local authorities in Hertfordshire, Kent (4 local authorities), Buckinghamshire (4 local authorities), Cambridgeshire Region (7 local authorities), Dorset (7 local authorities), Essex Region (14 local authorities), Gloucestershire (6 local authorities), the majority (9) local authorities in Hampshire, Leicestershire (8 local authorities), Northamptonshire (7 local authorities), Oxfordshire (5 local authorities), South West England (4 local authorities), the majority (7) local authorities in Surrey, and West Sussex (6 local authorities) - making ORS the largest provider of such studies in the country

I am instructed by the Cheshire East Council to support the Council in the Local Plan Examination. My response deals specifically with the accommodation needs for Gypsies, Travellers and Travelling Showpeople, and the Cheshire East, Cheshire West and Chester, Halton, and Warrington GTAA – August 2018.

**ORS Response to Specific Points Raised in Representations from Heine Planning Consultancy**

**1. Out of date and the method of assessing unknown households has changed**

Whilst the GTAA has a baseline of May 2017, the overall methodology used to complete the assessment has been found to be robust. An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded:

*...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.*

At the time of the Cheshire GTAA ORS had completed interviews with approximately 2,500 Gypsy and Traveller households living on sites across England. The outcomes of these interviews suggested that approximately 10% of these households met the PPTS (2015) planning definition of a Traveller. ORS have now completed over 5,000 interviews with Gypsies and Travellers and the proportion of households that meet the planning definition is now approximately 30%.

Paragraph 8.4 in the GTAA recommends that the Council should not allocate to meet need from unknown households and should instead make use of a Local Plan Criteria-Based Policy as set out in the PPTS. Policy HOU5 includes a criteria-based policy to meet this need. Therefore, the % of households that meet the planning definition is not seen as an issue in this case and the criteria in Policy HOU5 are able to meet any need from unknown households – whether at 10% or at 30%.



## 2. Low interview rate

The representations from Heine Planning contend that the interview response rate for the GTAA was low and that only 40 interviews were completed with Gypsies and Travellers – giving a response rate of 33%. It goes on to claim that the low response rate could be attributed to the timing of the fieldwork that was completed between April and October when many households may have been away travelling.

Paragraphs 3.7-3.12 in the GTAA set out in detail the approach taken to complete the household interviews with members of the Travelling Community in Cheshire. This is in line with the requirements of the PPTS, as well as the more recent revised NPPF (Paragraph 31 - *The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.*

Up to 3 visits were made to each site during the fieldwork period. This is felt to be a reasonable and proportionate approach to seek to maximise opportunities to engage with households living on sites. Closer scrutiny of the outcomes of the interviews shows that the majority of sites were in fact occupied when they were visited and that households were not away travelling.

However, the owners of a number of the larger private sites in Cheshire East refused outright to allow access to Researchers from ORS to complete interviews with any households living on these sites. When these refusals are taken into consideration the GTAA achieved a robust contact rate of 76%.

Paragraph 3.16 of the GTAA sets out that whilst the wider fieldwork period ran from April to October 2017, the majority of the fieldwork was completed in April and May 2017 which is before the main travelling season commenced, and the majority of sites were occupied at that time.

The representations also make reference to a GTAA that was completed by ORS in the London Borough of Havering. It should be noted that there were very different circumstances when completing the GTAA in Havering as is very often the case when completing GTAAs in different local authorities, and that it would be wrong to try and draw parallels with the Cheshire East GTAA.

Heine Planning also contend that the higher response rate achieved in Havering resulted in a higher proportion of households meeting the PPTS planning definition, who were initially recorded as unknown. This may have been the case in Havering, but this cannot also be assumed to be the case in Cheshire East. Havering is characterised by a large number of small private family sites, whilst the majority of the sites where it was not possible to complete interviews in Cheshire East were large sites (Nantwich Road – 16 pitches, Newcastle Road – 25 pitches, and Three Oakes Caravan Park – 24 pitches). Work undertaken by ORS across England suggests that the majority of households on larger sites such as these do not meet the PPTS planning definition. In addition, in circumstances where site owners refuse access to complete interviews with households, ORS often determine that these sites may not in fact be occupied by Travellers and that this is the reason for the refusal to complete interviews.

### **3. Omission sites**

The representations make reference to an unauthorised site at Spinks Lane that was omitted in the GTAA. However, the GTAA does include this site, although the residents refused to take part in an interview – see Figure 15 in the GTAA.

It also makes reference to households living in caravans at residential dwellings and makes a specific reference to 2 applications that were submitted in 2018 and 2019 – both after the publication of the GTAA.

Paragraphs 3.13-3.15 in the GTAA set out the approach that was taken to seek to engage with households living in bricks and mortar during the completion of the assessment. Despite all of the efforts that were made no households were identified to interview.

**4. Methodology changed with respect to interpretation of PPTS definition and failure to reconsider the outcome of the report now that further information is available**

The GTAA contains detailed information on how the PPTS planning definition of a Traveller has been applied and this approach has been supported by Inspectors at numerous Planning Appeals and Local Plan Examinations (see Paragraphs 2.10-2.21 in the GTAA).

The representations go on to make reference to ORS not including those households who stated that they travelled to visit horse fairs as meeting the planning definition. Question F3 (Appendix F in the GTAA Report) asks what the main reasons for travelling are and allows households to give a number of different reason for travelling – one of which is to attend fairs. The question also contains specific instructions to Interviewers to probe any responses to determine whether their travelling to fairs (and for other reasons) involves any work or seeking work.

The representation also make reference to a number of permissions that were allowed at appeal since the publication of the GTAA. These have all been determined on their own merits in relation to the planning definition of a Traveller and would be considered should a new GTAA be commissioned by the Council.

ORS have a clear view about this. Planning agents need to be confident that their clients will meet the planning definition before deciding to submit an appeal against the refusal of planning permission or against an enforcement notice. This means that it was highly likely that appellants at the appeals referred to in these examples would seek to provide evidence claiming to meet the planning definition. Therefore, ORS are of the opinion that evidence presented at appeals is already heavily weighted towards households meeting the planning definition.

## **5. Low allowance for in-migration**

Another point made by Heine Planning in relation to the GTAA relates to in-migration. Paragraphs 7.15 and 7.16 in the GTAA set out how the assessment addresses issues relating to in-migration, and that only identified in-migration is taken into account. The assessment of need for Cheshire East identified 3 households living in other local authorities with a need to be living on family sites in Cheshire East. Other than these, the GTAA recommends that should any households from outside of the study area wish to develop a new site the proposal will need to be considered by criteria-based Local Plan Policies.

Reference is made to a number of sites where it is contended that occupants have come from households moving into Cheshire East, but the majority of these are all after the baseline date for the GTAA and appear to have been dealt with appropriately by the use of criteria-based policies or through the appeal process.

## 6. Does Policy HOU5 provide for cultural need

The final point that ORS will respond to relates to the representations from Heine Planning that contend that Policy HOU5 fails to make any allowances or allocations for those households that do not meet the PPTS planning definition of a Traveller – cultural Gypsies and Travellers.

Firstly, it is the view of ORS that Policy HOU5 does provide for any need from undetermined households through the inclusion of a detailed set of development management criteria. Paragraph 3.29 in the GTAA includes a reference from the Inspector for the last Local Plan Examination in Maldon and in summary sets out that *'It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.'* In short, the Inspector set out that it would not be appropriate to include any specific allocation in the Local Plan to address potential need from unknown households.

In relation to need from households that do not meet the PPTS planning definition, Paragraph 62 of the revised NPPF (2021) states that [emphasis added] *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, **travellers**, people who rent their homes and people wishing to commission or build their own homes'.* The footnote to this section states that *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*

It is very clear from reading the revised NPPF, The Housing Delivery Test Measurement Rule Book and the PPTS, that the needs of households that do not meet the PPTS planning definition should be addressed in a Local Plan as part of the wider housing needs of an area.

## Conclusions

The ORS GTAA approach has been repeatedly assessed as robust, including through Local Plan Examinations including in Bedford, Blaby, Cambridge, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Herts, Gloucester, Hart, Maldon, Milton Keynes, Newham, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.

An Appeal Decision for a Hearing in Central Bedfordshire that was issued in March 2020 concluded:

*...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.*

ORS have provided evidence to show that the PPTS (2015) planning definition of a Gypsy, Traveller and Travelling Showperson has been properly applied and that GTAA's do not now need to include a formal assessment of need for households that do not meet the definition. ORS do complete this assessment, however, to provide our clients with an overall picture of need for the Travelling Community – an approach now supported by the revised NPPF (2021).

ORS have significant experience in completing GTAAs and are probably the best placed consultancy in the country to assess households against the current planning definition of a Traveller based on the outcomes of robust household interviews completed by experienced Researchers.

Overall, taking all of these points into consideration, the overall accommodation needs for Gypsies and Travellers in Cheshire East that has been identified by the GTAA is accurate and robust, and in line with national policy and guidance – including that issued after the GTAA was published (the revised NPPF 2021).

## Appendix 2: Statement from Dawn Taylor, Manager of Cheshire and Warrington Traveller Team

I am Dawn Taylor, the manager of the Cheshire and Warrington Team (CWTT), I have held this position since 2015. I have worked across the Cheshire authorities with the Gypsy Traveller communities, since 2005 and have commissioned 3 Gypsy and Traveller Accommodation Assessments (GTAA), the last one being published in 2018.

Part of my role has been to engage with the Gypsy and Traveller communities within each of the partnership authorities, Cheshire East, Cheshire West, Halton and Warrington Borough councils. Prior to the start of the GTAA each Traveller site was visited, and information given out in regard to the accommodation assessments. I have attached both the letter from myself and the information from the Friends, Family and Travellers, a national Gypsy/Traveller organisation.

Dawn Taylor  
Cheshire and Warrington Traveller Team Manager  
28<sup>th</sup> October 2021

## **New Gypsy Traveller Accommodation Assessment**

Hello the council wants to inform you that we are undertaking a new Gypsy and Traveller Accommodation Assessment (GTAA) starting 18<sup>th</sup> April.

You will be contacted by representatives from ORS who will carry out surveys about accommodation needs. The last one was done in the summer of 2013.

The flyer has been done by Friends Family and Travellers (FFT) and covers the issues around the new definition of Gypsy and Traveller. This definition was introduced in the 2015 Planning policy changes.

If you have any concerns you can contact Irish Community Care on 0151 237 3987 or come to drop-in on a Tuesday morning at the council offices in Ellesmere Port. You can also phone the Cheshire and Warrington Traveller Team on 0300 123 7727

Thanks

Dawn Taylor

Cheshire and Warrington Traveller Team Manager

0151 3566411



# MORE PITCHES PLEASE!


Councils are currently carrying out new  
Accommodation Needs Assessments.


The assessments are being done to  
work out if there is a need for more


Gypsy/Traveller sites in your area and it  
is really important that you take part in  
the process so that your Council

identifies the true level of need for sites  
in your area.



 Your council will almost certainly employ consultants to carry out the assessment and you will probably be asked to complete a questionnaire.

 **How you answer the assessment questions is really important as it will affect the number of pitches required in an area.**

 **Questions about travelling are particularly important.**

In 2015 the Government changed the planning definition of what it means to be a 'Gypsy or Traveller' and it now reads as follows:


**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.**


**This means that if you have completely stopped travelling**, even if it is as a result of ill-health or old age or because you care for people who are too old or too ill to travel then you will be unlikely to meet the planning definition and any need you or your dependants have for a caravan site will no longer be included in the Council's assessment of its need for Gypsy/Traveller sites in your area.






**So, if you are still travelling for work, even if it is only for part the year or in order to buy and sell goods at any of the traditional horse fairs etc. then it is essential you make that clear to your Council when it assesses its need for sites in your area.**


 **We have already seen some examples of questionnaires** being used by consultants to assess needs and have some concerns about the way in which the questions have been worded and the limited space on forms to give answers.

 For example, on a form produced by ORS questionnaire there is a section in the questionnaire about travelling (Section F) which could cause people to give misleading answers.


**For example, one question asks ‘How many trips you have made in the last 12 months’**

If you answer ‘0’ to this question then you will probably not be deemed a Gypsy or Traveller according to the new planning definition, so don’t forget to include trips such as for work, looking for work, going to horse fairs etc. 

**Another question asks ‘When did you stop travelling’**

Please think carefully before answering such a question. Have you stopped travelling for good? If so then you could be judged not to be a Gypsy or Traveller in planning terms. 

**Another question asks ‘Have you or family members ever travelled?’**

If you answer ‘No’ to this question then you will be probably be judged not to be a Gypsy or Traveller in planning terms. So again don’t forget to include trips looking for work, visiting horse fairs etc. 

**Finally, a question asks ‘Do family members plan to travel in the future?’**

Again, please bear in mind that if you answer ‘No’ you will be judged not to be a Gypsy or Traveller in planning terms, so think carefully about whether you are ever likely to be travelling again in the future. 