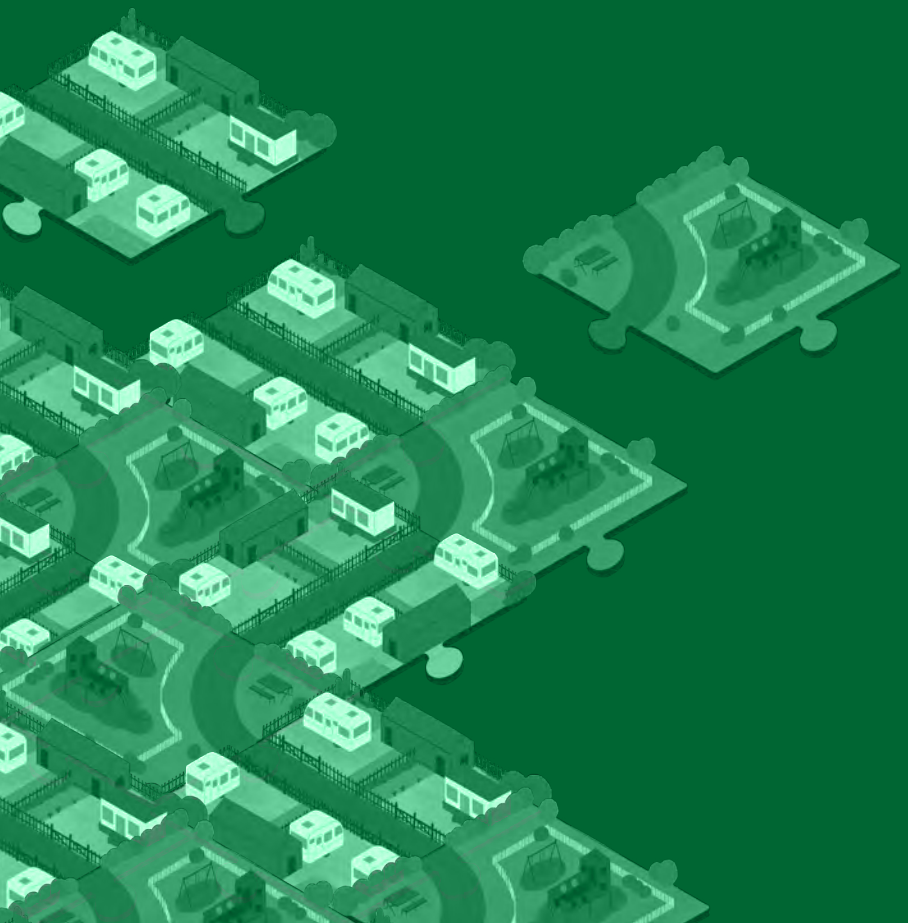
FRIENDS, FAMILIES & TRAVELLERS

Kicking the can down the road:

The planning and provision of Gypsy and Traveller sites in England 1960-2023

Dr Simon Ruston MRTPI
for **Friends, Families and Travellers**



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November 2023

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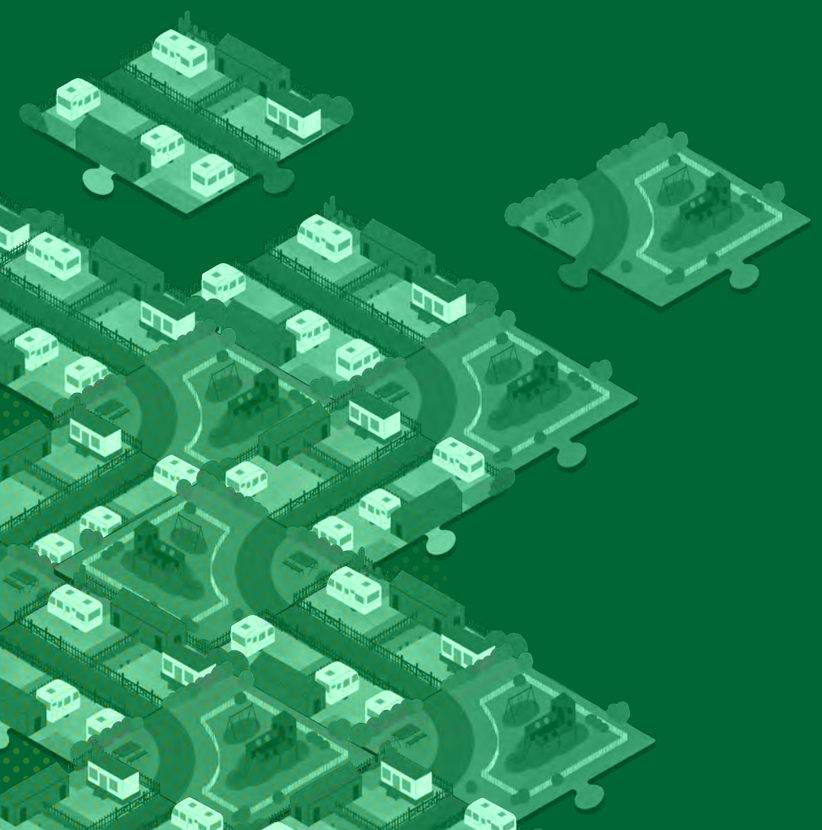
Charity number: 1112326

Dedication to Steve Staines (1947 – 2022)

Steve founded Friends, Families and Travellers over 25 years ago, in response to what became the Criminal Justice and Public Order Act 1994, and the effect on Travellers.

Steve worked tirelessly on planning issues and was one of the early pioneers of considering how the planning system addressed the needs of Gypsies and Travellers.

Table of Contents



FRIENDS, FAMILIES & TRAVELLERS

Executive summary

Gypsies and Travellers are an important part of Britain's population, heritage and social fabric. Providing well-designed and managed sites for Gypsies and Travellers supports happy and healthy communities and addresses wider determinants of health, education and employment.

There is a direct correlation between accommodation insecurity and health outcomes. With Gypsy and Traveller communities having life expectancies between 10 and 25 years shorter than the general population, there is a strong case for site provision.

Furthermore, 2021 Census data indicates that many within the Gypsy and Traveller communities need socially provided accommodation, with 44% of Gypsy and Traveller Census respondents renting in social housing, compared with all ethnic groups at 17%. As such, it is important that there is a wide choice of homes available for Gypsy and Traveller communities.

This report is concerned with the provision of Gypsy and Traveller sites through the planning system since 1960, with a specific focus on the period from 1994 to the present day.

The period from 1960-2023 can be broadly summarised as follows:

1960 – The closure of traditional stopping places.

1968 – The creation of a statutory duty to provide sites.

1994 – The revocation of the statutory duty to provide sites.

2006 – The instigation of a regional approach to Gypsy and Traveller site provision.

2011 – The revocation of a regional approach to Gypsy and Traveller site provision.

2015 – The exclusion of a significant part of the Gypsy and Traveller population from the assessment and provision of sites through the change in definition within the national Planning Policy for Traveller Sites (PPTS 2015).

2022 – A ruling in the Court of Appeal that the PPTS 2015 definition was tainted with discrimination.

The report looks at these key moments in time for Gypsy and Traveller site provision, giving an overview of the impact of the changes.

The research then goes on to look at 100 local planning authorities and makes the following key findings (amongst other matters):

- Of the 100 local planning authorities where information was available, 64% had failed to allocate sites as part of the development plan process despite 29 years of government policy and guidance that required this.
- There were 149 socially-provided sites across the 100 local planning authorities and of these sites, 119 were built before 1994, and only 30 since then (after the statutory duty to provide sites had been revoked).

The research then looks in more detail at 15 different local planning authorities and from this makes the following findings:

- Even though a local planning authority may have a 5-year land supply (or near to) for Gypsy and Traveller sites, planning appeal inspectors were finding that there was a lack of alternative sites. As such, the presence or otherwise of a 5-year supply is a poor indication of whether or not a local planning authority is meeting its need.
- In some cases, there was evidence that the needs of Gypsies and Travellers in bricks and mortar were being missed in accommodation needs assessments.
- One company undertaking Gypsy and Traveller Accommodation Needs Assessments was consistently using 'turnover' on pitches as a form of supply. This approach is methodologically problematic and results in figures being artificially reduced.
- Two of the local planning authorities relied upon private sites to meet the need for Gypsy and Traveller pitches, despite evidence to suggest that social provision was required.
- In two areas, Gypsy and Traveller sites which had been allocated in the local plan for use had not been constructed.
- In a number of cases, local plans had been adopted without site allocations for Gypsies and Travellers, on the basis of commitments from local planning authorities to meet the need in future documents, that did not materialise.
- In areas where there had been no provision for Gypsy and Traveller sites for many years, despite there being identified need, there was no real consequence for the local planning authority.
- The Green Belt is a significant constraint to the provision of sites. In areas with a significant proportion of Green Belt, the consequences of not allocating sites led to multiple temporary permissions and in one case a large scale and costly eviction.

The report identified the following good practice:

- In Preston, the local planning authority took the step of purchasing an existing site from the county council. This allowed for the residents to form a co-operative to manage the site themselves.
- In Leeds and Bristol, sites have been established without planning permission on unused public land in order to address immediate need.
- In Leeds, a negotiated stopping model allowed for transit provision to be made on a flexible basis.
- In some areas where local Gypsy and Traveller advocacy organisations were involved in the planning process / campaigning for sites, provision was made.
- Where local planning authorities committed time and resource to provision, progress on site provision was made.
- Four local authorities had made direct provision without going through a site allocations process, which was a pragmatic approach to provision.
- Where elected politicians showed leadership on Gypsy and Traveller accommodation provision, tangible progress was made.
- The regional planning process that was abolished in 2011 was an effective means for scrutinising local planning authorities' approach to Gypsy and Traveller site provision.
- Only 2 out of 15 local planning authorities explicitly addressed the issue of social provision. Given that a larger proportion of Gypsies and Travellers live in socially provided accommodation (including bricks and mortar housing) this should be a key consideration for councils.

The report then makes the following primary recommendation:

- To introduce a statutory duty to provide sites. Such a duty should also exist alongside proper funding measures. With a reasonable approach, to both location and funding, this could be the single biggest transformative measure for Gypsies and Travellers in England.

Further recommendations to increase and improve Gypsy and Traveller site provision include:

- That following the judgment in Lisa Smith v The Secretary of State for Levelling Up, the Planning Policy for Traveller Sites 2012 definition should be restored.
- That new detailed guidance on Gypsy and Traveller Accommodation Needs Assessments should be issued.
- The 5-year supply of sites figure, should be set for publicly owned sites by local authorities only, as it is a poor indicator of pitches being available for occupation. Private provision should be measured against the general need figure. This measure will ensure that public provision is made.
- In locations with regional government with planning functions, oversight of Gypsy and Traveller provision should be a responsibility at the strategic level plan.
- Local planning authorities should seek to engage with local Gypsy and Traveller communities and organisations as much as possible.
- Where there is an identified need for public sites, this should be met through direct provision rather than through site allocations. This will ensure that sites are built in a timely manner and will not be delayed by lengthy local plan processes.
- In areas constrained by Green Belt, national policy should be amended to state the need for public sites is capable of outweighing the harm to the Green Belt, so as to establish very special circumstances.
- In order to ensure Gypsy and Traveller needs are met, Local Plans should not be found to be sound unless the public need for sites has been addressed either through allocation or direct provision, and that there are sufficient allocations to meet a significant percentage of the private need.
- National planning policy on Green Belt should be amended, in order to be more permissive of sites in areas which are subject to significant constraints which cause issues in the identification and provision of sites.
- All local authorities should have a 'negotiated stopping' policy, in order to meet the needs of Gypsies and Travellers passing through their area.
- That models of good practice are shared and accessed through existing networks and forums such as the National Policy Advisory Panel, to support social housing providers in improving and increasing site provision.

Glossary

Abbreviation	Full title/name	Further information
PPTS	**Planning Policy for Traveller Sites**	The Government's planning policy for Traveller sites.
NPPF	**National Planning Policy Framework**	The Government's planning policies for England and how these are expected to be applied.
LPA	**Local Planning Authority**	Planning department for local government.
GTANA/GTAA	**Gypsy and Traveller Accommodation Needs Assessments**	An assessment to identify the need for Gypsy and Traveller pitches in a local authority area.
DPDs	**Development Plan Documents**	The statutory parts of the local development framework, such as area action plans and site-specific allocations.

INTRODUCTION

This report addresses the subject of Gypsy and Traveller law and policy on planning from 1960 onwards. This can be very broadly summarised in the following points:

- **1960:**
  The closure of traditional stopping places;
- **1968:**
  The creation of a statutory duty to provide sites;
- **1994:**
  The revocation of the statutory duty to provide sites;
- **2006:**
  The instigation of a regional approach to Gypsy and Traveller site provision;
- **2011:**
  The revocation of a regional approach to Gypsy and Traveller site provision;
- **2015:**
  The exclusion of vast swathes of the Gypsy and Traveller population from the assessment and provision of sites through the change in definition within the national Planning Policy for Traveller Sites (PPTS 2015);
- **2022:**
  A ruling in the Court of Appeal that the PPTS 2015 definition was tainted with discrimination.

  This history is littered with multiple policy attempts to address the need for more sites, all with varying degrees of success.

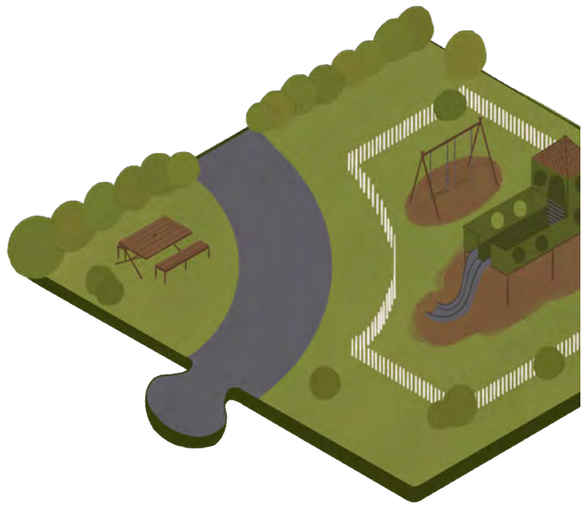
This report examines site provision in three parts:

Part 1 The history of Gypsy and Traveller site provision policy and law 1960-2023;

Part 2 Looking at the evidence, by considering 100 local planning authorities, with a specific focus on 15, how effective have local authorities been in meeting the accommodation needs of Gypsies and Travellers, since the revocation of the statutory duty to provide sites in 1994;

Part 3 Finally, it will ask if the post-1994 system as a whole has worked and if not, what would work?

Before doing this, we will set out why any of this matters.



Why does Gypsy and Traveller site provision matter?

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Gypsies and Travellers are an important part of Britain's population, heritage and social fabric. Their resilience over hundreds of years shows these communities, despite many forms of oppression, are here to stay.

Gypsies and Travellers have a long tradition of living in caravans, with this being as much a part of the cultures of Gypsies and Travellers as travelling itself. Many Gypsies and Travellers may no longer be able to live nomadically but the desire to live nomadically remains alive for many. Many of the Gypsies and Travellers who live in caravans have a strong cultural aversion to conventional housing. It has been recognised by the High Court that, for such people, bricks and mortar would be as unsuitable as a *"rat-infested barn"*[1].

Therefore, providing well-designed and managed sites for Gypsies and Travellers supports happy and healthy communities and addresses wider determinants of health, education and employment.

There is a direct correlation between accommodation insecurity and health outcomes. With Gypsy and Traveller communities having life expectancies 10 to 25 years shorter than the general population, there is a strong case for site provision.

Furthermore, 2011 Census data indicates that many within the Gypsy and Traveller communities need socially provided accommodation, as evidenced below:

Gypsy/ Traveller:

All ethnic groups:

A recently published Census 2021 analysis shows reliance and a need for socially rented accommodation: 'Other higher rates of social rent were in the *"White: Gypsy or Irish Traveller" ethnic group (44%)'*. As such, it is important that there is a wide choice of homes available, that are culturally appropriate, for Gypsy and Traveller communities.

[1] Clarke v Secretary of State for the Environment, Transport and the Regions [2002].

PART 1:

THE HISTORY OF GYPSY AND TRAVELLER SITE PROVISION POLICY AND LAW 1960-2023

INTRODUCTION

To understand the current situation for Gypsies and Travellers, it is important to consider the historical development of law and policy on the provision (or otherwise) of sites.

To do this, it is necessary to go back to 1960 and the enactment of the Caravan Sites and Control of Development Act, and work through to the present date.

The closure of the commons in 1960

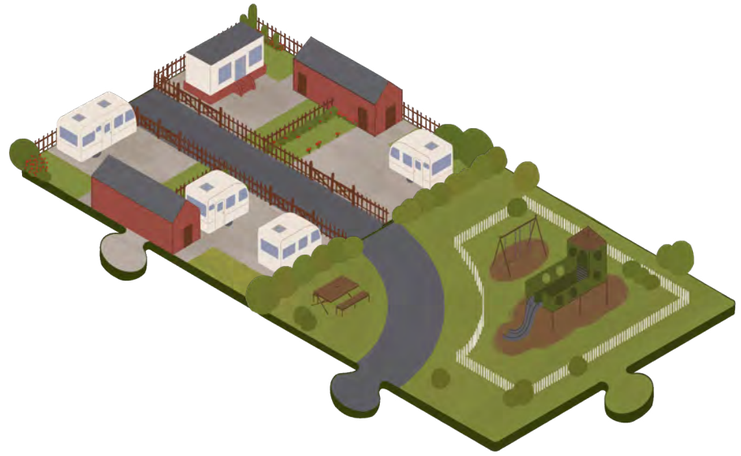
The main purpose of the Caravan Sites and Control of Development Act 1960 was to introduce a tighter system of control over caravanning in general. This was due to the increasing number of (non-nomadic) people using caravans for holidays or for permanent homes, and the increase in sites being opened in unsuitable locations with inadequate facilities. This purpose was achieved in part by the introduction of a requirement for caravan sites to have both planning permission and a site licence. Sites deemed to be unsuitable by a local authority were then shut down[2]. The Act did however also give local authorities a power to build sites.

Although the Act has no specific mention of Gypsies or Travellers, its provisions had an impact on these communities, and has been described as possibly being the lowest point for Gypsies and Travellers in the post-war period[3]. Section 23 allowed rural district councils to prohibit the stationing of caravans on common land. This had the effect of closing down many traditional stopping places (ibid). Existing Gypsy and Traveller sites were in many cases shut down and the Gypsy Council claimed in 1971 that more pitches had been closed down by the Act, than had been created by the duty to provide sites created by the 1968 Act[4] (as covered below[5]). Okely[6] details its implications in stark terms:

FRIENDS, FAMILIES & TRAVELLERS

> *The Gypsies were the victims of the 1960 Caravan Sites and Development Act [sic], which was not specifically addressed to Gypsies but apparently aimed mainly at the increasing number of non-Gypsy house dwellers resorting to caravans during a housing shortage.*
>
> *The Gypsies, for whom caravans are the preferred abode, were subject to the universalistic and inflexible law of the dominant house dwelling society.*

The 1960 Act was effectively the start of Gypsies and Travellers needing to either provide for themselves or be provided for as a result of the closing of the commons and traditional stopping places.



[2] Adams, B., Okely, J., Morgan, D. and Smith, D. (1975) Gypsies and Government Policy in England: A Study of the Travellers' Way of Life in Relation to the Policies and Practices of Central and Local Government. London: Heinemann Educational.

[3] Greenfields, M. (2006) Stopping places. In: Clark, C. and Greenfields, M., eds. (2006) Here to Stay: The Gypsies and Travellers of Britain. Hatfield: University of Hertfordshire Press, pp.57-89.

[4] The 1960 act introduced a power for Local Authorities to open sites, after eight years of few authorities using this power, it became a duty under the 1968 Act.

[5] Adams, B., Okely, J., Morgan, D. and Smith, D. (1975) Gypsies and Government Policy in England: A Study of the Travellers' Way of Life in Relation to the Policies and Practices of Central and Local Government. London: Heinemann Educational.

[6] Okely, J. (1983) The Traveller-Gypsies. Cambridge: Cambridge University Press.

The first Government guidance on site provision – Circular 6/62

Following the 1960 Act, a Ministry of Housing and Local Government Circular was sent out to County Councils in 1962. It called for surveys of itinerants and Gypsies living on unauthorised sites and drew attention to the power of site provision. The Circular was almost completely ineffective[7].

The duty to provide sites – Caravan Sites Act 1968

The 1968 Act introduced a duty for councils to provide sites for Gypsies and Travellers residing or resorting to their area. This was in effect a measure to address the lack of accommodation caused by the Caravan Sites and Control of Development Act 1960. This was the first statutory measure to address the provision of accommodation for Gypsies and Travellers.

It is also notable that a definition was included as to who Gypsies and Travellers should be taken to be:

> *Persons of nomadic habit of life, whatever their race or origin, excluding members of an organised group of travelling showmen or of persons engaged in travelling circuses, travelling together as such.*

Circular 28/77 Gypsy Caravan Sites

Circular 28/77 was issued by the Department of the Environment on 25 March 1977. Its stated purpose was to provide local authorities with guidance on "statutory procedures, alternative forms of gypsy *[sic]* accommodation and practical points about site provision and management". Among other advice, it encouraged local authorities to enable self-help by Gypsies through the adoption of a "sympathetic and flexible approach to [Gypsies'] applications for planning permission and site licences". Making express reference to cases where Gypsies had bought a plot of land and stationed caravans on it only to find that planning permission was not forthcoming, it recommended that in such cases enforcement action was not to be taken until alternative sites were available in the area.

Circular 57/78 Accommodation for Gypsies

Circular 57/78, which was issued on 15 August 1978, stated, inter alia, that "it would be to everyone's advantage if as many gypsies *[sic]* as possible were enabled to find their own accommodation", and thus advised local authorities that "the special need to accommodate gypsies *[sic]* ... should be taken into account as a material consideration in reaching planning decisions".

In addition, approximately £100 million was spent under a scheme by which one hundred percent grants were made available to local authorities to cover the costs of creating 'Gypsy' sites.

[7] Adams, B., Okely, J., Morgan, D. and Smith, D. (1975) Gypsies and Government Policy in England: A Study of the Travellers' Way of Life in Relation to the Policies and Practices of Central and Local Government. London: Heinemann Educational.

Criminal Justice and Public Order Act 1994

The Criminal Justice and Public Order Act 1994 is probably the most significant piece of legislation with regard to Gypsies and Travellers in the last century. This Act has been described as a radical departure from previous policy[8], and James[9] argues that the general acceptance of nomadism was removed from statute. Hawes and Perez provide a useful summary of the key implications for Gypsies and Travellers:

> *The Repeal of part II of the 1968 (Caravans) Act, removing the duty on local authorities to provide sites, and abolishing the government grant for constructing Gypsy Caravan sites...*
>
> *An extended power for local authorities to direct unauthorised campers to leave land, including any land forming part of a highway, any other unoccupied land, or any occupied without the owner's consent. It would become a criminal offence for anyone directed to refuse to leave, or to return to it within three months...*
>
> *An extended power to magistrates courts to make orders authorising local authorities to enter land and remove vehicles and property, if persons are present in contravention of a direction to leave...*
>
> *A strengthening of the powers contained in the Public Order Act 1986 (Section 39), giving police power to direct trespassers to leave if they have damaged the land itself (as distinct from property on it), or if they have six vehicles. It also extends the application of this section to common land, highway verges, byways, green lanes, and other minor highways; and includes new police powers to remove vehicles (1995, p.121).*

[8] Hawes, D. and Perez, B. (1995) The Gypsy and the State the Ethnic Cleansing of British Society. Bristol: SAUS.

[9] James, Z. (2005) Eliminating communities? Exploring the implications of policing methods used to manage New Travellers. International Journal of the Sociology of Law. 33 (3), pp.159-168.

Department of the Environment Circular 1/94 Gypsy sites and planning

Having taken away the duty for local authorities to provide sites, emphasis was now placed on private provision. For the purposes of this research, this is a significant point in the history as it is where local authorities are advised to make provision through the development plan process as a means to compensate for the repeal of the duty to provide sites:

> *4. The proposed repeal of local authorities' duty to provide gypsy [sic] sites is expected to lead to more applications for private gypsy sites. The Government recognises that many gypsies would prefer to find and buy their own sites to develop and manage. More private sites should release pitches on local authority sites for gypsies most in need of public provision.*
>
> *7. At an early stage in the preparation of structure plans, local plans and unitary development plans ("development plans"), it will be important for local planning authorities to be ready to discuss gypsies' accommodation needs with the gypsies themselves, their representative bodies and local support groups....*
>
> ...
>
> *9. After the proposed repeal of this duty, local planning authorities should continue to indicate the regard they have had to meeting gypsies' accommodation needs. Repeal of the statutory duty will make it all the more important that local planning authorities make adequate gypsy site provision in their development plans, through the appropriate use of location and / or criteria based policies.*

The notable thing here, is that there is a tacit acknowledgement that the repeal of the duty may be problematic, and the responsibility is shifted on to the local authorities.

The other relevant point to note is that at paragraph 11, the Circular advised that:

> *...it is essential for authorities to have up-to-date information and to maintain records of trends through regular counts.*

This is arguably the forerunner to the Gypsy and Traveller Accommodation Needs Assessment (see below).

The introduction of a duty to assess the accommodation needs of Gypsies and Travellers (Housing Act 2004)

Section 225 of the Housing Act 2004, included a duty for local housing authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to their area, and then take the strategy into account when exercising their functions.
At subsection (3) it is stated that "Functions" includes functions exercisable otherwise than as a local housing authority which includes for the purposes of planning. The duty to assess need was a key part of the framework of planning Circular 01/06 (see below).

It is also notable that in 2006 by regulations a definition was given for this assessment process that was wider than both the Caravan Sites Act 1868 and that in Circular 01/06 (see below):

> *For the purposes of section 225 of the Housing Act 2004 (duties of local housing authorities: accommodation needs of gypsies and travellers [sic]) "gypsies and travellers" means—*
>
> *(a) persons with a cultural tradition of nomadism or of living in a caravan; and*
>
> *(b) all other persons of a nomadic habit of life, whatever their race or origin, including—*
>
> *(i) such persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently; and*
>
> *(ii) members of an organised group of travelling showpeople or circus people (whether or not travelling together as such).*

This remains the widest definition that has been used in law and policy in England, and was repealed in 2016 (see below).

Ministerial Directions – Planning and Compulsory Purchase Act 2004

The 2004 Act gives the government powers to direct Local Planning Authorities to take certain measures.

Section 27(1) provides:

> *This section applies if the Secretary of State thinks that a local planning authority are failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a development plan document.*

Section 27(2) of the 2004 Act then provides:

> *The Secretary of State may— (a) prepare or revise (as the case may be) the document, or (b) give directions to the authority in relation to the preparation or revision of the document.*

This is a useful tool for the Secretary of State to ensure that local planning authorities make appropriate provision within Development Plan Documents.

It is understood that only a small number of directions with specific regard to Gypsy and Traveller sites have ever been served under this provision. That was to Mid Bedfordshire, Brentwood, South Gloucestershire and Epping Forest all around 2006.

Circular 01/06 Planning for Gypsy and Traveller Caravan sites

This Circular was a significant development in Gypsy and Traveller planning and can be characterised as a more permissive approach with an emphasis on the assessment of need at a regional level (through regional spatial strategies), and the subsequent allocation of suitable land for sites at a local level. Up until the policy was cancelled in 2012, the evidence shows that it was starting to be effective in the provision of sites (Richardson, 2011).

This circular was unequivocal about what local authorities should do with regard to the allocation of land and how they should go about doing it:

> *33.* ***Local authorities must allocate sufficient sites for gypsies and travellers[10] [sic]...***
>
> *...Criteria [based policies] must not be used as an alternative to site allocations in Development Plan Documents where there is an identified need for pitches. Local planning authorities will need to demonstrate that sites are suitable, and that there is a realistic likelihood that specific sites allocated in DPDs will be made available for that purpose. DPDs will need to explain how the land required will be made available for a gypsy and traveller site, and timescales for provision...*
>
> *...35. There are a number of ways in which local authorities can identify specific sites and make land available...*
>
> *a) Local authorities have discretion to dispose of land for less than best consideration where it will help to secure the promotion or improvement of the economic, social or environmental well-being of the area, as set out in ODPM Circular 06/03.*
>
> *b) Authorities should also consider making full use of the registers of unused and under-used land owned by public bodies as an aid to identifying suitable locations. Vacant land or under-used local authority land may be appropri-ate.*
>
> *c) Authorities should also consider whether it might be appropriate to exercise their compulsory purchase powers to acquire an appropriate site.*
>
> *d) Cooperation between neighbouring authorities, possibly involving joint DPDs, can provide more flexibility in identifying sites. Such cooperation is particularly important where an authority has strict planning constraints across its area.*

Circular 01/06 not only required Local Planning Authorities to allocate sites but gave direct suggestions on how to identify and make land available to do so. One of main intentions of Circular 01/06 at para. 12c was to "increase significantly the number of Gypsy and Traveller sites in appropriate locations **with planning permission** in order to address under-provision over the next 3-5 years." *[emphasis added (EA)].*

Also of note was the inclusion of a definition wider than in the Caravan Sites Act 1968 (but not as wide as the Housing Act 2004):

> *15. For the purposes of this Circular "gypsies and travellers" [sic] 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 or permanently**, but excluding members of an organised group of travelling show people or circus people travelling together as such. [EA]*

This was likely to be as a direct result of the Court of Appeal ruling in Wrexham County Borough Council v The National Assembly of Wales and Berry[12] where it was found that an Irish Traveller, who had ceased travelling permanently due to ill health, no longer fell within the definition. This is an issue which will become relevant again in 2015.

The important thing to consider about Circular 01/06, was that after the repeal of the duty to provide sites in 1994, Circular 01/06 was a bold and progressive move to address the issue of Gypsy and Traveller site provision.

[10] A Site Allocation means that the site is allocation for a particular type of development or use, such as housing, employment and leisure, within a development plan.

[11] A criteria based policy is a specific development plan policy which allows a planning applications to be assessed

[12] [2003] EWCA Civ 835

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Gypsy and Traveller Accommodation Needs Assessments Guidance 2007

This document set out detailed guidance on how to carry out Gypsy and Traveller Accommodation Needs Assessments (GTANAs). Its basis was:

> *The assessment of Gypsy and Traveller accommodation needs when carrying out a periodical review of housing needs under section 8 of the Housing Act 1985 is a statutory requirement under section 225 of the Housing Act 2004. Local authorities may also be required, under section 87 of the Local Government Act 2003 (as amended), to produce a strategy that addresses the need identified, including that of Gypsies and Travellers. The assessment and the strategy will need to be informed by a full understanding of their accommodation needs. A Gypsy and Traveller Accommodation Needs Assessment will be required either as part of a Strategic Housing Market Assessment in respect of the local community generally, or separately where a Strategic Housing Market Assessment is not being conducted at that time.*

It's notable that there is a strong statutory basis for undertaking assessments. The guidance was prescriptive in nature, setting out in detail:

- Why the Accommodation Needs Assessment has to be done;
- What it should produce;
- Whom it should survey;
- Key differences between the Gypsy and Traveller community [sic] and others, and the practical implications of these differences;
- How 'accommodation need' for Gypsies and Travellers differs from that for the settled community;
- Timescales for carrying out and updating the assessment.

5. In addition, it provides advice on carrying out the assessment, including:

- Partnership working;
- Deciding who should carry out the assessment;
- The use of existing data sources;
- The use of specialist surveys, including survey techniques and questions;
- How to identify and communicate with the Gypsy and Traveller communities.

Of particular note was that it required GTANAs to delineate what kind of provision was required:

22. It should enable Gypsy and Traveller accommodation need to be quantified in terms of:

- Site accommodation on private sites;
- Site accommodation on socially rented residential sites;
- Site accommodation on transit sites;
- Bricks and mortar housing for owner occupation by Gypsies and Travellers;
- Affordable bricks and mortar housing.

Arguably, this level of detail would mean that GTANAs would be able to better set out the requirements for the Gypsy and Traveller communities.

Finally, it is clear that GTANAs were part of a regional system:

> *11. Regional Planning Bodies and Planning Inspectors will require local authorities to produce Gypsy and Traveller Accommodation Needs Assessment reports which are clearly expressed and provide a robust and credible evidence base. These should demonstrate that the assessment process has been conducted properly and fairly, giving details of the methodology used to ascertain levels of need. This guidance is intended to support that process.*

The regional system gave an extra level of oversight to the production of GTANAs, and could result in the increase in figures (see the examples of Cornwall and East Hampshire).

The guidance was withdrawn on the 9th December 2016 (see below).

Planning Policy for Traveller Sites 2012

Planning Policy for Traveller Sites (PPTS) 2012 effectively represented a watering down of the requirements of Circular 01/06. It also needs to be seen in the context of the end of the Regional planning system which was part of the Localism Act 2011. This introduced 'the duty to co-operate' which it is fair to say was less onerous on local authorities. So, instead of a rigorous assessment with regional oversight, the aims of PPTS 2012 were:

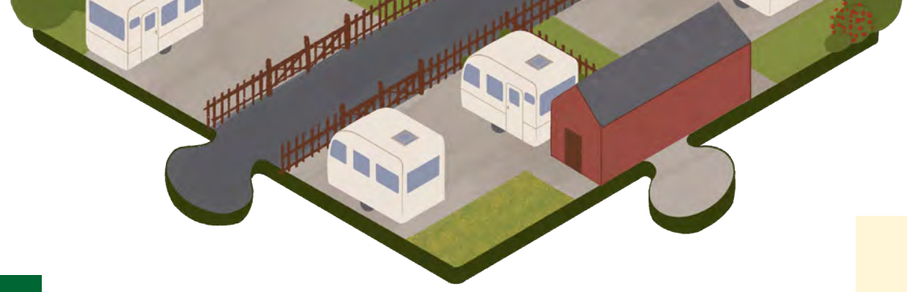
- that local planning authorities should make their own assessment of need for the purposes of planning;
- to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.

These aims were expanded upon within the following paragraphs of PPTS 2012:

Using evidence

Policy A: Using evidence to plan positively and manage development

> *6. In assembling the evidence base necessary to support their planning approach, local planning authorities should:*
>
> *a/ pay particular attention to early and effective community engagement with both settled and traveller [sic] communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)*
>
> *b/ co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to 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.*
>
> *c/ use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*



Plan-making

Policy B: Planning for traveller [sic] sites

7. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the policies in the National Planning Policy Framework, including the presumption in favour of sustainable development and the application of specific policies in the Framework and this planning policy for traveller [sic] sites.

8. Local planning authorities should set pitch targets for gypsies and travellers [sic] and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

9. Local planning authorities should, in producing their Local Plan:

a/ identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.

b/ identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15.

c/ consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries).

d/ relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.

e/ protect local amenity and environment.

[13] Planning Policy for Traveller Sites 2015

[14] https://www.equalityhumanrights.com/en/publication-download/gypsy-and-traveller-sites-revised-planning-definition%E2%80%99s-impact-assessing

10. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers [sic] while respecting the interests of the settled community.

Whilst this is a watered-down version of what came before, it was still unequivocal that need should be assessed and allocations should be made if need is identified. It is also important to note that the definition from Circular 01/06 was imported into PPTS 2012.

Planning Policy for Traveller Sites 2015

PPTS[13] was revised in 2015. Most significantly, the definition was altered to exclude anyone who had ceased travelling on a permanent basis:

*For the purposes of this planning policy "gypsies and travellers" [sic] 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 show people or circus people travelling together as such. [EA]*

The impact of this change in definition, led to a dramatic reduction in the assessed need. A report for the Equalities and Human Rights Commission looking at how the 2015 definition had impacted on 20 different Local Planning Authorities found that:

*Across the 20 Local Planning Authorities the pre-2015 total requirement was for 1,584 further pitches. After the revised definition was introduced, the assessed need fell to just 345. Another way of looking at this is that **instead of 100% of accommodation need coming within the PPTS definition, we have found that since August 2015 this figure is nearer 15% of assessed households.** [EA]*

This definition was addressed in the Lisa Smith v The Secretary of State for Levelling Up judgment (see page 31) and was found to be discriminatory.

Housing and Planning Act 2016

The Housing and Planning Act 2016 removed the final parts of the previous approach in policy and law to Gypsy and Traveller provision. Section 124 revokes section 225 and 226 of the Housing Act 2004, and any secondary legislation and guidance made under them.

Instead, there was a more generalised duty:

> *In the case of a local housing authority in England, the duty under subsection (1) includes a duty to consider the needs of people residing in or resorting to their district with respect to the provision of—*
>
> *(a) sites on which caravans can be stationed, or*
>
> *(b) places on inland waterways where houseboats can be moored.*

What this meant in practice was that there was still a requirement to assess the needs of ethnically defined Romany Gypsies and Irish Travellers who fell outside of the PPTS definition (here on referred to as non-PPTS 2015). The non-effectiveness of this is dealt with in the Equality and Human Rights Commission report referenced above.

[15][2022] EWCA Civ 1391

[16]Appeal Decisions APP/H1515/C/22/3298928, APP/H1515/W/20/3248930

Lisa Smith v The Secretary of State for Levelling Up[15]

As noted above, the decision of the Court of Appeal in October 2022 found that the PPTS 2015 definition was discriminatory. The way the PPTS 2015 definition and the judgment have impacted on decision-making, and theoretically plan-making, is dealt with succinctly in the following extract for an appeal decision letter in Brentwood:[16]

> *33. The definition of a gypsy or traveller [sic] in the PPTS has always been a person of a nomadic lifestyle. This included those who had stopped travelling because of old age, illness or educational needs of themselves or their dependants. In 2015 this definition was amended by introducing the word 'temporarily'. This meant that the many gypsies and travellers who had stopped travelling but couldn't show that cessation as temporary were no longer counted. This led to [GTANA]'s dividing gypsies into two types, 'policy gypsies' who met the definition and whose future need for pitches should be met through the rolling 5-year process and the rest. The Court of Appeal held that the 2015 change was discriminatory. The Secretary of State has accepted this and no challenge to the decision is expected.*
>
> *34. However, as the Council point out, the Court was at pains to explain they were not striking down the definition itself, nor the PPTS. Also, and more recently, the NPPF [National Planning Policy Framework] has been subject to review and a consultation document issued. Neither reference to the definition in PPTS in the consultation document suggests any change is envisaged by the Government. Nor has there been any announcement or WMS [written ministerial statement] about any change to the definition or the way that pitch needs should be calculated. This suggests that no change is being contemplated and PPTS remains government policy.*
>
> *35. Nevertheless, this policy is based on a definition that has been held to be discriminatory. Although that judgement turned on the facts of that case, it is clear from the transcript that the Court of Appeal understood this discrimination would affect a very large proportion of non-policy gypsies [sic]. What this means in practice is that the Council are required to identify a 5 year supply of pitches for gypsies in their area who meet the definition in PPTS and that definition has been found to be discriminatory. At some point in the future that paradox will be resolved either by further government advice or another court case. In the meantime it needs to be considered on a case by case basis.*

36. I was shown two decision letters where it was held the Lisa Smith judgement did not apply because there was no dispute that the appellants were policy gypsies [sic], as is the case here. In the Top Farm case It was argued the appellants were definitely nomadic and the [GTANA] remained a robust analysis of need as it covered all gypsies, regardless of the definition. The Inspector agreed it did not change the situation before [Lisa Smith]. However, the most pertinent facts of that decision were that it was a hearing and there was no dispute about the 5 year supply in the first place. In the Lower Park Farm case, again the appellants were definitely nomadic, but it was agreed the Council did not have a 5 year supply, so whether the need increased or not did not affect that decision. Both Inspectors were able to side-step dealing with the ramifications of Lisa Smith.

37. However, in this appeal the appellant provided 3 decisions where the judgement did have an effect. The first at Hillview in Basildon, the Inspector accepted the Lisa Smith judgement meant the definition could no longer be relied on in a condition limiting the occupants of the site, as it was discriminatory. The second at Horton Road in Staines the Inspector considered the whole need identified by the [GTANA] should be met, one of the reasons being the effect of the judgement. The third was at Mayles Lane in Winchester, the Inspector said the judgement "cast considerable doubt on whether previous needs assessments based on the PPTS definition can be taken as an accurate reflection of need without being tainted by discrimination". This is certainly my view. It is untenable to carry on as if nothing has been changed. The Brentwood [GTANA] may well still be an authoritative source for the numbers of gypsies [sic] in the area and their future needs (although some of its details are disputed by the appellant), but the 5 year supply itself relies on a definition that is "tainted by discrimination".

As can be seen, there is a policy vacuum, as at the time of writing the Government has neither challenged the judgment of the Court of Appeal nor issued a change in policy. As such, different approaches are being taken by planning Inspectors on individual decisions. It is also useful to note that Inspectors in local plan examinations are asking Local Planning Authorities to provide submissions on the impact of the judgment on the need for Gypsy and Traveller pitches. At the time of writing, we are not aware of an Inspector's report regarding a local plan having been issued which deals with the point.

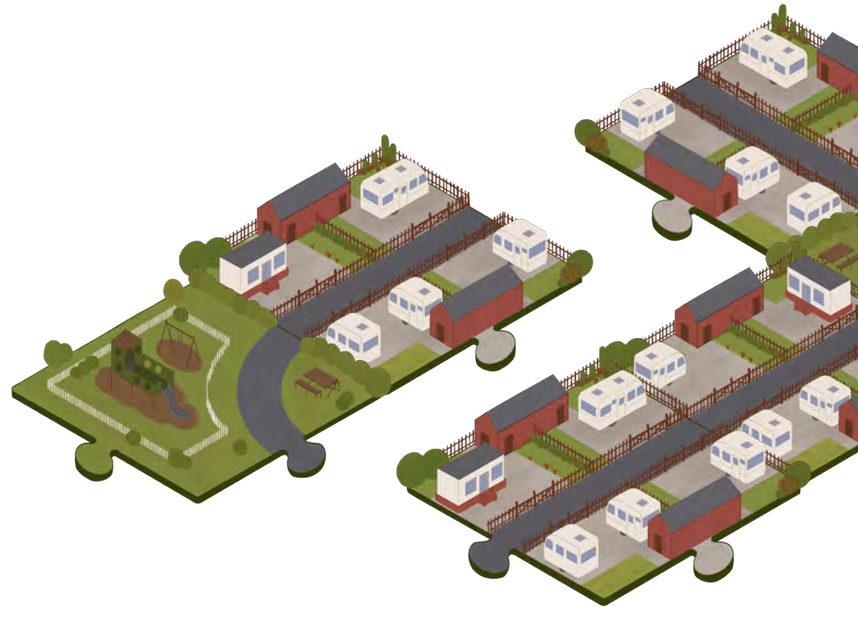
Conclusions on historical policy and legislation

As can be seen, there has been repeated national government law and policy between 1960-1994 which, amongst other matters, has for local authorities:

- Given a power of site provision;
- Given a duty of site provision (and then taken it away again);
- Encouraged a permissive approach to site provision;
- Encouraged an assessment of the accommodation needs of Gypsies and Travellers.

For the purposes of this research the key date is 1994 when Circular 01/94 required local authorities to assess the need for sites and allocate land as part of the development plan process. Whilst the policy and law has changed in the intervening years, this has been the basic premise of national policy with regard to Gypsy and Traveller site provision.

The question that the research therefore asks is: ***how effective have Local Planning Authorities been in making provision?***



PART 2:

HOW EFFECTIVE HAVE LOCAL AUTHORITIES BEEN, SINCE THE REMOVAL OF THE STATUTORY DUTY TO PROVIDE SITES IN 1994, IN MEETING THE ACCOMMODATION NEEDS OF GYPSIES AND TRAVELLERS?

INTRODUCTION AND METHODOLOGY

In this section, we set out the findings of research into how Local Planning Authorities have addressed the law and policy set out above.

This work has been undertaken in two stages:

Stage One: Methodology and research criteria – a study of 100 Local Planning Authorities[17]

There are 333 Local Planning Authorities in England. Of these, 100 have been selected in order to be able to cover almost a third of the country.

There are 9 regions in England, and whilst the number of Local Planning Authorities in each region varies, a reasonable spread across the 9 regions has been attempted.[18] An additional list, as above, of the 100 Local Planning Authorities selected is provided in Appendix 1.

Within each region, a cohort of Local Planning Authorities were selected based on the following criteria:

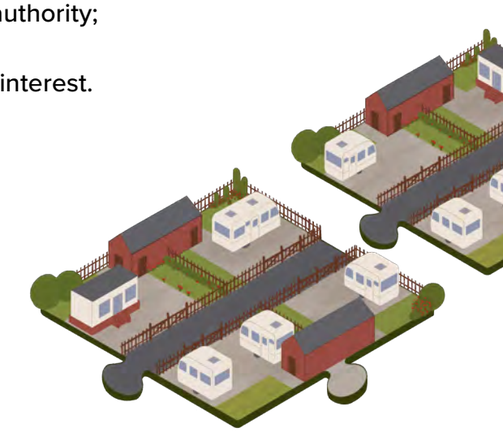
- The population level of Gypsies and Travellers identified in the Census;
- The number of Gypsy and Traveller applications in an area according to government data;
- Professional judgement.

FRIENDS, FAMILIES & TRAVELLERS

A qualitative assessment was made, as it is equally important to consider the situation in areas with smaller Gypsy and Traveller populations. Once the 100 were selected the following pieces of information were obtained through search of Local Planning Authority records or through direct correspondence:

- The date of Gypsy and Traveller Accommodation Needs Assessments;
- Who undertook the Gypsy and Traveller Accommodation Needs Assessment;
- If sites have ever been allocated within a development plan;[19]
- Whether there is an explicit acknowledgement of meeting non-PPTS defined need anywhere within local planning policy;
- Whether there is any public provision;
- When public sites were provided;
- Whether any public sites have been sold off by the local authority;
- A review of recent decisions to see if there is anything of interest.

The results of this assessment are dealt with below.



[17]North West - Blackburn with Darwen, Salford, Wirral, Halton, Hyndburn, Carlisle, Cheshire West and Chester, Warrington, Cheshire east, Rochdale, Lancaster, Manchester, Preston.
North East - County Durham, Darlington, Gateshead, Redcar and Cleveland, Middlesbrough, Stockton-on-Tees, Sunderland, Northumberland.
Yorkshire - Yorkshire and Humber, Leeds, Doncaster, Wakefield, Selby, Hambleton, York, Bradford.
West Midlands - Birmingham, Rugby, Sandwell Metropolitan, Solihull , Walsall, Wolverhampton, South Staffordshire, Wychavon, Shropshire, Coventry, Bromsgrove.
East Midlands - Boston, Newark and Sherwood, North Northamptonshire, Harborough, Rushcliffe, Bassetlaw, Hinckley and Bosworth, Blaby, South Derbyshire, South Holland, West Lindsey, East of England, Basildon, Harlow, Central Bedfordshire, Hertsmere, Brentwood, Epping Forest, Fenland, Huntingdonshire, Peterborough, South Cambridgeshire, Kings Lynn and West Norfolk.
South West - Cornwall, Wiltshire, Tewkesbury, Mid Devon, Teignbridge, Bristol, Bath and North East Somerset, Forest of Dean, Dorset.
South East - Basingstoke and Deane, Epson and Ewell, Reigate and Banstead, Swale, Runnymede, Test Valley, Chiltern, South Bucks, Wycombe, Aylesbury, Chichester, East Hampshire, Waverley, Brighton, London - Bexley, Barking and Dagenham, Southwark, Hounslow, Ealing, Havering, Kingston Upon Thames, Haringey, Lewisham, Islington, Hackney, Enfield, Barnet.

[18]It is important to note that the bulk of the research was carried out before a number of the local authorities were combined with other authorities to form unitary councils in April 2023. The former authorities are still listed within the research.

Stage Two: Research criteria – further research into 15 Local Planning Authorities

From the 100, 15 Local Planning Authorities were selected on the following criteria:

- Best practice in the provision of sites;
- Worst practice in the provision of sites;
- Whether the Local Planning Authority had ever allocated sites;
- Whether the Local Planning Authority had made direct provision;
- Good community engagement;
- Public site provision.

The results for the 15 are set out in separate appendices. Broadly, they set out the following matters:

- A description of the area;
- A history of policy and actions about Gypsies and Travellers in the area having regard to relevant reference documents;
- A review (where appropriate) of relevant appeal decision letters.[20]

The findings are set out throughout the report under the following sections:

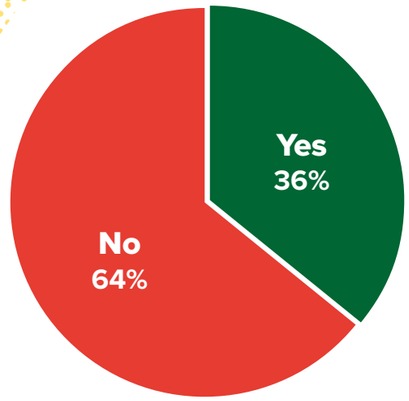
- Overall headline statistical findings;
- Note on the relevance of a 5-year supply of sites;
- Note on the disposal of local authority sites;
- Discussion on themes emerging from the in-depth studies;
- Conclusions and recommendations.

[19]A Site Allocation means that the site is an allocation for a particular type of development or use, such as housing, employment and leisure, within a development plan.

Stage One: Findings of 100 local planning authorities' analysis

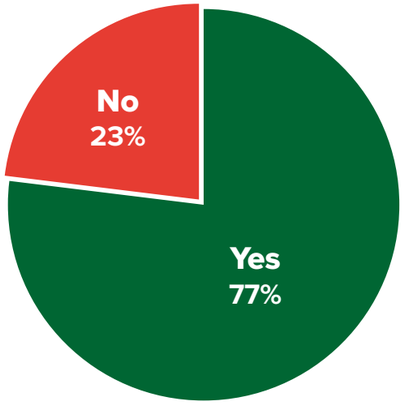
Overall headline statistical findings

Have LPAs ever allocated sites?



Of the 100 Local Planning Authorities where information was available, 64% had failed to allocate sites as part of the development plan process, despite 29 years of government policy and guidance that required this. As will be discussed below, this does beg the question whether the central premise of government policy for Local Planning Authorities to make allocations through the plan-led system, in lieu of the duty to provide sites, can be said to have been effective.

Percentage of LPAs with social provision

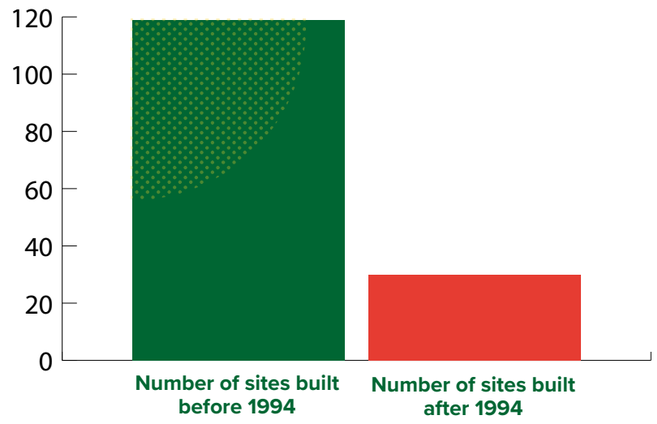


77% of the 100 Local Planning Authorities had social provision, amounting to 149 sites in total.

[20] It should be noted that not every policy document and / or appeal decision letter is referred to. In some cases, there have been 40+ decisions to work through. Instead, those documents referenced have been carefully selected to provide a historical narrative of the situation in each area.

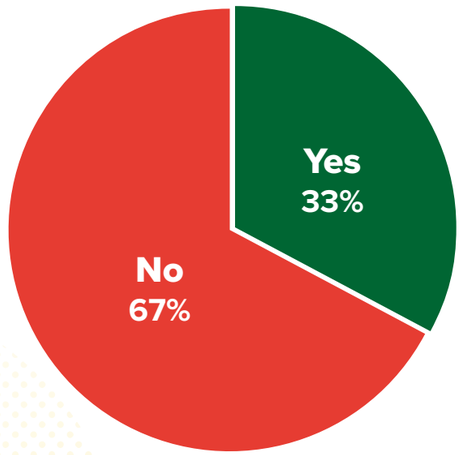
However, of these sites, 119 were built before 1994, and only 30 since:

Numbers of socially provided sites built before and after 1994



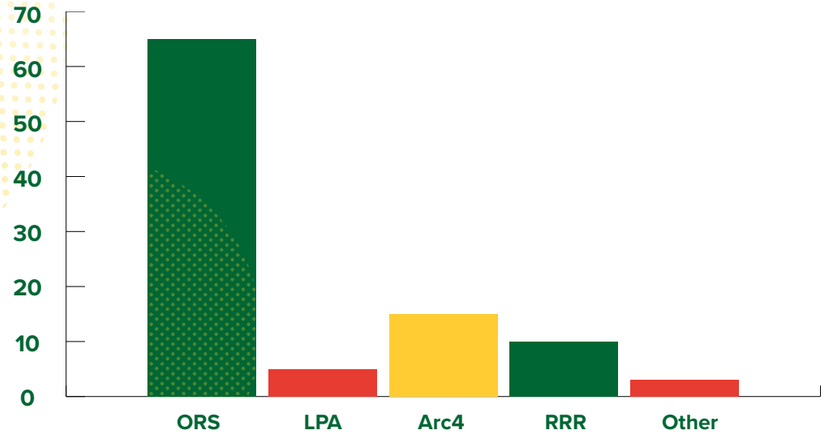
What this demonstrates is that without a statutory duty to provide sites, it becomes a postcode lottery, as to whether a site is built or not in a particular area.

Acknowledging non-PPTS need?



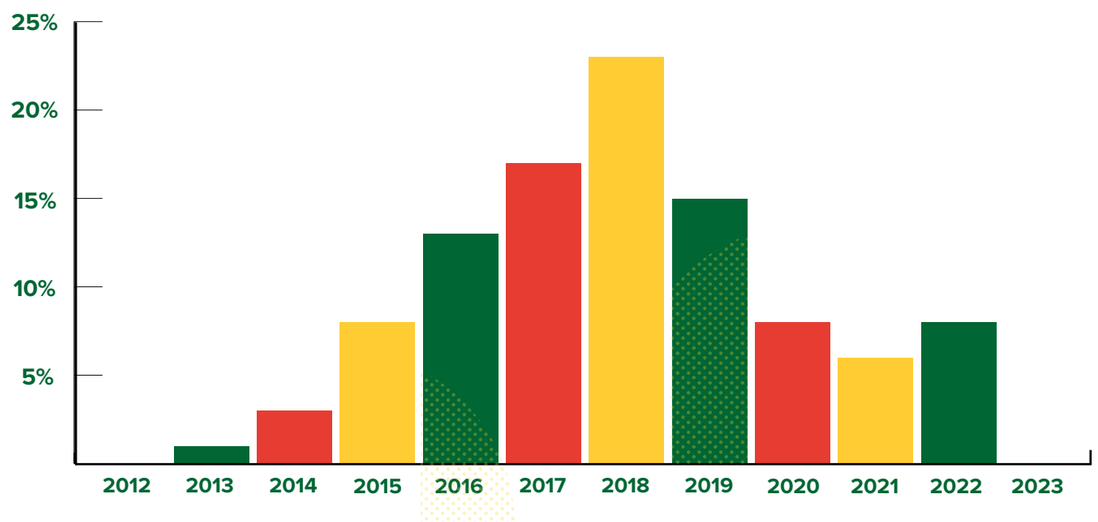
Only 33% of Local Planning Authorities had a strategy, or at least acknowledged the need to meet the needs of those who had fallen out of the PPTS definition. It is of course important to acknowledge that this research was undertaken shortly after the Lisa Smith judgment, and as such it will take Local Planning Authorities time to update polices.

GTANA Author



It is interesting to note that one company had dominated the market for the provision of GTANAs. The difficulty here is that when nationally gathered information is used for the purposes of suggesting average figures, if the approach is not sound then there is a knock-on impact on many other GTANAs. This is an issue that is dealt with in other research[21]. Such issues are also arguably as a consequence of there not being any national guidance on GTANAs to rely upon.

GTANA Publication Year %



This graph shows that the vast majority of GTANAs are over 5 years old. Whilst there is no national guidance on how often assessments should be renewed, it is questionable as to how up to date those studies are.

[21] equalityhumanrights.com/sites/default/files/gypsy_and_traveller_sites_impact_of_the_revised_definition.docx

Note on the relevance of a 5-year supply of sites

Research has been carried out previously on whether Local Planning Authorities are able to prove a 5-year supply of Gypsy and Traveller sites[22], which is a requirement of PPTS.

However, for the purposes of this research, this issue has not been addressed. The reason is that even where a local planning authority purports to have a 5-year supply of sites, this is not necessarily indicative of any proactive efforts that have been made to identify sites. It can simply be because there have been sufficient sites granted planning permission (often at appeal). As such, allocations do not need to have been made in order to have a 5-year supply. The area profiles on Swale and Wychavon are examples of this.

Note on the disposal of local authority sites

Within the sample of 100, based on available evidence, we found examples of where local authorities have either sold former local authority sites or have considered doing so. The details regarding the sale of these sites are often opaque, and in some instances, it was difficult to find out how someone might apply for a pitch. It was also unclear who was responsible for the management of the sites. In some cases, the ownership was unclear.

The disposal of council sites is a matter of significant concern and should be the subject of further research.

[22] https://www.gypsy-traveller.org/wp-content/uploads/2020/02/Research-on-the-five-year-supply-of-deliverable-Gypsy-and-Traveller-sites-in-the-South-East-of-England.pdf

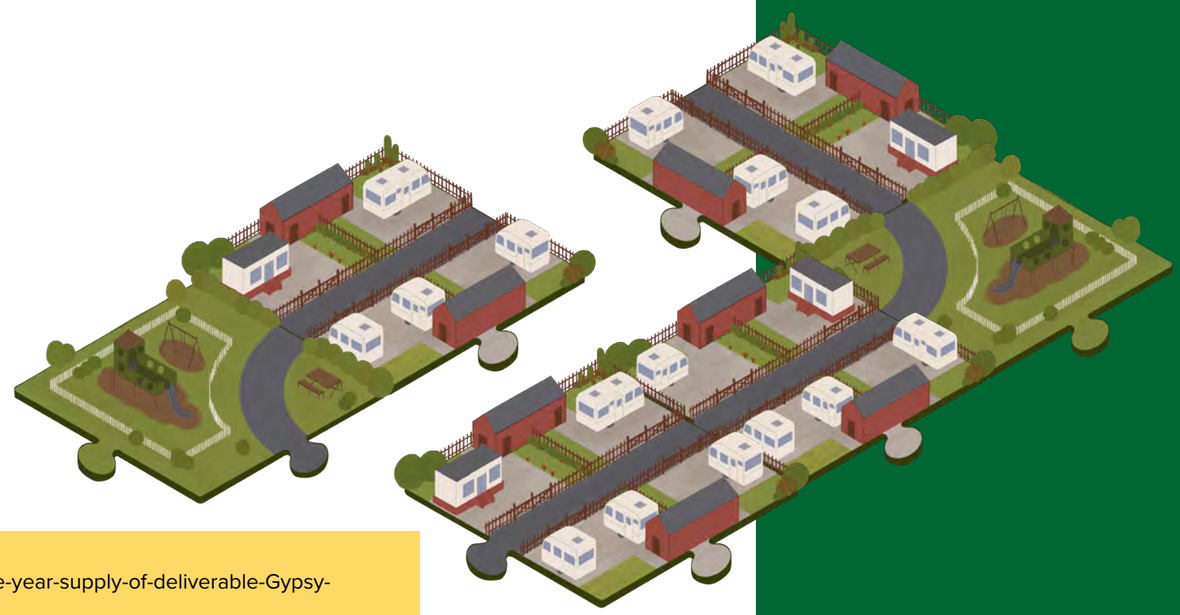
FRIENDS, FAMILIES & TRAVELLERS

Stage Two: Discussion on themes emerging from the 15 area profiles

We will now work through a number of themes that have emerged from the area profiles of Basildon, Brighton, Bristol, Carlisle, Cheshire West and Chester, Cornwall, East Hampshire, Leeds, Manchester, Preston, Runneymede, Southwark, Swale, Wirral, Wychavon.

These are broadly split into the following headings:

1. *Measuring the need;*
2. *Meeting the need (or not);*
3. *The Green Belt;*
4. *Other matters;*
5. *Good practice (actual and potential).*



1.
MEASURING THE NEED

Meeting the need on paper, does not mean there are sites that are available to purchase or rent

As commented on earlier in this report, it is quite often the case that even though there may be a 5-year supply (or near to) on paper, there are still a lack of alternative sites (see Wychavon and East Hampshire). In Swale, planning appeal Inspectors have repeatedly found that, despite there being a 5-year supply, there was still unmet need for sites:

> *12. The balance of evidence in this appeal is that the Council is making progress towards making provision for its assessed need for additional pitches. On the other hand, the Council has not suggested any specific alternative site which is likely to be available to the members of this extended family if they are required to leave the appeal site on the expiry of a 6 month compliance period.*

As such, the presence or otherwise, of a 5-year supply is a poor indication of whether or not a Local Planning Authority is meeting its need.

Taking into account the needs of those in bricks and mortar

The approach to the needs of Gypsies and Travellers in bricks and mortar were problematic within some of the area studies. In the 2018 Swale GTANA, stakeholder consultation set out a harrowing picture for Gypsies and Travellers in social bricks and mortar housing. The GTANA estimated on census data of some 149 households in the area, yet not one of them was interviewed. Instead, an average figure from other GTANAs was used to come up with a figure of 8 pitches.

In Manchester, in 2007/2008 the GTANA gave a figure of 44 pitches being required for those in bricks and mortar and made a claim that the GTANA was:

> *"one of the most statistically robust GYPSY AND TRAVELLER surveys undertaken to date"*

In subsequent GTANAs no need from bricks and mortar was identified despite the census data on Gypsies and Travellers in housing being noted.

GTANAs need to include the needs of Gypsy and Traveller people within bricks and mortar in order to give a full picture of the actual need for pitches.

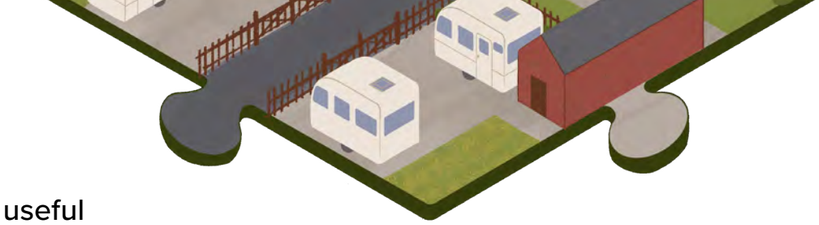
The use of turnover to assume that need will be met

In Preston, the research company undertaking the GTANA concluded in 2019 that 3 pitches becoming available on a public site with very low turnover would mean that it could be expected that 26 pitches would become available until 2035, which would largely meet the need for pitches in the district.

In Carlisle, in 2013, the same company suggested that 40 pitches would become available over the course of five years. This was accepted by the Local Plan Inspector on the basis that ongoing monitoring would occur. It is evident from an appeal decision letter that this has not occurred.

This approach is one that has been used in many other GTANAs over the course of several years. It is fundamentally flawed for the following reasons:

- It fails to account for where those moving off a public site will move to;
- It fails to consider that not every Gypsy and Traveller may wish or be eligible to live on a public site;
- It fails to consider the reasons why people may move away;
- It relies on Local Planning Authorities reviewing their need figures which is not always possible.



The unfinished panel report on the South East Regional Strategy provides a useful commentary on this issue:

*One of the key issues, and the possible source of misapplied assumptions in several [GTANAs], and by several local authorities, is the difference between **turnover** i.e. the change in tenant or occupier and **net vacancy** i.e. turnover which leads to a net gain in the overall supply of pitches as the previous occupier no longer has a need for such accommodation. Most turnover is likely to be just that and will not result in a net vacancy. To be counted as a source of supply a net vacancy must be assured and quantifiable, certainly if it is to be used as the basis of an assumed continuing source of supply...*

...In most cases turnover is likely to represent people moving from one pitch to another, whether on the same site or another and no 'net vacancy' arises. E.g. at its simplest level if two families on the same site were to swap pitches, this would represent a turnover of 2 but no net vacancy. A net gain in supply can only arise from a genuine vacancy. We examine each of the three bullet point categories set out from CLG [Communities and Local Government] Guidance above as to what extent they can be regarded as representing a genuine vacancy and a net source of supply at the local or regional level.

A household who moves from an authorised site into housing would create such a vacancy (provided they stay in such accommodation) but none of the [GTANAs] provide any evidence to underpin the rate at which, or indeed whether, this does occurs in that [GTANA] area and in what numbers. An expressed desire or intention to move to housing, used by several [GTANAs] as the basis of an assumed continuing source supply over several years, is a very different matter. Such moves may or may not occur for a variety of reasons, both personal and site-related. Even if they did occur the timing is uncertain and the individual circumstances of one family cannot be assumed to be replicated by other families on other sites over several years. We regard this approach, mainly used by DCA to generate an on-going source of supply, to be fundamentally unsound.

Such moves undoubtedly do occur but there is no evidence to suggest that they are more than minimal in number or that they constitute an assured source of continuing supply of any reliable figure in any [GTANA] area.

Pitches may be vacated by people moving out of the study area, although again there is no evidence to indicate whether and to what extent this does occur. But unless that household moves out of the South East Region a vacancy in one [GTANA] area will create a need for a pitch in the receiving area. None of the [GTANAs] made any allowance for gypsies and travellers [sic] moving in from other areas, so to assume a net vacancy as a result of such a move in the absence of provision being made by the receiving authority is unsound. Again, such moves may well occur, but without the evidence that it represents a net vacancy at Regional or sub-Regional level it cannot be regarded as a net source of supply.

The death of a sole occupier is the only certain source of net supply, but the frequency of this occurring depends on personal factors, and the number of such instances is likely to be small...These cannot be predicted in terms of their timing and location and cannot be used as an assured source of supply in any [GTANA] area.

Thus in conclusion we see no evidential justification for assuming any source of pitch supply from turnover or net vacancies or expressed intentions to move into housing or elsewhere.

WE RECOMMEND THAT NO SUCH ASSUMPTIONS OF SUPPLY FROM TURNOVER OR ASSUMED VACANCY RATES BE ACCEPTED AND THAT ANY SUCH ASSUMPTIONS WHICH HAVE BEEN MADE SHOULD BE DISCOUNTED

2.
MEETING THE NEED (OR NOT)

Reliance on private provision to meet the need

In Wychavon, it is evident that there is a long history of planning permission being granted for private sites. There is also a long history of social provision being substantially oversubscribed. The Local Planning Authority in this case has chosen to continue to rely on private provision to meet the need on paper, but this ignores one of the aims of PPTS which recognises *that there will always be those Travellers who cannot provide their own sites.*

In Swale, one site which was/is allegedly occupied by non-Gypsies and Travellers was taken into account as meeting need, meaning that the Local Planning Authority could prove in excess of a 5-year supply.

An Inspector in Swale found quite reasonably that:

> *19. However, it is clear to me from the information provided at the hearing that, although the Cricket Meadow and Orchard Park sites have permissions that are not personal and could be available to any gypsy or traveller [sic], they provide additional caravans on existing pitches for existing families rather than new, separate pitches for new families. Therefore they cannot count fully towards supply.*

There have also not been any public sites approved in Swale since 1990. This area has the 4th largest Gypsy and Traveller population in the 2011 census. It would follow that a proportion of this need would need to be met through public provision.

Ensuring that allocated sites are actually developed

In Carlisle, a site that was allocated in 2016 has still not been developed. The same is also true in Wychavon on a strategic allocation. Local Planning Authorities need to put in place legal agreements to ensure delivery when they are relying on allocations to meet the need.

Objections to allocations

Gypsy and Traveller site allocations are often the subject of public objections. The example of Bristol is useful in demonstrating how a Local Planning Authority will attempt to make allocations but the response from local communities is very problematic and may result in the allocations falling away before adoption.

Plans being allowed to be adopted on the basis of commitments being made to allocate sites

Plans are often allowed to proceed on the basis of assurances to meet need.

In the case of Bristol, a site allocations plan as *part of* housing provision was allowed to proceed **without** the Gypsy and Traveller site allocations on the basis of a commitment in the local development scheme to progress with a site allocations document. This commitment was never fulfilled.

Likewise in Southwark, the examining Inspectors would not hold the plan up and excepted future commitments to consider the need.

The same is true in Swale in 2008.

In Preston, commitments in the 2015 Local Plan to produce a joint Development Plan Document (DPD) with neighbouring authorities appears not to have progressed.

In Brighton, examining Inspector stated:

> *43. It is less than ideal that the City Plan Part One does not fully comply with the Framework and PPTS, notably the requirements to set pitch targets and identify a five year supply of deliverable sites and sites or broad locations in later years of the Plan period, However, the Council has provided evidence of work undertaken with the aim of identifying a site or sites to meet the need to 2019[17], which provides a degree of confidence that the Council intends to address this issue in Part Two of the Plan. In all the circumstances, I consider that this issue is likely to be resolved more quickly through the adoption of the City Plan Part One which will enable the Council to move forward with Part Two of the Plan and, if necessary, an early review of Policy CP22.*

The needs were not addressed in the subsequent plan.

In Cheshire West and Chester, commitments made in the 2015 plan did not happen. What this shows is that it is too easy for Local Planning Authorities to 'kick the can down the road' and defer allocations to a later date. Examining Inspectors, presumably not wishing to hold plans up are all too ready to allow this to happen.

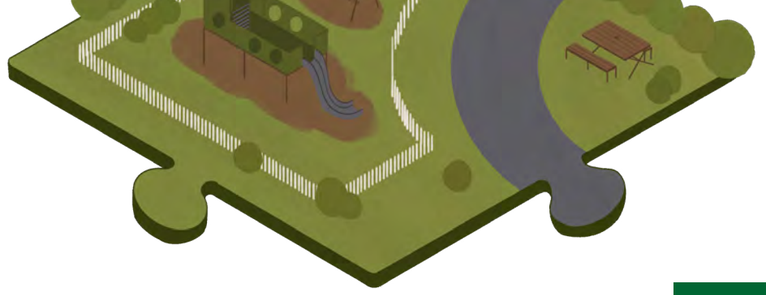
The consequences of inaction

In Cornwall, despite an abject failure to meet the need either through the local plan process or with individual planning applications, there have been no consequences other than substantial weight being afforded in individual planning appeals. Other than the obvious benefits for the families concerned and a small reduction in the need figure, this has no overall benefit for the Gypsy and Traveller population.

In the Wirral, despite the Local Planning Authority having a small, identified need since 2008, it would appear that no substantive efforts have been made to identify sites and there appear to have been no real consequences of the failure of the Local Planning Authority to meet this need.

Gypsy and Traveller needs not being met due to other unrelated issues

In Basildon and East Hampshire, Local Plans have been withdrawn or delayed due to unrelated issues to do with national policy on housing provision. This means that the proposed site allocations have either been lost or seriously delayed.



3. GREEN BELT

The constraint of the Green Belt

The evidence within the report does demonstrate that the Green Belt is a significant barrier to the provision of Gypsy and Traveller sites (see Basildon, Cheshire West & Chester, Wychavon, Leeds and Runnymede).

In Basildon a Planning Inspector found that:

> *The Council argued that there was a disproportionately great concentration of gypsies [sic] in the Basildon area, and that demand for pitches should not be assumed to be the same as need for them. They considered that the existing concentration of gypsies and demand for sites in Basildon was driven by the availability of cheap otherwise non viable land associated with the inter-war subdivision of farmland into plotlands in the countryside Green Belt around the town[23].*

Such land is likely to be highly suitable for use by Gypsies and Travellers, yet the Green Belt is a bar to this occurring. In the other areas, there are multiple appeal decisions which illustrate vividly the process that Gypsies and Travellers have to go through to obtain planning permission in the Green Belt. Whilst we have not included extracts with personal details, in most cases families have had to demonstrate that their personal circumstances (amongst other matters) are sufficient to clearly outweigh to the harm to the Green Belt, thus demonstrating very special circumstances. This almost always involves having to discuss confidential information with regard to health or children in the public setting of an appeal.

The consequences of failing to allocate sites in areas constrained by Green Belt

There were two notable consequences of failing to meet the need in the Green Belt. The first is the prevalence of temporary permissions, and the implications of this on families. Within the Wychavon area profile, a planning inspector articulates this issue well:

> *22. In this case, a series of permissions over 12 years has been granted in the **clear expectation that the Council would allocate sufficient suitable sites within the period of the permission,** to enable the appellants to find an alternative home. This has failed to happen on each occasion.*
>
> *23. Consequently, the appellants have experienced an extended [period] of uncertainty surrounding their home. To my mind, to be in this situation for this length of time places an unreasonable burden on the appellants as well as requiring applications for renewal on a cyclical basis.*

It is common for sites within the Green Belt to be given successive temporary permissions before finally being given permanent permission years later.

The second consequence can be found in Basildon, where the failure to meet the need in the Green Belt led to the eviction of the Dale Farm site. A considerable number of people were made homeless (with the associated implications for health and education), there was huge cost to the public purse and the site was left in a derelict state for many years.

[23] APP/V1505/C/05/2003501, 2003502, 2003503, 2003499

4.
OTHER MATTERS

The question of van dwellers

In Bristol and Brighton, there have been and are still significant proportions of people living in vehicles who are taken not to meet the PPTS definition. Whilst the reasons people take to living in vehicles are complex and not uniform, it still presents issues for councils which are in some respects similar to those that do fall within the PPTS definition.

In Bristol, for example, the approach has been taken to attempt to accommodate a proportion of this population, and some positive messaging has been made by the council. In Brighton, the opposite is true, and it appears that no proactive measures have been taken to support vehicle dwellers.

Occupation of sites by non-Gypsies and Travellers

In Swale and Runnymede, 3 large-scale sites were reportedly occupied by non-Gypsies and Travellers. The research found no evidence of this reported elsewhere. It is notable that these were large-scale privately-owned sites, and it is not anticipated that this pattern would be repeated on small-scale sites.

This issue is indicative of the wider crisis in the provision of social housing which leaves people seeking whatever accommodation is available. It does however present issues for the supply of sites and can skew the need figures for an area.

5.
GOOD PRACTICE (ACTUAL OR POTENTIAL)

Giving the community ownership

In Preston, the Local Planning Authority took the step of purchasing an existing site from the county council. This allowed for the residents to form a co-operative to manage the site themselves. Whilst this is not a planning decision and therefore not strictly within the ambit of this research, it is an important example of good practice that should be highlighted.

Negotiated stopping

It is important to consider that it may not always be necessary for solutions to Gypsy and Traveller accommodation needs to be found within the planning system.

In Leeds and Bristol, sites have been established without planning permission on unused public land to address an immediate and pressing need.

Furthermore, the example of Negotiated Stopping in Leeds, which has now been used elsewhere in the country, is one such example. The site allocations plan makes no specific allocations for negotiated stopping sites for reasons set out in the examining Inspectors' report:

> *62. The Council has deliberately chosen not to identify any specific site(s) to accommodate 9 stopping places due to concerns that they are likely to become, by default, sites for permanent accommodation. Rather, the Council intends that the Environment and Neighbourhoods service will work alongside other Council services, as part of ongoing operational management, to identify an appropriate pool of short-term sites where gypsy and travellers [sic] passing through Leeds can be directed...*

> *This approach has the support of Leeds Gypsy and Traveller Exchange (GATE), the local gypsy and traveller advocacy group. This is a pragmatic approach allowing the Council to exercise flexibility in the sites it uses although it will not strictly fulfil the requirement to identify in the SAP where stopping places will be. The Council will need to monitor closely whether it can deliver and manage a constantly changing pool of available stopping places (9 pitches) and if not, consider reviewing the SAP...*

This is a pragmatic and sensible approach. However, it also needs to be considered that not all local authorities will take this approach and it would only be through a national statute and/or policy that this approach would be taken consistently across England.

The need to mainstream and normalise the provision of Gypsy and Traveller accommodation

The Basildon case study highlights an attitude from the Local Planning Authority during the 2000s that there was something inherently unfair about the majority of Gypsies and Travellers being found within their area. One such comment includes:

> *...the Council is seeking a "fairer" distribution throughout the County and the region as it argues that there is currently a disproportionate number of gypsies and travellers [sic] in the District compared to other districts.*

This is not an uncommon approach to come across, particularly from elected members (it is however uncommon for planning officers to be making such a comment). The obvious point is that if the words 'Gypsies and Travellers' were removed and the name of any other minority group was inserted, it is probable that such a comment would not be made nor included in a statutory document such as an appeal decision letter. What this shows is the fact that Gypsy and Traveller site provision is seen as being inherently problematic, and more so than mainstream housing provision (which is of course difficult for many Local Planning Authorities).

The importance of strong national policy and law

Whilst not good practice, the failure to meet the needs of 'non-PPTS 2015 Gypsies and Travellers' is useful in demonstrating what happens when there is a lack of strong policy and law. The example of Southwark is useful in showing how the Housing Act 2016 duty does not necessarily translate in provision being made. This is also true in other areas such as Cheshire West and Chester, Brighton and Wirral, where there were no plans to meet non-PPTS need, and in Runnymede where turnover on mobile home parks was said to be able to meet the need. The same is true in Swale, where in 2017 the examining Inspector explicitly allowed a plan to proceed without any need being addressed for non-PPTS need in the absence of any government policy.

Without strong national policy to allocate sites, Local Planning Authorities have no real impetus to meet the need. The PPTS 2015 definition is prime evidence of this as the needs of a considerable number of Gypsies and Travellers fell away.

The importance of community groups

In Bristol, there are a number of active groups who have sought to engage with the council on behalf of Gypsies and Travellers and van dwellers. They are listed within the council documents and it is evident that their views have been taken on board.

In Southwark, the opposite is true, despite clear attempts to engage with the GTANA, the representative groups were not content with the outcome.

In Leeds, the member organisation Leeds Gypsy and Traveller Exchange (GATE) has been at the heart of the plan-making process for Gypsies and Travellers.

Leeds GATE played a lead role on the steering group for the work:

- Leeds GATE worked with Council officers in preparing an agreed methodology for the local assessment including ways to identify and engage previously concealed need;
- Leeds GATE's involvement led to meaningful engagement with the Gypsy and Traveller communities, including those who were previously reluctant to interact with the Council, which helped improve the range of the survey;
- Council has provided Leeds GATE with funding to cover the costs of their time and that of community enumerators in carrying out the survey;
- Leeds GATE supervised and conducted the survey themselves in collaboration with community enumerators from the local Gypsy and Traveller communities, completing 115 surveys.

It is notable that the costs of the members' organisation were covered in this situation. Moving on from the assessment of need, it is also clear that Leeds GATE were fully involved in site allocations process, working in partnership with the Local Planning Authority. PPTS states that Local Planning Authorities should:

> *a) pay particular attention to early and effective community engagement with both settled and traveller [sic] communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups);*
>
> *b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to 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.*

It is evident that Leeds was effective in meeting these requirements.

The importance of council resources

In East Hampshire and Leeds, significant time and resource has been put into ensuring that the Gypsy and Traveller communities are consulted. In Bristol and Leeds, it is clear that significant council resources of both officer time, finance and land have been put into providing accommodation on meanwhile sites and the development of a new site. Furthermore, in Leeds, it is clear that significant resource has been put into the site allocations process, which even involved a visit to a horse fair by council officers.

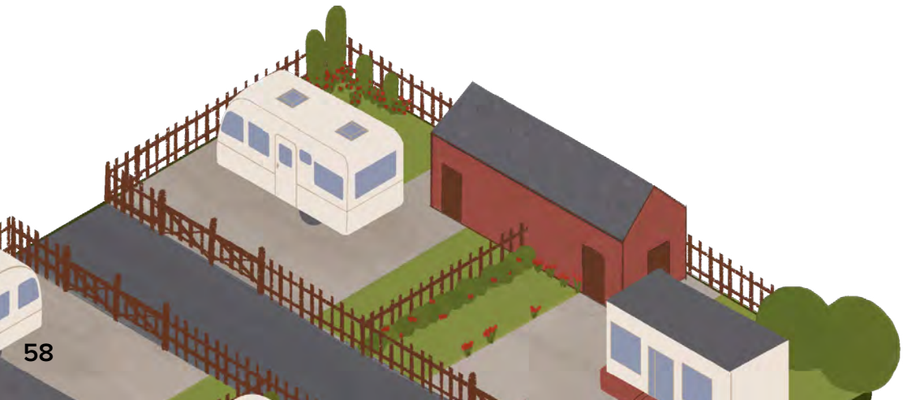
Direct provision

In Leeds, Bristol, Brighton, Cheshire West and Chester, provision has been made without taking potential sites through a local plan allocation process. This is a sensible and pragmatic approach to the provision of sites that has been shown to deliver.

The importance of political leadership

In Bristol, the comments of Mayor Marvin Rees have shown that positive political leadership on this issue helps rather than hinders. Likewise, in Preston, it would appear that there has been political leadership in the acquisition of the Leighton Street site and the facilitation of co-operative ownership.

In Leeds, it was an elected member who called for an inquiry into site provision in 2010. Since then, there has been partnership working with the local Gypsy and Traveller organisation (including a needs assessment), site allocations and the direct provision of a site.



The importance of representation at local plans

In Cornwall and Leeds, the input of Gypsy and Traveller representatives, as part of the respective Local Plans, led to better outcomes for need figures in both areas, and allocations in Leeds. However, in Southwark, despite good quality submissions by the local Gypsy and Traveller organisation STAG to the local plan, no allocations were made – for complex reasons explored in the area profile (see appendix 12).

In Swale, the 2008 Local Plan Inspector noted that there were no objections to the Local Planning Authorities' approach of not making allocations and allowed the plan to procced on that basis.

Given the number of Local Planning Authorities to cover, it is not possible for Gypsy and Traveller organisations to engage with local plan processes in multiple areas. Furthermore, it is unusual for Gypsies and Travellers to instruct planning consultants to appear on their behalf at plan examinations. As such, many local plans procced without the input of Gypsy and Traveller communities and their representatives.

Working on a regional level

As is set out in Part One, Regional Planning Bodies used to have oversight of Gypsy and Traveller provision. As can be seen in the cases of Cheshire West and Chester, Runnymede, Cornwall and East Hampshire, the accommodation need figure was increased following a benchmarking process, as part of the regional plan. This additional oversight, beyond examination of local plans, ensured that the figures were accurate.

The need to work on a regional basis is also highlighted in the case of Southwark where provision wasn't made. Instead, a commitment was made in the local plan:

> *We will work with the Mayor of London on the London-wide assessment for the accommodation needs of Gypsies and Travellers to work towards meeting the needs of the Gypsy and Traveller community [sic] in London. This work will help to inform future policies in Southwark where necessary.*

In Basildon, it is evident that the Local Planning Authority objected during the course of planning appeals to the figures that were being arrived at, on a regional basis. Given that this is a Local Planning Authority with a long history of inaction, it would seem like the imposition of regional targets might have been a useful tool for ensuring that provision was made.

With further regard to Basildon, it is also fair to note that in areas that are significantly constrained by the Green Belt or other factors, there is a reasonable case to be made for neighbouring authorities meeting the need. This was what happened in the East of England Regional Spatial Strategy. In 2012, the regional strategy was revoked and replaced by the lighter touch duty to co-operate. The impact of this was that need in Basildon remained high.

The area profile of Manchester sets out how GTANAs have repeatedly not taken into account the needs of Gypsies and Travellers in bricks and mortar housing, and have misrepresented the situation on what was the only public site at Dantzic Street. This has led to the need figure being in minus figures. As the City Region Plan is leaving the matter of Gypsy and Traveller site provision to individual authorities, there has been no regional oversight of the need figures.

There are significant advantages of regional oversight of Gypsy and Traveller site provision, not least the benchmarking of GTANAs. When considering the East of England and South East plans, it was also evident that community organisations had a significant amount of involvement in the examinations which ensured that there was community input.

The use of Ministerial Directions

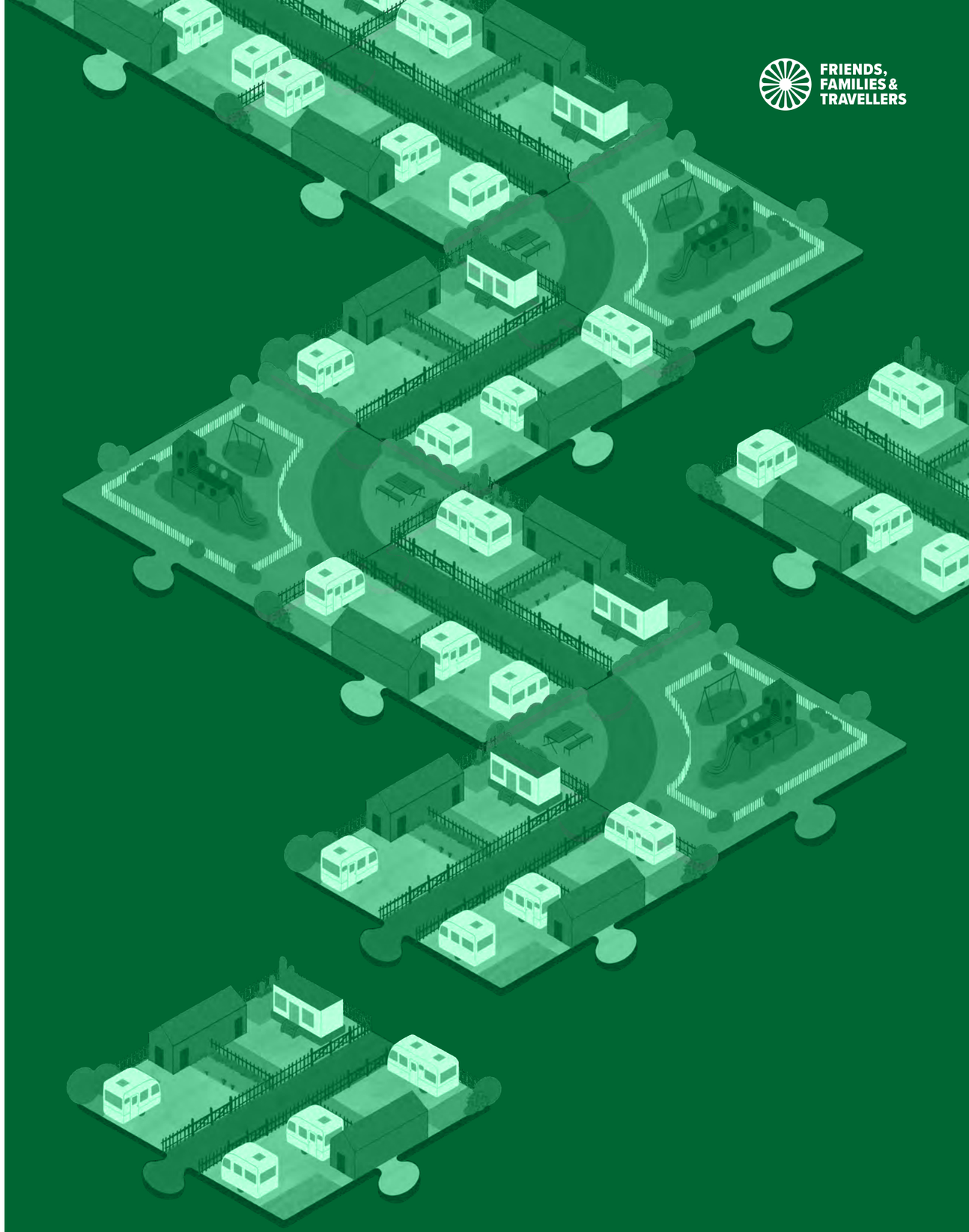
As can be seen in the case of the Wirral, a ministerial direction is an effective tool for national government to ensure that a council fulfils its planning functions.

National oversight of Gypsy and Traveller site provision could ensure that pitches are actually provided.

The need to acknowledge public site provision

In Cheshire West and Chester, the 2007 GTANA, indicated that local authority ownership was the preferred option and gave some suggestions on specific design matters and location. The Local Planning Authority then provided some 30 pitches over two sites which on the face of it have met the need for public pitches.

In Leeds, the GTANA made an active distinction between private and public accommodation needs, and this was reflected in the site allocations.



PART 3:

RECOMMENDATIONS

Given all the above, the question is now, "what would an effective planning system for Gypsies and Travellers look like?" Before looking at this, it is worth asking whether the post-1994 system for site provision has been a success. There is no clear answer to this. For those wishing to develop sites in areas such as Swale or Wychavon, there have been no clear private sites developed. However, when looking at areas with a greater level of constraint (namely the Green Belt) such as Basildon or Runnymede, there has been slow progress in private sites coming forward.

However, when it comes to the provision of public sites, the results set out above record that out of 100 local authorities, 80% of socially provided sites were built before 1994.

Between 1968-1994 the duty to provide sites combined with a 100% grant to fund their development ensured that sites were developed. In the period from 1994 to the present date, the development of sites was dependent on Local Planning Authorities taking a proactive approach to provision. Given that we know that a higher proportion of Gypsies and Travellers live in socially provided accommodation, compared to the general population, this means that a significant proportion of the communities are at a disadvantage compared to the pre-1994 position.

1. Primary recommendation – the reintroduction of the duty

Given this, the primary recommendation of this research is to introduce a statutory duty to provide sites. Such a duty exists in Wales. Such a duty should also exist alongside proper funding measures. With a reasonable approach, to both location and funding, this could be the single biggest transformative measure for Gypsies and Travellers in England.

Alongside this, this report makes a number of other recommendations:

FRIENDS, FAMILIES & TRAVELLERS

2. Restoration of the PPTS 2012 definition

As has been noted earlier, there is a current policy vacuum with regard to the definition following the Lisa Smith v The Secretary of State for Levelling Up judgment from the Court of Appeal. The PPTS 2012 definition should be restored.

3. Guidance on Gypsy and Traveller Accommodation Needs Assessments

Following the withdrawal of the 2007 Guidance, there has been another vacuum for the assessment of need. This has allowed those private companies who provide most of the GTANAs in England to develop their own methodologies, criticism of which can be found within this report. New guidance should be issued to ensure that GTANAs meet the same standards across the country. Further to this, the guidance should cover the following specific points amongst other relevant matters:

- No turnover to be included;
- Ensure that the needs of Gypsies and Travellers in bricks and mortar are covered;
- Ensuring that assessments make a distinction between the need for public and private pitches in the same way that general housing is divided between market and affordable;
- An oversight group for each GTANA with adequate (paid) representation from the local Gypsy and Traveller communities or advocacy organisation.

4. The 5-year supply

The 5-year supply of sites figure should be set for publicly owned sites by local authorities only, as it is a poor indicator of pitches being available for occupation. Private provision should be measured against the general need figure.

[24] The Housing (Wales) Act 2014 ("the Housing Act") places a duty on local authorities to assess the need for the provision of sites for mobile homes in their area, and where that need is identified, a local authority must exercise its powers under the Mobile Homes (Wales) Act 2013 ("the Mobile Homes Act") to provide those sites.

5. Regional oversight

A number of the area profiles demonstrated that the benchmarking process of GTANAs undertaken as part of regional strategies was successful in ensuring that the level of need was robust. Furthermore, in areas of significant constraint, need was able to be met in neighbouring boroughs. In contrast, in Manchester, the Greater Manchester Region Plan leaves the allocation of Gypsy and Traveller sites and oversight of the GTANA to the individual authorities that comprise Greater Manchester. This is an approach that thus far has failed to address unmet need in the City of Manchester.

We would recommend that in locations with regional government that have planning functions, oversight of Gypsy and Traveller provision should be a responsibility on a strategic level.

6. Consultation with the communities

Local planning authorities should seek to engage with local Gypsy and Traveller organisations as much as is possible. A list can be found here:

https://www.gypsy-traveller.org/services-directory/

Furthermore, this Friends, Families and Travellers report has been made possible through the support of Oak Foundation, to look at some of the issues related to the social provision of Gypsy and Traveller accommodation needs. One of the strands in the Oak Project[25] being developed in the year 2023/24 is the 'Roots Group', working alongside a cohort of local grassroots groups. This project will identify the barriers groups have in addressing planning and act on some of the practical issues such as building a network, delivering training around knowledge and skills gaps. Case studies, Good Practice toolkits and other resources will also be produced. Learning by stakeholders of the barriers communities have in engaging in planning policy and processes can inform how to more effectively reach out to ensure community voices are better listened o.

7. Direct provision of sites

Where there is an identified need for public sites, this should be met through direct provision rather than through site allocations. In areas constrained by Green Belt, national policy should be amended to state that the need for public sites is capable of outweighing the harm to the Green Belt, so as to establish very special circumstances.

FRIENDS, FAMILIES & TRAVELLERS

8. Local plans — The mainstreaming of site provision

In order to ensure that Gypsy and Traveller needs are met, Local Plans should not be found to be sound unless the public need for sites has been addressed either through allocation or direct provision, and that there are sufficient allocations to meet a significant percentage of the private need. As such, there should be consequences for not providing sites. Furthermore, this will enable Gypsy and Traveller site provision to become more normalised.

9. Approach to the Green Belt

National planning policy on Green Belt should be amended, in order to be more permissive of sites in areas which are subject to significant constraint.

10. Negotiated Stopping

All local authorities should have a negotiated stopping policy, in order to meet the needs of Gypsies and Travellers passing through their area.

11. Engagement with social housing providers

The National Policy Advisory Panel[26] is an independent network of Registered Social Housing Providers, local authorities, Central Government and VCS (Voluntary and Community Sector) groups. We recommend that social housing providers engage with this forum to seek answers and support in the development and management of Gypsy and Traveller sites in England and Wales.

[25] [26] www.gypsy-traveller.org/oak-project/

CONCLUSIONS

From this study it is evident that the post-1994 planning regime has failed to provide sites for Gypsies and Travellers who require public provision through local authorities.

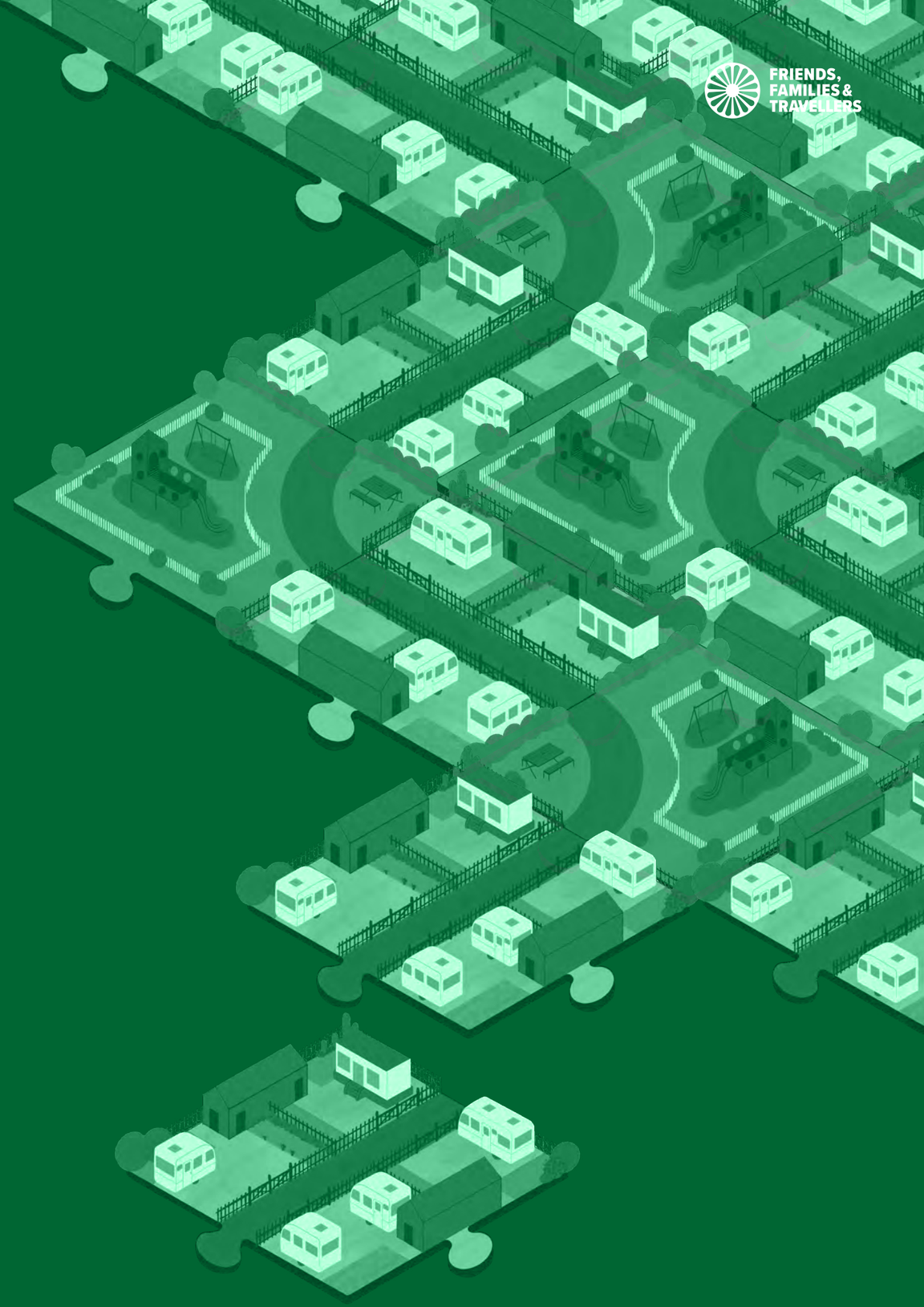
Whilst there has been significant levels of private provision in some areas, in others with constraints, this has not been the case.

It is evident that the regional approach that existed between 2006-2011 was able to offer benchmarking of GTANAs which impacted on need levels. However, no evidence was found of successful regional approaches after this.

Since 2011, the law and policy relating to Gypsies and Travellers has become increasingly more challenging. Local Planning Authorities are able to continuously fail to meet the needs of their communities with no consequence. Furthermore, the research found multiple instances of problematic approaches to the assessment and meeting of need.

In contrast, there were also some positive recent examples of good practice in Bristol and Leeds. What this demonstrates is that it is possible for provision to be made even with a less permissive regime that exists at present. It just requires Local Planning Authorities to be willing to address the issues in a sensible and pragmatic manner.

www.gypsy-traveller.org/oak-project/



Appendices: The list of the 15 Local Planning Authorities area profiles

1. Basildon area profile
2. Brighton area profile
3. Bristol area profile
4. Carlisle area profile
5. Cheshire West and Chester area profile
6. Cornwall area profile
7. East Hampshire area profile
8. Leeds area profile
9. Manchester area profile
10. Preston area profile
11. Runnymede area profile
12. Southwark area profile
13. Swale area profile
14. Wirral area profile
15. Wychavon area profile

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