

Traveller Accommodation Assessment



Contents

Executive Summary	4
1. Introduction	5
2. Policy Context	6
3. Methodology	15
4. Stage One: Gathering existing data	19
5. Stage Two: Family Generation Trajectory from existing sites	31
6. Stage Three: Assessment of Accommodation Need.....	35
7. Constraints.....	52
8. Conclusions	54

Glossary

Bricks and Mortar	Permanent mainstream housing.
Caravan	Mobile living vehicles also referred to as trailers or touring caravans.
Concealed Households	This refers to someone living within a household but wanting to move to their own accommodation to form a separate household (e.g. adult children, 18 years old and above, living at home). They are also sometimes referred to as suppressed households.
Gypsy/Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.
Household	One person or a group of people (not necessarily related) living at the same address, in one or more mobile homes and/or caravans, and sharing at least one meal a day and housekeeping costs.
Mobile Home	Legally a caravan but not normally capable of being moved by towing.
Pitch	A piece of land which generally accommodates one mobile home and one touring Gypsy caravan, amenity and storage space, amenity building and parking.
Plot	A piece of land of unspecified size which accommodates Travelling Showpeople's caravans, trailers, mobile homes and sometimes equipment.
Settled Community	Reference to non-travellers.
Transit Site	A permanent site intended for short-term temporary use by travellers on the move.

Travelling Showpeople	Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependant's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers.
Traveller	Term often used to refer to the ethnic group of Irish Travellers with a heritage of travelling.
Travellers	A non-ethnic description for the purposes of planning to encompass all those of a travelling way of life whatever their race or origin. The term "travellers" means "gypsies and travellers" and "travelling showpeople" as defined above.
Unauthorised development	Land privately owned but without the benefit of planning permission.
Unauthorised encampment	Land occupied by Gypsies, Travellers and Travelling Showpeople and their homes but without the benefit of planning permission or the permission of the land owner. Can include land at the side of the road.

Executive Summary

The Epsom & Ewell Traveller Accommodation Assessment (TAA) has been prepared to inform our emerging local planning policies in respect of meeting the needs of our Gypsy & Traveller communities. It forms the basis on which we will identify the scale of any new site allocations to meet accommodation needs up to 2032. This Assessment is an update to the 2014 document. It takes full account of the changes to the National Planning Policy for Traveller Sites document published during August 2015 and brings all available data up to date.

The baseline date for the Assessment is April 2017.

The Assessment has been produced in accordance with National Planning Policy and through utilising a modified version of The Surrey Methodology. It includes a desktop review of existing local authority data together with the preparation of family generation trajectories for both of our existing Gypsy & Traveller sites.

The Assessment considers the amendments to the planning definition of 'Gypsies and Travellers'. The key change is that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

The Assessment identified a need for 27 pitches and zero Travelling Showpeople plots over the period 2017-2032. Of these 14 pitches are needed in the first five years to 2022. This equates to an annualised requirement of 1.8 pitches and zero plots. There is no identified need for transit accommodation over the period 2017-2032.

However, upon application of the new planning definition, it was concluded that none of the need for new additional pitches is for 'Gypsies and Travellers'- as defined by National Planning Policy. As a consequence the Assessment identifies that there is no requirement for new additional pitches to meet the accommodation needs of the local Gypsy and Traveller communities.

Nevertheless, the Council has a duty to consider the accommodation needs of 'caravan dwellers' or 'non-travelling Gypsies' in the Borough. Consequently the pitch requirement identified should be considered within the Local Plan making process.

The Assessment also provides an overview of the constraints to delivery; in terms of land supply and the likelihood that our need (for non-travelling Gypsies) will have to be met through the allocation of public sites.

1. Introduction

- 1.1 The Accommodation Assessment provides the initial evidence base needed to support our planning policy approach to meeting the needs of our local Gypsy, Traveller and Travelling Showpeople communities.
- 1.2 We have produced the Assessment in accordance with the provisions of the Housing Act 2016 and the guidance contained within the government's *Planning policy for Traveller sites* (August 2015). It is important to highlight that national policy and legislation requires us, as both local planning authority and the local housing authority, to set pitch targets which address the accommodation needs of our local Gypsy & Traveller communities. Critically, in respect of the local plan process, it also requires us to identify a rolling supply of sites in order to meet this need.
- 1.3 The August 2015 revision of the government's policy guidance (first published in March 2012) amended the definition of 'Gypsies and Travellers' and 'Travelling Showpeople' to exclude those that have 'permanently ceased to travel'. The new definition is set out in section 2 (para 2.13).
- 1.4 The Assessment sets out the evidence needed to derive locally set targets for pitch provision for Gypsies & Travellers and Travelling Showpeople. Subsequently we will need to identify and allocate sufficient sites through the Site Allocations Development Plan Document in order to meet the need identified by this TAA.
- 1.5 In preparing our Assessment we have used a modified version of the Surrey Methodology to calculate our need for pitch provision. Our methodology takes advantage of our unique position in Surrey of having a Gypsy & Traveller Liaison Officer who interacts with our Gypsy & Traveller community on a regular basis. This has allowed us to utilise local intelligence to plot family generation trajectories for our existing sites. We have combined this with a desktop review of our existing data to assess the needs of the Gypsy & Traveller and Travelling Showpeople communities over a 15 year period. We believe that our methodology produces more accurate results and is less intrusive than the traditional questionnaire-based approach. In light of the revised planning definition we have also distributed a short survey to residents of the two Sites within the Borough to establish how many households falls within the definition.
- 1.6 The Assessment's conclusions form the evidence base required to set Borough-wide pitch targets and to help identify potential site allocations to meet any identified need.

2. Policy Context

Historical Approach

- 2.1 Prior to 2010, the accommodation needs of the Gypsy & Traveller community were assessed on a regional basis. The number of pitches to be provided by each local authority was determined by the Regional Spatial Strategies (RSS). In the South East this was to be determined by a single issue review of the South East Plan, led by the South East England Partnership Board (SEEPB)¹. This review was based on individual Gypsy and Traveller Accommodation Assessments (GTAAAs) undertaken by local authorities.
- 2.2 As part of this regional process we prepared a GTAA in partnership with the other East Surrey authorities, which was to become part of the South East Plan. This work identified need at the local level and then undertook a redistribution of need to take account of migration trends and, to a lesser extent, site availability and deliverability. The former is significant due to the traditionally nomadic culture of the Gypsy & Traveller community. The regional approach to identifying need and setting targets had some merit as it sought to address the issue at the strategic scale. Significantly, the regional approach also provided a mechanism for redistribution across the South East, something that is noticeably absent within the current process; and is not addressed under the Duty to Co-operate. The Assessment will consider the work undertaken for the South East Plan in more detail later in the document.

National Planning Policy

Planning policy for Traveller sites

- 2.3 In 2012 the government published the document [*Planning policy for Traveller sites \(PPTS\)*](#). This was replaced by a revised version in 2015. The 2015 revised document was the result of a Government consultation on proposed changes to planning policy. The purpose of the consultation was to amend the document to ensure equal treatment to both the traveller and settled communities. This was addressed by amending the definition of 'Gypsy and Traveller' and 'Travelling Showpeople' to remove those who have ceased to travel 'permanently' from the definition (see para 2.13 below). The changes also seek to increase the protection of sensitive areas such as the Green Belt.
- 2.4 This document is the principal piece of planning policy guidance in relation to this issue. It places the responsibility for the provision of new sites for the Gypsy & Traveller community entirely in the hands of

¹ Formerly the South East England Regional Assembly (SEERA)

local planning authorities. It seeks to ensure fair and consistent treatment for Travellers, in a way that supports their traditional and nomadic way of life while respecting the interests of the settled community.

2.5 To achieve this, the guidance states:

- 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
- to encourage local planning authorities to plan for sites over a reasonable timescale
- that plan-making and decision-taking should protect Green Belt from inappropriate development
- to promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies
- to increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- to reduce tensions between settled and Traveller communities in plan-making and planning decisions
- to enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure
- for local planning authorities to have due regard to the protection of local amenity and local environment

2.6 For the purpose of our Accommodation Assessment, two policies are relevant:

Policy A: Using evidence to plan positively and manage development emphasises effective community engagement, collaborative working and the use of a robust evidence base to establish accommodation needs.

Policy B: Planning for Traveller sites states that local planning authorities should set pitch targets which will address the accommodation needs of their Gypsy & Traveller communities, working collaboratively with neighbouring local planning authorities.

2.7 Furthermore, Policy B also states that, in preparing their pitch targets, local planning authorities should:

- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
- identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
- 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)
- 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
- protect local amenity and environment

National Planning Policy Framework

2.8 The government states that *Planning policy for Traveller sites* should be read in conjunction with the National Planning Policy Framework (NPPF) so far as relevant. The NPPF sets out the overarching policy priorities for the planning system, against which local plans are being prepared and decisions made on planning applications.

2.9 The NPPF directs local planning authorities to *Planning policy for Traveller sites* when assessing the accommodation needs of Travellers, and it will be an important consideration when identifying sites for Gypsy & Traveller accommodation once a needs assessment has been completed. This will be in parallel with local planning policies which guide site selection.

The Housing and Planning Act 1985

2.10 The requirement to assess the accommodation needs of the Gypsy & Traveller community is found in the Housing and Planning Act 1985 (as amended by the Housing and Planning Act 2016). The 1985 Act requires local housing authorities to include Travellers in their accommodation assessments and to take a strategic approach, including drawing up a strategy demonstrating how the accommodation needs of Travellers will be met. We are the local housing authority for Epsom and Ewell and must therefore discharge this additional duty.

Local Planning Policy

2.11 Our Core Strategy was adopted in 2007 and includes a policy (Core Strategy Policy CS10) that sets out the intention to meet

accommodation needs (once identified). The regional approach to calculating accommodation need influenced the preparation of Core Strategy Policy CS10. This policy is now out of date inasmuch as it refers to the accommodation assessments being undertaken as part of the South East Plan review. Therefore, provision for additional sites will be made via the emerging Local Plan on the basis of the findings of this assessment.

- 2.12 In accordance with national policy, we have included a criteria based policy to guide the decision-making process regarding new Gypsy & Traveller sites via our Development Management Policies DPD (September 2015). Policy DM23 states that proposals for new sites will:
- i. have good access to local services including shops, schools, GPs and other health services;
 - ii. have good access to and from the public highway, bus routes and other transport modes;
 - iii. demonstrate that they are compatible with any existing neighbouring residential uses;
 - iv. not involve the erection of unsightly, significant permanent structures;
 - v. not be located in areas of high flood risk;
 - vi. not be located on contaminated land; and
 - vii. result in no net loss of biodiversity.

Planning Definitions

- 2.13 The August 2015 Planning Policy for Traveller Sites' (PPTS) guidance document states:

For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.*
- b) The reasons for ceasing their nomadic habit of life.*
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

- 2.14 No definition or guidance is provided in the PPTS of what is meant by “...ceased to travel temporarily,...” or what constitutes “a nomadic habit of life...”. In the absence of any guidance we have sought best practice from recent assessments prepared elsewhere. Many of these have been prepared by Opinion Research Services who specialise in GTAAs. Recent locally prepared assessments (produced during late 2016-2017) include Elmbridge BC, Lewisham and the Hampshire Consortium.
- 2.15 A summary of case law in relation to the term ‘nomadic’ and what constitutes ‘travelling’ is outlined below.
- 2.16 **R v South Hams District Council (1994)**- defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- 2.17 **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 2.18 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life only seasonally. The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought judicial review of the local authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- 2.19 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 2.20 In line with other recently published GTAA's the implications of these rulings in terms of applying the new definition is that it will only include those who travel (or have temporarily ceased to travel) for **work purposes and in doing so stay away from their usual place of residence**. It will not include those who commute to work daily from a permanent place of work.
- 2.21 This is an area where case law is likely to continue to develop over time but for the purposes of this assessment in 2017 the Council has taken a pragmatic approach and looked to recently published assessments for best practice. Our approach and justification is set out below.
- 2.22 As of May 2017 only a small number of appeal decisions have been issued by the Planning Inspectorate on how the new definition should be applied. These support the view that households need to be able to provide information that they travel for **work purposes** to meet the new definition, and stay away from their usual place of residence when doing so, or have ceased to travel temporarily due to education, ill health or old age but intend to travel (for work purposes) again in the future.
- 2.23 In this Assessment, those households who have indicated in our the survey that they **do not travel for work purposes and do not intend to travel again** have been considered to **not meet the revised planning definition**. Those households (part or whole) that still travel for work or **intend to travel in the future** but have temporarily ceased to travel due to education, health needs or old age were considered to meet the definition. Those families will need to demonstrate that they have travelled in the past. Households where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems have been defined as travelling under the new definition.
- 2.24 It is challenging to predict at this point whether households that may form in the future as a result of demographic growth (currently children/ young teenagers) will choose to lead a nomadic habit of life and therefore meet the planning definition. Newly forming families/ households make up a proportion of the pitch requirements for the next 15 years. In this Assessment it has been assumed (unless other information is available) that the young family members will continue to

lead similar nomadic lifestyles as their family currently enjoy. This forms the basis for which category their need falls under. This is considered to be a positive and proportionate approach to assessing need.

Non- Travelling Households

- 2.25 The implication of the change to the planning definition is that the housing needs of any Gypsy, Traveller or Travelling Showperson households who do not meet the new 'planning' definition of a Traveller will not form part of the 'Gypsy and Traveller' need in this assessment. Nevertheless the Council still has a duty under the Housing Act 1985 to 'consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed'. Furthermore, the Equality Act 2010 requires that Romany and Irish Travellers are provided with culturally sensitive and appropriate accommodation (IE mobile homes) even if they do not 'travel'.
- 2.26 This 'non travelling' need must be assessed as part of the wider housing needs of the area. This could potentially be carried out through the Strategic Housing Market Assessment (SHMA) process. If that approach were taken any identified need could be classified as a subset of the wider need arising from 'households residing in caravans'. Whilst it is not a requirement to include details of need from Non-Travelling Gypsies and Travellers in the TAA, Local Authorities will still need to consider how they should have their accommodation needs addressed under the provisions of the National Planning Policy Framework. An assessment of this need has therefore been made to support the Council with its Local Plan making.

Unknown Households

- 2.27 As well as calculating needs for households that meet the new definition, the needs of the households where a survey was not completed or their nomadic habits have not been identified through the knowledge of the Gypsy Liaison Officer need to be considered. These are generally referred to as "unknown" or "hidden" households.
- 2.28 Some Local Authorities apply an average percentage to account for this number. This seeks to reflect the percentage of those who are known to be or not be gypsies under the new definition. This is considered to be a reasonable approach, which has been applied by this Assessment - alongside any more detailed information we have from the family formation and over-crowding data.

- 2.29 The additional needs and pitch requirements will be set out in three forms;
1. Gypsies and Travellers meeting the new planning definition including those who may have ceased to travel temporarily under the new definition
 2. Households who may meet the planning definition but have not been verified
 3. 'Non Travelling' Gypsies and Travellers (households residing in caravans but do not travel or have ceased to travel permanently)

3. Methodology

- 3.1 In preparing our TAA, we have taken account of national legislation and guidance. *Planning policy for Traveller sites* emphasises the need for collaborative working through the “Duty to Cooperate” as set out in the Localism Act and within the National Planning Policy Framework. Significantly, this requires that local planning authorities demonstrate collaboration with one another during the preparation of their accommodation assessment work.
- 3.2 In order to meet this requirement, the Surrey authorities prepared a joint methodology for conducting Gypsy & Traveller needs assessments. This was prepared collaboratively with all of the Surrey boroughs and districts. During the preparation of the Surrey methodology, the Surrey authorities took into account:
- The DCLG’s *Planning policy for Traveller sites*;
 - DCLG guidance on Gypsy and Traveller Accommodation Assessments (from 2007);
 - Criticism of previous accommodation assessments; and
 - Knowledge and experience of assumptions featuring in other accommodation assessments.
- 3.3 In accordance with national guidance, the Surrey Methodology identifies the accommodation needs of the Gypsy & Traveller community using a three stage process:
- a desktop review of existing data;
 - interviews with the Gypsy & Traveller community; and
 - a review based on this data.
- 3.4 In accordance with *Planning policy for Traveller sites* and the Surrey Methodology, the aims of this Traveller Accommodation Assessment are to:
- a) create a robust, transparent and consistent evidence base to identify the need for Gypsy and Traveller pitches and Travelling Showpeople plots in the borough;
 - b) identify current levels of accommodation provision in the Gypsy, Traveller and Travelling Showpeople communities;
 - c) identify current levels of need, including overcrowding, concealed households, households living in bricks and mortar housing but wishing to live on sites, identifying households living on sites but wishing to live in bricks and mortar housing;
 - d) show household preferences in terms of the location, tenure and type of accommodation sought;

- e) identify the size and type of accommodation provision needed, including the demand for authorised sites (both static and transit) and for permanent affordable housing provision;
- f) identify future levels of accommodation need over a fifteen year period;
- g) inform the development of future housing and planning policy at a borough level; and
- h) inform the Council's understanding of the need for permanent and transit pitches and plots.

3.5 The Surrey methodology identifies a series of figures that are required in order to identify a target. The need is calculated by identifying the total demand and subtracting the projected supply.

Current Supply:

- A. Current supply of occupied local authority residential site pitches/plots in local authority area
- B. Current supply of authorised and occupied privately owned site pitches/plots in local authority area
- C. Unauthorised pitches/plots tolerated for more than 10 years

Projected Supply:

- D. Number of unused/vacant local authority pitches/plots
- E. Number of unused/vacant authorised privately owned pitches/plots
- F. Number of existing pitches/plots expected to become vacant in the near future (LA and privately owned)
- G. Number of households in site pitch/plot accommodation expressing a desire to live in bricks and mortar housing (in next five years)
- H. New local authority pitches/plots planned during years 1-5
- I. Existing applications for private pitches/plots (including unauthorised sites) likely to gain planning permission during years 1-5

Current Demand:

- J. Households seeking permanent site accommodation in the area
- K. Households on unauthorised encampments expressing a need to reside in the Borough/District
- L. Households currently on unauthorised developments for which planning permission is unlikely to be granted
- M. Currently overcrowded or doubled up households
- N. Temporary planning permissions due to expire before 2018

Future Demand:

- O. Future need: New family formations expected to arise from existing borough households 2013-2018

3.6 We used a modified form of the Surrey Methodology to prepare our Accommodation Assessment. We believe that the traditional

questionnaire-based approach to calculating need has several disadvantages. Firstly, the Gypsy & Traveller community have expressed dissatisfaction with this approach in the past including specific concerns that it has yielded little on-the-ground provision. Secondly, there is the issue of consultation fatigue, with the Gypsy & Traveller community feeling that they are constantly subjected to consultation, which could result in an inadequate response rate or inaccurate information being obtained. This does not help to establish an accurate picture of the needs of the community.

- 3.7 Fortunately, the Borough is in a unique position in Surrey in that we have a dedicated Gypsy & Traveller Liaison Officer who knows our community very well and is in regular contact with them. This very important resource allows us to engage directly with our existing Gypsy & Traveller communities without the need for specialised consultation. Consequently, we are able to utilise this Officer's expertise, knowledge and contacts to map a site specific Gypsy & Traveller family generation trajectory. Similarly Surrey County Council provided as much information as possible about the residents at the site that they manage in the Borough. We can use this to identify the scale of our need for new pitches over the course of the plan period and provide a timeframe for when this need is likely to materialise.
- 3.8 In light of the amended definition, a short survey has been distributed to our current residents at the Borough's Sites. This serves as an addition to our methodology. The addition of the survey was necessary in order to determine whether the households at each of the Council's current sites fall under the new definition or not.
- 3.9 Furthermore, an analysis of the households on the Surrey CC waiting list has also been carried out in an attempt to determine whether they would fall under the new definition or not. This additional analysis also sought to establish whether these households are already residing in the Borough (in bricks and mortar accommodation) or whether they have been double counted - as residing on currently over-crowded pitches.
- 3.10 In preparing the Assessment we have combined the family generation trajectories with a desktop review of other data in line with the Surrey Methodology to assess our need and calculate a pitch target. We are confident that this methodological approach produces a more accurate assessment of need than the conventional questionnaire-based approach. It is also less intrusive and represents a proportionate evidence base to the Borough's specific local needs.

3.11 In light of the change in planning definition, a fourth stage has been added to determine which category the need falls under;

1. Gypsies and Travellers meeting the new planning definition including those who may have ceased to travel temporarily under the new definition
2. Households who may meet the planning definition but this has not been verified
3. Non Travelling Gypsies and Travellers (households residing in caravans but that do not travel or have ceased to travel permanently)

3.12 In preparing our Assessment we followed a four-stage process:

- Stage One: Desktop review of existing data
- Stage Two: Family Generation Trajectory from existing sites
- Stage Three: Assessment of need
- Stage Four: Determination of Need Category

4. Stage One: Gathering existing data

- 4.1 The first stage of the Assessment process comprised a review of the available literature and secondary sources obtained from government (central and local) and regional and community bodies. This included the collection and review of:
- Data from previous Gypsy and Traveller Accommodation Assessment (GTAA)
 - Biannual Gypsy and Traveller caravan counts and annual Travelling Showpeople counts for the Borough
 - Census data
 - Planning history data on public and private authorised traveller sites including information on the number of caravans permitted on each site, whether the planning permission was granted on a permanent or temporary basis, and whether it restricted occupancy to named individuals
 - Information on planning applications for traveller caravan sites which have been refused planning permission by the local planning authority over the previous 5 years and planning appeal records.
 - Current planning applications and planning appeals within the borough awaiting determination
 - Unauthorised traveller sites, encampments and developments including information on the number of caravans and family groups on each site, length of occupation, and the up to date position regarding planning applications, appeals and outcomes and/or enforcement action
 - Surrey County Council traveller site waiting list information- this includes the current addresses, ethnicity and details of need.
 - Housing needs register
 - Information on households in bricks and mortar accommodation
 - Data from other local authorities

Previous Gypsy and Traveller Accommodation Assessment (GTAA)

- 4.2 We previously undertook a Gypsy & Traveller Accommodation Assessment in 2007 as part of the South East Plan process. The GTAA was prepared jointly with the other East Surrey authorities (Mole Valley, Reigate & Banstead and Tandridge). Anglia Ruskin University was commissioned to undertake the study. The baseline figure in 2007 for the Borough was 30 authorised Gypsy & Traveller pitches and four Travelling Showpeople plots. The study identified two public (local authority) sites, no permanent private Gypsy & Traveller sites, no transit sites, and one private Travelling Showpeople site.
- 4.3 The East Surrey GTAA (2007) identified a need for an additional 57 Gypsy & Traveller pitches and nine additional Travelling Showpeople

plots over the period 2006-2016 across the whole of the East Surrey area. The conclusion from the GTAA informed the East Surrey authorities' advice to the South East England Regional Assembly (SEERA) as part of the South East Plan partial review process. This gave two different options for site distribution that could have resulted in a requirement to deliver either 13 or 14 additional pitches in Epsom & Ewell during the period 2006-2016. This work was used to inform the abortive South East Plan Partial Review, which was to have identified specific needs targets across the Region. Although the Partial Review progressed to an examination in public, the revocation of the regional planning tier brought the process to a halt and introduced the requirement for individual Assessments.

- 4.4 In 2013 work started on a review of the GTAA in line with the (then) current guidance and the NPPF. This was to inform the preparation of our Local Plan. The draft document was complete in 2014 but was never published. This is now out of date so will be replaced in its entirety by this document.

Biannual Gypsy and Traveller caravan counts and annual Travelling Showpeople counts for the Borough

- 4.5 The biannual caravan count has been undertaken since 1979, and provides a useful starting point in assessing the current scale and distribution of caravan numbers across the Borough. It is also useful in examining recent trends. However, there are issues in terms of the robustness of the count, as it is only a "snapshot" in time, and only counts caravans rather than households. It also excludes Gypsies and Travellers in bricks and mortar accommodation. The count was also renamed the *Traveller caravan count* in July 2013, meaning that it incorporates both ethnic Gypsies and Travellers as well as other non-traditional Travellers.
- 4.6 The data in Table 1 indicates that the number of caravans in the Borough has remained relatively constant over the previous 10 years, although there has been a slight rise over the last two years. The caravans have all been located on the existing public sites in the Borough and not on other unauthorised sites. Although historically we have not had any caravans found to be on unauthorised sites when the count has taken place, this trend cannot be guaranteed to continue if evidence suggests need is rising.
- 4.7 The annual Travelling Showpeople caravan count has only been undertaken since 2011 and therefore does not provide as robust a source of data as the biannual Gypsy and Traveller caravan count.

Table 1: Epsom & Ewell Biannual Gypsy & Traveller Caravan Count 2003-2016

Date	Authorised Sites		Unauthorised Sites		Total
	Caravans on Socially Rented Sites	Caravans on Private Sites	Caravans on unauthorised developments	Caravans on unauthorised encampments	
Jan 03	39	0	0	0	39
Jul 03	41	0	0	0	41
Jan 04	26	0	0	0	26
Jul 04	29	0	0	0	29
Jan 05	26	0	0	0	26
Jul 05*	-	-	-	-	-
Jan 06	-	-	-	-	-
Jul 06*	-	-	-	-	-
Jan 07	27	0	0	0	27
Jul 07	28	0	0	0	28
Jan 08	27	0	0	0	27
Jul 08	31	0	0	0	31
Jan 09	27	0	0	0	27
Jul 09	25	0	0	0	25
Jan 10	25	0	0	0	25
Jul 10	25	0	0	0	25
Jan 11	25	0	0	0	25
Jul 11	27	0	0	0	27
Jan 12	22	0	0	0	22
Jul 12	34	0	0	0	34
Jan 13	35	0	0	0	35
Jul 13	36	0	0	0	36
Jan 14	27	0	0	0	27
Jul 14	42	0	0	0	42
Jan 15	37	0	0	0	37
Jul 15	28	0	0	0	28
Jan 16	25	0	0	0	25

*Data for the July '05, January '06 and July '06 counts is unavailable

Table 2: Epsom & Ewell Travelling Showpeople Caravan Count 2011-2013

Date	Caravans on Authorised Sites	Caravans on Unauthorised Sites
Jan 11	0	0
Jan 12	0	0
Jan 13	0	0
Jan 14	0	0
Jan 15	0	0
Jan 16	0	0

Census Data

- 4.8 The 2011 census was the first time that Gypsies and Irish Travellers were recorded as a separate ethnic group. The census recorded 132 people of Gypsy or Irish Traveller ethnicity out of a total Borough population of 75,102. This equates to just 0.2% of the Borough's population. It is noted that Travelling Showpeople are not identified as a separate ethnic group by the census.

Planning History

- 4.9 At the time of the TAA, there are two local authority sites and no other temporary or permanent authorised private sites in the Borough. There is one authorised private Travelling Showpeople site in the Borough. Additionally, we make provision for a temporary traveller site on Epsom Racecourse for two weeks every year to coincide with the Epsom Derby Festival. This information is set out under Table 3. There have been no additional public or private sites provided since 1978. It is highlighted that no new sites have been promoted through Local Plan call for sites/ site allocations process.

Table 3: Planning History of sites in Epsom & Ewell

Site	Planning Reference	Number of Caravans	Permanent/ Temporary	Decision
Derby EH Inspections, Grand Stand Road, Epsom	98/00051/FUL	230	Permanent – use of land each year for a two week period during the Derby race meeting	Granted
Land adjoining Langley Vale Road, Epsom	92/00154/ZFL	230	Temporary – use of land each year between 1992 and 1997 inclusive for a two week period during the Derby race meeting	Granted

Table 4: Planning applications refused permission and appeal data

Site	Planning Reference	Number of Caravans	Permanent/ Temporary	Decision
288 Chessington Road, West Ewell	07/00480/FUL	3	Temporary (1 year)	Refuse
Tattenham Corner Stables, Tattenham Corner Road, Epsom	04/01195/FUL	2	Temporary	Refuse (Appeal dismissed 17/11/2005)

- 4.10 Table 4 illustrates the scale of historic planning applications and it is highlighted that there are currently no planning applications or appeals for Gypsy and Traveller sites awaiting determination.

Unauthorised Sites

- 4.11 The Assessment examined data relating to both unauthorised developments and unauthorised encampments.
- 4.12 Unauthorised developments are defined as pitches/plots on land owned by the residents but without planning permission (excluding those that have been tolerated for more than 10 years) and not expected to receive planning permission. Since these sites are, by definition, unauthorised, these households are in need of authorised legal accommodation, whether through the granting of planning permission, the provision of other accommodation options or the provision of accommodation elsewhere.
- 4.13 There are currently no unauthorised developments in the Borough and no unauthorised developments that have been tolerated for more than 10 years.
- 4.14 Unauthorised encampments are defined as pitches/plots on land not owned by the residents. We have no current enforcement cases relating to unauthorised encampments within the borough.
- 4.15 The presence and incidence of unauthorised encampments is often a significant issue that impacts upon local authorities, landowners, Gypsies and Travellers and the settled population. Unauthorised encampments have often become synonymous with the Gypsy and Traveller community due to their location on public and private land.
- 4.16 Due to the nature of unauthorised encampments (among other things - their unpredictability and seasonal fluctuations), it can be difficult to

extrapolate a comprehensive picture of need without considering a range of interconnected issues. It is highlighted that the caravan count data above (Table 1) shows that the level of unauthorised encampment has been at a consistently low level in recent years.

- 4.17 Our records indicate 17 instances of unauthorised encampments over the past 2 years- these are summarised below. It is suspected that many of these are by the same family/ group but no information is available to confirm this.

Table 5: Unauthorised Encampments 2015 and 2016

Site	Number of Caravans	Length of Occupation	Planning Position
2015 (calendar year)			
Norris Close, Epsom	2	21/9/15 length unknown	Private landowner removed
Nimbus Road, Epsom	one car, three caravans, two lorries and a horse box	26 th November 215 – 6 th December 2015	EEBC removed
Harvester Road, Epsom	5	26/11/15 length unknown	Private landowner removed
Houghton Lane, Epsom	5	21/12/15 length unknown	SCC removal by agreement
Wheelers Lane	Unknown	Less than 2 weeks	EEBC removed
Stoneleigh Parade Car Park	one caravan, one car.	On site between May/June 2015 and 28 th October 2015	EEBC removed
Court Lane Car Park	two caravans, one lorry and one horse box	11 th -15 th December 2015	EEBC removed
Hook Road Arena	two caravans, one lorry and one horse box	21 December- 4 January	EEBC removed

Site	Number of Caravans	Length of Occupation	Planning Position
2016 (calendar year)			
Blenheim Road	one caravan, one car	25 Jan – 4 February 2016	EEBC removed
Haven Way	three caravans, one car, one lorry and one horse box - 6 th – 12 th April 2016	6 th – 12 th April 2016	EEBC removed
Blenheim Road	three caravans, one car, one lorry and one horse box	12 th -21 st April 2016	EEBC removed
Felstead Road	two caravans, one vehicle	21 st April – 3 rd June 2016	EEBC removed
Nonsuch Park	one transit, one car, one caravan and one campervan	10 th -15 th August 2016	EEBC removed
Nonsuch Park	one transit, one car, one caravan, one campervan	22 nd – 27/28 th August 2016	EEBC removed
Northcroft Road	5	6/1/16	SCC removal by agreement
Cherry Tree Lane	5	11/3/16 Unsure of length	Bailiff Removal
Christ Church Road	6	11/3/16 Unsure of length	SCC Removal (S78 notices)

Housing Needs Register

- 4.15 Our Housing Needs Register does not record ethnicity and it is therefore difficult to provide a definitive number of people on the register who are Travellers. From other records, it is estimated that there are two families on the housing register² who live on sites or have a connection to a site.

Surrey County Council traveller site waiting list

- 4.16 Surrey County Council manages the site at Conifer Park, Kiln Lane. The site traditionally provided accommodation on 14 pitches. Over the years the internal layout of the pitches have changed for various

² See Paragraph 4.19 for further information.

reasons and Surrey CC now see this site as a 7/8 pitch site. All sites are occupied with some doubling up.

- 4.17 The County Council maintains a waiting list for all its sites across Surrey. There are currently 98 applicants on the waiting list. It is noted that of those applicants on the waiting list, eleven have specifically requested a pitch at the Kiln Lane site, whilst another four have stated that they would consider the site along with any site in Surrey.
- 4.18 The allocation of vacant pitches is based on Surrey County Council's allocation criteria, which includes an assessment of need, links to the area and personal and other relevant circumstances.

Information on households in bricks and mortar accommodation

- 4.19 It is difficult to provide accurate data on the number of Travellers housed in bricks and mortar accommodation and the precise number of families housed in this type of accommodation is unknown. On the basis of local intelligence our Gypsy & Traveller Liaison Officer estimates that there are potentially 25 Gypsy and Traveller families currently living in bricks and mortar accommodation in the Borough. Of these, it is felt that two families may wish to return to traditional accommodation as they are in unsuitable bricks and mortar provision.

Data from other Local Authorities

- 4.20 Surrey County Council owns 17 sites in Surrey, and manages nine of these. The location, scale and management arrangements of these sites are set out under Table 6 below.

Table 6: Local Authority Sites in Surrey

Site	Borough	Management	No. of Pitches
Conifer Park, Kiln Lane, Epsom	Epsom & Ewell	SCC	7
Greenlands, Cox Lane, Ewell	Epsom & Ewell	EEBC ³	16
The Oaks, Woodstock, Claygate	Elmbridge	SCC	15
Ash Bridge, Ash	Guildford	GBC	13
Cobbetts Close, Normandy	Guildford	GBC	17
Salvation Place, Young St, Leatherhead	Mole Valley	SCC	10
Conifer Park, Ranmore Rd, Dorking	Mole Valley	SCC	3
Travellers Rest, Swanworth Rd, Mickleham	Mole Valley	SCC	3
Brambledown, Coldharbour Lane, Dorking	Mole Valley	SCC	3
Elm Farm, Lyne Crossing, Lyne	Runnymede	RDC	15
The Paddocks, Lyne Road, Lyne	Runnymede	RDC	15
Littleton Lane, Shepperton	Spelthorne	SCC	10
Swift Lane, Bagshot	Surrey Heath	SHDC	15
Kalima, Chobham	Surrey Heath	SHDC	15
Ivy Hatch, Green Lane, Outwood	Tandridge	TDC	14
Pendell, Bletchingley	Tandridge	SCC	4
The Willows, Tongham Road, Runfold	Waverley	SCC	10
The Hatchington, Worplesdon	Woking	SCC	16

³ The management of the Greenlands site will be transferred from Epsom & Ewell Borough Council to Surrey County Council from 1 July 2017 onwards.

- 4.21 Table 7 below shows the baseline position in respect of the other Surrey authorities from the GTAA's conducted in 2006/07 and the South East Plan Examination. This is a useful indication of the historic level of provision across Surrey in terms of both private and public sites.

Table 7: Number of Traveller Pitches/Plots from 2006 Baseline

Borough/District	Gypsy & Traveller Pitches	Travelling Showpeople Plots
Elmbridge	30	2
Epsom & Ewell	30	4
Guildford	42	0
Mole Valley	20	1
Reigate & Banstead	12	12
Runnymede	61	46
Spelthorne	22	10
Surrey Heath	30	0
Tandridge	33	37
Waverley	56	6
Woking	24	0

- 4.22 The majority of the boroughs and districts in Surrey have recently prepared their own Traveller Accommodation Assessments. Table 8 below shows the findings of these assessments in terms of identified need. N/A is recorded where there is no up-to-date Traveller Accommodation Assessment in place. As shown in Table 8, many of the other Surrey authorities have identified significant levels of future need in their assessments, particularly Guildford, Tandridge and Reigate & Banstead. When cross-referenced with Table 7 above, it is evident that further pitch provision has been delivered in many of the Surrey authorities in the period between 2006 and 2013.

Table 8: Other Traveller Accommodation Assessments in Surrey

Borough/District	Existing Provision		Future Need	
	Gypsies & Travellers	Travelling Showpeople	Gypsies & Travellers	Travelling Showpeople
Elmbridge	41	2	36	0
Guildford	50	12	73	8
Mole Valley	26	3	44	7
Reigate & Banstead	10	10	52	13
Tandridge	44	48	63	26
Waverley	59	9	39	8
Woking	32	0	19	0
Runnymede	N/A	N/A	N/A	N/A
Spelthorne	N/A	N/A	N/A	N/A
Surrey Heath	N/A	N/A	N/A	N/A

5. Stage Two: Family Generation Trajectory from existing sites

- 5.1 As stated previously, we are fortunate to be in the unique position in Surrey of having a dedicated Gypsy & Traveller Liaison Officer. This very important resource allows us to engage in regular contact with the Borough's existing Gypsy & Traveller communities in order to inform an assessment of current and future need.
- 5.2 Our Gypsy & Traveller Liaison Officer has produced a family generation trajectory of the existing families at the Greenlands, Cox Lane site. This key piece of evidence helps us to identify the scale of our need for new pitches over the course of the plan period and provides a timeframe for when this need is likely to materialise. A parallel exercise has been carried out for the Conifer Park, Kiln Lane site in consultation with Surrey County Council's site manager.
- 5.3 By using this approach in combination with our desktop review, we believe that we have produced a more accurate and proportionate overview of need. Critically, it takes account of the specific local circumstances of our Gypsy and Traveller community. This approach is also less intrusive and helps to overcome the issue of consultation fatigue as discussed above.

Greenlands, Cox Lane

- 5.4 The Greenlands, Cox Lane site comprises 16 pitches. A family generation trajectory based on the current occupants of the site is detailed in Table 9 below.

Table 9: Family Generation Trajectory for Greenlands, Cox Lane site

Pitch	Current Occupants	Future Pitch Requirements Years 1-5	Future Pitch Requirements Years 6-10	Future Pitch Requirements Years 11-15
1	3 – 2 tenants, 1 child	1	0	0
2	2 – both tenants	0	0	0
3	3 – 2 tenants, 1 child	0	0	0
4	4 – 2 tenants, 2 children	0	1	0
5	2 – 2 tenants	0	0	0
6	3 – 2 tenants 1 son	1	0	0
7	4- 2 tenants, 2 children	1	0	1
8	2 – both tenants	0	0	0
9	4 – 2 tenants, 1 child, 1 child-in-law,	1	0	0
10	4 – 2 tenants, 2 children	0	0	2
11	2 – tenant ,1 child	0	0	0
12	5 – 2 tenants, 3 children	0	2	1
13	4 – 2 tenants, 1 child 1 child- in-law	1	0	0
14	5 – 2 tenants, 3 children	2	1	0
15	2 – both tenants	0	0	0
16	6 – 2 tenants, 4 children	0	3	0
		7	7	4

- 5.5 As illustrated by Table 9, the Greenlands, Cox Lane site is fully occupied and there are instances of doubling up on certain pitches. The projected family formation rate at the site is based on the age of

the occupants and their children. Occupants⁴ are considered to have a potential pitch need once they reach 18 years old. This projection, combined with the doubled up families, illustrates that there is an immediate need for up to 7 pitches within the next 5 years, and an additional need for 7 pitches in years 6-10 and a further 4 pitches in years 11-15 respectively, giving a total need of 18 new pitches to accommodate the current population and expected growth of the families at this site over a 15 year period.

Conifer Park, Kiln Lane

- 5.6 The situation at the Conifer Park, Kiln Lane site is more complex. The site originally comprised 14 pitches. Circumstances led to the site being reconfigured by the County Council and it now only comprises 7 pitches. The site has not got smaller but the pitches have got larger.

Table 10: Family Generation Trajectory for Conifer Park, Kiln Lane site

Pitch	Current Occupants	Future Pitch Requirements Years 1-5	Future Pitch Requirements Years 6-10	Future Pitch Requirements Years 11-15
1	1 tenant (1)	0	0	0
2	1 tenant (1)	0	0	0
3	1 tenant, 3 adult sons (4). 1 on waiting list	2	0	0
4	1 tenant plus non-family member (1) 1 on waiting list	0	0	0
7	1 tenant plus 3 children (4) (3 on waiting list)	0	0	0
9	1 tenant (a couple) plus 3 children (4)	0	1	1
14	1 tenant (1)	0	0	0
Total		2 (plus 5 on waiting list)	1	1

- 5.7 As illustrated in Table 10, as the site is now configured, there is no available plot provision at the Conifer Park, Kiln Lane site in terms of vacant pitches. Some of the families currently living at the site occupy large pitches (previously we would have called these double pitches)

⁴ There is no evidence to suggest that this is a gender specific issue – so the TAA assumes applies to male and female occupants.

which can potentially accommodate growth within the family. The fourteen pitches previously on the site were considered to be small by current standards. On that basis a site comprised of 9 pitches might be considered a more realistic proposition. Therefore the capacity on the site, within the reconfigured larger pitches is considered to be 2 additional pitches. The need figure arising from family formations at this site is 9 pitches. 7 in years 1-5, 1 in years 6-10 and 1 in years 11-15.

- 5.8 Management issues at the site mean that it is unlikely that any of the spare capacity currently available at the Conifer Park, Kiln Lane site could be used to accommodate either the currently doubled-up families at the Greenlands, Cox Lane site or new family formations from that site. The communities at the two sites are distinct and unlikely to welcome any attempt to bring other unknown families onto their sites.
- 5.9 The Borough occupies a unique position in Surrey, in that all of its Gypsy & Traveller communities are accommodated on its public sites, with no private site provision. This situation is unlikely to change due to land supply constraints. The high land values in the Borough, its densely populated urban area and its open land areas designated as either Green Belt or Strategic Open Space all contribute to a lack of supply of appropriate private sites. This position is supported by historic trend evidence and by the absence of any private sites being promoted through the current Site Allocations process and recent Call-for Sites exercise. On that basis it can be reasonably assumed that the demand for new pitches will primarily be generated by the populations on its existing public sites. Consequently it can be concluded that our need is for public pitch provision.
- 5.10 A site located at The Roveries, Cox Lane has been used by Travelling Showpeople. Our intelligence suggests that the Travelling Showpeople who reside on this site have now retired from the business – although machinery and equipment continue to be stored on-site.. On that basis it is assumed that there is no need to formulate a family generation trajectory for this site. There are not thought to be any other Travelling Showpeople residing in the Borough.

6. Stage Three: Assessment of Accommodation Need

- 6.1 This chapter presents the calculation of accommodation needs assessment for travellers over a fifteen year period. For the initial five year period 2017-2022, the assessment is based on the data from our desktop review and our family generation trajectories from our two public sites.
- 6.2 In line with the Surrey Methodology, the model for calculating the need for the first five years is based on a step-by-step process as follows. These steps are set out in totality under Table 11.

Existing Supply

A. Current supply of occupied Local Authority site pitches/plots

- 6.3 There are two local authority sites in the borough, Greenlands, Cox Lane and Conifer Park, Kiln Lane. These have a total combined capacity of 23 pitches. Currently, all of these pitches are occupied (see table 10 and associated text).

Row A	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
23	0

B. Current supply of authorised and occupied privately owned pitches/plots

- 6.4 There are currently no authorised and occupied privately owned pitches in the Borough but there are four Travelling Showpeople plots at The Roveries site.

Row B	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	4

C. Unauthorised pitches/plots tolerated for more than 10 years

- 6.5 This figure is based on the assumption that if no action has been taken against an unauthorised development or encampment for more than 10 years, the site would become lawful and therefore should count against permanent site provision. There are no current unauthorised pitches or plots in the Borough.

Row C	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

Projected Supply

D. Number of unused/vacant local authority pitches/plots

- 6.6 There are currently no vacant pitches at either site.

Row D	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

E. Number of unused/vacant authorised privately owned pitches/plots

- 6.7 There are currently no unused or vacant private Gypsy & Traveller pitches.

Row E	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

F. Number of existing pitches/plots expected to become vacant in the near future

- 6.8 From our desktop review and our family generation trajectories, it is anticipated that no local authority pitches will become vacant within the next five years. A net gain of pitches would likely only occur if another public site became available in an adjoining local authority and the families currently doubled up on the Greenlands, Cox Lane site moved out of the area. Otherwise pitches would only become available if existing residents moved into bricks and mortar accommodation, although either of these scenarios are impossible to predict with any certainty.
- 6.9 Levels of migration into and out of an area are impossible to predict with any degree of confidence. Potentially, Gypsies & Travellers could move into the Borough from any area of the country, although migration amongst the community is often driven by specific causes such as familial relationships or economic factors.
- 6.10 Research into other authorities' TAAs indicates that there is no satisfactory way of measuring and assessing need from in-migration. This is because even long-term trend data is not considered a robust source of information due to the low level and erratic nature of migration amongst the Gypsy & Traveller community. We have assumed that in-migration will primarily come from Travellers with a familial connection to our existing community. Based on past trends this will be limited, part due to the lack of availability of sites.

- 6.11 The assessment process for new tenancy applications for the Borough's two local authority sites uses a number of criteria including need, links to the area and other personal and relevant circumstances. On the basis of our evidence we believe that the turnover of pitches at these sites is likely to be extremely low over a five year period and consequently a zero is recorded under row F.

Row F	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

G. Number of households in site plot/pitch accommodation expressing a desire to live in bricks and mortar housing (in next five years)

- 6.12 Information from our Housing Needs Register and evidence from the Gypsy & Traveller Liaison Officer indicates that there is currently only one household living in on-site pitch accommodation expressing a desire to live in bricks and mortar accommodation in the next five years.

Row G	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
1	0

H. New local authority pitches/plots planned during years 1-5

- 6.13 There are no new local authority pitches or plots planned.

Row H	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

I. Existing applications for private pitches/plots (including unauthorised sites) likely to gain planning permission during years 1-5

- 6.14 There are no current planning applications for private pitch provision in the Borough and no current unauthorised sites. The desktop review indicates that there is little likelihood of any applications for private pitch provision being received in the next five years.

Row I	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

Existing Need

J. Households seeking permanent site accommodation in the area

- 6.15 This section draws upon data from households on waiting lists, namely the Borough Council's Housing Needs Register and the County Council's Traveller Site Waiting List. It takes account of households living in unsuitable bricks and mortar accommodation expressing a desire to live in on-site accommodation.
- 6.16 Our evidence demonstrates that there are two families on the Council's Housing Needs Register who live on sites or have a connection to a site. Of the 45 people on the Surrey County Council Traveller Site Waiting List, ten have specifically requested a pitch on the Conifer Park, Kiln Lane site. One of these is resident on Kiln Lane on a pitch that is not over-crowded so is not considered to have a need. Another has requested to remain on the waiting list but to not be considered for a pitch indefinitely so has not been included. To the best of our knowledge, five people on the Waiting List already live on the Kiln Lane Site on potentially overcrowded pitches or where new family formations will make the pitch overcrowded within the next 15 years. These have not been double counted and are included here.
- 6.17 No intelligence is available to indicate if there are any households in the Borough who have a desire to move to on-site accommodation. It is assumed that if there was anyone they would have registered on the waiting List.

Row J	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
8	0

K. Households on unauthorised encampments expressing a need to reside in the borough

- 6.18 Unauthorised encampments are defined as pitches/plots not owned by the residents. At the time of writing, no unauthorised encampments have been identified in the Borough. There have been two instances of unauthorised encampments over the last five years, although these only lasted a very short period of time before they were moved on. The caravan count data and local authority records provided for the desktop review indicate that the level of unauthorised encampments has been very low in recent years and therefore a zero is recorded at Row K.

Row K	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

L. Households on unauthorised developments for which planning permission is not expected

- 6.19 Unauthorised developments are defined as pitches/plots owned by the residents but without the benefit of planning permission (excluding sites that have been tolerated for more than 10 years). Since these sites are, by definition, unauthorised and not expected to gain authorisation through planning permission, these households are assumed to be in need of authorised pitch provision. For the purpose of the Assessment their need could be met either through the granting of planning permission (for the unauthorised site), provision elsewhere, or through other options such as bricks & mortar accommodation.
- 6.20 There are currently no unauthorised developments in the borough and a zero is therefore recorded at Row L.

Row L	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

M. Need arising from overcrowded pitches/plots and concealed households

- 6.21 Overcrowding of a pitch/plot by one large household with insufficient space for a further caravan is an important indicator of need. The Surrey Methodology states that overcrowding can be defined by the “bedroom standard” criterion – one bedroom to each couple or lone parent, one to each pair of children under 10 years, one to each pair of children of the same sex over 10 years, one bedroom for individual children over 10 years of different sex and for adults⁵.
- 6.22 Our family generation trajectories demonstrate that there are currently three households on overcrowded or doubled up pitches on the Greenlands, Cox Lane site. Of these, one of the doubled up households is not able to live independently and has therefore been discounted from our need figure.
- 6.23 Our family generation trajectories demonstrate that there is currently one household doubled up on the Kiln Lane site. This household is on the waiting list and included within the 8 in Row J.
- 6.24 Concealed households are defined as adults aged 18 years or over still living with parents who would be likely to want to form a separate household. Within the Traveller community there is a strong tradition of children seeking independent accommodation close to their family,

⁵ This is taken from 2010 DCLG guidelines on estimating housing need.

preferably on the same site. However, it is often difficult for children to secure accommodation close to their family, which results either in them moving away or in overcrowding on existing pitches/plots.

6.25 Our family generation trajectories identify three concealed households on the Greenlands, Cox Lane site. Two families on the Conifer Park, Kiln Lane site are identified as concealed (this excludes 4 who are also on waiting list).

6.26 The current situation at the Kiln Lane site, with some families occupying the equivalent of double pitches, means that there is considered to be some space on this site to accommodate the families currently living there- the 'doubled up' families and concealed households. The Kiln Lane site is approximately 4600m²- including site access road and shared facilities. This equates to an average pitch size of 650m² with 7 pitches. It is considered that the site is capable of accommodating at least 9 pitches based on the size of pitches at Cox Lane (470m² average). It is therefore assumed that the two concealed households on the Kiln Lane site do not produce a need for additional pitches and the capacity within the site boundaries can accommodate these two concealed households. Therefore, the final figure for Row M is given as 5. This is comprised of:

- 2x doubled up pitches at Cox Lane
- 3x concealed households at Cox Lane
- 2x concealed households at Kiln Lane
- -2 for the capacity at Kiln Lane

Row M	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
5	0

N. Temporary planning permissions due to expire before 2018

6.27 Temporary planning permissions, once they expire, will represent a new need. Temporary permissions are often granted on sites where there is a policy objection in principle, but due to the need to provide more pitches/plots a temporary permission is granted. This approach is often applied to enable the local authority to provide pitches/plots in more suitable locations prior to the expiry of the permission.

6.28 There are no temporary planning permissions for traveller accommodation currently extant in the Borough.

Row N	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
0	0

O. New family formations expected to arise from existing borough households 2013-2018

- 6.29 Our family generation trajectories helped us to identify households where new pitch provision would be required within the next five years and beyond, based on the age profile of the families living there. These trajectories identified a need figure of 13 pitches due to family growth at the Greenlands, Cox Lane site in the next 15 years to 2032. There is a need for two pitches in the first five years. The families living at the Conifer Park, Kiln Lane site currently have a need figure of two pitches due to family growth in the next fifteen years (but no need in the next five years).
- 6.30 These figures are in addition to the new family formations as a result of concealed households or overcrowded pitches and are based on children reaching the age of 18 within that five year period.

Row O	
Pitches (Gypsies & Travellers)	Plots (Travelling Showpeople)
2	0

- 6.31 A summary of the various figures identified in Rows A to O is set out under Table 11 below. A needs figure for the next 15 years is in table 12. This is then divided into the relevant type of pitch requirement in Stage Four.

Table 11: Summary of Current Supply and Demand

	Pitches (Gypsies & Travellers- without applying the new definition)	Plots (Travelling Showpeople)
Current Residential Supply:		
A. Current supply of occupied Local Authority site pitches/plots	23	0
B. Current supply of authorised and occupied privately owned pitches/plots	0	4
C. Unauthorised pitches/plots tolerated for more than 10 years	0	0
Total Households	23	4
Projected Supply:		
D. Number of unused/vacant local authority pitches/plots	0	0
E. Number of unused/vacant authorised privately owned pitches/plots	0	0
F. Number of existing pitches/plots expected to become vacant in the near future	0	0
G. Number of households in site plot/pitch accommodation expressing a desire to live in bricks and mortar housing (in next five years)	1	0
H. New local authority pitches/plots planned during years 1-5	0	0
I. Existing applications for private pitches/plots (including unauthorised sites) likely to gain planning permission during years 1-5	0	0
Total Pitch Capacity	1	0
Current backlog of need:		
J. Households seeking permanent site accommodation in the area	8	0
K. Households on unauthorised encampments expressing a need to reside in the borough	0	0
L. Households on unauthorised developments for which planning permission is not expected	0	0
M. Need arising from overcrowded pitches/plots and concealed households	5	0
N. Temporary planning permissions due to expire before 2018	0	0
Current Shortfall	13	0
Future Need:		
O. New family formations expected to arise from existing borough households 2013-2018	2	0
Total Current Residential Demand for Pitches/Plots⁶	15	0
Demand for Extra Pitches/Plots 2013-2018⁷	14	0

⁶ Total current residential demand for pitches/plots = Current shortfall + newly arising need/family formation

⁷ Demand for extra pitches = Total current residential demand – Total current supply

Accommodation Need 2017-2032

- 6.32 Government policy contained in *Planning Policy for Traveller Sites* states that local authorities should identify a supply of specific developable sites or broad locations for development for years six to ten and, where possible, for years 11-15. It is acknowledged that the need figure for these years is difficult to forecast accurately.
- 6.33 The Surrey Methodology calculates the need for this 10 year period by taking a baseline figure from the initial 5 year calculation and extrapolating this by using a family formation rate of 3% for Gypsy & Traveller families and 1.5% for Travelling Showpeople households. These percentage figures are applied as compound growth per annum and were agreed by Traveller representatives for Surrey during the preparation of previous Gypsy & Traveller Accommodation Assessments (GTAAs).
- 6.34 Due to the Borough's unique position in Surrey of having no private Gypsy & Traveller sites and having a Gypsy & Traveller Liaison Officer, we are able to derive a more accurate figure of need over years 5-15 by using our Family Generation Trajectories developed in Section Two of this assessment. From these trajectories, it is anticipated that there will be a need for a further eight pitches in years 6-10 and another five pitches in years 11-15.
- 6.35 As our calculation in Table 11 shows, there is no current demand or need for Travelling Showpeople accommodation in the borough. We anticipate that this is unlikely to change and consequentially there is not thought to be any additional need for Travelling Showpeople accommodation in years 5-15. None of the unauthorised encampments in the last two years have been by Travelling Show people.
- 6.36 There are other constraints affecting the accurate prediction of longer term need for new pitches/plots. The current shortage of sites and pitches/plots for Travellers nationally means that it is difficult to predict trends in living arrangements until the current lack of pitch based accommodation has been addressed at a national level. We have no evidence that the rise in illegal encampments over the last few years is linked to the overcrowding on our current public sites. It is more likely that these are actually due to the regional/ national problem of a lack of transit sites. Equally it is impossible to predict how Travellers will decide to live in the next decade. There may be an increase in smaller households, moves into bricks and mortar housing may be more common or household formation may happen at a later age.

Summary of Identified Need 2017-2032

- 6.36 Taking into account the calculations above for the period between 2017 and 2032 and the information from our Family Generation Trajectories, we can identify a total need for 27 'pitches' over the 15 year period between 2017 and 2032. This equates to an annualised requirement of 1.9 pitches per year. There is no identified need for additional Travelling Showpeople plots over the same period.

Table 12: Summary of identified need 2017-2032

	Pitches (without applying the new definition)	Travelling Showpeople Plots
Current Authorised Residential Provision (pitches/plots)	23	4
Residential Need 2017-2022	14	0
Residential Need 2022-2027	8	0
Residential Need 2027-2032	5	0
Annualised Requirement (2017-2032)	1.8	0
Total pitch requirement	27	0

- 6.37 In light of the change in planning definition, a fourth stage has been added to determine which category the pitch need falls under;

1. Gypsies and Travellers meeting the new planning definition including those who may have ceased to travel temporarily under the new definition
2. Households who may meet the planning definition but this has not been verified
3. Non Travelling Gypsies and Travellers (households residing in caravans but that do not travel or have ceased to travel permanently)

- 6.38 It has been challenging to determine the status of the households requiring caravan pitches now and in the future in Epsom & Ewell. In order to inform this process a brief survey was prepared and each pitch on Cox Lane was visited by our Gypsy Liaison Officer over a number of weeks. Unfortunately only six of the 16 pitches responded to the survey. This is a 37.5% response rate from the site. Each of the surveys completed did indicate that the Households either have never travelled or have permanently ceased to travel. No surveys were completed at the Kiln lane Site. The Information provided by applicants on the Pitch Waiting List provided by Surrey County Council was also helpful in determining the nomadic habits of some applicants. It was noted that one applicant stated they only travel within the Borough for

non-work purposes and another stated he would never leave the Kiln Lane site.

- 6.39 From the evidence gathered it has been determined that under the new planning definition we cannot identify any 'Gypsy or Travellers' requiring a pitch in the Borough at this time. We have determined that 18 of the households do not travel and 12 of the households are unknown (in totality). This is reduced to 18 and 9 (net) where the site capacity is included. This information is summarised below:

Table 13: Pitch need summarised

	Year		
Gross Figures	1-5	6-10	11-15
1. Gypsies and Travellers meeting the new planning definition including those who may have ceased to travel temporarily under the new definition	0	0	0
2. Households who may meet the planning definition but this has not been verified	7 (4 net)	2	3
3. Non Travelling Gypsies and Travellers (households residing in caravans but that do not travel or have ceased to travel permanently)	10	6	2

- 6.40 Although the need calculation under the planning definition has been determined as zero, the Borough still has a responsibility to consider their housing needs somewhere within the Plan Making Process. The Equality Act 2010 defines Romany Gypsies and Irish Travellers as ethnic groups, meaning they are legally protected against race discrimination. An ethnic group is one with a shared history and cultural traditions. These traditions should not be ignored. The needs of those residing in caravans will differ from the rest of the population because of their preference for caravan dwelling. Therefore a pitch for a caravan is their housing requirement.
- 6.41 In addition provisions set out in the Housing Act 1985 include a duty for Local Authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed. The implication is therefore that the housing needs of any Gypsy Traveller or Travelling Showperson households who do not meet the planning definition will need to be assessed as part of the wider housing needs of the Borough through the Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) feeding into the Site Allocations process. They will form a subset of the wider need arising from 'households residing in caravans'.

Transit Sites

- 6.42 Guidance contained within *Planning policy for traveller sites* states that local planning authorities should assess the likely transit accommodation needs of their areas and set pitch and plot targets that address the transit site accommodation needs of travellers.
- 6.43 A transit site is intended for short term use by Gypsies & Travellers en route to another destination and requiring a stopping place. It is usually a permanent site, but with a maximum period of stay imposed so that its residents are not permanent.
- 6.44 Although nomadism and travelling are currently restricted to a certain extent⁸, this remains an important feature of Gypsy & Traveller identity and way of life. Gypsies & Travellers often visit fairs and other family members. Equally some may not have a permanent base and remain mobile, especially during the summer months.
- 6.45 Permanent transit sites can potentially allow local authorities to respond more robustly to illegal encampments. They also reduces the impact of the nomadic lifestyle on local residents and businesses; reduces long-term costs to local authorities arising from unauthorised encampments; enables the wider use of legal powers, for example under the Anti-social Behaviour Act, and provides a legal, safe and practical place for Gypsies & Travellers to stop.
- 6.46 One of the main attractors for Travellers from outside the Borough is the Epsom Derby Festival held in early June. We provide accommodation for up to 230 caravans for a temporary period to cater for this event. There are no permanent transit sites in the Borough, and our data indicates that there is no need for a transit site. As outlined in Section One of the Assessment, there have only been two unauthorised encampments in the last five years, and both of these were resolved within a short period of time. The Borough is also small geographically and is not situated on a major transport route and so is unlikely to provide accessible transit accommodation for Gypsies and Travellers en-route to another destination.
- 6.47 The Partial Review of Gypsy & Traveller Site Accommodation in the South East incorporated an assessment of the need for further transit provision. The South East of England Partnership Board (SEEPB) commissioned Pat Niner of the Centre for Urban and Regional Studies at the University of Birmingham to undertake this assessment. This

⁸ Freedom of movement of the Traveller community is restricted by limitations on the number of authorised available sites in the country, and the measures often taken against unauthorised sites mean that it is not always possible for Travellers to maintain a traditional nomadic lifestyle.

identified a total of 109 transit pitches being provided across the South East region, with Surrey providing 57 of these.

- 6.48 Transit provision in Surrey currently consists of two sites, one in Waverley and the other in Spelthorne. The New Acres site in Waverley did provide 35 transit pitches; however, the site received planning permission in 2012 to accommodate 35 permanent pitches and 15 transit pitches. The site known as Ponderossa in Spelthorne accommodates 15 transit pitches.
- 6.49 The Pat Niner study recommended that there should be one additional transit site provided in Surrey with provision for four pitches. No recommendation was made as to the geographic location of the additional site. Work on the Partial Review was discontinued following the revocation of the South East Plan and consequently no target for transit provision was ever set.
- 6.50 The Assessment has not identified any evidence of need for additional transit provision within the Borough. On that basis it is assumed that additional provision would only be required if the level of travelling and subsequent unauthorised encampments were to increase markedly. There are scenarios in which this could occur, for example if Travellers were evicted from a large-scale illegal site elsewhere in the country and decided to seek accommodation in the Borough and wider area. This eventuality is unlikely to occur but fluctuations in the level of travelling remain inherently unpredictable. This underlines the importance of keeping an up-to-date evidence base through regular monitoring of incidences of unauthorised encampments and reviewing and reassessing provision where appropriate.
- 6.51 The Surrey Methodology states that continuing joint working between the Surrey boroughs and districts, together with other neighbouring local authorities, will continue to address the issue of transit sites where necessary. These discussions are likely to be ongoing due to the different stages of completion of TAAs across the County and elsewhere.
- 6.52 Due to the Borough's location and size it is not considered necessary to plan for further transit site accommodation beyond that provided for the Epsom Derby Festival. If further transit accommodation in Surrey is considered it should be provided in more accessible and appropriate locations closer to major transport routes.

7. Constraints

- 7.1 Due to the nature of need for new 'Caravan Dweller' accommodation it is estimated that at least one new public site will be required. There are several constraints to the delivery of new public sites in the borough.

Land Supply Constraints

- 7.2 The Borough's geographic size and the density of its existing urban area mean that, as with other land uses, the availability of land for new Gypsy & Traveller pitches is highly constrained.
- 7.3 Approximately 42% of the Borough is covered by Metropolitan Green Belt. National planning policy states that Gypsy and Traveller accommodation is not an appropriate use for Green Belt land, which further restricts the supply of potential new sites. Consequently, if we were to consider site allocation options located within the Green Belt, their delivery would be predicated on their release. Before this could happen we would need to wait for the outputs from a Strategic Green Belt Review.
- 7.4 In our existing urban areas land values are very high. The greatest demand is for open market housing and commercial uses. As a consequence it may prove uneconomical for either the Council, or the Gypsy & Traveller community to purchase and redevelop land as accommodation. Our evidence shows that historically there have not been any private Gypsy & Traveller sites in the Borough and this is likely to continue. Consequently, it is reasonable to assume that the most deliverable sites will be those in public ownership – such as those owned by the Borough and County Councils.
- 7.5 It is also important to note that Gypsy & Traveller pitches need to be relatively open and cannot be developed to the same densities that bricks and mortar houses can be. This means that Gypsy & Traveller pitches require a larger site area than the equivalent number of new houses⁹.

⁹ Government guidance on pitch size states that *an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area* (DCLG, 2008).

Financial Constraints

- 7.6 Identifying sufficient sources of funding to deliver new public Gypsy & Traveller sites in the Borough is considered to be a major obstacle. Our evidence suggests that a single new pitch can cost at least £120,000¹⁰. Previously local authorities have been able to apply for grant funding from central government. However, the level of funding from this source has gone; at a time when land values and construction costs continue to rise.
- 7.7 In order to address this issue the government has indicated that they expect social housing providers to step-in and fill this funding shortfall. Unfortunately, most social housing providers have little experience in delivering Gypsy & Traveller accommodation and may not be in a position to meet the Borough's need in a timely fashion.

Planning Policy Constraints

- 7.8 *Planning policy for Traveller sites* advises local planning authorities that in addition to identifying a supply of future Gypsy & Traveller sites, they should also prepare development management policies that set out criteria to determine planning applications for new as yet unidentified sites.
- 7.9 We have adopted Development Management Policy DM23 Gypsy & Traveller Sites. This policy sets criteria to be considered in the provision of new sites, including access to local services, transport infrastructure, flood risk, the erection of structures and compatibility with existing neighbouring residential uses. The policy also outlines that the Site Allocations Policies Document will identify and allocate suitable sites. Any new sites that are identified by the Council will therefore have to satisfy the criteria contained within Development Management Policy DM23.

¹⁰ This estimate includes the purchase costs of land, and the provision of water and electricity which may cost more or less depending upon the location of the site.

8. Conclusions

- 8.1 The Borough Council has conducted a thorough review of its Traveller Accommodation Assessment, which takes into full account the changes introduced by “Planning Policy for Travellers” (August 2015). The outputs from the Assessment will provide a sound evidence basis to inform the preparation of any necessary new policies to be included in the Partial Review of the Epsom & Ewell Core Strategy.
- 8.2 The Assessment has successfully expanded the Borough Council’s methodology for assessing local need. In particular, intelligence gained from the Borough Council’s Gypsy & Traveller Liaison Officer has helped to identify a more accurate projection of need. It has also sought to incorporate additional sources of data to provide an accurate projection of accommodation need as required by national planning policy.
- 8.3 From the evidence gathered it has been determined that, under the revised planning definition, there is no identified need for new additional traveller pitches. On that basis the Assessment concludes that there is no current requirement for the Epsom & Ewell Local Plan to include a target for future pitch provision.
- 8.4 Although the need for new additional Traveller accommodation is nil, we still have a responsibility to account for the resulting need elsewhere in the Local Plan process. It is suggested that the most appropriate way of addressing this need is as a form of specialised housing provision – similar to how student and elderly person close-care accommodation is already addressed by the Local Plan.
- 8.5 Our evidence identifies that there is a need for 27 new caravan pitches, to meet the accommodation needs of members of the Traveller community who no longer lead a nomadic lifestyle (or this is unknown), over the fifteen year period. This equates to an annualised requirement of 1.9 new caravan pitches per year. However, as with other forms of specialised housing accommodation it is possible that this need could go unmet.
- 8.6 There is no evidence of demand for additional new accommodation for Travelling Showpeople during the fifteen year period. There is also no evidence of need for a permanent new transit site within the Borough. Due to its small size and location within the strategic highway network, the Borough is not considered an appropriate location for such provision.
- 8.7 The Assessment notes that the revisions to national planning policy may usher in wider changes to Traveller accommodation planning. For example there may be an increase in smaller households, moves into

bricks and mortar housing may be more common or household formation may happen at a later age. The Assessment recommends that the Borough Council continues to monitor the five year supply of sites through the Annual Monitoring Report and manage provision accordingly.

- 8.8 On that basis this study should be regarded as a reasonable and robust assessment of need upon which to base planning decisions going forward. We have undertaken a thorough assessment of the need arising from all sites (local authority, permanent, temporary and unauthorised) present at the time of the study. It is recommended that an assessment of accommodation need is repeated every 5 years.