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Milton Keynes Council

Gypsy and Traveller Accommodation Assessment

Final Report

November 2021



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Executive Summary

Introduction and Methodology

- The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Milton Keynes Council (the Council) area.
- As well as updating previous GTAAs, the GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2021 to 2040 to cover the Milton Keynes Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of any previous GTAAs for Milton Keynes Council.
- The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in Milton Keynes through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.
- A total of 18 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Milton Keynes. No interviews were completed with Travelling Showpeople. In addition, a total of 3 interviews were completed with households living in bricks and mortar. A total of 7 stakeholder interviews were also completed.
- The fieldwork for the study was completed between July 2021 and September 2021, and the baseline date for the study is September 2021.

Key Findings

Pitch Needs – Gypsies and Travellers

- Overall, the pitch needs for Gypsies and Travellers for the period 2021-2040 are set out below. Needs are set out for those households that met the planning definition of a Gypsy or Traveller; for any undetermined households¹ where an interview was not able to be completed due to households not being present despite up to three visits to each site who may meet the planning definition; and for those households that did not meet the planning definition although this is no longer a requirement for a GTAA.
- Only the need from those households who met the planning definition and from those from undetermined households who subsequently demonstrate that they meet it should be formally considered as need arising from the GTAA. The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate.

¹See Paragraph 3.28 for further information on undetermined households.

- The Council will need to carefully consider how to address any need associated with undetermined Travellers as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.
- In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies. This approach is specifically referenced in the revised National Planning Policy Framework (July 2021). Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 62 then states that [emphasis added] 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'
- The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Milton Keynes due to data protection issues, the Council have more detailed data to support the preparation of any future Local Plan Policies.
- There were 8 Gypsy or Traveller households identified in Milton Keynes that met the planning definition and 27 households that did not meet the planning definition. There were no undetermined households that may meet the planning definition.
- There is a need for **9 pitches for households that met the planning definition**. This is made up of 3 from concealed or doubled-up households or single adults; **1** from teenage children; and 5 from new household formation², derived from the household demographics.
- 1.13 There is a no need for undetermined households.
- Whilst not now a requirement to include in a GTAA, there is a need for 20 pitches for households that did not meet the planning definition. This is made up of 4 concealed or doubled-up households or single adults; 3 from bricks and mortar accommodation; 5 from teenage children; 1 from in-migration/roadside; and 7 from new household formation, using a rate of 1.70% derived from the household demographics.
- Figure 1 summarises the identified need and Figure 2 breaks this down by 5-year periods.

² See Chapter 7 for further information on new household formation.

Figure 1 - Need for Gypsy and Traveller households in Milton Keynes (2021-40)

Status	2021-2040
Meet Planning Definition	9
Undetermined	0
Do not meet Planning Definition	20

Figure 2 - Need for Gypsy and Traveller households in Milton Keynes that met the Planning Definition by year periods

Voore	0-5	6-10	11-15	16-20	Total
Years	2021-25	2026-30	2031-35	2036-40	Total
	4	2	2	1	9

Plot Needs - Travelling Showpeople

- Overall, the plot needs for Travelling Showpeople from 2021-2040 are set out below. Needs are set out for those households that met the planning definition of a Travelling Showperson; for those undetermined households where an interview was not able to be completed who may meet the planning definition; and for those households that did not meet the planning definition (although this is no longer a requirement for a GTAA).
- Only the need from those households who met the planning definition and from those of the undetermined households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- The need arising from households that met the planning definition should be addressed through yard allocation/intensification/expansion in Local Plan Policies.
- The Council will need to carefully consider how to address any need associated with any undetermined Travelling Showpeople as it is unlikely that all of this need will have to be addressed through the provision of conditioned Travelling Showpeople plots.
- Any need for households who did not meet the planning definition will need to be considered as part of general housing need. See Paragraphs 1.10-1.13 for further details.
- There are no Travelling Showperson's yards identified in Milton Keynes so there is **no current or future need for plots**.

Figure 3 - Need for Travelling Showpeople households in Milton Keynes (2021-2040)

Status	2021-40
Meet Planning Definition	0
Undetermined	0
Do not meet Planning Definition	0

Figure 4 – Need for Travelling Showpeople households in Milton Keynes that meet the Planning Definition by year periods

Voors	0-5	6-10	11-15	16-20	Total
Years	2021-25	2026-30	2031-35	2036-40	TOTAL
	0	0	0	0	0

Transit Recommendations

- Due to historic low numbers of short-term unauthorised encampments, it is not recommended that there is a need for a formal public transit site in Milton Keynes at this time.
- The situation relating to levels of short-term unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements should continue to be considered.
- The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between a Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- Temporary stopping places can also be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to consider providing basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

2. Introduction

- The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Milton Keynes. The outcomes of the study will supersede the outcomes of the previous Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment completed in Milton Keynes.
- The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act (2016), the revised National Planning Policy Framework (NPPF) 2021, and the revised Planning Practice Guidance (PPG) 2021.
- The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of Local Plan Policies and the provision of Traveller pitches and plots covering the period 2021 to 2040 to meet the Local Plan period and the 15-year requirements of the PPTS. As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- The baseline date for the study is September 2021 which was when the household interviews were completed.

Definitions

The planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2015)

For the purposes of the planning system, the definition was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

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.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

The key change that was made to both definitions was the removal of the term "persons...who have ceased to travel permanently", meaning that those who have ceased to travel permanently will no longer fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- One of the most important questions that GTAAs need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested, among other things, the meaning of the term 'nomadic'.
- 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.
- In 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.
- ^{2.12} 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*.
- ^{2.13} 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 their elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought a 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.
- 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 local employment.

- 2.15 Wrexham County Borough Council v National Assembly of Wales and Others (2003) determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- The implication of these rulings in terms of applying the planning definition is that it will **only** include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work such as holidays and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- 2.17 It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependants with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled for work in the past. In addition, households will also have to demonstrate that they plan to travel again for work in the future.
- This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

This was further reinforced in a Decision Notice for an appeal in Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander or travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

- Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
 - » The Housing Act, 1985
 - » Planning Policy for Traveller Sites (PPTS), 2015
 - » The Housing and Planning Act, 2016
 - » National Planning Policy Framework (NPPF), 2021
 - » Planning Practice Guidance³ (PPG), 2021
- ^{2.22} In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews, need to be taken into consideration. Relevant examples have been included in this report.
- The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2015). It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition, the Housing and Planning Act makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2015

- ^{2.24} PPTS (2015), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):
 - » 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.

³ With particular reference to the sections on *Housing needs of different groups* (May 2021).

- » 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.
- ^{2.25} In practice, the document states that (PPTS Paragraph 9):
 - » Local planning authorities should set pitch targets for Gypsies and Travellers 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.
- PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:
 - » Identify and annually update 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 6-10 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 Dutyto-Cooperate on strategic 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.
- Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS 2015 also notes in Paragraph 11 that:
 - » 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, while respecting the interests of the settled community.

Revised National Planning Policy Framework (NPPF) 2021

- The most recent version of the revised National Planning Policy Framework was issued in July 2021. Paragraph 61 of the revised NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.
- Paragraph 62 then states that [emphasis added] 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'
- ^{2.30} This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.
- ^{2.31} In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (APP/P0240/C/18/3213822) the Inspector concluded in relation to the then Paragraph 61 (now Paragraph 62) of the NPPF that:

It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging LP. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs.

Planning for the Future White Paper (2020)

In August 2020 the Government published a White Paper on proposals to reform the current planning system in England. The consultation period on the White Paper ended on 29th October 2020. Whilst the White Paper did not make any references to planning for Gypsies and Travellers, the Council may need to consider the outcomes of the consultation and any subsequent changes to planning legislation in England that relate to Gypsies and Travellers.

3. Methodology

Background

- Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of changes to PPTS in August 2015, the Housing and Planning Act (2016) the revised NPPF (2021), and the revised PPG (2021). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- PPTS (2015) contains a number of requirements for local authorities which must be addressed in any GTAA methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- ORS would note that since the changes to the PPTS in August 2015 the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Cambridge, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded:
 - '...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'
- The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:
 - 'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'
- The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Glossary of Terms/Acronyms

A Glossary of Terms/Acronyms can be found in **Appendix A**.

Desk-Based Review

- ORS collated a range of secondary data that was used to support the study. This included:
 - » Census data.
 - » Traveller Caravan Count data.
 - » Records of unauthorised sites/encampments.
 - » Information on planning applications/appeals.
 - » Information on enforcement actions.
 - » Existing Needs Assessments and other relevant local studies.
 - » Existing national and local policy, guidance, and best practice.

Stakeholder Engagement

Engagement was undertaken with key Council Officers from Milton Keynes through email and telephone interviews. A total of 2 interviews were completed with Council Officers from the study area.

Working Collaboratively with Neighbouring Planning Authorities

- To help support the Duty-to-Cooperate and provide background information for the study, email and telephone interviews were conducted with Planning Officers in neighbouring planning authorities. These interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Councils set out below.
 - » Bedford Borough Council
 - » Buckinghamshire County Council
 - » Central Bedfordshire Council
 - » North Northamptonshire Council
 - » West Northamptonshire Council

Survey of Travelling Communities

- As a result of travel and social distancing restrictions due to COVID-19 in March 2020, a 2-stage methodology was used to complete the site and yard fieldwork.
- Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 attempts were made to interview households where it was not initially possible to conduct an interview because they were not available at the time.

- Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.
- ORS worked closely with the Council to ensure that the interviews would collect all the necessary information to support the study. The site interview questions that were used (see **Appendix E**) have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the planning definition. All interviews were completed by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet current and future needs.
- Researchers also sought information from residents on the type of pitches they may require in the future for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.16 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).

Stage 1 – Telephone Interviews (July 2021)

The first phase of the fieldwork involved Researchers from ORS attempting to complete interviews over the telephone with residents living on sites and yards. This is an approach that ORS have followed in all of our GTAAs that have been completed since the COVID-19 restrictions were introduced. Contact details were sought through local stakeholders including site owners and site managers; by contacting Planning agents known to operate in the local area; and by sending letters to residents asking them to contact ORS to complete an interview – including follow-up letters. The wording of the letter that ORS currently use has been agreed with members of the Travelling Community and asks households to call ORS Researchers to complete an interview over the telephone. During interviews ORS Researchers also asked households if they had family or friends living on sites in the area and asked them to pass on our contact details and to encourage them to call us.

Stage 2 – Socially-Distanced Engagement (August 2021)

When the initial phase of telephone interviews had been completed, ORS sought to complete socially-distanced engagement with households on sites where it had not been possible to complete interviews over the telephone. ORS completed a detailed COVID-19 Risk Assessment that allowed for limited fieldwork activities to resume. At the time of this study this was restricted to making observational visits to sites to confirm site names and occupancy levels, and to share contact details with households on sites and yards whilst observing social distancing requirements – for example hand delivering contact letters or exchanging contact details to complete interviews at a later date.

Engagement with Bricks and Mortar Households

- The 2011 Census recorded 15 households that were identified as either Gypsies or Irish Travellers who lived in a house or bungalow in Milton Keynes and 4 living in a flat or maisonette.
- ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; information from housing registers; and other local knowledge from stakeholders. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity put in place.

Timing of the Fieldwork

ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also to avoid days of known local or national events. However, due to COVID-19 restrictions the fieldwork was completed between July 2021 and September 2021 and Researchers were able to collect information on all residents living on sites in Milton Keynes.

Applying the Planning Definition

- The primary change to PPTS (2015) in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. The revised PPTS was issued in 2015 and a number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age.
- The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
 - » Whether any household members have travelled in the past 12 months.
 - » Whether household members have ever travelled.
 - » The reasons for travelling.
 - » Where household members travelled to.
 - » The times of the year that household members travelled.

- » Where household members stay when they are away travelling.
- » When household members stopped travelling.
- » The reasons why household members stopped travelling.
- » Whether household members intend to travel again in the future.
- » When and the reasons why household members plan to travel again in the future.
- When the household interviews were completed, the answers from the questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.
- Households that need to be formally considered in the GTAA fall under one of three classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
 - » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily under the planning definition.
 - » Households where an interview was not possible who may fall under the planning definition.
- Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Council with components of need to consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the revised NPPF (2021).

Undetermined Households

- ^{3.28} As well as calculating need for households that meet the planning definition, a GTAA has to consider the needs of any households where an interview was not able to be completed (either due to refusal to be interviewed or households that were not present during the fieldwork period). There were none in Milton Keynes as interviews were completed with households living on all pitches. Whilst there is no law or guidance that sets out how the needs of these households should be addressed; an approach would have been taken that sought an estimate of potential need from these households. This would be an additional need figure over and above the need identified for households that meet the planning definition.
- The estimate would seek to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. As the demographics of any undetermined households are unknown, the ORS national household formation rate of 1.50% has been used.
- ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.

- However, data that has been collected from over 5,000 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall, approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 400 interviews that have been completed) and in some local authorities, no households meet the planning definition.
- ORS are not implying that this is an official national statistic rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on approximately 30% of them at a representative range of sites. Approximately 30% meet the planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.
- This would also suggest that it is likely that only a proportion of any potential need identified from undetermined households would need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through separate Local Plan Policies.
- 3.34 The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:
 - 150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, MM242h is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" the whole Plan need not be reviewed.

Households that Do Not Meet the Planning Definition

Households who do not travel for work now fall outside of the planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) 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, or places on inland waterways where houseboats can be moored. Draft Guidance⁴ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as

⁴ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

- part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the revised NPPF (July 2021).
- ^{3.36} Paragraph 62 of the revised NPPF states that [emphasis added] 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

Calculating Current and Future Need

To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

- The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:
 - » Current vacant pitches.
 - » Pitches currently with planning consent due to be developed within 5 years.
 - » Pitches vacated by people moving to housing.
 - » Pitches vacated by people moving from the study area (out-migration).
- 3.39 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation i.e., on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

- 3.40 The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:
 - » Households on unauthorised developments for which planning permission is not expected.
 - » Concealed, doubled-up or over-crowded households (including single adults).
 - » Households in bricks and mortar *needing* to move to sites.
 - » Households in *need* on waiting lists for public sites.

Future Need

- 3.41 The final stage was to identify components of future need. This includes the following four components:
 - » Teenage children in need of a pitch of their own in the next 5 years.
 - » Households living on sites with temporary planning permission.
 - » New household formation.
 - » In-migration/roadside.
- Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.
- ^{3.43} ORS are also increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them *displaced in-migration*.
- All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showpeople are identified separately and the needs are to 2040.

Pitch Turnover

3.45 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any local need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers⁵ produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

⁵ See www.londongypsiesandtravellers.org.uk/resources/ for details.

Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

- GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.
 - » Transit sites full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
 - » Emergency stopping places more limited facilities.
 - » Temporary sites and stopping places only temporary facilities to cater for an event.
 - » Negotiated stopping places agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.
- Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.
- An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.
- Another alternative is 'negotiated stopping'. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

- The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).
- In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry of Housing Communities and Local Government (MHCLG)⁶ Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

⁶ Formerly the Department for Communities and Local Government (DCLG).

4. Gypsy, Traveller & Travelling Showpeople Sites & Population

Introduction

- One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁷. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- The Gypsy, Traveller and Travelling Showpeople population also has other types of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.

⁷ Whilst it has now been withdrawn, Government Guidance on *Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

^{4.5} Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards in Milton Keynes

In Milton Keynes, at the base date for the GTAA, there were 2 public Gypsy and Traveller sites (18 pitches). No other sites were identified. See **Appendix D** for further details.

Figure 5 - Total amount of provision in Milton Keynes (September 2021)

Category	Sites/Yards	Pitches/Plots
Public sites	2	18
Private sites with permanent planning permission	0	0
Private pitches	0	0
Private sites with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	0	0
Long-term unauthorised encampments	0	0
Public transit sites	0	0
Travelling Showpeople yards	0	0
TOTAL	2	18

MHCLG Traveller Caravan Count

- ^{4.7} Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, it was renamed the Traveller Caravan Count due to the inclusion of data on Travelling Showpeople.
- As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.
- 4.9 The most recent Traveller Caravan Count in January 2020⁸ recorded 33 caravans on socially rented sites.

⁸ There was no count in July 2020 or January 2021 as a result of COVID-19, and the July 2021 count has not been published at the time of this report.

Stakeholder Engagement

Introduction

- ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- A total of 2 interviews were undertaken with Council Officers from the study area.
- As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 5 neighbouring local authorities:
 - » Bedford Borough Council
 - » Buckinghamshire County Council
 - » Central Bedfordshire Council
 - » North Northamptonshire Council
 - » West Northamptonshire Council
- Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

Views of Key Stakeholders and Council Officers in Milton Keynes

Accommodation Needs

- Following the previous GTAA (2017), within Milton Keynes there remained a total of 12 pitches allocated which have yet to be provided. This consists of 8 pitches on a new site at Newton Leys and 4 additional pitches to be provided as part of an extension to the Calverton Lane site. With the retention of these existing allocations, Milton Keynes will need to provide for an additional 7 pitches over the previous plan period and those are intended to be accommodated through South East Milton Keynes Strategic Urban Extension site (Policy SD11).
- The current assessment will review the need in line with national planning policy and best practices available. It is intended to review the need for provision of permanent and transit sites and to allow forming of a new strategy which provides optimum, long-term solutions.
- There are currently no vacant pitches on either of the public sites and approximately 25 households on the waiting list for a pitch, as per information from the previous GTAA (2017).

Short-term Encampments and Transit Provision

- In 2018 Milton Keynes experienced a far greater number of unauthorised encampments when compared to their yearly average. The increase was attributed to pitches becoming available on the Calverton Road site in the area, with Gypsies and Travellers therefore visiting the area in the hope of obtaining one of the available pitches. An action plan to tackle the issue of unauthorised encampments was agreed at Council in July 2018. Update on progress have been recently provided during Cabinet meeting on 1st September 2020.
- The Council have been advised by their Gypsy and Traveller Liaison Officer that temporary roadside dwellers are often visiting families attending family occasions. The last GTAA reviewed the transit requirements and it was recommended that, whilst there may be relatively high numbers of encampments in some areas, the situation relating to levels of unauthorised encampments should be continually monitored whilst any potential changes associated with the new PPTS develop.
- At the time of the COVID outbreak there were no unauthorised encampments in Milton Keynes. However, during the outbreak a couple of families came into Milton Keynes who had pitches in Buckinghamshire. These families were not allowed back onto their sites as they had recently travelled back from Ireland and had to isolate before going back onto the sites. The families were allowed to stay and moved back onto their sites after the 10-day isolation period. Since the pandemic the number of encampments visiting has remained lower than previous years.
- There are currently no negotiated stopping places or formal transit provision in the area. It was felt that having agreed stopping places would help make management of encampments easier by having somewhere to direct encampments.

Cross Border Issues

- No specific cross border issues were identified.
- Milton Keynes Council welcome Duty to Cooperate discussions with adjoining authorities. The Council does not have any Duty to Cooperate issues in terms of Gypsy and Traveller provision.
- Milton Keynes communicates on an ad hoc informal basis with neighbouring authorities on the movements of unauthorised encampments. This involves the sharing of information regarding how many groups there are, size of groups and whether they intend to move into another authority.

Future Priorities and Any Further Issues

^{5.16} A future priority identified was to review possible provision of temporary stopping places.

Neighbouring Authorities

Bedford Borough Council

- With regard to **overall accommodation need** in Bedford, the views of the officer interviewed were as follows:
 - » Since the last GTAA, Bedford have gained planning permission for an extension at the Kempston Hardwick Site to meet the identified need. The Council are also in the process of bringing forward an allocated Showperson yard.
 - » Short-term unauthorised encampments in the area occur for many reasons, such as for family occasions, holidays, work opportunities, and also as a result a lack of pitches for locals to settle on.
 - » It was felt that a negotiated stopping place within Bedford would be beneficial, although it was acknowledged that sufficient resources would be needed to ensure it was managed effectively.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
 - » No issues were identified with regard to neighbouring authorities meeting their own identified need.
 - » The Gypsy and Traveller Officers communicate with other councils regularly, sharing information and tips on best practice during quarterly meetings.
 - » Bedford feel they generally work well through the Duty to Cooperate with all their neighbouring authorities.

Buckinghamshire County Council

- With regard to **overall accommodation need** in Buckinghamshire, the views of the officer interviewed were as follows:
 - Buckinghamshire Council was created on 01/04/2020 from the five former LPAs in the area (Aylesbury, Chiltern, South Bucks, Wycombe DCs and Buckinghamshire CC). There are legacy planning policies from each of the areas and work in progress on a new Local Plan for Buckinghamshire.
 - » Unauthorised encampments are monitored by an officer within Buckinghamshire County Council and a weekly update is provided.
 - » Many of the stopping places tend to be repeat locations which differ in popularity given the time of the year. Car parks and hard standing areas are targeted when the weather is not great, and recreation grounds or fields are targeted during the summer months when the ground is dry.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
 - » No specific cross border issues were identified.

» It was felt that Buckinghamshire County and neighbouring authorities are complying with the Duty to Cooperate.

Central Bedfordshire Council

- With regard to **overall accommodation need** in Central Bedfordshire, the views of the officer interviewed were as follows:
 - Since the last GTAA (April 2016) was completed for Central Bedfordshire, approval has been granted for a total of 44 pitches for Gypsies and Travellers on both public and private sites. In total, 2 of these pitches are temporary and a further 2 pitches have been lost from the supply due to the expiry of an approval. This leaves a net increase of 40 permanent pitches for Gypsies & Travellers in Central Bedfordshire. As part of this increase of 40 permanent pitches, construction was completed on a new public site of 10 pitches for Gypsies and Travellers in 2018 to help meet the identified need.
 - There have continued to be some overcrowded Gypsy and Traveller and Travelling Showpeople sites and unauthorised Gypsy and Traveller encampments, the former representing some concealed households from natural extended family growth and the tendency for growth in the numbers of non-travelling Travellers. A contributory issue to the rise in caravan count numbers and overcrowding has been the rise of Gypsy and Traveller landlord control of some sites and the tenancy of sites by non-Travellers which has been significant in some cases.
 - » Short-term unauthorised encampments do occur in the area. The Council has initial approval to build and develop temporary stopping provision to provide a safe location to stop in whilst in Central Bedfordshire. The project for this site is in the initial stages of development. The Council otherwise move on Gypsy and Traveller encampments as they occur in accordance with normal procedures of law.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
 - » No specific cross-border issues were identified with neighbouring authorities.
 - » It was felt that joint working between authorities could be improved. Providing planning departments with more knowledge of family movements and acquisition of sites and general trends was suggested, although possible data protection constraints were considered.
 - » It was also felt that Central Bedfordshire and the neighbouring authorities were all complying with the Duty to Cooperate.

North Northamptonshire

- With regard to **overall accommodation need** in North Northamptonshire, the views of the officers interviewed were as follows:
 - » A GTAA was completed in March 2019 for North Northamptonshire, this identified need to 2033. The GTAA will be used to inform a North Northamptonshire Gypsy Site Allocation Policy DPD. The Council is commissioning consultants to undertake a

- further piece of work to better understand accommodation needs and a variety of options to meet these needs.
- » There is a need for more provision across North Northamptonshire and the lack of transit sites or temporary stopping places contributes to a growing list of long-term unauthorised encampments.
- » There are several unauthorised encampments that have been permitted to stay and not been moved on. The longest-term encampment has existed since January 2018.
- » There are records of short-term unauthorised encampments dating back to December 2003. There is no consistency on the number of unauthorised encampments witnessed, with numbers varying (i.e., increasing/decreasing) each year.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
 - » The main cross border issues are likely to be between West Northants and North Northants as there are a number of sites close to the border of the former Daventry and Kettering Council areas and between Market Harborough and North Northants.
 - » Cross-border migration of Irish Travellers between Bedfordshire, Leicestershire and Milton Keynes was also discussed.
 - » It was felt that North Northants comply with the Duty to Cooperate.

West Northamptonshire

- With regard to **overall accommodation need** in West Northamptonshire, the views of the officers interviewed were as follows:
 - » There is a need for more provision across West Northamptonshire and the lack of transit sites or temporary stopping places contributes to growing list of long-term unauthorised encampments. These long-term encampments will require permanent provision in the near future.
 - » There are several unauthorised encampments that have been permitted to stay and not been moved on. The longest-term encampment has existed since January 2018.
 - » There are records of short-term unauthorised encampments dating back to December 2003. Historically, the area witnesses a high number of encampments each year. The same family groups will often stop in the area each year, often in the same locations. The size of encampments varies from large to small groups, usually averaging around 6 – 12 caravans.
- With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the officer interviewed were as follows:
 - » The main cross border issues are likely to be between West Northants and North Northants as there are a number of sites close to the border of the former Daventry and Kettering Council areas.

»	Cross-border migration of Irish Travellers between Bedfordshire, Leicestershire and
	Milton Keynes was also discussed.

» I	t was felt	that both W	est Northani	ts comply witl	h the Duty t	o Cooperate.
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Survey of Travelling Communities

Interviews with Gypsies and Travellers

- One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- Through the desk-based research and stakeholder interviews ORS identified 2 public Gypsy and Traveller sites (18 pitches). No other sites or yards were identified.
- The table below sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 6 - Interviews completed in Milton Keynes

Site Status	Pitches/Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
Calverton Lane	12	12	-
Willen Road	6	6	-
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites/Pitches			
None	-	-	-
Bricks and Mortar			
Various	3	3	-
In-Migration			
Buckinghamshire	1	1	-
Travelling Showpeople			
None	-	-	-
TOTAL	22	22	

Interviews with Gypsies and Travellers in Bricks and Mortar

Following all of the efforts that were made it was possible to identify and interview 3 households living in bricks and mortar.

Current and Future Pitch Provision

Introduction

- This section focuses on the pitch provision which is needed in the study area currently and to 2040. This includes both current unmet need and need which is likely to arise in the future⁹. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- This section concentrates not only upon the total provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- Nationally, a household formation and growth rate of 3.00% net per annum¹⁰ has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for pitches unrealistically. In this context, ORS prepared a *Technical Note on Gypsy and Traveller Household Formation and Growth Rates* in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix F**.
- Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic so the only proper way to project future population and household growth is through demographic analysis.
- The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- 7.7 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and

⁹ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

¹⁰ Page 25, *Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007)* Now withdrawn.

Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.

This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

Another more recent case was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- In addition, the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice in December 2017. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit.
- ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- Overall, the household growth rate used for the assessment of future needs has been informed by local evidence. In normal circumstances local demographic evidence would be used to adjust

- the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status). This approach has been used to estimate new household formation for households that did not meet the planning definition.
- In certain circumstances where the numbers of households and children are low, or the population age structure is skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales. This approach has been taken to determine levels of new household formation in Milton Keynes for households that met the planning definition due to low numbers of children aged under 18.
- Overall new household formation has also been adjusted to take account of teenagers in need of a pitch in the next 5 years who have already been identified as components of need in their own right. This eliminates any double counting in the assessment of need.

Breakdown by 5 Year Bands

In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS (2015). The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time.

Applying the Planning Definition

- The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition or those who demonstrated that they have ceased to travel temporarily (due to education, ill health, or old age) form the components of need in the GTAA that will need to be addressed through a Gypsy and Traveller Local Plan Policy. In addition, households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning definition has also been assessed to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- The information used to assess households against the planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. The table below sets out the planning status of households that were interviewed for the Milton Keynes GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults and accepted in-migration.

Figure 7 - Planning status of households in Milton Keynes

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	8	23	0
Private Sites	0	0	0
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	0	0	0
Bricks and Mortar	0	3	0
Unauthorised Encampments	0	0	0
In-Migration	0	1	0
Sub-Total	8	27	0
Travelling Showpeople			
Private Yards	0	0	0
Sub-Total	0	0	0
TOTAL	8	27	0

- ^{7.18} Figure 7 shows that for Gypsies and Travellers, 8 households met the planning definition of a Traveller, in that ORS were able to determine that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily.
- A total of 27 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health, or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently.
- ^{7.20} It was to make contact with all households during the fieldwork period so there are no households are recorded as undetermined for the purposes of the GTAA.

Interviews with Gypsies and Travellers in Bricks and Mortar

Following all of the efforts that were made, it was possible to identify and interview 3 households living in bricks and mortar. All 3 households did not meet the planning definition.

Migration/Roadside

The study has also sought to address in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.

- The study also sought to identify any need from households who have been forced to move from sites due to overcrowding and who are currently living on the roadside or on sites in other local authorities and who have strong family links with households in Milton Keynes. These are referred to as roadside households or displaced in-migration.
- ^{7.24} In addition, as a result of COVID-19, the study sought to identify any households that had been displaced from their usual place of residence due to lockdown restrictions who were currently located in Milton Keynes.
- Find the first stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified 1 household living in another local authority who need to move back to a site in Milton Keynes.
- ORS have found no firm evidence from other local studies that have been completed recently of any additional households wishing to move to Milton Keynes. Therefore, other than the household identified above net migration to the sum of zero has been assumed for the GTAA which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- 7.27 It is important to note that any applications for new sites or additional pitches as a result of inmigration should be seen as windfall need and should be dealt with by a Criteria-Based Local Plan Policy and will not contribute towards meeting need identified in the GTAA and the 5-year supply.

Public Site Waiting List

Discussions indicated that there are no waiting lists for either site. While there are enquires, vacancies very rarely occur and often the property is re-let via family successions.

Pitch Needs – Gypsies and Travellers that meet the Planning Definition

- The 8 Gypsy and Traveller households that met the planning definition were found on the 2 public sites in Milton Keynes.
- Analysis of the household interviews indicated that there is a need for 3 pitches from concealed or doubled-up households or single adults; 1 pitch for a teenager; and 5 pitches as a result of new household formation, derived from the demographics of the residents. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller is for **9 pitches** over the GTAA period.

Figure 8 – Need for Gypsy and Traveller households in Milton Keynes that met the Planning Definition (2021-40)

Gypsies and Travellers - Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	3
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	3
Future Need	
5 year need from teenage children	1
Households on sites with temporary planning permission	0
In-migration/Roadside	0
New household formation	5
(Formation from household demographics)	
Total Future Needs	6
Net Pitch Need = (Current and Future Need – Total Supply)	9

Figure 9 – Need for Gypsy and Traveller households in Milton Keynes that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	Total
	2021-25	2026-30	2031-35	2036-40	Total
	4	2	2	1	9

Pitch Needs – Undetermined Gypsies and Travellers

^{7,31} There is **no need for undetermined households** as interviews were completed with households living on all pitches in Milton Keynes.

Pitch Needs - Gypsies and Travellers that do not meet the Planning Definition

- 7.32 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985)¹¹ and the revised NPPF (2021) and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies.
- On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.
- There is a **need for 20 pitches for households that did not meet the planning definition**. This is made up of 4 concealed or doubled-up households or single adults; 3 moving from bricks and mortar accommodation; 5 from teenage children; 1 from in-migration; and 7 from new household formation, using a rate of 1.70% derived from the household demographics.

¹¹ See Paragraph 3.34 for details.

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople

^{7.35} There were no Travelling Showperson's yards identified in Milton Keynes so there is no current or future need for plots.

Figure 10 – Need for Travelling Showpeople households in Milton Keynes that met the Planning Definition (2021-40)

Travelling Showpeople - Meeting Planning Definition	Pitches
Supply of Plots	
Supply from vacant public and private plots	0
Supply from pitches on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	0
(No Travelling Showpeople)	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 11 – Need for Travelling Showpeople households in Milton Keynes that met the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	Total	
	2021-25	2026-30	2031-35	2036-40	Total	
	0	0	0	0	0	

Transit Requirements

7.36 When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count, the outcomes of the stakeholder interviews and records on numbers of unauthorised encampments.

MHCLG Traveller Caravan Count

- Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- Data from the Traveller Caravan Count shows that there were 29 unauthorised caravans recorded between 2016 and 2019. As a result of COVID-19 the July 2020 and January 2021 Caravan Counts were cancelled. These are understood to have been on one-off encampments as a result of people visiting for events.

Stakeholder Interviews Local Data

The Stakeholder interviews identified that there are a small number of short-term encampments that stop in the area. At present each new encampment in the area is assessed on its own merits and a decision reached accordingly on whether to tolerate or take enforcement action.

Transit Recommendations

- Due to historic low numbers of short-term unauthorised encampments, it is not recommended that there is a need for a formal public transit site in Milton Keynes at this time.
- 7.41 The situation relating to levels of short-term unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 7.42 It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above should be undertaken. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.

- ^{7.43} In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements should continue to be considered.
- The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between a Council and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 7.45 Temporary stopping places can also be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to consider providing basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

8. Conclusions

This study provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, the revised National Planning Policy Framework (NPPF) 2021, and Planning Practice Guidance (PPG) 2021. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

- 8.2 In summary there is a need for:
 - 9 pitches in Milton Keynes over the GTAA period to 2040 for Gypsy and Traveller households that met the planning definition.
 - » No pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 20 pitches for Gypsy and Traveller households who did not meet the planning definition.
- In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, 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.
- 8.4 The majority of need identified for Gypsies and Travellers in Milton Keynes was from households living on the public site. The Site Manager has indicated that there could be opportunities to subdivide some of the larger double pitches on the site to seek to meet current and future need.
- The Council will also need to carefully consider how to address any needs from households seeking to move to Milton Keynes (in-migration), or from any households currently living in bricks and mortar who may wish to move to a site. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in PPTS).
- Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households who do not fall within the PPTS planning definition should be met as part of general housing need, and through separate Local Plan Policies. In addition, as set out above, the Site Manager for the public site has indicated that there could be opportunities to sub-divide some of the larger double pitches on the site to seek to meet current and future need.
- 8.7 It is recognised that the Council is in the process of preparing a new Local Plan that sets out overall housing need. The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies and Travellers. Whilst the findings in this report are aggregated totals for the whole of Milton Keynes due to data protection issues, the Council have more detailed data to support the preparation on the new Local Plan.

Travelling Showpeople

There were no Travelling Showpeople identified in Milton Keynes so there is no current or future need for plots.

Transit Provision

- Due to historic low numbers of short-term unauthorised encampments, it is not recommended that there is a need for a formal public transit site in Milton Keynes at this time.
- In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements should continue to be considered.

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Appendix A: Glossary of Terms / Acronyms used

Amenity block	A building where basic plumbing amenities
,	(bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers.
	Also referred to as trailers.
Concealed household	Households, living within other households, who
	are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number
•	of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be
<i>o</i> , <i>o</i>	occupied by Gypsies and Travellers while they
	travel.
Green Belt	A land use designation used to check the
	unrestricted sprawl of large built-up areas; prevent
	neighbouring towns from merging into one another;
	assist in safeguarding the countryside from
	encroachment; preserve the setting and special
	character of historic towns; and assist in urban
	regeneration, by encouraging the recycling of
	derelict and other urban land.
Household formation	The process where individuals form separate
	households. This is normally through adult children
	setting up their own household.
In-migration	Movement of households into a region or
	community
Local Plans	Local Authority spatial planning documents that can
	include specific policies and/or site allocations for
	Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order
	to settle in another.
Pitch/plot	Area of land on a site/development generally home
	to one household. Can be varying sizes and have
	varying caravan numbers. Pitches refer to Gypsy
	and Traveller sites and Plots to Travelling
	Showpeople yards.
Private site	An authorised site owned privately. Can be owner-
	occupied, rented or a mixture of owner-occupied
	and rented pitches.
Site	An area of land on which Gypsies, Travellers and
	Travelling Showpeople are accommodated in
	caravans/chalets/vehicles. Can contain one or
	multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local
	authority or a Registered Housing Provider.

Temporary planning permission	A private site with planning permission for a fixed
	period of time.
Tolerated site/yard	Long-term tolerated sites or yards where
	enforcement action is not expedient, and a
	certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range
	of facilities. There is normally a limit on the length
	of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers
	and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and
	Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers
	of applications to live on a site.
Yard	A name often used by Travelling Showpeople to
	refer to a site.

GTAA	Gypsy and Traveller Accommodation Assessment	
LPA	Local Planning Authority	
MHCLG	Ministry of Housing, Communities and Local	
	Government	
NPPF	National Planning Policy Framework	
ORS	Opinion Research Services	
PPG	Planning Practice Guidance	
PPTS	Planning Policy for Traveller Sites	

Appendix B: Undetermined Households

Figure 12 - Need for undetermined Gypsy and Traveller households in Milton Keynes (2021-40)

Gypsies and Travellers – Undetermined	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on sites with temporary planning permission	0
In-migration/Roadside	0
New household formation	0
(No undetermined households)	
Total Future Needs	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 13 - Need for undetermined Gypsy and Traveller households in Milton Keynes by 5-year periods

Years	0-5	6-10	11-15	16-20	Total
	2021-25	2026-30	2031-35	2036-40	Total
	0	0	0	0	0

Figure 14 - Need for undetermined Travelling Showpeople households in Milton Keynes (2021-40)

Travelling Showpeople – Undetermined	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration/Roadside	0
New household formation	0
(No Travelling Showpeople)	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 15 – Need for undetermined Travelling Showpeople households in Milton Keynes by 5-year periods

Years	0-5	6-10	11-15	16-20	Total
rears	2021-25	2026-30	2031-35	2036-40	Total
	0	0	0	0	0

Appendix C: Households that did not meet the Planning Definition

Figure 16 - Need for Gypsy and Traveller households in Milton Keynes that did not meet the Planning Definition (2021-40)

Gypsies and Travellers - Not Meeting Planning Definition	Pitches
Supply of Pitches	
Supply from vacant public and private pitches	0
Supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	4
Movement from bricks and mortar	3
Households on waiting lists for public sites	0
Total Current Need	7
Future Need	
5 year need from teenage children	5
Households on sites with temporary planning permission	0
In-migration/Roadside	1
New household formation	7
(Household base 27 and formation rate 1.70%)	
Total Future Needs	13
Net Pitch Need = (Current and Future Need – Total Supply)	20

Figure 17 – Need for Gypsy and Traveller households in Milton Keynes that did not meet the Planning Definition by 5-year periods

Voors	0-5	6-10	11-15	16-20	Total
Years	2021-25	2026-30	2031-35	2036-40	Total
	13	4	2	1	20

Figure 18 - Need for Travelling Showpeople households in Milton Keynes that did not meet the planning definition (2021-40)

Travelling Showpeople - Not Meeting Planning Definition	Plots
Supply of Plots	
Supply from vacant public and private plots	0
Supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Total Current Need	0
Future Need	
5 year need from teenage children	0
Households on yards with temporary planning permission	0
In-migration	0
New household formation	0
(No Travelling Showpeople)	
Total Future Needs	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Figure 19 – Need for Travelling Showpeople households in Milton Keynes that did not meet the Planning Definition by 5-year periods

Years	0-5	6-10	11-15	16-20	Total
rears	2021-25	2026-30	2031-35	2036-40	TOLAT
	0	0	0	0	0

Appendix D: Site and Yard Lists (September 2021)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots	
Public Sites			
Calverton Lane	12	-	
Willen Road	6	-	
Private Sites with Permanent Permission			
None	-	-	
Private Sites with Temporary Permission			
None	-	-	
Tolerated Sites-Long-term without Planning Permission			
None	-	-	
Unauthorised Sites			
None	-	-	
Unauthorised Encampments			
None	-	-	
TOTAL PITCHES	18	0	
Travelling Showpeople Yards			
None	-	-	
TOTAL PLOTS	0	0	
TOTAL	18	0	

Appendix E: Household Interview Questions

GTAA Questionnaire 2019



INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

Α		General I	nformation		
A1	Name of planning aut	hority:			
~'	INTERVIEWER please wri	te in			
A2	Date/time of site visit	(s):	DD/MM/Y	Υ	TIME
	INTERVIEWER please wri	te in			
А3	Name of interviewer: INTERVIEWER please wri	te in			
A4	Address and pitch nu				
A5	Type of accommodation	n: INTERVIEWER	please cross one	box only	
	Council Pri	vate rented Pr	rivate owned	Unauthor	ised Bricks and Mortar
A6	Name of Family: INTERVIEWER please write	e in			
A7	Ethnicity of Family: INTERVIEWER please cros	ss one box only			
	Romany Gypsy	Irish Travelle		Gypsy or veller	Show Person
	New Traveller	English Trave	ller Wels	h Gypsy	Non-Traveller
		Other (please spe	cify)		
A8	Number of units on the INTERVIEWER please write				
	Mobile homes	Touring Carav	ans Day	Rooms	Other (please specify)

A9	Is this site y					f not whe	re is?			_
	Yes		No	lf n	ot main pl	ace of res	idence w	here is (p	lease spe	ecify)
A10	How long ha						the past	5 years,	where d	id
	Years		Months			u have mo d you mov				5
A11	Did you live there was n		_						ner optio	n? If
	Choice	١	No option)		lf no	o option, v	why?		
A12	Is this site: (For examp	le clos	e to sch	ools, w	ork, healt	_		-		
	Yes		No			Reason	ıs (please	specify)		
A13	How many s	separat R: Please	te familie	s or un	married a	adults live	on this	pitch?		
	1	2	3	4	5	6	7 □	8	9	10
В				De	emograp	hics				
B1	Demograph Person		Househo Persor		<i>TERVIEWEI</i> Perso		rite-in			
		\ge	Sex	Age	Sex	Age				
	Complete a									
	Sex A	4 \ge	Persor Sex	Age	Perso Sex	Age Age	Perso Sex	Age	Persor Sex	Age
	JON /	igo	00%	rigo	Jon	, igo	00%	rigo	OUN	7190
С				Accon	nmodati	on Need	s			
C1	How many their own in								d of a pi	tch of
	INTERVIEWE	R: AN A	DULT IS DE	EFINED A	AS 16+					
	1	2	3	4	5	6	7	8	9	10
	ш			ш	Other Plea	ase specify				

C2	How many If they live to move? (continued to the local site if	here no e.g. oth hey curi	w, will ther site, in er site, in rently live	ney want n bricks e and wo a pitch? 4	to stay of and mort ould they interview 5	on this sit ar etc.) If want to I WER: Pleas	te? If not they do move on e cross one	, where v not live o to this s	vould the	te,
D				W	aiting L	ist				
D1	Is anyone I			,	g list for	a pitch in	this area	a?		
		Yes No				→ Contii → Go to	nue to D2 D4	?		
D2	How many INTERVIEWE 1				n the wai	ting list f	or a pito	h in this	area?	10
				0	ther (Pleas	se specify)				
				Deta	ils (Pleas	e specify)				
D3	How long h		3-6 mor		eiting list 6-12 m			ase cross o		y ears
	Ц			C	L Other (Plea	se specify)			L	
				Det	ails (Pleas	se specify)			
D4	If they are I waiting list INTERVIEWE	? (INTE	RVIEWE	R if they						n the
	1	2	3	4	5	6	7 □	8	9	10
	No			O	ther (Pleas	e specify)				
			Details (Please s	pecify) an	d take co	ntact deta	ails)		

E		Future Acco	mmodation N	leeds	
E1	_ ,		le to E2	ars? If so, why? If so, why? (please	specify)
E2	Where would you	move to? INTER	/IEWER: Please cro	ss one box only	
	Another site in this area (specify where)	council area	in this area	mortar in another council area	Other (e.g. land they own elsewhere) (Please specify)
	If you want to move public or private site Private buy	If they own lan		te pitch or site, or	rent a pitch on a blic rent
E4	Can you afford to		ch or site? INTER	VIEWER: Please cross	one box only
		Ĩ			
E5	Are you aware of, opitches? INTERVIEW			d have potential fo	or new
		Yes		No	
	Please ask for		and/site is locate	d and who owns the	e land/site?

F	Travelling
1	How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months? INTERVIEWER: Please cross one box only
	0 1 2 3 4 5+
	Go to F6a Continue to F2
2	If you or members of your family have travelled in the last 12 months, which family members travelled? INTERVIEWER: Please cross one box only
	All the family Adult males Other
	If other, please specify
3	What were the reasons for travelling? INTERVIEWER: Please cross all that apply
	Work Holidays Visiting family Fairs Other
	Details / aposity if passagery If fairs probe for whether this is involved work
	Details / specify if necessary. If fairs—probe for whether this is involves work
4	At what time of year do you or family members usually travel? And for how long? INTERVIEWER: Please cross one box only
	All year Summer Winter
	And for how lange?
	And for how long?
5	Where do you or family members usually stay when they are travelling? INTERVIEWER: Please cross all boxes that apply
	LA transit Private Roadside Friends/ Other If other, please specify
	INTERVIEWER: Ask F6a — F8 ONLY if F1 = 0. Otherwise, go to F9
6a	Are there any reasons why you don't you travel at the moment?
	Details
6b	Have you or family members ever travelled? INTERVIEWER: Please cross one box only
	Yes ☐ ———— Continue to F7
	No \square Go to F9
7a	When did you or family members last travel? INTERVIEWER: Please write in
	Details
7b	
	Work Holidays Visiting family Fairs Other ☐ ☐ ☐ ☐ ☐ ☐
	Details / specify if necessary. If fairs—probe for whether this is involves work
	© Opinion Research Services 2019

8	Why do you	u not travel	anymore?	INTERVIEWER:	Cross all box	es that apply & prob	e for details
	Children in school	III health	Old age	Settled now	Nowhere to stop	No work opportunities	Other
			lf.	other, please s	enocify		
			- 11	outer, piease s	specify		
	Details a	bout childrer	n in school.	types of ill hea	alth, or looki	ng after relative	with poor
	Dotailo			ic problems/iss			mar poor
 	Do Woll or of	ther femily:	mambara r	alan ta traval i	in the futur	•3	
	NTERVIEWER	R: Please cross					
		Yes			Continue to	F10	
	Dor	No n't know	H		Go to G1 Go to G1		
				ou/they plan t			
				Details			
 11	Is there any	thing else	you would	like to tell us	about your	travelling patte	erns?
				Details			
				-	_	ices 20	

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G	Any other information
G1	Any other information about this site or your accommodation needs? INTERVIEWER: Please write in
	Details (e.g. can current and future needs be met by expanding or intensifying the existing site?
	by expanding of intensitying the existing site?
G2	Site/Pitch plan? Any concerns? INTERVIEWER: Please sketch & write in
	Sketch of Site/Pitch — any concerns?
	Are any adaptations needed?
	Why does the current accommodation, not meet the household's needs and sould their
	Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently
	and the state of t
	© Opinion Research Services 2019 Page 7

н		Bricks & Mortar Contacts	
H1	Contacts for Bricks and Mo	ortar interviews? INTERVIEWER: Please write in	
		Details	
		Council contact?	
Would you like the council to contact you about any of the issues raised in this interview? Please note that although ORS will pass on your contact details to the Council we cannot guarantee when they will contact you? INTERVIEWER: Please cross one box only			
	Yes □	No □	
INTERVIEWER: Can I confirm your name and telephone number so that we can pass them on to the Council for this purpose only. Your details will only be used for this purpose and will not be passed onto anyone else.			
Res	pondent's Name		
Res	pondent's Telephone		
Res	pondent's Email		
Interview log			
INTERVIEWER: Please record the date and time that the interview was carried out			
Date	e		
Time	e of interview		

Appendix F: Technical Note on Gypsy and Traveller Household Formation and Growth Rates