



**Settlements and Countryside Local Plan (Part 2) for  
Daventry District  
Examination**

**Response by Daventry District Council**

**Matter 6: Gypsies, Travellers and Travelling  
Showpeople**

**Date: May 2019**

## 1. Introduction

- 1.1 This statement sets out the response of Daventry District Council (DDC) to the following issues and questions raised by the Inspector relating to Matter 6 of the examination into the Settlements and Countryside Local Plan (Part 2) for Daventry District.
- 1.2 References used in this statement (e.g. PSD06) relate to documents held in the Examination Library available on the Council's website on the [Local Plan Examination webpage](#)<sup>1</sup>.

## 2. Response of Daventry District Council to the specific issues and questions relating to Matter 6 – Gypsies, Travellers and Travelling Showpeople

### Issue

Whether the approach for gypsies, travellers and travelling showpeople is positively prepared, justified, effective and consistent with national policy.

### Questions

1. ***Can the Council explain its approach and justification for departing from the accommodation requirements set out in Policy H6 of the JCS and the Plan not identifying sites to meet those requirements? Is such an approach, appropriate and justified for a Part 2 Local Plan?***
  - 2.1.1 The accommodation requirements contained within the WNJCS were established from a Traveller's Accommodation Needs Study (TANS) that was completed in 2013. This was completed in line with the then current planning guidance, included in Planning Policy for Traveller Sites (PPTS), published in 2012.
  - 2.1.2 In August 2015 a new version of the PPTS was issued and the primary change from the 2012 version was a new definition of a traveller for planning purposes. As a result of this change it was considered necessary to complete a new assessment of accommodation need for travellers in Daventry as the 2013 TANS used for the WNJCS was considered to be out of date.
  - 2.1.3 Therefore to take account of the revised guidance set out in PPTS (2015) a new Gypsy and Traveller Accommodation Assessment (GTAA – HOU09) was completed in 2017 by Opinion Research Services (ORS). This covered the West Northamptonshire local authorities of Daventry, Northampton and South Northamptonshire and is the most up to date assessment of need.
  - 2.1.4 The West Northamptonshire GTAA contains a robust and comprehensive evidence-based assessment of the current and future need for accommodation for travellers in

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<sup>1</sup> Local Plan Examination webpage: <https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plan/local-plan-examination/>

Daventry who met, or who may meet, the current planning definition of a gypsy or traveller (as set out in PPTS 2015).

- 2.1.5 It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the current planning definition (as set out in PPTS 2015) This assessment was however completed, and the report provides advice on how the Council should seek to address accommodation need arising from households that do not meet the current planning definition of a traveller through separate local plan policies (as set out in GTAA para 1.6).
- 2.1.6 It should also be noted that since the changes to the PPTS in 2015 the ORS GTAA methodology has been repeatedly found to be sound and robust, including through local plan examinations in Cambridge, Cheltenham, Cotswold, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, South Cambridgeshire and Tewkesbury.
- 2.1.7 The GTAA identified that there were no gypsy or traveller households identified in Daventry District that met the planning definition of a traveller, 24 unknown households that may meet the planning definition and two households that did not meet the planning definition.
- 2.1.8 Given that no households in Daventry District met the planning definition, there is no need for any additional pitches at this time. Potential need of up to seven additional pitches was identified from unknown households and this need will be addressed through the criteria-based policy in the plan.
- 2.1.9 Whilst no longer a requirement for a GTAA, the need from households that did not meet the planning definition is included in the GTAA. Need for one additional pitch was identified from one unauthorised pitch.
- 2.1.10 The Council considers the approach in the plan to be appropriate and justified as it is consistent with national policy both in the revised NPPF (2019) and the PPTS (2015). The proposal as set out within HO9 is considered to be an appropriate approach to meeting the needs as and when they are identified rather than placing a restriction because need has already been met. Using this method the Council is able to continue to work collaboratively with neighbouring authorities as and when needs arise.

**2. *Is there a reason why Policy HO9 does not include pitch targets for gypsies and travellers and plot targets for travelling showpeople? Is the Council able to identify a supply of sites in accordance with the Planning Policy for Traveller Sites (PPTS) and if not, how could delivery otherwise be supported through the Plan?***

- 2.2.1 As set out within Local Plan part 2, the need for residential pitches has been exceeded through permissions granted, therefore, there is no need for further allocations for residential pitches in this plan (Para. 6.6.08). In order for the policy to remain up to date and respond to changing identified need (which will be updated during the plan

period), policy HO9 does not contain specific targets and therefore does not limit the provision should suitable sites come forward. This ensures the policy is flexible and is able to respond to changing circumstances.

2.2.2 Where proposals for pitches come forward, the Council will determine them on a case by case basis against the criteria contained within HO9. The Council considers this approach to be in accordance with PPTS as a criteria-based policy (Policy B para. 11, PPTS 2015).

**3. *Does the West Northamptonshire Travellers' Accommodation Needs Study (GTAA), published January 2017, provide a robust assessment of need? Has it taken into account need identified in previous needs assessments? Have any changes in the numbers of gypsies and travellers resident in the District since the previous assessment been justified?***

2.3.1 DDC considers the 2017 GTAA study to be a comprehensive and robust evidence base to local plan policy and is in line with national policy and guidance, including that issued after the GTAA was completed.

2.3.2 The 2017 study was undertaken by Opinion Research Services (ORS). ORS have completed GTAAs covering over 120 local authorities since the changes to PPTS in 2015 and their GTAA methodology has repeatedly been found sound through local plan examinations (as stated within para. 2.1.6 above).

2.3.3 The 2017 GTAA study supersedes previous traveller and travelling showpeople accommodation needs assessments and starts with a new population baseline. As such the study does not take account of any need identified from previous assessments as this would result in double-counting of need.

2.3.4 The 2017 GTAA sought to actively engage with the gypsy, traveller and travelling showpeople communities as well as conducting desk-based research and stakeholder interviews. The full methodological approach, together with a summary of case law and policy and guidance that was taken into consideration when completing the GTAA can be found in chapters 2 and 3 of the GTAA report.

2.3.5 A total of 43 interviews were completed with gypsies, travellers and travelling showpeople living on authorised and unauthorised sites and yards across the West Northamptonshire area (Daventry, Northampton and South Northants), and this provided ORS with a good understanding of cross-boundary issues.

**4. Does the Plan take account of the need to plan for those not falling within the planning definition as required by Section 8 of the Housing Act 1985 (as amended by Section 124 of the Housing and Planning Act 2016)?**

2.4.1 As set out within the GTAA 2017 (HOU09, para. 2.8), the duty under section 8 (Housing Act, 1985, as amended, that covers the requirement for a periodical review of housing needs) stipulates that local authorities are to consider the need of people residing or resorting in the district with respect to the provision of sites on which caravans can be stationed. As stated in the GTAA, draft guidance was produced (Review of housing needs for caravans and houseboats, 2016), which provided advice on how to consider the needs identified from those that's needs differ from a settled community. The draft guidance set out how government wished for local authorities to complete these assessments, which is the same way that the GTAA process is completed. Therefore, the housing needs of gypsy and traveller households who do not meet the planning definition of a traveller will form a subset of the wider need arising from households residing in caravans and will need to be considered as part of the wider housing needs of the area through the Strategic Housing Market Assessment (SHMA) or Housing, Economic Development Needs Assessment (HEDNA). This is also consistent with the new NPPF (2019, para. 61) which states '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)'

**5. Is the assumption in the GTAA that 10% of unknown households would meet the definition of a gypsy or traveller in the PPTS, appropriate and justified by evidence?**

2.5.1 At the time of the West Northamptonshire GTAA (2017, HOU09), based on data from 1,500 interviews completed by ORS since changes to PPTS in 2015, it was suggested that 10% of unknown need should be considered and addressed through a criteria-based Local Plan Policy (para. 3.29).

2.5.2 It should be noted that since the West Northamptonshire GTAA (2017, HOU09) ORS have now completed approximately 3,500 interviews and this figure has risen to approximately 25%. This still suggests that the majority of households that are interviewed across the country are settled and do not meet the planning definition of a traveller.

2.5.3 The ORS methodology to address the need arising from unknown households, and the recommendation that this need should be addressed through a criteria-based policy and not a specific allocation was supported by the Planning Inspector for a local plan examination for Maldon Borough Council, Essex. The Council is adopting a similar approach in this local plan and will ensure that provision will be made to meet needs

identified in the most recent GTAA.

**6. *Are the assumptions for new household formation rates justified? Is there evidence of concealed households / overcrowding on some existing sites?***

2.6.1 Paragraphs 7.6 to 7.13 of the GTAA (2017) provide the rationale in the calculation of new household formation rates taking into account the net local household growth rate per year for each local authority, and calculated using demographic evidence obtained from site surveys. The baseline for this includes all current authorised households, all households identified as in current need which includes concealed households, movement from bricks and mortar and those on waiting lists who are not currently living on a pitch or plot, and households living on tolerated unauthorised pitches/plots who do not have a current need.

2.6.2 A demographic analysis is a justified way to project future population and household growth as opposed to basing it on data from the Traveller Caravan Count as this is a count of caravans as opposed to people. The often assumed 3% increase per annum (widely used in GTAA's completed by other consultants) is identified as being unrealistic due to the lack of statistical evidence of households growing so quickly, this greatly inflates the need for additional pitches and plots. To this end, ORS has prepared a Technical Note on Household Formation and Growth Rates which supports a net household growth rate of 1.5% per annum (full paper contained within Appendix E of the GTAA 2017).

2.6.3 There is evidence of concealed households/overcrowding on an existing site for travelling showpeople. Four travelling showpeople households meet the planning definition in the District. Need for six additional plots for households that meet the planning definition is made up from four households in need of a new yard due to overcrowding and two concealed families within these households.

2.6.4 The approach within the GTAA has been accepted by Planning Inspectors in several planning appeals and local plan examinations as the most appropriate methodology to use.

**7. *Are there existing sites in the District which are not proposed to be allocated? If so, where will the families currently living on those sites relocate to if the pitches and plots are not safeguarded?***

2.7.1 There are existing sites in the District that are not allocated however these benefit from planning permission. They are not located in areas where alternative development proposals are identified in this plan or anticipated in the future within this plan or the plans of adjoining authorities.

Gypsy, Travellers and Travelling Showpeople sites:

Site name	Pitch total
Justin Park, Northampton Road, Market Harborough	22
Golden Stables, Braybrooke Road, Great Oxendon	5
Oxendon Road, Great Oxendon	1
Stowe Hill, Watling Street. Weedon	1
Fairground Yard, Station Gardens, Woodford Halse	6
West of Barby Lane, Barby	2
East of the Moorings, Barby Lane, Barby	2

**8. *Should the Plan provide for the identified need in the GTAA for 7 additional pitches for unknown households and to account for the identification of an unauthorised pitch? What is the justification for the Council's approach?***

2.8.1 As noted in paragraph 6.6.06 of the plan, the GTAA did not identify evidenced need for seven pitches for travellers meeting the definition but based on a national average of 10% this results in the 'need' for one additional pitch that has already been met.

2.8.2 As indicated in the answer to question 5 and the supporting text to the policy, the approach taken by the Council has been to include a criteria-based policy in HO9.

**9. *What is the justification for the approach of not allocating sites to meet the identified need in the GTAA for 6 additional plots for travelling showpeople?***

2.9.1 There were four travelling showpeople households identified in the 2017 GTAA that meet the planning definition, one unknown household that may meet the planning definition and no households that do not.

2.9.2 The four households which meet the planning definition form one existing private travelling showpeople site. Analysis of the household from interviews and demographics concluded the need for six additional plots, being made up of four current households requiring a new yard due to overcrowding, and from two older children in need of a pitch of their own within the next five years. Based on this the overall requirement of households that meet the planning definition is for six additional plots over the GTAA period.

2.9.3 At the time of the GTAA base date, the households had conveyed the requirement for a larger yard to meet their needs. Paragraph 7.32 (GTAA, 2017, HOU09) confirms the residents requirements and that despite seeking to source land for themselves they have been unsuccessful in locating something suitable.

2.9.4 The Council is aware that following publication of the GTAA and as the plan was being produced; the households were also considering a site outside of Daventry district. The

current position is that no alternative has yet been found, however the Council will continue to work and liaise with this group to find suitable alternative accommodation.

2.9.5 As the area the households are seeking is not limited to Daventry district it is not appropriate to allocate a site.

**10. *What is the justification for the approach in relation to transit sites and emergency stopping places?***

2.10.1 There are no transit sites or emergency stopping places within the District or the County currently although there is on-going work to identify emergency stopping place sites. All unauthorised encampments are dealt with by the Countywide Traveller Unit (CTU). Officers from the CTU advocate a managed approach to dealing with unauthorised encampments across Northamptonshire. The CTU has been very successful since its inception in 2003 but changes in neighbouring counties, including their use of emergency stopping places, appears to have impacted on the numbers experienced in the District and County. Due to the relatively low numbers of encampments in the Daventry district area, the GTAA (2017, para. 1.27) recommended that a review of the evidence base relating to unauthorised encampments should be undertaken once there is a new 3 year evidence base (from the date of the GTAA - 2017) following the changes to PPTS (2015), which will establish whether there is a need to invest in more formal transit sites or emergency stopping places (para. 7.60). However, for the short term the CTU will continue the use of short-term stopping agreements to handle encampments, as opposed to taking forward an infrastructure-based approach. A more recent GTAA completed for North Northamptonshire recognised the forthcoming local government reorganisation that is due to take place in Northamptonshire with the creation of 2 new unitary authorities. It also recommended that a review of transit need should be completed across both unitary authorities to coincide with the re-organisation.

**11. *Is Policy HO9 positively prepared and are the criteria for sites to come forward justified, effective and consistent with national policy? How would the Plan ensure that the necessary accommodation to meet identified needs in the JCS or the most recent GTAA comes forward if the Plan does not allocate sites?***

2.11.1 The Council considers its approach is in accordance with the guidance as set out in the PPTS and the NPPF.

2.11.2 The requirements, in paragraph 9 of the PPTS that plans should set out targets for gypsies and travellers and plot targets for travelling showpeople, is addressed in Table 6 of the plan.

2.11.3 Paragraph 11 (PPTS) provides that criteria should be set to guide land supply allocations



where there is an identified need. Where there is no need, criteria-based policies should be included as a basis. The plan addresses this through a criteria-based policy.

2.11.4 The plan ensures that the necessary accommodation to meet any identified need in the most recent GTAA can come forward. This is achieved by referring to the identified need as contained within the most recent evidence base. This ensures that the policy remains up to date and can effectively respond to the changing needs of gypsies, travellers and travelling showpeople.

2.11.5 The following sites/pitches have been granted consent in the District since the GTAA was published which demonstrates that the District Council continues to deal with applications on a case by case basis;

- Golden Stables, Braybrooke Road, Great Oxendon. The stationing of three additional residential mobile homes, there were two pre-existing therefore bringing the total to five (planning ref. DA/2017/0442, allowed following appeal April 2019).
- Barby Lane, Barby. Stationing of a single residential mobile home with one pre-existing, equalling a total of two pitches (planning ref. DA/2016/1112, full approval October 2017).
- East of the Moorings, Barby Lane, Barby. Residential caravan site for one traveller family with two caravans (planning ref. DA/2017/0277, full approval July 2017).