



East Staffordshire Borough Council

Housing Strategy

Gypsy and Traveller Accommodation Needs Assessment

February 2013 Update

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Introduction

1. As a local housing authority, East Staffordshire Borough Council has a duty to assess the housing needs in its district (Housing Act 1985 Section 8), and this includes a specific duty to carry out an assessment of the accommodation needs of gypsies and travellers residing in or resorting to its district (Housing Act 2004 Section 225). This assessment forms evidence to inform the Council's Core Strategy / new Local Plan.
2. The Council's principle assessment of housing needs is contained in the Strategic Housing Market Assessment. However a specific Gypsy and Traveller Accommodation Needs Assessment reflects the specific culture of travellers:
 - their nomadic or semi-nomadic pattern of life;
 - the preference for caravan-dwelling;
 - movement between housing and caravans;
 - their presence on unauthorised encampments or developments.
3. East Staffordshire Borough Council had a Gypsy and Traveller Accommodation Needs Assessment carried out in 2007. The assessment was carried out by experts from the University of Salford and the University of Birmingham. The report was published in December 2007.¹
4. That report was carried out for five Councils in the north of Staffordshire, an area which was at that time identified for regional purposes as the North Housing Market Area of the West Midlands. As such, the report aggregated some of the evidence from across the area and drew conclusions which were not necessarily robust for East Staffordshire. The report was also based on evidence in 2006 and 2007 which is now out of date.
5. Therefore, the Council updated the assessment during 2011 and produced a draft report which it took to consultation in February 2012. Two responses to the consultation were received and all the issues raised and the Council's responses are set out in Appendix 1.

¹ North Housing Market Area Gypsy and Traveller Accommodation Needs Assessment Final report December 2007 available at www.eaststaffsbc.gov.uk/Services/Housing/Housing%20Documents/Strategy/G%20and%20T%20Accommodation%20Needs%20Assessment%202008.pdf

6. The consultation did not provide any further evidence of need for new pitches. It did identify two possible sources of potentially unidentified need - from households living in 'bricks & mortar housing' and from households living outside the Borough of East Staffordshire. However:
- The Council cannot survey households living in 'bricks & mortar housing' unless it can get in touch with those households. It has tried to engage community help to secure this, but to no avail.
 - The Council cannot survey households living outside the Borough, since that is the responsibility of the council for each district.
7. Hence the current position remains that this document includes all the current evidence of need and hence its conclusions are consistent with all the available evidence.

Summary

Table 1: GTAA 2007 – Current Situation

Accommodation	Number of sites	Estimated pitches/households
Socially rented	-	-
Transit pitches	-	-
Private sites	1	17
Unauthorised developments	-	-
Average annual encampments	8	(6 per encampment)
Showpeople sites	-	-
Housing	NA	5

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Table 2: GTAA 2011 – Current Situation

Accommodation	Number of sites	Estimated pitches/households
Socially rented	-	-
Transit pitches	-	-
Private sites	1	17 pitches
Unauthorised developments	-	-
Average annual encampments	2.5	5 per encampment
Showpeople sites	-	-
Housing	NA	5

Table 3: GTAA 2007 – Pitch Requirements

Accommodation	Estimated requirements			
	2007-2012	2012-2016	2016-2021	2021-2026
Residential pitches	11	4	5	6
Transit pitches	5	N/A	N/A	N/A
Travelling Showpeople pitches	N/A	N/A	N/A	N/A

Table 4: GTAA 2011 – Pitch Requirements

Accommodation	Estimated requirements		
	2011-12	2012-16	2016-2022
Residential pitches	0	0	0
Transit pitches	0	N/A	N/A
Travelling Showpeople pitches	N/A	N/A	N/A

Current Situation

Authorised Sites

There was and is one authorised site in East Staffordshire. This is a privately owned and managed site in Burton which is licensed for 17 caravans.

Although the 2007 GTAA refers to allowing 1.7 caravans per pitch (6.39), the Burton site accommodates one caravan per pitch and hence 17 caravans equates to 17 pitches.

The 2007 GTAA reported difficulty gaining any clear idea about occupancy levels and vacancies on private sites and that it therefore assumed all sites were at capacity (6.40).

In contrast, the Burton site was visited on several occasions during 2011 and the number of pitches that were vacant varied between 0 and 3. Also, a notable feature of the site is that it contains 7 static mobile homes, and one of these was vacant..

The variation in occupancy is evidence of movement to and from the site. This is borne out by a survey of occupiers. This survey was carried out by Council officers who visited the site and asked occupiers a number of questions in person to establish their housing needs. The questionnaire used is attached as an appendix to this report, showing the responses given - from 14 households. 2 out of the 14 respondents stated that they wanted to travel rather than being settled. 4 of the respondents said they expected to move elsewhere in the future.

Hence the site in Burton clearly serves both settled and travelling households.

Planning and unauthorised development

In 2007 there had not been any planning applications or unauthorised developments of Gypsy and Traveller sites in East Staffordshire. Since then there have been the following:

- Unauthorised development of 5 pitches at Draycott in the Clay. The Council took enforcement action in 2008, and this was upheld at appeal in April 2009. The site was occupied by 5 families and the Appeal Decision allowed them 18 months to vacate the site to avoid the adverse consequences of immediate displacement. It is now unoccupied, although it has not been reinstated. It is not known where the occupiers now live.
- An application for 2 pitches on the same site was received in October 2010 but without all the necessary information so that at the time of writing it has not become valid. It is not known where the proposed occupiers currently live.
- Unauthorised use of a site in Marchington for up to 12 caravans. Stop Notices were served in August 2011 and September 2011 and an Enforcement Notice in September 2011 had been complied with by November 2011.

- An application was received in October 2011 for a site in Yoxall to accommodate 2 caravans. The proposed occupiers currently live in Coventry.
- The Council has received enquiries about a potential location in Burton.

This activity indicates that there is interest in developing sites and recognition that the planning process needs to be followed. It appears to indicate demand, although proposals could instead be speculative development. It does not evidence definitive *need* for new pitches, but this does not preclude the proper consideration of applications.

The proposed site at Draycott in the Clay lies very close to the border with South Derbyshire district. Of relevance is the fact that, following an appeal decision in September 2011, sites have now been approved in South Derbyshire to meet all the identified need for new pitches in that district.

Unauthorised encampments

The 2007 GTAA was based on an average 8 unauthorised encampments in East Staffordshire per year.

- It did recognise that there was normally only one encampment in the Borough at any one time (8.7).
- It also recorded that there were no unauthorised encampments during the 6 months April-September 2007. It ascribed this fact, in accordance with the Council's advice, to the fact that over the previous 3-4 years, encampments had mainly been by families who wanted to remain in the locality and that the majority of these families were now on a site run by a neighbouring authority (8.14). This was a reference to a site in South Derbyshire.

In contrast, the unauthorised encampments in the borough over the 24 months to September 2011 were as follows:

Table 5: Unauthorised encampments

	Number of encampments	Details		
Oct 2009-Sept 2010	1	Feb 2010	5 caravans	Uttoxeter
Oct 2010 – Sept 2011	4	Nov 2010	5 caravans	Uttoxeter
		Dec 2010	5 caravans	Uttoxeter
		Feb 2011	6 caravans	Burton
		Sep 2011	12 caravans	Marchington
Average	2.5 pa		5 caravans (excluding Marchington)	

Hence the number of unauthorised encampments is now far lower than the number taken account of in the 2007 GTAA.

Gypsies and Travellers in mainstream housing

The 2007 GTAA reported that it had engaged with Gypsy and Traveller households living in bricks and mortar housing within each of the North Staffordshire districts. On the basis of this operational experience it concluded it was reasonable to assume that there were 5 such households in each of East Staffordshire, Stafford and Staffordshire Moorlands. (9.9)

The Council does not have any evidence to change this assessment.

Travelling Showpeople

As in 2007, there are no known travelling showpeople in East Staffordshire, and there is no indication of need for sites.

Boat dwellers

The 2007 GTAA did not interview any boat dwellers in East Staffordshire.

The Trent & Mersey Canal runs through East Staffordshire and there are marinas at Barton and Shobnall. The Council is not aware of any unmet need for residential moorings.

Need for residential pitches

The 2007 GTAA assessed need for accommodation on a 'need where it is seen to arise' basis. (16.11). This accords with its survey findings that older children of Gypsy and Traveller households preferred to stay near their families when forming new households (16.2).

Current need for new residential pitches

In line with the 2007 GTAA, the *current* need for new pitches is assessed as follows:

Current need

- a. Temporary planning permissions which will end over the assessment period.
In 2007 this was none, and this remains the case.
- b. Allowance for family growth over the assessment period.
In line with the 2007 GTAA the need arising from sites and the need arising from housing are assessed separately.

2007 GTAA

New households forming on sites

Finding: Analysis of the pan-district survey showed that the number of individuals requiring their own accommodation in the next 5 years from authorised sites was the equivalent of 33% of respondents.

Assumptions: treating all individuals as requiring separate accommodation will probably over-state need as there may be some inter-marrying within the Study Area of individuals, and there may have been some over claiming. From local advice and what seems reasonable for the area we have adjusted these figures by 7.5% (i.e. 1 in 7.5 people will form a household with another individual in the area) therefore new households will be equivalent to 92.5% of such individuals. 97% of new households require their own accommodation and need a pitch, all are assumed to want to stay in the Study Area.

Calculation for East Staffordshire: 33% grossed to total current population (number of households) on sites = 33% of 17 = 5.6 households/pitches. 97% of 5.6 families = 5.4 families minus 7.5% = 5.0 households.

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New households forming on sites

Finding: The 2011 survey of East Staffordshire site occupants reveals no concealed households (households who have been unable to find separate accommodation), and no individuals who will require separate accommodation within the foreseeable future.

Calculation: There is no need for new pitches to accommodate new households forming on the East Staffordshire site.

New households forming in housing

Finding: The analysis of the survey showed that the number of individuals requiring their own accommodation in the next 5 years from bricks and mortar accommodation was the equivalent of 14% of respondents.

Assumptions: treating all individuals as requiring separate accommodation will probably over-state need as there may be some inter-marrying within the Study Area of individuals, and there may have been some over claiming. As above we have adjusted these figures by 7.5% therefore new households will be equivalent to 92.5% of such individuals

Calculation for East Staffordshire: 14% of known housed population (5 households) = 14% of 5 minus 7.5% = 0.65 households = 1 household

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- c. Need for authorised pitches from families on unauthorised developments. In 2007 there were no families living on unauthorised developments in East Staffordshire, and this remains the case.

- d. Allowance for net movement over the assessment period between sites and housing.

2007 GTAA

Movement between sites and housing

Finding: 17% of respondents on authorised sites expressed an interest in moving to a house in the Study Area

Assumption: All will move to a house

Calculation for East Staffordshire: 17% grossed to population = 17% of 17 = 2.9 families/households.

Finding: 7% of families/households in bricks and mortar families expressed an interest in a site place in the Study Area

Assumption: All will move from housing to sites if pitches are available

Calculation for East Staffordshire: 7% of assumed bricks and mortar population of 5 = 0.35 families/households.

Result: Net reduction in need for 2 pitches

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GTAA 2011

Movement between sites and housing

Finding: None of the households on the Burton site expressed a desire to move to mainstream housing

Finding: 7% of families/households in bricks and mortar families expressed an interest in a site place in the Study Area

Assumption: All will move from housing to sites if pitches are available

Calculation for East Staffordshire: 7% of assumed bricks and mortar population = 0.35 families/households = 0 households

Result: No net need

- e. Allowance for net movement over the assessment period between the Study Area and elsewhere.

The 2007 GTAA took the view that the number of Gypsies and Travellers arriving from elsewhere will probably be balanced by those Gypsies and Travellers who move on from an area and leave vacancies. (16.8)

- f. Allowance for potential closure of existing sites.

It was not and is not expected that the site in Burton will close.

- g. Potential need for residential pitches in the area from families on unauthorised encampments.

In line with the GTAA this is a two stage process; the number of families involved in unauthorised encampments is calculated, and then the number requiring residential pitches.

2007 GTAA

Families involved in unauthorised encampments

Findings: Encampments in 2006 were broadly reflective of previous years.

Assumptions: Information from officers indicated that the vast majority of encampments were thought to be either new or regular visitors to the area, as opposed to groups moving between areas within the Study Area. Assumes this to be 90% of encampments.

The average encampment size during 2006 was 7 caravans. The survey showed an average of 1.2 caravans per household. There was an average of 6 families on each encampment.

It was felt by frontline workers that a number of families who feature on unauthorised encampments are repeat encampments over the study period (i.e. the local authority would be visited a number of times during the calendar year by the same family) this was felt to be the case in 25% of encampments.

Calculation for East Staffordshire: 90% of encampments during 2006 multiplied by average encampment size = 90% of 8 times 6 = 43.2 families minus 25% = 32.4 families.

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GTAA 2011

Families involved in unauthorised encampments

Finding: There have been an average 2.5 encampments per year over the last 24 months.

This includes the encampment at Marchington in August-September 2011. However the occupiers of that encampment reported that they did not want to settle locally.

Other encampments have been an average of 5 caravans, implying 4 families. These are known to be repeat encampments by the same group.

Calculation for East Staffordshire: 4 families

2007 GTAA

Need for residential pitches from unauthorised encampments

Finding: 20% of households on unauthorised encampments were interested in moving to a residential pitch in the Study Area.

Assumptions: 20% assumed about accurate due to information on family ties and place of birth.

This is treated as a single year element rather than a 'flow' of new families each year. Other households on unauthorised encampments should be incorporated into other GTAA's.

Calculation for East Staffordshire: 20% of households involved in unauthorised encampment = 20% of 32.4 = 6.5 households/pitches

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GTAA 2011

Need for residential pitches from unauthorised encampments

Finding: The occupiers of the recent Marchington encampment reported that they did not want to settle locally. The other group which visits East Staffordshire does so occasionally and spends most of the time outside of the Borough.

Assumptions: It is understood that this group was seeking a permanent residential site. However it is reasonable to conclude that if there is a need for new pitches for this group, the need arises and should be met outside of East Staffordshire.

Calculation for East Staffordshire: Unauthorised encampments do not indicate a need for new pitches in East Staffordshire.

Pitch supply

- h. Vacant pitches over the assessment period.
As previously mentioned, the 2007 GTAA assumed no vacant pitches on private sites. In contrast, it is known that there are frequently vacant pitches on the Burton site.
- i. Unused pitches, which are to be brought back into use over the assessment period.
There were and are none.

- j. Known planned site developments.
There are no currently approved developments.

Conclusion

Table 6: 2007 GTAA – Current need for new residential pitches

Current need for new residential pitches	
New households forming on sites:	5
New households forming in housing:	1
Households moving to mainstream housing:	(2)
Unauthorised encampments	7
Total need	11
Pitch supply	0
New pitches needed	11

Table 7: GTAA 2011 – Current need for new residential pitches

Current need for new residential pitches	
New households forming on sites:	0
New households forming in housing:	1
Households moving to mainstream housing:	0
Unauthorised encampments	0
Total need	1
Pitch supply	1
New pitches needed	0

Future need for new residential pitches

The 2007 GTAA calculated newly arising need every 5 years over the period 2012-2026.

2007 GTAA

Permanent residential accommodation need over the periods 2012-2026

The current shortage of sites and pitches for Gypsies and Travellers means that it is difficult to predict trends in living arrangements once GTAA's across the country have been implemented in the form of nationally increased site/pitch provision.

There is no means of knowing how Gypsies and Travellers will decide to live in the next decade. There may be an increase in smaller households, moves into bricks and mortar housing may be more common or household formation may happen at a later age.

However, in order to take a strategic view, it is important to be able to plan for the longer-term. Therefore, in order to balance the complexity of issues with a need to plan for the longer term we have used an assumed rate of household growth of 3% a year compound as applied to the projected number of pitches which should be available by 2011. This figure is also quoted in the recent CLG report. All households on sites are assumed to require pitches.

Calculation for East Staffordshire:

2012-16: 3% x 28 pitches x 5 years = 4 pitches

2016-21: 3% x 32 pitches x 5 years = 5 pitches

2021-26: 3% x 37 pitches x 5 years = 6 pitches

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Hence future need was calculated on an assumed universal and elementary basis, rather than based on specific information about future household formation in East Staffordshire.

Moreover, Government guidance recommends that for Gypsies and Travellers it is probably unrealistic to try and forecast need for up to 15 years ahead, as is recommended within the Strategic Housing Market Assessment guidance for the rest of the community. It recommends instead that the most accurate projections possible covering the next 5-10 years should be made.² Hence this is the timeframe considered by the updated assessment.

GTAA 2011

Permanent residential accommodation needed over the period 2012-2022

The main need for new pitches arises from older children wanting to form new households.

The survey of Burton site occupiers reveals the following children in residence on the site:

- 6 children aged under 5
- 2 children aged 5-10
- 0 children aged 11-16

It is therefore clear that there is very little scope for new household formation by 2022. Two children will reach adulthood by that date. They are of an age now at which they will not yet know whether, when they are an adult, they will want to live in a caravan in East Staffordshire. If they do, it is likely given turnover on the Burton site that there will be space for them.

There is therefore no evidence of newly arising need for pitches in East Staffordshire over the years to 2022.

² Gypsy and Traveller Accommodation Needs Assessment – Guidance, Department for Communities and Local Government, October 2007. Paragraph 94

Need for transit pitches

The 2007 GTAA calculated the number of transit pitches currently needed across the whole of the North Staffordshire study area. It then distributed those pitches between districts based on the prevalence of unauthorised encampments.

2007 GTAA

Need for transit provision

Finding: 53% of households on unauthorised encampments were interested in using a transit pitch/authorised stopping place in the Study Area.

Assumptions: 53% assumed about accurate due to information provided by respondents on unauthorised encampments about expected length of stay (short-term); reasons for stay (stop-over, family, work); and, the reported preferences from the survey.

Calculation for the study area: 53% of households involved in unauthorised encampment = 53% of 158 = 84 households/pitches.

Assumptions: By taking into account that the main travelling months are, generally speaking, between April-October it seems reasonable to assume that the vast majority of this travelling will be done within this 6 month period. If a transit pitch has an upper time limit of stay of 4 weeks this means that one 10 pitch transit site during the summer will have the capacity to cater for around 60 of these households.

Therefore, it is estimated that the provision of around 24 transit pitches will provide the capacity required to cater for the households identified as in need of transit accommodation. These pitches should be distributed across the Study Area and a larger number developed in authorities which experience the greatest number of encampments.

Calculation for East Staffordshire: 8 unauthorised encampments out of 39.
 $8 / 39 \times 24 = 5$ pitches

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Hence the 2007 GTAA did not specifically look at the need in East Staffordshire. It looked at the whole of the North Staffordshire study area, and then assumed the result held good in each district. This is despite the fact it found that only 22% of travelling households were likely to move between districts within the study area (Table 46).

It is more appropriate to calculate the need for transit pitches in East Staffordshire on the basis of unauthorised encampments in East Staffordshire.

GTAA 2011

Need for transit provision

There have been an average 2.5 unauthorised encampments in East Staffordshire per year over the last 24 months. This is not sufficient demand to justify a transit site.

These unauthorised encampments have principally involved a single group and it is understood that this group was seeking a permanent residential site.

Hence there is no need for new transit pitches in East Staffordshire.

Conclusion

The evidence available to the Council does not indicate a need for additional residential pitches in East Staffordshire.

In comparison the 2007 GTAA calculated an indicative need for 26 new pitches. The reasons for the difference are:

- Use of survey information from East Staffordshire rather than from the whole of North Staffordshire to identify current need
- Fewer unauthorised encampments over the last 2 years
- Allowance for the observed level of pitch vacancies in East Staffordshire
- Use of survey information from East Staffordshire rather than national assumptions to identify future need
- Assessment for a shorter timescale in line with Government guidance

Likewise the evidence available does not indicate a need for new transit pitches in East Staffordshire.

In comparison the 2007 GTAA calculated an indicative need for 5 pitches. The reasons for the difference are:

- Fewer unauthorised encampments over the last 2 years
- Use of specific information about the one group which frequents the borough rather than data from the whole of North Staffordshire

The late West Midlands Regional Planning Body agreed that new pitches need only be provided in East Staffordshire to meet need arising in the Borough – hence that there was no need for East Staffordshire to accommodate need arising elsewhere.³

Hence there is currently no evidenced need for new pitches in East Staffordshire.

The Council wishes to express its thanks to the residents of the Haven Caravan Site in Burton for answering survey questions.

³ West Midlands Regional Spatial Strategy Phase 3 Revision, Interim Policy Statements and Policy Recommendations, West Midlands Regional Assembly, March 2010.

Appendix 1: 2012 Consultation Responses

<p>1. The conclusion that there is no need for further pitches is erroneous, short-sighted and flies in the face of the self-evident need demonstrated in the 2007 GTAA, which was more realistic and robust.</p>	<p>1. The Council's conclusion follows an updating of the GTAA in the light of more recent evidence. The Council is confident that the updating was robust. The Council identified flaws in the methodology used by the 2007 GTAA which made its conclusions for East Staffordshire less robust.</p>
<p>2. Moreover as my clients planning application itself evidences, there remains an unmet need in this area for which there is no delivery mechanism in place.</p>	<p>2. This is a reference to an incomplete planning application received by East Staffordshire Borough Council in October 2010 for a site to accommodate 1 or 2 families in Draycott in the Clay.</p> <p>a. That application refers to a 2009 enforcement appeal in respect of the same site. The appeal sought permission for around 10 caravans to accommodate 5 named families, although at the time of the appeal the site was occupied by 2 small touring caravans.</p> <p>b. In its response to the appeal the Council recognised the need for additional gypsy sites identified by the 2007 GTAA.</p> <p>c. The appeal Inspector accepted that the 2007 GTAA indicated a need for pitches and that the prospective occupiers were "a cohesive group who wish to settle on their own land". He claimed it was "not disputed that local families had been forced to seek accommodation in South Derbyshire" and that "it was acknowledged that, if the occupants had to leave the appeal site, finding an alternative site may be difficult, with the only options being unauthorised sites or roadside camping." He dismissed the appeal on the grounds that the site was not acceptable but in view of the above issues he allowed 18 months for compliance with the enforcement notice.</p> <p>d. The Council has updated the GTAA so that the 2007 GTAA is now obsolete.</p> <p>e. The current application is for 1 or 2 families. Hence it is not an application for the 5 named families described at the time as "a cohesive group".</p>

	<ul style="list-style-type: none"> f. No evidence has been found that families from East Staffordshire have been forced to seek accommodation in South Derbyshire. The Council is not responsible for assessing need in South Derbyshire and the Council has not received any evidence from South Derbyshire District Council or other sources of such families who need accommodation in East Staffordshire. g. The Council understands that the 5 named families were recently living in Leicestershire rather than in East Staffordshire. The Council has not been provided with any evidence that they still need to live in East Staffordshire. h. No further evidence of need has been submitted with the current application. i. Hence the planning application does not demonstrate a current unmet need.
<p>3. The use of vacancies on sites as a source of turnover – this has been discredited as a source of supply in the Panel reports of the South East and North West. Caravan Count data also indicates that the vacancy levels fluctuate, and there is no evidence presented to indicate that these are permanent vacancies. In fact, having spoken to a Haven resident, it appears that one vacancy arose very recently, on 20th February 2012, but prior to that there were none. It is not anticipated that this vacancy will remain so for long. Any other changes in occupancy reflect the travelling patterns of residents who use the site as their main base – i.e. their permanent base from which to travel.</p>	<p>3. By definition, site vacancies will not be permanent – they do indeed fluctuate. The only currently identified need in East Staffordshire is for one <i>new household forming in housing</i>. This is not an immediate/emergency need and it is therefore reasonable to allow that the new household will form as and when a vacancy becomes available.</p>
<p>4. Another issue with the Haven is that the GTAA update states that there are 17 pitches on the site, including 7 static caravans. In fact, most of the static caravans are used by ‘settled’ people, not Gypsy and Traveller families, and there are in fact only 7 Traveller households/pitches on The Haven at the moment, representing a decrease in provision.</p>	<p>4. The GTAA does not rely on pitches occupied by static caravans becoming available. Fewer Traveller households means less scope for new household formation, supporting the GTAA findings.</p>

<p>5. Community interviewers were not used to update the assessment, and there does not appear to have been any involvement from agencies that routinely work with Gypsies and Travellers. It is appreciated that many of these services, such as the Traveller Education Services, are being reduced, but if that has been a factor such circumstances should be explained.</p>	<p>5. The Council carried out the assessment itself and did not encounter difficulty interviewing households on the approved site. The Council has consulted with the Traveller Education Service but they did not identify any households within East Staffordshire. The Council would welcome evidence from within the community.</p>
<p>6. One of Derbyshire Gypsy Liaison Group volunteers lives locally to East Staffordshire, and is aware of at least 6 housed Gypsy/Traveller households in the Burton on Trent area, though there may well be more. There is also at least one household in Uttoxeter.</p>	<p>6. In the absence of better information the updated GTAA relied on the 2007 GTAA which referred to 5 housed households within East Staffordshire. The Council is keen for housed households to be surveyed to identify any need for pitches. We have asked DGLG for help with doing this, but this has not yet borne fruit. Without further evidence the Council has no option but to rely on the 2007 GTAA.</p>
<p>7. The records of unauthorised encampments only cover a 2 year period, and does not include information since 2007 when the original GTAA took place.</p>	<p>7. The GTAA will now refer to unauthorised encampments over the last 3 years which the Council believes to be an appropriate timescale.</p>
<p>8. A GTAA or update should ideally include survey work covering a whole year, to note seasonal patterns and would allow interview with people on unauthorised sites. The GTAA update instead largely discounts any need arising from this source.</p>	<p>8. The survey of the approved site was carried out over several months and the Council believes it included all resident Traveller households. There are no known unauthorised sites in East Staffordshire.</p>
<p>9. As set out on pages 9 and 10 of the update, there have been several planning applications in the District over the past few years. It is not appropriate to simply dismiss this source of need.</p>	<p>9. The evidence provided by these applications is as follows:</p> <ul style="list-style-type: none"> a. Unauthorised development of 5 pitches at Draycott in the Clay. See 2 above. b. Application for 2 pitches on the same site. See 2 above. c. Unauthorised use of a site in Marchington for up to 12 caravans. There was no appeal against enforcement and hence no submission of evidence. Has been taken into account as an unauthorised encampment. d. Application for a site in Yoxall. The applicant lives in Nuneaton & Bedworth district and has not demonstrated a need to live in East Staffordshire. e. Enquiries about a potential location in Burton; nothing further has transpired.

<p>10. The 2007 GTAA misreported the number of planning applications in the District, and this has not been corrected in the update. For example, the following application and resulting site:</p> <ul style="list-style-type: none"> • PA/19514/006 which was given conditional approval 24.3.05.... <p>In addition, the following applications were from Gypsy/Traveller applicants:</p> <ul style="list-style-type: none"> • PA/06889/005 which was refused on 11.04.01... • PA/15922/081 – Refused on 18.06.01... • PA/07591/005 refused 12.10.99... <p>There may of course be other applications that we are not aware of, and I have not researched the planning history of the land these applications were on to know if there were any appeals or subsequent applications, but they should be investigated.</p>	<p>10. The 2007 GTAA has now been superseded and hence is obsolete. This said:</p> <ol style="list-style-type: none"> a. The first mentioned application was approved in June 2004 and so the need was met. b. The other applications were all some years before the 2007 GTAA and were presumably omitted for this reason. c. The updated GTAA listed all applications since 2007 which the Council believes is a sufficient timescale.
<p>11. Have the sites on the Register of Caravan Site Licences been double-checked? It could be that there are other Gypsy/Traveller sites that have been overlooked in the survey that we are not aware of either.</p>	<p>11. The Council has checked the register and does not believe any of the other sites are Gypsy or Traveller sites.</p>
<p>12. There are other issues with the GTAA, in that it covers only a small area and there are clearly cross boundary issues that have not been thoroughly investigated. It is known that there are family groups who regularly cross from Staffordshire into Derbyshire and vice versa. Cross-boundary working is important so that the needs of these families are met and it is not simply assumed that their needs have been met elsewhere and then dismissed.</p>	<p>12. The Council is not responsible for assessing need in other districts but is keen to work with neighbouring councils. It has consulted neighbouring councils but those councils have not provided any evidence of households with a need to live in East Staffordshire or of need which cannot be met within their districts. South Derbyshire District Council has however indicated its desire to discuss implications.</p>

Appendix 2: Site Survey Questionnaire

Questions		<i>Your answer (Totals of answers given)</i>	<i>The answer of anyone else in your household who intends to move out</i>
1. Are there any children in your household?		5 YES / 9 NO	No answers given
If Yes,	(a) What are their ages?	6 children aged under 5 2 children aged 5-10	No answers given
2. Do you have enough space for your household?		13 YES / 1 NO	No answers given
If No:	(a) Do you need a pitch with room for another trailer?	1 YES / 0 NO	No answers given
	(b) Does anyone in your household want to move to their own separate pitch?	0 YES / 0 NO	No answers given
3. Do you mainly want to be settled or to be travelling?		12 Settled / 2 Travelling	No answers given
4. Is Burton the place you want to be at the moment?		13 YES / 1 NO	No answers given
If No:	(a) Where is it that you would like to be?	No answer given	No answers given
5. Do you expect to move elsewhere in future?		4 YES / 10 NO	No answers given
If Yes:	(a) In what year do you expect to move?	2011, 2012 2 x no answer	No answers given
	(b) Where would you like to move to?	Burton, Stoke 2 x no answer	No answers given
6. Would you like to and be able to buy your own site if you could get planning permission?		5 YES / 9 NO	No answers given
If No:	(a) What facilities do you need on a site?	6 x no additional facilities 1 a shower or bath 7 x no answer	No answers given