



Best Practice for assessing the accommodation needs of Gypsies and Travellers

This document provides a good practice guide, seeking to improve the undertaking and application of assessments for Gypsy and Traveller accommodation needs, formally referred to until recently as Gypsy and Traveller Needs Assessments (GTANAs). It brings together the knowledge and expertise of planners, barristers, lawyers and community organisations to create a valuable tool in approaching future assessments and understanding existing ones.

Interested individuals and organisations (credited at end) created the guide in response to widespread and ongoing concerns about the methodology and practice of many recent assessments. A number of GTANAs have, in our collective view, consistently failed to appropriately engage with the Gypsy and Traveller community or adhere to existing guidance. As a result, many assessments have not provided an accurate picture of accommodation need and therefore not serving a key purpose in informing Local Authorities about future provision.

The purpose of this guide is to highlight, with our collective experience in this field, notable actions to encourage and to avoid, with a view to preventing poor practices and to promote more positive examples we have observed. We hope that the guide is given careful consideration by organisations undertaking assessments, Planning Inspectors, Local Authorities and others with an interest in, or responsibility for, Gypsy and Traveller accommodation issues.

A Good Assessment – Things to do

Have strong community member engagement – Whether involved directly in the undertaking of surveys, such as community enumerators, or carrying out support work identifying potentially unknown Gypsy and Travellers, including those on roadside or in bricks and mortar. This ideally would involve paid community involvement with all interview or advisory work attracting the same rate as staff employed by Local Authority or contracted private company.

Assessments done **with** Gypsies and Travellers, not **to** them - Ensuring that their full expertise in their community is core to the exercise at the centre. Without their involvement, assessments are likely to be inaccurate. In particular these involve undercounting and a failure to fully comprehend household patterns. Local authorities, particularly those without their own liaison officers, may have limited information or be poorly informed about their local Gypsy and Traveller communities.

Use resources already available - Those working directly with Gypsies and Travellers, such as Gypsy and Traveller Liaison officers, Traveller health and education workers, and planning enforcement officers typically have access to community networks and can be used to spread information on forthcoming assessments as well as allay anxieties. As such they should be fully involved in an advisory capacity from the beginning of any assessment exercise.

Build trust and explain purpose – Those undertaking assessments need to clearly explain the purpose of the study and demonstrate honest intent. It will also be important to be clear that any provision will take time to be delivered, to ensure more complete and comprehensive responses. This task represents another advantage to community member engagement in assessments and therefore assists in delivering this information and helps build 'good-will' at a local area level.

Focused, straightforward questionnaires – Ask no more questions than are required to establish key need figures. Use clear understandable language, ideally formulated with community member consultation and strongly consider use of pictorial images alongside written questions to help with completion.

Use checks and balances – Data provided requires the confidence of both the Local Authority and community members. This is best gained through regular dialogue during the survey period and as the report is produced. Best practice assessments undertaken in the past have typically had access to a community advisory group who help with access to community members as well as offering views on the coverage of interviews and recommendations made for accommodation.

Ask questions about site location – One legitimate question to include on a questionnaire regards seeking opinions about the location and design of potential future sites. This directly relates to accommodation and provides the Local Authority with relevant information about how best to meet need identified within surveys.

Clarify the need – In terms of future accommodation planning by Local Authorities it is useful not simply to seek to identify a total figure of ‘need’ but to specify how this can be met i.e. a division between public and private (whether rented or self-owned) pitches. It is also useful to record cases where someone clearly identifies their overall preference for housing (and what type, i.e. bungalow) or alternative forms of provision such as negotiated stopping and cooperatively owned ‘community land trust’ provision. Access to this data assists the Local Authority in identifying the clear nature of need in their area.

Include the assessment within the Strategic Housing Market Assessment (SHMA) - In order to be both cost-effective and avoid the need to duplicate resources and demands on respondents assessments should be carried out in tandem with SHMAs as part of the same study. This will identify the needs both of those ethnic Gypsies and Travellers who come within the August 2015 Traveller definition and those who don’t, but who have a cultural tradition of caravan dwelling, and/or an aversion to living in bricks and mortar.

Build on previous work and the criticisms of it - In most cases this is the second, or in some cases the third, GTANA or related accommodation assessment which has taken place in a particular locality. It is likely that considerable resources from Local Authorities and Gypsy and Traveller organisations will have been engaged in the earlier assessments. Some assessments were subject to processes which appraised their methodologies and the soundness of the conclusions. As such, it is important that the findings and recommendations/critiques of earlier GTANAs are built on and earlier mistakes avoided. Comparison with previous surveys provides a reality check and helps to build up a body of reliable and valid evidence.

Carefully consider survey timings – It is recommended to carry out surveys at times of year when the return rate will be highest and results consequently most representative. Undertaking surveys solely during the summer months is best avoided as there is a greater chance of missing respondents who would come under the definition of travelling and therefore underestimating actual need. Surveys should be carried out over a 9-12 month period to mitigate the risks of misrepresenting need. With fairs operating from April to October, very careful consideration must be taken of those not present during the surveys but who should be reflected in the need figures.

A Poor assessment - Things to avoid

Rely only on existing data - It is critical that assessments are not a desktop exercise alone. An assessment relying exclusively or heavily on a desktop assessment will be insufficient and flawed. 'Desktop' methodologies tend to focus mainly on the bi-annual caravan count, which provides a questionably accurate snapshot of residents in caravans. There **must** be field work including the interviewing of community members, to gain an accurate picture of need.

Miss out bricks and mortar – Those living in a bricks and mortar represent a significant proportion of the Gypsy and Traveller community in almost any Local Authority so **must** be factored in. Whilst not all may wish for site provision this has been explored through actual interviews. Many Gypsies and Travellers were forced into housing because of the shortage of suitable accommodation. The shortage of social housing means there isn't available housing stock for their sons and daughters, who often retain a cultural preference for living on suitable sites.

Misunderstand low response rates – There is a tendency for some people not to identify as Gypsies and Travellers for a range of reasons, including prejudice and this may often lead to an undercount of need. Just because some need is not easily found does not mean that it is not there. Crucially, utilising community interviewers will lead to higher response rates and a more representative study.

Make simple or formulaic assumptions about turnover – 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.

Presume all existing supply is usable – Factoring all empty plots into supply figures is a flawed methodology. The details of plots need to be assessed before their inclusion. Issues such as poor site management or families holding plots vacant for future needs while someone is working away, mean that some plots are in practice not available and can't be considered to be part of current supply.

Ask irrelevant or leading questions – Questionnaires should focus on accommodation need, not address wider matters of repairs or satisfaction with general local services, although questions about family members with disabilities etc. can be relevant to assessing need and how many other people may need to live on a site to provide support. It is important that when questions are asked about the issue of Travelling, community members can detail everything relevant to their travelling patterns. As this factor of the survey will support

decisions being reached on 'Gypsy status' it is critically important to avoid having only a narrow set of potentially incomplete answers available for selection in the questionnaire.

Ignore roadside encampments – Roadside encampments represent a clear manifestation of need, likely to relate to that Local Authority's responsibilities. Whilst it is possible those on the camp do not wish for accommodation in that area, this must not be presumed and requires surveying to confirm. Needs assessments are of Gypsies and Travellers residing in **or resorting to** an area, i.e. including those coming to an area for work and as such these households **must** be included in assessments.

Ignore or underplay New Travellers – It is critical to avoid ignoring New Travellers when undertaking a count, noting that they can meet the planning definition of 'Gypsies and Travellers' contained in *Planning policy for traveller sites*, August 2015. Equally, the need of mobile Gypsies and Travellers will be underplayed if there is a focus exclusively on authorised private and public sites; those sites which are easiest to identify.

Miscalculating migration – There is a tendency for assessments in areas of high need, high constraint i.e. through planning regulation/Green Belt/limited space, to take account of out-migration. Similarly in areas with low identified need and fewer constraints on provision there is a tendency in assessments to ignore the pressures for in-migration.

Remember useful Policy Guidance

There are clearly articulated principles in *Planning policy for traveller sites*, and the DCLG Guidance *Gypsy and Traveller Accommodation Needs Assessments*, October 2007. Whilst subject to change, when considering all these dos and don'ts Local Authorities should continue to refer to a number of core principles of proven value:

- Early and effective engagement with Gypsies and Travellers themselves, their representative bodies and local support groups (*Planning policy for traveller sites* para 7a). *Gypsy and Traveller Accommodation Needs Assessments* para 46 recommends including a Gypsy and Traveller representative on the Steering Group, and paras 49 and 50 provide helpful guidance on how to approach stakeholder engagement;
- Ongoing engagement over the life of the development plan (*Planning policy for traveller sites* para 7b);
- Collaborative working on a wider geographic basis than the individual Council area between local planning authorities (*Planning policy for traveller sites* para 10, *Gypsy and Traveller Accommodation Needs Assessments* paras 40 - 45);
- How to address some specific challenges of carrying out Gypsy and Traveller assessments, including the need to take account of the needs of housed Gypsies and Travellers (*Gypsy and Traveller Accommodation Needs Assessments* paras 30 – 34, 63, 70, 82); and

- Making full use of existing data sources, but they may not be enough (*Gypsy and Traveller Accommodation Needs Assessments* paras 62 – 65, 67 – 69, 73 – 77).

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