



Town & Country Planning Act 1990

(As Amended)

The Town and Country Planning (Hearings Procedure) (England) Rules 2000 (SI 2000: No. 1626)

Appeal by Mr Patrick McDonagh against (1) the refusal by Wiltshire Council of an application for the use of land for the stationing of caravans for residential purposes and the erection of a stable; (2) the refusal by Wiltshire Council of an application for the use of land for the stationing of caravans for residential purposes and the erection of a stable; and (3) by Mrs Bridget McDonagh against the refusal by Wiltshire Council of an application for the removal and replacement of Condition 2 of planning permission reference APP/Y3940/W/15/3006435.

**Plots 1-3, Plot 5 and Plot 6 at The Poplars Residential Park, Poplar Tree Lane,
Southwick, BA14 9NB**

**Planning Inspectorate References: (1) APP/Y3940/W/19/3229836; (2)
APP/Y3940/W/19/3229843; and (3) APP/Y3940/W/19/3229845**

LPA References: (1) 18/07022/FUL; (2) 18/07033/FUL; and (3) 18/07423/VAR

GPS References: (1) 17_905; (2) 17_905A; and (3) 17_905B

Statement of

**Steve Jarman
Opinion Research Services Ltd.
May 2022**

Background

1. My name is Steve Jarman and I am Head of Traveller Assessments for Opinion Research Services (ORS) where I have worked since May 2013. Previous to that I had over eighteen years' experience in Local Government at both a senior and managerial level. This covered all aspects of consultation, engagement, research and information, and policy development, across the full range of local government and other public-sector services. Formerly as manager of Cardiff Council's own in-house research consultancy I had responsibility for developing and implementing a wide range of consultation and community engagement initiatives. I have extensive experience of project managing large-scale strategic and sensitive consultation exercises, the implementation of qualitative and quantitative research methods, evidence-based policy development, and data analysis and interpretation.
2. As a qualified Planner, I have a sound knowledge of the policy and legislative frameworks that relate to local government and the wider public sector, as well as in-depth knowledge of policy, legislation and case law relating the Travelling Community.
3. I have a BSc in City and Regional Planning from Cardiff University (1994), a Post Graduate Diploma in Town Planning from Cardiff University (1996), and a Post Graduate Certificate in Sustainable Leadership from the University of Wales Institute Cardiff (2010).
4. I lead on the Gypsy and Traveller Accommodation Assessment (GTAA) Portfolio for ORS and have been responsible for GTAAs covering over 140 local authorities in England and Wales. Since changes to Planning Policy for Traveller Sites (PPTS) in 2015, ORS are working on or have completed studies for a large number of local authorities across the UK including Wiltshire, Bedford, Central Bedfordshire, Milton Keynes, Luton, Northamptonshire (7 local authorities), the majority (8) local authorities in Hertfordshire, Kent (4 local authorities), Buckinghamshire (4 local authorities), Cambridgeshire Region (7 local authorities), Cheshire (4 local authorities), Dorset (7 local authorities), Essex Region (14 local authorities), Gloucestershire (6 local authorities), the majority (9) local authorities in Hampshire, Leicestershire (8 local authorities), 20 London Boroughs, Oxfordshire (5 local authorities), South West England (4 local authorities), the majority (8) local authorities in Surrey, and West Sussex (6 local authorities) - making ORS the largest provider of such studies in the country
5. I am instructed by Wiltshire Council to support the Council's case in these appeals. My evidence deals specifically with the accommodation needs for Gypsies, Travellers, and Travelling Showpeople in Wiltshire, and the new Wiltshire Gypsy and Traveller Accommodation Assessment (GTAA) that was published in March 2022.

Introduction

6. This is a conjoined appeal by Mr Patrick McDonagh and Mrs Bridget McDonagh against (1) the refusal by Wiltshire Council of an application for the use of land for the stationing of caravans for residential purposes and the erection of a stable; (2) the refusal by Wiltshire Council of an application for the use of land for the stationing of caravans for residential purposes and the erection of a stable; and (3) the refusal by Wiltshire Council of an application for the removal and replacement of Condition 2 of planning permission reference APP/Y3940/W/15/3006435 at Plots 1-3, Plot 5 and Plot 6 at The Poplars Residential Park, Poplar Tree Lane, Southwick, BA14 9NB.
7. I have been asked by the Council to provide the views of ORS on key issues relating to the assessment of need for Gypsy and Traveller pitches and Travelling Showpeople plots in Wiltshire that have been raised in the Second Updated Statement of Need prepared by Green Planning Studio Ltd (GPS) dated April 2022. This addresses issues relating to the Wiltshire GTAA that was published in March 2022.
8. In March 2019 ORS were commissioned by Wiltshire Council to complete a new GTAA. The GTAA Report was published in June 2020.
9. In 2021 ORS were commissioned by Wiltshire Council to complete an update of the June 2020 GTAA to support the preparation of their new Local Plan. The new GTAA Report was completed in mid- March 2022 and constitutes Appendix 1 to the Council's Supplementary Statement, which is submitted separately by Mr Henning Totz (Senior Planning Officer, Spatial Planning).
10. The 2020 and 2022 assessments are both robust and comprehensive evidence-based assessments of the current and future need for accommodation for Travellers in Wiltshire who meet, or may meet, the current planning definition of a Gypsy, Traveller or Travelling Showperson as set out in Annex 1 of PPTS (2015).
11. It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the PPTS planning definition. However, this assessment was also completed, and the GTAA report provides advice on how the Council should seek to address accommodation need arising from households that did not meet the current planning definition of a Traveller through separate Local Plan Policies. This is consistent with the requirements of the revised NPPF (2021).
12. 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, Castle Point, Central Bedfordshire, Chelmsford, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Hart, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
13. An Appeal Decision for a Hearing in Central Bedfordshire (**Appendix 1**) that was issued in March 2020 concluded:

...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAA's 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.
14. 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 (**Appendix 2**). 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.’

15. The overall approach used by ORS was also considered at a Local Plan Examination in Maldon, Essex, in January 2017, and the Inspectors Report published on 29 June 2017 (**Appendix 3**) included the following comments:

143. The methodology of the new GTAA incorporates both a desk-based review and a survey of travelling communities. The former has drawn on a range of data including from the census, site records and caravan counts. The survey has been undertaken through face-to-face interviews with travellers. Rather than sample interviews, the general approach has been to attempt to interview all travellers in the district – those occupying pitches and those living in bricks-and-mortar accommodation. To that end, visits were made between January and September 2016, during the ‘non-travelling season’, avoiding July and August and days of known national or local events. Those undertaking the fieldwork have re-visited households multiple times when householders were either not present or not available to be interviewed at the time of calling. All of this is appropriate and, on the face of it, it appears that all reasonable endeavours have been undertaken to capture fully the views of the travelling community in the district.

Key Issues Relating to the GTAA

16. In the Second Updated Statement of Need (the Statement) dated April 2022, GPS set out a number of reasons why they are of the opinion that the 2022 Wiltshire GTAA underestimates need for Traveller pitches. These include:
- » The GTAA fieldwork and the revised PPTS planning definition of a Gypsy, Traveller and Travelling Showperson (Paragraphs 1-79).
 - » The 2011 Census and the MHCLG Traveller Caravan Count (Paragraphs 80-98).
 - » Survey Data (Paragraphs 111-128).
 - » Demand (Paragraphs 129-197).
 - » Concealed and Doubled-Up Households (Paragraphs 198-218).
 - » Hidden Need (Paragraphs 221-235).
 - » Emerging Need (Paragraphs 238-261).
 - » Supply (Paragraphs 262-268).
17. The 2022 Wiltshire GTAA Report contains detailed background and methodology chapters that set out the approach that was undertaken to complete the GTAA.
18. This Appeal Statement will seek to address the specific issues that GPS have raised in the Statement in relation to the 2022 GTAA.

Scrutiny of the ORS GTAA Methodology

19. ORS note 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 including in Bedford, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Hart, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
20. See Paragraph 13 for comments made in an Appeal Decision for a Hearing in Central Bedfordshire (**Appendix 1**) that was issued in March 2020. At this appeal, the Appellants were also represented by GPS and very similar issues were raised in relation to the GTAA.
21. In addition, specific elements of the ORS GTAA methodology have been supported by Planning Inspectors in various Decision Notices.
22. The Planning Inspector for an appeal in Chelmsford (APP/W1525/A/14/2226970) agreed with the approach taken by ORS when identifying concealed or doubled-up households. See Paragraphs 25-26 in **Appendix 4**.
23. The approach taken by ORS to new household formation and the use of a base rate of 1.50% has been supported by Planning Inspectors in a number of Decision Notices. In relation to a Decision Notice 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. The Inspector disagreed and accepted that a figure of 1.50% was justified. The Inspectors conclusions can be found in Paragraph 23 in **Appendix 5**.
24. Another relevant decision 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 disagreed and accepted that the [ORS] figures used in the GTAA were more appropriate and derived from local demographic evidence. The Inspectors conclusions can be found in Paragraph 29 in **Appendix 6**.

The Planning Definition of a Gypsy, Traveller and Travelling Showperson

25. The most recent version of PPTS that was published in August 2015 contained a revised definition of a Gypsy, Traveller and Travelling Showperson for planning purposes. In addition, the previous Housing Definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016) through the removal of sections 225 and 226 of the 2004 Act. As such the only current definition of Gypsies, Travellers and Travelling Showpeople for the purposes of the planning system and the assessment of housing need is that which is found in Annex 1 of PPTS (2015).
26. A GTAA now only needs to formally assess the needs of households that meet or may meet (undetermined households) the planning definition set out in PPTS (2015). However, ORS acknowledge that there are still current and future housing needs arising from those households that do not meet the planning definition. Therefore, our GTAA's do complete this assessment and include advice on how local authorities should seek to address these needs through alternative planning mechanisms and through separate Local Plan Policies. This approach is consistent with the revised NPPF that was published in July 2021.
27. This approach was considered by the Inspector in a recent planning appeal in Central Bedfordshire. The Decision Notice (**Appendix 1**) that was issued in March 2020 concluded (in relation to the 2019 NPPF):

29. Nevertheless, the Appellant makes a criticism of the assumption in the GTAA that the housing needs of ethnic gypsies who do not meet the 'planning' definition of travellers, as set out in PPTS, should be included in an assessment of the wider planning needs of the area. It is claimed that the wording of the Framework, in paragraph 61 and footnote 25, indicates that all travellers, whether meeting the 'planning definition' or not should be included in the GTAA and the consequent calculation of the number of pitches required.

30. The Framework, in paragraph 61, notes that housing needs for different groups, (including travellers) should be assessed and reflected in planning policies. Footnote 25 refers to travellers and states '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.' Annex 1 of PPTS notes that for the purposes of that policy document '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.'

31. 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. At the Hearing, the appellant made the point that, whatever the definition, the appeal site could help to provide accommodation for either group. However, for the purposes of considering whether the Council has a 5-year supply of sites for travellers that meet the PPTS definition in Annex 1, I consider that, for this case, it should be assumed that the numbers for 'non-travelling' gypsies will be provided for in other parts of the LP that the criticism of the GTAA in this respect is unfounded.

28. Chapter 2 of the GTAA Report clearly sets out the Case Law and supporting sections from Decision Notices that have led to the approach ORS have taken to applying the planning definition to Gypsy, Traveller and

Travelling Showperson households. Confidential legal advice obtained by other clients of ORS have also supported the approach that is being taken by ORS.

29. The implication of these rulings in terms of applying the current planning definition is that it will **only include those households with household members 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 it will not include those who travel for purposes other than work – such as holidays and visiting friends or relatives. It will also **not cover** those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477 – **Appendix 7**).

30. This approach was reinforced in a Decision Notice for an appeal in King's Lynn and West Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) (**Appendix 8**) 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 of travel for the purposes of making or seeking their livelihood.

31. The ORS household interview includes a structured set of 11 questions to record information about the travelling characteristics of household members. When the household interviews were completed the outcomes from all of 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. Very careful consideration was also given to respondents who state that they travel to visit fairs. In these circumstances ORS Researchers asked additional questions to probe whether these visits involved any elements of work either at the fairs themselves, or when travelling to and from the fairs.

32. Households that need to be considered in the GTAA fall under one of 3 classifications that will determine whether their housing needs will need to be assessed in the GTAA. 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 (undetermined households).

33. As set out in the 2022 GTAA Report the methodology used to update the assessment of need was a hybrid approach. This is clearly set out in Paragraphs 3.10 – 3.18 in the GTAA Report. In summary, this included a review of the site and yard baseline in Wiltshire in relation to any new sites and yards; a review of the outcomes of the interviews that were completed to support the 2020 GTAA; and a review of the outcomes of consultation that that was undertaken to inform the Gypsies and Travellers DPD.

34. Paragraph 39 in the Statement contends that the household interview questions that were used to update the 2020 GTAA are different from the ones that were used for the fieldwork to support the 2020 GTAA. The questions are the same, however there has recently been a requirement to make the formatting of the questions in Appendix E accessible and this is why the 2 sets of questions look different.

35. Paragraph 40 in the Statement contends that ORS interviewers are not qualified to ask the questions in Section F of the household interview or to make an assessment of whether or not households meet the planning definition.
36. Firstly, the interviews were completed by experienced ORS Researchers who are accredited under the Interviewer Quality Control Scheme (IQCS) and the Market Research Society (MRS) Code of Conduct. IQCS requires research companies to adhere to a set of benchmark market research industry standards. These cover the recruitment, training and appraisal of fieldwork staff, and the implementation of various administrative and validation procedures to maintain the quality and accuracy of data collected. The Researchers used for the 2020 Wiltshire GTAA and the 2022 GTAA Update have completed over 3,000 interviews with Traveller households since the changes to PPTS in 2015.
37. Secondly, it should be made very clear that it is not the Researchers who determine the status of households against the PPTS planning definition. The assessment of households against the planning definition is made by experienced senior staff at ORS following the completion of the fieldwork, including myself as a qualified Planner with sound knowledge of the policy and legislative frameworks that relate to local government and the wider public sector, as well as in-depth knowledge of the policy, legislation and case law relating the Travelling Community.
38. Paragraphs 45-46 in the statement of Need contend that interviewers follow an arbitrary approach when completing household interviews and that the outcomes of the questions on travelling may not be asked and probed in a consistent manner. All of the interviews in Wiltshire were completed by ORS' most experienced Fieldwork Researchers who have been responsible for over two thirds of all the interviews completed by ORS since changes to PPTS in 2015.

Undetermined Households

39. As well as calculating need for interviewed households that meet the planning definition, the needs of the households where an interview was unable to be completed (either due to refusal to be interviewed or households that are not present during the fieldwork period) were assessed as part of the GTAA where they were believed to be Gypsies and Travellers who may meet the planning definition.
40. There is no guidance that sets out how the needs of these households should be addressed. However, an approach was taken that sought a best estimate of current and future need from these households. The estimate sought to identify current need from any pitches known to be temporary or unauthorised, and to estimate future need through new household formation. For the latter, the ORS national household formation rate of 1.50% was applied as the demographics of residents were unknown.
41. The GTAA Report sets out that it is likely that only a proportion of need from undetermined households will need to be addressed in a specific Gypsy and Traveller Local Plan Policy alongside need from households that met the planning definition, and that the majority of this need should be addressed alongside need from households that did not meet the planning definition. This is consistent with the revised NPPF (2021).
42. ORS have now completed over 5,000 interviews with Gypsies and Travellers on sites across England and the proportion of households that meet the planning definition is approximately 30%, suggesting that the majority of households that are interviewed across the country are settled and do not meet the planning

definition of a Traveller. Consideration was also be given to the locally derived new household formation rate (54%) as it were higher than the ORS national rate.

43. The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon Borough Council, Essex. In his Report that was published on 29th June 2017 (**Appendix 3**) 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.

44. Paragraphs 50-55 in the Statement of Need question the approach used to determine need from undetermined households and that no evidence has been provided to support the assertions that are set out in the paragraphs above. However, this approach is now clearly set out in Paragraph 62 of the NPPF (2021).
45. Paragraphs 54-55 contend that a higher % figure should have been used in the 2022 GTAA when seeking to address need from undetermined households. Paragraph 1.13 in the 2022 GTAA clearly sets out the implications for the Council of considering both the ORS national figure of 30% and the locally derived figure of 54% and the potential impact this would have on addressing undetermined need.
46. Paragraphs 57-63 in the Statement of Need set out a number of historic examples in other local authorities where it has been claimed by GPS that ORS have failed to apply the planning definition correctly based on the outcomes of household interviews, or where households have been classified as unknown/undetermined where it had not been possible to complete interviews - but GPS provide no examples in relation to the Wiltshire GTAA.
47. In response to this there are often occasions where the information provided during household interviews differs from evidence provided in Witness Statements at Planning Appeals. ORS have a clear view about this. Planning agents need to be confident that their clients will meet the planning definition before deciding to submit and support an appeal against the refusal of planning permission or against an enforcement notice. This means that it was highly likely that appellants at the appeals referred to in these examples would seek to provide evidence claiming to meet the planning definition. ORS have attended many appeals where very doubtful evidence has been provided by appellants on their travelling patterns and reasons for travelling that directly contradict evidence provided during household interviews. Therefore, ORS are of the opinion that evidence presented at appeals is already heavily weighted towards households that will meet the planning definition – despite what may have been provided during household interviews to support a GTAA.

Households that do not meet the Planning Definition

48. Households who do not travel for work purposes, or for seeking work, no longer meet the planning definition of a Traveller. However, Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equality Act 2010. Provisions set out in the Housing and Planning Act (2016) 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 Guidance related to this section of the Act sets out how the Government would want local authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be considered as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. The approach followed when completing the Wiltshire GTAA is now supported by the revised NPPF (2021).
49. 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.’*
50. The Housing Delivery Test Measurement Rule Book (MHCLG – July 2018) also confirms that the assessed needs for Travellers that meet the planning definition are not included in the overall OAN and that *where applicable, the housing requirement for Gypsies and Travellers under the Planning Policy for Traveller Sites (PPTS) will be added to the [latest adopted] housing requirement... and that Plan-making authorities should inform MHCLG of their housing requirement for Gypsies and Travellers under the PPTS through the annual Housing Delivery Test DELTA data collection.*
51. Paragraphs 65-75 in the Statement argue that the need from households that do not meet the planning definition of a Traveller should be met in the same way as the need from households that do meet the planning definition. Paragraph 72-74 include quotes given by me that sets out that need is decreasing as a result of the planning definition and that Councils are not providing sites to meet identified need. I agree with this statement but contend that it has no impact of the process undertaken to complete a GTAA as need from both groups are fully assessed in the same way. Paragraph 74 contends that ORS agree that it is wrong to separate need between these 2 groups. This is not the case as it can clearly be seen in the GTAA that both groups are assessed separately and recommendations are given in the GTAA relating to how these needs should be addressed. Finally Paragraph 75 again contends that ORS are not suitably qualified to make an assessment of the planning status of Travellers. My response to this is included earlier in this Statement.
52. Finally, in response to claims made in Paragraphs 76-79 in the Statement it is very clear from reading the revised NPPF, The Housing Delivery Test Measurement Rule Book and the PPTS, that the needs of households that meet the planning definition should be addressed under the PPTS, and that the needs of households that do not meet the planning definition should be addressed as part of the wider housing needs of an area. This is supported in the appeal decision from Central Bedfordshire referred to in **Appendix 1**.

53. In addition, ORS agree with the views of the Inspector in the Appeal Decision that is included in Paragraph 77 of the Statement and agree that they are consistent with the approach taken by ORS when completing GTAA's. The decision in Paragraph 77 sets out that a GTAA should consider the needs of all Travellers – the approach taken by ORS.

Traveller Caravan Count and Census Data

54. Paragraphs 80-98 in the Statement set out 2 forms of national secondary data that it is felt should be considered when preparing a GTAA and that these are the 2011 Census and the ODPM/DCLG Traveller Caravan Count – the latter of which has been superseded twice now by the MHCLG Traveller Caravan Count, and more recently the Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count.
55. Whilst both of these national datasets do provide some useful information to support trend analysis at a national and regional level, they are not considered by ORS as robust datasets to support the local assessment of housing need and are not the basis for the conclusions of the GTAA (see paragraphs 4.7-4.8 of the GTAA Report).
56. Therefore, ORS completely agree with the Statement that sets out a critique of the Traveller Caravan Count.
57. In addition, data from the 2011 Census has been used in the preparation of the ORS Technical Note that has been used to determine national levels of population and household growth (**Appendix 9**) and also as an indicator of potential numbers of households living in bricks and mortar. It should also be noted that this data is now over 10 years old and that a new Census was completed in 2021 that is expected to provide a more inclusive set of data on the Travelling Community through the inclusion of a new response option of Roma when asking for an individual's ethnicity.

Assessment of Need in Wiltshire

58. Paragraph 110 in the Statement contends that GPS has identified several flaws in the methodology used by ORS to complete the 2022 Wiltshire GTAA, and that these have resulted in an underestimate of need.
59. I will try to respond to the issues that have been raised in the Statement with the methodology used to complete the previous GTAA and show how these have been addressed in the new GTAA.

Survey Data

60. Paragraphs 111-120 in the Statement question the hybrid approach that was used to update the site and yard baseline for the 2022 GTAA. Paragraph 115 sets out that there appears to be a lack of transparency in that the GTAA does not record the sites where new interviews have been completed, and which sites relied on interviews that were completed for the 2020 GTAA. It also questions whether some sites may have been deliberately excluded from the 2022 GTAA in order to reduce the levels of need. I can confirm that to the best of my and the Council's knowledge all new sites in Wiltshire that were not included in to 2020 GTAA have been accurately included in the 2022 GTAA, and that all efforts were made to ensure that the household data was accurately recorded.
61. Paragraph 121 in the Statement again questions which sites had new household interviews and which sites used data from 2020 interviews, and that the GTAA does not record this information. Overall, a total of 232 interviews or proxy interviews were completed with Travellers for the 2022 GTAA. I can confirm that new interviews were completed between January 2021 and March 2022 that covered a total of 34 Gypsy and Traveller pitches and 2 Travelling Showmen's plots. The new interviews identified a total of 60 Gypsy and Traveller households and 3 Travelling Showmen's households.
62. Paragraphs 122-123 in the Statement question the household interview response rates for the 2022 GTAA. When vacant or unimplemented pitches and pitches not occupied by Travellers are taken into consideration there was a very robust 78% response rate for Gypsies and Travellers and a 100% response rate for Travelling Showmen.
63. Paragraphs 124-128 in the Statement set out a number of issues in relation to the inadequacy of the interview technique and lack of wider stakeholder engagement during the completion of the 2022 GTAA, and also the over-reliance of oral information from households completing the site and yard interviews – but again provides no local evidence to support these claims.
64. I have already addressed issues relating to the interview technique and the experience of the Researchers used by ORS to complete the fieldwork to support the GTAA. In addition, it is an accepted data collection principle that primary data is more reliable than secondary data when trying to identify characteristics and needs of individual households.
65. The 2022 GTAA also included extensive engagement both with Officers from the Council – including those responsible for managing the public sites and the waiting lists for these site. In addition, ORS made contact with several planning agents who represent members of the Travelling Community in Wiltshire, along with advocacy organisations including Friends, Families and Travellers, and the Chaplain for Gypsy Travellers from the Church of England who is based in Salisbury.
66. Therefore, ORS disagree with claims made by GPS in Paragraph 128 of the Need Statement that *The limitations of the ORS approach are a consideration when assessing whether the GTAA is a robust assessment.*

Demand

67. Paragraphs 129-197 in the Statement set out GPS' understanding of demand for pitches in Wiltshire based on the 2022 GTAA site and yard baseline.
68. This section of the Statement questions the site and yard baseline that was used for the GTAA and GPS make a number of claims where they contend that the site and yard baseline is incorrect. I have spoken at length with the Council about these claims and we both agree that the baseline is correct and I respond to claims made about each site in the table below.
69. Whilst there is now agreement in relation to a number of sites that were questioned in the previous Statement of Need and responded to in my Statement dated March 2022, the Statement goes on to list a number of sites where there is still disagreement on the number of pitches.
70. Prior to this, the Statement makes a couple of more general points in relation to demand. Paragraph 135 comments on pitches that were found not to be occupied by Travellers and pitches identified as either not existing/under construction/unimplemented. For the purposes of the GTAA none of these pitches have been included as either demand or supply. Paragraph 136 questions how the GTAA has dealt with pitches that were found to be vacant and contends that this may have been a result of households being away travelling at the time of the fieldwork. This is not the case as the vacant status of all of these pitches has been confirmed with other households living on these sites.

Site	GTAA Pitches	GPS Pitches	Notes
Christian Place	3	2	GPS correctly identify that the total number of pitches applied for in 2000 is three. This was permitted at appeal. An additional caravan was permitted at appeal taking the total number of units on site to 4. In para 145 GPS assert that 4 caravans equate to 2 pitches. This is clearly incorrect as the site already had permission for 3 pitches before the additional caravan on one of the pitches was permitted.
Former Glenville Nurseries	11	11	The missing permission referred to in para 134 is 14/05671/FUL and was approved in September 2014. The total number of permitted pitches for this site is therefore 11, and the GTAA is consistent with this.
Frampton Farm	15	15	The following permissions have been granted at this site for 15 pitches, in response to para 150 in the GPS Statement of Need: • N/08/02114/FUL (1 pitch permanent). • N/10/00907/FUL (4 pitches permanent). • N/11/00974/FUL (4 pitches permanent). • N/12/00593/FUL (2 pitches permanent).

			• 15/04420/FUL (4 pitches permanent).
Sunnyside	6	2	Permission was granted for 2 additional pitches taking the total permitted pitches at this site to 4. GPS are therefore correct in that at the 2022 base date, permission existed for 4 pitches. All 4 pitches have now been implemented. A further complication is that the site changed ownership in 2020 and is currently subject to the application cited in the statement (PL/2021/09453 – 2 pitches, which is still to be determined). These pitches are occupied and unauthorised and all 6 are included in the 2022 GTAA
Land opposite 6 Hawkridge Road	2	2	Application W/14/08114/FUL was for permanent permission for a single pitch that had been subject of temporary permissions since 2008. The subsequent approval of 16/11414/FUL added an additional permanent pitch to the site. This takes the total to 2 pitches as included in the 2022 GTAA.
Melbourne View	4	6	The situation surrounding the planning history and occupation of Melbourne View is complex. 14/08266/VAR states at Condition 3 that no more than 15 caravans shall be stationed on site, of which no more than 3 shall be statics or mobile homes, and no more than 12 should be tourers. Condition 9 then makes it clear that <i>the four touring caravans hereby granted permission to be stored on site shall not be occupied at any time for residential or holiday purposes.</i> This takes the permitted number of liveable units to 3 statics and 8 tourers = 11 units. This explains the total of 11 shown in the 2020 GTAA which ORS now accept is incorrect as not every unit would constitute a pitch. During the fieldwork for the 2022 GTAA a total of 4 households were living on the site and all were interviewed. They confirmed that it was a family site and that they are the permanent occupiers. Other family members

			do come and go but none live on the site permanently. Therefore ORS and the Council have concluded that the site should be recorded as having 4 pitches in the absence of any specific number in the planning permission.
Hillview	0	1	The 2022 GTAA records this site as a bricks and mortar site occupied by ethnic travellers. The planning application reference is 15/08191/FUL.
Land at Four Oaks	11	12	Land at Four Oaks benefits from two permissions for permanent pitches: N/96/01778/FUL permitted for 6 pitches. N/12/01291 for 5 pitches. The 2022 GTAA states 12 pitches in Figure 6 but the site only benefits from permission for 11 pitches. The applications are available on the website.
Land at Greenfield View	2		This was an error in the 2020 GTAA. N/02/01853/S73A permits siting of two gypsy mobile homes, four caravans and two amenity blocks. The permission is available on the Council's website.
Land to the rear of The Paddock (now The Paddock, Startley)	5		Land to the Rear of the Paddock has five pitches: 18/03524/FUL (approved at appeal APP/Y3940/W/19/3225487 = 3 pitches), in addition to 2 pitches previously permitted here under reference number APP/J3910/A/07/2014910. The site is listed in the 2022 GTSS as The Paddock, Startley.
The Stables (now The Lodge, Calcutt)	5		This site is now called The Lodge, Calcutt in the 2022 GTAA, and has recently received planning permission for an additional 4 pitches (20/03216/FUL). The original permission here was for 1 pitch 14/03393/FUL.
Avonview/Hillbilly Acre (unauthorised)	1	2	Following discussions with the site owner it has been confirmed that there is only one permanently occupied pitch on this site. The owners relatives do occasionally stay over for short period of time when visiting.
			GPS contend that all tolerated sites in the GTAA should be included as unauthorised. The Council and ORS disagree with this.
Blandford Road (tolerated)	0	1	It has been confirmed by the Councils Enforcement Team that this site has been in existence for more than 10 years and that no enforcement action has been taken. It is therefore considered by the Council to be tolerated for planning purposes.

Hatt Hill (tolerated)	0	2	It has been confirmed by the Councils Enforcement Team that this site has been in existence for more than 10 years and that no enforcement action has been taken. It is therefore considered by the Council to be tolerated for planning purposes.
Viny Ridge (tolerated)	0	1	It has been confirmed by the Councils Enforcement Team that this site has been in existence for more than 10 years and that no enforcement action has been taken. It is therefore considered by the Council to be tolerated for planning purposes.
9 Berhills Lane (unauthorised)	0	6	There is no record of unauthorised development or encampments at this site. It does not exist anymore.
New Road, Bromham (unauthorised)	3	1	This site is included in the 2022 GTAA as The Paddock, Bromham.
Stonehenge Byway (unauthorised)	0	2	The Council's Highway Enforcement Officer confirmed in February 2021, that "Stonehenge Byway 12 is an encampment not an unauthorised site, so they do not own the land and it's a public right of way. Also, they are now gone as we [the Council] closed the road due to covid."

Concealed and Doubled-Up Households

71. Paragraphs 198-218 in the Statement question the approach taken in the GTAA to addressing need from concealed or doubled-up households or single adults.
72. GPS regularly raise issues in relation to the identification and inclusion in the GTAA of concealed or doubled-up households or single adults. A perceived failure to identify these households is a common criticism by GPS of GTAA work and ORS have revised our methodology in recent years to seek to address these issues.
73. ORS agree with the points made by GPS in Paragraphs 198-199 and also view single adults as concealed or doubled-up as it is common across the Travelling Community for adult children and other relatives or friends to be forced to live with parents, other family members or friends due to a lack of available pitches. As well as being components of need in their own right, ORS recognise in our methodology that they also contribute to future need through new household formation.
74. As far as the 2022 GTAA is concerned, for the sake of simplicity it treats concealed and doubled-up households or adults in the same way by seeking to identify how many separate households or individuals living on a pitch are in need of a pitch or plot of their own, or whether they are living in this way by choice. Whether a household or individual is concealed or doubled-up they still count as a component of current need in the own right.
75. ORS use the data from the household interviews to identify any concealed or doubled-up households or single adults. This is done through a series of questions (A12, C1 and C2) that ask directly how many households are living on a pitch or plot; how many of these adult households are in need of a pitch or their own; and how many teenage children will be in need of a pitch of their own in the next 5 years. This also allows us to identify situations where several generations of an extended family are occupying a single pitch or plot through choice. We do not make any assumptions based solely on the demographics of households living on a pitch or plot about additional pitch needs as there are many instances where none are needed. The determination of need is certainly not undertaken by the interviewers as contended by GPS in Paragraph 202 of the Statement of Need. It is robustly completed by senior staff during the analysis of the household interviews.
76. This approach was supported by the Planning Inspector for an appeal in Chelmsford (APP/W1525/A/14/2226970) (**Appendix 4**) where he concluded:
- 26. The terms “doubling-up” and “concealed households” both refer to actual or potential households which are currently living on other gypsy and traveller sites. The GTAA does not count a household as needing another pitch if it is found during interviewing that there is not a wish for another pitch. I find this approach to be reasonable and consistent with that of engagement with the traveller community in assessing need.*
77. GPS correctly set out the levels of need that are identified in the GTAA in Paragraph 206 of the Statement of Need. They do not however refer to the displaced in-migration that is also included in the GTAA Report tables. As set out previously in my Statement I disagree with the additional concealed/doubled-up households that GPS identify in Paragraphs 209-214 in the Statement.
78. Finally, GPS content that the GTAA should seek to extrapolate need from concealed or doubled-up households or single adults from those households where it was not possible to complete an interview – the undetermined households. Given that there can be significant difference between the needs of Traveller households ORS are of the view that extrapolating need can often lead to an over-estimate of need. However,

Paragraph 7.41 in the GTAA does make it clear that the Council will also have to be aware of any additional need from concealed or doubled-up households and from teenagers from undetermined households.

Hidden Need

79. Paragraphs 221-235 in the Statement question the approach taken in the GTAA to identifying hidden need from bricks and mortar households.
80. As set out in Paragraph 3.19-3.21 in the 2022 GTAA Report, ORS went to great lengths to seek to identify households to interview who were living in bricks and mortar and may have a need to move to a site and gave these households every opportunity to make their views known.
81. Following these efforts, it was possible to complete interviews with a total of 12 Gypsy and Traveller households and with 1 Travelling Showmen's household living in bricks and mortar – this is consistent with Paragraph 1.4 in the GTAA which also list 13 interviews with households in bricks and mortar. The interviews also identified 4 teenagers within these households as being in need of a pitch of their own.
82. GPS go on in Paragraph 230 of the Statement that there should be a calculated allowance for households living in bricks and mortar. ORS disagree with this approach as our evidence suggests that the figures put forward by GPS are a significant over-estimate of need.
83. In response to this ORS are in the process of finalising a detailed *Technical Note* to set out evidence to demonstrate that the vast majority of Travellers who live in bricks and mortar do so through choice and have no wish to move to a site.
84. The Technical Note consider a range of issues based upon the known and estimated statistics for Gypsy and Traveller households in bricks and mortar and also the work ORS have undertaken over the last 15 years in relation to GTAA's. The main issues that have been considered are:
- » How large is the Gypsy and Traveller population in England and what proportion live in bricks and mortar.
 - » How does the number of households in bricks and mortar vary by local authority.
 - » Is it possible to estimate the number of households who wish to move from bricks and mortar by a simple statistical means in any local authority.
 - » How do PPTS definitional issues around Gypsies and Travellers affect the need; and
 - » What case studies around the country tell us about the needs of Gypsies and Travellers in bricks and mortar.
85. In terms of households in bricks and mortar, there has now been at least 15 years of detailed research completed by ORS with Gypsies and Travellers as part of the GTAA process and there is no evidence whatsoever to justify that there are a high number of households living in bricks and mortar both meeting the planning definition of a Traveller and seeking to move to sites. A wide range of methods have been used across the country to identify households who wish to move to sites and few (the majority being in Inner London), if any, have ever shown high numbers who wish to move to sites, and few of these households meet the planning definition of a Traveller.
86. The emerging conclusions in the *Technical Note* are set out below and it is anticipated that it will be published later in 2022:
- » It is estimated that the current population of Gypsies and Travellers as an ethnic grouping in England is between 200,000-240,000 persons, with around 70,000-90,000 households.

Of the total households it is estimated that approximately a quarter live in caravans, with the remainder living in bricks and mortar.

- » Evidence from the 2011 Census indicates that there is no statistical link between the number of Gypsy and Traveller households who live in caravans and those who live in bricks and mortar at a local authority level. Some local authorities have large populations on sites, but few households in bricks and mortar, while the reverse applies for others. There is therefore no statistically robust mechanism available to extrapolate the need accurately and robustly for households in bricks and mortar from the size of the on-site population at a local level that is identified in the 2011 Census – and in no way in such a simple manner that is put forward by GPS in the Statement of Need.
- » For the actual local need for households in bricks and mortar the only available source of information is local evidence based upon household surveys and stakeholder engagement. Other than in London Boroughs and a small number of other urban areas, there is only evidence of very small numbers of households seeking to move to a site from bricks and mortar, with the majority of households living in bricks and mortar through choice.
- » This is supported by evidence from the last round of GTAA's that were completed in Wales under the requirements of the Housing (Wales) Act 2014. This approach in Wales included extremely detailed and binding guidance on how to undertake the GTAA, which required a thorough approach to assessing the needs of households in bricks and mortar. GTAA's were produced for all 22 local authorities in Wales, all following the same methodology, and this represents the most concerted and consistent attempt to identify need from Gypsy and Traveller households in bricks and mortar undertaken in England and Wales. Our research shows that when adjusted for the PPTS planning definition, there was a need for just 12 pitches from households living in bricks and mortar across all 22 local authorities in Wales – or an average of just 0.5 households per local authority.
- » There are 363 Local Planning Authorities in England and an estimated total of between 52,500-67,500 Gypsy and Traveller households living in bricks and mortar. When the findings from Wales are applied to England this would equate to a total need from bricks and mortar of between 893 and 1,147 pitches, or an average of between 2.5 and 3.2 households for each LPA over the course of a GTAA.

87. In addition, work undertaken to support the 2022 GTAA included a thorough and detailed review of households on the waiting list for the 3 public sites in Wiltshire. It can be assumed that a proportion of households seeking to move from bricks and mortar would join a waiting list for a public site. The 2011 Census identified a total of 168 Gypsies or Irish Travellers living in bricks and mortar in Wiltshire. The review of the 22 households on the waiting lists for public sites in January 2022 identified just 2 households living in bricks and mortar in Wiltshire.
88. As such, the emerging findings of the ORS Technical Note do not suggest that there will be much, if any, additional need arising from households living in bricks and mortar in Wiltshire, and nowhere near as high as the figure of 56 pitches put forward by GPS in Paragraph 234 in the Statement.

Emerging Need from New Household Formation

89. Paragraphs 238-261 in the Statement question whether the approach taken by ORS to estimate future need from new household formation is robust.
90. As an overview, ORS produced a detailed paper entitled: *Technical Note Gypsy and Traveller Household Formation and Growth Rates - September 2015* and updated it in June 2020 (**Appendix 9**) to streamline the content although the key outcomes remain the same.
91. ORS would note that this paper has been reviewed by Professor Ludi Simpson from the University of Manchester, who is one of the leading demographers in the country and who sits on the MHCLG expert panel to review their household projections. He provided very helpful feedback, which if anything indicates that our figures are overstating growth in the Gypsy and Traveller community. We would also note that the paper forms the basis of a peer reviewed Academic Journal Article in 'Social Research Practice' which is run by the Social Research Association. This paper was published in December 2017.
92. ORS would also note that we have spoken to Professor Philip Brown from University of Salford who was one of the authors of the Government's 2007 GTAA Guidance (and also the Regional Spatial Strategy Guidance) which stated in worked examples that a household formation rate of 3.00% should be used¹. He knows of no evidence which contradicts our findings and accepts that our evidence supersedes the previous guidance documents as the most up to date information on Gypsy and Traveller household formation rates.
93. The formation rate has also been debated and discussed with all the leading planning agents who cover Gypsy and Traveller appeals. As far as we are aware, GPS are the only organisation still seeking to challenge the work.
94. Therefore, official bodies and experts in the field of Gypsy and Traveller household and population modelling have viewed and provided feedback on ORS's work and none have provided any evidence which has required us to re-evaluate our work.
95. ORS do not intend to repeat all of the issues covered by these documents, but consider a brief overview is appropriate to set the issues in context.
96. In summary, national, and local household formation and growth rates are important components of Gypsy and Traveller Accommodation Assessments, but prior to 2013 little detailed work had been done to assess their likely scale. Prior to 2013, nationally, a net growth rate of 3.00% per annum had been commonly assumed and widely used in local assessments – even though there was actually no statistical evidence of households growing so quickly. The result was to inflate both national and local requirements for additional pitches unrealistically.
97. In 2013, data from the 2011 Census was used to publish an age profile for the Gypsy and Traveller population in England and Wales. ORS have also undertaken a significant number of GTAA's which provided us with a detailed profile of the Gypsy and Traveller population. ORS's survey data and the 2011 Census data matched each other and indicated that a 3.00% formation rate was not even remotely possible for Gypsy and Travellers. Instead, a rate of between 1.25%-1.50% was more plausible. This work was undertaken in the autumn of 2013 and first published in October 2013. From that point onwards, we consider that there has been no serious dispute about the household formation rate for Gypsies and Travellers and no meaningful evidence has been provided by anyone to contradict ORS's position.

¹ Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

98. ORS would note that these issues have been considered by Planning Inspectors. For example, at a case in Doncaster that was issued in November 2016 (Appeal Ref: APP/F4410/W/15/3133490 - **Appendix 5**) the Inspector concluded:

23. 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 1.5% but that a 2.5% 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 1.5% 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 1.5% figure is justified in the case of Doncaster.

24. Although I have taken account of the view put forward for the appellant that a higher household growth rate should be used, I consider that the main elements that are relied upon to justify this higher rate are already taken into account in ORS's research and the Council's application of this work to the local area. Notwithstanding this if it is found during the course of the next few years that growth rates are not as expected provision can be adjusted accordingly.

99. Another case (APP/P1615/W/16/3148326 – **Appendix 10**) issued in August 2017 in the Forest of Dean the Inspector concluded at paragraphs 41 and 42 that:

41. The parties also differ in terms of household growth rates. The GTAA was undertaken by Opinion Research Services (ORS), part of Swansea University. ORS's research indicates that the average annual household growth rate is in the order of 1.50%. The GTAA adjusts this figure according to local demographics, such that within Cotswold District the rate is 1.90%, whilst in the Forest of Dean it is 1.40%. ORS prepared a technical note in 2015 to justify this rate. This note has been subject to peer review and was published in Social Research Practice in 2016/17.

42. The appellant's position in respect of household growth rates has changed during the course of the appeal from an initial figure of 3.00% to 1.90% in the most recent submission. Many of the elements that the appellant considers contribute to the higher household formation rate have been taken into account in the ORS research. There remains a difference between the parties as to the life expectancy of gypsies and travellers. The appellant submits that life expectancy at birth is 89 years, whilst ORS believe 72 years to be a more realistic figure. ORS rely on research from the University of Sheffield which found that life expectancy amongst gypsies and travellers was about 10-12 years less than for average. ORS found that using a life expectancy of 72 the results were consistent with the 2011 census. I therefore prefer the evidence of ORS which has been subject to greater scrutiny.

100. Another decision was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526 – **Appendix 6**) 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.

101. ORS think that these Decision Notices are a very fair summary of the situation in that ORS have not only thought of every point raised by GPS in the Statement of Need, but also a number of points that they have yet to consider.
102. Paragraphs 7.13-7.14 in the 2022 GTAA sets out that new household formation for households that met the planning definition of a Traveller used a rate of 1.85% based on the local demographics of households, and for households that did not meet the planning definition a rate of 1.70% has been used, also were derived from the household demographics. This resulted in future formation of 41 households over the period 2027-38 for households that met the planning definition, and future formation of 29 over the period 2027-38 for households that did not meet the planning definition. In addition, the GTAA identified a future formation of 17 arising from undetermined households. Therefore, for Gypsies and Travellers the 2022 GTAA identified a total of 87 new households to form for the period to 2038.
103. Please also note that overall new household formation has 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.
104. As such, ORS would contend that the approach taken to estimate new household formation over the 2022 GTAA period should be seen as robust and is significantly higher than the figure of 70 set out in Paragraph 260 of the GPS Statement of Need.

Conclusion on Need for Gypsies and Travellers in Wiltshire

105. The ORS GTAA approach has been repeatedly assessed as robust, including through Local Plan Examinations in Bedford, Cambridge, Castle Point, Central Bedfordshire, Chelmsford, Cheltenham, Cotswold, Daventry, East Herts, Gloucester, Hart, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.

106. An Appeal Decision for a Hearing in Central Bedfordshire (**Appendix 1**) that was issued in March 2020 concluded:

...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAA's 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.

107. The GPS Statement of Need sets out a number of concerns relating to the ORS GTAA methodology in relation to a perceived under-estimate of need for accommodation for Gypsies and Travellers.

108. ORS have provided evidence to show that the PPTS (2015) planning definition of a Gypsy, Traveller and Travelling Showperson has been properly applied and that GTAA's do not now need to include a formal assessment of need for households that do not meet the planning definition. ORS do complete this assessment, however, to provide our clients with an overall picture of need for the Travelling Community – an approach now supported by the revised NPPF (2021) and provide detailed recommendation on how this need should be addressed in the 2022 GTAA.

109. ORS have significant experience in completing GTAA's and are probably the best placed consultancy in the country to assess households against the current planning definition of a Traveller based on the outcomes of robust household interviews completed by experienced Researchers.

110. ORS have provided evidence to support the site baseline that has been used for the 2022 GTAA and how the assessment correctly addresses need from concealed/double-up households.

111. ORS have demonstrated that the approach used by ORS to calculate new household formation has been consistently found to be sound by Planning Inspectors.

112. GPS contend in the Statement of Need that the 2022 GTAA is an underestimate of need for Gypsies and Travellers in Wiltshire and provide no local evidence to support these claims.

113. Therefore, ORS contend that the 2022 GTAA is an accurate evidence-based assessment of need based on in-depth interviews with households living on sites in Wiltshire.

114. Overall, taking all of these points into consideration, the overall accommodation needs for Gypsies, Travellers and Travelling Showpeople in Wiltshire that has been identified by the 2022 GTAA is accurate and robust, and in line with national policy and guidance.

115. Finally, it should be noted that the 2022 GTAA includes a full assessment of need for households living on the appeal site. This includes the 5 unauthorised pitches, need from teenagers living on the site, and need from new household formation. All of this identified need is accepted by the Council. It is not for a Planning Hearing to seek to demonstrate the robustness of the GTAA. This will be a matter for the Local Plan Inspector to determine. Therefore ORS would contend that this appeal should be considered on development management grounds only.

Appendices

Appendix 1

Central Bedfordshire Appeal Decision Notice

Appendix 2

East Hertfordshire District Plan Inspectors Report

Appendix 3

Maldon Local Plan Inspectors Report

Appendix 4

Chelmsford Appeal Decision Notice

Appendix 5

Doncaster Appeal Decision Notice

Appendix 6

Guildford Appeal Decision Notice

Appendix 7

Ashford Appeal Decision Notice

Appendix 8

King's Lynn and West Norfolk Appeal Decision Notice

Appendix 9

ORS Technical Note of Household Formation

Appendix 10

Forest of Dean Decision Notice