

Michael Bullock

Proof of Evidence

Relating to:

Land south of Chear Fen Boat Club, Twentypence Road, Cottenham, CB6 8PX

LPA Reference:

22/01703/FUL

PINS Reference:

APP/W0530/C/24/3349303

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1. Introduction

- 1.1 This proof of evidence has been prepared by Dr Michael Bullock, Director of arc4 and supplements the Particulars of Case document I authored which was submitted to PINS on 10th February 2025. I hold a BSc (Hons) and PhD in Geography, both from Lancaster University. I have over 25 years' housing research experience and I am a Member of the Market Research Society and a Member of the Chartered Institute of Housing. I prepared the 2023 South Cambridgeshire and Cambridge Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers (ANA hereafter).
- 1.2 This proof of evidence is in response to the Need Statement submitted by Green Planning Studios GPS reference 21_1161B.
- 1.3 Section 2 of this proof of evidence responds to comments by Green Planning Studio Ltd with specific reference to comments relating to:
- Determining the PPTS definition paras 5 to 7
 - List of sites paras 15 to 17
 - Survey data paras 60 to 68
 - Authorised households paras 69 to 91
 - Unauthorised households paras 92 to 117
 - Concealed households paras 118 to 127
 - Doubled up households paras 128 to 131
 - Conclusions on households living in caravans at the base date paras 132 to 134
 - Hidden need paras 135 to 146
 - Conclusions on households living in caravans at the base date paras 147 to 149
 - Emerging households /growth rate paras 150 to 175
 - Supply paras 176 to 183
 - Conclusions on need paras 184 to 191

2. Responses to the Need Statement

2.1 This section responds to specific aspects of the GPS Need Statement.

‘Determining the PPTS definition’ paras 5 to 7

2.2 The PPTS 2024 set out a revised definition for Gypsies and Travellers which updated the PPTS 2015. Both arc4 and GPS always agreed to the principal that ANAs should assess the needs for all Gypsies and Travellers who live, or wish to live, in caravans, will need to be met by the Council through the PPTS. This is a position of common ground.

‘List of sites’ paras 15 to 17

2.3 The Council considered the publication of site addresses in the ANA but were concerned about any breaches in data protection and GDPR. The site list was therefore redacted in the ANA report.

‘Survey data’ paras 60 to 68

2.4 Although the household survey was completed by the end of December 2023, the base date of the study was 31st March 2024. This was to take into account some sites were granted planning permission in early 2024 and included those referenced in the GPS Need Statement at para 88.

2.5 Regarding level of response, the ANA stated that 148 household interviews were achieved and information for 29 households was obtained from planning application data (which included data for Chear Fen). This provided data for 177 out of 288 households or 61.5%. When engaging with households, there is an initial visit by the arc4 staff (including Dr Michael Bullock) to raise awareness of the study. Interviews are then carried out by systematically visiting sites, with multiple attempts at differ times of the day including weekends to engage with households.

2.6 It is confirmed that no interviews were secured with Gypsy and Traveller households living in bricks and mortar accommodation. This is often experienced when carrying out GTAAAs and engaging with bricks and mortar households can be challenging – not least because of the fear of prejudice and people tend not to want to identify as being a Gypsy or Traveller. As part of household interviews, we ask if respondents know of anyone in bricks and mortar and are encouraged to get in touch with us. No respondents identified anyone in bricks and mortar accommodation.

2.7 Prior to GDPR, we were sometimes given contact details by councils of households in bricks and mortar, but this is no longer possible.

2.8 By way of further example, we recently asked one of our Gypsy and Traveller associates to engage with her own extended family living in bricks and mortar accommodation to contribute to a GTAA. All five households refused to be engaged.

- 2.9 Given the challenge of engaging with bricks and mortar households, the needs assessment model factors in potential need from bricks and mortar households. Para 7.16 of the GTAA explains that arc4 assumes 5.3% of households living in bricks and mortar would prefer to live on a site and this equated to a need for 4.4 pitches. The 5.3% figure is based on interviews we have successfully carried out with 348 bricks and mortar households over the course of our GTAA work since 2012).

‘Authorised households’ paras 69 to 91

- 2.10 Concern was raised by GPS over the lack of site details in the ANA which was responded to at para 2.3.
- 2.11 A specific issue was raised by GPS regarding the ANA referring to 70 authorised pitches that are not occupied by Gypsies and Travellers. This was a reasonable estimate based on site observation, discussions with local residents who raised concerns about who was living on sites and household interviews achieved on sites. The ANA took the view these pitches had been allocated for Gypsy and Traveller use and therefore part of authorised supply.
- 2.12 Regarding vacancy, we specifically ask respondents if pitches are vacant and through this identified 34 vacant pitches on sites.
- 2.13 Regarding the two sites granted permission at Moor Drove, these were included a part of authorised supply in the ANA.

‘Unauthorised households’ paras 92 to 117

- 2.14 There is one unauthorised site in South Cambridgeshire (1 pitch, not occupied); two sites with lapsed planning permission (2 pitches, 2 occupied by 2 households); and 4 sites where planning permission is pending (13 pitches, 11 occupied by 11 households, 2 vacant).
- 2.15 The total number of pitches that were not permanently authorised were 16 (13 occupied by 13 households and 3 were vacant)
- 2.16 GPS references several sites in the Chesterton Fen Area. The ANA was based on known planning records relating to land that was specifically allocated to Gypsy and Traveller use.
- 2.17 GPS suggest there are 57 unauthorised pitches but this not supported by the evidence from planning data nor site observation.

‘Concealed households’ paras 118 to 127

- 2.18 We would agree with GPS that accurately identifying concealed households is important as they are in immediate pitch need. As part of household surveys we obtain data on the number of households and residents living on sites. Through this work we can discern any concealed households who want their own pitch. The relationship between pitches and households can be complex. As an example, a large private pitch may accommodate an older couple and a married child who has a small family. The question is whether this is a concealed household? The reality is that the extended family unit wants to stay together and

so for housing needs purposes there is no additional need arising from the pitch. This type of nuanced evidence is obtained through our household surveys and we are regularly told that sites are developed for families to be together. Where some of the extended family want their own pitch, this is assessed as part of the emerging household component of the needs model.

‘Doubled-up households’ paras 128 to 131

- 2.19 arc4 have a positive relationship with GPS and over the years we have taken on board suggested revisions to questionnaires – for instance we ask whether any households are concealed, doubled up with another household or does anyone else use this pitch at their home. We would agree that if we find completely separate families living on a pitch this can constitute doubled-up household. The survey responses clearly showed that no respondent felt that their pitch was doubled-up.
- 2.20 Additionally, as part of household surveys we obtain data on the number of households and residents living on sites. Through this work we can discern any doubled up households and whether those households want their own pitch. The relationship between pitches and households can be complex. As an example, a large private pitch may accommodate an older couple and a married child who has a small family. The question is whether this is a doubled up family? The reality is that the extended family unit wants to stay together and so for housing needs purposes there is no additional need arising from the pitch. This type of nuanced evidence is obtained through our household surveys and we are regularly told that sites are developed for families to be together.

‘Conclusions on households living in caravans at the base date’ paras 132 to 134

- 2.21 Table 1 below summarises the conclusions of the ANA with the alternative assumptions posited by GPS and provides comments on why figures vary. It should also be noted that the evidence of need related to ‘travelling’ and ‘non-travelling’ Gypsies and Travellers. The overall variance is 38 households.

Table 1 Variance in baseline numbers of pitches

	arc4	GPS	Variance	Comment
Public sites	32	32	0	Agreed
Private authorised	342	255	-87	Difference of 70 due to arc4 assuming 70 authorised pitches not being used by Gypsies and Travellers. Other variation of 17 reflects GPS assumption that 50% of the 34 vacant pitches identified by arc4 are genuinely vacant.
Not authorised	16	57	41	Based on planning data of sites known to the council. GPS considers additional areas of Chesterton Fen Area to be unauthorised Gypsy and Traveller Sites. Arc4 observation and discussions local Travellers would suggest sites not being used for Gypsy and Traveller occupancy
Concealed	0	8	8	Concealed considered as part of need. Often part of extended family group. If want to move included as new household formation
Doubling up	0		0	Doubled up considered as part of need. Often part of extended family group. If want to move included as new household formation
Total	390	352	-38	GPS assumes a higher base number of households

‘Hidden need’ paras 135 to 146

- 2.22 GPS recognises hidden need as taking the form of households living in bricks and mortar accommodation who would like to move back to a pitch and out of bricks and mortar and whose current accommodation is overcrowded.
- 2.23 Deriving an estimate for Gypsy and Traveller households living in bricks and mortar housing is challenging, with only the 2011 and 2021 Census’ attempting to provide a consistent baseline position. Academics note that, “*The process of estimating the numbers of Gypsies and Travellers in Britain is a problematic one*” (Clark and Greenfields p19)”. They comment that factors including the ‘hard to reach’ nature of these ethnic minority groups, the reluctance of people to declare their heritage (out of fear of discrimination) and inadequate representation in national statistics has led to few quality datasets being produced.
- 2.24 GPS notes a range of 5 to 10% of Gypsies and Travellers in bricks and mortar in hidden need and would suggest 5% would be reasonable. The ANA applies a similar proportion and factors in a 5.3% need from households in bricks and mortar which is within this range.
- 2.25 However, arc4 maintains that establishing the baseline number of Gypsies and Travellers in bricks and mortar is challenging but the GTAA modelling does factor in an element of need from bricks and mortar households. Following on from a useful discussion with GPS, we introduced a question on our surveys which asks, ‘where were you living when you were 15?’. This attempted to explore the number

of households who had moved from bricks and mortar onto pitches. However, we are finding very few people have actually made the move from bricks and mortar dwellings and the trend is more likely to be people moving from pitches to bricks and mortar. So, regardless of trying to estimate the numbers wanting to move from bricks and mortar to a pitch, the actual flow of households is minimal.

‘Conclusions on base date figures’ paras 147 to 149

- 2.26 This adds a further 18 households to the need figures based on bricks and mortar households, compared with 4.4 in the ANA modelling.

Emerging need / in-migration /growth rate paras 150 to 175

In-migration

- 2.27 The ANA considers in- and out-migration as part of the understanding of households needing pitches. Demographic change is attributed to three factors: births, deaths and migration. As part of the ANA household survey, information on households who have moved into South Cambridgeshire and households planning to move out of the district were obtained. In-migration is an important driver of pitch need, with 19 existing households moving into the district in the past 5 years based on survey evidence. This compares with 1.6 existing households planning to move out. The ANA also considers the impact of a similar trend of in-migration over the plan period which would increase the number of households by 52 (although this was used to illustrate the potential impact of longer-term migration which can be tested in future ANAs).

Growth rates

- 2.28 The ANA considers two factors when assessing need. For the first five-year model, the analysis considers the number of people wanting to form new households. The figure established through the survey analysis, weighted to account for non-response households, was 43 households in the next 5 years. Secondly, demographic information from household surveys is used to project need over the longer term which results in an additional need for 89 pitches to 2041/42. The total emerging need is therefore 132 households and the annualised growth rate is 2.1%. This is within the range suggested by ORS, another specialist consultancy, of 1.5% to 2.5% each year. Welsh Government guidance also recommends a growth rate of between 1.5% and 3% each year.
- 2.29 GPS recommend an alternative approach which is not based on the actual empirical evidence and suggest a markedly higher growth rate which is limited to a shorter time period (to 2031) than the ANA assessment.

Supply paras 176 to 183**Outmigration**

- 2.30 The ANA provides a detailed assessment of in- and out-migration over the first five year period 2023/24 to 2027/28. Analysis also considers the potential impact of in-migration on household numbers in the longer term. It would be recommended that the impact of in and out migration is reviewed in subsequent ANAs. GPS make a valid point that the longer-term impact of migration should have included an allowance for out-migration, but this would have had a minimal impact given so few households planned to move out of the district in the short-term.

Permissions since the base date

- 2.31 The Piggery and Everetts Field (11 pitches in total) have been granted permission since the ANA base date of 31st March 2024.
- 2.32 The ANA already recognised Land East of Plot 5, Moor Drove and Land East of Plot 2, Moor Drove as authorised sites (9 pitches in total) at the base date of 31st March 2024.
- 2.33 Since the ANA base date of 31st March 2024, the number of authorised pitches has increased by 11 pitches

‘Conclusions on need’ paras 184 to 191

- 2.34 It can be agreed by arc4 and GPS that there is shortfall of Gypsy and Traveller residential pitches across South Cambridgeshire. This proof has articulated the careful analysis that was carried out to establish a baseline number of pitches and households; and how up to date empirical evidence from household interviews established the scale of future need to 2040/41.
- 2.35 The purpose of a GTAA is to establish a *reasonable and evidenced* position on the number of pitches, households and future need based on available information. Engagement with communities is essential along with careful site observation, in particular to understand how some pitches are not being occupied by Gypsies and Travellers.
- 2.36 Table 2 seeks to reconcile the outcome of analysis in the ANA and GPS. The overall variance to 2033 is 48 households. This is mainly driven by assumptions regarding the baseline number of households in the district.
- 2.37 Ultimately, the ANA expressed an overall need for 130 pitches need as a minimum need over the period 2023/24 to 2040/41.

Table 2 Summary of households

Total households	arc4	GPS	Variance	Comment
Households at base date of 2023	288	362	74	GPS make alternative assumptions regarding households living on unauthorised sites, concealed, doubled up households and hidden need
Total households 2028	350	398	48	Alternative growth rates assumed by GPS
Total households 2033	387	435	48	Alternative growth rates assumed by GPS