

Developing minimum standards for permanent gypsy and traveller sites in South East London

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1 Introduction

1.1 The brief

1.1.1 The South East London Housing Partnership has commissioned Tribal to produce a first draft of a concise set of minimum standards for permanent sites for Gypsies and Travellers. These draft standards are then intended to be used as the basis for further discussion, debate and development by the members of the Partnership. The draft standards relate specifically to sites used by settled populations, and not to transit or temporary sites.

1.1.2 The assignment is also intended to inform the planning of other sub-regional work on assessing the needs of Gypsies and Travellers.

1.2 Methodology

1.2.1 The Partnership has a limited budget available for this assignment, which means that our original approach was based on an internet literature search of best practice. The original intention was that we would then undertake a desk top review of the key documents identified through the literature search, and then consult with key stakeholders on a first draft of suggested standards.

1.2.2 However, as the literature search has produced insufficient good practice material, we have adapted our methods with the aim of delivering a more robust piece of work.

- **Site visits:** We have visited a number of the sites owned/managed in four of the five authorities within the Partnership where there was some, although limited, opportunity to talk to community members currently occupying those sites, and an opportunity to consider the different design approaches the Partnership members have taken on the sites within the sub-region.
- **Workshops:** We ran two workshops with key stakeholders from the five Partnership authorities to draw on their views and experience under each of the main headings used later in this paper. The officers attending came from various professional disciplines including housing management, housing policy, community development, environment and planning, and specialist Gypsy and Traveller site management. (Although the workshops were open to Gypsy and Traveller representatives, and a small number were directly invited, none attended. The view of site managers was that community members may be more likely to be interested in getting involved as the work is further developed).
- **Good practice examples:** We have also consulted with the Gypsy and Traveller Unit at ODPM on where we might find examples of good practice on design and physical standards in other areas. We have followed these up with site visits and interviews in three different local authority areas, Oxfordshire, Norfolk and Doncaster, where there are some of the largest concentrations of Gypsy and Traveller populations in the country.
- **Good practice in Ireland and Scotland:** We have followed up examples of good practice in Northern Ireland by the Northern Irish Housing Executive, in Scotland by the Scottish Executive, and in the Republic of Ireland.
- **Housing Corporation Scheme Development Standards:** Where there have been gaps in our findings we have referred to the Housing Corporation's essential

requirements for the development of social housing, as we consider it provides some useful comparators.

- 1.2.3 **Appendix A** is a spreadsheet which collates in summary form the information on Gypsy and Traveller provision across the partnership boroughs.
- 1.2.4 The key findings from our internet search, desktop review, site visits, interviews and workshop discussions are summarised in the following sections of this paper as a final working draft for the Partnership to now take forward and develop.

2 Proposed minimum standards for sites

2.1 Context

2.1.1 **Policy context:** It is important to set out very briefly the policy context for this assignment. Stated public policy is that members of Gypsy and Traveller communities should have the same access to decent and appropriate accommodation as every other citizen, and there should be sufficient sites to meet their needs. As a result, new approaches are necessary to ensure that the accommodation needs of Gypsies and Travellers are addressed with the same consideration as is given to the accommodation needs of other sections of the community, with the aim of promoting good community relations at the local level. Significant changes to the planning system and as introduced by the Housing Act 2004 mean that local authorities are now expected to take a more strategic approach to ensuring that the accommodation and associated needs of Gypsies and Travellers will be met, including joint work at sub-regional and regional level.

2.1.2 Some of the key changes to be introduced by the new planning guidance particularly relevant to this assignment are the intentions:

- To increase significantly the number of sites with planning permission to address under-provision;
- To recognise, protect and facilitate the traditional lifestyle of Gypsies and Travellers;
- To help or avoid Gypsies and Travellers becoming unintentionally homeless;
- To reflect the status of Gypsy and Traveller accommodation as a part of wider housing provision.

2.1.3 This overall policy direction is summarised in the stated intention to *“create and support sustainable integrated communities where Gypsies and Travellers have equality of access to suitable accommodation, education, health and welfare provision, and where there is mutual respect between all communities for the rights and responsibilities of each community and individual”*.

2.1.4 **Changing patterns:** The traditional patterns of work for Gypsies and Travellers are changing, and this has a long term impact on the way communities now choose to live on permanent sites. Many Gypsies and Travellers have in the past, or continue to earn their living from trades such as furniture dealing, carpet selling, scrap and scrap-metal dealing, casual labouring and seasonal agricultural work. But less demand for these, particularly the seasonal agricultural work, has led to more travellers working in trades which require less mobility. This means that communities are gradually becoming more settled, with women, children and older people more likely to remain in the same place. This can offer real benefits to these communities by creating more stable access to healthcare, education and access to local employment and training.

2.1.5 Although communities are becoming more settled, a key feature of their traditional way of life that has remained the same is the preference for living in extended family groups in close proximity, and this has a significant impact on designing for long term accommodation needs.

2.1.6 The ability and freedom to travel remains an important part of Gypsy and Traveller culture. These changing patterns of settlement do however offer potential for greater integration and social inclusion within local communities.

2.1.7 Because approaches to the changing patterns of settlement in Ireland, both North and South, are further developed than in England, we have included references to good practice in these areas, to help to develop further the design solutions and minimum standards desirable in planning sites in south east London to take account of these issues of integration and social inclusion.

2.2 Standards: Location and environment

2.2.1 The quality of sites identified for permanent Gypsy and Traveller sites is generally an area of concern nationally. Sites typically have markedly higher problems than conventional housing with environmental problems in the surrounding area relating to litter and rubbish dumping, vacant/derelict sites and buildings, vandalism and intrusive industry.

2.2.2 Taking into account the contextual factors highlighted above, it should be stressed that sites should not be located on significantly contaminated land. Given that the Partnership boroughs cover an inner city highly urban area, it would not be realistic to discount "brownfield" sites, but the same considerations when appraising for conventional family housing should apply. The location, layout, and orientation of sites intended for permanent or long term use by the same households should provide a convenient, safe and attractive environment which provides visual and acoustic privacy.¹

2.2.3 The site should be located within a reasonable distance of:²

- Primary healthcare/doctor's surgery;
- Local retail outlets (food and general);
- Post office;
- Public telephone;
- Automatic banking machine/bank;
- Pre-school, nursery, primary school and secondary school;
- Play facilities: for 5-12 year olds and for over 12 year olds;
- Park/public space;
- Public transport: bus, tram, train, underground;

¹ *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation and *Circular 01/94: Gypsy Sites and Planning*, S.14, ODPM

² *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation

- Leisure and sports facilities.

- 2.2.4 The site should be sustainable – offering scope to manage an integrated co-existence with the local community. This should include consideration of noise – both possible disturbance to Gypsy and Travellers living on the site, and possible noise and disturbance to the wider community from movement of vehicles.
- 2.2.5 Site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other’s living quarters), but without inhibiting the important sense of community. Research has shown that many Gypsies and Travellers prefer a circular rather than linear layout of pitches, with children’s play space at the centre.³
- 2.2.6 However during the discussions at the workshop event, Partnership members attending emphasised the importance of site layout being designed to move away from enclosure and isolation which can reinforce stigma and prejudice about Gypsy and Traveller communities. The site design should aim to “design out” crime and social exclusion and “design in” community safety and social inclusion approaches by creating an openness of design where there is ease in passing through, whether walking or driving. One model for achieving this is to have pitches accessed straight from the road, rather than have a single entry point for the site, so that front doors are clearly visible. Privacy can still be protected by placing garden areas and amenity blocks “back to back”. This approach would need to be developed carefully in close consultation with the communities who will be living on the site because of the likely fears of possible harassment and stigmatisation, from which communities will want to protect themselves.
- 2.2.7 Site layout should maximise natural surveillance and scheme specific advice on security provision for the site should be obtained to inform detailed planning.⁴
- 2.2.8 There should be safe and convenient access to the road network.
- 2.2.9 Consideration should be given to site suitability for mixed residential and business use, including consideration of locating business use areas in a separate part of, or in close proximity to, the site.⁵ However, the Northern Ireland Design Guide emphasises that inclusion of work spaces is not recommended on family pitches, and we suggest that this provision on the site should only be made if close consultation with the community has resulted in it being accepted as really necessary.

³ *Local Authority Gypsy/Traveller Sites in England*, (2003) P. Niner, CURS, University of Birmingham, ODPM

⁴ *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation

⁵ *Circular 01/94: Gypsy Sites and Planning*, S. 16, ODPM

2.3 Standards: Size of sites

- 2.3.1 There is a general consensus that smaller sites are better than very large sites but little consensus on the definition of “smaller”. We suggest that a single site should not include more than 18 pitches as a maximum. Research carried out with Gypsies and Travellers⁶ suggests that a minimum of ten pitches should be provided.

2.4 Standards: Boundary treatments and entrance

- 2.4.1 The boundaries to the site should be consistent with the design principles outlined in 2.2.4, 2.2.5 and 2.2.6 above and be clearly marked. Nationally the majority of sites are contained on all sides, and nearly half the sites in the country have an earth mound at the boundary as suggested by the 1979 site design guide. We suggest that this is inconsistent with the principles summarised above and can create a prison-like environment. Boundaries should take into account the adjoining land uses, so that fencing and planting screen out unpleasant and intrusive uses, such as industrial use or main roads, whereas more open boundaries to other residential areas can help to promote integration and inclusion. Consideration of the types of boundary markers to use should take into account the safety and protection of children living on the site.
- 2.4.2 Practical consideration should also be given to how site “expansion” through unauthorised encampments and the parking of unauthorised vehicles can be managed, if boundaries are not clearly demarcated.
- 2.4.3 There should be a gap of 3m within the inside of all boundaries.⁷
- 2.4.4 Different forms of entrance control to sites are commonly used, and consideration should be given to an entrance gate or barrier to prevent unauthorised entry/exit of large vehicles and trailers.

2.5 Standards: Site roadways and paths

- 2.5.1 Roads and footpaths should provide adequate access for fire vehicles and appliances. Detailed specific guidance should be obtained from the local fire authority.
- 2.5.2 Emergency vehicle routes within the site should be kept clear of obstruction at all times.
- 2.5.3 No caravan or park home should be more than 50 metres from a road.
- 2.5.4 Roads should have no overhead cable less than 4.5m above the ground.
- 2.5.5 Gateways should be at least 3.1m wide and have a minimum clearance of 3.7m.

⁶ *Local Authority Gypsy/Traveller Sites in England*, (2003) P. Niner, CURS, University of Birmingham, ODPM

⁷ *Revising the Model Standards for Park Homes* (2005) ODPM

- 2.5.6 Site roads should be designed to allow two lorries to pass each other (minimum 5.5m) and to allow caravans to be manoeuvred onto pitches.
- 2.5.7 There should be clear and safe vehicle/pedestrian segregation with footpaths of at least 0.75m.
- 2.5.8 Roads and footpaths should have adequate lighting for pedestrians walking in darkness.
- 2.5.9 Traffic calming measures such as speed bumps should be considered.
- 2.5.10 Parking provision should be designated for individual pitches and should allow for natural surveillance. Individual spaces should comprise a suitable hard area of a minimum of 2.4 x 4.8m⁸.
- 2.5.11 Every caravan should stand on a hard-standing of suitable material which extends over the whole area occupied by the caravan or home and projects a sufficient distance outwards from its entrance/s to enable occupants to enter and leave safely. It should include a path which links the caravan to the nearest footpath and to the amenity block.

2.6 Standards: Drainage, water and other infrastructure services

- 2.6.1 **Water supply:** There should be a sufficient mains supply to each pitch on the site. Water supplies should comply with current legislation, regulations and British Standards.
- 2.6.2 **Electricity supply:** There should be a mains supply to each pitch with underground cabling and adequately earthed to comply with current electrical installation regulations. Electrical installations should be inspected annually against current regulations.
- 2.6.3 **Gas supply:** LPG gas storage cylinders are often a major health and safety risk on sites. Storage facilities compliant with health and safety regulations for LPG cylinders should be provided. Mains gas supply should be considered for provision to amenity blocks on pitches, and if supplied should be compliant with current gas installation regulations. Gas installations should be inspected annually against current statutory requirements, relevant Standards and Codes of Practice.
- 2.6.4 **Surface water treatment:** surface water drainage and storm water drainage should be installed.
- 2.6.5 **Sewerage:** There should be mains sewage disposal to each pitch. All drainage and sanitation provision should be in accordance with current legislation, regulations and British Standards.
- 2.6.6 **Flooding:** Risk from flooding should be identified by reference to the Environment Agency's Flood Map. Where a flood risk exists, advice from the Environment Agency

⁸ *Design Guide For Travellers' Sites in Northern Ireland* (1997) Department Of the Environment for Northern Ireland

should be sought, and flood warning information and procedures should be provided to all occupants.⁹

2.6.7 Refuse disposal: There should be standard domestic waste disposal arrangements for each pitch in accordance with current legislation and regulations. The provision of a large, non-combustible bin for bulky items not suitable for deposit in individual bins should also be considered. If provided it should be housed within a properly constructed bin store on each site.¹⁰

2.6.8 Lighting: The street lighting arrangements should be planned to minimise the risk of damage through vandalism and avoid problems such as a “flood lighting” effect which can cause nuisance and disturbance to residents.

2.7 Standards: Fire protection

2.7.1 A fire risk assessment should be undertaken and the relevant fire authority should be formally involved in the detailed planning of fire protection arrangements for the site.

2.7.2 There should be a separation distance of at least 6m between caravans.

2.7.3 Where there are ramps for the disabled, verandas or stairs there should be 4.5m clear space between them and they should not face each other in any space.

2.7.4 Garages, sheds or covered storage spaces should only be acceptable between units if they are of a non-combustible construction (including roof) and there is still enough space around each unit to permit means of escape in case of fire. Windows in these structures should not face toward the unit on either side.

2.7.5 Car ports and covered walkways should not be permitted within the 6m space.

2.7.6 All occupiers should be actively encouraged to fit, test and maintain heat and smoke detectors in their caravans.

2.7.7 Fire points should be no more than 50m from any caravan or site building. Fire points should be housed in a weatherproof structure, easily accessible and conspicuously marked.

2.7.8 Water standpipes, reel and hose compliant with the current British Standard should be provided at each fire point where there is sufficient water pressure and flow. If there are problems with water pressure and flow the advice of the fire authority should be obtained on the alternative use of fire hydrants or water based fire extinguishers.

2.7.9 An alarm should be provided at each fire point. The advice of the fire authority should be obtained on a suitable system for the site.

⁹ *Revising the Model Standards for Park Homes* (2005) ODPM

¹⁰ *Design Guide For Travellers' Sites in Northern Ireland* (1997) Department Of the Environment for Northern Ireland

- 2.7.10 All alarm and fire fighting equipment should be installed, tested and maintained in working order and be made available for inspection, with testing, inspections, and remedial action recorded in a log book.
- 2.7.11 Fire notices including action to be taken in case of fire and location of nearest telephone should be provided at each fire point.
- 2.7.12 An immediately accessible telephone should be available on the site for calling the emergency services. A notice by the telephone should state the address of the site.
- 2.7.13 Long grass and vegetation should be cut at regular and frequent intervals to prevent it becoming a fire hazard. Spaces below and between caravans should not be used for storage of combustible materials.

2.8 Standards: Energy efficiency and insulation

- 2.8.1 The energy efficiency and fire resistance of caravans and mobile homes should be improved as far as possible by encouraging occupiers to insulate their homes. The cheapest and most effective method appears to be through use of external cladding, which increases insulation to achieve up to 30% energy saving and increases fire retardant qualities. Most external claddings have a Class O Fire rating which is amongst the highest used.
- 2.8.2 Where cladding is externally applied to very large existing caravans or homes, this will increase their dimensions, and consideration to the impact of this should be given in relation to the minimum separation distances between caravans set out above.

2.9 Standards: Individual pitches

- 2.9.1 **Pitch size:** The Northern Ireland *Design Guide* specifies that pitches should be a minimum of 12.5m wide by 18m deep, capable of accommodating an amenity unit, one vehicle and up to two caravans and space for clothes drying.¹¹ This is effectively a double pitch and we suggest that at present in an inner London area it represents good practice rather than a minimum standard. We therefore propose that as a minimum standard initially, at least 50% of the pitches on any site should comply with this overall size requirement, but that this should be reviewed within an agreed time period by the Partnership.
- 2.9.2 In the interests of safety the minimum distance between any two caravans should be not less than 6m and the distance from any part of a caravan to any part of a road within the site should not be less than 3m.
- 2.9.3 **Pitch surfaces:** Hard surfaces should use materials and be constructed to the industry code of practice. Ideally the pitch should be level with drainage falls only, and preferably with drainage falls no greater than 1 in 50 (i.e. 2%) in any direction¹².

¹¹ *Design Guide For Travellers' Sites in Northern Ireland* (1997) Department Of the Environment for Northern Ireland

¹² *Design Guide For Travellers' Sites in Northern Ireland* (1997) Department Of the Environment for Northern Ireland

2.9.4 **Pitch facilities:** Each pitch should include an amenity block, a clothes drying area, and an area which can be used as a garden or a play space. However, this should be considered in the context of the comments below at S.2.13.

2.9.5 **Pitch boundaries:** Pitch boundaries should be clearly defined with fencing or walling. Removable timber fencing has been used very successfully on one of the Partnership sites improving ease of access and manoeuvring mobile homes onto the site.

2.9.6 **Post:** Delivery addresses should be created and arrangements made so that post can be delivered to each pitch.

2.10 Standards: Amenity blocks

2.10.1 Amenity blocks should have a gross internal floor area of at least 9 square metres. They should include at minimum a separate WC, a bath/shower room, washing facilities and a kitchen area. The access to the WC should not be through the kitchen area, and should be lobbied. Ideally amenity blocks should also include a day room, which can be combined with the kitchen area. One of the Partnership members has developed amenity blocks with generous space standards to include a day room and these have been popular and well used. Ventilation and extraction should be well planned.

2.10.2 Energy efficient heating should be provided which enables temperatures suitable for habitable room use¹³.

2.10.3 Main entrances, doorways and passageways should have a minimum width of 800mm, 750mm and 900mm respectively.¹⁴

2.10.4 Walls in bathrooms and WCs should be designed to take support aids.

2.10.5 The kitchen area should provide enough space for the family to gather and include:¹⁵:

- A food preparation area;
- Serviced sink;
- Hygienic and easily cleaned worktops;
- Space and connections for a cooker, fridge freezer and washing machine;
- At least two double sockets in addition to the cooker point;
- Enclosed storage for: brooms, tall equipment, food, utensils, and washing and cleaning items.

¹³ *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation

¹⁴ *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation

¹⁵ *Scheme Development Standards*, (standards for temporary housing) Fifth Edition (April 2003) Housing Corporation

2.10.6 A hot water supply should be provided for bath/shower, wash hand basin, sink and washing machine in all amenity blocks.

2.10.7 Layouts for amenity blocks can be detached, semi-detached, terraced or built in block form. However the Northern Ireland *Design Guide* states that the grouping of amenity units should be avoided and that a semi-detached design should be the highest density arrangement - we recommend that this should be applied as the minimum standard.

2.11 Standards: Wheelchair and mobility needs

2.11.1 It is likely that as older community members' needs change they may require aids and adaptations, including ramped access, to their caravan or mobile home. The site and amenity blocks should be developed to mobility standards¹⁶ and at least one pitch and amenity block on the site should be developed to full wheelchair standards.

2.12 Standards: Communal provision

2.12.1 There is no clear consensus on the provision of communal facilities on sites. One view is that this can work against integrating Gypsy and Traveller households into the local community by creating a "ghetto" and isolating them from mainstream services. There are also potential management problems of creating space that is not particularly "owned" by anyone, which can leave the space open to vandalism and abuse, and make it costly in management and maintenance terms.

2.12.2 The alternative view is that many Gypsies and Travellers typically experience exclusion and stigmatisation and so need additional support in order to access mainstream services in a sustained and successful way. In this view community provision on sites can help to create a bridge into those mainstream services, particularly in such areas as support with literacy, getting children into mainstream school, and helping all members of the community gain access to primary health care and other resources.

2.12.3 In planning whether to include communal facilities authorities will need to take account of the existing infrastructure arrangements – are there specialist services and liaison arrangements with existing access to conveniently located and suitable physical facilities to help with this bridging role? If not then consideration should be given to the inclusion of a flexible community space within the site where group activities can take place.

2.13 Standards: Play facilities for children

2.13.1 The Northern Ireland *Design Guide* stresses that "a play area of sufficient size must be provided on each permanent site". The communal play area should be safe and attractive using natural features and sympathetic landscaping. It should be located away from vehicular traffic and inaccessible to vehicles, should be fenced, and clearly signed as a play area.

2.13.2 However during our review a number of sources raised the problem of vandalism of play areas, as well as the concern that on-site play facilities perpetuate social exclusion of Gypsy and Traveller children.

¹⁶ *Scheme Development Standards*, Fifth Edition (April 2003) Housing Corporation

- 2.13.3 We suggest that the minimum standard should be that ***there is a safe and pleasant place to play on the site for each child living there***, whether this is provided through a communal play area or by creating sufficient space within the individual pitches. Overall, the provision should be equivalent to at least one tenth of the total site area.¹⁷ If there is space to play on each pitch and there are local parks and playgrounds nearby then it is unlikely that the children living on the site will need a separate play area, but if it is not possible to provide play space on each pitch, then a communal play area will need to be developed, in a setting which is well over-looked by the community to minimise the possibility of vandalism.

¹⁷ *Revising the Model Standards for Park Homes* (2005) ODPM

3 Proposed minimum standards for management

3.1 Standards: The context for the management of Gypsy and Traveller sites

- 3.1.1 There are no specific legal requirements for the management of Gypsy and Traveller sites. Nationally there are a wide range of management arrangements in place including management by the local authority, another local authority, a housing association or voluntary organisation, or a commercial company. One model that appears to have been successful in some areas is where the authority contracts with individual Gypsies and Travellers living on the site to undertake local site management functions for a fee through the terms of a contractual management agreement.
- 3.1.2 In proposing minimum standards for site management we have drawn from interviews with site managers (Oxfordshire, Norfolk and Doncaster), existing research, and from general housing management practice. We propose that these minimum standards apply to all permanent sites irrespective of the management arrangements.

3.2 Standards: Overall management and site visits

- 3.2.1 Each site should be the management responsibility of a named site manager who will be the key point of contact for residents and the person who carries out site visits as necessary. Having one named person will help residents to build trust and confidence in the site management arrangements.
- 3.2.2 Although Gypsy and Traveller sites include relatively small numbers of occupants in the context of a typical general housing management portfolio, the sites often require intensive housing management. The risk assessment process summarised below should clarify the precise level of input needed to manage each specific site. Experience gathered from our interviews and through the research information indicates that where the site manager is not resident on site, visits to the site should be regular and frequent. The feedback from site managers suggests that as a minimum standard, sites should be visited weekly, on the same day each week and at a regular time, so that Gypsies and Travellers expect the visit and can take up any matters with the site manager.

3.3 Standards: Health and safety and risk assessment

- 3.3.1 Gypsy and traveller sites pose a higher level of risk than other forms of accommodation due to the often higher than average numbers of children, the density of occupation generally, fire risk as the result of combustibles such as gas cylinders on site, and the risk of rapid spread of fire between caravans or park homes. As a minimum standard a written health and safety policy and procedure should be in place and adhered to with rigour.
- 3.3.2 The minimum standard should include a comprehensive and formal risk assessment process which should be completed annually. Risk management covers a range of areas including safety of children on sites, fires, dangerous substances, storage of gas cylinders, access for the emergency services, misuse of electrical leads, fly tipping, and general site infrastructure. All these areas of health and safety need to be assessed and action plans made to address areas of risk, including the frequency of

site visits. During site visits, the key health and safety factors included in the assessment and action plan should be monitored and reviewed.

3.4 Standards: Allocations

3.4.1 Practice on allocation of pitches on sites varies from very informal arrangements to formal arrangements with a pointing system. It is common to exclude individuals who are in arrears or who have had previous enforcement action taken against them. As a minimum standard there should be a published allocations policy and procedure which is fair and transparent and is led by accommodation need in determining priorities whilst also taking into account the social and community factors involved in letting pitches. The policy and procedure should be easily available, transparently written and open to scrutiny and challenge. It should also include an appeals process for unsuccessful applicants.

3.5 Standards: Consultation

3.5.1 It is important that Gypsies and Travellers have input to and influence on decisions that affect the way they live on the site. Across the country models of consultation vary, but often the approach is quite informal. It is however important that residents are asked how they would like to be involved and what methods of consultation they would prefer. As a minimum standard there should be a formal commitment to consult with the Gypsy and Travelling community on any changes to the site or services provided – this should encompass both refurbishment and day to day management.

3.6 Standards: Licence agreement

3.6.1 Within current practice most sites issue a licence agreement which offers only basic protection. Licences offer far less security of tenure than the equivalent tenancy agreement that is given to tenants of social housing. The Scottish Executive now expects that tenancies rather than licences are issued. Many sites have a set of site rules that have developed alongside the licence agreement. Where these rules are in place they should be developed in consultation with the Gypsies or Travellers on the site and reviewed from time to time. It is clearer however to ensure that all the terms and conditions for living on the site are contained in one document – the licence agreement.

3.6.2 As a minimum standard a licence agreement should be in place which gives at least 28 days notice and offers the best security of tenure possible within the provisions of a licence agreement. It should set out clearly both the rights and responsibilities of occupants, and the conditions of occupation. The terms of the written agreement should be explained verbally to all new licensees.

3.7 Standards: Collection of licence fees

3.7.1 Residents are usually charged a licence fee on a weekly basis. There may also be payments for water charges, electricity and sewerage charges. A high proportion of residents on most sites receive Housing Benefit and common practice is to direct Housing Benefit payments to be paid directly to the landlord.

3.7.2 New residents may need support in completing the Housing Benefit form and in such instances the site manager should either help with this or signpost the resident to an agency that can offer help. As a minimum standard there should be a written

procedure in place to explain the options for making payments including the option of direct payment by the occupant.

3.8 Standards: Arrears

3.8.1 There should be a written procedure setting out the process for dealing with any arrears in the payment of licence fees and other charges.

3.9 Standards: Repairs

3.9.1 Different arrangements exist around the country for contracting repairs, including the use of approved contractors only, the use of Direct Labour Organisations and the use of any contractor. Contractors can often be reluctant to work on sites. Consistency of the contractors visiting sites is a key point of good practice since trust can be built between the residents and the contractors. Although in practice repairs are often reported through the site manager during site visits, as a minimum standard there should be a contact number provided for repairs to be reported by phone, and out of hours arrangements in place. As a minimum standard there should also be clear guidelines on how to report repairs and setting out clear response time for carrying out repairs – these should be equitable to the response times for social housing repairs.

3.10 Standards: Support needs

3.10.1 As with any group, some Gypsies and Travellers have support needs which will vary substantially in both type and level. Some types of support such as help with completing Housing Benefit and other forms, accessing health, welfare and education services and liaising with other agencies may be quite common, but as with the wider community, other more specialist needs will also arise. The site manager may be able to assist with some support needs but may need to refer on for others. As a minimum standard, site managers must be able to signpost Gypsies and Travellers to local support services such as job centres, education services, primary health care services, and advice services.

3.11 Standards: Service standards and performance monitoring

3.11.1 The policies and procedures which apply on the site should be brought together in a handbook which Gypsies and Travellers can use for their own reference or when seeking external advice and support. It should include a clear statement of the service standards occupants can expect and explain how the managing organisation's performance against these standards will be monitored and assessed. The handbook should be provided when the pitch is allocated and its contents should be explained verbally at the same time.

3.12 Standards: Animals

3.12.1 Many Gypsies and Travellers own animals. The licence agreement should set out the occupant's rights and responsibilities for any animals owned. It should specify which animals can be kept, and when additional consents may be required. It should clearly state responsibilities for the disposal of waste, and for removing the animal if it causes harm to other residents or damages property. If a grazing area for horses and ponies is provided, (there is only one example of this across the Partnership sites as far as we are aware) the terms for its use should be included in the licence agreement.

3.13 Standards: Enforcement action

3.13.1 In cases where there is a breach of the terms of the licence agreement there will generally be a need to take action. Depending on the nature of the breach this may often be informal action in the form of a verbal warning which can then be followed by a written warning. There must be a clear written procedure covering the steps that will be taken before an eviction. This procedure must be explained verbally to new licensees, and to anyone in breach of their licence against whom any enforcement action is taken. Signposting must also be given to the individual to seek independent advice where enforcement action is taken.

3.14 Standards: Complaints

3.14.1 It is good practice, and often a regulatory requirement for many service providers to have in place a formal complaints procedure for their services users. Many of the organisations managing Gypsy and Traveller sites will have such a procedure in place to cover all their wider tenants and services users, and it is important that residents on sites are made aware of the procedure and how they can make a complaint. As a minimum standard there should be a complaints policy and procedure in place which is widely publicised and does not require complaints to be made in writing. Complaints and their resolution should be consistently and regularly recorded, monitored, reviewed and evaluated.

4 Overview

- 4.1.1 The proposals above are intended for further debate and development within the Partnership with the aim of working towards a shared set of minimum standards across the sub-region to which all five authorities are able to sign up. The aim has therefore been to keep this paper concise and simple – we have however provided references for our primary sources below for anyone interested in following up specific proposals within the body of the document.
- 4.1.2 Probably the single most important design factor overall is the need to build in flexibility to the site design as far as this is possible. Given the changing lifestyle patterns highlighted above and the effect this may well have over the longer term in creating increasingly settled communities, it will be important to have sites that can “flex” to meet changes. Despite the poorer health Gypsies and Travellers generally suffer, older people are now living longer, and site provision will need to be flexible to cater for increasing mobility problems of this generation as they age. Rethinking the idea of the mobile home to include other modern modular or prefabricated home options that fit better with the community’s culture than conventional houses, but are better insulated and energy efficient, and with good access and mobility, may be a longer term option on sites.
- 4.1.3 On the management side, the priority must be to provide a responsive and flexible management service with clear service standards and the ability to support Gypsy and Traveller communities to secure improved access to mainstream services, in particular, health and education.
- 4.1.4 It is most important to stress however that in implementing these standards it will be critical to consult comprehensively and effectively with the people most affected by them – the Gypsies and Travellers both living on existing sites or seeking to move onto a settled site in the future.

5 Key references

Amending the definition of a caravan (2005) ODPM

Circular 01/94: Gypsy Sites and Planning, ODPM

Design Guide For Travellers' Sites in Northern Ireland (1997) Department Of the Environment for Northern Ireland

Local Authority Gypsy/Traveller Sites in England, (2003) Pat Niner, CURS, University of Birmingham, ODPM

Model Standards 1989 (Caravan sites) Department of the Environment

Planning for Gypsy and Traveller Sites (2004) ODPM

Revising the Model Standards for Park Homes (2005) ODPM

Scheme Development Standards, Fifth Edition (April 2003) Housing Corporation

Services for Gypsies and Travellers (2002) Scottish Executive

Appendix A - Gypsy and Travellers' provision across the partnership boroughs

