



London Borough of Camden Gypsy and Traveller and Travelling Showpeople Accommodation Assessment



August 2014



Opinion Research Services The Strand, Swansea SA1 1AF
Nigel Moore, Claire Thomas and Steve Jarman
enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

© Copyright August 2014

Contents

1. Introduction.....	5
The Survey	5
Definitions	5
Legislation and Guidance for Gypsies and Travellers.....	6
Planning Policy for Traveller Sites	7
The London Plan 2011	8
Tackling Inequalities for Gypsy and Traveller Communities	9
Funding	9
Methodology	10
2. Gypsy and Traveller Sites and Population	11
Background.....	11
Current on-site Population	12
3. Stakeholder Consultation	13
Introduction.....	13
London Gypsy Traveller Unit	13
Accommodation	14
Neighbouring Authorities	15
London Borough of Islington	15
Accommodation	15
Cross Boundary Issues	15
City of London Corporation	16
Accommodation	16
Cross Boundary Issues	16
Westminster City Council	17
Accommodation	17
Cross Boundary Issues	17
4. On-site Surveys.....	18
Site Provision	18
5. Future Site Provision.....	19
Site Provision	19
Supply of pitches	20

Current Need	20
Future Need.....	20
Current Gypsy and Traveller Site Provision	20
Additional Site Provision: Current Need.....	21
Current Unauthorised Developments	21
Concealed Households	21
Bricks and Mortar	21
Waiting Lists for Public Sites.....	22
Additional Site Provision: Future Need	22
Temporary Planning Permissions	22
New Household Formation.....	22
In-migration from Other Sources	24
Overall Needs for Camden	24
Split by to 2031 by Time Period.....	25
Site Delivery	25
Transit Site/Emergency Stopping Place Provision	26
Needs for Plots for Travelling Showpeople	27
6. Conclusions.....	28
Introduction.....	28
Gypsy and Traveller Future Pitch Provision.....	28
Site Delivery	28
Transit Sites	29
Travelling Showperson Requirements.....	29

1. Introduction

The Survey

- 1.1 Opinion Research Services (ORS) were commissioned by London Borough of Camden to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.
- 1.2 The study seeks to provide an evidence base to enable to authorities to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. The main objective of this study is to provide the Council with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Camden during the period until 2031 including a figure for the next five years. It also required the identification of whether or not the council need to plan for the provision of transit sites or emergency stopping places.
- 1.3 We would note at the outset that the study covers the needs of Gypsies, Irish Travellers, New Travellers and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment.

Definitions

- 1.4 For the purposes of the planning system, 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 dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such. (Planning Policy for Traveller Sites, CLG, March 2012)
- 1.5 Within the main definition of Gypsies and Travellers, there are a number of main cultural groups which include:
 - » Romany Gypsies;
 - » Irish Travellers; and
 - » New Travellers.
- 1.6 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Equalities Act 2010.
- 1.7 Alongside Gypsies and Travellers, a further group to be considered are Travelling Showpeople. They are defined as:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their family's or dependent's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller Sites, CLG, March 2012)

Legislation and Guidance for Gypsies and Travellers

- 1.8 Decision-making for policy concerning Gypsies & Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following pieces of legislation and guidance are relevant when constructing policies relating to Gypsies and Travellers and Travelling Showpeople:
- » Planning Policy for Traveller Sites 2012;
 - » National Planning Policy Framework 2012;
 - » Gypsy and Traveller Accommodation Needs Assessments Guidance October 2007;
 - » Environmental Protection Act 1990 for statutory nuisance provisions;
 - » The Human Rights Act 1998, when making decisions and welfare assessments;
 - » The Town and Country Planning Act 1990 (as subsequently amended);
 - » Homelessness Legislation and Allocation Policies;
 - » Criminal Justice and Public Order Act 1994 (sections 61, 62);
 - » Anti-social behaviour Act 2003 (both as victims and perpetrators of anti-social behaviour);
 - » Planning and Compulsory Purchase Act 2004;
 - » Housing Act 2004 which requires local housing authorities to assess the accommodation needs of Gypsies & Travellers and Showpeople as part of their housing needs assessments. This study complies with the this element of government guidance;
 - » Housing Act 1996 in respect of homelessness.
- 1.9 To focus on Gypsies and Travellers, the Criminal Justice and Public Order Act 1994 (Sections 77, 78) is particularly important with regard to the issue of planning for Gypsy and Traveller site provision. This repealed the duty of local authorities to provide appropriate accommodation for Gypsies and Travellers. However, Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.
- 1.10 For site provision, the previous Labour Government guidance focused on increasing site provision for Gypsies and Travellers and Travelling Showpeople and encouraging local authorities to have a more inclusive approach to Gypsies and Travellers and Travelling Showpeople within their Housing Needs Assessment. The Housing Act 2004 required local authorities to identify the need for Gypsy and Traveller sites, alongside the need for other types of housing, when conducting Housing Needs Surveys. Therefore, all local authorities were required to undertake accommodation assessments for Gypsies and Travellers and Travelling Showpeople either as a separate study such as this one, or as part of their main Housing Needs Assessment.

- 1.11 Local authorities were encouraged rather than compelled to provide new Gypsy and Traveller sites by central government. Circular 1/06 'Planning for Gypsy and Traveller Caravan Sites', released by the CLG in January 2006, replaced Circular 1/94 and suggested that the provision of authorised sites should be encouraged so that the number of unauthorised sites would be reduced.
- 1.12 The Coalition Government announced that the previous government's thinking contained in Planning for Gypsy and Traveller Caravan Sites (Circular 01/06) was to be repealed. CLG published 'Planning Policy for Traveller Sites' in March 2012 which set out the Government's planning policy for traveller sites. It should be read in conjunction with the National Planning Policy Framework.

Planning Policy for Traveller Sites

- 1.13 The document 'Planning Policy for Traveller Sites' now sets out national requirements/policy along with the direction of government policy. Among other objectives the new policies aims in respect of Traveller sites are (Planning Policy for Traveller Sites Page 1-2):
- » that local planning authorities should make their own assessment of need for the purposes of planning;
 - » to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
 - » to encourage local planning authorities to plan for sites over a reasonable timescale;
 - » that plan-making and decision-taking should protect Green Belt from inappropriate development;
 - » to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
 - » that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
 - » for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
 - » to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
 - » to reduce tensions between settled and traveller communities in plan-making and planning decisions;
 - » to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure;
 - » for local planning authorities to have due regard to the protection of local amenity and local environment.

- 1.14 In practice the document states that (Planning Policy for Traveller Sites Page 3):

Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for travelling Showpeople which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

1.15 Local planning authorities should, in producing their Local Plan:

- » identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
- » identify a supply of specific, developable sites or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- » consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- » relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density;
- » protect local amenity and environment.

1.16 A key element to the new policies is a continuation of previous government policies. Local authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' also notes on Page 3-4 that:

Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

1.17 Therefore, criteria based planning policies sit at the heart of the new guidance, irrespective of whether need is identified or not.

The London Plan 2011

1.18 The 2011 London Plan contains no specific requirements for Gypsy and Traveller pitches. The original draft of the Plan allocated 554 new gypsy pitches across London's boroughs, as recommended by the 2008 Greater London Gypsy and Traveller Needs Assessment. However, the final plan allowed each borough to choose whether to create any new pitches. This study represents part of the evidence base for Camden in deciding if new pitch provision is required.

1.19 The 2008 Greater London Gypsy and Traveller Needs Assessment identified a requirement of at least one additional pitch in the period 2007-2012 with potentially up to 4 additional pitches needed and one further additional pitch in the period 2012-2017. However, these results were obtained by extrapolating from the London wide sample and population. For this survey we have only addressed the needs arising in Camden and therefore it is much more specific to the borough.

1.20 Subsequently, the London Plan Revised Early Minor Alterations published for public consultation in June 2012 and considered at an Independent Examination in Public in November 2012, propose to bring the London Plan policy in line with the National Planning Policy on Gypsies and Travellers.

Tackling Inequalities for Gypsy and Traveller Communities

- 1.21 In April 2012 the government issued a further document relating to Gypsies and Travellers in the form of 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers (CLG April 2012)'.
- 1.22 The report contains 28 commitments to help improve the circumstances and outcomes for Gypsies and Travellers across a range of areas including:
- » Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children;
 - » Identifying ways to improve health outcomes for Gypsies and Travellers within the proposed new structures of the NHS;
 - » Encouraging appropriate site provision; building on £60m Traveller Pitch Funding and New Homes Bonus incentives;
 - » Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system;
 - » Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities and working with the financial services industry to improve access to financial products and services;
 - » Sharing good practice in engagement between Gypsies and Travellers and public service providers.

Funding

- 1.23 The Coalition Government policies also involve financial incentives for new affordable pitch provision in the form of the New Homes Bonus. For all new annual supply of pitches on local authority or Registered Provider owned and managed sites, Local Authorities receive a New Homes Bonus equivalent to council tax (based on the national average for a Band A property), plus an additional £350 per annum for six years. This equates to around £8,000 pounds per pitch.
- 1.24 Direct grant funding is also available for Gypsy and Traveller sites. The Homes and Communities Agency (HCA) took over delivery of the Gypsy and Traveller Sites Grant programme from CLG in April 2009. Since then they have invested £16.3m in 26 schemes across the country to provide 88 new or additional pitches and 179 improved pitches. The HCA welcomes bids from Local Authorities, housing associations and traveller community groups working with Registered Providers.
- 1.25 The HCA has now confirmed allocations for all of its £60m of future funding which will support 96 projects around the country for the provision of new Gypsy and Traveller sites and new pitches on existing sites, as well as the improvement of existing pitches.
- 1.26 While all HCA funds for Gypsy and Traveller pitches have now been allocated, further funding may become available as a result of slippage over the course of the programme. Providers are advised to continue to work closely with HCA area teams to develop their proposals should any funding become available.

Methodology

1.27 This section sets out the methodology we have followed to deliver the outputs for this study. Over the past 10 years ORS have developed a methodology which provides the required outputs from a Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment and this has been updated in light of Planning Policy for Traveller Sites.

1.28 The stages below provide a summary of the process undertaken by ORS, with more information on each stage provided in the appropriate section of the report.

Stage 1: Background

1.29 At the outset of the project we sought to understand the background to Gypsy and Traveller and Travelling Showpeople population in Camden. The study sought to identify the location of all known sites in the study area and the number of pitches or plots on each one.

Stage 2: Stakeholder Engagement

1.30 This study included extensive stakeholder engagement with council officers from London Borough of Camden, neighbouring councils and other stakeholders. The aim of this engagement was to help understand the current situation in the study area, in particular to households not on known existing sites and also to discuss Duty to Cooperate issues with neighbouring councils.

Stage 3: Household Survey

1.31 The next stage of the research process was to interview Gypsy and Traveller households in Camden. The aim of these interviews was to understand the current and future requirements of Gypsies and Travellers in the area. To obtain interviews with Gypsy and Traveller households on site in Camden, ORS visited all households on the two authorised public sites in the area and also on the only Travelling Showpeople yard in Camden.

Stage 4: Future Pitch and Plot Requirements

1.32 The methodology used by ORS to calculate future pitch and plot requirements has been developed over the past 10 years and has drawn on lessons from both traditional housing needs assessments and also best and worst practice for Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessments conducted across the country.

1.33 The overall principles behind assessing future needs are relatively simple and were set out in a consultation document sent to stakeholders at the outset of the project. The residential and transit pitch requirements for Gypsies and Travellers are identified separately from those for Travelling Showpeople and for each group the requirements are identified in 5 year periods to 2031 in line with the requirements of Planning Policy for Traveller Sites.

Stage 5: Conclusions

1.34 This stage draws together the evidence from Stages 1 to 4 to provide an overall summary of the requirements for Gypsies and Travellers and Travelling Showpeople in Camden.

2. Gypsy and Traveller Sites and Population

Background

- 2.1 The central aim of this study was to follow a similar format for Gypsy and Traveller and Travelling Showpeople accommodation requirements.
- 2.2 One of the main considerations of this study is the provision of pitches and sites for Gypsies and Travellers. A “pitch” is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans, but can vary in size. A “site” is a collection of pitches which form a development exclusively for Gypsies and Travellers or Travelling Showpeople. However, Travelling Showpeople sites are also sometimes referred to as a “yard”, while the space occupied by one household is commonly referred to as a “plot”. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in Camden.
- 2.3 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of Gypsy and Traveller sites is the publicly-provided residential site, which is provided by the local authority, or by a registered provider (usually a housing association). Places on public sites can be obtained through a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing). There are currently two public sites in the study area (providing 5 pitches).
- 2.4 The alternative to public residential sites is private residential sites for Gypsies and Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing.
- 2.5 The Gypsy and Traveller and Travelling Showpeople population may also utilise other forms of sites due to their mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few weeks to a period of months. An alternative is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it, but has much more limited facilities than a transit site. Both of these two types of site are designed to accommodate Gypsies and Travellers whilst they travel.
- 2.6 Also to be considered are unauthorised developments and encampments. An “unauthorised development” refers to the occupation of land which is owned by the Gypsies and Travellers themselves, but for which they do not have planning permission to use for residential purposes. An “unauthorised encampment” refers to the unauthorised occupation of land which is not owned by the Gypsies and Travellers.

Current on-site Population

- 2.7 The current situation in Camden is that there are two public sites with permanent planning permission. One has a single pitch, while the second was developed with two pitches, but these have been sub-divided and there are now four pitches on the site. Meanwhile, there is also one very long standing yard for Travelling Showpeople which has three plots in use and two vacant plots.

3. Stakeholder Consultation

Introduction

3.1 In order to set the context of the research and ensure the study is based on a sound understanding of the relevant issues, ORS conducted seven semi-structured, in-depth telephone interviews during July and August 2013 which included the Gypsy and Traveller Unit. As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on planning issues that cross administrative boundaries, and for this reason six neighbouring local authorities also contributed to the study and included:

- » London Borough of Barnet
- » London Borough of Brent
- » London Borough of Haringey
- » London Borough of Islington
- » City of London Corporation
- » Westminster City Council.

3.2 The Mayor of London was also asked to take part in the study but declined and provided the following explanation:

While the Mayor recognises that provision for Gypsies and Travellers is a strategic issue (see London Plan Policy 3.8 Bi, Draft Revised Early Minor Alterations to the London Plan paragraphs 3.56 – 3.57a), he considers that it is addressed most effectively by the boroughs. These are best placed to come to a view on how to accommodate what are individually small scale developments in light of local circumstances and national policy requirements.

3.3 Themes covered in the interviews included: the need for additional accommodation provision and facilities; travelling patterns; the availability of land; accessing services; and work being done to meet the needs of Gypsies, Travellers and Travelling Showpeople.

London Gypsy Traveller Unit

3.4 The London Gypsy Traveller Unit (LGTU) is a voluntary sector organisation which has been working in London for 33 years and acts as an advocate for London Travellers and works with Travellers on the roadside and living in sites and houses. The Unit was fully involved in the preparation of the London wide GTAA in 2008 and are currently monitoring the compliance of all London Boroughs (including the London Borough of Camden) with the Planning Policy for Traveller Sites and coordinate the London Gypsy and Traveller Forum which meet quarterly.

- 3.5 The Unit has been working on behalf of Travellers within Camden since 1980 and were directly involved in campaigning against one of the site closures. Representatives attend the Borough's Liaison meetings and are in touch with a number of individual Travellers within the Borough.

Accommodation

- 3.6 The LGTU believe there to be a shortage of accommodation in Camden and referred to the overcrowding issue at one of the two sites in the area. The LGTU argues that there has been a reduction in site provision since 1994 despite the population growing. Importantly, they were of the opinion that there were a number of housed Travellers that would also wish to live on a site in the area.
- 3.7 Positively, the Unit supported the Borough's recent creation of a housing waiting list, which apparently many London Boroughs don't do. In their opinion it has been an open process and it is clear on who Travellers should contact to put their name forward. The forms and criteria were also said to be clear and were consulted on.
- 3.8 The Unit admitted that identifying Travellers can be difficult due to the fact that many Travellers will not self-identify due to the fear that they will suffer as a result. The Borough has acknowledged this as an issue and have held meetings with the Unit to ensure they reach out to as many housed Travellers as possible. The Unit has therefore tried to promote the benefits of putting their name forward on the waiting list along with filling in the census and engaging with the GTAA.
- 3.9 The LGTU supported Camden's plans to build a new site in the area and urged the Borough to strive to deliver a new site. In terms, of management of the site they felt that the Borough's Housing Department were best placed to provide this service. They added that although there was a lack of best practice examples, the Borough could look to *Hackney Homes* who manage a well-regarded site in the London Borough of Hackney.
- 3.10 The Unit felt that Camden did need to change its policy towards the classification of Traveller sites. For instance a site in the area has been given the address 'Traveller Site'. This negatively affects the occupant's insurance costs. It was argued that it would fairer if it was changed to a street and number.
- 3.11 Unfortunately, the Unit expressed disappointment that Camden has lost the Traveller Education service but accepted that many areas around the country have lost this service. They were worried that this withdrawal of services will put education opportunities under threat.
- 3.12 Overall the LGTU made the following recommendations:
- » Ensure they spend the funding received to provide a ten pitched site
 - » Keep an active and open waiting list
 - » Recognise that ten pitches is not enough and use the waiting list to project how many pitches are required in addition to population growth and family formation
 - » Change the address of sites.

Neighbouring Authorities

- 3.14 As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on planning issues that cross administrative boundaries. The interviews with officers representing six neighbouring authorities are reported fully below.

London Borough of Islington

Accommodation

- 3.15 There are no authorised sites or unauthorised encampments in Islington and therefore there is no need for pitches generated by Gypsies and Travellers living on authorised and unauthorised pitches. The officer also reported that there are also no Travelling Showperson families in the area.
- 3.16 In terms of housed Travellers the officer referred to The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment in 2008 estimated that there were 17 gypsy and traveller families living in housing in Islington and therefore identified a need for three pitches in Islington arising from Travellers living in bricks and mortar housing with a psychological aversion. However, the officer reported widespread concern over the method of questioning which the surveys employed and the conclusions drawn from the answers in identifying this element of need.
- 3.17 Notwithstanding that there is no need in Islington, the officer felt that it is probable that, due to the high land values in the borough, no site could be delivered without some kind of grant funding for the purchase of land or provision of council owned land. It is therefore likely that ownership would remain with the local authority or Registered Providers with residents renting pitches.
- 3.18 In the absence of any need from Travellers living on sites, the officer was of the view that the Council would be reluctant to allocate land from its own land holdings or require a developer to provide pitches on private land if this land could realistically be used to house a larger number of households in conventional homes in a borough which has in excess of 10,000 households on its waiting list.
- 3.19 Although the provision of sites is considered to be highly unlikely, In compliance with the London Plan, the council's Core Strategy (2011) contains adopted policy on this as follows:

Any site will need to:

- » Have suitable access for the type of vehicles that could reasonably be expected to use the site;
- » Be able to provide basic amenities, water, sewerage etc.;
- » Be suitable for housing (that it does not experience unacceptable levels of noise for example; and
- » Not have any relevant pre-existing policy designations that restrict the use of the site such as Metropolitan Open Land.

Cross Boundary Issues

- 3.20 The officer was not aware of any cross border movements and felt this was highly unlikely.

- 3.21 In terms of the Duty to Co-operate and from a planning point of view, the officer referred to the London Boroughs joint London-wide Gypsy and Traveller Needs Assessment (2008) and the informal consultation carried out by the Greater London Authorities during the preparation of the London Plan.
- 3.22 The officer also referred to the adopted Site Allocation, Development Management Policies and Finsbury Local Plan (for Bunhill and Clerkenwell Wards) in June 2013 – all three plans were found to have met the Duty to Co-operate and to be sound. The officer also noted that the Council has not to date been approached by other local planning authorities discharging the Duty to Co-operate during the preparation of their plans.

London Borough of Barnet

Accommodation

- 3.23 The officer representing Barnet was not aware of any existing Gypsy and Travellers in the area either on sites or in bricks and mortar and was not aware of Travellers moving through the Borough. On this basis the officer there is not any accommodation need that would justify cross-boundary working with neighbouring Boroughs.
- 3.24 Nonetheless, the Borough does have a criteria based policy in the Core Strategy for the location of new Traveller sites.

City of London Corporation

Accommodation

- 3.25 The officer representing the City of London Corporation stressed the point that the area is a financial district and does not have any sites and Travellers are not attracted to the area. The officer did reveal that in the past the Showman's Guild and other Gypsy and Traveller organisations have sent letters to the City of London requesting that the area considers their needs and the officer explained that in response they have explained that it is small financial districts and there are no available or proposed sites.
- 3.26 It is reported that unauthorised encampments do not occur in the area.

Cross Boundary Issues

- 3.27 The officer reported no cross boundary Traveller issues with Camden or any other London Borough and explained that the Boroughs meet regularly and Gypsy and Traveller issues have not been raised. It was argued that when there are cross border issues to discuss they can call up individual planning authorities and speak the relevant person/department.
- 3.28 Although the City of London Corporation does not provide Traveller sites the officer felt that it was making a financial contribution, through the East London Housing Partnership, to the provision of sites in other Boroughs.

Westminster City Council

Accommodation

- 3.29 Within the City there are no Traveller sites. The Council officer reported that the Traveller count, undertaken twice yearly, consistently returns a figure of zero. In addition to this the officer reported that the Council is not aware of housed Travellers but admitted that no monitoring of this group takes place. Nonetheless the Council does have a Traveller Policy within its Core Strategy and the officer argued that if a site proposal does arise in the future it will be dealt with through the policy. It was felt highly unlikely that any site will come forward because of the built up nature of the area and there are apparently no sites which have the potential to be developed for this reason.
- 3.30 The City has however had to deal with the occasional encampments over the previous two summers on a site in the Marble Arch area on park lane, on a green space between two carriage ways and the Council undertook enforcement action to remove them.

Cross Boundary Issues

- 3.31 Movement through the area is limited to the aforementioned encampments and no other travelling through the area is said to occur.
- 3.32 The Council officer was of the view that the council would be willing to take part in discussions related to Traveller matters but didn't see the usefulness if these were to happen insofar as the Council does not have the capacity to provide any sites.

4. On-site Surveys

Site Provision

- 4.1 All known sites in London Borough of Camden were visited by ORS researchers. The following section documents the outcome of these visits.

Site 1

- 4.2 The site has been occupied since 1989 by an extended Irish Traveller family and was granted formal planning permission in 1994. The site was designed for two pitches but has been sub-divided and currently contains four pitches, but these are over-occupied.
- 4.3 The current occupants of the site are a separated couple, up to six of their children and a number of grandchildren. It is also the case that a number of other children and grandchildren of the site occupants wish to live on the site and are on the waiting list for pitches in Camden.
- 4.4 The family recognise the difficulties of providing sites in a densely populated and extremely expensive area such as Camden, however they do wish to all remain in the area. They do recognise that this may entail living on a range of different sites rather than on a single larger site.

Site2

- 4.5 The site has one pitch and was developed in 1995. The site is occupied by the son of one of the original site occupants.
- 4.6 It is the case that the current site occupant has four siblings, all of whom would wish to ideally be on sites, with at least three being on the current Camden waiting list for a site. The five children of the original site occupants have a total of ten children between them, with five of these being under the age of five years.

Site 3

- 4.7 The site is an extremely long-standing Travelling Showpeople yard which is still in use. When visited by ORS researchers, none of the Travelling Showpeople who own the site were present. The site shows clear signs of usage by Travelling Showpeople, but it also shows evidence of potential sub-letting to non-Travellers. Its long term future however, is uncertain since there are development constraints – particularly due to Metropolitan Open Land designation that means the site is unlikely to be granted planning permission for alternative uses.

5. Future Site Provision

Site Provision

- 5.1 This section focuses on the extra site provision which is required in Camden currently and over the next 18 years by 5 year segments. This time period allows for robust forecasts of the requirements for extra provision based upon the evidence contained within this survey and also secondary data sources
- 5.2 This section concentrates not only upon the total extra provision which is required in the area, but whether there is a need for any transit sites and/or emergency stopping place provision.
- 5.3 We are taking 2013 as a baseline position for our estimates. However, any backlog of unmet need will have been captured within figures for current need. In this case the backlog of need refers to households who need to have their own accommodation. This includes concealed households, those on unauthorised sites who do not wish to move, those in bricks and mortar seeking to move to sites and other households on the waiting list.
- 5.4 Before commencing this section we would note that many neighbouring boroughs in the stakeholder section stated that their needs were zero pitches, often on the grounds that it would be difficult to develop pitches in the area. While it may be difficult to develop sites, Planning Policy for Traveller Sites does not allow local authorities not to assess their needs. Paragraph 8 states:
- ‘Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.’*
- 5.5 On this basis we do not believe that neighbouring boroughs positions that they could not meet any need is sustainable and in accordance with planning guidance. Instead, we consider they should identify need and if it cannot be met in their area they must work with neighbours to identify where it can be met under Duty to Cooperate. Therefore, we have calculated the need for Gypsy, Traveller and Travelling Showpeople pitches and plots in Camden. If these cannot be met in Camden then the local authority has a duty to work with neighbours to identify where they can be met.
- 5.6 We would also note that ORS sought clarification from CLG in 2013 on the role of Gypsy and Traveller Accommodation Assessments in redistributing need across areas. We were very clearly informed that local authorities should assess their own needs and then work through the Duty to Cooperate if they cannot meet those needs. It is not the role of a Gypsy and Traveller Accommodation Assessment to calculate if a local authority can meet its own needs or to reapportion needs between areas.
- 5.7 ‘Planning Policy for Traveller Sites’, requires an assessment for future pitch requirements, but does not provide a suggested methodology for undertaking this calculation. However, in October 2007 Department of Communities and Local Government produced ‘Gypsy and Traveller Accommodation Needs Assessments: Guidance’. As with any housing assessment, the underlying calculation can be broken down

into a relatively small number of factors. In this case, the key issue for residential pitches is to compare the supply of pitches available for occupation with the current and future needs of the households. The key factors in each of these elements are set out below:

Supply of pitches

- 5.8 Pitches which are available for use can come from a variety of sources. These include
- » Currently vacant pitches;
 - » Any pitches currently programmed to be developed within the study period;

Current Need

- 5.9 There are four key components of current need. Total current need (which is not necessarily need for additional pitches) is simply:
- » Households on unauthorised developments for which planning permission is not expected;
 - » Concealed households;
 - » Households in brick and mortar wishing to move to sites; and
 - » Households on waiting lists for public sites.

Future Need

- 5.10 There are three key components of future need. Total future need is simply the sum of the following:
- » Households living on sites with temporary planning permissions;
 - » New household formation expected during the study period; and
 - » Migration to sites from outside the study area.
- 5.11 We will firstly provide the model as set out above for Gypsies and Travellers within Camden. We will then separately analyse the possible need for additional transit provision in the study area before repeating the calculation for Travelling Showpeople.

Current Gypsy and Traveller Site Provision

- 5.12 There are currently 5 pitches on public sites in Camden. The next stage of the process is to assess how much space is, or will become available on existing sites. The main ways of finding this is through:
- » Current empty pitches;
 - » New sites or site extensions which are likely to gain planning permission;
- 5.13 There are currently no empty pitches in Camden and the site with 4 pitches is significantly overcrowded. No household on any site wishes to move to bricks and mortar or outside of Camden, so no pitches are likely to be vacated through these sources.

Additional Site Provision: Current Need

- 5.14 The next stage of the process is to assess how many households are currently seeking pitches in the area. Groups of people who are likely to be seeking pitches will include those:
- » Households on unauthorised developments for which planning permission is not expected;
 - » Concealed households;
 - » Households in brick and mortar wishing to move to sites; and
 - » Households on waiting lists for public sites.

Current Unauthorised Developments

- 5.15 There are currently no unauthorised sites in Camden.

Concealed Households

- 5.16 A concealed household is one who is living within another household and would wish to form their own separate family unit, but are unable to do so because of a lack of space on public or private sites. The site visits and waiting list records indicate that one larger site in Camden contains up to 5 concealed households at any one time who would like their own separate pitch. These households are all on the waiting list for a permanent pitch, but no pitches are available. Four of the concealed households are also on the waiting list for bricks and mortar accommodation. Since the fieldwork was completed 1 has accepted an offer of a flat and 3 are awaiting offers. Therefore it would be expected that 4 of the 5 concealed households will have moved to bricks and mortar accommodation in the first 5 years of the plan period and that this will not result in any vacant pitches.

Bricks and Mortar

- 5.17 Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Needs Assessments. The 2011 UK Census of Population identified a population of 167 Gypsy and Traveller persons in Camden. This is likely to be an under-estimate of the total population due to some Gypsies and Travellers not declaring their ethnic status or completing the Census at all. Given the size of the on-site population, it does indicate that there is a significant population in bricks and mortar.
- 5.18 ORS worked with stakeholders, the local authority and on-site interviewees to identify households in bricks and mortar. Local authority education officers sent letters to parents of known Gypsy and Traveller children to encourage them to contact ORS, but none did so. Therefore, the only households identified in bricks and mortar were those put forward during on-site visits. All of these households are either understood to be content to remain in housing or they are on Camden's waiting list for a site and are therefore not counted here to avoid double counting. In addition as set out in the paragraph above four of the concealed households have expressed a wish to move to bricks and mortar accommodation but this will not result in any vacant pitches.

Waiting Lists for Public Sites

- 5.19 The method of registering a desire to obtain a pitch on a public site is through placing your name on the waiting list held by London Borough of Camden. Excluding the current licence holders and concealed households on sites there are currently 9 additional registrations on the list for a site in Camden. All of the remaining households are relatives of existing site residents.
- 5.20 ORS are aware of the controversy surrounding households in bricks and mortar in the Greater London GTAA 2008, in particular in relation to whether they had a psychological aversion to housing. We would reiterate that for the purposes of the planning system, 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 dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such. (Planning Policy for Traveller Sites, CLG, March 2012)

- 5.21 Therefore, the far more relevant issue is the Gypsy and Traveller status of households. If the person on the waiting list has a history of travelling, but then subsequently moved into housing they are likely to retain their Gypsy and Traveller status. The on-site interviews indicated that all of the households in bricks and mortar on the waiting list were born on sites and are direct relatives of current site occupants. Therefore, given that all households on the waiting list for sites in Camden have joined in the past two years and their Gypsy and Traveller status is unlikely to be disputed we have counted all 9 additional households as need. However, we do accept that possibility that some households may struggle to prove their Gypsy and Traveller status under planning guidance definitions and therefore further work will need to be undertaken with each household to ascertain their traveller status and the scale of their needs.

Additional Site Provision: Future Need

- 5.22 The next stage of the process is to assess how many households are likely to be seeking pitches in the area in the future. Groups of people who are likely to be seeking pitches will include those:
- » Households living on sites with temporary planning permissions;
 - » New household formation expected during the study period; and
 - » Migration to sites from outside the study area.

Temporary Planning Permissions

- 5.23 There are no sites with temporary planning permission in Camden.

New Household Formation

- 5.24 Many studies of Gypsy and Traveller populations assume a net growth in the population of around 3% per annum, and this figure was used in the Greater London Gypsy and Traveller Accommodation Assessment 2008. However, a 3.00% per annum growth rate will see household numbers double in 23.5 years and this figure is highly implausible for long term planning.

- 5.25 In a study on behalf of Office of the Deputy Prime Minister in 2003 (Local Authority Gypsy and Traveller Sites in England Office of the Deputy Prime Minister, 2003), Pat Niner identified that household growth rates of 2.00%-3.00% per cent a year were appropriate when projecting future formations.
- 5.26 In October 2007 the Department of Communities and Local Government issued guidance for conducting Gypsy and Traveller Accommodation Assessments ('Gypsy and Traveller Accommodation Needs Assessments: Guidance'). On page 25 this provides a worked example using a 3.00% per annum household formation rate, but notes in footnote 6 that:
- 'The 3.00% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count.'*
- 5.27 Therefore, the current guidance is clear that each individual assessment should use local evidence for future household formation rates. In a letter from the Planning Minister, Brandon Lewis MP to Andrew Selous MP which was placed in the House of Commons library on March 26th 2014 it was stated:
- 'I can confirm that the annual growth rate figure of 3.00% does not represent national planning policy.*
- The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3.00% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3.00% growth rate figure.'*
- 5.28 ORS have produced a detailed separate paper 'Household Formation Rates for Gypsies and Travellers: Technical Note' which demonstrates that the likely rate of growth for the population of Gypsies and Travellers across the whole of England based upon the best available evidence is probably closer to 1.50% per annum. Officials from Communities and Local Government have seen the technical note and confirmed that they have not undertaken any research on population or household growth for Gypsies and Travellers, and therefore have no information which contradicts this position.
- 5.29 ORS firmly believe that an evidence base for new household formation should use the most accurate information possible and not simply rely upon precedent. Based on the demographics of those living on sites in Camden we have used 2.00% growth per annum for this study.
- 5.30 On the basis that there are a total of 15 households (excluding the 4 seeking to move to bricks and mortar) in Camden either on-site as licences holders or concealed households, or on the waiting list, an annual growth rate of 2.00% would see an additional 6 households in the area by 2031.
- 5.31 In addition the table overleaf illustrates the new household formation based on a range of formation rates between 1.50% and 3.00%. This shows a range of additional pitches that will be required between 2013-2031 of between 4 based on a formation rate of 1.50% and 10 based on a formation rate of 3.00%.

Figure 1
Camden New Household Formation (Base = 15 Pitches)

Growth rate per annum	Number of additional pitches required 2013-2031
1.50%	4
1.75%	5
2.00%	6
2.25%	7
2.50%	8
2.75%	9
3.00%	10

In-migration from Other Sources

- 5.32 The most complicated area for a survey such as this is to estimate how many households will require accommodation from outside the area. Potentially Gypsies and Travellers could move to Camden from anywhere in the country. The number of households seeking to move to Camden is likely to be heavily dependent upon pitch provision elsewhere. It has been noted that a weakness of many Gypsy and Traveller Accommodation Needs Assessments conducted across the country has been that they either allowed for out-migration without in-migration which led to under-counting of need, or they over-counted need by assuming every household visiting the area required a pitch.
- 5.33 Overall the level of migration to and from Camden is a very difficult issue to predict. Currently no households on sites in Camden wish to move to sites elsewhere in the country. We have allowed for a balanced level of migration on to existing sites. The advantage of allowing for net migration to sum to zero is that it avoids the problems seen with other Gypsy and Traveller Accommodation Needs Assessments where the modelling of migration clearly identified too low or high a level of total pitch provision. An assumption of net nil migration implies that the net pitch requirement is driven by locally identifiable need.

Overall Needs for Camden

- 5.34 The estimated extra site provision that is required now and in the next 18 years for Camden will be **16 additional pitches** to address the needs of all identifiable households. This includes those on the waiting list for the public site, concealed households and growth in household numbers due to household formation.
- 5.35 We would note that the location for future provision is a key issue within studies such as this one. The estimates within this study are based upon the needs which exist or are projected to arise in Camden. This is not necessarily the same as stating that these needs should be met in Camden. For example, it is difficult for households to express a desire to live on a public site in an area which currently has no provision. Gypsies, Travellers and Travelling Showpeople are not constrained by local authority boundaries and potentially the requirement for a local authority such as Camden could be met in a neighbouring area. We have not made explicit assumptions about the needs arising in Camden being met elsewhere, but we would

recommend that consideration is given within strategic planning documents to a greater understanding of cross-boundary planning.

Figure 2
Extra Pitches which are required in Camden from 2013-2031

Reason for Requirement/Vacancy	Gross Requirement	Supply	Net Requirement
Supply of Pitches			
Additional supply from empty pitches	-	0	
Additional supply new sites	-	0	
Total Supply		0	
Current Need			
Current unauthorised developments or encampments and seeking to stay in the area	0	-	
Concealed households	1	-	
Movement from bricks and mortar	0 ¹	-	
Waiting list for public sites	9	-	
Total Current Need	10		
Future Needs			
Currently on sites with temporary planning permission	0	-	
Net migration	0	-	
Net new household formation	6	-	
Total Future Needs	6		
Total	16	0	16

Split by to 2031 by Time Period

- 5.36 In terms of providing results for the time periods 2013-2018 and 2018-2023 and 2023-2028 and 2029-2031 we have followed the practice used in most strategic housing market assessments, including the Greater London SHMA 2008 and allowed for the backlog of needs to be addressed over 10 years.
- 5.37 In summary, the net requirement for new pitch provision in the period 2013-2018 is 1 pitch for concealed households and 2 formations, giving a total of 3 pitches. The requirement for 2018-2023 is 11 pitches comprising the 9 households on the waiting list and 2 household formations, with a further 1 pitch needed for household formations in the period 2023-2028, and 1 pitch for formations in the period 2029-31.

Site Delivery

- 5.38 We would reiterate that the 16 pitches required are assessed in accordance with the requirements of Planning Policy for Traveller Sites. While these will be difficult to deliver in Camden, it is not possible to state that difficulties in delivering sites means that the need for sites should not be assessed. Both Planning Policy for Traveller Sites and the Housing Act 2004 place a legal duty on local authorities to assess the needs of Gypsies and Travellers. We again reiterate that advice from CLG indicates that Gypsy and Traveller

¹ Although there are 4 households on sites actively seeking to move to bricks and mortar, these are not counted as they are currently doubled up on existing pitches, and this will not result in any additional supply. They have also been excluded from the number of concealed households.

Accommodation Assessments are not the appropriate mechanism for determining if needs can be met in an area or if needs should be addressed across local authority boundaries. Instead, this is the role of the Duty to Cooperate.

- 5.39 Meanwhile, Paragraph 9, bullet point c of Planning Policy for Traveller Sites states that local authorities should:

Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries).

- 5.40 Therefore, if sites cannot be delivered in an area the authority should cooperate with their neighbours to find solutions. We consider that Camden have taken a lead in Central London and that planning policy will ultimately require other boroughs to follow the same path and work on a sub-regional and regional basis to help meet the needs of Gypsies and Travellers in London.
- 5.41 A possible solution is that Camden takes a more phased approach to site delivery. The overcrowding at Carol Street is currently extremely pressing and requires to be addressed as soon as possible. Therefore, there is an immediate need for 1 pitch in Camden. The remaining need for 15 pitches are for households in bricks and mortar and for future household formations. Many of the bricks and mortar households have been in their current homes for a period of time and while there is clearly an issue that they are not on-sites as they wish, it may be that Camden can work with neighbouring councils to deliver sites across the wider area to eventually allow them to move back to sites.

Transit Site/Emergency Stopping Place Provision

- 5.42 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on their way to somewhere else. A transit site typically has a restriction on the length of stay (around 13 weeks) and has a range of facilities such as water supply, electricity and amenity blocks. Transit sites are usually in public ownership i.e. provided and maintained by the Local Authority. They do not meet local need as this must be addressed on permanent sites.
- 5.43 An alternative to a transit site is an emergency stopping place. This type of site is typically more basic than a transit site, with comparatively limited facilities. These sites also have restrictions on the length of time for which Travellers can stay and this is often much shorter than that applied to a transit site.
- 5.44 There are currently no operational transit sites or emergency stopping places in Camden or anywhere else in London.
- 5.45 The site visits and stakeholder interviews undertaken as part of this assessment have provided little evidence to suggest that any major travelling routes exist through Camden. Instead, all of the need is for permanent pitches.
- 5.46 Camden, along with all other London boroughs, will need to monitor the situation over time, and should circumstances change and regular travelling routes emerge resulting in an increase in unauthorised encampments, a transit site or temporary stopping place might be considered.

Needs for Plots for Travelling Showpeople

- 5.47 There is currently only one known Travelling Showpeople site in Camden. ORS was unable to speak to anyone on the site, but there was no evidence from the site visit that the site was being used beyond its capacity by its current occupants – if anything the site appeared to be underused, with some owners indicating they were seeking to sell for alternative use or potentially sub-letting to non-Travellers. Therefore, we have not identified need for additional plots for Travelling Showpeople as part of this assessment.

6. Conclusions

Introduction

- 6.1 This chapter brings together the evidence presented earlier in the report to provide some key policy conclusions for Camden. It focuses upon the key issues of future site provision for Gypsies and Travellers and also Travelling Showpeople.

Gypsy and Traveller Future Pitch Provision

- 6.2 Based upon the evidence presented in Chapter 5, the estimated extra pitch provision that is required for Gypsies and Travellers in the next 18 years in Camden is for an **additional 16 pitches**. This represents 3 pitches in the period 2013-2018 and 11 pitches in the period 2018-2023 and 1 pitch in the period 2023-2028 and 1 pitch in the period 2029-2031. This figure should be seen as the minimum amount of provision which is necessary to meet the statutory obligations towards identifiable needs of the population.
- 6.3 The estimates within this study are based upon the needs which exist or are projected to arise in Camden. This is not necessarily the same as stating that these needs should be met in Camden. Gypsies, Travellers and Travelling Showpeople are not constrained by local authority boundaries and potentially the requirement for a local authority such as Camden could be met in a neighbouring area. However, for this to occur, cooperation is required from both planning authorities.

Site Delivery

- 6.4 We would reiterate that the 16 pitches required are assessed in accordance with the requirements of Planning Policy for Traveller Sites. Both Planning Policy for Traveller Sites and the Housing Act 2004 place a legal duty on local authorities to assess the needs of Gypsies and Travellers. This document does not assume that these pitches will be delivered in Camden due to the extreme pressure on land use in the borough. However, advice to ORS from CLG indicates that Gypsy and Traveller Accommodation Assessments are not the appropriate mechanism for determining if needs can be met in an area or if needs should be addressed across local authority boundaries. Instead, this is the role of the Duty to Cooperate.
- 6.5 If sites cannot be delivered in an area the authority should cooperate with their neighbours to find solutions. Camden have taken a lead in Central London and that planning policy will ultimately require other boroughs to follow the same path and work on a sub-regional and regional basis to help meet the needs of Gypsies and Travellers in London.
- 6.6 A recommended solution is that Camden takes a more phased approach to site delivery to meet the immediate evidenced needs caused by overcrowding, rather than pursue aspirational targets which may not be possible to deliver in the borough. This is considered particularly appropriate in the absence of any strategic or sub-regional approach by the GLA or other boroughs to assess needs on a borough or cross-boundary basis and where sites may be more capable of being delivered. The overcrowding at Carol Street

is currently extremely pressing and should be addressed as soon as possible. Therefore, there is an immediate need for 1 pitch in Camden and that should be the minimum priority for delivery in the next 5 years. The remaining need for 15 pitches is for households currently housed in bricks and mortar and for future household formations (some of whom may paradoxically want to be housed in bricks and mortar). Many of the bricks and mortar households have been in their current homes for a period of time and while there is clearly an issue that they are not on-sites as they might wish Camden can attempt to gain the necessary cooperation with neighbouring councils to assess needs more strategically and the potential for delivery of sites across the wider area.

Transit Sites

- 6.7 There are currently no operational transit sites or emergency stopping places in Camden or anywhere else in London.
- 6.8 The site visits and stakeholder interviews undertaken as part of this assessment have provided little evidence to suggest that any major travelling routes exist through Camden. Instead, all of the need is for permanent pitches

Travelling Showperson Requirements

- 6.9 There are no current identified needs for additional plots for Travelling Showpeople in Camden.