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Old Oak and Park Royal Development Corporation (OPDC) Gypsy and Traveller Accommodation Assessment



Final Report

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1. Introduction

The Study

1.1 The primary objective of the Old Oak and Park Royal Development Corporation (OPDC) Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the OPDC area for the period 2016-2031.

1.2 The primary reason for completing the update was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes.

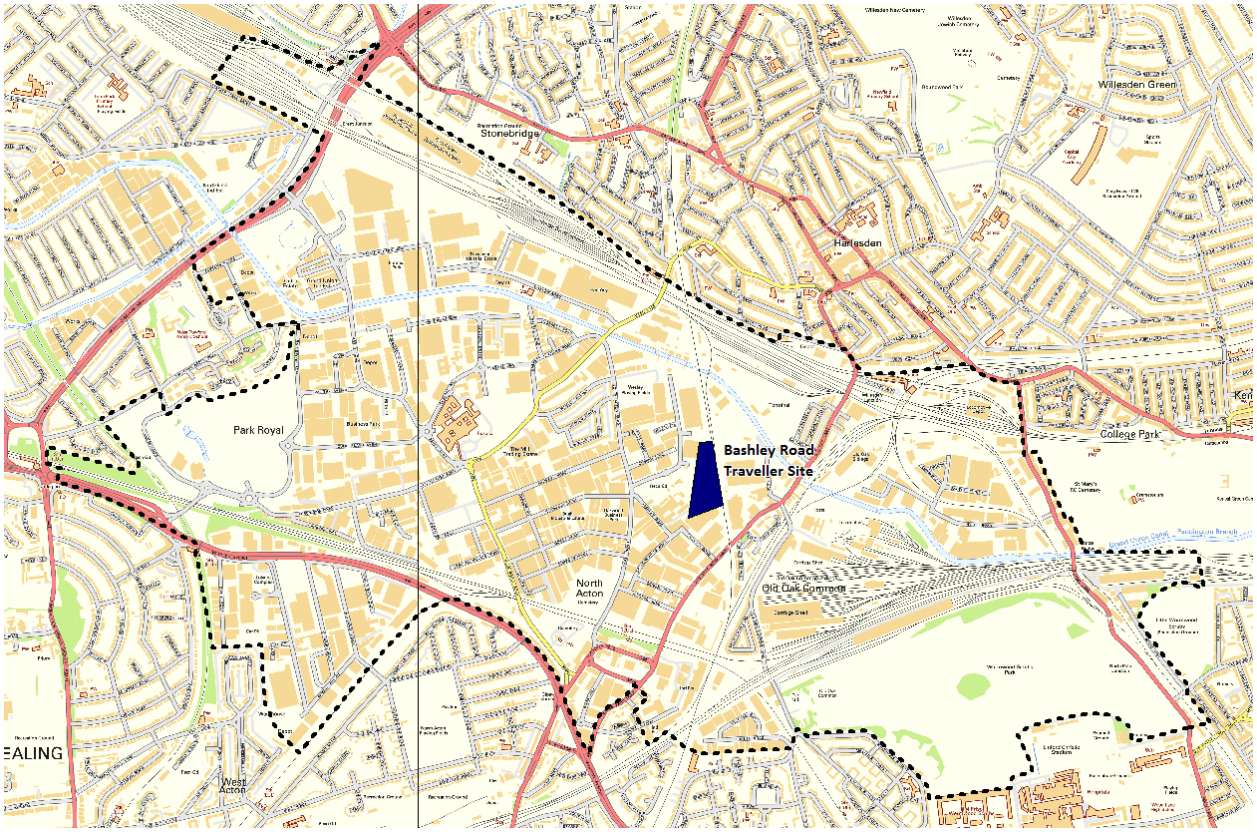
1.3 The study provides an evidence base to enable the Corporation to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, and Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016.

1.4 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).

1.5 The baseline date for the study is **December 2015** which was when the majority of the household interviews were completed.

Local Development Framework in OPDC

1.6 OPDC was established in April 2015 to develop a whole new centre and community for west London based on the investment in rail infrastructure projects HS2 and Crossrail to create new opportunities for people in the area. As a Local Planning Authority OPDC has a duty to prepare a Local Plan. The Local Plan will set out OPDC's strategy for development within its area and contains the policies that will be used to direct development and determine applications across the entire OPDC area. As OPDC is a newly established Local Planning Authority there is no existing Local Plan in place. However there are Local Plans for the 3 Boroughs that make up the OPDC area – Brent, Ealing and Hammersmith and Fulham.



Brent

1.7 The Brent Core Strategy was adopted in 2010 and covers the period to 2026. Policy CP22 addresses Gypsy and Traveller Needs.

CP 22 - Sites For Nomadic Peoples

A). The existing Lynton Close Travellers Site will be protected for its current use

B). Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show people should:

Meet a need for such accommodation which is not being met in the Borough or elsewhere in London, whilst avoiding an over-concentration of such facilities in Brent in comparison to other boroughs.

Be located on a site and in an area both environmentally acceptable for residential occupation and - where the prospective occupiers require – suitable for the undertaking of employment and entrepreneurial activities without detriment to adjacent occupiers' amenities.

Have acceptable road and pedestrian access and be accessible to local services and public transport.

Be suitably landscaped, with appropriate boundary treatment.

Ealing

1.8 The Ealing Development Strategy 2026 (also known as the Core Strategy DPD) was adopted in April 2012 and sets out a vision for the future development of the borough and covers a 15-year plan period up to 2026. Policy 1.2 (n) addresses Gypsy and Traveller needs.

Policy 1.2 (n)

To protect the existing Gypsy and Traveller site at Bashley Road, Park Royal, and to consider additional provision subject to local evidence of need.

The Council's reputation as a local and regional support hub for gypsies and travellers facing accommodation related issues is based on the high quality of service provision in supporting gypsies and travellers looking for accommodation suited to their needs. Historical trends show that there is sufficient churn at the Bashley Road site to cope with the current waiting list as of 2011, with no identified need for provision of an additional site in the short to medium term. The Council will therefore only contribute towards the provision of additional pitches in Ealing based on strong evidence of need, balanced against general housing priorities, availability of funding and the feasibility of identifying an appropriate site. Planning applications for the provision of additional Gypsy and Traveller sites will be determined against the criteria based policy included in the Development Management DPD.

1.9 The Development Management DPD which was adopted in December 2013. Policy 3B addresses issues relating to Gypsies and Travellers.

POLICY 3B - EALING LOCAL POLICY - SPECIAL RESIDENTIAL ACCOMMODATION

Planning Decisions

The development of special residential accommodation will be supported where it meets the identified needs of a specific local group and satisfies the amenity objectives of the plan.

E3.B.1 Special residential accommodation is any type of dwelling that differs in form or occupation from normal housing and includes, but is not limited to; student hostels and Gypsy and Traveller sites. Development of special residential accommodation should have particular regard to any impacts on amenity that may result from an over-concentration of uses in a particular area.

E3.B.2 Identified needs will be determined by the local planning authority and set out in published evidence base documents according to local needs and statutory requirements. As the permission of this type of use is related to identified demand it may be appropriate to grant temporary permissions where the future of this need is limited or uncertain.

Hammersmith and Fulham

1.10 The Local Development Framework (LDF) for Hammersmith and Fulham includes the Core Strategy which was adopted in 2011, the Development Management Local Plan which was adopted in 2013, and supplementary planning guidance on development management issues and major regeneration areas in the borough. In January 2015 the Council consulted on a draft Local Plan which outlines the Council's vision and preferred options for development in the borough for the next 20 years.

1.11 The Core Strategy includes Policy H5 which addresses the needs of Gypsies and Travellers.

Borough Wide Strategic Policy - H5 Gypsies and Traveller Accommodation

The council will work closely with RBKC to protect and improve the existing gypsy and traveller site at Westway which is located in Kensington & Chelsea. Any additional site to accommodate the specific needs of Gypsies and Travellers in this borough should:

Meet local need;

Take account of suitable vehicular access and satisfactory parking, turning and servicing; be within close proximity of local facilities and services such as a primary school, local shops and a GP; and

Be designed in such a way that it is compatible with existing and planned uses, fit for the occupants and at the same time does not impact on residential amenity.

1.12 The Draft Local Plan includes Policy HO10 which addresses the needs of Gypsies and Travellers.

Borough-wide Policy HO10 - Gypsy and Traveller Accommodation

The council will work closely with the Royal Borough of Kensington and Chelsea to protect, improve and, if necessary, increase the capacity of the existing gypsy and traveller site at Westway.

Justification

7.57 The council and the Royal Borough of Kensington and Chelsea (RBKC) jointly provide a site for 19 travellers' pitches on land in RBKC to the east of the White City Opportunity Area. Following engagement with the local traveller community an assessment of the need for traveller pitches will be carried out in accordance with the Gypsy and Traveller Accommodation Needs Assessments (DCLG 2007). When this assessment is completed the council will work with RBKC and the local traveller community to determine how best to meet any identified needs.

Alternative Options - Policy HO10 - Gypsy and Traveller Accommodation

Identify alternative sites in the borough to meet the need for additional pitches.

Definitions

1.13 The current 'planning' definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

1.14 In their response to the consultation on Planning and Travellers that resulted in the revised PPTS being published, DCLG stated that the Government will, when parliamentary time allows, seek to amend primary legislation to clarify the duties of local authorities to plan for the housing needs of their residents. This is set out in the Housing and Planning Act (2016) which omits sections 225 and 226 of the 2004 Housing Act.

1.15 Provisions set out in the Housing and Planning Act now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider

the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance[1] related to this section of the Housing and Planning Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the new 'planning' definition of a Traveller will need to be assessed as part of the wider housing needs of the area through the SHMA process, and will form a subset of the wider need arising from households residing in caravans.

1.16 Another key issue is that there may also be Romany, Irish and Scottish Travellers who no longer travel so will not fall under the Planning or Housing definition, but who may claim that Councils need to meet their needs through the provision of culturally suitable housing.

The 'Planning Definition' in PPTS

1.17 For the purposes of the planning system, the definition was changed in the revised PPTS. The new definition is set out in Annex 1 of PPTS and states that:

> *For the purposes of this planning policy "gypsies and travellers" means:*
>
> *Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*
>
> *In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*
>
> *a) Whether they previously led a nomadic habit of life.*
> *b) The reasons for ceasing their nomadic habit of life.*
> *c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*
>
> *For the purposes of this planning policy, "travelling showpeople" means:*
>
> *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 own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.*
>
> (Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

1.18 The key change that was made to both definitions was the removal of the term *persons…who have ceased to travel permanently,* meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

[1] "*Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats*." (March 2016)

Definition of Travelling

1.19 One of the most important questions that GTAAs will need to address in terms of applying the new definition is *what constitutes travelling*? This has been determined through case law that has tested the meaning of the term '*nomadic'*.

1.20 **R v South Hams District Council (1994)** – defined Gypsies as "*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.

1.21 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.

1.22 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.

1.23 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

1.24 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.

1.25 It is ORS' understanding that the implication of these rulings in terms of applying the new definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will in the view of ORS **not cover** those who commute to work daily from a permanent place of residence.

1.26 It will also be the case in our view that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the new definition.

1.27 Households will also fall under the new definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have

travelled in the past. In addition households may also have to demonstrate that they plan to travel again in the future.

Legislation and Guidance for Gypsies and Travellers

1.28 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 key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- The Housing and Planning Act, 2016
- Planning Policy for Traveller Sites (PPTS), 2015
- National Planning Policy Framework (NPPF), 2012
- Planning Practice Guidance[2] (PPG), 2014

1.29 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the revised Planning Policy for Traveller Sites (PPTS) that was published in August 2015. It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition the Housing and Planning Act makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the new 'planning' definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2015

1.30 The revised PPTS, which came into force in August 2015, sets out the direction of Government policy. As well as introducing the new definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- *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.*

[2] With particular reference to the sections on Housing and Economic Development Needs Assessments

- *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.*

1.31 In practice, the document states that (PPTS Paragraph 9):

- *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.*

1.32 PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:

- *Identify and annually update 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 6-10 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 strategic 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.*

1.33 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 in Paragraph 11 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.*

2. Methodology

Background

2.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of PPG in 2014, changes to PPTS in August 2015 and the Housing and Planning Act in 2016, as well as responding to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.

2.2 The revised PPTS published in August 2015 contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the new definition for Gypsies, Travellers and Travelling Showpeople.

2.3 The approach currently used by ORS was considered in April 2016 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:

> *'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'*

2.4 The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Glossary of Terms

2.5 A Glossary of Terms can be found in **Appendix A**.

Desk-Based Research

2.6 At the outset of the project ORS researched the background to the Gypsy, Traveller and Travelling Showpeople population in the OPDC area. This comprised the collation of a range of important secondary data from the following available sources:

- Census data.
- Details of all authorised sites and yards.

- Traveller Caravan Counts.
- Records of any unauthorised sites and encampments.
- Relevant information from planning, housing, education, community safety, environmental health and health services.
- Information on planning applications and appeals.
- Information on any other current enforcement actions.
- Existing GTAAs and other relevant local studies.
- Existing policy, guidance and best practice.

2.7 This data was used to inform the stakeholder interviews and fieldwork and has also been analysed in conjunction with the outcomes of the other elements of the study to allow ORS to complete a thorough review of the needs of Travelling Communities in the OPDC area.

Stakeholder Engagement

2.8 This study included local stakeholder engagement. This involved a series of in-depth telephone interviews Officers from OPDC, Officers from the 3 Boroughs that make up OPDC, an Officer from the neighbouring Borough of Kensington and Chelsea (who provide joint site with Hammersmith and Fulham, and with an Officer from Oxfordshire County Council who manage the public site in Ealing.

2.9 The stakeholder interviews covered the following key topics:

- What dealings or relationships people have with Gypsies, Travellers and Travelling Showpeople.
- Experiences of any particular issues in relation to Gypsies, Travellers and Travelling Showpeople.
- Awareness of any Gypsy and Traveller sites and Travelling Showpeople yards either with or without planning permission and whether this varies over the course of a year.
- Any trends people may be experiencing with regard to Gypsies, Travellers and Travelling Showpeople (e.g. increase in privately owned sites or temporary sites).
- What attracts Gypsies, Travellers and Travelling Showpeople to an area.
- Identification of any seasonal fluctuations that may occur.
- Awareness of any occurrences of temporary stopping by Travellers.
- Identifying the relationship between the settled and travelling communities.
- Awareness of any Travellers currently residing in bricks and mortar accommodation.
- Awareness of any cross boundary issues.
- Any other comments on the Gypsy, Traveller and Travelling Showpeople community in the study area.
- Newham
- Tower Hamlets

Survey of Travelling Communities

2.10 Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather robust information to use to assess households against the new planning definition of a Traveller multiple visits were made to households where it was not initially possible to conduct an interview because they were not in or not available at the time.

2.11 Our experience suggests that an attempt to interview households on all pitches is more robust, as opposed to a sample based approach which often leads to an under-estimate of need - an approach which is regularly challenged by the Planning Inspectorate and at planning appeals.

2.12 ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The Site Record Form that was used has been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the new household definition. All pitches and plots were visited by members of our dedicated team of experienced interviewers who work solely on our GTAA studies across England and Wales. They conducted semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics (to meet the new requirements in PPTS). Interviewers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.

2.13 They also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.

2.14 Where it was not possible to undertake an interview, staff sought to capture as much information as possible about each pitch using a Pitch Outcome Form from sources including neighbouring residents and site management (if present).

Engagement with Bricks and Mortar Households

2.15 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. ORS feel that the only practical approach is to take all possible measures to identify as many households in bricks and mortar who may want to take part in an interview to determine their future accommodation needs, including a wish to move to a permanent pitch in the study area. Contacts in bricks and mortar were sought through a wide range of sources including speaking with people living on the existing site to identify any friends or family living in bricks and mortar who may wish to move to a site, and intelligence from the Council.

2.16 Through this approach we endeavoured to do everything within our means to publicise that a local study was being undertaken in order to give all households living in bricks and mortar who may wish to move on to a site the opportunity to make their views known to us. As a rule we do not extrapolate the findings from our fieldwork with Gypsies and Travellers living in bricks and mortar households up to the estimated Gypsy and Traveller bricks and mortar population as a whole, and work on the assumption that those wishing to move will make their views known to us based on the wide range of publicity that we put in place.

Timing of the Fieldwork

2.17 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such all of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. Fieldwork was completed in December 2016.

Calculating Current and Future Need

2.18 The primary change introduced by PPTS (2015) in relation to the assessment of need is the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the new definition. As the new PPTS has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the new definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes to meet the new definition, and stay away from their usual place of residence when doing so.

2.19 To identify need, PPTS requires an assessment for current and future pitch requirements, but does not provide a methodology for this. However, 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 is to compare the supply of pitches available for occupation with the current and future needs of the population.

Non-Travelling Households

2.20 Whilst households who do not travel fall outside the new definition of a Traveller, Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equalities Act 2010. In addition provisions set out in the new Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance[3] related to this section of the Housing and Planning Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the new 'planning' definition of a Traveller will need to be assessed as part of the wider housing needs of the area, for example through the SHMA process, and will form a subset of the wider need arising from households residing in caravans. An assessment of need for non-travelling Travellers can be found in **Appendix B**.

Unknown Households

2.21 As well as calculating need for households that meet the new 'planning' definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be assessed as part of the GTAA where they are believed to be ethnic Gypsies and Travellers who **may** meet the new definition. Whilst there is no law or

[3] "*Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats*." (March 2016)

guidance that sets out how the needs of these households should be addressed, an approach has been taken that seeks an estimate of potential need from these households. This will be a maximum additional need figure over and above the need identified for households that do meet the new definition.

2.22 The estimate of potential need in unknown households seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).

2.23 Should further information be made available to the Council that will allow for the new definition to be applied, these households could either form a confirmed component of need to be included in the GTAA or the SHMA.

2.24 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the new definition based on the outcomes of households where an interview was completed.

2.25 However, data that has been collected from over 1,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of households who have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition.

2.26 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through the SHMA.

2.27 Councils will need to carefully consider how to address the needs associated with 'Unknown' Travellers in Local Plan policies as it is unlikely that all of it will need to be addressed through the provision of Gypsy or Traveller pitches. In terms of Local Plan policies the Councils could consider the use of a specific site allocation/protection policy for those households that do meet the new definition, together with a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that the meet the definition.

Applying the New Definition

2.28 When the household survey was completed the outcomes from the questions on travelling were used to determine the status of each household against the new definition in PPTS. The same definition issue applies to Travelling Showpeople as to Gypsies and Travellers.

2.29 As this point ORS think that households that need to be considered in the GTAA fall under one of 3 classifications that will determine whether their housing needs will need to be assessed in the GTAA. Only those households that meet, or may meet, the new definition will form the components of need to be included in the GTAA. Whilst the needs of those households that do not meet the new definition do not need to be included in the GTAA, they will be assessed to provide the Council with components of need to consider as part of the SHMA (see **Appendix B**).

- Households that travel under the new definition.

- Households that have ceased to travel temporarily under the new definition.
- Households where an interview was not possible who may fall under the new definition.

Supply of Pitches

2.30 The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:

- Current vacant pitches.
- Pitches currently with planning consent due to be developed within 5 years.
- Pitches vacated by people moving to housing.
- Pitches vacated by people moving from the study area (out-migration).

Current Need

2.31 The second stage was to identify components of current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space already available in the study area. This is made up of the following. It is important to address issues of double counting:

- Households on unauthorised developments for which planning permission is not expected.
- Households on unauthorised encampments for which planning permission is not expected.
- Concealed, doubled-up or over-crowded households (including single adults).
- Households in bricks and mortar wishing to move to sites.
- Households in need on waiting lists for public sites.

Future Need

2.32 The final stage was to identify components of future need. This includes the following four components:

- Older teenage children in need of a pitch of their own.
- Households living on sites with temporary planning permissions.
- New household formation.
- In-migration.

2.33 Household formation rates are often the subject of challenge at appeals or examinations. We agree with the position set by Ministers from DCLG in a Ministerial Statement in 2014 and firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on precedent. This is set out in more detail later in this report.

2.34 All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers are identified separately and the needs are identified in 5 year periods to 2031.

Pitch Turnover

2.35 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

> *West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.*

2.36 In addition a recent GTAA Best Practice Guide produced by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

> *Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.*

2.37 As such, other than current vacant pitches on sites that are known to be available, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

2.38 PPTS also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas.

- Transit sites
- Temporary/Emergency stopping places
- Temporary (seasonal) sites
- Negotiated Stopping Agreements

2.39 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the CLG Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring planning authorities and other stakeholders was also be taken into consideration when determining this element of need in the study area.

3. Gypsy, Traveller and Travelling Showpeople Sites and Population

Introduction

3.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which 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. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.

3.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly-provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing).

3.3 The alternative to public residential sites are private residential sites and yards for Gypsies, 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. Generally the majority of Travelling Showpeople yards are privately owned and managed.

3.4 The Gypsy, Traveller and Travelling Showpeople population also has other forms of sites due to its 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 days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.

3.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the land owner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards in the OPDC Area

3.6 In the OPDC there is 1 public site with 24 pitches which is located at Bashley Road in Ealing, no private sites with permanent planning permission, no sites with temporary planning permission and no transit provision. There are no tolerated or unauthorised sites, or Travelling Showpeople yards.

Figure 2 - Total amount of authorised provision in the OPDC area (December 2015)

Category	Sites/Yards	Pitches/Plots
Private with permanent planning permission	0	0
Private sites with temporary planning permission	0	0
Public Sites (Council and Registered Providers)	1	24
Public Transit Provision	0	0
Private Transit Provision	0	0
Travelling Showpeople Provision	0	0

Caravan Count

3.7 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year, and reported to DCLG. This is a statistical count of the number of *caravans* on both authorised and unauthorised sites across England. With effect from July 2013, DCLG has renamed the 'Gypsy and Traveller Caravan Count' as the 'Traveller Caravan Count.'

3.8 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.

4. Stakeholder Engagement

Introduction

4.1 To be consistent with the guidance set out in Planning Policy for Traveller Sites and the methodology used in other GTANA studies that ORS have undertaken, OPDC asked ORS to undertake a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. Ten interviews were completed in total and the number of interviews undertaken is viewed to be satisfactory and consistent with similar GTANAs that ORS have completed.

4.2 Themes covered in the interviews included: current GTAAs; 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.

4.3 Importantly, this element of the study also provided an opportunity for the research team to speak to stakeholders who are likely to be in contact with housed Gypsy, Travellers and Travelling Showpeople with the aim of identifying accommodation needs resulting from this group.

4.4 Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used.

Current GTAAs

Brent

4.5 The Council has not undertaken a recent GTAA study since the 2008 London assessment. A new Brent SHMA was commissioned last year and captures some elements of need relating to Gypsy and Traveller sites, but this does fulfil the full requirements of a GTAA; the SHMA undertaken by ORS has yet to be published. The benefits of undertaking a study are said to be clarity on the number of pitches needed to inform updated site allocations and meet requirements of NPPF and Equality Duty.

Ealing

4.6 The Council has not carried out a GTAA since the London wide Assessment undertaken by Fordham's in 2008 and have no plans to undertake anything further. However the Council undertook a SHMA in 2013 (DCA) and Gypsy and Traveller accommodation needs were included. The report states that no further need for pitches/plots were required.

Hammersmith and Fulham:

4.7 The Council have not carried out a GTAA since the London wide Assessment undertaken by Fordham's in 2008 and have no plans to undertake anything further. The Officer that was interviewed was unaware of any need for Gypsies or Travellers being included within any recent SHMAs.

Kensington and Chelsea

4.8 The London-wide GTAA identified a need to provide between 6 and 12 pitches in the Borough for the period 2007-2017. The shortage and high cost of land is said to limit opportunities to provide new pitches. Interviewees were unable to provide any further information and the SHMA undertaken in 2013 does not mention Gypsies and Travellers.

Current Accommodation Provision

Brent

4.9 The Council has one public site at Lynton Close – which is outside of the OPDC area. This provides 34 pitches and is currently managed by Oxfordshire County Council. There are some issues relating to the site which the Council are looking to address including ongoing maintenance. The Council has set up a working group to address these issues and the group is also looking at land adjacent to the site. Oxfordshire CC said that overcrowding is an issue on the majority of the sites they manage and this is mainly as a result of newly forming households from existing residents. The current site is in need of redesigning due to a poor existing layout. There are no tolerated sites, unauthorised sites or sites with temporary permissions in Brent. There are also no yards for Showpeople and little evidence to suggest there is a need.

Ealing

4.10 The Council has one public site at Bashley Road, which is within the OPDC area, and provides 24 pitches. The site is said to be in an unsuitable location as it is in a middle of an industrial area, there is poor access and the site is in need of modernisation (including improved drainage). There is a small waiting list and the site is also managed by Oxfordshire County Council. There are few known overcrowding issues. There are no unauthorised sites, tolerated sites or sites with temporary planning permission in Ealing, and now Showperson yards.

Hammersmith and Fulham

4.11 There are no sites which are authorised, tolerated or with temporary planning permission in Hammersmith and Fulham, and also no known Showperson yards. There is a site in Kensington and Chelsea called Westway at Stable Way, Latimer Road which has 20 pitches and this is used to house any Traveller need identified in Hammersmith and Fulham.

Bricks and Mortar Community

4.12 Very little information was provided by those who were interviewed about Traveller households living in bricks and mortar in the OPDC area. Some of those interviewed were aware of a small number of households living across their whole Borough but no further information was provided. The Officer from Ealing confirmed there had been a specific floating support service for housed Gypsies or Travellers but due to budget cuts and restructuring this was now included as part of a wider generic floating housing support service.

Short-term Roadside Encampments and Transit Provision

4.13 Unauthorised encampments are not said to regularly occur and overall it was felt that there has been a decrease in recent years. In Ealing where the site that is in the OPDC area in located it was confirmed that whilst there has been a general decrease over the last 10 years, there have been a number of short-term encampments in the past 18 months, but that these were households who were passing through.

4.14 There are not known to be any transit sites and/or and short stay/emergency stopping places in any of the boroughs, and it is not though that there is need for any specific transit provision.

Cross-Boundary Issues

4.15 There are not known to be any cross-border issues between those Boroughs interviewed and the OPDC area. There are some examples of cross-border/joint working e.g. planning groups, involvement in neighbouring authorities SHMA stakeholder consultations, and Brent's Education and Welfare Service works with other Council areas and schools regarding the educational needs of Gypsy, Traveller and Travelling Showpeople children. The OPDC has been in existence for 7 months and say they are working closely with the Boroughs at various levels and specifically in relation to Gypsies and Travellers as part of developing their Local Plan and sharing draft policies.

Future Priorities and Any Further Issues

4.16 Future priorities were related to the area of responsibility of those who were interviewed. The priority for Brent's Education and Welfare Service is to ensure that appropriate education is accessible and achievable to all children regardless of their background. Ealing would like to modernise their site but there is a need to relocate it and they would like to work with OPDC because the location of their current site is in an industrial location and they would like to relocate it in consultation with current residents and OPDC. The OPDC priority is finalise their Local Plan and associated policies; in addition to this if a need for additional Gypsy and Traveller pitches is evidenced in the OPDC area they will work with the 3 Boroughs to bring forward land that would be suitable to meet such need.

5. Survey of Travelling Communities

Interviews with Gypsies and Travellers

5.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living on sites in the OPDC area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future site provision.

5.2 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards and encampments in the study area. This identified just 1 public site in the OPDC area – the site is at Bashley Road in Ealing and is managed by Oxfordshire County Council. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below sets out the number of pitches, the number of interviews that were completed, and the reasons why interviews were not completed. A summary of the overall findings from the site interviews will be provided to OPDC in a separate briefing note.

Figure 3 - Sites and Yards Visited in the OPDC area (December 2015)

Public Sites	Pitches/Plots	Interviews	Reasons for not completing interviews
Bashley Road	24	16	8 x no contact possible
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
None	-	-	-
Travelling Showpeople Yards			
None	-	-	-

5.3 ORS sought to undertake a full demographic study of all pitches as part of our approach to undertaking the GTAA as our experience suggests that a sample based approach very often leads to an under-estimate of current and future needs which can be the subject of challenge at subsequent appeals and examinations.

5.4 Through the site surveys data was collected for households living on 16 of the 24 pitches on the public site. There were no refusals to be interviews and repeated attempts were made to complete interviews with the remaining 8 pitches but they were not successful.

Efforts to contact bricks and mortar

5.5 ORS attempted to make contact with bricks and mortar by asking residents that were interviewed if they knew of any friends or family who were looking to move to a site and through the stakeholder interviews. However as a result of this no households were identified to be interviewed.

6. Current and Future Pitch Provision

Introduction

6.1 This section focuses on the additional pitch provision which is needed by the local authorities in the study area currently and to 2031. This includes both current unmet need and need which is likely to arise in the future. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficultly in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.

6.2 We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.

6.3 This section concentrates not only upon the total additional provision which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New 'Planning' Definition

6.4 As well as assessing housing need, the revised version of PPTS now also requires a GTAA to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the new 'planning' definition of a Gypsy, Traveller or Travelling Showperson. Only households that fall within the new definition, and those who *may* meet the definition (households where an interview was not completed), will have their housing needs assessed separately from the wider population in the GTAA. The new definition now excludes those who have ceased to travel permanently.

Current and Future Pitch/Plot Needs

6.5 To identify need, PPTS requires an assessment of current and future pitch requirements, but does not provide a methodology for this. However, 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 is to compare the supply of pitches available for occupation with the current and future needs of the population.

New Household Formation Rates

6.6 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates*. The main conclusions are set out here and the full paper is in **Appendix C**.

6.7 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.

6.8 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

6.9 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers - based on 36% of the population being aged under 18.

6.10 ORS assessments take full account of the net local household growth rate per annum for each local authority, calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, and in-/out-migration.

6.11 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence from the household interviews. This demographic evidence has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by travelling status).

6.12 In certain circumstances where the numbers of households and children are low it may not be appropriate to apply a % rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.

Breakdown by 5 Year Bands

6.13 In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5 year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from older teenage children, and net movement from bricks and mortar) in the first 5 years. In addition the total net new household formation is split across the 5 year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the New Definition

6.14 The outcomes from the questions in the household survey on travelling were used to determine the status of each household against the new definition in PPTS. This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the new definition. Only those households that meet the new

definition, in that they were able to demonstrate that they travel for work purposes, and stay away from their usual place of residence when doing so – or that they have ceased to travel temporarily due to education, ill health or old age, form the components of need that will form the baseline of need in the GTAA. Households where an interview was not completed who **may** meet the new definition have also been included as a potential additional component of need from 'unknown' households.

6.15 Information that was sought from households where an interview was completed allowed each household to be assessed against the new 'planning' definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the travelling status of households living on the public site in OPDC.

Figure 4 – Travelling Status of Households in the OPDC area (December 2015)

Site Status	Meets New Definition	Does Not Meet New Definition	Unknown
Gypsies and Travellers			
Public Sites	0	16	8
Private Sites	-	-	-
Temporary Sites	-	-	-
Tolerated Sites	-	-	-
Unauthorised Sites	-	-	-
Sub-Total	**0**	**16**	**8**
Travelling Showpeople			
Public Yards	-	-	-
Private Yards	-	-	-
Temporary Yards	-	-	-
Tolerated Yards	-	-	-
Unauthorised Yards	-	-	-
Sub-Total	**0**	**0**	**0**
TOTAL	**0**	**16**	**8**

6.16 Figure 4 shows that for Gypsies and Travellers no household meets the new definition of a Traveller in that none were able to provide information demonstrating that they travel for work purposes and stay away from their usual place of residence, or have ceased to travel temporarily. A total of 16 Gypsy and Traveller households did not meet the new definition as they were not able to demonstrate that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. A number stated that they have travelled in the past but all stated that they do not plan to travel again in the future. Just one household stated that they do travel but that this was for cultural visits and visiting friends and family. Therefore none of those who were interviewed were able to demonstrate that they travel for work purposes, or have ceased to travel temporarily – these households did not meet the new definition.

6.1 Discussions with residents on the site also suggested strongly that those households for which an interview was not possible are also long-term settled residents of the site and do not travel for work purposes.

6.17 The number of households where an interview was not possible are recorded as unknown. The reasons for this included households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar Interviews

6.2 Identifying households in bricks and mortar has been frequently highlighted as an issue with Gypsy and Traveller Accommodation Assessments. As noted earlier, ORS went to all possible lengths to identify Gypsies and Travellers living in bricks and mortar and worked with stakeholders and on-site interviewees to identify households to interview. This process resulted in **no contacts to interview**.

Pitch Needs – 'Travelling' Gypsies and Travellers

6.3 None of the Gypsy and Traveller households living on the public site in the OPDC area meet the new definition of a Gypsy or Traveller as they were not able to provide information that they travel for work purposes or have ceased to travel temporarily due to education, ill health old age. Therefore the current and future accommodation needs of these households should not be considered as part of the requirements for this GTAA. However there were high levels of need identified from households that do not meet the new definition and these will need to be as part of the settled population through the Objectively Assessed Need (OAN). Need for these households that do not meet the new definition can be found in **Appendix B**.

Pitch Needs – 'Unknown' Gypsies and Travellers

6.18 Whilst it was not possible to determine the travelling status of a total of 8 households as they were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be ethnic Gypsies and Travellers and **may** meet the new definition as defined in PPTS.

6.19 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the new definition based on the outcomes of households in that local authority where an interview was completed.

6.20 However data that has been collected from over 1,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition.

6.21 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.

6.22 Should further information be made available to the Council that will allow for the new definition to be applied to the 'unknown' households, the overall level of need could rise by up to 2 pitches from new household formation (this uses a base of the 8 households and a net growth rate of 1.50%[4]). Therefore additional need *could* increase by up to a further 2 pitches, plus any concealed adult households or 5 year

[4] The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

need arising from older teenagers living in these households (if all 8 'unknown' pitches are deemed to meet the new definition). However, as an illustration, if the national average of 10% were to be applied this could be as low as no additional pitches.

Need from In-Migration

6.24 Evidence drawn from stakeholder and site interviews in the OPDC area has been carefully considered and has not identified any specific sources of movement due to in-migration, other than natural pitch turnover. Beyond this, the Council will need to assess any in-migrant households seeking to develop new sites in the area or wishing to move to the public site against the new definition set out in PPTS as part of any criteria-based planning policies for any new potential sites which do arise.

Travelling Showpeople Needs

6.25 As there were no Travelling Showpeople identified as living or requiring accommodation in the OPDC area there is not a need for the Council to make any provision to meet need, other than managing Showpeople who may visit the area to run fairs.

Transit Sites / Temporary Stopping Places

6.26 When determining the potential need for transit provision the GTAA has looked at data from the DCLG Caravan Count, the outcomes of previous stakeholder interviews, records on numbers of unauthorised encampments, and the potential wider issues related to changes made to PPTS in 2015.

DCLG Caravan Count

6.27 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.

6.28 Evidence from the Caravan Count shows that there have been very low numbers of unauthorised caravans on land not owned by Travellers recorded in recent years.

Stakeholder Interviews

6.29 The stakeholder interviews found there to be low levels of encampments in the area, and that the majority were short-term and transient.

Potential Implications of PPTS 2015

6.30 It has been suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case but it will take some time for any changes to pan out. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS 2015 evidence base and there has not been sufficient time yet for this to happen at this point in time.

Transit Recommendations

6.31 It is recommended that whilst there may be a small number of encampments in the OPDC area, there is no need for any new transit provision and the situation relating to levels of unauthorised encampments should be continually monitored whilst any potential changes associated with the new PPTS develop.

6.32 A review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3 year evidence base following the changes to PPTS in August 2015 – including attempts to try and identify whether households on encampments meet the new definition. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.

6.33 In the short-term OPDC should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments, as opposed to taking forward an infrastructure-based approach. At this point whilst consideration should be given as to how to deal with households that do and do not meet the new definition, from a practical point of view it is likely that households on all unauthorised encampments will need to be dealt with in the same way.

6.34 The term 'negotiated stopping' is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

6.35 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold water supply; portaloos; sewerage disposal point and refuse disposal facilities.

7. Conclusions

Gypsy and Traveller Future Pitch Provision

7.1 Based upon the evidence presented in this study the estimated additional pitch provision needed to 2031 for Gypsies and Travellers in the OPDC area who meet the new definition of a Traveller is for **no additional pitches**.

7.2 However it was clear from the fieldwork that there are current and future accommodation needs associated with the households living on the public site in Ealing and they will need to be considered by the Council through its overall assessment of housing need undertaken through the Strategic Housing Market Assessment. In addition given that there were Irish Traveller households identified as living on the site – the Council will also need to consider how to meet the needs of these households as they may be covered by equality legislation through their ethnic group being a protected characteristic.

Transit Sites

7.3 Given the limited levels of unauthorised encampments over recent years that have been identified in the OPDC area, it is recommended that there is **not a need for the Council to deliver any new transit provision at this time**. However the situation should be closely monitored with neighbouring Boroughs during the GTAA plan period.

Travelling Showpeople Requirements

7.4 As there were no Travelling Showpeople identified as living or requiring accommodation in the OPDC area there is not a need for the Council to make any provision to meet need, other than managing Showpeople who may visit the area to run fairs.

Appendix A: Glossary of Terms

Amenity block/shed	A building where basic plumbing amenities (bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Chalet	A single storey residential unit which can be dismantled. Sometimes referred to as mobile homes.
Concealed household	Households, living within other households, who are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Household formation	The process where individuals form separate households. This is normally through adult children setting up their own household.
In-migration	Movement into or come to live in a region or community
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order to settle in another.
Personal planning permission	A private site where the planning permission specifies who can occupy the site and doesn't allow transfer of ownership.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.
Private site	An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local authority or a Registered Housing Provider.
Temporary planning permission	A private site with planning permission for a fixed period of time.
Tolerated site/yard	Long-term tolerated sites or yards where enforcement action is not expedient and a certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers of applications to live on a site.
Yard	A name often used by Travelling Showpeople to refer to a site.

Appendix B – Assessment of Need for 'Non-Travelling' Travellers in in the OPDC area

It is not a requirement to include details of need from Non-Travelling Gypsies and Travellers in the GTAA. However, an assessment of this need has been made to support the Council with its SHMA.

Analysis of the household interviews for those **who do not meet the new definition** indicated that there is a need for 12 additional pitches for the GTAA period to 2031 – 4 from concealed households or adults and 8 from new household formation using a rate of 2.30% as over 55% of the site residents are aged under 18.

Assessment of Need for 'Non-Travelling' Travellers in OPDC to 2031

Gypsies and Travellers – Do Not Meet New Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	4
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	**4**
Future Need	
Households on sites with temporary planning permission	0
5 year need from older teenage children	0
In-migration	0
New household formation	8
(Base number of households 20 and formation rate 2.30%)	
Total Future Needs	**8**
Net Pitch Need = (Current and Future Need – Total Supply)	**12**

Additional Need for 'Non-Travelling' Households in OPDC by 5 Year Periods

Years	0-5	6-10	11-15	
	2016-21	2021-26	2026-31	Total
	6	3	3	**12**

Appendix C – Technical Note on Household Formation

Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University



As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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Household Growth Rates

Abstract and conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments – even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.

2. Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).

3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum – a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.

4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.

5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

Introduction

6. The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

7. In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished *gross* and *net* growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' *net* growth rates of about 3% without sufficiently recognising either the range of factors impacting on the *gross* household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.

8. For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009').

9. However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying that:

> *The 3% 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.* [In footnote 6, page 25]

10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.

11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

> *I can confirm that the annual growth rate figure of 3% 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% 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% growth rate figure,'*

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% *net* growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a *net* compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

Household Growth Rate per Annum	Time Taken for Household to Double
3.00%	23.5 years
2.75%	25.5 years
2.50%	28 years
2.25%	31 years
2.00%	35 years
1.75%	40 years
1.50%	46.5 years

14. The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

Household Growth Rate per Annum	5 years	10 years	15 years	20 years	50 years	100 years
3.00%	116	134	156	181	438	1,922
2.75%	115	131	150	172	388	1,507
2.50%	113	128	145	164	344	1,181
2.25%	112	125	140	156	304	925
2.00%	110	122	135	149	269	724
1.75%	109	119	130	141	238	567
1.50%	108	116	125	135	211	443

15. In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

Caravan counts

16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site – which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.

17. However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.

18. ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

Date	Number of caravans	5 year growth in caravans	Percentage growth over 5 years	Annual over last 5 years.
Jan 2015	20,123	1,735	9.54%	1.84%
July 2014	20,035	2,598	14.90%	2.81%
Jan 2014	19,503	1,638	9.17%	1.77%
July 2013	20,911	3,339	19.00%	3.54%
Jan 2013	19,359	1,515	8.49%	1.64%
Jul 2012	19,261	2,112	12.32%	2.35%
Jan 2012	18,746	2,135	12.85%	2.45%
Jul 2011	18,571	2,258	13.84%	2.63%
Jan 2011	18,383	2,637	16.75%	3.15%
Jul 2010	18,134	2,271	14.32%	2.71%
Jan 2010	18,370	3,001	19.53%	3.63%
Jul 2009	17,437	2,318	15.33%	2.89%
Jan 2009	17,865	3,503	24.39%	4.46%
Jul 2008	17,572	2,872	19.54%	3.63%
Jan 2008	17,844	3,895	27.92%	5.05%

Jul 2007	17,149	2,948	20.76%	3.84%
Jan 2007	16,611	2,893	21.09%	3.90%
Jul 2006	16,313	2,511	18.19%	3.40%
Jan 2006	15,746	2,352	17.56%	3.29%
Jul 2005	15,863	2,098	15.24%	2.88%
Jan 2005	15,369	1,970	14.70%	2.78%
Jul 2004	15,119	2,110	16.22%	3.05%
Jan 2004	14,362	817	6.03%	1.18%
Jul 2003	14,700			
Jan 2003	13,949			
Jul 2002	14,201			
Jan 2002	13,718			
Jul 2001	13,802			
Jan 2001	13,394			
Jul 2000	13,765			
Jan 2000	13,399			
Jan 1999	13,009			
Jul 1998	13,545			

19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.

20. However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)

21. There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

Modelling population growth

Introduction

22. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

Population profile

24. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.

25. The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years – so the population could not possibly double in 23.5 years.

Table 4
Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9

Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

Birth and fertility rates

26. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)

27. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, 'Ethnic identity and inequalities in Britain: The dynamics of diversity' by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community

28. ORS's have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

29. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

30. However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.

31. Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

Modelling outputs

32. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.

33. There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum – meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.

34. The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

Household growth

35. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).

36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.

37. Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5
Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

38. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

Household Type	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

39. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).

40. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.

41. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

Household dissolution rates

42. Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

Area	Annual projected household dissolution	Number of households	Percentage
Greater London	25,000	3,266,173	0.77%
Blaenau Gwent	468.2	30,416	1.54%
Bradford	3,355	199,296	1.68%
Ceredigion	348	31,562	1.10%
Exeter, East Devon, Mid Devon, Teignbridge and Torbay	4,318	254,084	1.70%
Neath Port Talbot	1,352	57,609	2.34%
Norwich, South Norfolk and Broadland	1,626	166,464	0.98%
Suffolk Coastal	633	53,558	1.18%
Monmouthshire Newport Torfaen	1,420	137,929	1.03%

43. The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

Summary conclusions

44. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.

45. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

46. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.

47. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.

Addendum to Gypsy and Traveller Accommodation Assessment February 2018

1.0 Introduction

1.1 There is one permanent Gypsy and Traveller Site within OPDC's boundaries at Bashley Way, Park Royal. This site is owned by the London Borough of Ealing and consists of 22 authorised and occupied pitches. OPDC's Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified that there was no need for additional pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS).

1.2 The Royal Borough of Kensington and Chelsea (RBKC) and London Borough of Hammersmith and Fulham (LBHF) are jointly responsible for one permanent site, Stable Way, which comprises a total of 20 pitches, of which one is taken up by 'The Hut' community centre, resulting in 19 available authorised pitches. The site previously fell within LBHF's administrative boundary until a boundary change in 1995 and now falls within RBKC's administrative boundary.

1.3 The Joint RBKC and LBHF GTANA has identified a need for 9 pitches between 2016 to 2030. The councils have jointly prepared a framework methodology to appraise sites to meet the identified needs of the Gypsy and Traveller community. The methodology seeks to adopt a similar approach used for determining deliverable and developable housing sites in the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The approach to identifying appropriate sites is to determine if the site is:

- available for a Gypsy and Traveller site;
- suitable for Gypsy and Traveller development;
- achievable (i.e. deliverable within 5 years and viable);
- developable (i.e.in a suitable location with reasonable prospect that the site is available could be viably developed at the point in time envisaged); and
- consideration is also given to the specific accommodation and lifestyle requirements of Gypsies and Travellers.

1.4 This addendum uses the same methodology to assess the potential for sites within the OPDC area to help to meet the need identified in the Joint GTANA. In summary, it identifies that there is no capacity within the OPDC area for additional pitches to meet the needs of the Gypsy and Traveller community.

2.0 Overview of area

2.1 The Mayor has established the Old Oak and Park Royal Development Corporation (OPDC) to drive forward regeneration of this area. OPDC's Local Plan recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential and bring tangible benefits for local communities and Londoners.

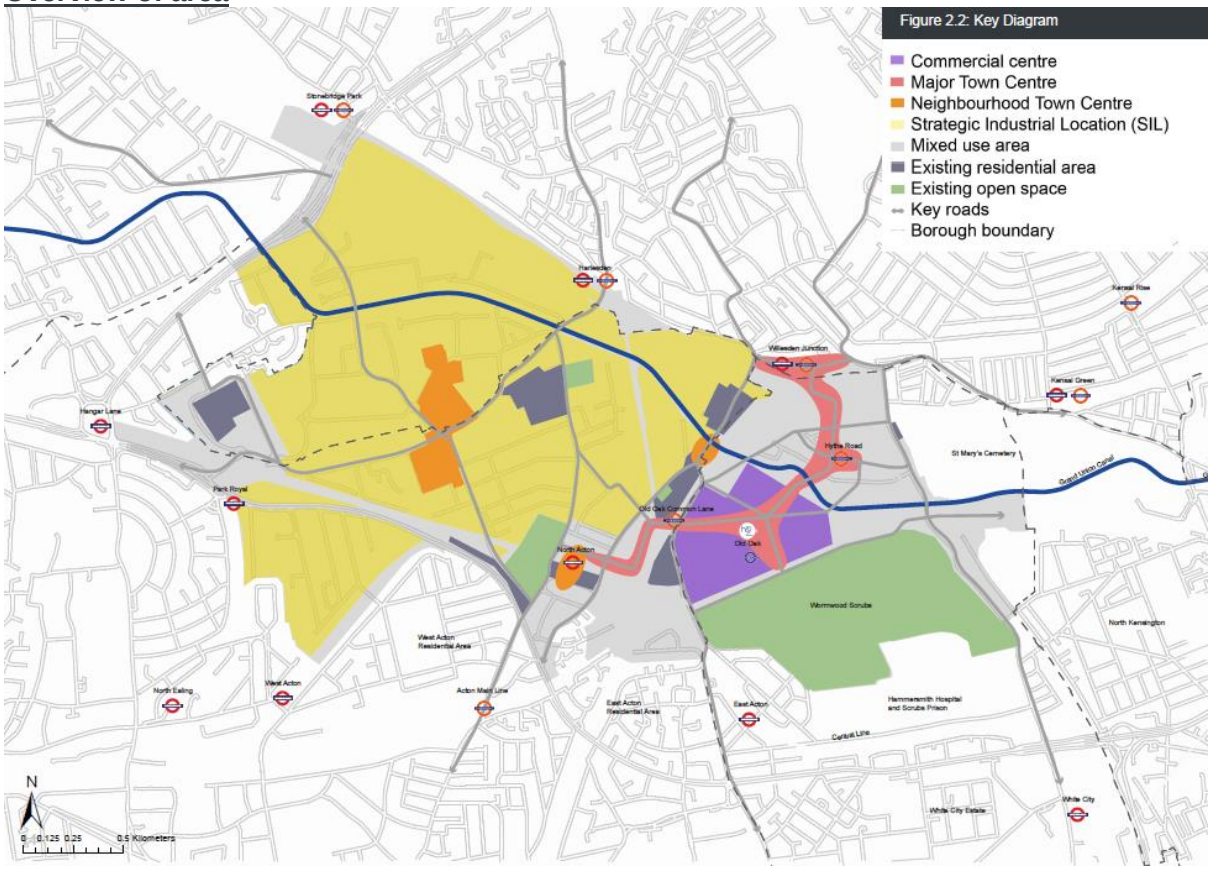
2.2 The OPDC area covers a total of approximately 650 hectares and today is predominantly Strategic Industrial Location (SIL), with some small residential communities. Considering the future excellent national, regional and local public transport links to be provided in the OPDC area, the London Plan has designated Old Oak and Park Royal as Opportunity Areas with the capacity to deliver 25,500 new homes and 65,000 new jobs.

2.3 Broadly, OPDC consists of three distinct land-use areas:

- Park Royal Industrial Estate (SIL);

- The core development area of Old Oak which is being strategically de-designated from SIL through OPDC's Local Plan; and
- Wormwood Scrubs, a Metropolitan Park, which also benefits from Metropolitan Open Land (MOL) designation and is also protected through its own Act of Parliament, the Wormwood Scrubs Act 1879.

Overview of area



3.0 Strategic Industrial Location

3.1 Park Royal (228 hectares) is a strategically-important industrial estate for the functioning of London's economy and in accordance with the London Plan and Local Plan, should be protected, strengthened and intensified. London needs Park Royal to function efficiently and supply the population and other businesses with goods and services, whilst also accommodating any future manufacturing and servicing activity that needs to remain in the capital. It is one of the few areas in London that can accommodate uses, including industrial activities, operating 24 hours a day and creating noise, which can lead to land use conflicts elsewhere.

3.2 In line with the London Plan, industrial uses within SIL should be protected to accommodate the following broad industrial type activities:

- light industrial (Use Class B1c);
- general industrial uses (Use Class B2);
- storage and logistics/distribution uses (Use Class B8);
- other industrial-type functions including secondary materials and waste management, utilities infrastructure, land for transport sand wholesale markets and recycling;
- flexible B1c/B2/B8 premises suitable for occupation by SMEs;

- small scale walk to services for industrial occupiers such as workplace creches or café.

3.3 Development in SIL for other uses, such as residential developments, are not permitted, except in areas released through a strategically coordinated process, such as being de-designating through a Local Plan.

3.4 As an Opportunity Area in the London Plan, Park Royal is required to deliver 10,000 new jobs as part of OPDC's overall target to deliver 65,000 jobs. This requires the strengthening and intensification of employment uses within the Park Royal Industrial Estate.

3.5 The existing Gypsy and Traveller Site at Bashley Road site is an anomaly as it is located within SIL. In accordance with the Local Plan, OPDC will protect the site for its current use. The site has also been considered for additional Gypsy and Traveller accommodation in section 6. Apart from this specific site, given the planning restrictions on SIL and the need as an Opportunity Area to provide 10,000 jobs, it is not considered appropriate to allocate land within Park Royal SIL for the purposes of providing pitches for the Gypsy and Traveller community.

4.0 Core development area

4.1 The core development area of Old Oak is being strategically de-designated from SIL through OPDC's Local Plan. Old Oak is one of London's most significant brownfield locations with the development capacity to accommodate significant new housing (including affordable housing), commercial development, social and physical infrastructure, linked to planned improvements in public transport connectivity and capacity.

4.2 The London Plan has identified the Old Oak Opportunity Area as having the capacity to provide at least 24,000 new homes and 55,000 jobs. Housing development at this scale will be high density with tall buildings with town centre, commercial and associated social infrastructure uses. The form of development required for Gypsy and Traveller accommodation is unlikely to be compatible with the aspiration to deliver this kind of development to help meet local and London housing needs.

4.3 The core development area is also very complex with significant requirements for funding and physical infrastructure to unlock sites for re-development for housing. The site is in multiple ownerships and will require complex land assembly. Given these circumstances, it will be difficult to bring forward sites for Gypsy and Traveller accommodation. As a strategic Opportunity Area, it is not considered appropriate to allocate land within the core development area for the purposes of providing pitches for the Gypsy and Traveller community.

5.0 Wormwood Scrubs

5.1 Part of OPDC's area, approximately 67 hectares, contains Wormwood Scrubs. This is classified in the London Plan as Metropolitan Open Land (MOL) and a Metropolitan Park. MOL is afforded the same protection as the Green-belt which means keeping land permanently open and to enhance the beneficial use, such improving access; opportunities for outdoor sport and recreation etc. Wormwood Scrubs also benefits from the Wormwood Scrubs Act 1879 which sets out provisions to ensure the open space is made available in perpetuity for all Londoners.

5.2 As MOL, it is not considered appropriate to allocate land within the Wormwood Scrubs area for the purposes of providing pitches for the Gypsy and Traveller community.

6.0 Site assessments

6.1 As part of the Joint GTANA conducted by RBKC and LBHF, Gypsy and Traveller survey respondents were asked if they knew of any potentially suitable sites or locations/land within LBHF that could be considered appropriate for designating as Gypsy and Traveller accommodation. The respondents identified two areas which are also located within the OPDC area. The following site assessments have been undertaken:

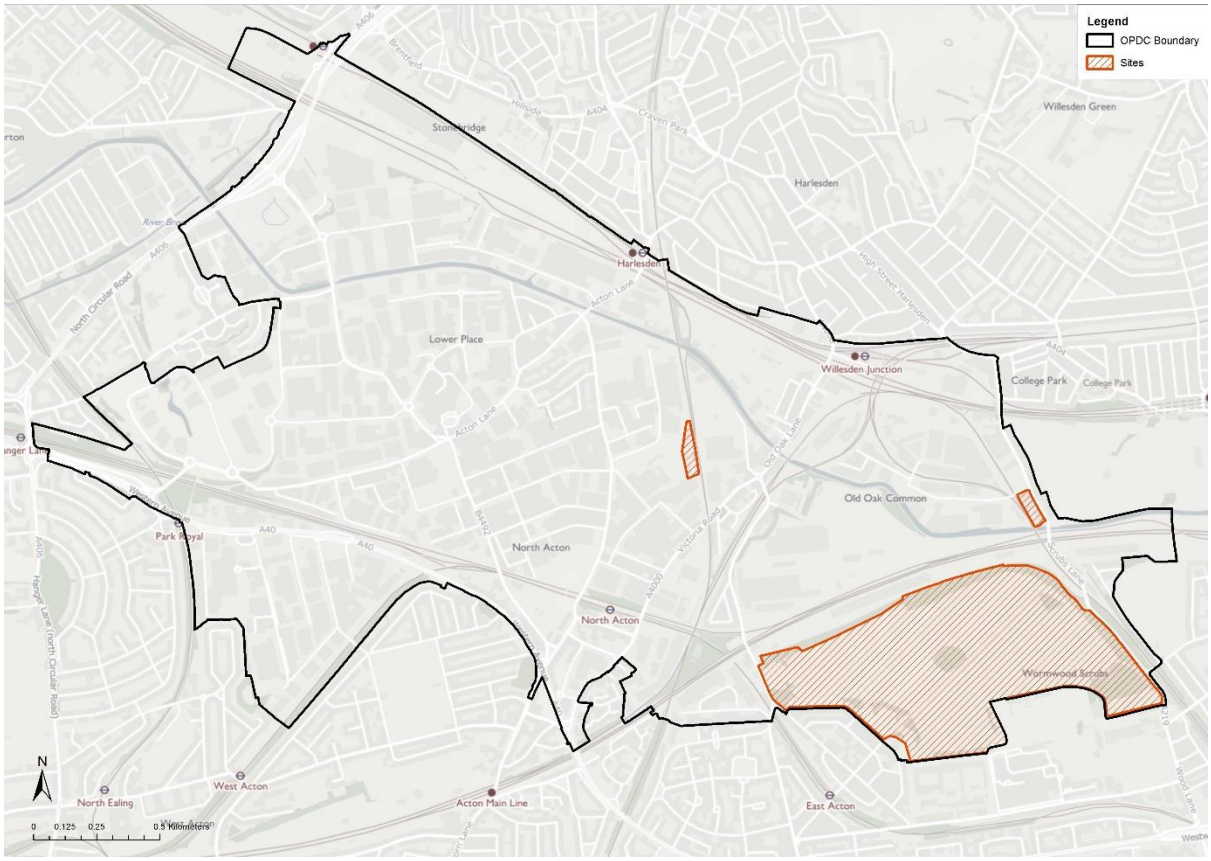
1. The existing Bashley Road Gypsy and Traveller Site within OPDC's area has been assessed for extra capacity for pitches;
2. "Scrubs Lane - waste land", identified in the Joint GTANA: it is assumed that this refers to the waste sites on Scrubs Lane known as Mitre Yard; and
3. "Scrubs Lane – grassland" and "Scrubs Park, Scrubs Lane", identified in the Joint GTANA: it Is assumed that this refers to Wormwood Scrubs.

6.2 The site assessments are summarised in the table below and shown in full in appendix 1.

Site ref	Suitability	Availability	Achievably	Conclusion and next steps
1	Not considered to be suitable for additional Gypsy and Traveller accommodation. The site is constrained by being contained within SIL which would prevent the site from being expanded. The shape of the site limits the ability to reconfigure to increase the number of pitches.	The site is available for Gypsy and Traveller accommodation.	Further pitch provision is not currently deliverable due to the physical constraints of the site being within SIL.	This is a fully occupied and existing site with no potential for additional pitches within the boundary and because there is no possibility to expand the site as it is located within SIL
2	The site is within the Old Oak Opportunity Area. The site has a minimum homes capacity of 200 in OPDC's Development Capacity Study. A permission has been agreed,	The site is unlikely to be available for development as Gypsy and Traveller accommodation as the site benefits from an extant planning permission and the developer wishes	The site is not achievable for Gypsy and Traveller accommodation. This is because the site benefits from an extant planning permission, is in the Old Oak	The site is not suitable, available and achievable. It has been identified as having a capacity to provide 200 homes in OPDC's Local Plan. It is part of the Old Oak Opportunity Area,

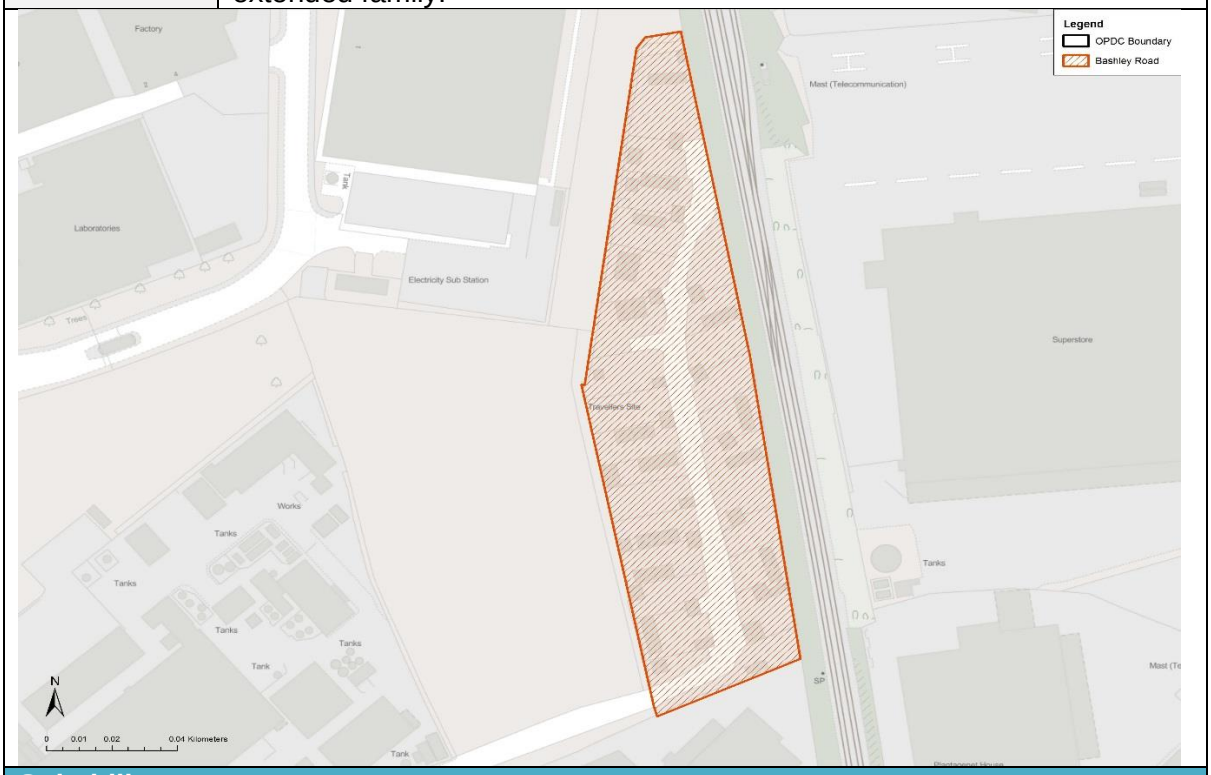
Site ref	Suitability	Availability	Achievably	Conclusion and next steps
	subject to legal agreement, for these homes to be delivered. The site is not therefore suitable for development as Gypsy and Traveller accommodation.	to comprehensively develop the site into 200 homes with non-residential floorspace and active frontages.	Opportunity Area and has a Local Plan site allocation for 200 homes.	which has a London Plan target to deliver 24,000 homes. The site has a planning permission, which can be reasonably be expected to be built out.
3	The site is not suitable for Gypsy and Traveller accommodation. It is protected as open space as designated MOL.	The site is not available for Gypsy and Traveller accommodation as it is MOL.	The site is not achievable for Gypsy and Traveller accommodation as it is MOL.	The site is not suitable, available or achievable. Wormwood Scrubs' roles are reflected in its designations and statutory protections.

Sites assessed for Gypsy and Traveller Accommodation



Appendix 1

Site ref: 1	Bashley Road Gypsy and Traveller Site, LB Ealing
Landowner	London Borough of Ealing
Agent	N/A
Site area (ha)	0.84 ha
Site origin	Existing Gypsy and Traveller accommodation site Desktop research/ OPDC GTANA
Estimated capacity	0 additional pitches, all pitches are currently occupied. There are 24 pitches in total. 1 pitch is currently acting as a double pitch for an extended family.

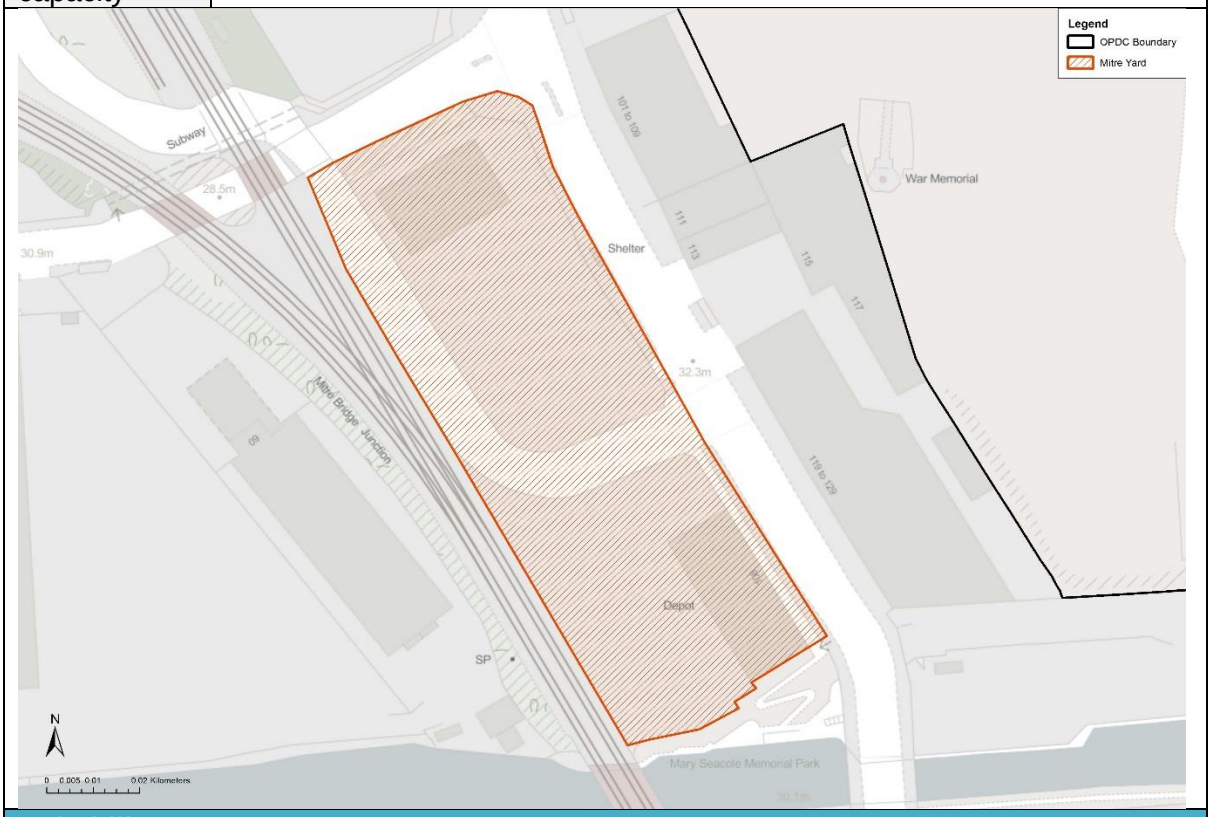


Suitability	
Existing use	This is an existing Public Gypsy and Traveller site which opened in 1985. It is situated within the London Borough of Ealing which owns the site and is managed on behalf of the council by Oxfordshire County Council.
Site description	The site is self-contained and within the Park Royal Industrial Estate Strategic Industrial Location (SIL). The site is surrounded by SIL Industrial uses and railway. Access is at the end of Bashley Road which has access to Chase Road which leads into North Acton town centre or North Acton Lane then Acton Lane which leads into Harlesden town centre.
Proximity to existing Gypsy and Traveller community and settled community	This is an existing site with an existing Gypsy and Traveller community living here. The nearest bricks and mortar residential area is the Wesley Estate, approximately 532m away.
National/London policy	Residential uses would not normally be appropriate on SIL land which is protected for industrial related uses in the London Plan.

Local Policy	Policy P4 protects the Bashley Road Gypsy and Traveller Site for its current use in line with Policy H8 on Gypsy and Traveller accommodation. The site is also protected by LB Ealing's extant Local Plan.
Planning History	Planning permission was granted in 1985 for its current use. https://pam.ealing.gov.uk/online-applications/propertyDetails.do?activeTab=relatedCases&keyVal=NOJREN00DT00S
Impact on local character / Townscape	The site is located within Park Royal West (Place Policy P4) which is in Park Royal SIL and is a location for a range of small, medium and large businesses. There are pockets of existing residential communities and planning permission has been granted for high density residential development at First Central which is in the Brewery Cluster to the southwest of Park Royal Centre and is outside of SIL.
Ecological and biodiversity impacts	Given the nature of the site, redevelopment would not have any significant ecological or biodiversity impacts.
Trees	There are no trees on the site.
Heritage	There is a limited number of historically significant buildings in the area and none are situated adjacent to the site.
Safety	The site is relatively isolated at the end of Bashley Road and surrounded by industrial uses which could cause personal safety concerns for residents at night.
Flooding and drainage	The south and north of the site is predicted to be at a risk of surface water flooding (1 x in 200-year surface water flood risk > 0.1m). Issues have been raised through the Local Plan consultation about how drainage on the site can be improved.
Access to local Services	Central Middlesex Hospital is approximately 1km away from the site. The nearest primary school is Old Oak Primary, approximately 1.3 km away and the nearest secondary school is Woodlane High School, approximately 2km away, both within LB Hammersmith & Fulham. The nearest shopping facilities are in North Acton town centre approximately 1km away. Employment opportunities can be found within Park Royal Industrial Estate.
Utilities infrastructure	The site is connected to utilities infrastructure.
Physical Constraints	Access to the site is constrained as there is only one route via Bashley Road. The site is narrow and constrained by railway on the east side. There is no potential for expansion beyond the existing boundary into the surrounding industrial uses as the area is protected within Park Royal SIL.
Public Transport	The Public Transport Accessibility Level (PTAL) rating is low: - 1b.
Air quality / noise	Given the industrial location there may be air quality and noise impacts for existing occupiers. Any development would have to comply with Local Plan policies
Suitability Conclusion	This site is not considered to be suitable for additional Gypsy and Traveller accommodation. The site is constrained by being contained within Park Royal SIL which would prevent the site from being expanded. The shape of the site limits the ability to reconfigure to increase the number of pitches.

Availability	
Is the site available for Gypsy and Traveller use?	LB Ealing owns the site and is supportive of its continued use as a Gypsy and Traveller site and has protected the site for its current use, as has OPDC.
Availability conclusion	The site is available.
Achievability	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	There are potential additional costs to be met by the landowner associated with implementing drainage mitigation measures and assessing air quality and noise mitigations. These are unlikely to raise significant costs or prevent development. Further pitch provision is not currently deliverable due to the physical constraints of the site being in Park Royal SIL.
When could the site be delivered?	N.A
Achievability conclusion	Further pitch provision is not currently deliverable due to the physical constraints of the site being in SIL.
Overall conclusion	**This is a fully occupied and existing site with no potential for additional pitches because there is no possibility to expand the site as it is located within the Park Royal protected SIL.**

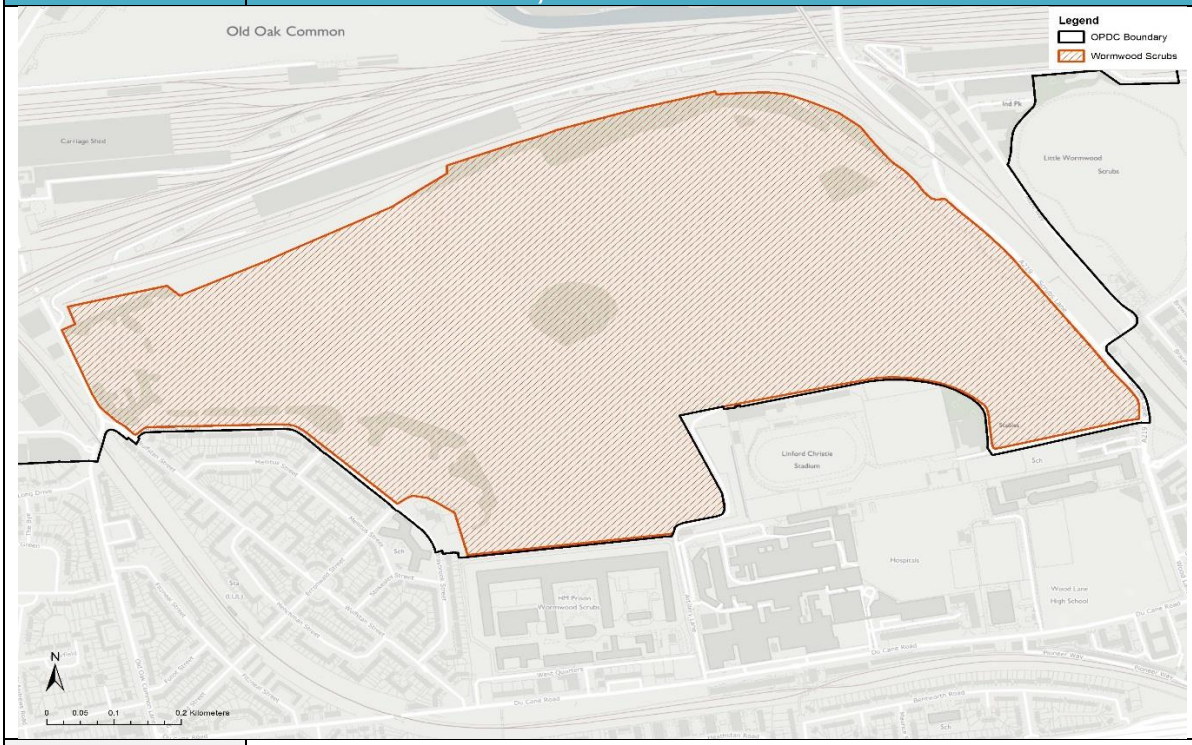
Site ref: 2	Waste Site know as Mitre Yard, LB Hammersmith And Fulham
Landowner	City and Docklands Ltd
Agent	Quod
Site area (ha)	0.58 hectares (0.53 hectares without access road)
Site origin	Joint GTANA
Estimated capacity	0 pitches



Suitability	
Existing use	Waste facilities comprising of a mixture of yard space and industrial buildings/structures.
Site description	The site comprises of two parcels of land located on the western side of Scrubs Lane. The sites are separated by a private service road, known as the haul road, used to access the Powerday and EMR sites. The service road also provides vehicular access to the southern parcel. The northern parcel is accessed directly from Scrubs Lane.
Proximity to existing Gypsy and Traveller community and settled community	The site is approximately 1.33km from the Bashley Road Gypsy and Traveller community and approximately 1.84km from Stable Way. The nearest bricks and mortar accommodation is at 45-57 Scrubs Lane and College Park, at approximate distances of 317m and 577m respectively.
National/London policy	The site currently falls within SIL. However, as set out in London Plan Policy 2.17 sites can be removed from SILwhere they are part of a strategically co-ordinated process of SIL consolidation. The site falls within the Old Oak Common Opportunity Area, which is identified in the London Plan as having significant regeneration potential with capacity to accommodate a minimum of 24,000 new homes and 55,000 jobs centred

	around a new public transport hub on the HS2 line, interchanging with the Great Western Main Line and Crossrail 1. OPDC's Local Plan is proposing to remove the SIL designation from the site and identify the site as a site allocation with the capacity for 200 homes.
Local Policy	The application site is not within the area proposed to be retained as SIL. Policy P10 of the Local Plan focuses on Scrubs Lane and supports the delivery of a range of mixed-use development to secure 1,100 new jobs and a minimum of 2,000 new homes along Scrubs Lane. The policy also supports the principle of developing clusters of active ground floor uses at key points along Scrubs Lane. The site falls partially within 2 clusters: Mitre Canalside and Hythe Road.
Planning History	Subject to legal agreement the site has permission for redevelopment for 200 homes (67 affordable homes – 35% by habitable room); 609sqm of flexible non-residential floor space http://planningregister.opdc.london.gov.uk/swift/apas/run/WPHAPPCRITERIA
Impact on local character / Townscape	The surrounding area is currently mainly industrial in character. However, the area has been identified as capable of delivering high density development. Gypsy and Traveller accommodation would be a different character and scale to this. The closest houses are approximately 360 metres to the north along Scrubs Lane beyond the Cumberland Park Factory Conservation Area. Policy P10 of the Regulation 19 Local Plan supports the delivery of a range of mixed-use development to secure 1,100 new jobs and a minimum of 2,000 new homes along Scrubs Lane. The North Kensington Gate sites (North and South) on the opposite side of Scrubs Lane have planning permission pending for 211 homes.
Ecological and biodiversity impacts	To the south the site is bound by Mary Seacole Memorial Gardens a public open space which fronts onto the Grand Union Canal at Mitre Yard.
Trees	There are no trees on the site.
Heritage	The site is situated close to the Cumberland Park Factory Conservation Area 360m to the north on Scrubs Lane.
Safety	There is a haul road between the plots which would be considered to have the potential to present a safety concern to pedestrians and cyclists. However, for the foreseeable future the haul road will not be a thoroughfare for pedestrians and cyclists and therefore this minor breach of the comfort criteria is considered acceptable.
Flooding and drainage	The site is in Flood Zone 1 which means it is at minimal risk from tidal and fluvial flooding. The main potential source of flooding is therefore from surface water.
Access to local Services	Hammersmith Centre for Health which is a primary care facility in Hammersmith Hospital is within 1 km. Two nurseries and four primary schools within 1km of the site. There is also an all-through school within 1km and three secondary schools just over 1km from the site. The Scrubs Lane area includes a target to secure 1,100 jobs. The closest shopping area is Harlesden town centre, approximately 1.2km to the north.
Utilities infrastructure	The site requires new connections to utilities infrastructure.
Physical Constraints	The two sites are separated by a haul road which is going to continue to be in operation to service the Powerday and EMR waste sites.

Public Transport	The current PTAL is 1B. The PTAL level of the site is expected to increase in the future because of planned rail improvements associated with the Old Oak Common HS2/Crossrail station as well as other public transport improvements in the area.
Air quality / noise	The operation of the access road could cause noise and vibration issues for future occupiers which would need to be mitigated by internal noise standards such as glazing. In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF Environmental Health officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development to ensure that appropriate air quality is provided for future residents.
Suitability Conclusion	The site has a minimum homes capacity of 200 in OPDC's Development Capacity Study. A permission has been agreed, subject to legal agreement, for these homes to be delivered. The site is not suitable for development as Gypsy and Traveller accommodation.
Availability	
Is the site available for Gypsy and Traveller use?	The landowner is willing to comprehensively develop the land for residential led, mixed use high density development as evidenced in the Mitre Yard planning application.
Availability conclusion	The site is unlikely to be available for development as Gypsy and Traveller accommodation as the developer wishes to comprehensively develop the site into 200 homes with non-residential floorspace with active frontages.
Achievability	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	The site is complex and there are site constraints to overcome, including air quality and noise as described above. Given the current uses substantial remediation work would be required to develop the site. Whilst these may be overcome there is no market attractiveness for the delivery of Gypsy and Traveller accommodation on this site for the landowner/developer.
When could the site be delivered?	If is unlikely that the site could be delivered for Gypsy and Traveller accommodation due to the housing targets assigned to this site.
Achievability conclusion	The site is not achievable for Gypsy and Traveller accommodation.
Overall conclusion	**The site is not suitable, available and achievable. It has been identified as having a capacity to provide 200 homes as part of OPDC's Local Plan and is within the Old Oak Opportunity Area, which the London Plan identifies as having capacity to deliver 24,000 homes and 25,000 jobs, requiring a high-density approach to development. The site has planning permission which can be reasonably be expected to be built out.**

Site ref: 3	Wormwood Scrubs, LB Hammersmith And Fulham
	
Landowner	London Borough of Hammersmith and Fulham, managed by Wormwood Scrubs Charitable Trust
Agent	N/A
Site area (ha)	67 ha
Site origin	Joint GTANA
Estimated capacity	N/A
Suitability	
Existing use	Publicly accessible open space, Metropolitan Open Land (MOL)
Site description	At 67 hectares, Wormwood Scrubs is the London Borough of Hammersmith and Fulham's largest open space. The Scrubs has about 18 hectares of tree cover and 22 hectares of long grass meadow with almost 100 species of birds and 250 species of wildflowers (one sixth of the UK flora). Leisure facilities include play areas, walking/ cycling routes, sports pitches. Scrubs Lane is to the north and east. Little Wormwood Scrubs is east of Scrubs Lane and the Linford Christie Stadium, Hammersmith Hospital and HM Prison Wormwood Scrubs are located to the south. Old Oak Lane and Braybrook Street border the site to the west and southwest, Scrubs Lane borders to the east. Railway depots are located to the north,
Proximity to existing Gypsy and Traveller community and settled community Is the site in an isolated area?	The site is approximately 1 km away from existing Gypsy and Traveller site in Bashley Road and approximately 1.74 km from the Joint RBKC/LBHF site in Stable Way. The nearest bricks and mortar accommodation is located at East Acton and North Kensington. 650 and 850 metres away.

National/London policy	NPPF Green-belt policy applies (para 79): to prevent urban sprawl by keeping land permanently open and to enhance the beneficial use, such improving access; opportunities for outdoor sport and recreation etc. Construction of new buildings is inappropriate. The London Plan Policy 7.17 affords MOL the same protection as Green-belt, The Ministry of Defence retains rights of use of the land for military training purposes. The Wormwood Scrubs Act 1879 sets out provisions to ensure the open space is made available in perpetuity for all Londoners.
Local Policy	In accordance with Local Plan Policy EU1 the Scrubs will continue to be protected as publicly accessible open space serving a variety of functions. The site is Identified as a place in Policy P12. Any proposals for enhancements (e.g.: to improve accessibility) need to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith And Fulham.
Planning History	N/A
Impact on local character / Townscape	The site has about 18 hectares of tree cover and 22 hectares of long grass meadow. Development would not accord with guidance on protecting the character of MOL and nature reserves.
Ecological and biodiversity impacts	The site has about 18 hectares of tree cover and 22 hectares of long grass meadow with almost 100 species of birds and 250 species of wildflowers (one sixth of the UK flora). Areas are specifically designated as Local Nature Reserves such as Braybrook Woods, Martin Bell's Wood and the Central Woodland Copse.
Trees	18 hectares of tree cover
Heritage	There are no identified heritage assets within the vicinity of the site.
Safety	As public open space and isolated in places personal safety could be a concern to users at night-time.
Flooding and drainage	The site is not located in National Flood Zone 2 or 3 but there are pockets of surface water flood risk (1 x in 200-years).
Access to local Services	There is a community centre located within the curtilage of Wormwood Scrubs in the south-west corner. Hammersmith Hospital and Queen Charlottes' and Chelsea Hospital are located to the south. Ark Burlington Danes Primary School and Kensington Aldridge Academy are located to the south. Old Oak Primary School is located to the southwest. There are employment opportunities in Park Royal to the west.
Utilities infrastructure	There is no access to utilities infrastructure as it is public open space.
Physical Constraints	N/A site is not appropriate for development.
Public Transport	Public transport access is poor, with the area's PTAL rating ranging from 0 to 1b. Nearest Underground station is to the southwest is East Acton, approximately 500m away.
Air quality / noise	N/A site is not appropriate for development.
Suitability Conclusion	The site is not suitable. It is protected as public open space as designated Metropolitan Open Land and a Metropolitan Park in the Mayor of London's Green Grid. Development would not accord with guidance on protecting and maintaining MOL.

Availability	
Is the site available for Gypsy and Traveller use?	The site is not available for development as a Gypsy and Traveller site. It is protected in the London Plan and Local Plan as Metropolitan Open Land and benefits from its own Act of Parliament given it further protection.
Availability conclusion	The site is not available for development.
Achievability	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	The site is not deliverable as a Gypsy and Traveller site. It is protected in the London Plan and Local Plan as Metropolitan Open Land.
When could the site be delivered?	The site is not deliverable
Achievability conclusion	The site is not achievable for development
Overall conclusion	**The site is not suitable, available or achievable. Wormwood Scrubs' roles are reflected in its designations and statutory protections.**