

Draft New London Plan Examination in Public

Statement of LB Camden

M21. Does Policy H16 make adequate provision for meeting the need for gypsy and traveller accommodation including pitch provision and monitoring?

Camden Council's formal response to the draft London Plan indicated that the provisions in criteria A and D of Policy H16 are not appropriate or consistent with national policy.

The minor suggested changes published in August 2018 do not address our concerns in relation to Policy H16. Consequently, the Council asks the Panel to consider its original representations on Policy H16 in the context of Matter 21.

Camden Council also shares the concerns raised by other London Boroughs, notably the London Boroughs of Lambeth and Newham.

a) Is Policy H16 a justified strategic framework for the preparation of local plans? Should accommodation assessments be undertaken at Borough level or should this be done London-wide?

[... see also b) below]

c) Is sufficient account taken of the need for temporary stopping places?

[...]

We do not believe Policy H16 is a justified strategic framework.

It seeks to impose two different interpretations of the need for accommodation for gypsies and travellers.

One (in new table 4.4A) is the outdated London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008 (GTANA 2008) – the projected need covered the period 2007-2017. No justification is provided for relying on outdated evidence rather than commissioning a new London-wide study of needs.

The other attempts to depart from and broaden the definition of gypsies and travellers in the national Planning Policy for Traveller Sites (PPTS). No justification is provided to explain why the specific circumstances of London warrant a broader definition of need.

Camden Council considers that the need for and the distribution of new traveller provision should ideally be considered on a pan-London basis, for three reasons:

- given high land values and variable land availability across London, many London Boroughs may well be unable to meet local needs, and an approach similar to the London SHMA and London SHLAA is the only strategy likely to be effective in meeting need;
- many boroughs have already undertaken needs assessments on the basis of the PPTS, and begun planning for pitch provision on the basis – it would be unreasonable and wasteful of public resources to require them to undertake new assessments where an up-to-date assessment is in place; and
- the need for temporary stopping places can only be considered on a pan-London basis – the GTANA 2008 found a need for 40 'transit' pitches London-wide, and suggested one transit site for each of 5 sub-regions – clearly this need could not be meaningfully derived on a borough-by-borough basis.

Furthermore, because of the high land values and variable land availability across London, many London Boroughs already struggle to meet traveller needs on the basis of the PPTS definition. If the GLA wishes to make provision for groups outside the PPTS definition, GLA resources will be required to assess and meet this need.

b) Is it justifiable to have a different definition to that in Annex 1 of the Planning Policy for Traveller Sites for gypsies and travellers in London?

Camden Council does not consider that the use of a distinct London Plan definition is justified, and does not think it will be effective. The broader definition would lead to a much larger assessment of needs than can feasibly be met. The effect of a much larger need would be to worsen the prospect of pitches being delivered for those travellers who do meet the PPTS definition, and also reduce the ability of boroughs to deliver the housing needed for a range of other groups.

Camden Council can see no logic in adopting a broader definition of need in London when London is among the areas with the very highest land values in the country, the highest housing needs amongst other groups, and the greatest challenges to meeting the needs of travellers.

The 2011 Census counted 8,196 usual residents who identified as gypsies or Irish travellers. The GLA estimate (presumably based on their definition) suggests that there are 30,000 gypsies and travellers in London, potentially all requiring pitches.

Camden estimates that the maximum pitch density for travellers accommodation would be 60 per hectare, and other London Boroughs have suggested it could be as little as half of this (LB Lambeth has suggested a maximum provision of 28.5 pitches per hectare). Provision of large numbers of pitches at such low densities would have a significant impact on the ability to meet overall housing needs across London.

Camden has also estimated that the cost of land needed for each pitch could be £830,000 to £950,000, compared with weekly rents of £65 per pitch. Provision of new each new pitch in Central London will require a massive input of public funding. A requirement for large numbers of pitches at such a cost is simply not deliverable.