

Update on Gypsy, Traveller and
Travelling Showpeople
Accommodation Assessment (GTAA)
(2018)

July 2021

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1 Introduction

- 1.1.1 On behalf of the West London Alliance the Council commissioned ORS consultants to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) and provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the London Boroughs of Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow. Whilst Hillingdon and Hounslow were not included in the commission, ORS have recently completed GTAAs for them using the same methodology so the outcomes of their GTAAs have been integrated in the report to provide a fuller picture of need for the area covered by the West London Alliance.
- 1.1.2 The methodology used by ORS was fully in line with Planning Policy for Traveller Sites (PPTS) in August 2015 which sets the definition of Travellers for planning purposes. ORS are leaders in the field of producing GTAAs for local planning authorities across England.
- 1.1.3 Within Barnet the Council undertook public consultation on the draft Local Plan (Regulation 18) for 7 weeks between January - March 2020. Several representations were submitted to the Council during this consultation stage of the Local Plan process which related directly to the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (WLA) (GTAA) (2018).
- 1.1.4 Considering these representations relating to the GTAA (2018), further evidence has been gathered.

2 Responses to the draft Local Plan (Regulation 18)

- 2.1.1 Through the Local Plan consultation respondents have highlighted reports of unauthorised encampments in Barnet throughout 2019. Respondents also claim that the evidence base and policy have been unsoundly produced.
 - One respondent highlighted that evidence base and policy have been unsoundly produced and will be challenged if the Council do not act more responsibly and equitably as a London borough with shared responsibilities for the city. The respondent claimed that ‘there have been decades of well-documented discrimination and racism against these groups from the political leadership of Barnet’. The respondent claimed that the Council ‘are simply perpetuating that and that the earliest possible provision within the Growth Areas should occur, to allow early and stable links to be made within the wider incoming communities, and to provide early school-settlement, job and training opportunities.’
 - Another resident questions the derivation and accuracy of the statement in the GTAA that there were no Gypsies, Travellers or Travelling Showpeople identified to interview in Barnet. Representor states that she visited a site of five caravans, parked in the car park of Bethune Park in N11 on December 6th, 2019. Provides data from the Next Door App between May and December 2019 covering ‘South Whetstone’ citing evidence that Travellers had been resident in the Borough during this seven month period and suggest that this information will also be available to the Safer Neighbourhood Team, the Courts, the local Councillors and local MP who was also lobbied for their removal.

- 2.1.2 There was support from LB Enfield for the general approach taken by Barnet subject to ongoing conversations and discussions surrounding need. LB Haringey highlighted the Mayor of London's draft 2017 London Plan definition for Gypsies and Travellers which is different from the Government's definition which is the one that underpins this GTAA. The Mayor's definition of Gypsies and Travellers has been removed from the final London Plan, published in March 2021.
- 2.1.3 The Mayor of London's response did not challenge the definition of Gypsies and Travellers that underpins this GTAA. He noted the assessment found no demand for pitches and highlighted that 2011 census data suggests there is a small population of gypsies and travellers in Barnet. The Mayor also would welcome a proactive approach for any sites that come forward that could help address need arising in the West Alliance boroughs.

3 Policy Framework

3.1 London Plan

- 3.1.1 The London Plan was adopted 2nd March 2021 and sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 3.1.2 The draft London Plan (2017) was subject to Examination in Public between January and May 2019 and the Inspector's Report was published in October 2019. The Inspector recommended the removal of the Plan's definition of 'Gypsies and Travellers' as it was inconsistent with national policy set out in the Planning Policy for Traveller Sites (PPTS) (2015) and the Mayor failed to demonstrate that London was so distinctly different to elsewhere in the country to justify a departure from national policy.
- 3.1.3 The GTAA (2018) did suggest that it would be likely that the application of the draft London Plan planning definition would significantly increase levels of need arising from gypsies, travellers and travelling showpeople. However, as that definition has now been removed by the Inspector, it is considered reasonable for Barnet to continue to apply the currently accepted definition as set out in the PPTS (2015).
- 3.1.4 The Inspector also recommended that the Mayor prepare a London-wide accommodation need assessment for gypsies and travellers. This cannot be taken into consideration until it has been published.
- 3.1.5 Policy H14 of the London Plan (2021) states that Boroughs who have not undertaken a needs assessment since 2008 should use the figure of need provided in Table 4.4 of the London Plan (2021). The figure in Table 4.4 is based on an assessment carried out in 2008 and sets out a need for 8 pitches in Barnet. The London Plan states that those boroughs that have undertaken a needs assessment since 2008 should update this as part of their Development Plan review process.
- 3.1.6 Furthermore, the London Plan states that Boroughs should undertake an audit of existing sites and pitches, identifying:
 - 1) Areas of overcrowding
 - 2) Areas of potential extra capacity within existing sites

- 3) Pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping)

3.2 Local Plan

- 3.2.1 The Council is now at the Regulation 19 stage.
- 3.2.2 The GTAA identified no current or future need in Barnet for pitches or plots for gypsy and traveller households as well as travelling showpeople. The Council is committed to working with the Mayor of London on a London-wide Gypsy and Traveller accommodation needs assessment. Further the Council acknowledges that insufficient pitch provision can contribute to a rise in unauthorised encampments, with implications for the health and well-being of Gypsies, Travellers and Travelling Showpeople. The PPTS suggests the use of a criteria-based policy for any unknown households that provide evidence that they meet the PPTS planning definition.
- 3.2.3 Policy HOU07 Gypsies, Travellers and Travelling Showpeople of the Regulation 19 Publication Local Plan is as follows:

The Council can demonstrate that there is no objectively assessed need for pitches and plots for Gypsies and Travellers and Travelling Showpeople households.

Any proposals for such accommodation that do come forward will be considered on the basis of ensuring:

- a) Close proximity to a main road and safe access to the site with adequate space on site to allow for the manoeuvring of vehicles.
- b) Reasonable access to local shops and other community facilities, in particular schools and health care.
- c) Scale of the site is in keeping with local context and character.
- d) Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.
- e) Any use on the site does not have any unacceptable adverse impacts on neighbouring residents.
- f) Appropriate facilities must be provided on-site, including water and waste disposal.

4 Updated Evidence

4.1 Barnet Enforcement

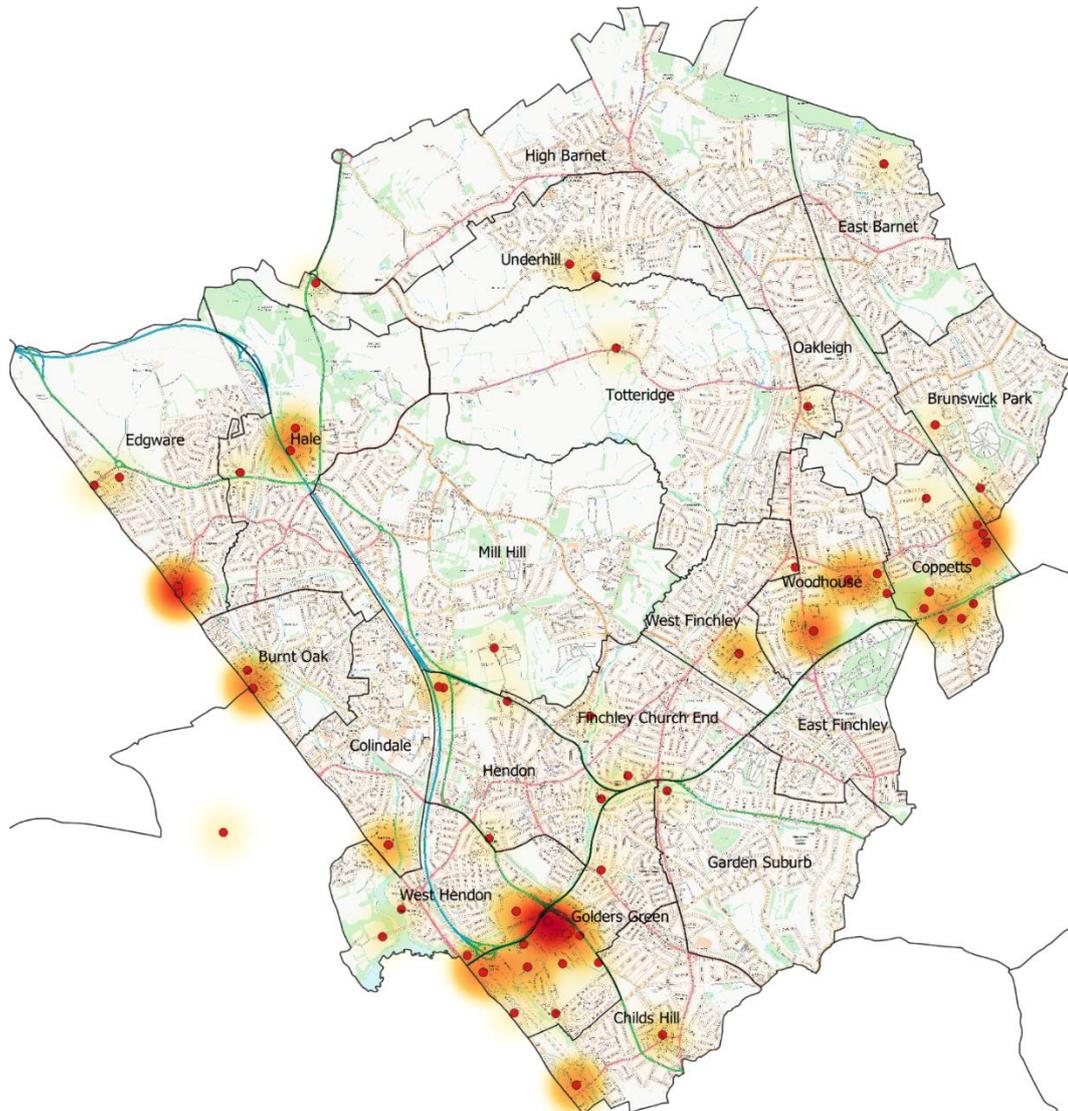
- 4.1.1 There have been four records of complaints made to the enforcement team since 2017, where in three instances travellers had moved on within a matter of hours/days as no encampment was witnessed. In one confirmed instance of an unauthorised encampment, enforcement action was taken.

4.2 Barnet Community Safety

4.2.1 Data from the Council’s Community Safety team shows the number of unauthorised encampments between April 2018 – June 2020. These were all geo-located and timestamped. It has been recognised that the majority of the reported encampments have predominantly been the same two to three groups and this appears to happen on a seasonal basis. Given that there are few if any encampments over the winter months the evidence suggests that these households have a permanent base elsewhere. Unauthorised encampments per month during this period is set out in the table below. The Council will continue to monitor and report this activity as part of the Local Plan evidence base.

	2018	2019	2020
January	-	3	1
February	-	0	1
March	-	1	1
April	1	0	0
May	5	3	0
June	3	8	3
July	0	3	-
August	10	7	-
September	4	9	-
October	14	8	-
November	7	6	-
December	3	3	-
Total	47	51	3

- 4.2.2 The number of unauthorised encampments is high for both 2018 and 2019, with a higher proportion of encampments during the summer and autumn months. Such seasonal visits to the same area may be for work purposes.
- 4.2.3 The locations of these encampments during April 2018 – June 2020 are shown on the map below. This shows the hotspots for where these encampments occur; namely to the south of the Borough around Golders Green and Brent Cross and to the east of the Borough in Coppetts ward.



4.3 Evidence Analysis

- 4.3.1 The GTAA (2018) stated that Barnet is unaware of any recent short-term unauthorised encampments. Information from the Council's Community Safety Team updates this.

- 4.3.2 The ethnicity question in the 2011 Census included for the first time ‘Gypsy and Irish Traveller’ as a specific category. Within Barnet the Census recorded 51 households living in ‘bricks and mortar’ accommodation who identified themselves as Gypsy or Irish Traveller. More up to date figures from the 2021 Census are not expected to be available until 2023. The Mayor’s original definition in the 2017 draft London Plan included those gypsy and traveller households who currently live in bricks and mortar dwellings whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in a permanent dwelling. This definition has now been removed. Although no reference is made to it in the London Plan, national policy and definition as set out in the Planning Policy for Traveller Sites (PPTS) (2015) still holds sway.
- 4.3.3 Despite the deletion of the draft London Plan definition the evidence on gypsy and traveller households within bricks and mortar accommodation is still relevant. The consultants (ORS) who produced the GTAA applied a rigorous approach to making contact with bricks and mortar households. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the Councils and housing providers, and adverts on social media (including the Friends Families and Travellers Facebook group). Assistance was also sought from London Gypsies and Travellers (formerly the London Gypsy and Traveller Unit).
- 4.3.4 Across the West London study area a total of 88 interviews were completed with Gypsies and Travellers and 42 interviews were completed with Travelling Showpeople living on authorised and unauthorised sites and yards. In addition, stakeholder engagement was undertaken and total of 14 telephone interviews were completed. Despite the success in identifying gypsies and travellers across West London ORS did not in 2018 identify gypsy and traveller households in Barnet including the 51 ‘bricks and mortar’ households identified in the 2011 Census..
- 4.3.5 Over 120 GTAA studies completed by ORS since 2015 have identified low numbers of households in bricks and mortar who could demonstrate a need to move to a pitch on a site as opposed to having a desire to move to a pitch on a site. This requires an assessment of need to identify a degree of cultural/psychological aversion to living in bricks and mortar, or other aspects that could suggest a need to move such as over-crowding, or households that have been forced to move off sites due to over-crowding on pitches. This broad approach was applied in the 2018 GTAA when completing the assessment of need from households living in bricks and mortar.
- 4.3.6 The London Plan (2021) acknowledges insufficient pitch provision can lead to a rise in unauthorised encampments and that suitable short-term sites are an important component of the suite of accommodation for gypsy and travellers. Research is currently underway to understand how a ‘negotiated stopping’ approach could work in London as a way of minimising the number of unauthorised encampments.

5 Conclusion

- 5.1.1 The Council considers that the 2018 GTAA and Update provides a credible evidence base to support policies in the Local Plan and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots up to 2041 with a split to 2033 as required by the PPTS. The outcomes of this study supersede the need figures of any previous Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments completed in the study area.

- 5.1.2 The methodology used by ORS is fully in line with Planning Policy for Traveller Sites (PPTS) in August 2015 which sets the definition of Travellers for planning purposes. ORS are very experienced consultants and are leaders in the field of producing robust GTAA's for local planning authorities across England.
- 5.1.3 The 2018 GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the wider West London study area through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites.
- 5.1.4 Across the West London study area a total of 88 interviews were completed with Gypsies and Travellers and 42 interviews were completed with Travelling Showpeople living on authorised and unauthorised sites and yards. In addition, stakeholder engagement was undertaken and total of 14 telephone interviews were completed. Despite the ORS did not identify gypsy and traveller households in Barnet. Despite using a range of techniques to establish contacts across West London and success in identifying gypsies and travellers in the other boroughs none of the 2011 Census 'bricks and mortar' households in Barnet were identified for interview as part of the 2018 GTAA.
- 5.1.5 The Council has revisited the evidence underpinning the 2018 GTAA and has identified the unauthorised encampments highlighted by respondents to the Regulation 18 consultation. This evidence is more up to date than the evidence underpinning the London Plan.
- 5.1.6 The Council is committed to working with the Mayor of London on updating this evidence as part of a London-wide Gypsy and Traveller accommodation needs assessment.