

# Assessment of Gypsy and Traveller accommodation need in Lambeth

## Bringing together the evidence (October 2017)

### 1. Introduction

- 1.1 The national Planning Policy for Traveller Sites (PPTS 2012, updated 2015) sets out that local planning authorities should make their own assessment of need for the purposes of planning, develop fair and effective strategies to meet need through the identification of land for sites, and plan for sites over a reasonable timescale.
- 1.2 This summary document has been published alongside the Lambeth Strategic Housing Market Assessment (SHMA) 2017 to inform the partial review of the Lambeth Local Plan 2015. It brings together information relating to Gypsy and Traveller accommodation need in the London Borough of Lambeth, and should be read in conjunction with the Lambeth Gypsy and Traveller Accommodation Assessment 2014 and Lambeth Gypsy and Traveller Accommodation Assessment Update 2016.
- 1.3 The final section of this document addresses how the identified need for Gypsy and Traveller accommodation in Lambeth can be met.

### 2. Local context

- 2.1 There is one existing Traveller site in Lambeth, located at Lonesome Way in Streatham Vale. The site provides 16 residential pitches, and is owned and managed by Lambeth Council. The site was originally established in the late 1970's. Refurbishment works were carried out in 2014/15, which included the creation of an additional pitch.
- 2.2 The council is not aware of any specific Gypsy and Traveller households living in bricks and mortar housing in the borough. It is widely acknowledged that Gypsy and Traveller households residing in bricks and mortar housing are often hard to reach. The council and external consultants sought, through the Gypsy and Traveller Accommodation Assessments, to identify as many households as possible through contacts derived from persons living on the existing site, council intelligence and data, and generally publicising the research.

### 3. Policy context

#### *National planning policy*

- 3.1 National planning policy set out in the PPTS, first issued in 2012, requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of their area. To set these targets local authorities should prepare and maintain an up-to-date understanding of accommodation need using a robust evidence base.
- 3.2 An update to the PPTS in August 2015 revised the definition of Gypsies and Travellers for the purposes of planning. This had the effect of excluding those who have ceased to travel permanently.

3.3 For the purposes of the PPTS (as amended August 2015), ‘Gypsies and Travellers’ are defined as:

“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.”

3.4 In determining whether persons are “Gypsies and Travellers” in this context, the PPTS states that 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.

3.5 Under the PPTS planning authorities are therefore required to assess the accommodation needs of Gypsies and Travellers, as defined in national planning policy. Following a High Court judgment (*Wenman v Secretary of State*) the government, on 22 July 2015, made a technical adjustment to paragraphs 49 and 159 of the NPPF. The technical adjustment to paragraph 159 stated: “Planning Policy for Traveller Sites sets out how ‘Travellers’ (as defined in Annex A of that document) accommodation needs should also be assessed. Those who do not fall under that definition should have their accommodation needs addressed under the provisions of the National Planning Policy Framework.”

*The London Plan 2016 (consolidated with alterations since 2011)*

3.6 The London Plan 2016, Policy 3.8 (i) states that boroughs should ensure that “the accommodation requirements of Gypsies and Travellers (including Travelling Showpeople) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.”

3.7 The supporting text goes on to state that assessing levels of genuine local need, deciding on the level and location of suitable provision to meet that need and carrying out the necessary consultation with relevant communities and stakeholders is far more effectively done locally. It advises that, both because of the level of locally-specific detail involved and the scale of the issue (relative to London’s other strategic housing needs), the Mayor agrees with national government that boroughs should work with Gypsies and Travellers and other stakeholders to identify local needs for temporary and permanent sites, and develop and effective strategies to meet need through the identification of land for sites through their LDFs as set out in accordance with national guidance.

*The Lambeth Local Plan 2015*

3.8 The Lambeth Local Plan 2015, Policy H10, safeguards Lambeth’s existing Gypsy and Traveller site at Lonesome Way and states that the council will seek to identify a new site(s) for additional facilities to meet the accommodation needs of Gypsies and Travellers over the lifetime of the plan. It also sets out a criteria-based policy to guide decisions on planning applications for new sites. The Local Plan 2015 does not set a target for pitch provision and

does not identify a supply of land to meet future need. This needs to be addressed in the Local Plan Review.

#### **4. Assessment of Gypsy and Traveller need in Lambeth**

- 4.1 Lambeth's previous target for Gypsy and Traveller pitches was set out in the Lambeth Core Strategy 2011. This identified a requirement for 10 additional pitches over the plan period, based on the findings of the 2008 London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (GTAA) (Fordham Research, March 2008) carried out to inform the evidence base for the replacement London Plan.
- 4.2 The council appointed consultants Opinion Research Services (ORS) to undertake a local GTAA, which was published in June 2014. The needs assessment was updated by ORS in 2016 to take account of the change in national policy to the definition of a Traveller made in August 2015. Because the 2014 GTAA concluded that the only source of need was that arising from concealed households and new household formation on the Lonesome Way site, the study update addressed the application of the new definition to households on the existing Traveller site, in accordance with the PPTS 2015.
- 4.3 In addition to the need arising from concealed households and new household formation attributed to the existing Traveller site, the 2014 GTAA methodology identifies a number of other elements of current and future need for pitches and plots for Gypsies, Travellers and Travelling Showpeople, which is consistent with the 2007 CLG guidance for undertaking such assessments<sup>1</sup> and draft national guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats published in March 2016<sup>2</sup>.
- 4.4 The components of current and future need for pitches and plots for Gypsies, Travellers and Travelling Showpeople, and the conclusions relating to need arising from these are set out below.

##### Concealed households and net new household formation arising from occupants of the existing site

- 4.5 This was assessed through a survey carried out for the 2014 GTAA and updated in 2016 to take account of the change in national policy to the definition of a Traveller made in August 2015.
- 4.6 The 2014 GTAA demonstrated a need for 11 additional pitches in Lambeth over the period 2014 – 2030, arising through concealed households (three pitches) and new household formation (eight pitches). A supply of three pitches was identified, with there being two vacant pitches and one new pitch due to be completed on the Lonesome Way site. The identified net requirement to 2030 was therefore reduced to eight pitches.

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<sup>1</sup> Gypsy and Traveller accommodation needs assessments, Department for Communities and Local Government, 4 October 2007

<sup>2</sup> Review of housing needs for caravans and houseboats: draft guidance, Department for Communities and Local Government, 11 March 2016

- 4.7 As the 2014 GTAA concluded that the only source of need was that arising from concealed households and new household formation on the Lonesome Way site, the 2016 update addressed the application of the new definition to households on the existing Traveller site. The consultants sought to re-interview the residents of Lonesome Way to capture additional information to inform an assessment as to whether a household would fall under the revised PPTS definition.
- 4.8 The findings are summarised below. The full report has been published separately ('London Borough of Lambeth Gypsy and Traveller Accommodation Assessment Update', ORS, September 2016).
- 4.9 The consultants sought to undertake a full demographic study of all occupied pitches on the site. Since the 2014 GTAA a revised site record form has been developed by ORS to be used in interviewing households. The revised form captures additional information to inform an assessment as to whether a resident would have 'Traveller status' for the purposes of applying national planning policy. Pitches were visited by experienced ORS researchers who conducted interviews with as many residents as possible to determine their current demographic characteristics, whether they have any current or likely future accommodation needs and how these may be addressed, whether there are any concealed households or doubling-up, and their travelling characteristics. Staff also sought to identify contacts living in bricks and mortar to interview.
- 4.10 Thirteen of the 16 pitches on the Lonesome Way site were occupied when the site visits were undertaken. Through the interviews data was collected for households living on six of the 13 occupied pitches. Two households refused to take part in an interview, and despite repeated visits and engagement with site managers and caretakers it was not possible to make contact with households on a further five pitches.
- 4.11 The fieldwork found that none of the six households who were interviewed led a nomadic lifestyle – they do not travel for work purposes and have not ceased to travel temporarily. In accordance with national policy, the housing needs of these households have been assessed and will be planned for as part of the wider housing needs of the area.
- 4.12 As mentioned, it was not possible to interview residents on seven of the pitches at Lonesome Way or therefore ascertain whether they meet the government's Traveller definition set out in the PPTS. The total number of additional pitches that would be required to address the potential requirements of these seven households is three, based on application of the national household formation rate.

#### Other components of need

##### *Travelling Showpeople*

- 4.13 This was assessed in the 2014 GTAA, which identified no existing sites for Travelling Showpeople in Lambeth and no indication of local unmet need (although it was noted there are clear wider regional and national needs). There is no evidence to suggest the position has changed since 2014. While there are a number of fairs, circuses and shows held regularly

in the borough's open spaces, there is no indication of any need specifically within the borough for pitches to meet their seasonal working needs.

*Developments with temporary permission and unauthorised developments<sup>3</sup>*

- 4.14 This was assessed in the 2014 GTAA, which identified no sites with temporary permission or unauthorised developments. There are still no such sites in Lambeth.

*Unauthorised encampments<sup>4</sup>*

- 4.15 The 2014 GTAA did not identify any unauthorised encampments. More recently, officers have been made aware of a number of incidences of unauthorised encampments in the borough. Between 2011 and 2016 there have been 16 known unauthorised encampments in the borough – nine of which took place on Streatham or Clapham Common. Seven other incidences occurred on sites in private ownership.
- 4.16 Based on the information available, it is not considered that the unauthorised encampments indicate a need for any permanent transit provision, or a demand for permanent pitches in Lambeth. They were short term and transient in nature and there is no evidence of 'repeat incursions' from the same groups of people. Further, there is no record of any approaches to the council by members of the Gypsy and Traveller community regarding unmet need for permanent or transit provision.
- 4.17 The issue of unauthorised encampments was discussed at a meeting held between other South West London boroughs in October 2016. It was agreed that boroughs would share information in this regard, both to promote joint working and good practice in recording and dealing with incidences and so that further discussions can be held surrounding the extent to which unauthorised encampments may be indicative of a need for permanent or transit accommodation at a sub-regional level.

*Movement from bricks and mortar*

- 4.18 This was assessed in the 2014 GTAA. ORS worked with stakeholders, the council and site residents to identify households in bricks and mortar housing. The study identified no net need arising through movement from bricks and mortar accommodation. The 2016 study update sought to identify further contacts in bricks and mortar accommodation to interview, however no contacts were forthcoming. There have been no approaches by residents to the council expressing a need to live in a caravan.

*Net migration*

- 4.19 This was assessed in the 2014 GTAA and revisited through the 2016 Update. The study found no households in Lambeth wishing to move to sites elsewhere in the country and the methodology adopted an assumption of nil net migration.

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<sup>3</sup> An 'unauthorised development' refers to the occupation of land which is owned by the gypsies and travellers themselves, but for which they do not have planning permission to use for residential purposes.

<sup>4</sup> An 'unauthorised encampment' refers to the unauthorised occupation of land which is not owned by the gypsies and travellers.

Table 1: Overall summary of Gypsy and Traveller need in Lambeth

Category of gypsy and traveller need	2016-21	2021-26	2026-31	Total
Arising from Travelling Showpeople	0	0	0	0
Arising from existing unauthorised developments	0	0	0	0
Arising from existing unauthorised encampments	0	0	0	0
Arising from existing sites with temporary permission	0	0	0	0
Arising from net movement from bricks and mortar	0	0	0	0
Net migration	0	0	0	0
Concealed households	0	0	0	0
Net new household formation	1	1	1	3

## 5. Meeting the identified need

- 5.1 The 2016 GTAA Update found that six households that do not meet the planning (PPTS) definition of a Traveller are likely to be in need of accommodation over the 15 year period to 2031. This need arises from concealed households and new household formation. The needs of these households will form a component of the objective assessment of housing need figure.
- 5.2 The total number of additional pitches required to address the potential requirements of seven households who were not able to be interviewed through the GTAA is three, based on application of a national household formation rate.
- 5.3 A land supply study was commissioned to provide evidence to support the council in assessing the potential supply of land to meet identified Gypsy and Traveller needs in the borough and is separately published – Lambeth Gypsy and Traveller Land Supply Assessment Study, DLP Planning Ltd, July 2016. The study assessed (a) capacity on the existing site and (b) the supply of other land in Lambeth that is suitable, available and deliverable to meet gypsy and traveller need. In relation to the existing site, the study concluded there is no potential to increase the number of pitches within the current site boundary beyond the existing 16. This is because the density of the site is already high at 28.5 pitches/hectare, which is at the upper limit of the usual density range for gypsy and traveller sites of 21-29 pitches/hectare. Of 52 other sites put forward for assessment, the study found none to be both suitable and available.
- 5.4 The Land Supply Study identified two vacant pitches at the existing Lonesome Way site. Further analysis of council voids data (summarised at Appendix 1) shows a degree of churn on the site over past years; new licences have been signed on four of the 16 pitches over the previous three years. Despite the council having actively promoted vacant pitches it has, historically, been difficult finding tenants and some pitches have remained vacant for extended periods (6 months to over 1.5 years).
- 5.5 Re-letting vacancies on the existing Traveller site at Lonesome Way has been identified as the most deliverable approach to meeting current and future Gypsy and Traveller accommodation needs. The analysis of past lettings demonstrates that it is very likely at least one pitch would become available every five years, as required to meet the identified need for three pitches over 15 years.

5.6 The council will continue to protect the pitches on the existing site from change to alternative uses unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations, or are demonstrably no longer needed. Any proposals for new Gypsy and Traveller sites would be assessed against the criteria set out in Local Plan policy.

## **6. Conclusions**

6.1 This summary document brings together the evidence on Gypsy and Traveller accommodation need in Lambeth and has been published alongside the Lambeth SHMA 2017 to inform the Local Plan Review. The evidence summarised in this document addresses the requirements of the PPTS (as updated 2015).

6.2 The evidence finds that six households that do not meet the PPTS definition of a Traveller are likely to be in need of accommodation over the 15 year period to 2031. The needs of these households will form a component of the wider objective assessment of housing need, being addressed at the London level through the London SHMA 2017.

6.3 The total number of additional Gypsy and Traveller pitches required over the period to 2031 is three. It is proposed that this need can be met through re-letting pitches on the existing Lonesome Way site as they become vacant.

**Appendix 1: Lonesome Way Traveller Site voids data, May 2016**

	<b>Current status</b>	<b>Current void/tenancy start date</b>	<b>Previous tenancy 1</b>	<b>Previous tenancy 2</b>	<b>Total days void in last 3 years</b>	<b>Additional comments</b>
<b>1</b>	Occupied	07-Apr-97	Not known		0	
<b>2</b>	Occupied	25-Nov-02	Not known		0	
<b>3</b>	Occupied	08-Jun-09	Not known		0	
<b>4</b>	Occupied	16-Nov-09	Not known		0	
<b>5</b>	Occupied	21-Nov-11	Not known		0	
<b>6</b>	Occupied	09-Dec-13	22-Apr-02 to 17-Feb-13		183	Licence renewal / formalisation.
<b>7</b>	Occupied	29-Sep-14	21-Nov-11 to 28-Sep-14		1	Licensee swapped pitches with another licensee.
<b>8</b>	Occupied	29-Sep-14	21-Nov-11 to 28-Sep-14		1	Licensee swapped pitches with another licensee.
<b>9</b>	Occupied	27-Apr-15	20-Feb-12 to 19-Apr-15		8	New licence
<b>10</b>	Occupied	10-Aug-15	28-Apr-08 to 02-Mar-14		526	New licence
<b>11</b>	Occupied	02-Nov-15	02-Jun-12 to 01-Nov-15		1	Licence renewal / formalisation.
<b>12</b>	Occupied	02-Nov-15	25-May-09 to 09-Feb-14		631	New licence
<b>13</b>	Occupied	07-Mar-16	04-Feb-13 to 06-Mar-16		1	Licensee moved from a different plot.
<b>14</b>	Occupied	21-Mar-16	31-Mar-08 to 06-Mar-16		15	New licence
<b>15</b>	Void	02-Nov-15	31-Aug-15 to 01-Nov-15	None	220	
<b>16</b>	Void	21-Dec-15	10-Aug-15 to 20- Dec-15	23-Aug-10 – 09-Feb-14	599	