

GYPSIES & TRAVELLERS AND TRAVELLING SHOWPEOPLE ACCOMMODATION

EVIDENCE BASE PAPER

Summer 2015



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GYPSIES & TRAVELLERS AND TRAVELLING SHOWPEOPLE ACCOMMODATION EVIDENCE BASE

1. INTRODUCTION

- 1.1. The London Borough of Bromley is developing its Local Plan. This evidence base paper has been prepared, in line with “Gypsy and Traveller Accommodation Needs Assessments Guidance (2007)”, to inform the development of the Local Plan, ensuring it accords with the Government’s “Planning Policy for traveller sites” (2012).

Background

- 1.2. Gypsies and Travellers have traditionally stopped in Bromley whilst working in and travelling through the borough. Historically gypsies moved between farms in Bromley and Kent picking fruit and vegetables in the summer, hops and potatoes in early autumn. As traditional forms of work diminished travelling patterns changed both nationally and locally. More recently Irish travellers have also visited the Borough. The 1960 Caravan Sites and Control of Development Act prohibited caravans from common land. With fewer stopping places much of the Gypsy and Traveller population became settled and placed in social housing stock. St Mary Cray has one of the largest settled housed Gypsy populations in the UK, estimated by the Bromley Gypsy Traveller Project to be in excess of 1,000 families. The 2011 Census returns produce a markedly lower figure of 580 people defining themselves as Gypsy or Irish Traveller.
- 1.3. Of those who retain a nomadic lifestyle the majority are Romany Gypsy families, based chiefly on two Council sites in the Cray Valley. There are also a number of Irish Travellers on temporary sites across the Borough.
- 1.4. There is also a community of Travelling Showpeople in Layhams Road. Show people are a community of self employed business people who travel the country, often with their families, holding fairs. They do not in general share the same culture or traditions as Gypsies and Travellers.
- 1.5. The Map in Appendix 1 and the table in Appendix 2 identify the locations of sites referred to in this document and set out details of the current planning situation and numbers of caravans on the sites.

Legislative and Policy Framework

National

- 1.6. The Council has a responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. The 2004 Housing Act (section 225) requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area, as part of the wider assessment of housing needs, and produce a strategy on how these needs can be met). Additionally local planning authorities have a statutory duty to assess accommodation needs of travellers and for the preparation of Local Plans.

- 1.7. Under the Human Rights Act (1998) case law has established that the Government has a duty to “facilitate the gypsy way of life” for ethnic Gypsies and Travellers. The Equality Act 2010 recognises Gypsies and Irish Travellers as ethnic groups and protects them against discrimination.
- 1.8. Criminal Justice and Public Order Act 1994 and Anti-social Behaviour Act 2003the relating to Gypsies and Travellers.
- 1.9. Other relevant legislation includes the Housing Act 1996 in respect of homelessness and the statutory nuisance provisions of the Environmental Protection Act 1990
- 1.10. In March 2012 the Government published “Planning Policy for Traveller Sites” (PPTS) to be read in conjunction with the National Planning Policy Framework (NPPF). This guidance was updated 31st August 2015.

In paras 3 & 4 the PPTS states that the

“overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

To help achieve this, Government’s aims in respect of traveller sites are:

- *that local planning authorities should make their own assessment of need for the purposes of planning*
- *to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites*
- *to encourage local planning authorities to plan for sites over a reasonable timescale*
- *that plan-making and decision-taking should protect Green Belt from inappropriate development*
- *to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites*
- *that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective*
- *for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies*
- *to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*
- *to reduce tensions between settled and traveller communities in plan-making and planning decisions*
- *to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*
- *for local planning authorities to have due regard to the protection of local amenity and local environment.”*

- 1.11. Policy B advises that

9. Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities

- 1.12. Policy E of the PPTS deals specifically with traveller sites in Green Belt. It reiterates previous Green Belt policy in relation to travellers advising that:

16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.

- 1.13. National policy does however indicate how traveller sites can, in exceptional circumstances, be defined as sites inset within the Green Belt and specifically allocated as traveller sites only.

17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

Regional and Local

- 1.14. The London Plan (2015) advises that Boroughs should identify the accommodation needs of Gypsies and Travellers (including Travelling Show People) address them in line with national policy in coordination with neighbouring boroughs” (Policy 3.8i, para 3.56). Whilst the London Plan does not set specific targets for Boroughs, the needs for traveller sites, indicated in the London wide 2008 Gypsy and Traveller Accommodation Needs Assessment (GTANA) was discussed in detail prior to the adoption of the London Plan and recommendations for targets were made by the Panel at the Examination in Public.
- 1.15. Taylor Review of Government Planning Practice guidance recommends the existing guidance “Gypsy and Traveller Accommodation Needs Assessments Guidance (2007)” be kept until it is replaced by revised guidance.
- 1.16. The Bromley UDP (2006) Policy H6 sets criteria for the use of land by Gypsies and Travellers but does not set a target for provision. Since the UDP Policy

was adopted in July 2006 a range of temporary and permanent permissions have been granted.

Bromley UDP

- 1.17. UDP Policy H6 ensures the continuing provision of existing sites at Star Lane and Old Maidstone Road for Gypsies and Travellers and at Keston Showmans Yard and King Henrys Drive for Travelling Show People. It sets criteria against which proposal for new sites will be considered,
- (i) the proposal would meet an identified need for gypsies residing within the Borough or for travelling show people who have traditionally occupied sites locally;
 - (ii) the site is situated outside any areas of constraint;
 - (iii) the site is well-related to schools, shops, medical facilities and public transport; and
 - (iv) there would be no adverse effects on the amenities of surrounding development.

Emerging Bromley Local Plan

- 1.18. The Bromley Local Plan is currently being developed. The “Core Strategy Issues Document” was published in 2011, outlining some of the issues related to Gypsies and Travellers. The Bromley Gypsy Traveller Project, who provide advice, support and information for Travellers in Bromley, responded to the document
- 1.19. Preferred Options were developed in light of responses to that consultation and local evidence and were published for consultation in the “Options and Preferred Strategy Document” (2013). The document proposed that pitches, sufficient to meet the current and projected need could be provided by allowing the expansion of existing sites or allocation of new sites (on Green Belt if no other land is available and therefore exceptional circumstances could be demonstrated).
- 1.20. The “Local Plan Draft Policies and Designations” document (2014) set out draft Policy 5.12 Traveller’s Accommodation which states:

The Council will monitor and seek to address the accommodation needs of Travellers, including pitches for Gypsies and Travellers, and plots for Travelling Show-people, in partnership with representative groups and the wider sub region.

The Council will seek to meet the identified need for provision by first considering the potential within allocated Traveller sites. Proposals for new development within allocated traveller sites will need to be sensitively located and landscaped to minimise adverse impacts on the amenity of the site and adjoining land.

Proposals for new Traveller sites to address an identified need for provision will be acceptable provided that:

- i the site lies outside any areas of constraint, complying with Green Belt and other open space policies, and*
- ii. the site is well- related to schools, medical facilities, shops and public transport, and*
- iii. there are no adverse effects on the residential amenity of neighbouring properties and the local environment, and*
- iv. there are no adverse impacts on the health and wellbeing of Travellers related to local environmental quality (such as noise and air quality). Sites in areas at high risk of flooding, including functional flood plains, will generally be resisted given the particular vulnerability of caravans.*

With regard to the need for transit pitches the Council will work with the sub-region to secure their provision in an appropriate location within the sub-region.

Land allocated as Traveller Sites will be safeguarded for this purpose only.

- 1.21. The “Draft Allocations, Further Policies and Designations Document” (2015) made minor amendments to the policy (underlined) and identified existing sites within the Green Belt for release as an “allocation only for a Traveller Site”

Current Provision

- 1.22. There are currently 47 pitches with permission in Bromley (LA and private pitches):

- 36 pitches on two Council owned sites in the Cray Valley.
- 11 private authorised pitches on 4 separate sites

All of the Local Authority pitches are currently occupied.

- 1.23. During the over the last 15 years Star Lane and more recently the old Maidstone Road site have been renovated, bringing permitted but under-occupied pitches back into use. However, over the past 20 years only 2 new local authority pitches have been permitted (although a further 3 were granted permission but never developed).

Year	Site and planning reference	Number of Local Authority pitches
Pre1980	Star Lane	20
1988	Star Lane (88/02236)	2
1988	Old Maidstone Road (88/04679	12
2006	Old Maidstone Road 06/00271	2
Total Current Local Authority Pitches		36

2. NEED IN BROMLEY & LONDON

- 2.1. The Government guidance “Planning policy for traveller sites” (2015) advises in Policy A (para 7).

“In assembling the evidence base necessary to support their planning approach, local planning authorities should:

- pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups)*
- co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities*
- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*

Past Assessments and Targets

- 2.2. This evidence base paper sets out the findings of previous needs assessments.
- 2.3. Bromley individually, and in conjunction with other London Boroughs, has commissioned several studies of Gypsy and Traveller sites in the past:-

GL Hearn sites study (2003) noted that there were 34 caravans on authorised sites and considered that there was an unmet need for 21 pitches.

WS Planning (2005) – assessment of accommodation needs (2005) pointed to a need for around 25 permanent pitches and 10 transit pitches.

London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2008 produced a minimum and maximum need figure for pitches between 2007 – 2017. The minimum need for Bromley over that period was determined as 29 pitches. The GTANA also applied a calculation to estimate demand from Gypsies and Travellers living in brick and mortar accommodation, who had a psychological aversion to bricks and mortar. This calculation produced a theoretical demand for a further 79 pitches to give a maximum figure of 119 pitches.

Whilst the Council does not accept the maximum figure and this has never been pursued through the development of the London Plan the assessment does establish a number of points relating to:

- average Gypsy and Traveller family size (3.4 persons)
- a percentage need for transit sites (3.5% of the residential pitch need then doubled to allow for uneven annual usage)

- acknowledgement of the high level of satisfaction with accommodation amongst settled traveller families in Bromley.

Draft Replacement London Plan Examination in Public Report of the Panel (2010) recommended in para 3.145 targets up to 2017, for the South East grouping (Southwark, Lewisham, Bexley, Greenwich and Bromley) with the range of 65-75 pitches.

- The lower South East distribution figure of 65 of which Bromley's borough component was a minimum of 19. The minimum figure reflecting the historically high levels of provision in Bromley:
"the high levels of past provision made or accepted in South East and North East London in the past, in particular LB Bromley and LB Havering, has the effect of inflating apparent need in those areas, so that the second column (65 pitches) indicates lower provision in these latter sub regions"(para 3.140)
- The higher end of the South East grouping range sought 75 pitches, of which Bromley's component was 29 pitches.

Despite the EIP panel recommendations the London Plan (2012) did not include pitch targets, giving local authorities the responsibility to determine the right level of site provision, reflecting local need and historic demand and to bringing forward land in their plans. This approach has been maintained in the recently adopted London Plan 2015

Summary of Study Findings and Requirements over time

Name of Study	Year	Pitch need to 2017
<i>GL Hearn Gypsy Sites Study</i>	2003	21
<i>WS Planning</i>	2005	25 (+ 10 transit)
<i>Gypsy and Traveller Needs Assessment</i>	2008	29 (up to 119)
<i>Report of the EIP Panel London Plan</i>	2010	19 or 29

2.4. It is important to note that subsequent to the assessments listed below 9 additional pitches now benefit from permanent permission (Permissions/ appeals or certificate of lawfulness), namely:

- 2.5.
- 3 additional pitches at 148 Croydon Road, Keston
 - 3 pitches at "Meadowview" Saltbox Hill, Biggin Hill
 - 2 pitches at "Southview", Trunks Alley, Hockenden Lane
 - A single pitch at "Archies Stables", Cudham Lane North

Health Needs Assessment (2008)

2.6. In 2008 a health needs assessment was undertaken, looking at the Gypsy & Traveller Community in the Cray Valley. The assessment, which reflected that "Gypsies and Travellers are the most excluded ethnic minority in the country" (DoH 2004), made the following observations:

- Key features of Gypsy and Traveller culture, highlighted within the health needs assessment and other evidence, may affect their accommodation needs and their ability to access to provision.
- There is a cultural tendency to start a family at a young age increasing pressure for additional living space and leading to girls leaving school early without formal qualifications.
- Culturally there is a strong onus placed upon self sufficiency; boys are encouraged to leave school early and work in the family business again resulting in leaving school early without formal qualifications and with poorer literacy skills.
- The 2008 Health Needs Assessment indicated that advice regarding housing matters was usually sought by Gypsies and Travellers from the Bromley Gypsy Traveller Project (BGTP).

Travelling Showmen's Ground (Yard)

- 2.7. The Travelling Showman's Ground (Yard) Keston, increased in size from 23 plots (occupied by 16 extended families) to 29 plots (10/00281). As part of that application the Travelling Showman's Guild confirmed that this increase would meet the accommodation needs of Bromley based Travelling Showmen until 2017, and the earlier stages of the plan were developed in light of this assurance. However, responses to the "Options and Preferred Strategy" (May 2013) indicated a requirement for two further plots. This need has been confirmed through the recent temporary permission, granted on appeal, for 2 additional plots on land adjacent to the existing showmans yard.

Consultation with Traveller Groups

- 2.8. In addition to the general Local Plan consultation process Traveller representative bodies have been consulted on the emerging Local Plan throughout its development from the publication of The Core Strategy Issues Document (2011), including the "Options and Preferred Strategy" (2013) and the "Draft Policies and Designations" document (2014). Their responses are outlined below.

The Bromley Gypsy Traveller Project (BGTP)

- 2.9. BGTP provide advice, support and information for Travellers in Bromley, they suggest that the best way to protect the environment would be to prevent unauthorised incursions by ensuring sufficient pitches by allowing the expansion of existing sites or allocation of new sites (on Green Belt if no other land is available). Their response raises the following points:
- Gypsies & Travellers living in Bromley should not be forced onto the road or into bricks and mortar housing.
 - Temporary pitches should become permanent
 - Layhams Road. These travellers are established in the area with
 - Future need on pitches
 - The two authorised sites at Old Maidstone Rd and Star Lane are well occupied. Over the period of the plan there will be pressure for additional pitches from within the existing Gypsy & Traveller community as the children grow and have their own families.

- The Council should investigate needs from Gypsies & Travellers who now live in houses, but who have a psychological aversion to bricks and mortar.
- In addressing areas of multiple deprivation (e.g. the Cray Valley) the Council should take account of the particular needs of the settled Gypsy & Traveller community.

Friends, Families & Travellers (FFT)

- 2.10. FFT, a national charity that works on behalf of all Gypsies and Travellers, comment that Bromley should adhere to the assessment produced by the GTAA of need, including Travellers who are inappropriately housed, and the specific Borough target be met and delivered in a reasonable time frame.

They note that given the high cost of land in London it is likely that the large majority of pitches will need to be treated as affordable and suitable means of delivery of pitches on the ground developed.

They suggest a trajectory for delivery to at least 2017 and a criteria based policy which will help guide allocations and to meet unexpected demand.

They also highlight that whilst organisations such as FFT and Traveller Law Reform Project (TLRP) can comment on planning policy this is no substitute for consultation with local Gypsies and Travellers.

London Gypsy Traveller Unit (LGTU)

- 2.11. The LGTU do not consider that the expansion of existing sites and allocation of existing sites without permanent permission sufficient to meet the requirements of national guidance (the PPTS).

- They stress the need to work collaboratively with the Gypsy and Traveller community and support organisations in understanding their accommodation needs and identifying sites (PPTS requirement) and consider the evidence to justify the Council's preferred approach is insufficient.
- They consider that the Gypsy and Traveller and Travelling Showpeople Evidence Base Paper does not meet the PPTS requirements, as it is based solely on desktop research and a set of assumptions about the population growth within the existing community. They consider this approach is unsound due to a lack of detailed interviews with a relevant sample of the Travelling community living on sites and in bricks and mortar housing. They recommend that the 2008 London Gypsy and Traveller Accommodation Needs Assessment higher figure of 119 new pitches required by 2017 is used as the baseline figure to inform the strategic policies set out in the Bromley Local Plan.
- They challenge the assumption that Gypsy and Traveller site allocations can only be made within the Green Belt, which it argues stems from a narrow interpretation of the PPTS requirement to promote peaceful and integrated co-existence between sites and the settled community and does not reflect a fair and equal treatment for Gypsies and Travellers, and limits the possibilities of accommodating the full extent of need. They

recommend the provision of Gypsy and Traveller pitches as part of mixed-use developments, as a component of the residential use.

- They are not satisfied that the approach to provide a transit site sub-regionally meets the requirements of the Duty to Cooperate, as defined in the NPPF (paragraphs 178-181) and PPTS (paragraphs 6 and 9).
- They are concerned that the wording of draft Policy 5.12 is inappropriate and does not set a target for pitches and argues that the same approach must be taken with Gypsy and Traveller pitch targets as with conventional housing in order to secure a fair and inclusive strategy.

Local Plan Development

- 2.12. Throughout the Local Plan process there has been engagement with Traveller families and Travelling Showmen (detailed in Appendix 3)
- 2.13. The Core Strategy Issues Document was published in 2011. In light of responses to that consultation and local evidence the Council developed and published options in the “Options and Preferred Strategy Document” (2013). The preferred options were developed into policies, and consulted on in Feb 2014 in the “Local Plan Draft Policies and Designations” document.
- 2.14. The proposed traveller sites, referenced in the previous two consultations are delineated in the current consultation “Draft Allocations, further policies and designations document” (Sept 2015).

Neighbouring Boroughs

- 2.15. Local authorities are in the process of updating their needs assessment and the information below is subject to change. South East London Councils Gypsy & Traveller Partnership Group (Lewisham, Greenwich, Southwark, Bexley, Lambeth and Bromley) met in response to the Duty to Co-operate. Several Boroughs with a view to commissioning needs assessments. Bromley considers this document (and the preceding assessment documents published to support the emerging Local Plan) to be sufficiently robust and does not therefore intend to commission the consultants. However, it is appropriate to consider provision for Travelling Showmens plots and transit site provision through the sub regional group. This would be in line with the recommendations of the Panel Report into the London Plan Examination in Public (EiP) and is indicated as the preferred option in Bromley’s Strategy and Preferred Options document.
- 2.16. Lambeth published its “Gypsy and Traveller and Travelling Showpeople Accommodation Assessment” in 2014, which noted the requirement for 8 pitches over the next 17 years but indicated its requirement over the next 5 years (2 pitches) could be addressed through better site management. At that time Lambeth provided 15 pitches on a single public site and capacity is currently being increased through improvement works to provide an additional pitch. The remaining need will be taken forward through a separate “Gypsy and Traveller Development Plan Document”. There is no existing or proposed provision for Travelling Showpeople.

- 2.17. Croydon currently has 19 permanent pitches on a single site. The Croydon "Gypsy and Traveller Accommodation Needs Assessment" was published November 2013 suggested a need for 49 additional residential pitches and 1 emergency stopping place. There is no existing or proposed provision for Travelling Showpeople.
- 2.18. Lewisham will soon be consulting on a new Local Plan, but intend to prepare a separate Local Plan specifically for the allocation of a site or sites for Gypsy and Traveller accommodation, Alongside preparation of an integrated Local Plan for Lewisham
- 2.19. Southwark currently have 42 Gypsy and Traveller pitches on 4 public sites. Southwark will be consulting on a separate Gypsy and Traveller DPD
- 2.20. Greenwich has a single 40 pitch private site and is currently preparing a Gypsy and Traveller Accommodation Needs Assessment.
- 2.21. Bexley published a needs assessment in 2009. This assessment sets out the existing 22 pitches (on 2 sites) and 6 pitches on a single private site. The assessment did not identify any requirement for additional pitches over the following 5 years.
- 2.22. Sevenoaks District Council has some 88 pitches and a requirement for 72 pitches to 2026, identified through 2012 GTAA undertaken by Salford University. It suggested no identified need for Travelling Show People. The first stage of consultation on their Gypsy and Traveller Plan closed in July 2014. It sought views on potential site options across the District and asked landowners to suggest sites for additional pitches. The Council consulted on additional sites between 27 November 2014 and 22 January 2015.
- 2.23. The Dartford "Gypsy, Traveller and Travelling Showpeople Accommodation Assessment" was published October 2013 and indicated 62 pitches, comprising 16 public, 37 private and 9 immune from enforcement. The Assessment indicated a need for 34 pitches up to 2028, of which 13 were needed within 5 years (up to 2018). Planning permission has been granted for a 16 pitch site to meet that identified 5 year requirement.
- 2.24. Tandridge Traveller Accommodation Assessment – was published October 2013 and indicated 62 pitches, comprising 18 public, 25 private and 1 tolerated Gypsy and Traveller pitches, and a private Travelling Showmens site containing 48 plots. The assessment indicated a need for 63 pitches up to 2028, of which 48 were needed within 5 years (up to 2018). It also indicated a need for 26 Travelling Showmens plots up to 2028, of which 18 were needed within 5 years (up to 2018).

Demand for Additional Pitches / Plots

- 2.25. There is an outstanding demand from sites across the Borough which do not have permanent permission. The sites have been reflected in the Department of Communities & Local Government Caravan Count over a number of years.

Pitches with Historic Temporary Permission.

- 2.26. 5 sites within the borough have had historic temporary permissions providing 11 pitches in total
- 10 pitches on 4 adjacent sites in Layham's Rd, close to the Croydon borders, occupied by Irish Travellers These sites will have been occupied by the Gypsies and Travellers for over 10 years
 - A single pitch site in Hockenden Lane, Cray Valley where a new application is currently awaiting determination.

Local Authority Sites and Waiting List Data

- 2.27. The majority of Star Lane Pitches could, if required, accommodate a static caravans (or a double unit) and at least 1 touring caravan and the majority of pitches Old Maidstone Road could, if required, accommodate 1 static caravan and at least 1 touring caravan.

- 2.28. The turnover of plots on the local authority sites is in the order or a couple of plots per year, other than in exceptional circumstances such as the refurbishment and addition of 2 new plots at Old Maidstone Rd in 2009:

- To join the waiting list for Council Sites the applicants need to be:
- At least 16 years old
- A Gypsy or Traveller, either by ethnic group or under the current legal definition
- Not "intentionally homeless" under the Housing Act 1996

There are also exclusions relating to convictions, anti-social behaviour and current or historic housing problems.

- 2.29. Joining the waiting list is indicative of the desire for a pitch rather than evidence of need. The allocation of pitches which become available is determined on the basis of the criteria below which prioritise the need of waiting list applicants.

- 2.30. As at June 2015 there was a single outstanding application for a pitch for an individual with no dependents.

- 2.31. The criteria used to allocate a pitch to people on the waiting list include:

- Urgent housing need including homelessness (or the threat of homelessness) and (not intentionally homeless)
- Living in overcrowded circumstances (although there are no set standards for "overcrowding")
- a victim of violence or harassment
- Vulnerability - Currently receiving or assessed as needing support (by social services or education authority)

Other factors might include immediate family links or children regularly attending school within the Borough or regular employment or proven travelling history with the Borough.

- 2.32. Overcrowding of a pitch/plot by one large household with insufficient space on the pitch/plot for a further caravan can be assessed by 'bedroom standard' criterion – one bedroom
- to each couple or lone parent,
 - to each pair of children under 10,
 - to each pair of children of the same sex over 10,
 - for individual children over 10 of different sex and for adults.
(Estimating Housing Need' CLG 2010)
- 2.33. Adults are classified by UK law as being 18 and above, however, there is no statutory law which states when a young person can leave home and it is acknowledged that many Gypsies, Travellers and Travelling Showpeople will leave home before this age, yet there will also be those that remain at home on the family site for longer. "Concealed households" consist of those aged 18 or over still living at home but wanting to form a separate household
- 2.34. Overcrowding of caravan/mobile homes, where family numbers have grown to the extent that there is insufficient space for the family within its caravan accommodation (rather than size of pitch/plot) is a matter for the travellers to consider as they own and are responsible for the size of their caravan/mobile homes

Psychological Aversion

- 2.35. Gypsy and Traveller Accommodation Needs Assessments – Guidance (2007) advises that need can also result from Gypsies and Travellers for whom bricks and mortar accommodation is unsuitable "by virtue of **proven** psychological aversion to bricks and mortar accommodation" (Para 15).
- 2.36. GTANA interviews do indicate high level of satisfaction amongst settled traveller families in Bromley suggesting in GTANA para 12.28 that this may be due to the fact that the very large settled population lives in a relatively small area in close proximity to other Gypsies & Travellers, meaning that the isolation that living in housing can entail is mitigated.
- 2.37. Bromley rejects the figures from the GTANA 2008 which is based on a theoretical calculation rather than local evidence of proven psychological aversion to bricks and mortar. Additionally the waiting list applications do not substantiate the significant level of demand indicated in the GTANA, nor is a waiting list application alone necessarily proof of psychological aversion.

Travelling Showmen

- 2.38. The waiting list for Gypsy pitches can indicate where there may be overcrowding of pitches. However, there is no equivalent Council waiting list for Travelling Showmen for the Keston site which is privately owned. Recent engagement with Travelling Showmen and the Guild indicate doubling up on at least one plot in the Keston Showman's Yard.

Total Current Need

- 2.39. There is a need for 11 pitches to cater for long established families currently in situ but without permanent planning permissions for their sites. The single waiting list application may be addressed by natural turnover, however this could be seen to constitute “need” for an additional pitch
- 11 temporary pitch permissions (5 sites)
 - Possible need for 1 pitch from the waiting list
- 2.40. In earlier Local Plan consultations The Travelling Showmens Guild suggested a longstanding previously unrecognised need for two plots, resulting in a temporary planning permission recently granted on appeal
- 2.41. The total current need for Travellers is therefore assessed as a minimum of 11 pitches, addressing the need accepted for long established families on sites without the benefit of permanent planning and 2 plots for Travelling Showpeople. To ensure a robust assessment of need the waiting list need should be considered, possibly producing a need for a further pitch. Thus the current need for Gypsy and Traveller pitches is 11 or 12 pitches and 2 plots for Travelling Showpeople.

Future Accommodation Needs of Travellers

5 Year Supply

- 2.42. PPTS Policy H highlights the need for planning authorities to demonstrate an up-to-date five year supply.

Gypsies and Travellers

- 2.43. Preparing Regional Spatial Strategy reviews on Gypsies and travellers by regional planning bodies (2007) - referred to in the draft replacement London Plan para 3.15). Suggests that Gypsy and Traveller household growth is expected to be 3% a year. This figure are based on research by Pat Niner (Local Authority Gypsy/Traveller Sites in England, 2003 ODPM) who suggests household growth rates of 2% and 3% a year.
- 2.44. Whilst the 3% household growth figure has been applied to determine future need it is recognised that a lower household growth is usual over the longer term. Further investigation into household formation on Bromley sites would assist in producing a more locally responsive assessment of pitch need and the ability of existing sites to meet the supply requirements for the period beyond 2020 to the end of the plan period.
- 2.45. Applying the 3% Gypsies and Travellers calculation to current provision (47 pitches) and current need (11-12 pitches) would lead to a requirement for an additional 9 to 10 pitches by 2020.

Current situation Existing pitches (47) plus need (11-12)	5yr pitch supply 2016 to 2020 @ 3%	pitch supply 2021 to 2025 @ 3%	pitch supply 2026 to 2030 @ 3%
58 – 59	9 – 10	11	13

Beyond 2020 to 2030

- 2.46. Family growth of Gypsies and Travellers at 3% per year would suggest an additional need between 2020 and 2030 for 24 pitches.

Travelling Showpeople

- 2.47. The CLG guidance indicates that the need arising from travelling showpeople is expected to increase at 1.5% a year. Applying the 1.5% a year to the 29 existing plots and the need for 2 additional plots i.e. to 31 plots produces a requirement for 2 plots to 2020.
- 2.48. Considering Travelling Showpeople on the basis of 1.5% household growth per year from 2020 – 2030 on the basis of 31 plots produces a requirement for a further 6 plots.

Intensification of Sites

- 2.49. “Designing Gypsy and Traveller Sites – Good Practice Guide” (DCLG 2008) gives advice about the size of pitches. It advises that “there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs (para 7.9).
- 2.50. Nevertheless, as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area. (Good Practice Guide para 7.12) This is generally accepted as being approximately 500sqm.
- 2.51. The guidance does allow for pitches of more limited scale, noting in para 7.13 that:

“Smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle)

3. ENFORCEMENT

- 3.1. In addition to establishing the appropriate level of pitch provision the guidance also requires Local Plans to address effective enforcement of planning policy.
- 3.2. Speeding up the enforcement process helps to keep costs down. Enforcement action will be quicker and more effective, and a wider range of powers can be

used, where appropriate authorised provision is made for Gypsies and Travellers within the area. ("Guide to effective use of enforcement powers" ODPM 2006).

3.3. Unauthorised siting tends to fall into two main categories.

- Unauthorised developments where the land is within the ownership of the Gypsies and Travellers, where the intention is to settle with static mobile homes as a permanent family base from which to travel. These developments tend to be dealt with by the Planning Department either through the consideration of a planning application or enforcement action.
- Unauthorised encampments where the Gypsies and Travellers arrive on land, not within their ownership, as part of their travelling lifestyle, usually during the summer months. The length of stay being dependent upon the speed and ability of the authorities to move them on. These incursions tend to take place in open public spaces (e.g. park land or car parks).

Unauthorised Developments

3.4. The Localism Act prevents the process being drawn out:-

- the Council can refuse to determine an application for which there is a pre-existing enforcement notice (issued before the application was received)
- where an enforcement notice is served during the period for determining a retrospective application appeals cannot be lodged on the grounds that planning permission should have been granted (although it can be pursued under other statutory grounds)
- the Council may apply to a Magistrates Court for a Planning Enforcement Order (PEO) within 6 months of a breach of planning control coming to its knowledge. If granted the Council then has a year to commence enforcement action.

Costs associated with Unauthorised Developments

3.5. Gypsy & Traveller appeals have not historically been dealt with as written reps.

3.6. The costs for hearings and inquiries range upwards from £4,000 – 5,000 to in excess of £10,000. Those costs significantly increase with evictions (such as those at Walden's Farm, Bromley) and considerable delays can occur a legal challenge to the eviction is mounted. The extreme example of Dale Farm indicates how costs can escalate for evictions from long established sites. Basildon Council and the police jointly spent over £7 million on the evictions from the unauthorised area of Dale Farm.

3.7. Evictions tend not to be a one off cost if there is no alternative provision. Following the evictions from the unauthorised part of Dale Farm, estimates suggested about 50 caravans were parked illegally in the area, both on the

roadside and crowded onto the legal part of the site. Basildon Council has recently granted permission for a new site of 15 double plots nearby.

Unauthorised Encampments

- 3.8. In 2014 there were 21 unauthorised encampments. In at least 5 instances these incursions involved the same family group moving from one site to another. (Appendix 4).
- 3.9. The “Guide to effective use of enforcement powers” (ODPM 2006) advises that before taking action, landowners should consider whether enforcement is absolutely necessary. It may be that in certain circumstances, alternatives to eviction action are appropriate, for example:
- If in an unobtrusive location it may be preferable to agree a departure date with the travellers;
 - If the local authority has identified a location in the vicinity which would be much less damaging or obtrusive, unauthorised campers could be encouraged to move to this location. (e.g. transit site) This may not be limited to official residential and transit sites; it might also include particular locations which have been identified in the district where Gypsies and Travellers can stop for limited and agreed short periods of time, without having any adverse impact on the settled community.
- 3.10. Under Equalities and Human Rights legislation Local Authorities have responsibilities to consider detailed welfare issues prior to serving notices in response to unauthorised encampments. Efforts should be made to keep members of the encampment together; where this is not possible; dependant members of the encampment should not be separated.
- 3.11. Bromley has taken a robust response to encampments. On average and having undertaken all necessary checks as per guidelines it takes approximately 3-4 days before the travellers are moved on.
- 3.12. The Criminal Justice and Public Order Act 1994 Section 61 gives the Police the power to remove trespassers with 6 or more vehicles (or fewer where there is damage to land or property of threatening or abusive behaviour) if reasonable steps have been taken by or on behalf of the landowners to ask them to leave. An offence is committed if the trespassers do not leave immediately or return to the site within 3 months. If this occurs the Police can seize and remove vehicles under Section 62. Similar powers against unauthorised occupiers are given to local authorities under Section 77.
- 3.13. There are also unauthorised encampments on private land. Private landowners do not have the same responsibility as the police and local authorities to consider the welfare issues. They can regain possession of his/her land using no more force than is “reasonably necessary” to evict him or her (under Common Law Powers and Part 55 of Civil Procedure Rules) Private bailiffs may be used to carry out the eviction. Use of excessive force could give rise to a claim against the landowner by the trespassers. Where the landowner is a local

authority or other public body, the necessary welfare assessments should be carried out before any eviction is carried out.

- 3.14. The Anti-Social Behaviour Act 2003 introduced stronger police powers to move unauthorised encampments where at 1 or more vehicles where there is a suitable pitch or pitches on a relevant caravan site. The Secretary of State regards a suitable pitch as one within the local authority area, (including an authorised transit site or stopping place) that provides basic amenities, including water, toilet and waste disposal facilities, available (i.e. no waiting list) for peaceful occupation for at least three months ("Guidance on Managing Unauthorised Camping" ODPM Feb 2004).
- 3.15. Guidance recommends development of a co-ordinated strategy by all involved authorities (primarily local authorities and police) and advises that the courts may consider the approaches they devise and implement as material considerations in eviction or other enforcement decisions."

Costs associated with Unauthorised Encampments

- 3.16. There are a range of costs associated with the enforcement process, both financial (staffing and legal costs) and in terms of community cohesion. On average it takes one and half days of staff time to undertake all the appropriate checks, liaise with Legal and the police and carry out the required paper work. Whilst the encampments are in place and until necessary clean up works are undertaken the usability of the parks by local residents is adversely affected. There are social costs in terms of community cohesion / confrontation with the local settled community and the actual confrontation with Council officials.
- 3.17. The Guide to Effective Use of Enforcement Powers (ODPM 2006) suggests that site protection measures could also be considered in locations which are particularly vulnerable to unauthorised camping, for instance by creating earth bunds, or embankments, around the site, or by introducing height restrictions to entrances. However in addition to the environmental costs of such physical barriers which are visually unattractive the financial costs of defensive barriers at potential locations would be significant. The costs of physical works vary from under £3,000 to up to £20,000 or more where there are a number of entrances (e.g. Norman Park). The costs of such physical barriers across the Borough would be significant; the Borough's parks alone having some 20 or 30 car parks. Additionally there would be ongoing maintenance costs, as existing barriers have been subject to vandalism requiring repair.
- 3.18. There are also costs to other organisations involved in assisting and advising Gypsy Travellers in Bromley on housing matters.

Transit pitches

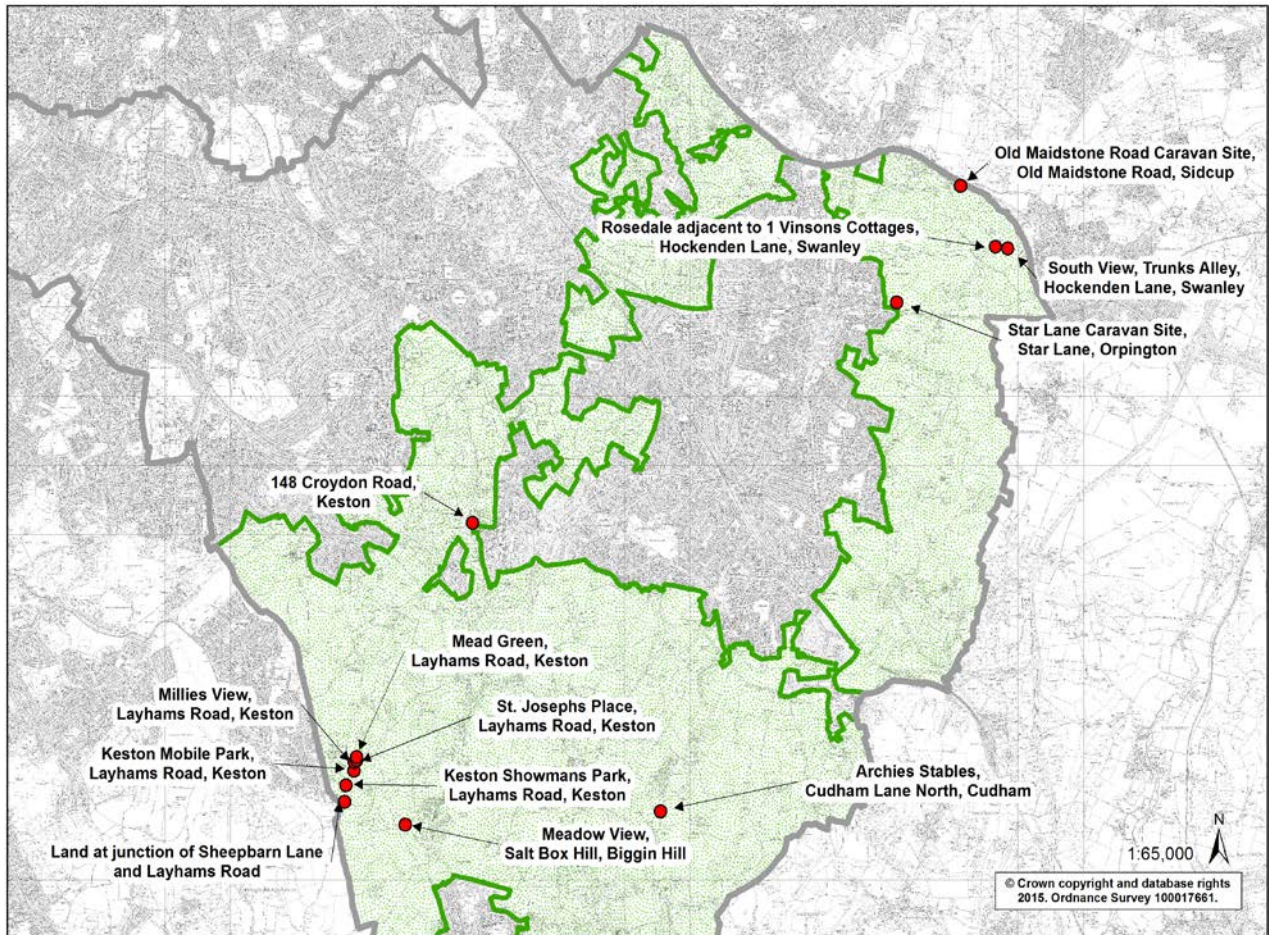
- 3.19. The numbers of unauthorised encampments is indicative of the need for transit site provision to enable speedy enforcement against encampments in inappropriate locations and to minimise the costs associated with the enforcement process and preventative site protection measures.

- 3.20. The Panel report into the Draft London Plan (para 3.142) suggested that 20 transit pitches be provided across London with a broadly equal distribution made through the sub-regional housing partnerships. Whilst this requirement was not incorporated into the London Plan 2011 the Governments “Planning Policy for traveller sites” (2011) requires local authorities to set pitch targets for gypsies and travellers which address the likely transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 3.21. The issue of transit site provision will be considered sub regionally, in line with draft Local Plan Policy 5.12 as set out in the “Draft Policies and Designations Consultation (2014)

4. CONCLUSIONS

- 4.1. The total current need for additional Traveller provision is assessed as 11 – 12 pitches and 2 plots which would address the needs of existing families on sites without the benefit of permanent planning permission and the single application on the waiting list
- 4.2. The five year supply for Gypsies and Travellers (on the basis of a 3% annual growth figure) suggests a requirement for an additional 9 to 10 pitches by 2020. It is generally recognised that a lower household growth is usual over the longer term and therefore the figures of 11 pitches (2021 – 25) and 13 pitches (2016 – 2030) are less reliable and may be an overestimation.
- 4.3. The five year supply for Travelling Showpeople (on the basis of a 1.5% annual growth figure) suggests a requirement for an additional 2 plots by 2020. Using this 1.5% growth figure also suggests the need for a further 6 plots up to 2030.
- 4.4. “Designing Gypsy and Traveller Sites – Good Practice Guide” (DCLG 2008) gives advice about the size of pitches. It advises that “there is no one-size-fits-all measurement of a pitch. This is generally accepted as being approximately 500sqm although smaller pitches may be acceptable provided they can accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle.

Map illustrating the locations of sites referred to in this document



Details of the current planning situation and numbers of caravans on the sites.

SITE DETAILS				Caravans Observed July 2015 Caravan Count	
<u>GYPSY AND TRAVELLER SITES OPERATING WITH PERMANENT PERMISSION</u>	Status	Number of Pitches	Current Planning Position	Observations & Comment	Total Caravans
Star Lane	LA Authorised	22 (no vacancies)	Permanent	22 static 20 tourers	42
Old Maidstone Road	LA Authorised	14 (no vacancies)	Permanent	13 static 12 tourers	25
Land at 148 Croydon Road, Keston	Private Authorised	5	Permanent	3 Static 7 tourers	10
"Meadow View" Land Adjacent to Gas Holder Station, Salt Box Hill, Biggin Hill	Private Authorised	3	Certificate of Lawfulness	5 Static 4 Tourers 1 Motorhome	10
Archies Stables Cudham Lane North	Private Authorised	1	Permanent	1 Static 1 Tourer	2
Southview, Trunks Alley, Land South of Hockenden Lane, Swanley	Private Authorised	2	Permanent	2 statics 1 Tourer	3
<u>TOTAL</u>		47			92
<u>GYPSY AND TRAVELLER SITES OPERATING WITHOUT PERMISSION</u>	Status	Number of Pitches	Last Permitted Use		
Keston Mobile Park (formerly Delaney & Cash), Layhams Road, Keston	Private Unauthorised	4 (max 8 caravans- only 4 static)	Temporary Expired 2014	4 Statics 9 Tourers 4 motorhomes	17
Mead Green, Layhams Road, Keston	Private Unauthorised	2 (max 4 caravans- only 2 static)	Temporary Expired 2014	4 statics 6 Tourers 4 Motorhomes	14
Millies / Millers View, Layhams Road, Keston	Private Unauthorised	2 (max 4 caravans- only 2 static)	Temporary Expired 2014	2 Statics 2 tourers	4
St Joseph's Place, (Dixons Holdings)	Private Unauthorised	2 (max 4 caravans- only 2 static)	Temporary Expired	2 statics 2 Tourers	5

Layhams Road, Keston		only 2 static)	2014	1 Motorhome	
Land Adjacent 1 Vinsons Cottages, Hockenden Lane, Swanley	Private Unauthorised	1	Temporary Expired 2015	1 Static 1 Tourer	2
<u>TOTAL</u>					

<u>TRAVELLING SHOWPEOPLE</u>	Status	Number of Plots	Current Planning Position	Total Caravans
Travelling Showpersons Ground, Layhams Road	Private Authorised	29	Permanent permission	100
Land adjacent Sheepbarn Lane / Showmans Site	Private Authorised	2	Temporary permission	5

Contacts with the Traveller Community, Site Owners, Neighbours and Partners

Date	Sites	Contacts	Nature of Contact
2009 - 2010		Traveller groups and the GLA	London Plan Development & Examination in Public
15 th May 2009	Keston Travelling Showmans Ground	Chairman of the Guild (at the time) & legal representative	Meeting to discuss site expansion
15 th Sept 2011	Council sites & settled community in St Mary Cray	Gypsy Traveller Project Workers (2) and Traveller rep	Visit to the Gypsy Traveller Project to explain the Plan process & seek response to the Core Strategy Issues Document (CSID)
2011	Various	Gypsy Traveller Project	Written responses to the CSID
		Friends, Families & Travellers (FFT)	
19th Jan 2012	Star Lane	Travellers on site	Visit & meet some residents with Simon Avis discussing site issues
	Old Maidstone Road	Travellers on site	
	Saltbox Hill	Traveller family & support worker	Met with LA site manager Discussed long term history, need for gates to secure children
	Chalkpit site	Family member	Chance meeting (confirmed the site was unoccupied)
	All other unauthorised sites		Site visits with LA site manager
7 th Feb 2012		John Wilson (Police Traveller Liaison)	Meeting to discuss Local Plan
2012 (various)	148 Croydon Rd,	Traveller family and Planning advisor	Planning Appeal – discussion appellant regarding personal need and the wider Borough need inc. site visits
	Star Lane	Traveller planning advisor	
	Old Maidstone Road	Traveller planning advisor	
20 th Dec 2012	Chalkpit	Owner	Met to explain Options for Chalkpit site
2012 / 2013	Archies Stables, (Charmaine Moore)		Case in the High Court & Court of Appeal
Nov 2012 Jan 2013	Adj Keston Travelling Showmans Ground	Travelling Showman	Discussion of site (refused & dismissed) and his families needs Added to database
16 th Jan 2013	Mead View	Traveller	Telephone discussion about future proposals – Options Consultation

			outlined
17 th Jan 2013	All sites put forward in the Options Paper (not Archies Stables)	Traveller families	Letters advising re Options Consultation proposing designating insets within the Green Belt as Traveller sites only
21 st Jan 2013	Saltbox Hill	Traveller	Telephone discussion about the Options Consultation
22 nd Jan 2013	Sites & need in SE London	SE London Councils Gypsy & Traveller Partnership Group Lewisham, Greenwich, Southwark, Bexley, Lambeth	Initial meeting
23 rd Jan 2013	Keston Mobile Park (formerly Delaney & Cash Holdings)	Traveller	Meeting outlining the Options Consultation
24 th Jan 2013	Mead Green Millies View St Josephs Place	Travellers	Meeting outlining the Options Consultation
25 th Jan 2013	Trunks Alley	Traveller neighbour (supporter)	Telephone explanation of Options Consultation.
7 th Feb 2013	Sites & need in SE London	SE London Councils Gypsy & Traveller Partnership Group	Meeting with consultants re traveller needs assessment
12 th Feb 2013	148 Croydon Rd	Traveller	Meeting outlining the Options Consultation. Discussion re transit sites in London
13 th Feb 2013	Adj Keston Travelling Showmans Ground	Travelling Showmen & Guild legal representative	Meeting outlining the Options Consultation. Discussion of the Needs Assessment
17 th April 2013	King Henry's Drive	Agent	Trying to draw a response from the travellers
26 th April 2013	Croydon sites / transit site	Croydon Council	Meeting with Croydon GTAA consultants
26 th April 2013	Keston Mobile Park (formerly Delaney & Cash Holdings)	Traveller	Update post "Options & Preferred Strategy Document" consultation
9 th May	Sites & need in the SE	Sevenoaks DC, Tonbridge and Malling BC, Tunbridge Wells BC, Wealden DC, Gravesham BC, Gravesham BC, Dartford BC, LB Bexley	Meeting to update / duty to co-operate re assessments & provision
Autumn / Winter 2013/14	Various sites highlighted as preferred Options	Travellers	Advised regarding the Local Plan Process by phone
9 th Jan	Trunks Alley	Travellers & Councils	Meetings with father and

2014		Housing Officer	daughter
16 th Jan 2014	Sites & need in SE London	ORS on behalf of Bexley and Lambeth	duty to co-operate discussion to support their Needs Assessment
16 th Jan	All Sites		Advised re consultation
Mid Feb	Archies Stables		Advice to the inquiry re evidence base.
Late Feb	Keston Travelling Showmens Park	Toni at The Showmans Guild (01784 455120)	Plot / caravan data to complete the caravan count
27 th Feb	"The Bungalow" Star Lane	Bill Saunders	Advised regarding Local Plan. Outlined the issues around looking at new sites & highlighted imminent boundary work re Traveller sites
4 th March 2014	Keston Mobile Park (formerly Delaney & Cash Holdings)	Traveller	Advised regarding Local Plan
March – June 2014	Milles View Southview Trunks Alley Adj Vincents Cottages	3 separate traveller families	Advised regarding Local Plan
13 th May 2014	Star Lane Traveller Site	Travellers Traveller Liaison Bob Mulholland	Discussed site boundary definition (bunds)
Summer 2014 - 2015	All Sites	Travellers	Numerous discussions explaining the Local Plan process, specifically the forthcoming "Draft Allocations, further policies and designations" document"

Unauthorised Encampments

Date (2014)	Location	Vehicles / caravans / tents
10-12 Oct	Crystal Palace Park	1 Living unit, 3 adults, 3 children
02 Oct	Okemore Gardens	1 Living unit, 2 adults, 6 children
28 Sep-30 Sep	Coney Hall Rec	Circa 15 living units plus associated vehicles. No. of occupants U/K
28 Sep-30 Sep	St Mary's Cray High Road, Riverside Gardens Family name unknown	1 Living unit, no. occupants U/K
22 Sept	West Wickham Car Park Family name unknown	12 Living units, associated. Vehicles, no. occupants U/K
03 Sep-04 Sep	Okemore Gardens	1 Living unit, 2 adults
31 Aug	Crystal Palace Park	2 living units, 3 adults, 2 children
28 Aug	Coney Hall Rec	3 Living units, associated. vehicles, 8 adults, 4 children
25 - 26 August	St Georges Car Park Beckenham Family name unknown	1 living unit 1 vehicle No. of occupants U/K
22 - 24 Aug	Beckenham Spa Leisure Centre Family name unknown	8 Living units, 9. vehicles No. of occupants U/K
20 - 21 Aug	Odeon Cinema Beckenham	3 Living units, 3 vehicles, No. of occupants U/K
28 - 31 July	National Sports Centre, CPP Family name unknown	Circa 15+ living units plus associated. vehicles. No. of occupants U/K
22 July	Crystal Palace Park	4 Living units plus associated. vehicles, 8 adults, 5 children
17 July	Green Street Green Family name unknown	8 Living units plus associated. vehicles, 6 adults, 15 children
14 - 15 July	LA Fitness Sandy Lane Family name unknown	8 vehicles No. of occupants U/K
19 - 20 June	Access to former All Saints school Family name unknown	6 occupiers
13 - 15 May	Access to former All Saints school Family name unknown	8 occupiers
17 April	Crystal Palace Park	1 Living unit, 2 adults
14 April	Darrick Wood Meadow	9 Living units plus associated. vehicles, 14 adults, 26 children
4 -5 April	Beckenham Spa Leisure Centre	1 Living unit, 2 adults
7 Feb	Goddington Park Family name unknown	14 living units, 13 vehicles, no. occupants U/K.

