

To: Inspector Kelly Ford, via Pauline Butcher, Inspection Programme Officer

12 March 2026

Dear Inspector Ford,

Having consulted with 19 members of the Gypsy, Traveller and Travelling showpeople's communities in Camden, *London Gypsies and Travellers* would like to submit a statement with additional information pertinent to Issue 3, Questions 53-63 of the revised MIQs dated 9 February 2026. This statement complements our representations already made in the context of Regulation 19, which are partly captured in the Topic Paper "Meeting the Accommodation needs of Gypsies and Travellers and Travelling Showpeople" of October 2025. In this statement, we raise the following matters that are relevant to Issue 3:

1. The figure of need is an undercount (Question 53).
2. The need will not be met by allocations C27 (adjacent to Constable House) and S20 (on Freight Lane – Questions 54 and 55).
3. The reasons for excluding 18 possible locations are based on unjustified methods (Question 60).
4. Policy H11 inaccurately describes the North Fairground travelling showpeople's site (Question 57).
5. The North Fairground is not adequately safeguarded, and neither are the Traveller sites.
6. Policy H11 does not address negotiated stopping approaches (Question 58).
7. Reliance on windfall sites proved ineffective in the past (Question 61).
8. There is no accountability for past non-delivery of pitches and for resulting Gypsy and Traveller homelessness (Question 62).
9. Proposed modifications (Question 63).

Please see below for elaboration on the first four points. The rest can be discussed in more depth at the hearing, should the Inspector require more information.

We look forward to discussing the Council's response and to speaking on these matters at the examination hearing in May.

Yours,  
Dr Nancy Hawker  
Policy and Research Officer  
London Gypsies and Travellers

### **1. The figure of need is an undercount (Question 53).**

The plan's figure of need – 11 pitches by 2032 – is taken from the GLA's London Gypsy and Traveller Accommodation Needs Assessment published on 25 November 2025 (London GTANA 2025). The methodology and findings of the London GTANA 2025 are contested by community experts on the following basis:

- The London GTANA 2025 bases its calculations on the ONS Census, which undercounted Gypsies and Travellers by more than half. The London GTANA 2025 used 8,196 as the baseline Gypsy and Traveller population figure for London. More accurate calculations based on local government sources, although still underestimates, put the current population at 20,000. Consequently, all figures in the London GTANA 2025 undercount by more than half.
- The London GTANA 2025 proposed that 19% of Gypsies and Travellers who are currently living in standard “bricks-and-mortar” housing would need to move to culturally suitable accommodation. However, the data collection for the same London GTANA 2025 found that 74% of community members surveyed had stated that standard housing did not meet their cultural needs. A human rights-based method using the same data yields the rate of 60% need to move from “bricks-and-mortar” to culturally suitable accommodation. Applying that rate to correct population figures results in the need to supply 2,363 new pitches within five years, rather than 851 new pitches, as the London GTANA 2025 proposed until 2032. Accordingly, the London GTANA 2025 vastly underestimates the need arising from Gypsies and Travellers stuck in unsuitable accommodation due to the catastrophic undersupply of culturally suitable sites.
- The inadequate evidence of the London GTANA 2025 is itself misapplied in the calculation of need for the local plan under examination, which is explained in Appendix 1 of the Topic Paper. The local plan calculation applied the five-year household growth rate three times to cover the periods 2026-31, 2031-36 and 2036-2041 (the span of the local plan), but only applied this growth to households living in pitches. It neglected to calculate how many additional households would be formed in “bricks-and-mortar” after 2032 (after the span of the London GTANA 2025) who would need to move to culturally suitable accommodation.

The last Camden local needs assessment found that 16 additional pitches were needed by 2032. We think that evidence, though published in 2014, is more robust than the London GTANA 2025. Since no pitches were supplied since that assessment, the immediate need for 16 pitches is outstanding, though it is likely to be an underestimate. It would be incorrect to deduct the supply of one pitch on the Carol Street site from that figure of need, because at the time of the assessment and until 2018, Carol Street accommodated 4 pitches. The recent supply only reverted to the original design of the site.

*London Gypsies and Travellers* reached out to community members in Camden in early 2026 to gather views for representation at this examination, and members of 18 households in “bricks-and-mortar” came forward to express their need for culturally suitable accommodation in the next 5 years. Since *London Gypsies and Travellers* relies on community members knowing to contact our organisation, and we do not have the means to access other sources of reliable data on the population of Camden (such as school registers of ethnicities), we consider this figure of need to be the minimum.

**2. The need will not be met by allocations C27 (adjacent to Constable House) and S20 (on Freight Lane – Questions 54 and 55).**

**C27: racist objections but Traveller endorsement.** The proposed 2-3 pitch site next to Constable House was countered by more than 500 objections, many of which were organised by a local real estate management company. Some of the inaccurate and prejudiced objections include the supposed loss of access to playgrounds and green space. The space is an unused lot of cracked concrete surrounded by bushes. It does not meet the purposes of Metropolitan Open Land or of local green spaces. There are actual playgrounds very near, on Maitland Park Road NW3 2HE and on Brocas Close NW3 3LD. There is a wonderful local nature reserve even nearer, on Adelaide Road NW3 3XX.

Other objections mentioned the expected increase of anti-social behaviour, criminality, and ensuing police activity. Others mentioned the unwelcome influx of strangers and foreigners, seeing as they are “already inundated by tourists”. Many objections presumed that Gypsy and Traveller accommodation would be detrimental to nearby schools. We had hoped that the Council would redact overtly racist objections from the documents submitted to the examination, so as to shield our community members, who are now raising the third generation of their families in Camden, from exposure to additional insult.

In contrast to the objections, Camden’s Travellers found the location and situation of the proposed site C27 to be suitable with regards to size, privacy and overlooking. Long-established Traveller families with small children are already living in the vicinity and they know the local church. The company hired to identify available land did not raise any issues with flooding.

**S20: environmental concerns.** The proposed 4-pitch site on Freight Lane was presented for consultation in December 2024 and January 2025 without the contextual information that is now included in the local plan’s allocation S20: the development of 210 housing units in the same site, and the fact that the adjacent cement factory is a safeguarded aggregates site. On the basis of the information available at the time of the consultation, community members had found the Freight Lane location to be suitable, and were hoping to be consulted on shielding from railway noise. However, knowing now that the cement factory would remain, we are very concerned that the site would be subjected to excessive dust pollution, particularly worrying for a Traveller micro-community site where much of the communal living would outdoors, and where the levels of chronic illness are among the highest in England, according to the ONS.

In relation to S20, we would like to ask what mitigation measures would be put in place to alleviate air and noise pollution, and how the effectiveness of those measures would be monitored. Recent research showed widespread environmental racism – whereby minoritised groups are over-concentrated in polluted areas where their health suffers as a consequence – with regards to Gypsy and Traveller sites: see Bloch and Quarmbly, “Environmental racism, segregation and discrimination: Gypsy and Traveller sites in Great Britain”, 2024, who found that 54% of Gypsy and Traveller sites were located less than 100 metres from at least one major hazard such as sewage works, factories and dumps.

In total, allocations C27 and S20 will only provide 6-7 pitches whereas the need is far greater, and therefore the plan fails to demonstrate a five-year supply of pitches.

### 3. The reasons for excluding 18 possible locations are based on unjustified methods (Question 60).

While some of the reasons for excluding locations identified by AECOM are based on unavoidable constraints, certain exclusions are questionable. These fall under either under the criteria of suitability or of deliverability. With regards to suitability criteria, the main problem is that these were not consulted with Gypsies and Travellers. With regards to deliverability, in certain cases the needs and rights of Gypsies and Travellers were not given sufficient policy weight. These are the locations that we propose should be re-examined and potentially included in the local plan:

- **Land South of Carol Street and Land Adjacent to Castlehaven Road.** These two locations were excluded at the “suitability” step of the site identification study due to overlooking by neighbouring buildings. These small plots of land would have expanded the two safeguarded Gypsy and Traveller sites in Camden. The residents do not object to the overlooking of their sites, and indeed have managed their own adaptations for privacy and neighbourly integration. Expanding the sites, even by single pitches that would share existing amenity sheds, would greatly improve the quality of life of Camden’s Traveller families and would meet urgent need. It would also conform with London Plan policy H14 which requires local authorities to conduct periodic audits to identify areas of potential extra capacity.
- **Bassett Street, NW5 4PH.** The location is an in-between space that had been earmarked for residential development that never happened, and local people took the initiative to put in vegetable patches to make use of the space. Guerilla gardening ethos celebrates adaptability: the vegetable beds can be moved to another nearby piece of unwanted land, for instance to the communal space of Halstow Estate NW5 4EU, which is very much in need of community-building greening initiatives. Guerilla gardening is not the same use of space as traditional allotments which are safeguarded for food-growing. The Bassett Street site would be perfect for Traveller families who are already living on the same street but in unsuitable Council housing, which would then be freed up for families on the waiting list.
- **Camley Street.** We understand that two plots on Camley Street were considered and rejected for different reasons, one of them being that the viability of mixed-use development would be compromised if it included Gypsy and Traveller accommodation. Camley Street was where Gypsies and Travellers regularly made stops for decades, until the 1980s. The Travelling cultural memories of Camden at that time are part of the unsung heritage of the borough. The grandchildren of those same families who had guitars and campfires by the canal are now stuck in unsuitable, often temporary, accommodation because these locations have been taken away. One such location that appears not to have been considered for a new Gypsy or Traveller site is at the junction of Granary St and Camley St, where there is an unused overgrown space opposite the St Pancras Coroner’s Court N1C 4PP.

Viability studies often result in plans skewed towards high-profit development which do not meet needs for social and affordable housing, and yet these must be delivered, and so the viability studies are subject to review. We question why the profit in the Freight Lane development of 210 homes, of which 4 Gypsy and Traveller pitches, was just above the viability margin, while the development in Camley Street is expected to be just below viability. There are pitfalls to using the viability justification to exclude accommodation for Gypsies and Travellers: reviews that monitor the delivery of social and affordable homes need equality impact assessments, which include protections against racial discrimination. If social housing in general must be delivered despite impacts on viability, so must culturally suitable housing for protected ethnic groups. Also, the assumption that Gypsy and Traveller accommodation uniquely undermines profit is related to the continued ignorance and denigration of the Gypsy and Traveller history and cultural presence in Camden's urban landscape, which the Council is attempting to not perpetuate in its policy H11.

- **Frideswide Place.** This location was taken off the shortlist before the consultation concluded in January 2025, but after the former Mayor of Camden objected to its proximity to a primary school. We question whether design solutions could have enabled retail delivery, while also providing culturally suitable accommodation.

Community members in Camden found all 18 locations shortlisted by AECOM to be suitable. We recommend returning to the shortlist to find less polluted sites than Freight Lane, and also consider the space at the junction of Granary Street and Camley Street, and the expansion of the existing sites. Gypsies and Travellers should be consulted on the methodology for identifying suitability.

#### **4. Policy H11 inaccurately describes the North Fairground travelling showpeople's site (Question 57).**

The residents of the North Fairground were not consulted or even contacted in the development of the local plan. We fear that the boating community, who also inhabit a culture of nomadism, were also not consulted on the plan.

There has not been an increase in occupants who are vocationally unrelated to fairs. The community is stable with 12 households, most of whom have been established there for many years, some more than 25 years. They have all been associated with fairground work at various times, though they do not travel together as such, and in that way they continue to meet the definition of travelling showpeople in the latest versions of the NPPF and PPTS. It is an established community living there. Half the residents still undertake fairground work in various roles: creative, trading, and administrative. Showpeople also seasonally use the yard for storing equipment and as a base for work.

The North Fairground is a unique site as it has a locally celebrated history of being a Victorian fair and a cultural and leisure destination with photos, videos and oral history testimonies circulating in local archives and historiographic meetings and lectures. The longstanding established community that lives in North Fairground bears testament to that heritage, and it should be protected as such and, in fact, invested in. The community and its historical significance are supported by the local housed neighbours.



*Fun Fair at the Vale of Health, approx. 1910. London Transport Museum Archive*