

Hounslow Local Plan (2020-2041)

Examination

Stage 1 Hearings Note

**Gypsies & Travellers, and Travelling Showpeople
Housing**

February 2026



**London Borough
of Hounslow**

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1.0 Introduction

1.1 This note responds to a request from the Inspectors during Issue 3 of the Matter 3 hearing (Meeting the Borough's Housing Needs) of the Stage 1 Hounslow Local Plan 2020-2041 hearings, held on Friday 16th January 2026. The details of the tasks undertaken in this note are set out in *Documents Requested by Inspectors in Hearings Week 1 2026 February Update* (Document **EX30a**)¹ as follows:

- Explanatory note on the approach to assessing and meeting the housing need for Gypsies, Travellers, and Travelling Showpeople (GTTS).
- Decision to focus on the requirement in the London Plan for a 10-year pitch and plot target, and why the full Plan period need for GTTS has not been met on allocations in full.
- Explanation of the Council's criteria-based approach for the later years of the Plan period, explaining the figures.
- Explanation of why there is no need for transit sites.
- Share available monitoring data on unauthorised pitches.
- Consultant Opinion Research Services to provide a supporting appendix.

In addition, this note also discusses the recently published London Gypsy and Traveller Accommodation Needs Assessment (GTANA) (Document **EX42**)², and explains why the Council's own evidence base is the most appropriate to inform the approach taken in the Local Plan.

1.2 The overall approach the Council has taken to assessing and meeting the specialist housing needs of GTTS is set out in detail in our response to Question 1 of Matter 3 Issue 3, in *LB Hounslow Hearing Statement* (Document **WS3.1**)³. This note therefore focuses on the detailed areas of clarification sought by the Inspectors as set out in **EX30a** and referred to in the points above.

2.0 The London Plan requirement for a 10-year pitch and plot target, and why the full Plan period need for GTTS has not been met on allocations in full

¹ EX30a – [Documents Requested by Inspectors in Hearings Week 1 Update \(February 2026\)](#)

² EX42 – [London Gypsy and Traveller Accommodation Needs Assessment \(GTANA\) \(2025\)](#)

³ WS3.1 - [LB Hounslow Matter 3 Hearing Statement](#)

2.1 Part A of Policy H14 of the London Plan 2021 (Document **ADP1**)⁴ states,

“Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches and must include ten-year pitch targets in their Development Plan Documents.”

The Mayor of London’s Regulation 19 Response/General Conformity Statement (**REP074** of Document **S9**)⁵ also states,

“To be consistent with Policy H14 of the LP2021, LBH should clearly set out their ten-year pitch targets and how they plan to meet those needs in full.”

In response to this, the Council has sought to ensure that Policy SC9 and its supporting text clearly articulates the borough’s 10 year pitch and plot targets through proposing a series of modifications in the Schedule of Suggested Modifications (Document **S11**)⁶, as agreed with the Mayor in the GLA/LBH Statement of Common Ground (Document **EX5e**)⁷.

2.2 These suggested Main Modifications⁸ ensure general conformity with the London Plan by providing clarity around what the borough’s 10 year pitch and plot targets are, and by explaining that the targets will be met on two site allocations as well as intensification and/or expansion of an existing site.

2.3 Both the full Plan period pitch and plot needs and 10 year target have been informed by the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report 2019 (Document **EBSC5**)⁹. The Plan period needs for Gypsy and Traveller pitches are informed by Figures 51 and 111 of **EBSC5** as shown in the excerpts below.

Figure 51 – Additional need for Gypsy and Traveller households in Hounslow that met the PPTS Planning Definition by 5-year periods

Years	0-0	0-5	6-10	11-15	16-20	21-23	Total
	2016-18	2018-23	2023-28	2028-33	2033-38	2038-41	
	0	3	1	1	1	1	7

⁴ ADP1 - [London Plan \(2021\)](#)

⁵ REP074 – [The Mayor of London \(GLA\) Regulation 19 Response/General Conformity Statement](#)

⁶ S11 [Schedule of Suggested Modifications](#)

⁷ EX5e – [Statement of Common Ground between LB Hounslow and the Mayor of London \(October 2025\)](#)

⁸ Suggested Modifications **HLP_C5_05; HLP_C5_07; HLP_C5_09; HLP_C5_10 and HLP_C5_11**

⁹ EBSC5 [West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report \(2019\)](#)

Figure 111 – Additional need for households in Hounslow that did not meet the PPTS Planning Definition by 5-year periods

Years	0-0	0-5	6-10	11-15	16-20	21-23	Total
	2016-18	2018-23	2023-28	2028-33	2033-38	2038-41	
	0	17	2	2	3	2	26

2.4 This results in a total Plan period need for 33 pitches comprised of 7 pitches arising from Gypsies and Travellers who met the definition of GTTS in Annex 1 of the Planning Policy for Traveller Sites (PPTS) 2015 version, and 26 pitches arising from Gypsies and Travellers who did not meet the definition of GTTS in Annex 1 of the PPTS 2015.

2.5 The Plan period needs for Travelling Showpeople plots are informed by Figures 53 and 113 of **EBSC5** as shown in the excerpts below.

Figure 53 – Additional need for Travelling Showpeople households in Hounslow that met the PPTS Planning Definition by 5 year periods

Years	0-0	0-5	6-10	11-15	16-20	21-23	Total
	2016-18	2018-23	2023-28	2028-33	2033-38	2038-41	
	0	13	1	1	2	1	18

Figure 113 – Additional need for Travelling Showpeople households in Hounslow that did not meet the PPTS Planning Definition by 5-year periods

Years	0-0	0-5	6-10	11-15	16-20	21-23	Total
	2016-18	2018-23	2023-28	2028-33	2033-38	2038-41	
	0	8	0	0	0	0	8

2.6 This results in a total Plan period need for 26 plots comprised of 18 plots arising from Travelling Showpeople who met the definition of GTTS in Annex 1 of the PPTS 2015, and 8 plots arising from Travelling Showpeople who did not meet the definition of GTTS in Annex 1 of the PPTS 2015. As explained in paragraph 78 of Document **WS3.1** (in answer to Question 1 of Matter 3, Issue 3), the travelling Showpeople site located in Beyber Bridge near Feltham, which hosts 11 existing plots, has been established for a sufficient period of time, which means that the site is now considered to be authorised. As such, the Plan period need for Travelling Showpeople plots is reduced from 26 to 15 plots. This is also acknowledged by consultants Opinion Research Services (ORS) who authored **EBSC5**. ORS has produced a note that is supportive of the Council’s approach to meeting GTTS needs over the Plan period. The note is included as *Appendix 1 - Note from ORS dated 29 January 2026*.

- 2.7 The total Plan period needs for both Gypsies and Travellers and Travelling Showpeople are set out in paragraph 5.40 of the supporting text to Policy SC9.
- 2.8 There is also a small number of “unknown” needs for GTTS in Hounslow identified in Figures 87 and 89 of Document **EBSC5**. These are households where it was not possible to obtain an interview during the fieldwork for the study. As such these households have not been included in Hounslow’s overall need figures for GTTS as they are undetermined need. In paragraph 9 of Appendix 1 to this note, ORS confirm this is an appropriate approach for the Council to take. As the unknown needs are undetermined, they do not represent a concrete or static number as a component of overall GTTS need. Accordingly, as explained by ORS in Appendix 1, the consultants recommended that the Council should put in place a Criteria-Based Local Plan Policy to manage need from Unknown Households.
- 2.9 The Council’s approach to identifying sites to meet the full Plan period GTTS needs is explained in depth in Document **WS3.1** in answer to Question 1 of Matter 3, Issue 3. The Council has allocated two sites that were identified as part of a rigorous and extensive site search exercise documented in **WS3.1**. Whilst the sites identified for allocation provided sufficient capacity to meet the 10 year GTTS targets (together with intensification and/or extension of the existing Hartlands Gypsy and Traveller site), it would not be possible for the full Plan period needs to be met on these two sites. As such, Policy SC9 Part F includes positively worded criteria to help support the delivery of additional provision on non-allocated sites by setting out clear criteria against which planning applications should be assessed.

3.0 The criteria-based approach in Policy SC9 for the later years of the Plan period

- 3.1 Part F of Policy SC9 includes a set of criteria that applications for GTTS sites will be considered against. The policy will be used to assess proposals that come forward on unanticipated sites, in particular within the period after 2030, where any such pitches and/or plots would assist with meeting the full Plan period GTTS needs. As advised by ORS in Appendix 1, the criteria in Part F will also be used to assess sites that could assist with meeting Unknown Needs identified in **EBSC5**.
- 3.2 It is also recommended by ORS that should additional unanticipated need from concealed/doubled-up households or from teenagers living on existing sites emerge during

the remainder of the Plan period, the Criteria-Based section of Policy SC9 will provide a positive framework for considering any sites that come forward.

3.3 Following the discussion during Issue 3 of the Matter 3 hearing held on Friday 16th January 2026, the Council considers that Part F of Policy SC9 would benefit from a number of Main Modifications that will allow the criteria to better reflect the considerations for GTTS sites set out in paragraphs 13, 25, 26, and 27 of the PPTS (December 2024 version). These Main Modifications are set out in Table 1 overleaf:

Table 1: Suggested Main Modifications to Policy SC9 Part F and Corresponding Requirements in the PPTS (2024)

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
To be determined in Document S11	SC9 Accommodation for Gypsies, Travellers and Travelling Showpeople	Part F	126	<p>F. Meet the requirements of the national Planning Policy for Travellers Sites (PPTS) by considering the issues referred to in paragraph 25 of the PPTS (December, 2024) and the following criteria which expects sites to:</p> <p>I. be available and deliverable</p>	<p>25. Local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:</p> <ul style="list-style-type: none"> a) the existing level of local provision and need for sites; b) the availability (or lack) of alternative accommodation for the applicants; c) other personal circumstances of the applicant; d) that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites; 	<p>To update the criteria in Part F of Policy SC9 to better reflect paragraphs 13, 25, 26 and 27 of the PPTS (December 2024 version).</p>

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
				<p>II. <u>make effective use of previously developed, untidy or derelict land as far as possible;</u></p> <p>III. <u>Where possible, be located within existing settlement areas and, for sites that come forward outside of settlement areas,</u> be well related to existing settlements, and have regard to residential amenity;</p>	<p>e) that they should determine applications for sites from any travellers and not just those with local connections.</p> <p>Paragraph 27. When considering applications, local planning authorities should attach weight to the following matters:</p> <p>Paragraph 27a) effective use of previously developed (brownfield), untidy or derelict land;</p> <p>Paragraph 26. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas</p>	

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
				<p><u>IV. Provide a design and layout including soft landscaping, which positively enhances the environment and positively contributes to the site's openness;</u></p> <p><u>V. promote opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children, where feasible;</u></p> <p><u>VI. use site boundary treatments and hard landscaping arrangements that avoid isolating the site from the surrounding community;</u></p>	<p>respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure.</p> <p>Paragraph 27b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;</p> <p>Paragraph 27c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children</p> <p>Paragraph 27d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.</p>	

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
				<p>VII. <u>help promote peaceful and integrated co-existence between the site and the local community through the site’s design and location</u></p> <p>IX. <u>have suitable access to appropriate health services;</u></p> <p>X. <u>have suitable access to educational facilities to enable children to attend school on a regular basis;</u></p>	<p>13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: a) promote peaceful and integrated co-existence between the site and the local community;</p> <p>13a) promote peaceful and integrated co-existence between the site and the local community;</p> <p>13b) promote, in collaboration with commissioners of health services, access to appropriate health services;</p> <p>13c) ensure that children can attend school on a regular basis;</p>	

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
				<p><u>XI. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;</u></p> <p><u>XII. help avoid negative impacts from environmental pollution on the health and well-being of site residents and surrounding communities through on-site mitigation measures;</u></p> <p><u>XIII. avoid placing undue pressure on local infrastructure and services;</u></p> <p><u>XIV. be designed in a way that enables traditional lifestyles such as on-site work spaces to contribute to sustainability.</u></p>	<p>13d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;</p> <p>13e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;</p> <p>f) avoid placing undue pressure on local infrastructure and services;</p> <p>h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby</p>	

Modification code	Policy, Map/Figure	Paragraph/ Clause	Page	Modification	Corresponding Section and Paragraph of the PPTS (2024)	Reason for modification
				<p>II. not have unacceptable environmental effects;</p> <p>XV. be well located in relation to the highway network with adequate vehicular and pedestrian access, and have provision for parking and circulation;</p> <p>IV. have good access to essential services including health and education facilities and access to local shops;</p> <p>XVI. be located outside of areas at high risk of flooding, including functional floodplains; and</p> <p>XVII. with regards to sites for Travelling Showpeople, include appropriate provision for the safe storage and maintenance of equipment.</p>	<p>omitting many travel to work journeys) can contribute to sustainability.</p> <p>g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.</p>	

4.0 Transit Sites

4.1 The Inspectors have requested that the Council provides available monitoring data on unauthorised pitches in Hounslow as part of this note. A timeframe of 01/01/2019 to 25/02/2026 has been used, to allow any such encampments to be captured from the date of **EBSC5** to the date this Note was prepared. The Council has checked its internal monitoring records, and can confirm no unauthorised encampments have occurred on privately owned land in the borough. In respect of Council-owned land, it has not been possible to locate monitoring data for unauthorised encampments in the borough. As such, in order to provide a dataset for unauthorised encampments in Hounslow, the Council has utilised information in the public domain to collate the data required, covering the same timeframe. These are set out in Table 1 below.

Table 1: Unauthorised Traveller Encampments in Hounslow Borough from 2019-2026

Year of Unauthorised Encampment	Location	Number of Caravans (where known)	Source of Information
2025	Brent Lea Recreation Ground, Brentford, TW8 8JQ	'At least 5 caravans'	BrentfordTW8 - Travellers Occupy Brent Lea Recreation Ground
2023	Brent Lea Recreation Ground, Brentford, TW8 8JQ	4 caravans	BrentfordTW8 - Travellers Quit Brent Lea After Eviction Notice Served
2023	Redlees Park, Worton Road, Isleworth, TW7 6DW	Not stated	Hounslow Herald – Council Begins Process to Move Travellers from Redlees Park
2023	Tesco Osterley car park, Grant Way, Isleworth, TW7 5NZ	Not stated	BrentfordTW8 - Large Groups of Travellers Descend on the Area
2023	Gunnersbury Park, Popes Lane, London, W3 8LQ	Not stated	BrentfordTW8 - Travellers Quit Brent Lea After Eviction Notice Served
2023	Chiswick Back Common, Fishers Lane, Chiswick, London, W4 1YB	Not stated	ChiswickW4 - Travellers Occupy Chiswick Back Common
2023	Dukes Meadows, Chiswick, London, W4 2TL	7 caravans	Chiswick Calendar - Traveller group depart Dukes Meadows

Year of Unauthorised Encampment	Location	Number of Caravans (where known)	Source of Information
2023	Turnham Green Terrace, Chiswick, London, W4 1QN	5 caravans	Chiswick Calendar - Traveller group leave Chiswick Back Common
2023	Bedfont Lane, Feltham, TW14 8AX	Not stated	Agenda item - Open Forum London Borough of Hounslow - Meeting of Bedfont and Feltham Area Forum, Thursday, 15 June 2023 6:30 pm (Item 5.)
2019	Essex Place, Chiswick, W4 5UT	Not stated	Chiswick Calendar – “ Hounslow Council gets High Court injunction against Traveller encampments ”
2019	Chiswick Back Common, Fishers Lane, Chiswick, London, W4 1YB	Not stated	Chiswick Calendar – “ LB Hounslow takes legal action after travellers party weekend ”
2019	Dukes Meadows, Chiswick, London, W4 2TL	10 caravans	Chiswick W4 - Chiswick Traveller Incursions 'Just The Beginning'
2019	Stamford Brook Car Park, Chiswick, London, W6 0XY	Not stated	Chiswick Calendar – Hounslow Council gets High Court injunction against Traveller encampments

4.2 Based in this information alone, it is illustrated that 13 separate unauthorised encampments have occurred in Hounslow on Council owned land between 1st January 2019 and 25th February 2026.

4.3 It should be noted that the incidents listed in Table 1 represent a minimum count of unauthorised traveller encampments reported in local media across the timeframe covered in this search. They do not constitute a comprehensive or official record of all incursions within the Borough of Hounslow during this period. Local news coverage is selective and typically focuses on larger, more visible, or more contentious encampments; so smaller or short duration incidents may not have been reported.

4.4 Caravan numbers are included only where explicitly stated in the source articles and may reflect approximate figures at a specific point in time rather than peak occupancy. In several cases, no caravan count was provided. Locations appearing more than once in different years are treated as separate incidents based on reporting, but it has not been independently verified whether they relate to entirely distinct events or closely timed

movements. The absence of reporting in particular years should not necessarily be interpreted as evidence that no incursions occurred during those periods.

4.5 In paragraphs 10 and 11 of Appendix 1, ORS explain that, as recommended in **EBSC5**, the Council should consider the use of management-based approaches to dealing with unauthorised encampments, and that negotiated stopping agreements could also be considered as this is an approach advocated across London following research conducted by London Gypsies and Travellers and De Montfort University in 2019. As such, the Local Plan does not make provision for a transit site, as this would not follow the recommendations in the Plan's supporting evidence.

5.0 London-wide GTANA

5.1 Since the submission of the Local Plan for Examination in June 2025, the Greater London Authority (GLA) published the London Gypsy and Traveller Accommodation Needs Assessment (Document **EX42**) in November 2025. The Council has reviewed **EX42**, and having considered its methodology, scope and assumptions, and comparing these with the established evidence used to inform the Plan, it is not considered that **EX42** would provide a sufficiently locally robust or policy compliant basis for determining Hounslow's specialist GTTS housing needs. By contrast, **EBSC5**, having now been reviewed in light of EX42 by the Council and ORS, is considered to remain a methodologically sound, appropriately detailed, and relevant evidence base for GTTS accommodation needs.

5.2 **EBSC5** is built on extensive engagement with Gypsy, Traveller and Travelling Showpeople households across Hounslow (and the wider West London boroughs). As set out in section 6 of **EBSC5**, the study was underpinned by on-site, face-to-face interviews with the majority of households engaged, enabling a detailed understanding of local circumstances and household-level accommodation needs. This has been reconfirmed by ORS in paragraph 13 of Appendix 1. ORS emphasise that this approach accords with long-established industry standards and the requirements of the PPTS (2015), NPPF (2018) and Housing and Planning Act 2016, and that their methodology has been repeatedly found sound across numerous Local Plan examinations. ORS also conclude that there have been no substantive changes to the GTTS population or site provision since **EBSC5** was undertaken, aside from expected demographic changes, affirming that the evidence remains current (see paragraph 7 of Appendix 1).

5.3 By contrast, significant concerns arise from the methodology and evidential foundations of **EX42**. In Appendix 1, ORS note that the GLA study appears to rely largely on a desk-based approach, with no clear evidence that site-level engagement or face-to-face household interviews formed part of the assessment. In the context of GTTS needs, which are highly localised and dependent on direct engagement with known households, the absence of such fieldwork limits the reliability of **EX42** as a tool for assessing borough-level need. ORS therefore advise that the GLA study “... *cannot be considered to be a robust assessment of need based upon local evidence*” (Appendix 1, paragraph 14).

5.4 It should also be noted that **EX42** assesses GTTS need for a 10 year period covering 2022–2032. As highlighted by ORS in Appendix 1, this does not inform needs over the full Plan period and, given the GLA study’s base date, it now only projects forward for a six-year period. By contrast, **EBSC5** identifies GTTS needs to up 2041, ensuring the evidence is aligned with the full plan Period.

5.5 Furthermore, **EX42** introduces assumptions that are not supported by local evidence, most notably in relation to Gypsy and Traveller households living in bricks and mortar accommodation, whereby the study includes a need for 33 pitches between 22/23 and 31/32 arising from households living in bricks and mortar. ORS indicate that the approach the GLA study takes to derive need figures for bricks and mortar housing is “wholly unevidenced” and significantly out of line with established findings from GTANA studies across England and Wales, which consistently show very low levels of genuine need arising from bricks and mortar households (Appendix 1, paragraphs 17 and 18). In Hounslow specifically, ORS found only seven households with a demonstrable need to move from bricks and mortar to a site, and this evidence has already been incorporated into **EBSC5**, with the approach taken discussed in **WS3.1** (paragraph 94). ORS advise they are preparing a detailed Technical Note with nationwide coverage that will set out evidence to demonstrate that the vast majority of Travellers who live in bricks and mortar do so through choice and do not need to seek to move to a pitch or plot.

5.6 Taken together, these issues demonstrate there is a notable difference between the locally grounded, methodologically robust ORS study and the more generalised, less transparent approach taken in the GLA London-wide study. **EBSC5** provides the detailed,

policy-compliant and up-to-date evidence required to support the Local Plan's approach to meeting GTTS needs. The study uses a robust and repeatedly validated methodology; remains up to date following review by the consultants who prepared it; reflects detailed household level evidence specific to Hounslow; and provides a reliable basis for identifying and planning for GTTS needs over the Plan period, to which the study is aligned.

5.7 In contrast, **EX42** does not represent a sufficiently robust or locally specific assessment of need to underpin the Plan. Its methodology, timeframe, and assumptions are not consistent with the PPTS and diverge from established evidence on local accommodation need.

5.8 For these reasons, the Council considers that **EBSC5** remains the appropriate and robust evidence base for the Local Plan.

Appendix 1

Note from Opinion Research Services dated 29

January 2026

Chris Kirk
Planning Policy Team Leader
Spatial Planning
Regeneration, Housing and Environmental Services
London Borough of Hounslow

29/01/2026

Dear Chris

London Borough of Hounslow Local Plan Examination 2026

In response to the request from the Council for Opinion Research Services (ORS) to prepare a formal note responding to Q2 (a) in the Inspectors MIQs for the Examination of the Hounslow Local Plan I can provide the following.

Q2) To what extent are the West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (WL-GTAA) and the Hounslow Site Allocations and Capacity Assessment (SACA) - Gypsy Traveller and Travelling Showpeople Accommodation Assessment Addendum (2024) considered to:

a) Provide a robust assessment of need and is the evidence, sufficiently up-to-date and reflective of current circumstances?

West London Alliance GTAA (2019)

1. ORS consider the assessment of need for Hounslow that was included in the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) that was completed in January 2019 continues to be robust.
2. The GTAA still provides a credible evidence base which can be used to aid the preparation and implementation of Local Plan Policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2016-2041 - exceeding the 15 year period required by the PPTS in Paragraph 10.
3. The GTAA was completed following a robust methodology based on industry standards as set out in a range of Legislation and Government Guidance at the time of its completion. The study supported the requirements of the Planning Policy for Traveller Sites (PPTS) 2015, and also the requirements of the National Planning Policy Framework (NPPF) 2018 and the Housing and Planning Act (2016).
4. ORS would also note that their GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Charnwood, Cheltenham, Colchester,

Cotswold, Daventry, Ealing, East Hertfordshire, Elmbridge, Gloucester, Kings Lynn, Leicester, Maldon, Milton Keynes, Newark and Sherwood, Newham, Runnymede, Rutland, South Cambridgeshire, South Northamptonshire, South Staffordshire, Spelthorne, St Albans, Tewkesbury, and Waverley.

5. Whilst the PPTS planning definition of a Traveller has changed since the GTAA was completed (in 2023 and again in 2024) the outcomes of the GTAA do still meet the requirements of these changes to the planning definition as it included a full assessment of need for all Travellers – but simply reported them separately as required by the 2015 PPTS definition at the time.
6. In response to the changes to the PPTS planning definition of a Traveller ORS note that the Council are seeking to meet all identified need for Gypsies, Travellers and Travelling Showpeople in line with the current PPTS planning definition through a combination of new site and yard allocations, and through limited intensification on the public site at The Hartlands. In the view of ORS this is now the appropriate approach to be taking following the changes to the PPTS planning definition.
7. Whilst the GTAA was completed in 2019 ORS have discussed in detail with the Council whether there have been any substantive changes to the Gypsy, Travelling and Travelling Showpeople population living on sites and yards in Hounslow since this date. As such ORS have concluded that other than demographic changes (i.e. the population has aged) there have been no additional pitches or plots permitted. In addition ORS note that a decision has been made that the previously unauthorised Travelling Showpeople yard at Beyber Bridge has now been found to be lawful – therefore reducing need for Travelling Showpeople that was identified in the GTAA by 11 plots.
8. Should any additional need from concealed/doubled-up households or from teenagers living on existing sites emerge, this can be dealt with through the Criteria-Based Policy SC9.
9. Whilst the GTAA also identified a need for 7 pitches from households where it was not possible to complete an interview (Unknown Households) the Council have not made allocations to address this need. ORS recommended that the Council should put in place a Criteria-Based Local Plan Policy (which they have in Policy SC9) to manage the need from Unknown Households, as well as to deal with any potential windfall applications, potential need from in-migration, or any need arising from bricks and mortar.
10. The GTAA also considered the need for Transit provision and concluded that due to very small numbers of encampments in the West London Alliance area it was not

recommended that there was a need for any transit provision at the time. It is understood that the situation has not changed since the 2019 GTAA was completed.

11. The GTAA recommended that the Council should consider the use of management-based approaches to dealing with unauthorised encampments and that negotiated stopping agreements could also be considered – an approach across London advocated following research conducted by London Gypsies and Travellers and De Montfort University in 2019¹⁰.

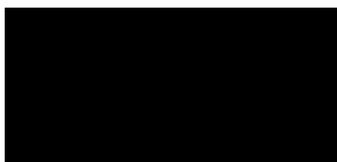
London GTAA (2025)

12. Since the publication of the West London Alliance GTAA in 2019 a new London-wide GTAA has been completed and published in November 2025. This followed a very different and predominantly desk-based methodology to that used by ORS to complete the West London Alliance GTAA.
13. The approach followed by ORS to complete and review the GTAA for Hounslow was evidence-based and included face-to face interviews with the majority of Travellers living on sites and yards to identify their household accommodation needs.
14. It is unclear whether the new London GTAA followed this approach and therefore cannot be considered to be a robust assessment of need based upon local evidence.
15. It should also be noted that the new London GTAA only covers a 10 year period from 2022-2032. As such it does not meet the 15 year requirements of national policy (i.e. the PPTS), and due to a baseline date of 2022 only now covers a current 6 year period since its publication. As such it does not provide the necessary need figures to satisfy the requirements of Paragraph 10 in the PPTS: *Local planning authorities should, in producing their Local Plan: a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.* The ORS GTAA does by covering the period to 2041.
16. In Hounslow the new London GTAA estimated a 10 year need for Gypsies and Travellers for 35 pitches and a 10 year need for Travelling Showpeople for 28 plots. Overall these figures are broadly in line with the outcomes of the GTAA that was completed by ORS.

¹⁰ https://www.londongypsiesandtravellers.org.uk/wp-content/uploads/2019/11/LGT_report_28Nov_web.pdf

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17. However, for Gypsies and Travellers the London GTAA includes a substantial, and in the view of ORS wholly unevidenced, need for 33 pitches from households living in bricks and mortar.
 18. ORS have completed a large number of GTAAs and have consistently found very low levels of need arising from households living in bricks and mortar across England and Wales.
 19. ORS are in the process of preparing a detailed Technical Note to set out evidence to demonstrate that the vast majority of Travellers who live in bricks and mortar do so through choice and have no wish or need to move to a site. There are some who have a *desire* to move to a site but this is not evidenced by a *need* to move.
 20. The emerging conclusions of the Technical Note suggest an average need from bricks and mortar of 2.5 households for each Local Planning Authority across England over a typical 15 year GTAA period, unless local evidence suggests otherwise and nowhere near the figures put forward in the new London GTAA.
 21. In Hounslow local evidence shows that there were 7 households in bricks and mortar who demonstrated a local *need* for pitches on a public site in Hounslow. This finding is considered to present a more accurate picture of the situation locally and was, therefore, used in the GTAA. If any further need from bricks and mortar arises it can be dealt with through Policy SC9.
 22. As stated in paragraph 3.20 of the WL-GTAA 2019, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known based on the wide range of publicity put in place.

Regards



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