



**Dacorum & Watford
Caravan and Houseboat Dweller
Accommodation Needs Assessment**

Report

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1. Executive Summary

The Study

- 1.1 Provisions set out in the Housing and Planning Act (2016) include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. The purpose of this study is to consider these needs for Dacorum Borough Council and Watford Borough Council (the Councils). It should be read alongside the Gypsy and Traveller Accommodation Assessments (GTAAs) that have also been completed for Dacorum and Watford as part of a wider assessment of accommodation need.
- 1.2 The background to the study is set out in Chapter 2 and the outcomes can be found in Chapter 3. A Glossary of Terms can be found in Appendix A.

Summary of Need for Caravan Dwellers

- 1.3 It is not considered that there is a direct need for any additional residential caravan pitches in Dacorum and Watford that is driven by a local demand for additional pitches, but instead that more pitches could help to address the wider housing needs of the area.
- 1.4 Therefore, the only evidenced need is for Gypsies and Travellers who do not meet the planning definition of a Traveller, this figure forms a small part of the existing OAN and is not additional to it.

Summary of Need for Boat Dwellers

- 1.5 It is not considered that there is a direct need for any additional permanent residential moorings in Dacorum and Watford that is driven by a local demand for additional moorings, but instead that more moorings could help to address the wider housing needs of the area. ORS would suggest the role of additional moorings in meeting current housing needs in Dacorum and Watford is likely to be very small and this figure would form part of the existing OAN and is not an additional to it.

2. Introduction

Background

- 2.1 The Dacorum and Watford Gypsy and Traveller Accommodation Assessment's (GTAA's) 2018 formally consider the needs of any households in the two local authority areas who meet the planning definition of a Traveller contained within the 2015 update of Planning Policy for Traveller Sites (PPTS). In addition, the GTAA's consider the accommodation needs of Travellers that do not meet the planning definition, and the accommodation needs of unknown households where it was not possible to interview Travellers households.
- 2.2 The GTAA's provides an evidence base to help to enable the Councils to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the National Planning Policy Framework (NPPF) 2018, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016.
- 2.3 However, whilst the GTAA's include an assessment of the accommodation needs of all Travellers living in caravans identified as living in Dacorum and Watford, provisions set out in the Housing and Planning Act (2016) include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to also consider the needs of all people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.
- 2.4 The wider needs of caravan and boat dwellers are now starting to be specifically addressed as part new Strategic Housing Market Assessments (SHMAs) or Housing and Economic Development Needs Assessments (HEDNAs). However, the South West Hertfordshire Strategic Housing Market Assessment (SHMA) (January 2016) was published before the requirements of the Housing and Planning Act (2016) came in to force. Therefore, whilst included in the overall OAN, the needs of caravan dwellers and boat dwellers were not specifically identified alongside the housing needs of other groups including older persons, students and households with children.
- 2.5 The South West Hertfordshire authorities are updating their SHMA (now referred to as the Local Housing Needs Assessment) to identify the need for different types of housing and the housing needs of different groups within local communities up to 2036. However, the study was not available at the time of preparing this assessment, particularly to await the potential release of changes to the Government's standard methodology for calculating housing need.
- 2.6 This document therefore provides evidence in relation the needs of wider Caravan and Boat Dwellers for Dacorum and Watford.

Policy and Guidance

- 2.7 Planning Policy for Traveller Sites (PPTS) sets out Government Policy in relation to planning for Gypsies, Travellers and Travelling Showpeople and the assessment of need for those households that meet the planning definition set out in Annex 1 of the PPTS.
- 2.8 The Housing and Planning Act (2016) includes a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people

residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. It should also be noted that the Housing and Planning Act 2016 also removed the 2 sections in the 2004 Housing Act that placed a statutory requirement on Councils to conduct a specific assessment of need for Travellers. However, PPTS still sets out that local planning authorities should make their own assessment of need for the purposes of planning, but that this only formally relates to households who meet the current planning definition of a Traveller.

- 2.9 Paragraph 61 of the revised NPPF (2018) sets out that the needs of Travellers that do not meet the planning definition should be specifically assessed as part of the size, type and tenure of housing needed for different groups in the community and sets out that the needs of Travellers that meet the planning definition should be assessed under the PPTS.
- 2.10 The Housing Delivery Test Measurement Rule Book (MHCLG – July 2018) confirms that the assessed needs for Travellers that meet the planning definition are not included in the overall OAN and that *where applicable, the housing requirement for Gypsies and Travellers under the Planning Policy for Traveller Sites (PPTS) will be added to the [latest adopted] housing requirement... and that Plan-making authorities should inform MHCLG of their housing requirement for Gypsies and Travellers under the PPTS through the annual Housing Delivery Test DELTA data collection.*
- 2.11 Section 29 of the Caravan Sites and Control of Development Act (1960) defines a caravan as any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted (excluding tents or rolling stock).

3. Need for Caravan and Boat Dwellers

Non-Travelling Gypsies and Travellers and other Caravans Dwellers

- 3.1 Whilst Draft Guidance¹ issued by the Government suggests a detailed assessment of need through the collection of primary data (i.e. site and household interviews), ORS feel that this approach is only needed to assess the needs of the Gypsy and Traveller Community. Indeed, the Guidance continues to set out that the exact approach will need to be adapted to local circumstances. ORS advocate an assessment of need primarily based on the analysis of secondary data for other caravan dwellers.
- 3.2 Aside from the specific needs of Gypsies, Travellers and Travelling Showpeople, ORS are of the view that there are 3 types of potential need associated with those who live permanently in a caravan, or who wish to live permanently in a caravan. This is as a result of intelligence gathered during recent housing need studies that ORS have completed or are working on:
- » Need for additional pitches on traditional mobile home or park home sites.
 - » Need for additional pitches to accommodate workers (often migrant workers and often found living on sites conditioned for Gypsy or Traveller households).
 - » Need for additional pitches as an alternative type of affordable housing.
- 3.3 Additional support for the view that caravans are now being seen as an alternative type of affordable housing is provided in research undertaken by Inside Housing in 2016. As an example, the research identified that Canvey Island's Thorney Bay Village has more Housing Benefit claims registered to it than any other caravan or mobile home site in the UK. In 2016, £1.9m of Housing Benefit was paid to addresses on this site.
- 3.4 The investigation also found that there are thousands of people on low incomes currently living on caravan and mobile home parks across the UK and revealed that the 271 councils that provided information to Inside Housing made more than 12,000 Housing Benefit payments to addresses on caravan and mobile home parks in the UK – with 11,162 of these being made in England.
- 3.5 As another example, in 2014, Folkestone Council found “emerging evidence from around the district that some residents are occupying holiday-let caravans as their main or sole home”. It found 45 occupants in receipt of housing benefit from holiday-let caravans. Denbighshire Council also estimated that “175 individuals in the county were living all year round in ‘holiday’ caravans.”
- 3.6 Whilst it is accepted that some of the Housing benefit claimants are likely to be Gypsies and Travellers, comparison with the Traveller Caravan Count data estimated that some 7,300 of the payments would have been made to non-Gypsies and Travellers.
- 3.7 The GTAA's for Dacorum and Watford² have identified very low levels of need for additional caravan pitches for Gypsies and Travellers that meet the current planning definition when compared to the potential overall OAN for market housing (7 additional pitches in Dacorum and 2 additional pitches in Watford).

¹ “Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats.” (March 2016) DCLG.

² *Dacorum and Watford Gypsy and Traveller Accommodation Assessments* (October 2018) Opinion Research Services.

- 3.8 The GTAAs also identified a need for 69 additional pitches for Gypsy and Traveller households that do not meet the planning definition in Dacorum, and a need for 7 additional pitches for Gypsy and Traveller households that do not meet the planning definition in Watford. In addition, a small potential need for up to 4 additional pitches was identified in Dacorum from households where it was not possible to complete an interview.
- 3.9 Under provisions set out in the Housing and Planning Act (2016) the need from these Gypsy and Traveller households that do not meet the planning definition will form a subset of the wider need arising from households residing in caravans. Overall this is likely to be only a very small proportion of the total potential OAN in Dacorum and Watford. However, it does represent a potentially important need because Romany, Irish and Scottish Travellers may claim a right to be provided with culturally appropriate housing (caravans) based on their protected ethnic status in the Equality Act (2010). It should also be noted that a separate 5-year land supply for this group is not required as the needs under the Equalities Act are those of a housing requirement rather than a planning requirement under the PPTS.
- 3.10 Beyond the identified need from Gypsies and Travellers who do not meet the planning definition, there is also a wider role for residential caravan parks to help deliver part of the OAN. Currently, there are believed to be 4 residential caravan parks in Dacorum which are not restricted to Gypsy and Traveller occupancy with approximately 240 residential pitches for static caravans (see Figure 1). All these caravan parks are understood to be occupied on a permanent basis, as opposed to being second homes. There are not believed to be any residential caravan parks in Watford.

Figure 1 - Residential Caravan Parks in Dacorum

	Pitches
Beech Park, Wigginton	117
The Limit Mobile Home Park, Northchurch	56
Flaunden Mobile Home Park, Flaunden	40
Scatterdells Caravan Park, Chipperfield	30
TOTAL	243

- 3.11 In addition, at the time of the 2011 Census (excluding Gypsies and Travellers) there were a total of 246 households recorded as being resident in Dacorum living in caravans (consistent with the figures in Table 1) and a total of 10 households recorded as being resident in Watford living in caravans. In Dacorum this represents 0.4% of total housing stock and in Watford it represents just 0.03% of total housing stock.
- 3.12 Putting all of this together in terms of identifying need for any further additional residential caravan pitches for non-Gypsies and Travellers in Dacorum and Watford, there is a situation which requires a careful consideration of the word 'need' as there is no evidence to suggest any specific need for additional pitches in either local authority, but instead an alternative means of meeting a small proportion of general housing need.
- 3.13 Put simply, if more residential caravan pitches were to be made available then there could be a demand for them. However, this is not in response to an evidenced need for additional pitches. If more pitches were to be made available households may choose to live on residential caravan sites due to wider housing market pressures which have made caravans a cheaper option to live in than bricks and mortar housing. In this context, additional residential caravan plots should be seen in the context of providing for a more diverse set of housing options and as part of the wider housing delivery, as opposed to meeting any identified local need.

- 3.14 It is not therefore considered that there is a direct need for any additional residential caravan pitches in Dacorum and Watford that is driven by a local demand for additional pitches, but instead that more pitches could help to address the wider housing needs of the area.
- 3.15 Therefore, the only evidenced need is for Gypsies and Travellers who do not meet the planning definition of a Traveller, this figure forms a small part of the existing OAN and is not additional to it.
- 3.16 The GTAA identifies a need for **69 additional pitches** for households that do not meet the planning definition in Dacorum. This is made up of 18 concealed or doubled-up households of single adults, 1 movement from bricks and mortar, 12 for teenage children living on sites who will be in need of a pitch of their own in the next 5 years, 5 for teenage children living in the bricks and mortar household who will be in need of a pitch of their own in the next 5 years, and 33 from new household formation using a rate of 2.20% derived from the household demographics of the households that were interviewed. In addition, meeting a proportion (75%) of need from unknown households also needs to be considered. Figure 2 summarises the identified need.

Figure 2 – Need for additional pitches in Dacorum

Planning Status	GTAA	SHMA	TOTAL
Meet Planning Definition (+ 25% Unknown)	8 (7+1)	0	8
Not meeting Planning Definition (+ 75% Unknown)	0	72 (69+3)	72
TOTAL	8	72	80

- 3.17 The GTAA identified a need for **7 additional pitches** for households that do not meet the planning definition in Watford. This is made up of 1 concealed or doubled-up household of single adult, 3 movement from bricks and mortar, and 3 from new household formation derived from the demographics of the households that were interviewed. There were no unknown households in Watford. Figure 3 summarises the identified need and Figure 3 summarises the identified need.

Figure 3 – Need for additional pitches in Watford

Planning Status	GTAA	SHMA	TOTAL
Meet Planning Definition (+ 25% Unknown)	2 (2+0)	0	2
Not meeting Planning Definition (+ 75% Unknown)	0	7 (7+0)	7
TOTAL	2	7	9

Boat Dwellers

- 3.18 ORS are of the view that there are 3 types of potential need associated with those who live permanently on a boat, or who may wish to live permanently on a boat:
- » Need for additional permanent residential moorings.
 - » Need for additional temporary moorings for boats with Continual Cruiser Licences.
 - » Need for additional waterside facilities.
- 3.19 The Grand Union Canal (GUC) runs the length of Dacorum and passes through each of the main towns and into open countryside, much of which is covered by the Green Belt. It is used by many houseboats and leisure craft. Information from the Council indicates there are over 200 offline moorings along the Grand Union Canal in Dacorum at 3 residential marinas (see Figure 4). It is understood that most of these moorings are leisure moorings as opposed to permanent residential moorings. Planning permission was recently granted (and implemented) for the change of use of 10 of the existing moorings from leisure to residential at the Cow Roast Marina near Tring – taking the total number of permanent residential moorings to 26.

Figure 4 - Residential Moorings in Dacorum

	Moorings
Cow Roast Marina, Tring	110
Apsley Marina, Hemel Hempstead	65
Winkwell Marina, Hemel Hempstead	30
TOTAL	195

- 3.20 The draft DCLG Guidance provides limited advice on how to consider the needs of people residing in or resorting to moorings for houseboats. The Guidance was issued in March 2016 with no consultation attached to it and has yet to be issued as official guidance. However, it is understood to have been criticised by organisations representing Boat Dwellers for concentrating too much on identifying need from Caravan Dwellers.
- 3.21 The National Bargee Travellers Association (NBTA) is a volunteer organisation that campaigns and provides advice for itinerant Boat Dwellers on Britain’s waterways. ORS was anticipating that the NBTA would issue their own advice on undertaking an assessment of need for Boat Dwellers following the release of the national Draft Guidance. However, this has not yet been issued, and ORS has had to rely on its own standard approach to assessing need for Boat Dwellers.
- 3.22 As far as need for Boat Dwellers is concerned, it cannot be assumed that all need can be met through the provision of additional moorings as many Boat Dwellers do not seek permanent moorings and navigate waterways on a permanent basis. As such, other issues that need to be considered may include the availability and distance between facilities such as water taps, rubbish disposal, chemical toilet disposal and fuel pumps; the threat of eviction from moorings seen as inappropriate; restrictions placed on boat dwellers through licence restrictions; and access to ‘off-side’ moorings – i.e. those not on a tow path.

3.23 This view is shared by the NBTA who have stated:

The primary issue is "access to facilities" for those who do not have permanent moorings. The Borough can intervene in this regard through the provision of facilities where the navigation authority provision is less than optimal. For the avoidance of doubt facilities provided by a private commercial operation is not sufficient as these can elect to decline provision and (for example in the case of taking water and depositing domestic refuse) regularly do where the boater is not wanting to buy anything. There is no shortage of inadequate provision within the jurisdiction of CRT.

3.24 As with Gypsies and Travellers who do not meet the planning definition of Travellers and wider Caravan Dwellers, permanent Boat Dwellers also form part of the OAN because they are included in the overall population and household projections.

3.25 Data released by the Valuation Office Agency (VOA) in June 2016 indicates that there were no households living in boats as their main place of residence paying Council Tax in Watford and less than 5 households in Dacorum. However, it may well be that tenancy agreements at private marinas for permanent residential moorings include a contribution towards local taxes and rates. Given the number of moorings in Dacorum, it is probable that a number of houseboats on leisure moorings will be occupied at any one time in the borough, but not as a permanent residence. Evidence from across the country indicates that most households with leisure moorings are only able to spend part of the year on their boat and would not pay Council Tax as a main place of residence, while others are Continuous Cruisers who move regularly from location to location with stays of no more than 14 days in any one location.

3.26 The Canal and River Trust³ have reported that the total number of Continuous Cruiser Licences was 4,400 in 2014. Out of those 4,400 boats 23% moved less than 5 kilometres, and 45% moved under 10 kilometres in a year, so a high number of boats are moving around relatively small areas of the canal network. The Canal and River Trust suggest that this is due to affordability as much as preference, with many households moving on to houseboats to find cheaper accommodation.

3.27 The draft Guidance is not particularly relevant or helpful when it comes to assessing need for Boat Dwellers. The first issue to consider is the definition of a houseboat. The Housing and Planning Act defines a "houseboat" as a boat or similar structure designed or adapted for use as a place to live. However, this conflicts with the definition of a houseboat under waterways legislation (for example Section 3 of the British Waterways Act 1971) which suggests that a houseboat is a static vessel and is not used for navigation, as opposed to more mobile Boat Dwellers who do travel either from permanent moorings or as continual cruisers. ORS choose to include all permanent Boat Dwellers in assessments of need as opposed to the more limited definitions of a houseboat.

3.28 In terms of other evidence on the needs of Boat Dwellers, the Canal and River Trust undertook a detailed survey of London's houseboat dwellers⁴ between September and October 2016. In total they received responses from 1,323 boat dwellers who had been recorded on London's waterways in the previous year. In summary the survey found that

» 58% of respondents to the survey said that they use their boat as their primary place of residence.

³ <https://canalrivertrust.org.uk/media/library/2305.pdf>

⁴ <https://canalrivertrust.org.uk/refresh/media/thumbnail/30901-whos-on-londons-boats-survey-summary-report.pdf>

- » 50% of respondents said that affordability/financial reasons were their motivation for living on a boat.
- » 50% of respondents said that they have been living on boats on London's waterways for three years or less.
- » 70% of respondents said that they owned their boats outright, a further 11% said they owned their boat with a loan or mortgage.
- » The top three specific improvement people want to see on the London waterways are (1) more mooring places, (2) more mooring rings, (3) more water points.
- » 45% of respondents said they would have some or definite interest in a mooring if permanent or long-term moorings were more readily available in the London.

3.29 In summary, this suggests that half of all London respondents reported that they lived on a houseboat because of affordability issues; that nearly half of respondents would be interested in a permanent mooring if one was available; and that the main issue raised by Boat Dwellers in London was a lack of permanent moorings.

3.30 Putting all of this together in terms of identifying need for any further additional moorings in Dacorum and Watford, there is again a situation which requires a careful consideration of the word 'need' as there is no evidence to suggest any specific need for additional permanent moorings in either local authority, but instead an alternative means of meeting a small proportion of general housing need. Whilst the Council in Dacorum has been approached by developers enquiring about delivering new marinas and moorings, these are understood to be speculative commercial opportunities, and not in response to identified local need. There are understood to be sufficient temporary moorings along the Grand Union Canal to meet the needs of leisure craft and continuous cruisers.

3.31 If more residential moorings were to be made available on a commercial basis then there could well be a demand for them, as in other parts of the country. However, this is not in response to an evidenced local need for additional moorings to meet local demand. If more moorings were to be made available households may choose to live on houseboats due to wider housing market pressures which have made houseboats a cheaper option to live on than bricks and mortar housing. In this context, additional permanent residential moorings should be seen in the context of providing for a more diverse set of housing options and as part of the wider housing delivery, as opposed to meeting any identified local need.

3.32 It is not therefore considered that there is a direct need for any additional permanent residential moorings in Dacorum and Watford that is driven by a local demand for additional moorings, but instead that more moorings could help to address the wider housing needs of the area. ORS would suggest the role of additional moorings in meeting current housing needs in Dacorum and Watford is likely to be very small and this figure would form part of the existing OAN and is not an additional to it.

Appendix A: Glossary of Terms

Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.
Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.

DCLG	Department of Communities and Local Government
GTAA	Gypsy and Traveller Accommodation Assessment
GTANA	Gypsy and Traveller Accommodation Needs Assessment
HEDNA	Housing and Economic Development Needs Assessment
LPA	Local Planning Authority
MHCLG	Ministry of Housing, Communities and Local Government
OAN	Objectively Assessed Need
ORS	Opinion Research Services
PPTS	Planning Policy for Traveller Sites (PPTS) in August 2015
SHMA	Strategic Housing Market Assessment
TSP	Travelling Showpeople