



Submission to  
**Communities and Local Government Committee on  
Abolition of Regional Spatial Strategies**

**in relation to provision for Gypsies and Travellers**

**London Gypsy and Traveller Unit**  
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**London Gypsy and Traveller Unit**  
6 Westgate Street  
London E8 3RN

[www.lgtu.org.uk](http://www.lgtu.org.uk)  
[info@lgtu.org.uk](mailto:info@lgtu.org.uk)  
Tel 020 8533 2002  
Fax 020 8533 7110

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Communities and Local Government Committee on  
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15<sup>th</sup> September 2010  
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**Summary**

- There is a significant unmet need for pitches for Gypsies and Travellers.
- The response to this need must to be driven by central or regional policy, because of local opposition founded on prejudice and misconceptions.
- Arguments for lower targets have been founded on special pleading, not 'local knowledge'.
- Without a supra-local lead there will be a *reduction in the stock* of pitches.
- Any likely level of financial incentives will have an insignificant impact on the supply of pitches. Other forms of national/regional promotion are important.
- The Gypsy and Traveller Accommodation Needs Assessments (GTAAs) are an invaluable evidence base for future policy in this area. The Government's invitation to local authorities to disregard them is a waste of resources, an abdication of evidence-based planning and a capitulation to local barriers to inclusion.

The London Plan is not, technically, a Regional Spatial Strategy (RSS) and has not been revoked. None-the-less the Mayor has emasculated the London 'regional' policy for Gypsy and Traveller pitches and removed the target as a direct result of the revocation of RSSs. The broad effect on London's Gypsies and Travellers will be the same as in other regions and, in this regard, the case of London is entirely relevant to the Committee's deliberations.<sup>1</sup>

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<sup>1</sup> This explanatory paragraph and the front sheet were not included in the original submission

- **There is a significant unmet need for pitches for Gypsies and Travellers**

This is evidenced by the full set of Gypsy and Traveller Needs Assessments. These were large scale studies conducted throughout the UK and adopted at the level of RSSs and the London Plan. The seriousness of this need is confirmed in reports by CRE and the Rowntree foundation as well as numerous local studies, including the response by the Gypsy and Traveller Community and others to the Draft Replacement London Plan. These showed a need for 800 additional pitches in London over 10 years.

In his recently published alteration to the London Plan the Mayor has disowned all responsibility for a response to this need. Following the Government's revocation of RSS, the Mayor chose to lobby for a greater regional role in areas such as housing finance and to retain all London Plan targets EXCEPT that for Gypsies and Travellers.

- **The response to this need must be driven by central or regional policy, because of local opposition that is driven by prejudice and preconceptions.**

Localism and the abolition of RSS will be a severe blow to this most disadvantaged social group.

“Policy initiatives and political systems that are designed to promote inclusion and equality frequently exclude Gypsies and Travellers. This includes political structures and community development.” [Cemlyn et al 2009]

Rather than promoting inclusion, ‘localism’ will too often mean that the tyranny of the local majority [JS Mill 1859] exacerbates the exclusion of Gypsies and Travellers. There is a substantial body of research [for example, see Cemlyn et al 2009 and CRE 2006] that gives evidence of the prejudice confronting Gypsy and Traveller communities. We give just one example, from the Good Practice Guidance of the Royal Town Planning Institute:

“Development management planners are often under pressure to consider racially motivated and discriminatory views and representations relating to Gypsy and Traveller communities. The incidence and adverse effects of such representations have not necessarily received the systematic attention of those working to eliminate discrimination. There are still circumstances where politicians, practitioners and members of the public apparently consider openly biased, discriminatory and unfounded remarks about Gypsies or Travellers as individuals or communities to be somehow legitimate or acceptable, in circumstances where similar remarks made about other black or ethnic minority communities would be immediately recognised as discriminatory and unacceptable.” [RTPI 2007]

Only a small minority of London Boroughs has shown itself willing to stand up to local pressures in the name of tackling the disadvantage suffered by Gypsies and Travellers.

- **Arguments for lower targets have been founded on special pleading, not ‘local knowledge’.**<sup>2</sup>

Special pleading will lead to an inconsistent set of targets which has no basis in the reality of local circumstances but is the worst kind of post-code lottery.

Bexley LB steadfastly refuses to recognise any need in spite of evidence to the contrary.

Bromley LB contends that its high current pitch provision should reduce its target, while Barnet LB and Westminster LB argue that their lack of sites should reduce theirs.

Barnet LB, with its low housing density, argues that too much weight is given to land availability, while high-density Tower Hamlets LB reasons that too little weight is given to its tight land supply.

Other Boroughs make similar points and it is clear that, without regional targets, most Boroughs will have little trouble justifying a set of inconsistent but politically easy local targets that continue to ignore the needs of Gypsies and Travellers.

Equity between boroughs pre-supposes a supra local authority. Here Haringey LB complains that “It is not clear why Haringey is allocated more additional pitches than some of our neighbouring boroughs” and Greenwich reasons that the amount built in a Borough should “‘make up’ for where pitches have been lost over the last decade. Only after pitches have been added to the ‘shortfall’ boroughs should the remaining pitches need be redistributed across all the Boroughs. It is this approach which will bring equity to the distribution.”

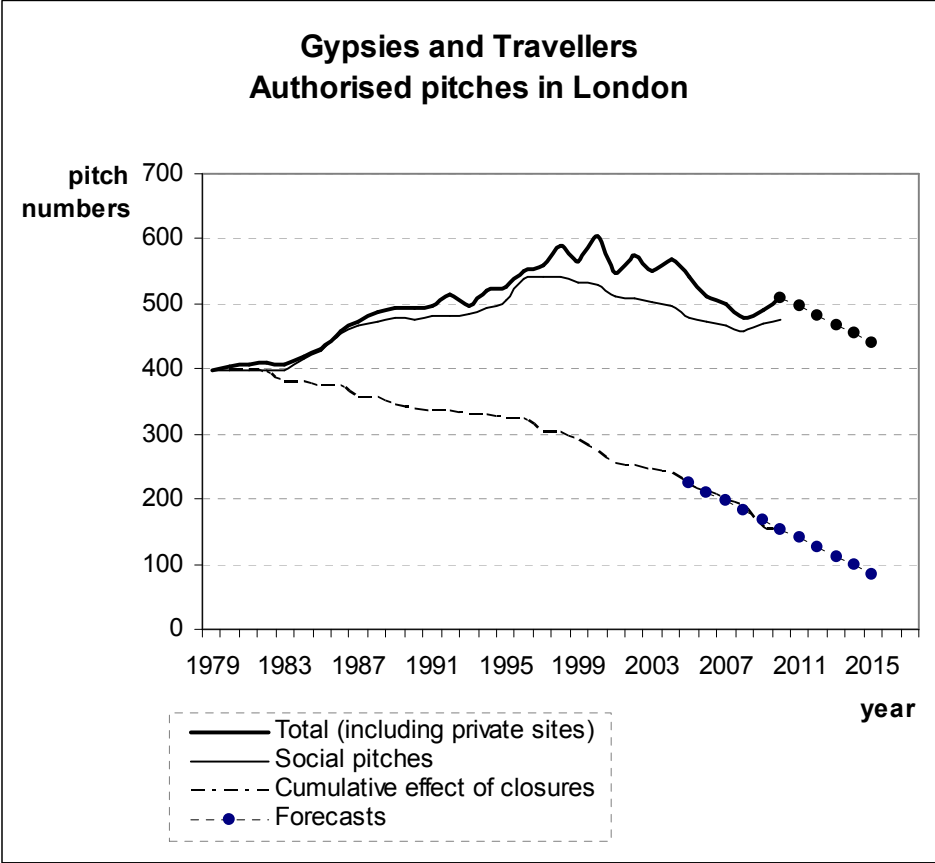
- **Without such a supra-local lead there will be a *reduction in the stock of pitches***

Over the last ten years, before Gypsy and Traveller planning policy was up and running, the following London Boroughs closed Gypsy and Travellers sites [LGTU 2010] in spite of evident need:

-18	Enfield	Montague Rd	2000
-15	Harrow	Watling Farm Close,	1999
-12	Haringey	Wood Green Common	2004
-11	Lewisham	Thurston Rd	2006
-10	Hillingdon	Colne Park	1998
-8	Hackney	Rendlesham Road	97-04
-5	Bexley	Powerscroft	2002
-4	Bark & Dag	Eastbrookend	2003
-3	Camden	Dalby St	2005
-2	Newham	Clays Lane	2003
+3	<i>Hounslow</i>	<i>Hartlands</i>	<i>2004</i>
+8	<i>Brent</i>	<i>Lynton Close</i>	<i>1999</i>

<sup>2</sup> All these points draw on the Boroughs’ representations to the London Plan Enquiry.

There is a trend of pitch closures which is very long term and will continue with the presently proposed policy. In spite of significant population growth, the number of Gypsy and Traveller pitches in London has fallen by 15% in the last 10 years from 600 to 500. The evidence is that a significant reduction in future pitch numbers will follow the new policy's dampening of new development, driving London's pitch total down towards 400 over the next 5 years.



- **Any likely level of financial incentives will have an insignificant impact on the supply of pitches. Other forms of national/regional promotion are important.**

There is no direct evidence of the effects of incentives on development. However it is evident to any with a working knowledge of the policy area in London that financial incentives alone will have no significant effect on the development of Gypsy and Traveller sites. Much more effective will be positive engagement at the London/Regional/national level through:

- The promotion of the many existing sites that are good neighbours and where the local community *includes* sites residents.
- Building on HCA encouragement of innovative low cost solutions.
- Disseminating good practice such as Croydon's development in full consultation with site residents showing exceptional value for money; and Mendip DC's use of Community Land Trusts in the development of pitches.
- Studies to identify land for further sites should be brought forward, and planning for development begun as land is identified.
- Working towards identifying or creating Registered Social Landlords willing to develop sites.

- **The Gypsy and Traveller Accommodation Needs Assessments (GTAA's) are an invaluable evidence base for future policy in this area. The Government's invitation to local authorities to disregard them is a waste of resources, an abdication of evidence-based planning and a capitulation to local barriers to inclusion.**

A full set of Gypsy and Traveller Needs Assessments was conducted during the last 6 years which were examined and adopted at the regional level. The London Assessment conducted by Fordhams Research with support from the Greater London Authority [GLA 2009]. It was a robust and useful study [LGTU 2010a] with, we understand, a budget of approximately £120,000.

In the latest alteration to the Plan the Mayor states<sup>3</sup>

"Gypsy and Traveller Accommodation Assessments (GTAA's) have been undertaken by all local authorities and if local authorities decide to review the levels of provision these assessments will form a good starting point. However, local authorities are not bound by them". [GLA 2010a]

All the indications are that, in London, the work of the assessment will not be taken forward as a part of the recurrent housing needs assessment in spite of its quality and significance as a data source.

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<sup>3</sup> In this he follows DCLG 2010, para 14

In London, a minimum of £120,000 will have been wasted. This does not include all the officer time involved. In other areas there have been examinations into the assessments and policies which have added significantly to the quality, coherence and consistency of the results. The waste to the nation of disregarding these assessments and examinations will be in the millions of pounds.

The DCLG [2010a] now specifies that

“Local councils are best placed to assess the needs of travellers. The abolition of Regional Strategies means that local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand, and for bringing forward land in DPDs.”

In London, it is clear that this alternative to the GTAA will be a travesty of evidence-based planning.

Cemlynn C, Greenfields M, Burnett S, Matthews Z, Whitwell C. *Inequalities experienced by Gypsy and Traveller Communities: A review*. Research Report 12 EHRC [March 2009]

<http://www.equalityhumanrights.com/Documents/Inequalities%20experienced%20by%20Gypsy%20and%20Traveller%20communities%20-%20a%20review.pdf>

CRE 2006: Commission for Racial Equality. *Common Ground – Equality, good relations and sites for Gypsies and Irish Travellers*, CRE

<http://www.equalityhumanrights.com/en/publicationsandresources/Documents/Race/Common%20ground%20full%20report.pdf>

DCLG (2010) *Letter from the Chief Planning Officer to Local Authorities* (6<sup>th</sup> July 2010)

GLA. (2009). *Consultation draft replacement London Plan*

GLA (2010a). *Minor alterations to the consultation draft replacement London Plan Gypsies and Travellers (including travelling show people) and Aggregates*

LGTU (2010a): London Gypsy and Traveller Unit. (May 2010) *Objection to the London Plan consultation draft replacement and the Minor Alteration - Policy 3.9 Gypsies and Travellers*

Mill JS. (1859). *On Liberty*

RTPI. (2007). Royal Town Planning Institute *Good Practice Note 4: Part C: Accommodation and Site Delivery*