London Gypsy and Traveller Forum response to the Mayor's minor alteration to paragraph 3.9 of the draft London Plan.

The previous submission on paragraph 3.9 of the Mayor's draft London Plan from the London Gypsy and Traveller forum still stands.

The Mayor's minor alteration to the above paragraph was discussed at an extraordinary meeting held on 27th April, attended by 30 people, and this paper is the LGTF response.

The needs of housed Travellers must be included in the London pitch target figure

When the GTAA was first presented to them, the LGTF challenged the use of minimum and maximum figures, stating the latter figure, which is inclusive of the needs of housed Travellers, to be the correct evidence of need, and that there was no justification in separating the needs and calling them maximum and minimum. The government has confirmed this.

The total London pitch target should therefore be 808

By arbitrarily reducing the target by another 60% to 238 and completely excluding consideration of the needs of housed Travellers the Mayor is disregarding all available evidence of need and government guidance. The government guidance states repeatedly that the needs of housed Travellers should be assessed and included in regional Plan pitch targets.

The government response to the draft London Plan and to the minor amendment confirm this.

The GTAA is the best evidence of need available and it is fit for purpose

It is shocking to LGTF to find that the Mayor should at this point deny the validity of the GTAA evidence

The London GTAA was commissioned by the London Boroughs and the GLA, at considerable public expense and in line with government guidance. The research included assessment of the accommodation needs of housed Travellers. It was signed off by the boroughs, the GLA and the government in 2008.

In the minor alteration the Mayor places much emphasis on psychological and cultural aversion to bricks and mortar. Members of the LGTF recognise and confirm that many Travellers experience a real alienation and dysfunction when they live in houses. It is however but one of many factors that government guidance advises to be taken into account. In the experience of the LGTF members, the high mobility of families in houses because of being in temporary accommodation disrupts education; families in houses suffer discrimination, harassment and social exclusion leading them to deny their ethnic identity, whilst the feeling of security on sites enables confident engagement in the wider community; health is at risk because of the above factors, with all research confirming the extreme disadvantage of Travellers in all aspects of life, none of which has been commented on in either the Mayor's draft Plan or the minor alteration. The decision by the GTAA steering group which was led by the Boroughs and the GLA, to use psychological aversion as the only measure of need, for housed Travellers, is one we would question in any future GTAA because it pathologises a culture and a way of life. Be that as it may, the GTAA steering group agreed on a method of measuring aversion which has given the figure of need for housed Travellers, which, with sited Travellers, gives the inclusive total in the GTAA.

It raises questions of bad intent, for the Mayor to deny the validity of the measure of need that the GLA and boroughs themselves chose. Now is not the time for the Boroughs and GLA to have second thoughts on their own methods some 2 years after the report has been signed off. It is even more perverse that the Mayor is suggesting that it is government guidance that puts this evidence in question.

Borough target distribution

Members of the LGTF were puzzled by what method the borough targets were arrived at. There appears to be no clear rational. In its previous submission LGTF has pointed out that the distribution of need had more to do with Borough policies towards Travellers than to where Travellers chose to live. Those boroughs who; through failure to build sites under their statutory duty; closure of sites without replacement and harsh eviction policies; have forced Travellers into bricks and mortar, and can now compound the disadvantage these Travellers have already suffered by denying their need. By linking future site provision purely with existing sites, the Mayor is 'rewarding' those boroughs for these poor practises and past non-provision. The LGTF has a particular knowledge and concern about the closure of the Lewisham site, which happened as recently as 2009 well after the GTAA had identified the need for more pitches, and happened without building the replacement site which had planning permission and 100% funding. To at least partially address this inequality, we re-iterate the view that the starting point for distribution is for each borough to have a minimum of 20 pitches. A borough partnership approach could be considered..

Transit sites and sites for Show people

The extreme reduction in targets for the above pitches has no basis in evidence. The targets should be based on the need identified in the GTAA. The reduction in these targets bear no relation to the 'no housed Travellers needs 'rational being used in the minor alteration. In fact the needs of Travellers on unauthorised sites who would use transit sites, are the most pressing, and the nature of Show peoples' business means that they must remain nomadic.

Urgency

The need for sites is urgent, there have been years of delay. The Mayor has said that he wants sites to built quickly-how will he ensure that boroughs start building sites now?

Conclusion

It is difficult not to come to the conclusion that the main intent of the minor alteration to paragraph 3.9 is but a continuation of the history of non-provision of sites for Traveller by most London boroughs, and demonstrates little attempt to either recognise or address the need, or redress the disadvantage of these very marginalised communities.

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