



Comments on

**The London Plan**  
consultation draft replacement  
GLA - October 2009

**Policy 3.9 Gypsies and Travellers**

**London Gypsy and Traveller Unit**

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**The London Gypsy and Traveller Unit** has been actively supporting Gypsies' and Travellers' involvement in the development of the London Plan through

- Building capacity for direct involvement, evidenced by some 50 individual letters of comment and other submissions,
- Administering and maintaining the London Gypsy and Traveller Forum, a GLA supported stakeholder organisation attended by Gypsies and Travellers,

The Unit is both a community development organisation and a regional strategic organisation. It seeks to support Travellers and Gypsies living in London, to have greater control over their lives; to influence decisions affecting their lives; to improve their quality of life and opportunities available to them; and to challenge the discrimination they routinely experience. It uses this detailed local and regional experience to contribute to national consultation and debate, and has done so over the past 29 years.

LGTU has wide experience of accommodation issues. It was actively engaged in fighting roadside evictions, negotiating tolerated sites and campaigning for official sites in North and East London throughout the 'eighties and early 'nineties during which time eight new sites were built.

When the Criminal Justice Act of 1994 repealed the duty to provide sites and increased eviction powers, roadside families were forced into housing and many boroughs began to close sites. LGTU fought these closures. It also started an advice service for housed travellers to respond to the loss of extended family support for these often very young families; the difficulties of coping with bricks and mortar living; and the hardships of temporary accommodation.

Since 2004, LGTU has been actively supporting residents in the development of the four 'Olympic replacement' sites, and has worked for the provision of new sites under the Housing Act.

Throughout, the Unit has continued to work with young Gypsies and Travellers on sites and in housing.



## Introduction

*“We think it is good to be London Travellers and part of the London culture which is becoming so well known”*

The London Gypsy and Traveller Unit is dismayed by Policy 3.9 of the draft London Plan and the explanatory paragraphs 3.47-3.51.

The London Plan should

1. give clear leadership to all stakeholders in working towards the early development of pitches, acknowledging that the need for pitches is “clear and immediate”. Boroughs should be urged to start site planning and development immediately, (amending supporting paragraphs and policy A)
2. adopt the inclusive pan-London target of 808<sup>1</sup> which incorporates the needs of housed Gypsies and Travellers as identified in the GTANA. (amending paras 3.48-9 and Table 3.4) The words “and reflect the priority to address needs arising from groups already living in caravans on sites” should be deleted. (amending Policy A.a)
3. promote the development of pitches within the Olympic Legacy and other large schemes, (amending supporting paragraphs)
4. urge that the next GTANA takes account of the lessons learned in this first round, especially improving enumeration accuracy, (amending supporting paragraphs)
5. advocate pan-London monitoring that is sufficiently rigorous to track complex changes in the provision of pitches against the targets set. (amending Policy A.b and supporting paragraphs)

These 5 points are taken up in the following sections.

LGTU is pleased that the GTANA’s recommendations for transit pitches are fully incorporated; that some account is taken of housing density in the distribution of pitch targets; that mention is made of monitoring in the policy itself.

This representation does not cover Roma or Travelling Showpeople.

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<sup>1</sup> This figure was changed from 811 at a very late stage when Fordhams made a correction to the figure for Ealing (GLA email, 8/1/10)

**1 give clear leadership to all stakeholders in working towards the early development of pitches, acknowledging that the need for pitches is “clear and immediate”. Boroughs should be urged to start site planning and development immediately.**

*“Waiting for these pitches to actually start being built is going to seem like forever”*

All too often, Boroughs are delaying preparation for implementation and delivery until after borough targets are finalised: LGTU is aware of plans for only 8 new public pitches<sup>2</sup> in London since the 2004 Housing Act<sup>3</sup>; a replacement site for another 5 pitches has been approved and funded but has sunk without trace; No net increase in private authorised sites over the last few years is indicated by the poor data that is available; A private site with permission for 25 pitches is standing empty and undeveloped.<sup>4</sup>

To add to this, 85 public pitches (13% of the total) have been closed since 1998.

Gypsies and Travellers have been waiting a long time. The need is clear and immediate.

The top priority for the London Plan system must be to give Boroughs a sense of this urgency in developing practical policies for early pitch provision. The plan fails to do this.

The London Plan should recognise and outline the

- 1.1 exclusion and hardship experienced by Gypsies and Travellers, also including them in para 1.24
- 1.2 net reduction in pitches over recent years, also including them in para 1.28
- 1.3 Government and HCA guidance that Boroughs act before the RSS is approved where the need is clear and immediate, urging Boroughs immediately to start site planning and development.

No uncertainty over Borough targets should delay planning and delivery of **some** pitches **now**.

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<sup>2</sup> This excludes the one-for-one replacement of the 35 pitches lost to the Olympic site, where LGTU supported the Gypsies and Travellers.

<sup>3</sup> This is the Act that first introduced the requirement for the assessment of the need for, and the delivery of, pitches for Gypsies and Travellers.

<sup>4</sup> See Appendix 2 for details.

## 1.1 Exclusion and hardship experienced by Gypsies and Travellers

*“Being forced to live in a way we don’t want to, and to suffer the racism that we have suffered is having a very bad effect on our community because people are mixed up , confused and scattered, but we are trying our best to hold on to our culture.”*

There is a substantial body of research literature [for example, see Cemlyn et al 2009 and CRE 2006] that gives evidence of the prejudice and poverty confronting Gypsy and Traveller communities:

- **"Discrimination** against Gypsies and Travellers appears to be the last 'respectable' form of racism.” [Phillips T 2004]
- As to **accommodation**: there are too few authorised sites, road-side camps are constantly moved on, access to social housing is difficult, private renting housing is temporary and poor quality.
- Participation in secondary **education** is extremely low: discrimination and abusive behaviour are frequently cited as reasons for children leaving education early.
- They have significantly poorer **health** than other minorities. Reported health problems are between two and five times more prevalent than the general population.
- **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.

Circular 1/2006 [ODPM 2006 para 12a] makes it clear that it is because of this that pitch targets are to be included in RSSs: to build “inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision.”

The Draft London Plan policy, in failing to recognise this, misses the point and provides only a weak platform for the development of local policy. The supporting paragraphs should be rewritten accordingly.

Gypsies and Travellers should be included, along with other minority groups, in the final sentence of para 1.24

## 1.2 Net reduction in pitches

*“My parents lived on the Enfield site for a long time when it closed they had to go into a house. It was very sad and hard for them away from the family after all that time.”*

The London Gypsy and Traveller Forum [2004] and LGTU have recorded the following closures:

Pitch closures	5	Lewisham	2009
	3	Camden	2004
	12	Haringey	2004
	10	Hillingdon	2004
	11	Lewisham	2003
	20	Harrow	2001
	15	Enfield	1999
	8	Hackney	1998
	<b>85</b>	<b>Total</b>	

This loss of dwelling stock compares with other types [ONS 2008 tables 6.1-2] as follows:

Gypsy and Traveller Pitches	-13%
Social housing [bricks and mortar]:	-5%
Owner Occupied housing:	+11%
Private rented:	+13%

Tolerated sites, a common-sense interim measure, are less and less common. Enforcement action against unauthorised sites (now none identified in 23 boroughs) has been increasing in recent years, driving Gypsies and Travellers unwillingly into housing.

The supporting paragraphs should make clear the importance of these closures as an ingredient in the clear and immediate need.

Para 1.28 should include a sentence to the effect that

“In the case of London’s Gypsies and Travellers there has been a significant reduction in authorised sites, impacting on the deprivation and exclusion they experience. The population is small, but is recognised as the most excluded community in the Capital; and London should be ready to confront the lack of authorised sites.”

Appendix 2 gives further data on pitch development and closures.

### **1.3 Government and HCA guidance that Boroughs act before the RSS is approved where the need is clear and immediate, urging Boroughs immediately to start site planning and development.**

*“If the Mayor wants Boroughs to build sites he has to be very strict and make sure they actually do it. This is important and the Councils have to start now as we’ve been homeless for a long time.”*

The Government consistently advises that boroughs should act quickly where there is clear and immediate need [ODPM 2006 para 43]<sup>5</sup>.

The first recommendation of the DCLG’s Independent Task Group on Site Provision and Enforcement for Gypsies and Travellers [DCLG 2007c] was

“All local planning authorities where there is demonstrable need for site provision – including those in regions where a Regional Spatial Strategy has not yet allocated pitch numbers to each local planning authority – should give serious consideration to proceeding with a Development Plan Document now.” (*underlining in original*)

The Housing and Communities Agency is now reinforcing this guidance:

“Some local authorities are waiting for the Regional Spatial Strategy pitch allocations before considering making more site provision – in many cases this is several years away. Where there is clear, unmet need .. local authorities should identify land .. and, where appropriate, apply for .. Grant to address those needs as soon as possible.” [HCA 2009]

A 2011 date for London Plan approval will be 4 years into the 2007-17 target period. Any local pitch planning that starts only then is unlikely to see pitches on the ground before 2015<sup>6</sup>. Given this, it is imperative that the London Plan advocates an immediate start to implementing pitch provision. In doing this, the supporting paragraphs should make the following points:

- Where there is land allocated with planning permission, this should be developed immediately, eg Church Grove, Lewisham and Chalk Pit, Bromley.
- Plans should be put in place for pitch development on the Olympic Legacy site immediately after the games in 2012.
- The GLA should take a lead in ensuring that London’s quota of HCA grants is fully taken up for new pitches.
- Studies to identify land for further sites should be brought forward, and planning for development begun as land is identified.
- Work to identify RSLs willing to develop and manage sites should be intensified.
- Boroughs should work together to share information and experience, for example in best practice procurement and value-for-money.

Uncertainty in targets, within the range presently being discussed, is no reason to postpone these practical steps.

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<sup>5</sup> In London, as in other major cities, this unmet need is clear in the numbers of Gypsies and Travellers moving, most often unwillingly, into housing because there are not enough pitches.

<sup>6</sup> The Church Grove site, Lewisham was on track to take 4 years from land search to occupation before it was put on hold.

- 2 Adopt the inclusive pan-London target of 808 which incorporates the needs of gypsies and travellers whether housed or in caravans as identified in the GTANA. The words “and reflect the priority to address needs arising from groups already living in caravans on sites” should be deleted.**

The Draft London Plan sets a pan-London target (2007-17) of 538 new pitches to respond to the needs of Gypsy and Traveller families. The breakdown and comparison with the GTANA figures is as follows

Needs of:	GTANA	comments	Draft London Plan
Families on sites	268	GTANA labels this the 'minimum'	268
Families in housing	540	Draft London Plan [para 3.49] accepts ½ the GTANA figure	270
Total	808	GTANA labels this the 'maximum'	538

LGTU disputes the argument of paragraph 3.48 in the draft Plan since the needs of housed families are substantially more serious and widespread than the draft Plan suggests. LGTU broadly accepts the figure for the needs of families on sites.

The London Plan should

- 2.1 incorporate a pan-London target of 808 new pitches (2007-17) since
  - a the needs of housed Gypsies and Travellers are real and underestimated, and
  - b there is no evidence of insufficient land
- 2.2 exclude the phrase “priority to address needs arising from groups already living in caravans on sites”

### **2.1a the needs of housed Gypsies and Travellers are real and underestimated**

*“I can’t stand living in a house its like being in a prison, it tears us apart. Your neighbours don’t want you there and we don’t want to be there”*

The London Plan target of 270 pitches in relation to the needs of housed families is significantly too low, because the GTANA figure of 540

1. takes a robust and warranted measure of psychological/cultural aversion,
2. neglects other types of need for pitches included in planning and housing guidance,
3. is based on an under-enumeration of housed Gypsies and Travellers (see section 4)

*Firstly*, the needs of housed Gypsies and Travellers are well documented and researched. The LGTU, through the advice and support that it has offered them since 1998, can confirm the alienation and deprivation that is suffered by many housed Gypsies and Travellers. Cemlyn et al ([2009] pp20-26) give a telling description of the problems experienced by housed Gypsies and Travellers.

The Government Office for London has consistently advised that the inclusive figure is the only tenable one [GOL 2009]. Government guidance recognises that this aversion to bricks and mortar is a source of real need for pitches [DCLG 2007a]. This is supported by UK and European case law [Fordham 2008 p94, CRE 2006 para 1.5] which requires that this aversion is fully taken into account when assessing accommodation needs.

*Second*, the London GTANA excludes important categories of officially recognised need. In stringently relating need only to psychological/cultural aversion it has taken a narrowly selective view of government guidance: Circular 1/2006 and DCLG guidance on RSS reviews [2007b] do not mention aversion, adopting the broader approach found, for example, in the Guidance on Housing Market Assessments [DCLG 2007d]. The DCLG guidance on GTANAs [2007a], in trying to be helpful, gives psychological aversion<sup>7</sup> as **one possible reason** that housing might be unsuitable. The extracts given in Appendix 1 make this clear.

The categories of need beyond psychological aversion given in the guidance but excluded from the GTANA (together with estimated pitch numbers) include:

230	Families in overcrowded housing [GTANA table 12.13] This category is specifically included in DCLG guidance [2007a para 15] assuming ½ go to pitches
??	Families in housing unsuitable for other reasons (GTANA gives no estimate) For categories see DCLG [2007d Table 5.1] (see Appendix 2). These include "Harassment from others living in the vicinity which cannot be resolved except through a move"
60	Households willing to buy pitches or rent them in the open market. The GTANA data indicates 16% of pitches are private at present. assuming this mix continues gives 125 new pitches, say ½ from housing.
290++	Housed families needing pitches in addition to the GTANA's count of 540.

So in finding that 540 housed Gypsy and Traveller families are in need of a pitch, the London GTANA is setting the level significantly below that indicated by government guidance.<sup>8</sup> The pan-London target should be increased, at least to 808.

Further still, the GTANA identified a further 923 families who aspire to live on a pitch. [derived from Fordham 2008 table 14.5]

<sup>7</sup> LGTU maintains that the obvious meaning of 'proven' in this context is that it is proven (eg in appeal cases) that psychological aversion can exist and make housing unsuitable, not that interviewers have to drag respondents through the eye of a needle before ticking the 'aversion' box.

<sup>8</sup> Data from other studies that deal with Gypsies' and Travellers' experiences of housing [eg Smith 2008, Barrett 2008] also give significantly higher figures than London's GTANA.

## 2.1b there is no evidence of insufficient land

Government guidance [DCLG 2007B p47] makes clear that any land considered, on general planning grounds, to be suitable for residential use should also be considered suitable for development as a Gypsy and Traveller site since sites are a form of residential development.

On the figures given in the London Plan, the following land allocations for residential use and pitches can be calculated:

Land use	Annual land take (ha)	% of housing land take
33,400 dwpa (see policy 3.3)	239.0	100%
808 pitches per 10 years	1.6	0.7%
538 pitches per 10 years	1.1	0.5%

LGTU disputes that the GLA or the Boroughs have sufficient data from land studies and searches to indicate that 1.6 ha/annum, or less than ¾% of housing land capacity, cannot be found for Gypsy and Traveller sites.

This is reinforced by the fate of London's Housing Capacity Study 2009 [GLA 2008b] where the identification of land for Gypsy and Traveller sites was excluded on the basis of comments by the Boroughs of Sutton, Hillingdon, Greenwich and the SE London Partnership. [GLA 2008c]

## 2.2 exclude the phrase “priority to address needs arising from groups already living in caravans on sites”

*“I think this is very unfair because we have been forced to go into houses where we don't want to be and now we are being told that we are not priority because we are not staying on a site.”*

If the points made in 2.1 above are accepted, this phrase has to be deleted from the policy A.a. But even if the London Plan target remains below 808, the phrase is perplexing. It will serve no purpose other than to confuse and should be deleted.

How can “site allocation criteria... reflect the priority to address needs arising from groups already living in caravans on sites”? One is hard pressed to see how the priority relates to site location or design; LGTU understands that the phrase is **not** included in order to indicate anything about the allocation of pitches to particular Gypsy and Travellers which would, anyway, be impossible to implement. The priority, rather, is already built in, being manifest in the lowering of the target by a proportion of the needs of housed Gypsies and Travellers.

**3 promote the development of pitches within the Olympic Legacy and other large schemes.**

*'We are happy to live near houses, that stands to reason in London'*

The Olympic Legacy site and the Thames Gateway regeneration schemes will provide a substantial proportion of London's new housing. Given the Government guidance on the suitability of residential land for Gypsy and Traveller sites, these initiatives should be promoted as a part of resolving the need for pitches.

The London Plan should

- 3.1 advocate the inclusion of pitches in major residential schemes particularly within the Olympic Legacy site
- 3.2 remind boroughs that Gypsy and Travellers sites should count as social housing provision in relation to s106 agreements.

**3.1 advocate the inclusion of pitches in major residential schemes particularly within the Olympic Legacy site**

*"if more sites were built alongside new housing developments then all the neighbours would know each other and we would all get in together."*

The provision of Gypsy and Traveller sites in residential areas is made significantly easier when they are planned and developed before or alongside the surrounding housing and properly designed within the overall scheme. The automatic consideration of Gypsy and Traveller accommodation for inclusion in large developments is an example of good practice in mainstreaming. Gypsies and Travellers themselves favour this.<sup>9</sup>

There is a large scale social housing programme included in the Draft Olympic Legacy Master Plan Framework, so the Legacy site will host exactly the kind of large scale developments on a blank canvass that allow the sustainable and inclusive development of Gypsy and Traveller sites to be mainstream from the start. Pitches here are especially appropriate in that 35 were moved to make way for the development of the Olympics.

The phasing of these major schemes gives the opportunity for temporary Gypsy and Traveller sites on idle land. LGTU supports this as long as these sites are built to acceptable standards and are integral to a long term strategy.

**3.2 remind boroughs that Gypsy and Travellers sites should count as social housing provision in relation to s106 agreements**

DCLG [2008a para 3.7] advises: "As one way of helping to address shortages of site provision local authorities and registered social landlords can consider the feasibility and scope for providing a site for Gypsies and Travellers within their negotiations to provide affordable housing as part of significant new build developments."

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<sup>9</sup> For example, discussion at the London Gypsy and Traveller Forum (22/1/09).

#### **4 Require that the next GTANA takes account of the lessons learnt nationally and regionally in this first round, improving enumeration accuracy.**

It is generally accepted that the first round of GTANAs was a rough stab at enumerating the Gypsy and Traveller communities. This is particularly so of the housed community. There are areas of London where there was significant under-enumeration which should be revisited in the next round. Enfield, for example, probably has a housed community 5 times that given in the GTANA.

The only mention of the effectiveness of the GTANA (in the last, rather difficult, sentence of para 3.49) suggests that it can be tested by the number of pitches built. LGTU disputes this.

The London Plan should urge that

- 4.1 the next GTANA re-enumerates housed Gypsies and Travellers
- 4.2 the next GTANA reworks the assumptions on inter-regional migration.
- 4.3 Boroughs set up robust waiting lists for pitches to provide data for the next GTANA

#### **4.1 the next GTANA re-enumerates housed Gypsies and Travellers**

*“Housed Travellers need to be included in your plan; so many are feeling very isolated and struggling to cope. It’s very important our children grow and understand their culture and the only way they will be able to this is by us living in a site with other Travellers.”*

Housed Gypsies and Travellers are difficult to identify. They often conceal their background for fear of abuse; they often move very frequently; and they often avoid contact with authority.

Paragraphs 3.6-3.11 of London’s GTANA show that it did not overcome these problems: Broadly speaking, the consultants acknowledge that in 13 boroughs the data on housed Gypsies and Travellers was too poor to use at all. Here, therefore, they applied a ratio of *pitches::housed families* of 1::3<sup>10</sup> in the 9 boroughs which had any pitches to be ratio’d; in 2 of the boroughs, which had no pitches, they took the number of interviews as estimate of the housed population; in the last two boroughs, again with no pitches, the GTANA implies that no interviews were conducted and no explanation for the estimate of the housed population is given.

It would clearly be unsatisfactory for further GTANAs to use this kind of guesstimation or data derived from the first GTANA.

<sup>10</sup> This ratio was derived from estimates of the *pitches::housed families* ratios in another 18 Boroughs. This distribution was essentially random, varying between 1::0.5 and 1::20, but with a mean of 1::3. But what else is one to do with such poor data?

Enfield and Bromley are two particular examples in Outer London that concern LGTU:

### **Enfield**

*“They closed the Enfield site without any consultation, they just let the empty pitches get trashed even though there were plenty wanting a pitch”*

Enfield is one of those Boroughs with no pitches, apparently no interviews and no explanation in the GTANA of the figures given for the housed population. The GTANA gives only 10 housed Gypsy and Traveller<sup>11</sup> families in the Borough.

Yet the LGTU has 11 Gypsy and Traveller families from Enfield attending for housing advice and certain knowledge of another 20. At least half of these families have grown-up children, raising the population of housed families in the Borough to some 50 or more. There is clearly a significant under-enumeration.

This is particularly important because Enfield is traditionally a “Gypsy Borough” whose only site was closed in 1999 and, with a low residential density, is suitable for new pitches. Yet the GTANA proposes that Enfield’s current Gypsies and Travellers have a need for only two new pitches: the lowest of any Borough outside Westminster and the City. The London Plan assigns it a target of only five: the lowest of any Outer London Borough.

A new start must be made here. It would be a travesty if the Enfield figure in the second GTANA is founded on the assumptions of the first.

### **Bromley**

The GTANA suggests that there are 1,000 housed Gypsy and Traveller families in the borough. The Bromley Gypsy Traveller Project, which has been supporting housed Gypsies and Travellers in the borough for many years, believes that this figure is out of date and should be in the region of 1,500, lifting the London target by some 5%.

## **4.2 the next GTANA reworks the assumptions on inter-regional migration**

The GTANA assumes that, of the families needing pitches, some will leave London for pitches elsewhere. Fordham [2008 pp98-156] give the following figures:

	2007-17	2007-12	2012-17
Gypsies and Travellers	120	89	31
Travelling Show-people	60	32	28

The GTANA assumes that all Gypsies and Travellers in need of pitches who say they wish to leave London will be able to, adding hopefully “This does assume that suitable accommodation is available outside London” [Fordham 2008 para 12.11].

The assumption is incompatible with neighbouring regions, who are not proposing pitches or yards for Londoners. The pitch target in the Plan for the East of England, one of the likely destinations, assumes that there will be no net migration. [GoEast 2008 para 2.29]. The same assumption appears to have been made, by default, in the South East. There are no sites for Londoners to go to.

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<sup>11</sup> Plus 15 Roma families.

#### 4.3 Boroughs set up robust waiting lists for pitches to provide data for the next GTANA

*“We have trouble with our local council trying to get our name on the list for pitches. They don’t have a list so we can never get a way in so they don’t know about us”*

The plan should advocate properly managed and advertised waiting lists for pitches as a crucial part of the GTANA methodology.

At present Gypsies and Travellers cannot register their needs in many boroughs nor is it clear if they can register on waiting lists of more than one borough. The differences between the boroughs’ schemes are a real barrier to effective access and measurement of need. In some Boroughs, it appears that the waiting lists that do exist are only made known to existing caravan dwellers with little or no attempt at informing housed Gypsies and Travellers. In some Boroughs the processes are informal. A survey conducted by LGTU indicates the following:<sup>12</sup>:

Number of boroughs	Pitch waiting list status
9	no council pitch provision <sup>13</sup> .
3	never had a waiting list or say they do not need one
7	no clear procedures or access, effectively run by the site residents
4	no clear procedures or access, council run
4	formal lists, not currently under revision/consultation
4	formal lists currently under revision/consultation
1	no response

It makes good sense for waiting lists to be dual purpose, informing pitch allocations as well as needs assessment. In this they can draw on good practice described by the CRE [2006:pp107-9, 118] and the DCLG [ODPM 2002].

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<sup>12</sup> Telephone and email survey conducted in March 2009:

<sup>13</sup> 6 recognised by GTANA as having no pitches PLUS Harrow (now 0), Lewisham (now 0) and Havering (all private).

**5 advocate pan-London monitoring that is sufficiently rigorous to track complex changes in the provision of pitches against the targets set.**

LGTU is pleased that the policy itself mentions monitoring and that it is linked to policy review in para 3.49 although the sentence is opaque:

“Performance against this benchmark<sup>14</sup> will be monitored against achievement of borough targets ... to test the effectiveness of the GTAA in identifying need and to inform a review of policy”

Given the difficulty of monitoring in this policy area, the supporting paragraphs should say more. There should be a call for a consistent pan-London system for clarifying current authorised pitch provision (the policy base-line) and monitoring changes.

Allocating targets in a strategy as contested as Gypsy and Traveller accommodation clearly needs adequate monitoring. It seems likely that existing data sources will be inadequate. Our main concerns are

- non-reporting of voids as sites are run down
- under-occupation of pitches
- sites being given planning permission but not being developed
- expiry of temporary (fixed term or lifetime) permissions
- continuing confusion between caravans (in planning permissions and appeals) and pitches (in plan targets)
- the widespread use of personalised/nominated permissions

Figures for the number of pitches, even existing authorised ones, are notoriously unreliable [Brown & Niner 2009 p62]. Temporary permissions are a particular concern. Nearly all private sites in London operate on temporary and personalised permissions. The CLG Planning Applications Statistics, which now report separately on Gypsy and Traveller sites, do not give the duration of the permission. Again, keeping track of the pitches that are being lost through closure, refurbishment or poor management requires perseverance.

The new Core Output Indicator H4 *Net additional Gypsy and Travellers pitches* will help, but it looks to the caravan count and the GTANA for its data [DCLG 2008b]. The Caravan Count is flawed [ODPM 2003]; the GTANA is not annual and its base data on authorised pitches contains some errors; and they currently disagree significantly in the case of 5 boroughs, which are likely to have some private sites.

The GLA has joint responsibility with the boroughs for this new indicator and should use this role to work for consistent and good practice.

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<sup>14</sup> previously in the paragraph the target is referred to as ‘the benchmark’.

## Appendix 1 Guidance on need and the London GTANA

### DCLG 2007a. *Gypsy and Traveller Accommodation Needs Assessments – Guidance*

What is ‘accommodation need’ for Gypsies and Travellers?

14. In Planning Policy Statement 3, housing need is defined as ‘the quantity of housing required for households who are unable to access suitable housing without financial assistance’ and housing demand ‘the quantity of housing that households are willing and able to buy or rent’.
15. In many cases, this definition will also be appropriate for Gypsies and Travellers, particularly those living in bricks and mortar housing. However, the distinctive accommodation requirements of some Gypsies and Travellers will give rise to similar types of need, but in a different context, for example:

Caravan dwelling households:

- who have no authorised site anywhere on which to reside;
- whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation;
- who contain suppressed households who are unable to set up separate family units and who are unable to access a place on an authorised site, or obtain or afford land to develop one.

Bricks and mortar dwelling households:

- whose existing accommodation is **overcrowded** or **unsuitable** (‘unsuitable’ in this context can include unsuitability by virtue of proven psychological aversion to bricks and mortar accommodation).

16. It should also be recognised that the shortage of sites and local hostility, as well as lack of income, may prevent Gypsies and Travellers exercising their free choice in the accommodation market – and that there may in fact be no ‘local accommodation market’ in sites.

### DCLG 2007d, *Strategic Housing Market Assessments Practice Guidance: Version 2*

“The types of housing that should be considered **unsuitable** are listed in Table 5.1 below

Homeless households or insecure tenure	Homeless households
	Households with tenure under notice, real threat of notice or lease coming to an end; housing that is too expensive for households in receipt of housing benefit or in arrears due to expense
Mismatch of housing need and dwellings	Overcrowded according to the ‘bedroom standard’
	Too difficult to maintain (eg too large) even with equity release
	Couples, people with children and single adults over 25 sharing a kitchen, bathroom or WC with another household
	Households containing people with mobility impairment or other specific needs living in unsuitable dwelling (eg accessed via steps), which cannot be made suitable in-situ
Dwelling amenities and condition	Lacks a bathroom, kitchen or inside WC and household does not have the resources to make fit (eg through equity release or grants)
	Subject to major disrepair or unfitness and household does not have the resources to make fit (eg through equity release or grants)
Social needs	Harassment from others living in the vicinity which cannot be resolved except through a move

## London GTNAA methodology

### Identification of households needing a pitch due to psychological aversion

Households considered to need a pitch must:

State a negative psychological effect of living in bricks and mortar accommodation

AND State they are dissatisfied or very dissatisfied with their current home

Households **not** considered to need a pitch:

State they only live in a house due to a lack of available pitches AND

do not additionally mention negative psychological effects

AND / OR are in **overcrowded** or **unsuitable** bricks and mortar accommodation

AND / OR state they would ideally like to live on a site

AND / OR are satisfied, very satisfied, or are neither satisfied nor dissatisfied with their home

The following paragraphs indicate the lengths the consultants went to be conservative in this regard.

“12.24 It is worth stating that a further 762 families were identified as having a psychological aversion to housing but did not say they were dissatisfied with their current accommodation. Given that ‘proven’ psychological aversion implies a high level of confidence that the aversion is detrimental to their living standards, these participants were not therefore counted as having a need for a pitch.

12.25 ..... A lack of suitable alternative accommodation may be one reason why many participants did not say they were dissatisfied with their current home yet elsewhere demonstrated a psychological aversion to living in a house.” (Fordham 2008)

## Appendix 2 Pitch provision and closure

### Planning approval for pitches year ended 31<sup>st</sup> March 2009

The recent Government publication of a new set of statistics on planning application for Gypsy and Traveller sites [DCLG 2009] reports that 3 applications in London were approved last year. This appears to be good news:

Major applications (10 or more pitches)	Kingston-upon-Thames Southwark
Minor applications (less than 10 pitches)	Lewisham

But, in reality, these permissions will lead to only 3 new pitches (or maybe minus 4)

Kingston-upon-Thames: (net gain = 3)

Application (ref 08/10201) approved for reconfiguration of the Swallow Park site with 3 extra pitches (from 15 to 18 pitches in total) and some refurbishment. This is coded as a major application because it affects a total of 18 pitches.

Southwark: (net gain = 0)

Application (ref 08/CO/0102) approved for refurbishment of Burnhill Close site, with no change in pitch numbers from 6. This is a miscoding – it should be a minor application.

Lewisham: (net gain = 0 or -4)

Application (refs DC/07/67610 & DC/07/67610A) approved for development of Church Grove site with 5 new pitches. But this scheme has now been put on ice pending *another* borough survey of suitable sites, the fourth [NLP 2007] in recent years.

Indeed, since this development was designed as a necessary replacement for a site needed for regeneration<sup>15</sup> whose last four pitches were being closed just as the approval was granted, it can be claimed that this permission was instrumental in a net loss of 4 pitches.

### Other proposals for new pitches

3	Star Lane, Bromley [Bromley 2009]
2	Old Maidstone Road, Bromley [Bromley 2009]
5	<b>Total</b>

### New public pitches: ready but stalled

5	Church Grove, Lewisham [Lewisham 2007]
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### Private pitches undeveloped

25	Chalk Pit, Bromley [Bromley 2003]
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<sup>15</sup> The GLA report [Oct 2007] on the regeneration states: “*alternative appropriate provision for the travellers is a prerequisite for redevelopment of the main Lewisham Gateway site..... Mechanisms to enable appropriate alternative provision are therefore in place.*”

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