



Gypsy and Traveller accommodation in London a strategic view

London Gypsy and Traveller Unit

April 2009

London Gypsy and Traveller Unit

6 Westgate Street
London E8 3RN

www.lgtu.org.uk
info@lgtu.org.uk

Tel 020 8533 2002
Fax 020 8533 7110

Table of contents

Introduction	1
Delay and exclusion: the Land Availability Study 2009	
1 Summary	3
2 Equality for Gypsies and Travellers	
2.1 Policy commitment	4
2.2 Mainstreaming	5
3 Encouraging early pitch development	
3.1 Clear and immediate need	6
3.2 Temporary sites	7
4 The need for pitches – an inclusive figure	
4.1 Housed travellers	8
4.2 London’s total need	9
conjectural schemes	
no out- migration	
4.3 Monitoring	11
4.4 Waiting lists	12
4.5 London’s gypsy and Traveller population	13
5 Draft Housing Strategy	
Proposed amendments	14
6 A transparent distribution of borough targets	
6.1 Residential Pitches	16
6.2 Show-people’s yards	18
6.3 Transit sites	18
6.4 Major development opportunities	19
7 Draft Distribution methodology	
7.1 Distributing London’s total need for pitches	20
7.2 Opportunities and constraints	21
References	22

Introduction

The Greater London Authority [GLA] has recently produced two consultation documents important to the development of pitches for Gypsies and Travellers:

- *Consultation Draft London Housing Strategy* (GLA 2008a)
- *Stakeholder consultation on the methodology for distributing targets new pitches across the boroughs* (GLA 2009) [the Draft Distribution Methodology]

The responses to these two by the London Gypsy and Traveller Unit were based on a set of principles about the provision of pitches in London. This paper brings together these principles and extracts of the responses themselves. It is also intended as a contribution to the debate on the forthcoming Supplementary Planning Guidance on Housing [circa mid 2009] and the new London Plan [2011].

The paper starts with a reminder of the delay and exclusion that besets planning for Gypsies and Travellers.

The paper makes a number of proposals for GLA policy. These are indicated thus
➔ policy proposal

Our thanks to Stephen Staines of Friends, Families and Travellers and to Ray Smith of the Showmen's Guild for their comments on this paper. Our thanks also to those Gypsies and Travellers, the London Gypsy and Traveller Forum and others experienced in the field who have given their advice.

This paper was prepared by Bernard Bourdillon for the LGTU and with the help of its staff.

The London Gypsy and Traveller 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 20 years. It works directly with Gypsies and Travellers living on official sites, unauthorised sites and in housing.

Exclusion and delay: the Land Availability Study 2009

During 2008 the GLA consulted stakeholders on the methodology for the study of *London's Housing Capacity 2009* (GLA 2008b). The way that Gypsy and Traveller needs were withdrawn from the study illustrates the delay and exclusion that has dogged site provision over the years. The story is told here as a salutary reminder.

The Capacity Study is identifying land that is potentially available for new residential development in London over the next 20 years. It was timely to feed into the policy of identifying the opportunities and constraints for providing new pitches. The draft methodology paper, which was circulated to boroughs and other stakeholders with responses due in by August 2008, proposed that the study include land for sites

“in order to assist in addressing the requirements ofCircular 1/2006, the London Plan and to mainstream Gypsy and Traveller Issues, sites particularly suitable for Gypsy and Traveller pitches or Travelling Showpersons' yards.... This ... will assist in enabling identification of potential sites to accommodate the need set out in the boroughs' London-wide Gypsy and Traveller Accommodation Assessment (GTAA) and allow for testing of results.” (GLA 2008b para 49)

Stakeholders were asked to comment on “Identifying potential ...to provide for gypsy and traveller accommodation.....”¹

But, after the consultation, any consideration of Gypsy and Traveller accommodation was removed from the methodology and is to be left to a separate, later, exercise. The comments and follow-up (GLA 2008c) were:

Respondent	Comment	GLA Comment	Follow-up
LB Sutton	GT Sites best identified at borough level	Response noted and agreed.	Remove from methodology
LB Hillingdon	Should not be progressed until policy direction agreed with Mayor.	Response noted and agreed.	Remove from Methodology
LB Greenwich	Identifying GT sites outside SHLAA methodology, add significantly to time taken for study and additional requirements. Should be part of stand alone study	Response noted and agreed.	Remove from methodology
London Met University	Definition of site suitability required and will need to meet different targets recognising suboptimal densities.	Noted	
London Forum	Good opportunity to assess scope for providing accommodation.	Noted	
Shelter	Welcome identification of sites. GLA should encourage boroughs to identify such sites.	Noted	
LDA	Welcome - working to assist funding of sites and site information would be beneficial.	Noted	
SE London Hsg Part ²	Should not include G&T in methodology.	Response noted and agreed.	Remove from methodology

In the absence of this, and to allow pitch development to go ahead as soon as possible,

➔ The GLA should require that Boroughs consider the potential of any land, identified for housing development, for the provision of a Gypsy and Traveller site.

¹ Technically the question related to large sites (>0.5ha). But this appears to have been irrelevant to both the comments and the follow-up.

² This Partnership is led by the Boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark.

1 Summary

The Housing Act 2004 and the circular *Planning for Gypsy and Caravan Sites* (ODPM 2006) required that boroughs conduct Gypsy and Traveller Accommodation Assessments (GTAA) and allocate land for the pitches that are needed to catch up with the many years of under-provision. Indeed in London the number of pitches has fallen over the last 15 years. The boroughs combined to commission a London-wide assessment which reported in March 2008.

The GLA and boroughs are now planning how to implement the assessments findings and deliver pitches. LGTU identifies a set of core, or strategic, issues in relation to this. The paper considers each of these, drawing out broad proposals to strengthen the GLA strategy for developing Gypsy and Traveller pitches:

- **Equality for Gypsies and Travellers**

Gypsies and Travellers suffer profound inequalities in the planning and housing systems. The GLA and boroughs need to mainstream Gypsy and Traveller matters in their policies. GLA policy must go beyond the apparent neutrality that too often serves to reinforce marginalisation.

- **Encouraging early pitch development**

In order to encourage early pitch development, the GLA must accept that there is an immediate need and exercise the political leadership to bring the boroughs with it. It should support the appropriate use of temporary sites.

- **The need for pitches – an inclusive figure**

The GLA must support an inclusive figure for the needs of Gypsies, Travellers and Show-people, continuing to recognise that many housed Gypsies and Travellers desperately need pitches. The migration assumption in the assessment requires challenging and the number and development of pitches must be monitored – there are still pitches being closed. Properly run waiting lists are needed so that new pitches are allocated fairly.

Response to the Draft Housing Strategy

The points made in the previous sections are brought together into a response to the GLA's draft Housing Strategy

- **A transparent distribution of borough targets**

It is the task of the GLA to lead on setting targets for the individual boroughs. This needs to employ a transparent method that is based on equity and locational need, and recognizes the opportunities of the Olympic legacy and the Thames Gateway.

Response to the draft Distribution Methodology

2 Equality for Gypsies and Travellers

2.1 Policy commitment

- GLA policies should include a clear commitment to London's Gypsies and Travellers and to resolving their needs.

At present this is not the case in the housing strategy:

In terms of political ownership, for example, there are the two consecutive statements:

- 1,250 new supported homes will be provided over the next three years, to meet the needs of older and vulnerable Londoners.
- The government's accommodation requirements for Gypsies and Travellers will be provided for.

These clearly imply both that the policy for Gypsies and Travellers belongs to the Government, not the GLA and that the Gypsies and Travellers don't belong to London.

Should the second not read?

- *718 residential pitches and 80 Yards will be provided by 2012 to meet the clear and immediate need of London's Gypsies, Travellers and Show-people.*

"In 2006 the Commission for Racial Equality concluded that Gypsies and Irish Travellers are the most excluded groups in Britain today". (Brown & Niner 2009 p. iv)

GLA policies should aim for best practice under the Race Relations [Amendment] Act 2000 in paying due regard to the need to eliminate unlawful racial discrimination and to promote equality of opportunity and good relations between different racial groups.

The 2009 review conducted by the Equalities and Human Rights Commission shows that, on balance, there is still exclusion and inequality within the planning and housing systems with regard to Gypsies and Travellers. Brown and Niner (2009) give some measure of the important effect of this barrier to policy.

Among the general public, a Mori poll has recently found that over 30% of people are personally prejudiced against Gypsies and Travellers (Briscoe 2007). Planning consultation is all too often hijacked and the process of pitch development slowed.

All housing and planning policies that have relevance to Gypsy and Traveller accommodation should demonstrate a clear intention to respond to their needs if this ethical deficit is to be reduced.

When considering a group as excluded as Gypsies and Travellers, good practice to counteract prejudice must go further than simply promoting "race neutral" policies. This is quite compatible with the 'professional impartiality' required in housing and planning policy. The Equalities and Human Rights Commission (CRE 2006 Ch5) gives guidance on good practice [and illustrates regrettably bad practice] for planning in this regard.

2.2 Mainstreaming

Time and again, the need for mainstreaming is stressed. For Gypsies and Travellers, it includes

- Embedding Gypsy and Traveller issues in planning policy.

In land capacity studies, the London Plan and Planning Guidance.

The Planning Inspectors' recommends, on the East of England regional plan review (GoEast 2008 para 7.41), that "Gypsy and Traveller provision where possible should be made as part of mainstream residential development, contributing to any local requirement for affordable housing provision."

- Site identification.

A role for boroughs in the next phase of policy development.

DCLG (2008a para 3.6) advises "Sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply."

- A part of social housing provision, not in competition with it

In the Housing Strategy and London Plan.

The Homes and Communities Agency (2009 s5) funding strategy aims "to increase the pace of delivery significantly by embedding site provision for these groups in the context of overall housing accommodation delivery"

The South West Region sets a good example in their plan: "Provision for Gypsies and Travellers and Travelling Show-people is part of housing and affordable housing provision provided for by the RSS. These figures are .. about 1% [adjusted for London] of affordable housing provision." (GoSW 2008:para 4.1.95)

3 Encouraging early pitch development

3.1 Clear and immediate need

- GLA policies should state that the need for pitches is clear and immediate and that boroughs should begin to respond now, not waiting for the London plan of 2011.

Such policy leadership is the necessary framework for timely implementation. It will help to give a climate of certainty to the planning and negotiations of boroughs, housing associations, the HCA and others.

The boroughs' targets for providing new pitches will be set formally in the new London Plan of 2011. Given the various barriers to provision (Brown and Niner. 2009), some boroughs will wish to delay positive action till then. However, a response is needed immediately; it is encouraged by Government guidelines and should be supported by the GLA.

The GTAA reveals a need that is clear and immediate: isolated housed Gypsies and Travellers, those being moved on and overcrowded pitches. On top of this:

- The number of authorised pitches in London has been reduced over the last decade significantly more than other dwelling types. The London Gypsy and Traveller Forum estimate that 80 pitches [12%] have been closed since 1994 (LGTF 2004). This loss of dwelling stock compares with other types (ONS 2008 tables 6.1-2) as follows:

Gypsy and Traveller Pitches	-12%
Social housing [bricks and mortar]:	-5%
Owner Occupied housing:	+11%
Private rented:	+13%
- Unlike these other types of accommodation, no authorised Gypsy and Travellers sites have been developed since 1997 (DCLG 2008b) apart from the Olympic site and Cross-rail relocations.
- Over recent years there has been successful enforcement action against unauthorised sites (now none identified in 23 boroughs) driving Gypsies and Travellers unwillingly into housing.

Brown and Niner (2009) estimate that “it will take almost 20 years to meet the first five year pitch requirements if the rate of progress achieved since 2006 is maintained and not increased.” In London the next planning phase is the production of targets in the London Plan due in 2011; some five year since the GTAA was commissioned.

However, the Government consistently advises that boroughs should act in advance of the regional plan policy, in this case the London Plan review of 2011, where there is clear and immediate need (ODPM 2006 para 43). 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)

It is therefore important that all relevant GLA policy create a climate in which boroughs can act before 2011 when the new London Plan is published.

3.2 Temporary sites

➔ The GLA should support the appropriate use of temporary sites

Gypsies and Travellers living on unauthorised sites highlight temporary sites as a faster and acceptable way of responding to their immediate needs. These could last from 1 year upwards depending on the plans for the land. While not ideal, official temporary pitches with basic facilities of hard standing, chemical toilets and a stand-pipe tap have helped some Gypsies and Travellers escape being constantly moved on. This is a minimum and longer term temporary sites should be built to high standards drawing on good practice in design (DCLG 2008a). They should be planned and managed so as to avoid the longer term problems that concern Brown and Niner (2009).

There are particular opportunities for temporary sites related to major growth and regeneration areas such as the Olympic site and the Thames Gateway.

4 The need for pitches - an inclusive figure

4.1 Housed travellers

➔ The GLA should continue its support for the 'maximum', inclusive measure of need.

The GTAA gives a 'maximum' and 'minimum' figure for the need for pitches. The use of the maximum as the inclusive measure for overall London need in the Housing Strategy is welcome. This support should be continued and strengthened. The 'minimum' is an incomplete figure that excludes the needs of those in housing: 84% of London's identified Gypsies and Travellers.

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. A recent review by the Equalities and Human Rights Commission (Cemlyyn C et al 2009) reported the same.

The problems for housed Gypsies and Travellers are often now exacerbated by the increasing problems for private tenants generally. Rents are always unaffordable for low income households; the limited security, typically only six months at a time, makes secure family life extremely difficult; a significant proportion of the accommodation is not of decent standard; and there are high levels of overcrowding.

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 taken into account when assessing accommodation needs.

It will never be simple to prove psychological aversion, but the London GTAA has used a more stringent test [see the box below] than other assessments.

The method finds that 16.4% of housed gypsy and traveller families are in need of a pitch.

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 However it is clear *demand* for sites from those living in housing is therefore significantly higher than our assessment of *need* [see Table 14.5 for a comparison]. Certainly it is clear from the survey data that many Gypsies and Travellers living in bricks and mortar accommodation retain a keen desire both on behalf of current adults and their children to resume their traditional way of life on sites. 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)

4.2 London’s total need

→ the GLA should use figures, for London need by 2012, of

718	Residential pitches
40	Transit pitches
80	Show-people’s yards

The table below outlines the full calculation for the various figures used.

Need for pitches and yards: London	inclusive figures “Maximum”		
	total 2007-17	2007-12	2012-17
Fordham headline total	703	554	149
rounding adjustment	8	2	6
Bexley	57	46	11
London Hsg Strategy headline	768	602	166
① Add offset due to conjectural schemes	27	27	
Pitches per GTAA assumptions	795	629	166
② Zero net migration assumption	120	89	31
Total residential pitches	915	718	197
transit pitches	40	40	
Total pitches	955	758	197
YARDS			
Show-people’s yards per GTAA assumptions	73	48	25
② Zero net migration assumption	60	32	28
Total yards	133	80	53

① ② These issues are taken up below

Conjectural schemes

- The GLA should ensure that the conjectural schemes for 27 pitches in Havering, Kingston and Waltham Forest (less Lewisham) are on track to take place before 2012 **or** propose an increase of 27 in London's need for pitches.

The London target reported in the GTAA has been reduced because 4 boroughs reported in 2007 that they had plans for 27 net new pitches over the next five years (Fordham 2008 (step 6), para 12.13, pp130, 137, 139, 147). If any of these schemes does not go ahead, the London needs figure has to be re-adjusted: The GTAA says of the figures for Waltham Forest "The council-owned site at Waltham Forest was due to be expanded in 2007..... If the expansion does not take place, the need figures would consequently rise by the same amount" (Fordham 2008 p147).

pitches	Future development plans reported in the GTAA	Additional pitch [max] requirement 2007-2017	
		headlined in the GTAA	based on 2007 provision
Havering	16	23	39
Kingston	9	16	25
Waltham Forest	5	8	13
Lewisham	-3	19	16
Total	27		

The first three boroughs appear to be ignorant of, or disagree with, their reported development plans [LGTU telephone survey]. It seems unlikely that any will proceed. The uncertainty surrounding these developments is an example of the need for a robust monitoring system.

No out-migration

- The GLA should challenge the implausible assumption that Gypsies and Travellers will go to authorised sites outside London that no-one is building.

The assumption is incompatible with neighbouring regions, who are not proposing pitches or yards for Londoners. Self sufficiency in pitches and yards should be planned.

The figures for assumed net out-migration in the GTAA are (Fordham 2008 pp98-156):

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

The GTAA assumes that all Gypsies and Travellers that say they wish to leave London will be able to although it accepts that "This does assume that suitable accommodation is available outside London" (Fordham 2008 para 12.11).

But pitches will not be developed for these people in neighbouring regions. The East of England Regional Plan target for pitches in that region assumes that there will be no net migration. (GoEast 2008 para 2.29)

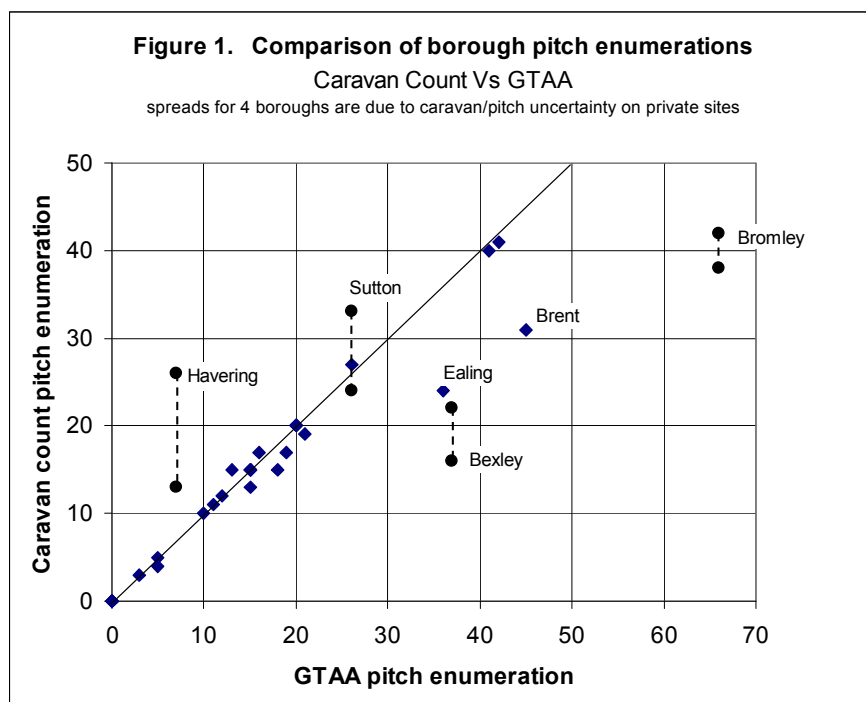
In relation to Show-peoples yards, Ray Smith of the Showmen's Guild reports: "There are also overcrowded yards just outside London, for instance in Thurrock to the East and Hoddesdon to the north, where London Showpeople were moved out of their homes over the years and forced outside the GLA boundary." (email)

4.3 Monitoring

- ➔ The GLA should develop a robust pan-London scheme for monitoring the number, development, approval and closure of pitches.

Allocating targets in a strategy as contested as Gypsy and Traveller accommodation clearly has more meaning the better the monitoring.

Figures for the number of pitches, even existing authorised ones, are notoriously unreliable (Brown & Niner 2009 p62). The new Core Output Indicator H4 *Net additional Gypsy and Travellers pitches* will help, but it looks to the caravan count and the GTAA for its data (DCLG 2008c). The Caravan Count is flawed (ODPM 2003); the GTAA is not annual and its base data on authorised pitches contains some errors; and they currently disagree significantly in the case of 5 boroughs [figure 1].



It is also surprisingly difficult to monitor new developments. As an example of this lack of transparency LGTU understands that the 07/08 HCA grant of £328,500 to Lewisham for developing the former Watergate School site is the only one made during 06-09 for site development in London (DCLG undated). But it has not been possible to obtain any information on the progress of this development. The way in which the proposals for 27 pitches, now contested, have been built into policy is another example of opacity.

Again, keeping track of the pitches that are being lost through closure, refurbishment or poor management requires perseverance.

The GLA has joint responsibility with the boroughs for the new indicator. It should lead on the development of a pan-London system for clarifying current authorised pitch provision (the policy base-line) and monitoring changes.

4.4 Waiting lists

→ The GLA should call on boroughs to implement schemes for allocating pitches. It should monitor these schemes and advocate consistency across London.

The development of pitches across London will require the parallel development of allocation schemes and waiting lists with criteria that do not prevent gypsies and travellers from registering their need. All allocations to new sites should be covered by formal, transparent schemes with a reasonable timetable for extending the policies to existing sites (CRE 2006:p118). The design and management of these schemes can draw on the good practice described by the CRE (2006:pp107-9) and the DCLG (ODPM 2002).

The present situation is confusing and points up informal processes operating in many boroughs³:

Number of boroughs	Allocations scheme status
9	no socially provided pitches ⁴ .
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

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. Consistency across boroughs would facilitate a fair allocation of pitches and transparent procedures.

This situation, and its difference from housing waiting lists, is clearly an equality issue.

³ Telephone survey conducted by LGTU in March 2009:

⁴ 6 recognised by GTAA as having no pitches PLUS Harrow (now 0), Lewisham (now 0) and Havering (all private).

4.5 London's gypsy and Traveller population

There are 17,100 Gypsies and Travellers according to the GTAA data. The GTAA's own headline figure of 13,537 is a 20% under-calculation.⁵

Many studies, including the GTAA, conclude that the population of Gypsies and Travellers is higher than enumerations indicate. There is particular difficulty with identifying housed travellers.

Fordham Research had to upwardly revise the figures provided by the boroughs and recognised that "Even with these revisions, there remains a lack of reliable data on Gypsy and Traveller numbers which cannot be overcome through accommodation needs research. We would therefore expect that the estimate of 13,537 Gypsies and Travellers living in London is a conservative figure." (Fordham 2008 s1.13 p35)

⁵ This is derived from a corrected version of para 3.12 [p34] of Fordham (2008) - the wrong figure is extracted from table 3.6 - plus the population in Bexley (Fordham 2008 appendix 10).

5 Draft Housing Strategy

The proposed amendments reflect the core issues of

- Equality for Gypsies and Travellers
- Encouraging early pitch development
- The need for pitches – an inclusive figure

Here they are set out within the structure of numbering, headings and subheadings of the draft Strategy.

1.3 Improving the social rented sector

Vision

To provide many more affordable rented homes and ensure that social renting provides an opportunity to foster aspirations and gives support to those who need it.

From vision to policy

1.3b Providing for all

Replace

- The government's accommodation requirements for Gypsies and Travellers will be provided for.

With

- *718 residential pitches and 80 Yards will be provided by 2012 to meet the clear and immediate need of London's Gypsies, Travellers and Show-people. Well planned temporary sites are encouraged.*

After

Disabled people should be able to participate in choice based lettings schemes on an equal basis to other social housing applicants

Add

Authorities' housing allocation schemes should fully incorporate gypsy and traveller pitches.

From policy to action

The Mayor will work with the HCA, London boroughs and other partners to:

Replace

- encourage boroughs to protect existing Gypsy and Traveller pitches, refurbish existing sites where needed, and address the identified requirements for the provision of new sites [note: this policy is in line with the Government's Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites 2006]

With

- *respond as soon as possible to the need for Gypsy and Traveller pitches and show-peoples yards, meeting the 2012 target by developing new sites and protecting existing ones. Boroughs should consider the potential of any land identified for housing development for this purpose. Sub-standard sites will be refurbished.*

Why we need change

Increasing specialist provision

Replace

The health, education and employment prospects of Gypsies and Travellers have historically been very poor in London, due in part to an inadequate supply of suitable accommodation. At the last count, in July 2007, there were 806 Gypsy and Traveller caravans on sites in London. Of these, 80 per cent were on authorised socially rented sites, five per cent were on privately owned sites and the remainder were on unauthorised sites. The 2008 London Gypsy and Traveller Accommodation Needs Assessment, produced by the London boroughs with the co-operation of the GLA, demonstrates the need for a total of 768 new residential pitches over the next ten years, almost doubling the current supply (Appendix 1 includes a borough breakdown). Much of this need arises from Gypsies and Travellers currently housed in unsuitable or poor quality accommodation.

With

Gypsies and Travellers are the most excluded minority group in Britain. Their health, education and employment prospects are poor, due largely to an inadequate supply of suitable accommodation and limited access to services. No new sites have been built in London since 1996 and some sites have been lost. Overcrowding on council sites, evictions from their own land and lack of safe stopping places has forced Travellers into private or social rented accommodation where they become isolated and routinely face discrimination and harassment. As a result many move around the system looking for other accommodation or take to the road. The Accommodation Needs Assessment found that 53% of those living on unauthorised camps had lived in bricks and mortar at some point and of these, 84% stated they would not want to live in a house again.

3.3 Investing to deliver

Gypsy and Traveller Site Grant

Replace

This funding is available to London boroughs and housing associations wishing to provide new Gypsy and Traveller pitches or sites, or undertake the refurbishment of existing sites, for these communities.

With

There is 100% funding available to London boroughs and housing associations for developing Gypsy and Traveller sites and 50% for refurbishments. Given the urgency for action, the Homes and Communities Agency encourages local authorities to apply for grant as soon as possible.

6 A transparent distribution of borough targets

In order to decide the final borough targets for new pitches the total need for pitches in London must first be distributed over boroughs based on “where it is best met”. This gives preliminary pitch targets. Later in the process the boroughs’ land capacity to meet these preliminary targets will be assessed in order to decide the final targets. This land capacity is determined by a set of criteria – opportunities and constraints – which should reflect the points made in the sections above. This is taken further in section 7 below.

Here we discuss the initial distribution.

6.1 Residential pitches

→ The GLA should distribute the need for pitches to “where it is best met” using the criteria⁶

- ⇒ equity (between boroughs)
- ⇒ choice (a range of broad locations)
- ⇒ staying put

Steve Staines of Families, Friends and Travellers puts it like this:

“There is an argument that allocations should be proportional to the overall housing capacities of boroughs. However against this there is an argument that all boroughs should make a contribution and that the current concentration of sites in certain borough should be broadly continued to help maintain family and social links for the Gypsy and Traveller community.”

Equity

Figure 2 shows that the existing provision of pitches is very unevenly distributed across boroughs. Equity between boroughs calls for each to make a contribution to addressing the needs of Gypsies and Travellers. This should be addressed by allocating a certain number of new pitches to each borough, or bringing each borough up to a minimum provision. LGTU proposes the second method.

More difficult is a policy that recognises the pitch closures over recent years. This issue is important to Gypsies and Travellers some having been evicted. The London Gypsy and Traveller Forum (2004) and LGTU have recorded the following closures:

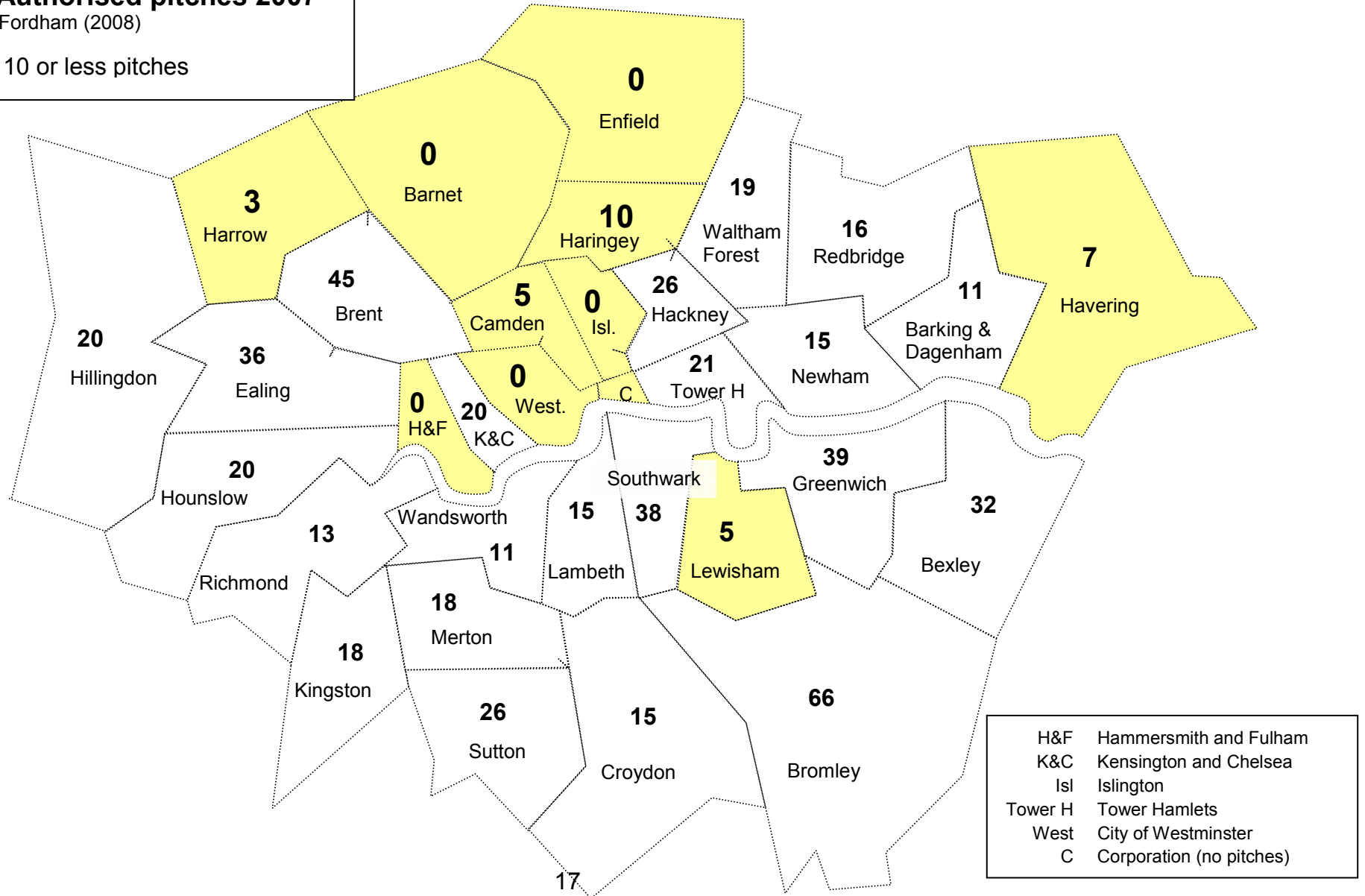
Pitch closures	5	Lewisham	2009
	3	Camden	2004
	12	Haringey	2004
	10	Hillingdon	2004
	11	Lewisham	2003
	20	Harrow	2001
	15	Enfield	1999
	8	Hackney	1998
	85	Total	

⁶ See DCLG (2007:para 4.3) for another set of distribution criteria.

Fig 2. Authorised pitches 2007

Fordham (2008)

10 or less pitches



H&F Hammersmith and Fulham
 K&C Kensington and Chelsea
 Isl Islington
 Tower H Tower Hamlets
 West City of Westminster
 C Corporation (no pitches)

Choice

Increased choice of location for Gypsies and Travellers means addressing the voids in current pitch provision. Figure 2 also shows how the whole of the Northern sub-region⁷ now has only 15 authorised pitches (Fordham 2008). This element of choice is best addressed by, again, bringing each borough up to a minimum provision.

At two recent meetings, one called by the London Gypsy and Traveller Forum and another called by LGTU with 40 travellers attending, there was general willingness to move up to seven miles from where they are in order to get a residential pitch.

Staying put

Some families will need to stay in the same area because of family and community ties or because they have children at school. So the present population distribution, representing this need to 'stay put', should also be a component of the setting borough targets.

6.2 Show Peoples Yards

→ The distribution methodology should cover the locational needs of show-people for 80 yards to 2012 and 133 to 2017.

The present distribution of yards is highly skewed with 55% being in Hounslow (Fordham 2008:157). When asked where new pitches should be "...only 14% of Travelling Showpeople intending to move in the next 5 years expressed a definite preference for their current borough of residence, with most giving much wider area preferences such as 'West London' or 'Near M25', although extended families tended to express a preference to live in a single small locality".

The policy of the Showmen's guild is that

"initially existing sites should be considered to see where small extensions can be made to allow for family growth, with the agreement of the Showpeople at the existing yards and of course taking into account the local environment. This will accommodate some family growth.

Where this is not practical, for instance where existing yards are landlocked and overcrowded, groups of perhaps 6 or more families will form collectives and seek appropriate land. We believe that areas such as East London, North London, South West London would be ideal locations for such new developments and would redress the imbalance at present as families traditionally lived in these areas but were moved out over years." (Ray Smith, Showmen's Guild of Great Britain)

6.3 Transit pitches

→ The distribution methodology should cover the locations of 40 transit pitches.

Fordham (2008) suggest a need for 40 transit pitches (2007-2012) and that "providing one transit site in each sub-region would be likely to meet the needs of those travelling through or visiting family in London. Furthermore, some of the total provision could be met through visitor pitches incorporated in future residential sites."

⁷ Note that sub-regions have been discontinued.

6.4 Major development opportunities

- ➔ The GLA should expect to see a robust argument put forward by any borough if a major development comes forward and the opportunity to deliver pitches is not considered. (from GoEast 2008 para 7.35)
- ➔ The distribution methodology should cover the opportunities of major developments such as the Olympic Legacy and the Thames Gateway.

The automatic consideration of Gypsy and Traveller accommodation for inclusion in large developments is an example of good practice in mainstreaming.

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.”

Gypsies and Travellers themselves favour being considered for inclusion in major developments.⁸

Both the Olympic legacy and the Thames Gateway provide opportunities for the development of sites and yards. This is so in the short term, using idle land for temporary sites, and in the long term for permanent sites that are fully integrated in the final development scheme. These are exactly the large scale developments that allow the sustainable and inclusive development of Gypsy and Traveller sites to be mainstream from the start.

⁸ For example, discussion at the London Gypsy and Traveller Forum (22/1/09).

7 Draft distribution methodology

This section gives extracts from the response by the London Gypsy and Traveller Unit to the GLA paper: *Stakeholder consultation on the methodology for distributing targets new pitches across the boroughs* (GLA 2009). The full response is available from LGTU

7.1 Distributing London's total need for pitches

Bringing together equity, choice and 'staying put' discussed in the section above, LGTU believes that the GLA should distribute London's total need for residential pitches as follows:

Equity and choice:

New pitches should be allocated to boroughs so that each has a certain minimum number (new plus existing). 15 appears to be a common number for this minimum. It was the borough requirement under the '68 Act, however, 20 or so pitches might be considered reasonable given site closures and enforcement since the repeal of the '68 Act.

Staying put:

The remaining need should then distributed be to each borough in proportion to its existing share of London's Gypsy and Traveller population.

7.2 Opportunities and constraints

These opportunities and constraints will be used to derive the boroughs' land capacity to deliver new pitches which is compared with the distribution of need when deciding of boroughs' targets for new pitches. The GLA's initial proposals for the opportunities and constraints and LGTU's comments:

Issue	Opp/Con	Reason	LGTU response
Greenbelt / MOL	Constraint	Policy presumption against development	Consultation needed
CAZ / Town centres	Constraint	Inappropriate locations for low density development	welcomed
Industrial Land Release Designation	Constraint & Opportunity	Reduced likelihood of land becoming available in boroughs with 'restricted' categorisation of industrial land release, opportunity for boroughs with 'managed' release	acknowledged
Land overlooked	Constraint	The outdoor cultural lifestyle of Gypsies and Travellers makes overlooking a particular problem.	Add this constraint: eg. sites in high rise housing areas lack any sense of privacy.
Existing areas of housing	Constraint	Redevelopment less likely if land already taken by housing (with multiple private owners)	Delete: This constraint, as presently worded, smacks of exclusion and should be deleted: New sites should be built near to or in existing areas of housing where possible.
Housing developments (low density)	Opportunity	The potential of any land , identified for housing development, should be considered also for pitch provision	Add this opportunity: as above
Estate Renewal Areas	Opportunity	Potential for provision of pitches through estate regeneration	welcomed
Opportunity Areas	Opportunity	Potential for provision of pitches to be appropriately planned at the outset for large-scale developments	welcomed
Other large scale developments	Opportunity	Potential for provision of pitches to be appropriately planned at the outset for large-scale developments	welcomed
Publicly owned land	Opportunity	Potential for borough to provide impetus for delivery of sites	welcomed
Brownfield Land	Opportunity	Greatest potential for provision of pitches in London context	welcomed
Access to Strategic Road Network	Opportunity	Benefits for G&T Pitch provision	Delete: Most Gypsies and Travellers say that this is not important to them. It has, in the past, been associated with very poor environmental conditions like sites built under motorways. But travelling show-people and mobile Travellers needing transit pitches should be consulted

References

- Brown P, Niner P. 2009. *Assessing local housing authorities' progress in meeting the accommodation needs of Gypsy and Traveller communities in England*. Research Report 13. EHRC
<http://www.equalityhumanrights.com/Documents/Assessing%20local%20housing%20authorities%27%20progress.pdf>
- Cemlyyn C, Greenfields M, Burnett S, Matthews Z, Whitwell C. 2009. *Inequalities experienced by Gypsy and Traveller Communities: A review*. Research Report 12. EHRC
<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. 2007. *Gypsy and Traveller Accommodation Needs Assessments – Guidance*
<http://www.communities.gov.uk/documents/housing/pdf/accommneedsassessments.pdf>
- DCLG. 2007b. *Preparing regional spatial strategy reviews on Gypsies and Travellers by regional planning bodies*
<http://www.communities.gov.uk/documents/housing/pdf/321445.pdf>
- DCLG. 2007b. *The Road Ahead: Final Report of the Independent Task Group on Site Provision and Enforcement for Gypsies and Travellers*
<http://www.communities.gov.uk/documents/housing/pdf/roadahead.pdf>
- DCLG. 2008a *Designing Gypsy and Traveller Sites - Good Practice Guide* Para 3.6
<http://www.communities.gov.uk/documents/housing/pdf/designinggypsiesites.pdf>
- DCLG. 2008a. *Gypsy sites provided by Local Authorities and Registered Social Landlords in England*. Table 2
<http://www.communities.gov.uk/documents/housing/xls/table2.xls>
- DCLG 2008b. *Regional Spatial Strategy and Local Development Framework Core Output Indicators – Update 2/2008*
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/coreoutputindicators2.pdf>
- DCLG undated. *Grant awards under the Gypsy and Traveller Sites Grant for the financial year 2008/9*
<http://www.communities.gov.uk/documents/housing/xls/sitesgrantawards.xls>
- Fordham 2008: Fordham Research. 2008.
London Boroughs' Gypsy and Traveller Accommodation Needs Assessment & Appendices:
<http://www.london.gov.uk/mayor/housing/GTAA/index.jsp>
- GLA. 2008. *Draft London Housing Strategy*
<http://www.london.gov.uk/mayor/housing/strategy/docs/strategy.pdf>
- GLA. 2008b. *Draft Methodology Statement for discussion: London Housing's Capacity 2009*
<http://www.london.gov.uk/mayor/planning/housing-capacity/docs/methodology-paper.pdf>

- GLA. 2008c *Draft Methodology Consultation Response Summary: London Housing's Capacity 2009*
<http://www.london.gov.uk/mayor/planning/housing-capacity/docs/methodology-paper-responses-list.pdf>
- GoEast. 2008. *Planning For Gypsy And Traveller Accommodation In the East of England: Inspectors' report of the EiP Panel*
http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/ReportfinalrevDec08.pdf
- GoSW. 2008. *The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of States Proposed Changes*
http://gosw.limehouse.co.uk/portal/regional_strategies/drss?pointId=1206445417954
- HCA 2009: Homes and Communities Agency. *Gypsy and Traveller Sites - Grant Guidance 2009-2010*
<http://www.homesandcommunities.co.uk/public/documents/HCA%20GT%20Guidance%20FINAL%20300109.pdf>
- Home R and Greenfields M. 2006. *Cambridge Sub-Region Traveller Needs Assessment*
http://www.partnershipdevelopmentproject.org.uk/Traveller_Needs_Final_Report_March_2006.pdf
- LGTF 2004: London Gypsy and Traveller Forum. Minutes of the meeting of 29th September 2004. unpublished
- ODPM. 2002. *Allocation of Accommodation: Code of guidance for local housing authorities*
<http://www.communities.gov.uk/documents/housing/pdf/157737.pdf>
- ODPM 2003. *Counting Gypsies and Travellers: A Review of the Gypsy Caravan Count System – summary*
<http://www.communities.gov.uk/publications/housing/countinggypsiesamp>
- ODPM. 2006. Circular 01/2006. *Planning for Gypsy and Traveller Caravan Sites*
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/circulargypsytraveller.pdf>
- ONS 2008: Office for National Statistics. *Regional Trends 40 1995-2005 figures.*
http://www.statistics.gov.uk/downloads/theme_compendia/Regional_Trends_40/RT40_Chapters_3_to_13.pdf