

**Written submissions received for the London
Assembly's Housing Committee investigation into
Gypsy and Traveller Site Provision in London**

Ref	Organisation	Position/Title
Sub-001	Heine Planning Consultancy	Alison Heine - <i>Planning Consultant</i>
Sub-002	Royal Borough of Kingston upon Thames	Nathalie Wilson - <i>Community Development Worker for Marginalised Groups</i>
Sub-003	London Gypsy and Traveller Forum	Ilinca Diaconescu – <i>Planning Policy</i>
Sub-004	London Gypsy and Traveller Unit	Geraldine Lindsay
Sub-005	Member of gypsy & traveller community	Tracie Giles
Sub-006	Kensington and Chelsea Social Council	Phil Regan - <i>Volunteer</i>
Sub-007	The Traveller Movement	Matthew Brindley - <i>Policy Manager</i>
Sub-008	London Borough of Camden	David Morrissey - <i>Principal Planner</i>
Sub-009	Member of Gypsy & Traveller community	Jennifer Maughan
Sub-010	Member of Gypsy & Traveller community	Kathleen McDonagh
Sub-011	Member of Gypsy & Traveller community	Marian Mahoney
Sub-012	London Borough of Lambeth	Tom Tyson - <i>Strategy Team Leader</i>
Sub-013	London Borough of Hackney	Christopher Kennedy - <i>Councillor</i>
Sub-014	Member of Gypsy & Traveller community	John Power
Sub-015	London Tenants Federation	Sharon Hayward - <i>Co-ordinator</i>
Sub-016	Royal Borough of Greenwich	Ian Wall - <i>Strategy Officer</i>
Sub-017	Kent Council	Bill Forrester - <i>Head of Gypsy and Traveller Unit</i>

Heine Planning Consultancy

Alison T Heine B.Sc, M.sc, MRTPI

10 Whitehall Drive, Hartford, Northwich, Cheshire CW8 1SJ

Tel: 01606 77775 e-mail: heineplanning@btinternet.com

21.9.2014

Mr D Johnson
London Assembly
City Hall
The Queen's Walk
London

Dear Mr Johnson

Gypsy and Traveller site provision in London

I thank you for the opportunity to respond to your letter of 14 August 2014. I am a planning consultant with over 30 years experience in Planning related matters. Since 2005 I have been a sole trader in my own business. I specialise in assisting Gypsy-Travellers with planning advice, planning applications and appeals. I have prepared expert witness statements and also make submissions in respect of local plan policies. I have worked with many Gypsy-Travellers and showpersons in the London Boroughs of Havering and Bromley, but also in Enfield. I was also involved in the relocation of sites in the Olympic Park and have commented on enforcement action in Haringey. I am currently involved with a planning appeal for a site in Hillingdon. The one striking feature of Gt London is the fact there is a far higher proportion of Travellers living on socially provided sites than in other parts of the country and far fewer applications for private sites, due, I suspect, to the high cost and shortage of land in the London area and extent of Green Belt land.

I must congratulate you on identifying some very important key issues and for seeking a Gt London wide update on the current situation. It will be most interesting to see the results of this investigation.

Gypsy and Traveller community

Q1 What would be the best way to assess need?

A- most definitely not as it is at present. The current system is ad hoc and fails to provide consistency of approach. The need assessments ask too many irrelevant questions of small population samples so the results are pretty meaningless. The process seems over complicated and expensive for what is involved. The current guidance to doing need assessments is under scrutiny. The current Government has distanced itself from the 2007 guidance because one firm (ORS) has advised that the household formation rate should be lower than that previously advised. But there is no objective assessment of this issue.

There is the vexed question of who qualifies as a GT. The Government is seeking to amend the official definition. I suspect many families living on Council sites no longer travel for an economic purpose. There is insufficient regard to the cultural preference to live in caravan with other travellers on caravan sites laid out with space for touring caravans and with separate utility blocks, and where they can keep pets and horses. Any old caravan site will not do. Most residential park homes have age restrictions, do not have separate utility blocks and do not permit storage of touring caravans let alone use of touring caravans as additional living space.

Studies fail to deal with the migration issue because it is too complex.

Studies repeatedly avoid the needs of housed Travellers yet I am aware that quite a lot of those who contact me for help have been living in housing and are simply fed up pretending to be something they are not and want out. Councils should not underestimate the number of GTs in housing who do not want to be there.

Studies often fail to make an effort to contact all Travellers and interviews are done over a very limited survey period-sometimes when many sites are unoccupied.

ORS studies appear to identify an under reporting of males in the 20-60 age group.

I fail to see how it can beyond the wit of Councils and Government to organise a one off, nationwide assessment to identify where Travellers are living, how many have need for more pitches and where they want to settle. The current system of individual or groups of authorities carrying out assessments means

- they are not comparable and use different methodologies
- they are all done to different time periods
- they could be double counting or omitting families who are highly mobile.

I am also increasingly concerned that such studies are not transparent and the factual basis is not being checked thoroughly. Another problem is the fact some authorities ignore the findings and will not make provision for a range of sites by location, size, tenure, ethnic background and take a one size fits all approach because this is much easier for them. Many families I work with will relocate rather than be made to occupy a site they do not want or share a site with a family they do not get on with. Travellers should be given the same choice of accommodation that many in the settled population come to expect. They should be free to move to different parts of the country.

I am aware that the Planning Inspectorate will address Councils on these matters. If they have not already done so I would be surprised if they are not be prepared to make a joint presentation to all Gt London authorities on the pitfalls of need assessments and local plan/ site allocation preparation. I understand they did this for Kent authorities. In the absence of clear guidance from the Government, it is the Planning Inspectorate that we must rely on for guidance. The recent 18 page critique of the Central Bedfordshire Traveller local plan highlights the issues that have to be considered. It is not an easy process partly because it is subject to so much scrutiny by other interested parties and politicians.

I should like to add something further on the local plan preparation as I feel this is something your investigation should look into in more detail and may be missing from your questions. At present there are some 340 local authorities in England preparing new Local Plans. The process is horrendous. It takes ages. It is complex. Local authorities contact some organisations like the Gypsy Council and Friends Families and Travellers and think they have done their bit. These organisations do not have the staff or resources to respond to all these plans. The process involves endless reports. It is hard to keep track of changes made. It is hard to respond if you do not have good knowledge of an area. Travellers are unable to contribute. I have yet to come across a Traveller who understands the process or would know how to respond in any meaningful way. I struggle as a qualified planner. There are very few consultants working with Travellers who have the time or inclination to get involved. Most of this work has to be done at our own expense in our time. House builders will pay consultants to do this work for them. It feels like most local authorities take advantage of the fact Traveller needs will not be represented or overlooked. Thankfully the Planning Inspectorate has promised us that they will scrutinise local plan preparation and the assumptions behind the policy decisions. As a result, many Traveller policies are being found unsound. That is good news insofar as it means bad policy making is halted. But it is bad news in so far as few local authorities have any uptodate policies or adopted site allocation plans. Progress is painfully slow. It felt like we were making real progress under the old circular and that has halted. There does not appear to be any commitment to plan preparation. In April 2013 I attended the EIP in Havering in 2013 as I was so concerned about the process followed. It was apparent within 30 minutes of that Examination that the Inspector was unimpressed and had serious misgivings. Nothing further has been heard since the Traveller Local Plan was found unsound. It all feels like it was a total waste of our time and effort to come down to London and take part in the process. The Travellers who attended were unimpressed and remain in disbelief that some 18 months later there has been no follow up. Councils can not expect members of the public to spend precious time and resources commenting on the plan making system if their plans are found unsound and they do not follow proper procedures. At times it has felt like Council's have deliberately made little effort in drafting policy or assessing need, in the hope some kind hearted consultant or planning inspector will correct it for them, re write their policy and let them off the hook. Actually, it does not work like that.

In Gt London the process appears to have been further hampered by the Ministerial Statements issued July 2013 and January 2014 and the recent statement issued last week from Brandon Lewis. These have added uncertainty to the process. Local authorities do not know how to proceed. They are damned if they do and damned if they don't. The current government appears to be rewarding those who do nothing. That can not be right. The current government is not supportive of sites in the Green Belt and now no longer seems supportive of sites outside settlement boundaries. This is unrealistic but it has implications for many Gt London authorities and it is unclear how sites will be delivered if you can not rely on land in the Green Belt. It is equally hard to see what is achieved by forcing councils to remove sites from the Green Belt as part of the Local Plan (ie in order to grant permission for existing sites that do not have permanent consent) if those sites punch holes in the middle of the very area to be protected.

Q2- Have you been involved in the site allocation process. Could GT engagement in the process be improved and if so how?

A-I am not aware of any site allocation process in Gt London but must express shock and dismay at the lack of transparency in other parts of the Country with this process.

I am rather doubtful as to the transparency of waiting list procedures. Many require Travellers to renew interest on an annual basis but this is not apparent to the Travellers who not unreasonably think that once they have registered an interest they will be kept on the list. Most Travellers know that waiting lists are ignored. Families already occupying a site will 'bags' a plot as soon as it is vacated before they are even offered it. Most pitches go to those already living on a site.

There is still a need for better education for Councillors from Parish Council level upwards. There is still considerable race hate undertones to many of the comments that are made. Most councillors fail to engage with their local GT population.

In Kent, a bespoke policy was agreed for the new site at Coldharbour to ensure only families living on sites in the Green Belt that were unauthorised or with temporary permissions were offered pitches. In the end Kent CC allocated sites to others but Kent CC will not tell us who were allocated pitches or to whom. I learnt this weekend that Irish Travellers living in Buckinghamshire secured plots yet I am aware that applications/expressions of interest from Irish Travellers seeking sites in Greater London were not take into consideration.

In Cheshire where I live a similar process is taking place. The Council has told Travellers living in housing that they do not have an allocation policy and no application forms for pitches on two new sites at the same time as they are handing out application forms to families living on sites with no permanent consent in the Green Belt.

Families displaced into housing are being denied a chance to apply for sites and preference is being given to those who could afford to self provide, did not want to move onto a socially provided site but had the misfortune to choose sites in the Green Belt. The allocation system is favouring those who carried out unauthorised development over those who accepted housing some 5-7 years ago on the understanding / promise the Council would provide a site for them. This is creating understandable resentment amongst the Travelling community.

Q3- What happens to members of the community who cannot get a pitch?

A-This is a great question. I often wonder what happens to those whose appeals fail. I will occasionally hear from families but many seem to loose contact. I think it varies. I suspect

-in Gt London many are displaced and forced to live elsewhere. I have made this point repeatedly to local authorities around Gt London. They are having to make provision for families who can not find land in Gt London. This problem is being compounded by the current reluctance of the Government to support applications for sites in the Green Belt. The implications of this for need assessments has not been taken into consideration.

-most double up with families in breach of conditions imposed on authorised sites. Since 2006 a lot more private sites have been granted permission making this a more viable option.

-some will still pull onto land they buy and then seek planning permission though I think most now realise they should secure permission first. But because we are now waiting two years for the Secretary of State to issue decisions on Green Belt sites I suspect Travellers are once again pulling onto sites before securing permission as they are not prepared to live this long on the roadside whilst the current Government makes a decision.

-very few get pitches on socially provided sites for various reasons but usually because council sites are full and taken with established families and those seeking to self provide are usually self employed and can not afford the high cost of pitch rental. I strongly suspect many families on socially provided sites are on benefits and having the pitch rental fee paid for them. I am aware of many families who do not claim benefits but do not have a regular income and would worry they could not make regular rent payments plus the cost of community charge and often high cost of electricity on sites. I am aware of families stopping on the edge of council sites unable to secure pitches.

-a few move onto other caravan sites eg holiday caravan sites where owners let them live year round in breach of licence regulations.

-a very small minority find willing land owners (eg farmers) who let them stay on farms

-some stop in houses and live in their caravans on the driveways.

-some go abroad. I am increasingly aware of families working/living in the USA, Australia and continent (Sweden, Germany, Holland, Belgium) where they are getting work and can stop on caravan sites that appear to be open year round.

Q4 To what extent is access to health services and education affected by limited site provision?

A-For families who are still highly mobile there are still serious issues and I still come across tragic cases of families coping with health issues that are not being sorted out. But I think it is less of an issue than previously. Because we have more sites and possibly more families are settling in housing in my experience most families have an address they can 'borrow' to register with a GP and fewer are making use of A&E Depts. But I still come across families who are not receiving childhood inoculations, check ups for cervical cancer, eye tests for children etc. They often have to travel considerable distances to have check ups and I still find that pregnant mothers are not receiving check ups because they are not settled. I am however heartened by how many GPs are willing to write in support of planning applications-often waiving fees for doing so.

Education is different. It is impossible to access education from a road side existence. You simply can not expect children to move from one school the next. They never make friends, they never settle in, their parents can not be expected to buy a different uniform for each school attended etc.

Where families have settled on their own sites I am seeing more children attending secondary school and colleges. That has been one of the most rewarding aspects of my job. In my experience most school teachers are also greatly committed to helping Traveller children and go that extra mile to help when they realise how committed parents are and how much extra help the children need because their own parents can not read or write or families living in caravans with out computers and internet connections and can not help with homework.

Q5 How should local authorities engage with GT living by the roadside?

A-The problem of roadside families seems to be on the increase again after a spell where I felt it had almost gone away. Local authorities are making very little transit provision, traditional stopping places no longer exist or are blocked off and families often struggle to be accepted on other caravan sites. From what Travellers tell me they get much less hassle off the Police because the Police are fed up doing the work of the local authorities when those local authorities have failed to make provision. Families also seem to travel in smaller groups nowadays to avoid attracting too much attention.

Those on the roadside do not ask for much but would appreciate

- a) Some where to stay for periods of 3-4 weeks when they visit a town for work
- b) Skips for rubbish
- c) Portaloos
- d) Water bowsers

- e) Help with accessing health and education
- f) For the Police to patrol to maintain law and order and safeguard families from race hate crime.

Leeds CC has pioneered accepted stopping places for families moving around Leeds and this system appears to work on a limited basis but is not a permanent solution.

Cheshire CC also provided an accepted stopping place for families due to the absence of provision. Again this has worked well –perhaps too well and it has been in existence far longer than it should whilst the Council struggled to find a permanent solution.

It would be appreciated if I could be sent a copy of your report once the investigation is completed.

Yours sincerely

Mrs Alison Heine

Nathalie,

I have been able to provide a response to some of the Borough questions set out in the Call for Evidence letter – please see below. I think Housing are better placed to respond to some of the Borough questions.

Regards,
Sheree

- **How do you go about assessing current and future housing need among the local Gypsy and Traveller community?**

Kingston's Core Strategy was adopted in April 2012. The plan contains Policy DM16 'Gypsy and Traveller Sites' which provides a commitment to producing a development plan to meet the needs of gypsies and travellers. In 2012, officers began work on the Gypsy and Traveller Sites Development Plan Document (DPD). A series of evidence base studies was undertaken to inform the draft plan, including an assessment of need.

To establish the overall need it was necessary to identify:

- the current numbers within the borough on authorised sites;
- the current numbers within the borough on unauthorised sites;
- the "hidden" population those living within bricks and mortar housing but with an aversion to bricks and mortar;
- the net migration in or out of the borough;
- the estimated "household" formation over the plan period.

The evidence assessed the current and future predicted need for English Gypsies within Kingston and for Irish Travellers within Kingston, allowing a calculation of landtake required for the additional Gypsy and Traveller pitches. Please note, production of the DPD has been delayed.

- **Have you produced your own borough GTANA? If so, please direct us to the findings.**

In line with Council Core Strategy Policy DM16, work on a Gypsy and Traveller DPD began in 2012. A first draft DPD was produced in early 2013 and approved for public consultation at a Council Committee meeting in March 2013. However, the statutory Sustainability Appraisal work concluded that further assessment of potential sites was necessary and the DPD has not progressed.

- **How are you meeting the Duty to Cooperate with neighbouring authorities?**

Prior to the production of the draft DPD, Planning Policy Officers met with those at neighbouring authorities to discuss Gypsy and Traveller sites provision. Should work on the DPD recommence, further duty to cooperate work is necessary to ensure the most up-to-date evidence is available.

- **Do you see a value in a revised pan-London or sub-regional GTANA commissioned by the GLA?**

Yes, it is considered that there is value in a revised pan-London GTANA. This would assist London Boroughs, such as Kingston, who do not have an up-to-date local needs assessment.

- **Which criteria do you apply when considering proposals for new sites?**

Core Strategy (April 2012) Policy DM16 sets out criteria for proposals for new sites:

"Proposals for new sites should meet the following criteria:

- a. have access to local services including shops, schools, GPs and other health services
- b. have good access to and from the public highway, bus routes and other transport modes
- c. not be located in areas of high flood risk
- d. not be located on contaminated land"

- **Since GTANA 2008, how many net new sites and pitches have been created and sustained in your borough?**

The Council run site at Swallow Park has been extended to provide three additional pitches. There are now 18 pitches

Gypsy and Traveller Community – from English Gypsy site:

What would be the best way to assess the current and future housing need of the Gypsy and Traveller community?

Family 1:

The best way would be to ask the Gypsy and Traveller communities themselves. The residents on plots will know how many plots are needed as it is linked to the number of children/ grandchildren on sites.

This family said that their son has been waiting for a plot for 18 years and so is travelling around the country, but is being continuously pushed on. That particular family said they know of at least 7 people who need plots. As Mrs X said 'It's a waiting game and I don't think that's fair'. 'We used to move on from place to place, and before the council were fine with that but it's all changed now, we're not allowed to travel anymore. We've been on a site for more than 20 years'

Family 2:

'Not sure. Every Borough should have a site, there should be equal provision for each Borough. If someone's lived on site for their whole life and they are getting married, they should have priority to go onto that site. Not someone from outside, even if they're related. The children on site should have priority for future pitches on that site. The council should go around and ask the people on pitches.'

Have you been involved in the site allocation process? Could Gypsy and Traveller engagement with the process be improved and if so, how?

Family 1:

They were not asked and said that everyone on site should have been asked. This would be the way to get an accurate picture of the number of future sites needed.

Family 2:

'We weren't involved in the allocation process.'

What happens to members of the community who cannot get a pitch?

Family 1:

The people who can't get a pitch, get pushed around from the side of the road. They may also go on their parents' site but the council don't allow that anymore. 'And if a plot becomes free, we are asked to bid for it, which is a complicated process'. The family described how they don't understand the process, for example someone on site may have been staying on their Dad's plot a long time,

waiting for a free plot, which is then allocated to someone else. 'When a plot on site becomes available this should go to a member of the family, not a stranger'. Instead of refurbishing the site, the family said that the council should have built a new site. In Surrey people who have been waiting for sites, have gone to the local authority with an identified free plot of land and been told that there is no money to do the sites. People have been told that in time new sites will be built but are actually now been told there's no money. 'It's all promises, you're on a promise but nothing comes of it'. 'If we want to buy a plot of land and build on it, and we ask the Council we're told No'. 'The sites they want us on are out of town. Ask the residents here, they don't want us here. If anything's stolen, they think it's us'.

Family 2:

'When children get married, they want to live on the site where they grew up so they move onto their parents' pitch. But because they can't stay there anymore, they have to go on the road and move from place to place. Once a child gets to 16, it should be highlighted that they may need a pitch in the future. The council need to keep a list'

To what extent is access to health services and education affected by limited site provision?

Family 1:

For the people that are travelling, they go to the local hospital. When they move on, they just go to the next hospital. The hospital will ask where they went last and get the notes from there. With regards schools, the children may stop at a school but are usually taught by their mum. 'Travelling children want to go to school, but they're not given a chance because there are no sites to stop. We want to give our children the chance we weren't given. We didn't have a chance. Schools are usually understanding and will have the children, but then people are asked to move on, and the children have to leave. They don't want to leave.'

Family 2:

'Whatever area you are in, you can go to the local health centre and they will have you as a temporary patient.'

How should local authorities engage with Gypsies and Travellers living by the roadside?

Family 1:

Councils should ask the Travellers what they want first before trying to move them on. The council should build more caravan sites for the Travellers and the Gypsies.

Family 2:

'It frightens the children when the police go on site. There should be one person that goes to them, with a notice letter and hand it to someone. Or if no one wants to take it, they should put it on someone's caravan, that way they are given notice and it holds the peace for a little while. They shouldn't come with the police straight away.'

London Gypsy and Traveller Forum

Response to the Housing Committee Investigation on Gypsy and Traveller accommodation needs and provision in London

September 2014

The London Gypsy and Traveller Forum aims to improve the lives of Gypsies and Travellers in London, particularly in relation to their accommodation needs and to promote their rights as Londoners to equal treatment.

It does this through exchange of information, discussion, promotion of good practice, challenge of poor practice, and advice to the GLA, the London Mayor and all other London authorities.

The Forum is open to London Gypsies and Travellers, organisations representing them, council officers, elected representatives, service providers and other interested individuals and organisations who live or work in London, and who support and are prepared to work towards the above aim.

Our response to this call for evidence summarises the views of the Forum as a whole, however we have encouraged individuals and organisations to submit their own evidence and local knowledge.

We wish to point out that while the Forum seeks to be representative of the multiple agencies and community groups across London, it should not be regarded as the only means to consult with Gypsy and Traveller communities and support organisations. We would suggest that engagement with the community in order to collect evidence should have been more thorough. In particular, to ensure maximum accessibility and chances for people to respond, it would have been helpful to provide an easy read format of the investigation questions, as well as workshops where officers explained the scope and research topics. We would recommend that the GLA creates a database of contacts within the Gypsy and Traveller community and support organisations.

Our response addresses a number of the investigation topics, organised around a few main themes as follows.

1. Gypsy and Traveller Accommodation Needs Assessments

The Forum's view is that there is a great merit in conducting a London wide Gypsy and Traveller Accommodation Needs Assessment to support the strategic policies in the London Plan and the London Housing Strategy. We do not agree with the current London Plan policy which treats general housing targets differently to Gypsy and Traveller pitch targets, providing a clear figure for one and not for the other. This creates conflict and unfair competition between the two forms of provision, as Local Authorities are pressed to meet very high housing targets and make as much land available for this as possible. Despite the requirements of the Planning Policy for Traveller Sites, local authorities can justify their failure to identify a supply of land for Traveller sites through their efforts to meet the London Plan housing targets.

While some Local Authorities seek to conduct a robust and adequate GTANA in order to satisfy Planning Inspectors examining their Local Plans, there are big variations in approach and commitment among the London Boroughs. As GTANAs get scrutinised and open to public discussion only at the later stages of Local Plan production, the opportunities to challenge underestimated figures of need or poor methodology are very limited. There is also a concern regarding the lack of accountability in a borough by borough approach. If there is no coordination and monitoring of how GTANAs are undertaken at a sub-regional and regional level, it is extremely difficult to ensure the accuracy and suitability of these studies.

In what regards the Duty to Co-operate on assessing the needs of Gypsies and Travellers, the lack of standardised practice and guidance on this issue makes it easier for local authorities to justify the failure to collaborate. Apart from the GTANA currently being conducted jointly between Kensington and Chelsea and Hammersmith and Fulham, we are not aware of any other examples in London where neighbouring boroughs have worked together effectively on this issue.

On the question of how needs assessments should be conducted, we would stress the importance of reaching out to the community and seeking to contact and interview as many Gypsies and Travellers as possible. We recognise there are huge gaps in data collection within local councils, but a variety of methods should be used to create databases of families living in the local area, including data from the 2011 Census, from up to date waiting lists, contacts made through Traveller Education officers and dedicated health workers, support organisations and networks. It is particularly important to reach out to members of the community living in bricks and mortar accommodation. More innovative forms of engagement can also be explored, such as the use of social media to disseminate information and call for participation.

Finally on the issue of Gypsy and Traveller Accommodation Needs Assessments we wish to flag up the changes proposed by DCLG to the definition of Travellers for planning purposes and subsequently to the Planning Policy for Traveller Sites and GTANA guidance, which we believe would have extremely negative impacts on the Gypsy and Traveller community. We would urge the Housing Committee to take into consideration all the responses and evidence received as part of this investigation and make recommendations to the Mayor despite the current uncertainties regarding government guidance.

2. Barriers to securing land for Gypsy and Traveller Sites

We believe one of the main barriers to identifying the required supply of Gypsy and Traveller Sites is the cost of land, especially since council owned properties are increasingly being sold off. Additionally, the pressure to build more housing and the viability and deliverability tests introduced by the NPPF make the provision of low density, family accommodation such as Gypsy and Traveller sites very difficult.

Another important barrier to site provision is the lack of political will within local authorities, or the fear of opposition from other local community groups. In many cases identifying and allocating a site for Gypsy and Traveller accommodation is a decision taken by councillors

rather than planning officers, and unfortunately it remains a politically contentious issue despite the requirements of the Public Sector Equality Duty.

There are concerns about the lack of transparency in the site search and assessment processes. We have examples of local authorities who have spent large amounts of money outsourcing site assessment studies which came back with no suitable results. These studies are very inaccessible to the Gypsy and Traveller community, who is rarely engaged directly in land searches. The issue here is that consultants and council officers tend to make assumptions about the characteristics and suitability of sites for Gypsy and Traveller accommodation, without having much understanding of the local community, their needs and preferences.

Many Gypsies and Traveller across London have been involved in some sort of land search or have proposed sites to their local authority. Their experience is usually that every proposal is turned down without adequate justification. Council officers tend to point out constraints and barriers such as ownership and policy designation, without giving consideration to possible mitigation strategies. There are sites in London such as the Olympic relocations in Hackney and Newham where such barriers were eventually overcome due to the pressure of delivering the new sites to make room for the Games.

3. The impacts of insufficient site provision

The shortage of Gypsy and Traveller sites has a great impact on this community, limiting the options for suitable accommodation and placing them in vulnerable situations. For many Gypsies and Travellers, especially those who have grown up on sites, not being able to live on a pitch equates with being separated from family, isolated and denied the right to ethnic and cultural identity.

Usually when members of the community can't live on a pitch due to a lack of provision, they will seek to live on site with their family, which can cause overcrowding and potential conflicts. The next option is to accept an offer for social housing if the local authority has the capacity to make one. In the current climate, such offers tend to be outside of the Borough or even London, meaning that family support networks are dispersed.

Finally, due to the huge pressures on the limited stock of social housing, many Gypsies and Travellers end up in private rented accommodation or emergency housing such as hostels. This means they face insecure tenancies and very often extremely poor living conditions. In addition, the changes to the welfare system such as Universal Credit have affected large proportions of those in private properties, as they are often unable to afford the rent and bills and thus very likely to be evicted.

There are cases where young families accept offers of social housing or look to rent in the private sector, provided that the property is in proximity to where their family lives. Otherwise, being separated from family, placed into culturally unsuitable accommodation and often more vulnerable to discrimination from the neighbours have extremely negative impacts on Gypsies and Travellers, especially in terms of health. Existing research shows they tend to have a higher incidence of mental illness such as depression and anxiety.

There are cases in which members of the community who cannot get a pitch and cannot live in bricks and mortar housing due to the negative impacts mentioned above will set up

unauthorised camps. These also occur for other reasons, such as travelling in the absence of a transit site. In what regards the addressing unauthorised encampments, it is unclear whether all the London Boroughs have a clear policy on this and a set of procedures in place. We are of the view that if councils have a protocol which supports families on camps while they find a legal place to stay rather than moving them on or issuing eviction notices or other forms of enforcement action, this is likely to be more effective, cause less conflict and have less of a negative impact on them. However, there aren't standards for best practice, and good case studies tend to depend on the approach of individual officers. For instance, Croydon has been known to the Forum as an example of good practice, however the officer dealing with unauthorised camps has recently left and now families are being given 24-48 hours to move elsewhere.

In terms of access to healthcare, education and other services, this is obviously limited or disrupted by the transient lifestyle involved by having to relocate so often. The benefits of living on a site include the fact that children can go to school regularly, there is a better chance to integrate in the wider community and more secure access to healthcare. In Lewisham for example, due to the fact that the Travellers site was closed down over 7 years ago and never replaced, parts of the community now gather in the house of family members in order to be together. The necessity of being close to family and having their support often overrides the need to be home for health visits, or the need to go to school.

Recommendations

We wish to make a number of recommendations which we hope the Housing Committee will pass on to the Mayor:

- To ensure a strategic approach to meeting the needs of Gypsies and Travellers, the GLA should commission a Gypsy and Traveller Accommodation Needs Assessment, which should be based on local research and interviews with community members at local level, but with the results collated at a London wide level. This should be used to inform the London Plan and London Housing Strategy in the form of pitch targets.
- The GLA should actively support local authorities to identify land for Gypsy and Traveller sites and prioritise this together with general housing provision.
- The GLA should actively support local authorities in delivering new pitches with the support of the Traveller Pitch Fund, instead of waiting for councils to bid for this funding.



The Implementation of the Planning Policy for Traveller Sites in London

London Gypsy and Traveller Unit
April 2013

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

1. Introduction

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 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 30 years.

The National Planning Policy Framework and Planning Policy for Traveller Sites, adopted in March 2012, set out the Government's approach to planning in a set of policy requirements that must be met by Local Authorities in their development plans. One of the key principles of the national planning policy is to ensure collaboration between Local Authorities, stakeholders, community groups and their support organisations. The Planning Policy for Traveller Sites aims to mainstream the provision of culturally appropriate accommodation for Gypsies and Travellers by requiring Local Authorities to develop fair and inclusive planning strategies.

This report aims to assess the progress made by the London Boroughs in meeting the requirements of the Planning Policy for Traveller Sites, at the end of its implementation period on 31 March 2013.

This is an update of an interim planning policy survey finalised by the London Gypsy and Traveller Unit in October 2012. The scope of this report is to offer evidence on the slow and fragmented implementation of the Planning Policy for Traveller Sites and analyse the justifications given by the Boroughs for not meeting its requirements.

Since the adoption of the PPTS, LGTU has been gathering information on the Boroughs' activity regarding provision for the Gypsy and Traveller communities in London. This evidence has been collected from the Boroughs existing and emerging key planning policy documents: Core Strategies, Site Allocations DPDs, Development Management DPDs, Housing Strategies and Annual Monitoring Reports. In addition, LGTU has been engaging with a number of local authorities and taking part in public consultations.

2. Main findings

The Boroughs' planning policies have been assessed against the three main requirements of the Planning Policy for Traveller Sites:

- To be based on a robust accommodation needs assessment
- To set pitch targets over the Local Plan period to meet this need
- To identify and update annually a 5-year supply of deliverable sites

The chart below aggregates all the collected evidence across the 33 London Boroughs. The progress made by each local authority is colour coded in the first three columns to indicate:

- Red – requirement not met
- Amber – work in progress
- Green – requirement met

The following columns indicate the current stage of development of each Borough's Local Plan. The acronyms stand for the document titles, as explained below.

- CS – Core Strategy
- SA DPD – Site Allocations Development Plan Document
- DM DPD – Development Management Development Plan Document
- SALP – Site Allocations Local Plan
- GT DPD – Gypsy and Traveller Development Plan Document

A detailed database expanding on the Boroughs' activity in meeting the requirements of the Planning Policy for Traveller Sites is included in Annex A of this report.

Table 1 Assessment against main requirements of the Planning Policy for Traveller Sites

Borough	GTANA	Targets	Land supply	Adopted DPDs	Research Stage	Consultation Stage	Examination Stage
Barking and Dagenham				CS 2010, SA 2010			
Barnet				CS, DM DPD 2012			
Bexley				CS 2012	DPAS LP		
Brent				CS 2012, SA 2011	DM DPD		
Bromley					Local Plan	Options and preferred strategy	
Camden				CS 2010			SA DPD- Jan 2013
City of London				CS 2011	Local Plan		
Croydon				Strategic Policies (approved by SOS)	Detailed Policies		
Ealing				CS 2012			DS and DM June 2013
Enfield				CS 2010			
Greenwich					CS with DM	CS with DM	
Hackney				CS 2010		SA DPD	
Hammersmith and Fulham				CS 2011			
Haringey				Local Plan 2013	SA DPD , DM DPD	DM DPD until 10 May 2013	
Harrow				CS 2012			SA DPD Jan 2013
Havering				CS 2008			GT DPD Apr 2013
Hillingdon				Local Plan 1: Strategic Policies	Local Plan 2: SA, DM		
Hounslow					Local Plan	expected May 2013	
Islington				CS 2011			SA DPD Jan 2013
Kensington and Chelsea				CS 2010	CS Review		
Kingston				CS 2012	GT DPD		
Lambeth				CS 2011		Draft Local Plan until 26 April 2013	
Lewisham				CS 2011	GT Local Plan	GT Local Plan June 2013	SALP Jan 2013
Merton				CS 2011		SA DPD	
Newham				CS 2012			
Redbridge				CS 2008	CS Review		
Richmond				CS 2009	SA DPD	expected summer 2013	
Southwark				CS 2011			
Sutton				CS 2009			
Tower Hamlets				CS 2010			
Waltham Forest				CS 2012	DM DPD		
Wandsworth				CS 2010	Local Plan Review	Local Plan Review May 2013	
Westminster				CS 2011	CS NPPF Review		

The evidence gathered so far indicates that the patterns of compliance are extremely uneven across the London Boroughs. In the one-year implementation period of the Planning Policy for Traveller Sites, only two Local Authorities have submitted for examination Local Plans that include Gypsy and Traveller site allocations to meet a proportion of the identified need.

Most of the Boroughs are accepting the 2008 London Gypsy and Traveller Accommodation Needs Assessment figures as evidence of need or are currently undertaking new needs assessments.

With regards to the identification of a 5-year land supply, only two Boroughs have made allocations for Gypsy and Traveller sites. However, in both cases these are existing sites with lapsed planning permission, which have been allocated as permanent sites.

It should be noted however, that only two Local Plans have been adopted within the implementation period (Haringey and Hillingdon Local Plans), and neither include the required land supply.

At the moment, 26 Boroughs are preparing new Local Plans to meet the requirements of the NPPF and PPTS. The emerging Local Plans are at various stages of development, most of them in the early phases of research and consultation, as indicated in the chart.

Only 6 Local Plans have been submitted for examination between March 2012 and March 2013.

The Planning Inspectors have raised a number of issues regarding the examined plans' compliance with the Planning Policy for Traveller Sites. Details of these examinations are presented in the following paragraphs.

- **Camden**

The Examination in Public on the Camden Site Allocations DPD took place between 16 and 23 January 2013. Prior to the Hearings, the Inspector raised a number of questions regarding the assessment of future Gypsy and Traveller accommodation needs required by the PPTS and how this will fit into the Local Development Scheme. As a result, the Council has committed to conduct a new GTAA during 2013 and review the SA DPD to incorporate Gypsy and Traveller site allocations. These modifications to the DPD have been subject to public consultation until the 26th of April 2013.

- **Havering**

The Examination in Public on the Havering Gypsy and Traveller DPD took place on the 9-11th of April 2013. The two hearings sessions addressed issues such as the robustness of the accommodation needs assessment, the capacity of the Plan to address future need, the soundness of the site allocations and the Duty to Cooperate. A site visit was conducted on the third day of the Examination in Public. The Inspector's report is expected in the following months.

- **Lewisham**

The Hearings on the Site Allocations Local Plan took place on 17-18th of January 2013. LGTU participated in the session addressing Gypsy and Traveller site provision and raised concerns regarding the removal of a site allocation from a previous version of the Plan, the consistent failure to provide a replacement for the Thurston Road site closed in 2007 and the unwarranted delays in the proposed Local Development Scheme. The Inspector raised a number of questions regarding the Council's preferred options for progressing this work, stressing the unjustified length of the timetable for producing a separate Gypsy and Traveller DPD. Following the Examination and the Inspector's report, the Council is currently in the early stages of consultation on a Gypsy and Traveller Sites Local Plan which is expected to be adopted by January 2015.

- **Ealing**

The Ealing Development Sites DPD and Development Management DPD are currently under examination, with hearing sessions scheduled to take place in June 2013. The submitted plans do not make any provision for Gypsies and Travellers. The Inspector has raised a set of initial questions regarding the required accommodation needs assessment and the timescale for producing this evidence. These issues have been taken forward in the Inspector's Matters and Questions for Examination, published on the 4th of April 2013.

3. Borough summaries

This section presents the activity of several Boroughs in which some progress has been made to meet the Planning Policy for Traveller Sites requirements, or where the policy approach has given rise to concerns.

Camden

Camden is the only local authority in London that applied for Gypsy and Traveller site funding through the Homes and Communities Agency. The Council has secured £750,000 to build 10 new pitches.

However, the Site Allocations DPD examined in January does not bring forward the required land supply. The Council claims that the land searches conducted so far have been unsuccessful. LGTU together with a local Traveller activist have submitted several site proposals, which will be discussed at a future liaison meeting with Camden planning officers.

Alongside the land search, Camden is currently conducting a new accommodation needs assessment for Gypsies and Travellers, as required by the Inspector who examined the Site Allocations DPD.

Hackney

Although there is a commitment to meet the full accommodation needs of Gypsies and Travellers in the Borough, the Draft Site Allocations DPD published in August 2012 did not identify the required land supply. During the consultation period, LGTU submitted a list of 10 site proposals which were analysed in more depth during a meeting with Hackney planning officers in February 2013. While the Hackney planning representatives agreed to undertake a series of actions to explore the possibility of allocating some of the sites for Gypsy and Traveller pitches, there has been no progress on these inquiries so far. The Council is expecting to submit the Site Allocations DPD for examination in Autumn 2013.

Havering

The Gypsy and Traveller Sites DPD has been subject to examination since December 2012. The document identifies a large number of existing sites which are currently unauthorised or have an expired planning permission and a private land supply for an additional 17 pitches. These allocations would only meet existing demand, rather than future need. An update to the 2004 Havering Gypsy and Traveller Needs Assessment undertaken in 2010, estimates a future need for 40 additional pitches in the Borough. However, the DPD does not set the required targets to meet this need. The examining inspector has raised this issue following the Examination in Public, together with concerns regarding the deliverability of the sites. The Council was allowed until the 19th of May 2013 to revise this policy approach, otherwise the DPD will be considered unsound.

Harrow

The Site Allocations DPD was subject to an Examination in Public in January 2013. The document makes an allocation for 3 Gypsy and Traveller pitches on an existing

site with lapsed planning permission, in order to meet the target set in the 2012 Core Strategy. It is also mentioned that the future needs of Gypsies and Travellers will be addressed in a replacement Housing Strategy.

Lewisham

Following the closure of the only Gypsy and Traveller site in the Borough in 2007, Lewisham has conducted several searches in order to find a replacement site. The preferred version of the Site Allocations DPD published in 2010 identified a site to meet the need of the 5 displaced households, but this was subsequently removed due to the findings of a technical report on accessibility. Since then, Lewisham has conducted a new Gypsy and Traveller Accommodation Needs Assessment in 2011 and commissioned a land search which started in September 2012 and was due to be finalized by December 2012. This work was not completed before the SALP Examination in Public hearings in January 2013, but it is expected to inform a separate Gypsy and Traveller Local Plan. According to the Council's LDS, the first consultation on the site list will take place in July/August 2013.

Merton

The Draft Sites and Policies DPD published for consultation in January 2013 does not make any provision for Gypsies and Travellers on the grounds that the low level of need can be met through pitch turnover. The assumptions made in this document are based on an accommodation needs assessment conducted in 2011 as part of a local event organised specifically for Gypsies and Travellers. This research does not take into account the requirement to assess need on a cross-authority basis and presents several inconsistencies in methodology.

Wandsworth

The Site Specific Allocations DPD adopted in February 2012 does not identify a land supply for Gypsy and Traveller sites, although an earlier version of the document did include a site allocation. This was removed due to the London Plan policy emerging at the time, which did not impose pitch target requirements on the Boroughs. A Gypsy and Traveller needs assessment was conducted as part of the 2012 Wandsworth SHMA, reporting a low level of need that will be met through pitch turnover. However, the research presents several inconsistencies and does not demonstrate the Council has met the Duty to Cooperate in assessing needs in conjunction with neighbouring Boroughs.

Islington

The Islington Site Allocations DPD examined in public in January 2013 does not make any provision for Gypsies and Travellers on the grounds that the need for new pitches over the plan period is zero. However, the Core Strategy adopted in 2011 recognises a need for 3 pitches by 2017 to accommodate Gypsy and Traveller households currently living in bricks and mortar. There is also a commitment from the Council to identify sites in the Site Specific Allocations document or to work sub-regionally to secure provision. There is no evidence that the Council has met the Duty to Cooperate or worked towards implementing the Core Strategy policy in producing the Site Allocations DPD. LGTU raised these issues during the consultation on the Main Modifications to the SA DPD.

4. Analysis of findings

This section of the report provides more in depth observations of how the key principles of the Planning Policy for Traveller Sites are being translated into local planning approaches across London. It aims to signal the main problems and inconsistencies around:

- Understanding and addressing the full need of Gypsy and Traveller communities
- Allocating land for Gypsy and Traveller sites
- Meeting the Duty to Cooperate
- Collaborating with Gypsy and Traveller communities and support organisations in producing Local Plans

Gypsy and Traveller Accommodation Needs Assessments

Both the National Planning Policy Framework and Planning Policy for Traveller Sites require Local Plans to be based on sound and robust evidence. In what regards Gypsy and Traveller accommodation needs assessments, the DCLG 2007 GTANA Guidance requires local authorities to give equal weight to the needs of Gypsies and Travellers living in bricks and mortar housing against their traditional way of life.

In conformity with these requirements, the 2008 London GTANA identifies an inclusive level of need for each Borough. The findings of this research cover the period between 2007 and 2017. Since the study was conducted, only 3 pitches have been granted planning permission, meaning that the need has not decreased substantially.

However, a large number of Boroughs fail to recognise the maximum figure of need reported in the 2008 GTANA. Following the adoption of the NPPF and PPTS, local authorities producing new Local Plans have been commissioning new GTANAs to update their evidence base. In cases where these have been completed, such as Lewisham, Wandsworth and Merton, the identified need is much lower than either of the GTANA figures.

A number of concerns can be raised regarding this approach. First of all, undertaking new studies adds unnecessary delays to the plan making process, while the backlog of need remains unmet. Secondly, the lack of collaboration between Boroughs and the lack of a common research methodology result in a poor understanding of the full accommodation needs of Gypsy and Traveller communities.

Finally, it should be noted that there is no systematic monitoring mechanism in place for Gypsy and Traveller accommodation needs, as there is for conventional housing needs. A recent survey conducted by LGTU found that only 15 Boroughs have site waiting lists, but their maintenance and accessibility vary widely.

Land allocations for Gypsy and Traveller sites

While over two thirds of the London Boroughs are currently producing Local Plans comprising site allocations, provision for Gypsies and Travellers remains largely unaddressed.

Harrow and Havering are the two Boroughs that put forward a number of site allocations which have been recently subjected to examination. In both cases, these are existing Gypsy and Traveller sites with lapsed planning permission, rather than a new land supply, and only cover a proportion of the current need. Bromley's Local Plan Options and Preferred Strategy document provides a similar approach, identifying a number of existing sites in the Green Belt that would allow for extensions. Merton and Wandsworth expect that the identified need will be met through pitch turnover on their existing sites.

The rest of the Boroughs justify their failure to identify the required land supply through claims such as high cost and unavailability of urban and suburban land, Green Belt development constraints and incompatibility with neighbouring land uses. However, residential development site allocations are progressed through all of these DPDs in order to meet the housing targets imposed by the London Plan. This consistent pattern indicates that Gypsy and Traveller provision is not equally prioritised and is not treated as a strategic policy issue in conformity with regional and national requirements.

Duty to Cooperate

As defined in the NPPF paragraphs 178-181 and throughout the Planning Policy for Traveller Sites, the Duty to Cooperate is a requirement to work jointly with neighbouring local authorities on strategic issues. In what regards Gypsy and Traveller site provision, this entails effective collaboration in assessing accommodation needs, setting pitch targets and identifying a supply of land where development constraints are identified.

The London Plan does not provide regional coordination mechanisms for Gypsy and Traveller provision as it does for conventional housing, but rather expects Boroughs to organise sub-regionally to meet the national planning policy requirements.

However, the findings of this report show that the Duty to Cooperate on the issue of Gypsy and Traveller provision is largely overlooked across the London Boroughs. None of the Boroughs who have conducted new accommodation needs assessments (Havering, Merton, Wandsworth and Lewisham) have demonstrated a joint work approach. Where this matter has been raised as part of an examination, the Councils' responses were that they have not been approached by neighbouring authorities to undertake collaborative work.

Collaboration with Gypsy and Traveller communities and support organisations

The Planning Policy for Traveller Sites requires Local Authorities to engage effectively with Gypsy and Traveller community and support organisations from the early stages of conducting needs assessments to identifying potential sites. Similarly to the collaboration with neighbouring local authorities, this requirement is largely not met across London.

This collaborative approach is widely interpreted as meeting statutory consultation requirements. Only a small number of Councils (Havering and Merton) have engaged with the Gypsy and Traveller community in assessing their accommodation needs, while Hackney and Camden have been working together with the London Gypsy and Traveller Unit and local Traveller activists in researching potential sites.

5. Conclusions and recommendations

Given these issues, a number of areas should be further examined to facilitate the implementation of the Planning Policy for Traveller Sites.

- **Regional and sub-regional coordination**

The lack of regional and sub-regional mechanisms to ensure consistency across the London Boroughs in assessing need, setting pitch targets and identifying land for Gypsy and Traveller sites has resulted in a fragmented and uneven approach.

The Boroughs do not have a good understanding of what the Duty to Cooperate entails and consistently fail to treat Gypsy and Traveller provision as a strategic issue. This should be addressed in a similar way to conventional housing provision, using the structures that are already in place. In particular, the London Strategic Housing Land Availability Assessment should incorporate a mechanism for identifying land capacity for Gypsy and Traveller sites, given this is the main difficulty facing Local Authorities.

- **Monitoring need**

Accommodation needs assessments are useful in forecasting future need, but they are not an adequate mechanism for tracking how and when this is being met. In order to keep an up-to-date evidence base, Local Authorities would have to review their needs assessments periodically, undertaking lengthy and expensive research. In order to secure a primary source of evidence, Local Authorities should take a more systematic approach, which could include setting up waiting lists and pitch allocation policies that are accessible to Gypsies and Travellers across Borough boundaries.

- **Collaboration with Gypsy and Traveller communities and support organisations**

This Planning Policy for Traveller Sites requirement should be given the same weight and priority as the Duty to Cooperate in producing Local Plans. Gypsy and Traveller communities and representative organisations have a very good understanding of their accommodation needs and suitability of land, as well as local knowledge of potential sites. Local Authorities should develop a collaborative work approach to ensure the views of the community are well represented and to complement their own research.

- **Identifying deliverable sites**

The identification of a 5-year supply of deliverable sites is a priority issue and it is necessary for Local Authorities to devise strategies to overcome constraints that limit their range of site options. First of all, the criteria for assessing sites should not be overly restrictive and size thresholds should not be used in the research methodology. Secondly, Gypsy and Traveller sites should be given the same priority as other land uses. When potential sites are identified they should not be discarded on grounds of low viability and the possibilities of allocating them should be explored in conjunction with other Council departments. Given the development pressures in London, a more innovative approach can be taken in searching land for Gypsy and Traveller sites. A possible solution would be to integrate them within larger developments as part of mixed-use schemes. Councils should be pro-active in negotiating this type of provision with developers from the early stages of planning applications.

Annex A – London Boroughs PPTS Compliance – Monitoring Database

Borough	Needs assessment	Targets	Site allocations	Adopted DPDs	Emerging DPDs	Consultations
Barking and Dagenham	accept GTANA 4-12	no	no	CS 2010 ¹ ; SA 2010 ² ; Borough Wide Policies 2011 ³		
Barnet	accept GTANA 0-15	up to 15	no	CS ⁴ , DM DPD 2012 ⁵		
Bexley	own GTANA: 0	no	no	CS 2012 ⁶	DPAS LP ⁷	
Brent	accept GTANA up to 24	no	no	CS 2012 ⁸ , SA 2011 ⁹	DM DPD	
Bromley	no mention of GTANA	up to 25	3 options		Local Plan	Options and pref strategy - 15/04 ¹⁰
Camden	accept GTANA: 2-5	up to 5	seeking land for 10 pitches	CS 2010 ¹¹	SA (examined Jan 2013) ¹²	
City of London	accept GTANA: 0	no	no	CS 2011 ¹³	Local Plan	
Croydon	accept GTANA 6-15	10	no	Strategic Policies (approved by SOS 2012) ¹⁴	Detailed Policies	
Ealing	no mention of GTANA	no	no	CS 2012 ¹⁵	Devp Sites and DM DPD submitted to examination 25 Feb 13 ¹⁶	
Enfield	accept GTANA 0-2	no	no	CS 2010 ¹⁷		
Greenwich	no mention of GTANA	no	no		CS with DM ¹⁸	until 14 May 2013

Hackney	accept GTANA 13-34	no, but there is a commitment	no	CS 2010 ¹⁹	SA DPD ²⁰	
Hammersmith and Fulham	no mention of GTANA	no	no	CS 2011 ²¹		
Haringey	accept GTANA min: 4	4 by 2017	no	Local Plan 2013 ²²	SA DPD ²³ , DM DPD	DM DPD until 10 May 2013; SA DPD expected April 2013
Harrow	accept GTANA min: 3	3 by 2018	site for 3 pitches	CS 2012 ²⁴	SA DPD ²⁵ , DM DPD	
Havering	no mention of GTANA; own needs assessment:	14	14 new pitches + 44 suitable to get perm planning permission	CS 2008 ²⁶	GT DPD ²⁷	GT DPD examination 9 April
Hillingdon	accept GTANA in SHMA: 6-43	no	no	Local Plan 1: Strategic Policies ²⁸	Local Plan 2: SA, DM	
Hounslow	accepts GTANA 40-43	no	no		Local Plan ²⁹	expected May 2013
Islington	accepts GTANA 0-3	no	no	CS 2011 ³⁰	SA DPD ³¹	
Kensington and Chelsea	accepts GTANA 6-12	no	no	CS 2010 ³²	CS Review	
Kingston	no mention of GTANA	no	no	CS 2012 ³³	GT DPD ³⁴	
Lambeth	accepts GTANA max: 10 (CS 2011); new GTANA underway	10 in CS but reduced to 4 in Draft Local Plan	no	CS 2011 ³⁵	Local Plan ³⁶	Draft Local Plan until 26 April
Lewisham	no mention of GTANA	no	no	CS 2011 ³⁷	SALP ³⁸ , GT Local Plan ³⁹	GT Local Plan June 2013
Merton	Local needs assessment 2011	no	no	CS 2011 ⁴⁰	SA DPD ⁴¹	summer 2013
Newham	don't mention GTANA figures	no	no	CS 2012 ⁴²		

Redbridge	Local needs assessment 2012: 1	no	no	CS 2008 ⁴³	CS Review	
Richmond	accept GTANA 2-11	no	no	CS 2009 ⁴⁴	SA DPD	summer 2013
Southwark	no mention of GTANA	no	no	CS 2011 ⁴⁵		
Sutton	accept GTANA 8-13	no	no	CS 2009 ⁴⁶		
Tower Hamlets	no mention of GTANA	no	no	CS 2010 ⁴⁷		
Waltham Forest	accept GTANA min: 3	3 by 2017	no	CS 2012 ⁴⁸	DM DPD	
Wandsworth	CS accepts GTANA 3-10; SHMA 2012: 0	no	no	CS 2010 ⁴⁹	Local Plan Review	Local Plan Review May 2013
Westminster	GTANA 0	no	no	CS 2011 ⁵⁰	CS NPPF Review	

Key:

GTANA – 2008 London Gypsy and Traveller Accommodation Needs Assessment

CS – Core Strategy

SA DPD – Site Allocations DPD

DM DPD – Development Management DPD

LP – Local Plan

GT DPD – Gypsy and Traveller DPD

DPAS LP – Development Policies and Sites DPD

References

- ¹ **Barking and Dagenham Core Strategy** <http://www.lbbd.gov.uk/Environment/Documents/LDF/core-strategy-development-plan-jul-2010.pdf>
- ² **Barking and Dagenham Site Specific Allocations DPD** <http://www.lbbd.gov.uk/Environment/Documents/LDF/site-specific-allocations-dpd.pdf>
- ³ **Barking and Dagenham Borough Wide Policies DPD**
<http://www.lbbd.gov.uk/Environment/PlanningPolicy/LocalDevelopmentFramework/Documents/BoroughWideDevelopmentPoliciesDPDMar2011.pdf>
- ⁴ **Barnet Core Strategy** http://www.barnet.gov.uk/downloads/940162/core_strategy
- ⁵ http://www.barnet.gov.uk/info/940166/site_allocations/555/site_allocations
- ⁶ **Bexley Core Strategy** <http://www.bexley.gov.uk/CHttpHandler.ashx?id=10148&p=0>
- ⁷ **Bexley Detailed Policies and Sites Local Plan** <http://www.bexley.gov.uk/index.aspx?articleid=14882>
- ⁸ **Brent Core Strategy** http://brent.limehouse.co.uk/portal/planning/cspo/adopted_cs?pointId=1269942812468#section-1269942812468
- ⁹ **Brent Site Allocations DPD** <http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-27>
- ¹⁰ **Bromley Options and Preferred Strategy** http://bromley.objective.co.uk/portal/o_and_p_document?pointId=2195561
- ¹¹ **Camden Core Strategy** <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-/core-strategy/>
- ¹² **Camden Site Allocations DPD** <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/site-allocations-development-plan.en;jsessionid=7C944E17458966657440AD4498C3CBBA.node2>
- ¹³ **City of London Core Strategy** http://www.cityoflondon.gov.uk/NR/rdonlyres/C256AF24-22DE-4BDE-8417-9DB27EC09E5A/0/DP_PL_CityofLondonCoreStrategyDPDSeptember2011Reduced.pdf
- ¹⁴ **Croydon Strategic Policies**
<http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/868213/1114530/proposedsubmissioncorestrat.pdf>
- ¹⁵ **Ealing Core Strategy** http://www.ealing.gov.uk/downloads/download/1322/adoption_of_the_development_or_core_strategy
- ¹⁶ **Ealing Development Sites and Development Management DPD**
http://www.ealing.gov.uk/info/200921/local_plans/1491/development_sites
- ¹⁷ **Enfield Core Strategy** http://www.enfield.gov.uk/downloads/file/3329/the_enfield_plan-core_startegy_adopted_november_2010

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- ¹⁸ **Greenwich Core Strategy with Development Management Policies** <http://greenwich-consult.limehouse.co.uk/portal/planning/cs/proposedsubmission?pointId=2137658>
- ¹⁹ **Hackney Core Strategy** <http://www.hackney.gov.uk/Assets/Documents/Adopted-LDF-Core-Strategy-final-incchaptimagescov-Dec2010-low-res.pdf>
- ²⁰ **Hackney Site Allocations DPD** <http://www.hackney.gov.uk/site-allocations-dpd.htm>
- ²¹ **Hammersmith and Fulham Core Strategy**
http://lbhf.limehouse.co.uk/portal/core_strategy_adopted_oct_2011?pointId=1886664
- ²² **Haringey Local Plan** http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/local_plan_adoption.htm
- ²³ **Haringey Site Allocations DPD** http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/site-allocations-dpd.htm
- ²⁴ **Harrow Core Strategy** http://www.harrow.gov.uk/info/856/local_development_framework__policy/2337/core_strategy_2011/6
- ²⁵ **Harrow Site Allocations DPD**
http://www.harrow.gov.uk/info/856/local_development_framework__policy/2654/development_management_policies_area_action_plan_and_site_allocations_consultation/4
- ²⁶ **Havering Core Strategy** http://www.havering.gov.uk/Documents/Final_CS_and_DC.pdf
- ²⁷ **Havering Gypsy and Traveller Sites DPD** <http://www.havering.gov.uk/Pages/Services/Gypsy-and-Traveller-Sites-DPD.aspx?l1=100006&l2=200074>
- ²⁸ **Hillingdon Local Plan 1: Strategic Policies** <http://www.hillingdon.gov.uk/article/23501/Hillingdon-Local-Plan---Adoption-of-Part-1---November-2012>
- ²⁹ **Hounslow Local Plan** http://www.hounslow.gov.uk/index/environment_and_planning/planning/planning_policy/localplan.htm
- ³⁰ **Islington Core Strategy** http://www.islington.gov.uk/Environment/Planning/planningpol/local_dev_frame/pol_corestrat/
- ³¹ **Islington Site Allocations DPD**
http://www.islington.gov.uk/publicrecords/Documents/Environment/Pdf/ldf_pack/Autumn_2011/Site_Allocations_PS_low_res.pdf
- ³² **Kensington and Chelsea Core Strategy** <http://www.rbkc.gov.uk/planningandconservation/planningpolicy/corestrategy.aspx>
- ³³ **Kingston Core Strategy** http://www.kingston.gov.uk/proposed_adopted_core_strategy.pdf
- ³⁴ **Kingston Gypsy and Traveller DPD**
http://www.kingston.gov.uk/browse/environment/planning/planningpolicy/local_development_framework/gypsy_dpd.htm

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- ³⁵ **Lambeth Core Strategy** <http://www.lambeth.gov.uk/NR/rdonlyres/C04824A3-E7DE-4FC9-B04D-FCD97557BB9D/0/CoreStrategyAdoptionVersionJanuary20116December100311.pdf>
- ³⁶ **Lambeth Local Plan** http://www.lambeth.gov.uk/NR/rdonlyres/0A67B239-34DD-48A4-9652-A6CA3ACB2B9F/0/DraftLocalPlanFeb2013_FINALforwebpublication.pdf
- ³⁷ **Lewisham Core Strategy** <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyAdoptedVersion.pdf>
- ³⁸ **Lewisham Site Allocations Local Plan** <http://www.lewisham.gov.uk/myservices/planning/policy/LDF/site-allocations/Documents/SALPSubmissionVersionPart1.pdf>
- ³⁹ **Lewisham Gypsy and Traveller Local Plan** <http://www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Gypsy-and-Traveller-local-plan.aspx>
- ⁴⁰ **Merton Core Strategy** http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/2011-07-28_core_strategy_adopted.pdf
- ⁴¹ **Merton Sites and Policies DPD** http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd.htm
- ⁴² **Newham Core Strategy** <http://www.newham.gov.uk/NR/rdonlyres/09585585-7EE1-44BB-BB50-A7DD94017406/0/CoreStrategyAdoptedJanuary2012InterimVersion.pdf>
- ⁴³ **Redbridge Core Strategy** http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy__regeneration/local_development_framework.aspx
- ⁴⁴ **Richmond Core Strategy** http://www.richmond.gov.uk/core_strategy-3.pdf
- ⁴⁵ **Southwark Core Strategy** http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version
- ⁴⁶ **Sutton Core Strategy** <https://www.sutton.gov.uk/CHttpHandler.ashx?id=17558&p=0>
- ⁴⁷ **Tower Hamlets Core Strategy** http://www.towerhamlets.gov.uk/lgs/851-900/855_planning_consultation/core_strategy.aspx
- ⁴⁸ **Waltham Forest Core Strategy** <http://www.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf>
- ⁴⁹ **Wandsworth Core Strategy** http://www.wandsworth.gov.uk/downloads/file/3674/core_strategy_adopted_version_october_2010
http://www.wandsworth.gov.uk/downloads/file/3674/core_strategy_adopted_version_october_2010
- ⁵⁰ **Westminster Core Strategy** http://transact.westminster.gov.uk/docstores/publications_store/Core_Strategy_Adopted_26_Jan_2011.pdf



Planning for Traveller sites in London

What are the Boroughs doing?

London Gypsy and Traveller Unit

October 2012

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

This report was produced by Bernard Bourdillon and Ilinca Diaconescu.

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 through consultation meetings on both the replacement London plan and the 'Minor' Alteration. This is evidenced by the numbers of submissions from Gypsies and Travellers.
- 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 those on the site to be relocated because of Crossrail, as well as working 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.

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1. Executive summary

Introduction

The aim of this report is to show the lack of progress registered among the London Boroughs in addressing Gypsy and Traveller accommodation needs, evidenced through a review of their most recent planning and housing policies and Annual Monitoring Reports.

The findings of this report should be considered in the context of a consistent failure to provide new Gypsy and Traveller sites in London over the last 18 years and a significant reduction by 15% in the number of sites. Currently, over 80% of London's Travellers live in brick and mortar housing, against their will and traditional lifestyle.

Policy context

Boroughs are required by national policy (Planning for Traveller Sites, DCLG 2012) to assess need for Gypsy and Traveller accommodation, set pitch targets accordingly, identify and update a 5 year supply of deliverable sites by March 2013. They are also required to demonstrate active and continuous collaboration with neighbouring planning authorities and other public bodies on the issue of meeting Gypsy and Traveller needs through their Local Plans, in order to fulfill their Duty to Cooperate.

Providing Gypsy and Traveller sites is a strategic issue and the community considers London as a single housing area, therefore the Boroughs need strong regional coordination and benchmarks. These are completely missing from the London Plan, which puts undue emphasis on the Localism tenets and passes all responsibility to the Boroughs.

Key findings

The survey has found that while there is a reasonable general coverage of Gypsy and Traveller issues in the Boroughs' Core Strategies in terms of protecting existing sites and setting criteria for new provision, there is a consistent lack of commitment in setting clear targets for future provision and a proven failure to build sites.

- Only 11 Boroughs have set targets for delivering additional pitches to meet the need identified in the 2008 London Gypsy and Traveller Accommodation Needs Assessment (GTANA)
- No pitches have been built in London at least since the 2008 London GTANA
- Only 1 Borough (Kingston) has given permanent planning permission for 3 additional pitches as an extension to an existing site

The Boroughs also fail to recognise the urgency of need for Gypsy and Traveller provision, given that allocating land for sites in Development Plan Documents is a lengthy and technically complex process, often inaccessible to the Traveller community.

- Only 8 Boroughs have completed their Site Allocations DPDs so far
- Only 1 Borough (Harrow) has identified land suitable for a Gypsy and Traveller site that will provide 3 pitches.

Why the Boroughs are failing to deliver Gypsy and Traveller sites

The Boroughs give various explanations for their shortcomings. Most of the Boroughs were preparing their Core Strategies while the London Plan was being altered in 2010-2011, which involved a lot of uncertainty regarding the requirements to set borough specific targets. This was used as a justification by the Boroughs to have a loose approach in their policies. When the targets were withdrawn altogether from the London Plan, there was no obligation for the Boroughs to set their own targets.

The other justification given by the Boroughs for failing to meet the accommodation needs of Gypsies and Travellers is the shortage and high cost of suitable land. Sites are usually identified in the Boroughs' Site Allocations Development Plan Documents, according to criteria set out in their Core Strategies. These criteria are based on national guidance (ODPM Circular 1/2006), but the Boroughs add further constraints which indicate that Gypsy and Traveller provision is not a priority. A frequent example is excessive emphasis on the protection of local character and residential amenity, which suggests that Traveller sites are considered inappropriate or even harmful.

However, under new national planning policy (Planning Policy for Traveller Sites), the criteria are more flexible. The sites should be sustainable economically, socially and environmentally, should have access to healthcare and education, be in peaceful co-existence with the surrounding settled community and not be situated in areas of high flood-risk.

Targets and progress

The following table summarises the progress made by each Borough in setting targets and delivering pitches in order to meet the need identified in the 2008 London GTANA.

Borough	GTANA estimated need for additional pitches 2007-2017 (minimum-maximum)	Target set by Boroughs	AMR progress (March 2011)
Barking and Dagenham	4-12	0	0
Barnet	0-15	15	0
Bexley	2-46	0	Not mentioned
Brent	14-21	0	Not mentioned
Bromley	29-119	0	1 site given temporary permission
Camden	2-5	2-5	0
City of London	0-0	0	Not mentioned
Croydon	10-19	10	0
Ealing	11-64	0	0
Enfield	0-2	0	No 2010/2011 AMR
Greenwich	22-45	0	0
Hackney	13-34	0	0
Hammersmith and Fulham	0-6	0	0
Haringey	6-58	4	0
Harrow	0-16	3	0
Havering	17-23	0	0
Hillingdon	6-43	0	0
Hounslow	6-15	0	0
Islington	0-3	0	0
Kensington and Chelsea	6-12	6-12	0
Kingston	3-16	0	3 additional pitches granted permanent permission
Lambeth	4-10	10	0
Lewisham	5-19	5	0
Merton	4-16	0	Not mentioned

Newham	10-19	0	0
Redbridge	5-17	0	0
Richmond	4-14	2-11	0
Southwark	12-17	0	0
Sutton	8-13	0	No 2010/2011 AMR
Tower Hamlets	25-40	0	Not mentioned
Waltham Forest	2-8	3	0
Wandsworth	3-10	10	0
Westminster	0-0	0	0
Total (2008)	226-703	67-88	
Final revised total	811		

During the consultation on the Replacement London Plan, the Mayor reduced the London-wide pitch targets once and finally removed them altogether.

Draft Replacement London Plan (Oct 2009)	538
DRLP First Minor Alteration (Mar 2010)	238
DRLP Second Minor Alteration (Sep 2010)	0
London Plan Revised Early Minor Alterations (June 2012)	0

Concluding remarks

- The two minor alterations to the Replacement London Plan resulted in most Boroughs delaying to set pitch targets in their Core Strategies.
- While most of the Boroughs take into consideration the London GTANA estimates of need for additional pitches, they do not appear to recognise the urgency of this need. The lengthy process of producing and adopting Development Plan Documents, which are required to allocate sites, can be regarded as a barrier to prompt delivery.
- Furthermore, the criteria for new sites set out by the Boroughs provide further barriers to finding land (e.g. compatibility with the character of neighbouring residential land).
- There is no monitoring system in place for tracking pitches that are being lost or redeveloped. Only 1 Borough includes indicators in their Annual Monitoring Report that refer to loss of sites.

2. Borough profiles

Barking and Dagenham

There is currently one Gypsy and Traveller site in the Borough, located at Eastbrookend Country Park. The Core Strategy does not address Gypsy and Traveller issues. The Borough Wide Development Policies DPD protects the existing site and sets out criteria for additional sites. The Annual Monitoring Report for 2010/2011 states that no new pitches have been developed in the review year. There is no local Gypsy and Traveller housing needs assessment. The GTANA estimated need between 2007-2017 is of 4-12 residential pitches.

Barnet

There are currently no Gypsy and Traveller sites in Barnet. The Borough has not adopted a Core Strategy yet, and the Submission version of the document only states that the long term needs of Gypsies and Travellers will be addressed in the Site Allocations DPD, which is still being developed after site suggestions consultations that took place in 2010. The Annual Monitoring Report for 2010/2011 only states that no pitches were developed in the review year. While the Housing Strategy mentions the GTANA findings, it does not set targets for meeting the identified need. The GTANA estimated need between 2007-2017 is of 0-15 residential pitches.

Bexley

There are currently three Gypsy and Traveller sites in Bexley, located at: Jenningtree Way in Belvedere, Willow Walk in Crayford and Powerscroft Road in Sidcup. Despite the London GTANA identifying a need for between 2 and 46 new pitches in the borough of Bexley, Bexley's completion of a more recent and (they claim) more effective study shows that they in fact need no new pitches, and have even been able to reduce the number of pitches in their borough in recent years without it affecting demand. Since they have done their own fairly recent research and found that they don't need more pitches, it seems unlikely that any will be developed in Bexley.

The Bexley Core Strategy clearly outlines the borough's belief that they don't currently need additional pitches because one of their existing pitches is in such a low state of demand that it was recently reduced in size. However, they state that according to national requirements, if they must develop additional sites, they will do so in future planning documents, the implication being that unless they are required to do so, they will not.

Brent

There is currently one Gypsy and Traveller site in the Borough, located at Lynton Close. The Core Strategy protects this site and sets out criteria for additional sites. The Development Plan Documents do not identify suitable sites for future development. While the Housing Strategy mentions it has taken into consideration the GTANA requirements for additional pitches, it does not have a policy addressing Gypsy and Traveller accommodation. The GTANA estimated need for 2007-2017 is of 14-21 additional residential pitches.

Bromley

There are currently 4 Gypsy and Traveller sites in the Borough, two of which are run by the Council. The Borough is still developing their Core Strategy and Development Plan Documents.

The Gypsy and Traveller community is described in detail, but no planning policies to address their needs are outlined in the Local Development Framework. The Annual Monitoring Report for 2010/2011 mentions that one site was given temporary planning permission. In terms of housing policy, the Council does not have a Housing Strategy uploaded on the website and has not undertaken a local housing needs assessment.

Camden

There are two Gypsy and Traveller sites located at Carol Street and Castlehaven Road, as well as a plot for Travelling Showpeople at the North Fairground. Camden recognises the need for 2-5 additional pitches identified in the GTANA and sets it as a target for future provision in its Core Strategy.

Camden is the only London Borough to have secured £700,000 funding from the Homes and Communities Agency in January 2012 to support the delivery of 10 additional pitches¹. However, the Site Allocations Submission DPD published in March 2012 states that no sites have been found at this stage and provision will be made through planning applications and future policy reviews.

City of London

There are currently no Gypsy and Traveller sites in the Borough and the Core Strategy is the only planning policy document to mention them, stating that the London GTANA found there is no need for Gypsy and Traveller accommodation.

Croydon

There is currently one Gypsy and Traveller site in the Borough at Lathams Way. Croydon council's policy approach to gypsies and travellers is relatively good. The criteria for suitable gypsy sites are clearly outlined and there is detailed reference to the GTANA 2008.

Most significantly though, there is a specific target regarding the provision of additional pitches: 'The Council will seek to deliver ten additional Gypsy and Travellers pitches in the borough by 2021'. But no documents on the web site indicate how this target was derived. Croydon council recognise here that it is their responsibility to produce a needs assessment for gypsies and travellers. They also appreciate that there is an immediate need for additional pitches for gypsies and travellers.

Ealing

There is currently one Gypsy and Traveller site in the Borough, protected in the Core Strategy. Due to an apparently short waiting list for that site and the effectiveness of the borough's housing support team in placing gypsies and travellers in brick and mortar accommodation, the Core Strategy and Annual Monitoring Report for 2010/2011 evaluate that there is no need for additional pitches to be provided.

Most notably, the Housing Strategy claims it will carry out a local study of need, but there is no evidence of this on the Ealing website.

Enfield

There are currently no Gypsy and Traveller sites in the Borough. The Core Strategy references the GTANA findings, stating there is no Gypsy and Traveller accommodation need to justify the allocation of sites. However, the Core Strategy provides a set of criteria for new sites.

Greenwich

There is currently one Gypsy and Traveller site at Thistlebrook, providing 40 residential pitches,

¹ http://www.homesandcommunities.co.uk/sites/default/files/our-work/tpf_allocations_january2012.csv

which is safeguarded in the Core Strategy. New sites are to be identified in the Site Specific Allocations DPD according to London Plan requirements. Prior to the release from the obligation to follow the 2008 GTANA results, they seem to have been planning to look into additional pitch sites, but, per their most recent Annual Monitoring Report, appear to be waiting for further policy guidance from central government. In the meantime, their stated obligation is to maintain current pitches.

Hackney

There are currently 5 Gypsy and Traveller sites in the Borough out of which 3 are permanent (St. Theresa's Close, Ruby Close and Abbey Close), and 2 are temporary (St Anthony's Close, Palace Close). Hackney's overall approach to gypsies and travellers is perhaps slightly more extensive than some other boroughs; however there is a lack of certainty and concrete targets. The Core Strategy clearly establishes the shortage of pitches as a significant and immediate problem and outlines the criteria of suitable new sites. However, there are no specific targets for a net increase in pitches nor is there an attempt to begin the process of new site identification and development. The Annual Monitoring Report (2010-2011) appears to provide a comprehensive review of the current situation regarding gypsies and traveller sites. There is no mention of gypsy and travellers in the housing needs assessment (2009).

Hammersmith and Fulham

There is currently one Gypsy and Traveller site, provided jointly with the Royal Borough of Kensington and Chelsea. The Core Strategy protects this site, sets out criteria for new sites and commits to undertake improvement works in 2011/2012. However, the Strategy stresses the difficulty of providing Gypsy and Traveller sites as they could cause disturbance to neighbouring residents. In terms of housing policy, the Borough's Housing Strategy does not mention Gypsy and Traveller accommodation, however the local housing market assessment acknowledges the GTANA estimated need for additional pitches.

Haringey

There are currently two Gypsy and Traveller sites in the Borough. The Core Strategy has not been adopted yet, but the Proposed Submissions Version protects the existing sites and provides criteria for new ones. The Strategy acknowledges the GTANA requirement of 4 additional pitches until 2017 and states that new sites will be identified in the Site Allocations DPD. The Development Plan Documents are still being prepared, however, the consultation versions do not mention Gypsy and Traveller sites. The Housing Strategy does not mention Gypsy and Traveller accommodation.

Harrow

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy sets a target to provide 3 additional pitches by 2017/2018 in accordance with the GTANA findings and provides criteria for new sites. While the local Housing Needs Survey and the sub-regional Strategic Housing Market Assessment do not mention Gypsy and Traveller needs, the Housing Strategy states that a separate Gypsy and Traveller strategy will seek to identify suitable sites to accommodate the need identified in the GTANA.

Havering

There are no council owned sites in the Borough and a significant number of Gypsy and Traveller families live on sites that are unauthorised or have temporary or expired planning permissions. The Core Strategy sets out a list of criteria for new sites and references a Gypsy and Traveller housing needs assessment carried out in 2004. A Gypsy and Traveller DPD was

submitted in March 2012, providing an assessment of current need and identifying sites that will accommodate this need. The document states that 62 pitches will be provided, however, only 17 of them are new developments while the other 45 are located on sites that are unauthorised or have temporary planning permission.

Hillingdon

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy protects this site and sets out criteria for new sites. Targets are to be set in accordance with London Plan requirements. The local Housing Market Assessment acknowledges the GTANA findings.

Hounslow

There is currently one site in the Borough, the Hartlands Traveller Site. Hounslow has a dedicated policy H9 Gypsy and Traveller Provision which only recognizes the future accommodation needs of Gypsies and Travellers and mentions the sub-regional GTANA requirement for additional pitches.

Islington

There are no Gypsy and Traveller sites in the Borough. It is clear the needs of gypsies and travellers are not high priority within Islington council's planning and housing strategies. There is no specific target for net additional pitches in the core strategy. Most worryingly, gypsies and travellers are almost completely ignored in the boroughs housing policies. This is perhaps due to the borough's assessment that there are zero gypsies and travellers residing in the area. Islington's policies do not exude a positive or active approach towards gypsies and travellers.

The inclusion of the phrase "nor has there been any introduced in the 2011 London Plan" (section 5.92) is interesting. The emphasis is supposed to be on the borough to set individual targets assessing their specific needs. The fact that no targets exist at the London level should not be used as justification for a lack of targets at the borough level.

Kensington and Chelsea

The Westway Traveller Site is managed in conjunction with Hammersmith and Fulham. The borough of Kensington and Chelsea seems somewhat ambivalent towards gypsies and travellers. Although they acknowledge the fact that the 2008 GTANA recommended additional pitches, they also cite the difficulties that they will encounter in developing these pitches, and the DPD that was to deal with this necessity and difficulty is still, hopefully, forthcoming. It looks as though Kensington and Chelsea were ready to comply with previous government's requirements for the development of additional pitches, but because of land scarcity in the borough, it's very possible that they will not develop pitches if left to their own devices.

Kingston

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy protects the existing site sets out criteria for new sites. It states that 3 pitches will be added and future targets will be provided in a Gypsy and Traveller DPD that is being produced. The Annual Monitoring Report mentions that planning permission was granted for the development of the 3 additional pitches. In terms of housing policy, the Borough's Housing Strategy acknowledges the GTANA requirements for additional pitches and gives an account of the budget spent on support for the Gypsy and Traveller community and improvement work on the existing site.

Lambeth

There is currently one site in the Borough, the Lonesome Depot, providing 15 residential pitches. The Core Strategy acknowledges the results of the 2008 London GTANA and sets a target to provide 10 additional pitches by 2025.

Lewisham

There are currently no Gypsy and Traveller sites in the Borough due to the redevelopment of the site at Thurston Road. The need to relocate the 5 pitches comprising this site is recognised in the Core Strategy, which sets out criteria for new sites and states that suitable sites will be identified in the Site Allocations Policy DPD. The DPD has not been adopted yet and while the 2010 Further Options version included an allocation for a Gypsy and Traveller Site at Church Grove, this was removed from the 2012 Submission version. The justification is not clear, but the document states that additional site search will take place. Lewisham commissioned a local Gypsy and Traveller Needs Assessment in 2011, which reports a lower accommodation need than the London GTANA.

Merton

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy protects the existing site and sets out criteria for new sites, which will be identified in future DPDs. The Strategy acknowledges the additional need identified in the GTANA, but also the need arising from the Council's waiting list. The Merton Strategic Housing Market Assessment only mentions the requirement to undertake a local Gypsy and Traveller needs assessment. The Borough's Housing Strategy states that a separate Gypsy and Traveller strategy is being prepared together with the community and other local partners.

Newham

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy sets out criteria for new sites and acknowledges the GTANA requirements, but does not set clear targets. Progress in providing these sites will be made in future DPDs. The housing needs assessment and housing strategy do not mention Gypsy and Traveller accommodation. An NHS/Joint Strategic Needs Assessment recognises the pressures facing the community, but does not make any policy recommendations.

Redbridge

There is currently one site in the Borough, at Forest Road, Fairlop. Redbridge's policies on Gypsies and travellers are definitely harder to find and at the very least are much more fragmented than some other London boroughs. The Core Strategy does not have a specific strategic policy solely dedicated to planning for Gypsies and travellers, however, the safeguarding of existing provision and criteria for new sites are addressed in the Borough Wide Development Policies DPD.

Richmond

There is currently one Gypsy and Traveller site in the Borough. The Core Strategy protects this site and acknowledges the GTANA requirement for 2-11 additional pitches. While it stresses the difficulty of finding suitable sites to accommodate these pitches, the Strategy states that they will be identified in a future Site Allocations DPD. The housing needs survey and sub-regional housing market assessment do not mention Gypsy and Traveller need. The Housing Strategy refers to Gypsy and Travellers briefly, including them in the client groups requiring additional housing support, but does not provide any specific policies.

Southwark

There are currently four Gypsy and Traveller sites in the Borough at Bridale Close, Burnhill Close, Ilderton Road and Springtide Close. Southwark council's planning approach to gypsies and travellers is quite good compared to some other London boroughs. The criteria for suitable sites are clearly outlined in the Core Strategy and there is a commitment to provide new sites in the future – although the official target is only the 'safeguarding existing gypsies and traveller sites'. The core strategy also includes a map of the four current gypsy and traveller sites.

Sutton

There are currently two sites in the Borough, one of them Council owned and the other private. The Core Strategy protects the existing sites and acknowledges the GTANA requirements for additional pitches. New sites to accommodate this need will be identified in a future Gypsy and Traveller DPD. The Strategy stresses these sites are intended to be affordable, thus Council owned or managed. The Annual Monitoring Report for 2010/2011 has not been uploaded on the Council website. The Housing Strategy acknowledges the GTANA.

Tower Hamlets

The site at Eleanor Street is being relocated to an adjacent area due to Crossrail Development. The Core Strategy safeguards this site and sets criteria for new sites which are to be identified in the Site and Placemaking DPD. This document has not been adopted yet, but the engagement version presents a list of potential sites which is eventually discarded with the justification that they did not accord with the vision for each area and proposed development.

Waltham Forest

There are currently two Gypsy and Traveller sites in the Borough, Folly Lane and Hale Brinks North, which are protected in the Core Strategy. The Council will seek to identify suitable sites accommodate 3 additional pitches by 2017 through the Site Allocations DPD, which is currently being prepared.

Wandsworth

There is currently one Council owned site in the Borough at Trewint Street, providing 12 pitches, which is safeguarded by the Core Strategy and Site Allocations DPD. Wandsworth is one of the few Boroughs that managed to identify suitable land for a new Gypsy and Traveller site in the Preferred Options version of their Site Allocations DPD. However, as a consequence of the removal of specific targets for provision from the London Plan, the allocation was withdrawn from the adopted version of the document.

Westminster

There are currently no Gypsy and Traveller sites in the Borough. Westminster claims to have zero need for and ability to provide Gypsy and Traveller accommodation. They cite high density and lack of available land space as their reasons for this, and refer to the 2008 GTANA as support. As such, their core strategy clearly states that they have no intention of developing permanent sites, though they do mention that temporary sites may become available because of other redevelopment works.

3. Policy survey

The following section provides detailed evidence from the Boroughs' planning and housing policies covering Gypsy and Traveller issues. The following documents have been reviewed for each Borough:

- Core Strategy (or Local Plan)
- Development Plan Documents: Site Allocation DPD, Development Management DPD and Gypsy and Traveller DPD if the Borough has produced one
- Annual Monitoring Report for 2010/2011
- Housing Needs Assessment
- Housing Strategy
- Other relevant studies and references

Barking and Dagenham

East sub-region

Core Strategy

Barking and Dagenham's *Core Strategy*² (July 2010) makes only one reference to Gypsy and Traveller sites in the Monitoring and Implementation Framework, where the delivery of additional pitches is an indicator/target under policy CM2 Managing Housing Growth.

Development Plan Documents

The *Borough Wide Development Policies DPD*³ (Mar 2011) protects the existing site at Eastbrookend Country Park and sets out criteria for new sites. The document predates the London Plan (July 2011), but it includes the presumption that need will have to be assessed locally. Therefore, the document states that the Council will use the London GTANA findings as a starting point for a local needs assessment.

POLICY BC3: GYPSIES AND TRAVELLERS ACCOMMODATION

The Council will safeguard the existing gypsy and traveller site at Eastbrookend Country Park.

Proposals for new gypsy and traveller sites, or extensions to the existing one, will only be permitted where:

- The proposed development would meet an identifiable local need which cannot be accommodated by existing provision.
- The site will not be isolated from the wider community and has ease of access to a range of leisure and community facilities (such as shops, schools and health facilities).
- The site will not be located in areas of high flood risk, including functional floodplains.
- The provision of adequate recycling facilities is catered for;
- Residential amenity will be safeguarded by minimising the potential for noise, movements and other disturbance to, from and within the site.
- The site does not detract from or damage the quality or character of open spaces.
- The site has safe access to and from the main road network and has satisfactory parking and turning space for all vehicles;
- The site will not detract from or damage historic or cultural sites or Conservation Areas.
- The site layout is appropriate in terms of the configuration of pitches, amenity buildings, hardstandings and open spaces.
- The site has appropriate means of enclosure and comprehensive landscaping.

² <http://www.lbbd.gov.uk/Environment/Documents/LDF/core-strategy-development-plan-jul-2010.pdf>

³

<http://www.lbbd.gov.uk/Environment/PlanningPolicy/LocalDevelopmentFramework/Documents/BoroughWideDevelopmentPoliciesDPDMar2011.pdf>

REASONED JUSTIFICATION

- 3.3.1 The provision of adequate and suitable accommodation for gypsies and travellers will help promote the peaceful and integrated coexistence among the residents of Barking and Dagenham. The Council has a statutory responsibility to ensure that the accommodation needs of gypsies and travellers are met.
- 3.3.2 Following national government announcements in the summer of 2010, there is no longer a regional requirement to set targets for Gypsy and Traveller pitch provision. In addition, the Government announced in September 2010 that it intends to revoke Planning Circular 01/06 and replace this with guidance outlining councils' statutory obligations. The Mayor of London is (as at September 2010), also proposing to remove regional targets for Gypsy and Traveller pitch provision. This is being taken forward as a minor alteration to the consultation draft Replacement London Plan and will be subject to examination in December 2010. **If the need for pitch provision is to be determined at the local level, the Council will use the Gypsy and Traveller Needs Assessment (GTANA) completed by the GLA in 2009 as a starting point for determining any additional need in the Borough. Where additional need is determined, this will be identified through a dedicated Gypsy and Traveller DPD.**
- 3.3.3 Until the additional need for pitches in the Borough has been established, any forthcoming windfall applications will be judged against the criteria contained in this policy.
- 3.3.4 This policy accords with London Plan Policy 3A.14 which requires development plan policies to protect existing gypsies and travellers sites, set out criteria for assessing proposals for new sites, and identify land for new sites where shortfalls occur.

The *Site Specific Allocations DPD*⁴ (Dec 2010) does not mention Gypsy and Traveller sites.

Annual Monitoring Report

The *AMR 2010/11*⁵ (Dec 2011) states only that no new Gypsy or Traveller pitches were developed and "no applications for gypsy and travellers were submitted".

Housing Needs Assessment and GTANA

Barking and Dagenham is covered by the *Strategic Market Housing Assessment for East London 2009/10* (Sept 2010) which reports the Borough level need for pitches given in the London GTANA (2008).

⁴ <http://www.lbbd.gov.uk/Environment/Documents/LDF/site-specific-allocations-dpd.pdf>

⁵ <http://www.lbbd.gov.uk/Environment/PlanningPolicy/LocalDevelopmentFramework/Documents/monitoring-report-1011-main.pdf>

Housing Strategy

The *Housing Strategy 2007-2010*⁶ (2007) was published before the GTANA survey was completed and refers to it as follows:

2.4 Equalities Impact

.....

In 2007, the Council in partnership with other local authorities across London are undertaking an accommodation needs survey for Gypsies and Travellers, **which will provide useful information** in meeting the accommodation needs and future demand for Gypsies and Travellers.

Other

There is a FAQ-style section of the website titled “Traveller Liaison”⁷ concerned strictly with what can be done about illegal encampments and how to contact the authorities.

6 <http://www.lbbd.gov.uk/Housing/Documents/HousingStrategy20072010.pdf>

7 <http://www.lbbd.gov.uk/housing/frequentlyaskedquestions/pages/travellerliaison.aspx>

Barnet

North sub-region

Core Strategy

The *Core Strategy Adoption Version*⁸ (September 2012) sets out criteria for new sites in Policy CS 4 and acknowledges the GTANA requirements for up to 15 Gypsy and Traveller pitches and up to 2 Travelling Showpeople plots as targets for delivery until 2017. Suitable sites will be identified in a future Sites Allocations DPD.

9.7 Gypsies and travellers and Travelling Showpeople

9.7.1 In March 2012 the Government published Planning Policy for Traveller Sites. Government policy requires Local Plans to set out criteria for the location of gypsy and traveller pitches and plots for travelling showpeople. This will help to guide the allocation of any sites/plots and to manage unexpected demand. To meet the long term needs of Gypsies and Travellers and Travelling Showpeople we will seek to identify appropriate sites through the Site Allocations DPD. The pan London Gypsies and Travellers Accommodation and Needs Assessment 2008 (GTANA) sets out a range of minimum to maximum pitch requirements for Barnet up to 2017 from zero to 15 pitches for Gypsies and Travellers and up to 2 plots for Travelling Showpeople. The council will work with sub-regional partners to ensure that the evidence base is reviewed. This may change the range of maximum to minimum targets set out above.

Policy CS 4 - Providing quality homes and housing choice in Barnet

4. Proposals for sites for Gypsies and Travellers and Travelling Showpeople must have regard to the following criteria:

- close proximity to a main road and safe access to the site with adequate space on site to allow for the manoeuvring of vehicles
- reasonable access to local shops and other community facilities in particular, schools and health care
- the scale of the site is in keeping with local context and character

Within the Site Allocations DPD we will seek to identify land to meet the long term needs of Gypsies and Travellers and Travelling Showpeople based on an evidence base of the range of pitches/plots required in Barnet.

⁸ http://www.barnet.gov.uk/downloads/940162/core_strategy

Core Strategy Monitoring Indicators

Net additional gypsy, traveller pitches and travelling showpeople plots - Deliver by 2017

- Up to 15 pitches for Gypsy and Travellers
- Up to 2 plots for Travelling Showpeople
- Baseline in 2010/11 is zero.

Development Plan Documents

The *Development Management DPD Adoption Version*⁹ (September 2012) mentions that Gypsy and Traveller sites and Travelling Showpeople plots are addressed in the Core Strategy Policy CS4.

The *Site Allocations DPD* is still being developed based on Site Suggestion consultations that took place in 2010¹⁰.

Annual Monitoring Report

The *AMR 2010-11*¹¹ states that no Gypsy and Traveller pitches were delivered in the review year.

Housing Needs Assessment and GTANA

Barnet is covered by the *Strategic Housing Market Assessment for North London 2009/10* (February 2011). This reports the London GTANA (2008) findings with the provision “these figures are only draft and are being actively challenged”.

The subsidiary *Local Area Report*¹² (Dec 2010) makes no mention of Gypsy and Traveller needs.

There is no borough-level GTANA.

⁹ http://www.barnet.gov.uk/downloads/940162/core_strategy

¹⁰ http://www.barnet.gov.uk/info/940166/site_allocations/555/site_allocations

¹¹ AMR 2010/11 <http://www.barnet.gov.uk/annual-monitoring-report-2010-1-january-2012.pdf>

¹² Local Area Report (2011) <http://www.barnet.gov.uk/shma-assessment-dec-2011.pdf>

Housing Strategy

The *Housing Strategy 2010-27*¹³ (March 2010) states:

Gypsies and travellers

A London-wide assessment of need for residential pitches found there are approximately 60 households from the gypsy and traveller communities living in conventional housing in Barnet and that there is no minimum requirement for providing pitches in the borough, but a potential need for 13 pitches based on households who would prefer to live on a gypsies and travellers site. The London Mayor has proposed that Barnet should provide 16 pitches based on this survey in his draft London Plan, and the council will seek to agree a final target with the Mayor based on evidence of need. This will be taken forward through Barnet's Local Development Framework.

¹³ Housing Strategy 2010-27 <http://www.barnet.gov.uk/housing-strategy-2010-2027.pdf>

Bexley

South East sub-region

Core Strategy

Bexley's *Core Strategy*¹⁴ (February 2012) protects the three existing Gypsy and Traveller sites while there is a demand for them and sets out criteria for new sites. The Bexley Gypsy and Traveller Needs Assessment that informs the Core Strategy indicates that there is no future need for additional sites.

Policy CS11 Gypsy and traveller accommodation

Bexley's existing provision for gypsies and travellers will be protected, while demand exists. The following considerations will particularly need to be taken into account in the determination of locations for future gypsies and travellers sites:

a) the site should comply with the requirements of other relevant policies, including policies that seek to protect development from flood risk and designated areas, such as metropolitan green belt from inappropriate development so as to preserve, conserve, enhance and promote Bexley's network of open spaces and waterways, biodiversity and geological assets;

b) any proposal for a new site should include provision for basic amenities and services, and in particular will be assessed in relation to its impact on:

- the character and appearance of the site and surrounding area;
- the living conditions of neighbouring occupiers; and
- the local highway network.

Policy CS11 justification

4.4.10 There are three main gypsy sites in the borough, which are located at: Jenningtree Way in Belvedere; Willow Walk in Crayford; and Powerscroft Road in Sidcup. There are no known new age travellers, organised groups of travelling show people or circus people travelling together as such, based in the borough. In recent years, Bexley has been characterised by low levels of unauthorised encampments and very low levels of demand at its Powerscroft Road site. This site currently has ten pitches and was redeveloped, with the number of pitches reduced due to lack of demand in 2001/02.

4.4.11 **Bexley's Gypsy and Traveller Accommodation Needs Assessment indicated that need was likely to be nil.** The London GTANA, however, although based on London wide findings rather than actual survey work, estimated a need of between 2 and 46 additional pitch requirements for Bexley. In meeting the requirements of Government policy and the London Plan (policy 3.8 i), the Council intends to work to meet identified needs, in co-ordination with neighbouring boroughs and districts as appropriate, within the first five years of the plan period.

4.4.12 In particular, any new gypsy and traveller sites will not be considered as suitable locations where development would be located in an area of flood risk (EA flood zones 2 and 3). Availability of government grant will be explored to assist with the maintenance and, where necessary, delivery of gypsy sites.

14 <http://www.bexley.gov.uk/CHttpHandler.ashx?id=10148&p=0>

4.4.13 In accordance with national requirements, specific sites will, as appropriate, be identified in future policy documents, such as a development plan document that deals with detailed sites and policies. Any further sites and planning applications will be considered against the criteria stated within this policy and any additional considerations will be set out in future policy documents, such as a development plan document that deals with detailed sites and policies.

Development Plan Documents

The draft Development Standards DPD and Site Specific Allocations DPD are due to be published in the late autumn of 2012.

Annual Monitoring Report

The Annual Monitoring Report 2010/2011¹⁵ does not mention Gypsy and Traveller provision.

Housing Needs Assessment and GTANA

Bexley is covered by the *South East London Strategic Housing Market Assessment 2009*, which. It makes no mention of Gypsy and Traveller needs.

The Bexley Strategic Housing Market Assessment¹⁶ (Jan 2010) does not address Gypsy and Traveller needs, stating that:

2. Policy Context and Guidance

The needs of Gypsies and Travellers are not detailed within the SHMA and are assessed within a separate study that will be published shortly.

Bexley was the only Borough not to participate in the London GTANA (2008), but it conducted its own Bexley GTANA¹⁷ (Sept 2009, but published late 2010), which argues that there is no need for pitches in the Borough. LGTU has produced an analysis of this survey highlighting its poor methodology and assumptions and concluding that 15 more pitches are needed¹⁸.

¹⁵ <http://www.bexley.gov.uk/CHttpHandler.ashx?id=9876&p=0>

¹⁶ This is taken from a report to the Local Development Framework Cabinet Advisory Group – 26th Jan 2010 <http://democracy.bexley.gov.uk/mgConvert2PDF.aspx?ID=14946> since the Assessment itself is not available on the website. This seems to be a habit with Bexley who did not release its GTANA till nearly a year after its supposed publication date.

¹⁷ <http://www.bexley.gov.uk/CHttpHandler.ashx?id=7805&p=0>

¹⁸ **Yet to be mounted on Igtu website**

Housing Strategy

The most recent strategy uploaded on the Bexley website, *Housing Strategy 2002-2006*¹⁹ makes a brief reference to Gypsy and Traveller needs:

Black and Minority Ethnic Community Need

There is also a significant population of travellers (some 1,000 families) in the Cray Valley, South East Bexley and North East Bromley. This group, a distinct ethnic minority, experiences high levels of social and economic deprivation, including high proportions of lone parents, high percentages of social services referrals, high birth rates, low educational achievements, low incomes and poor health. Recent support using a £219,000 Government grant enabled substantial improvements to be made to the travellers' site in Footh Cray.

Other

There is a small section on the Council's website²⁰ dedicated to helping traveller children in their studies.

¹⁹ <http://www.bexley.gov.uk/CHttpHandler.ashx?id=1290&p=0>

²⁰ <http://www.bexley.gov.uk/index.aspx?articleid=6031>

Brent

West sub-region

Core Strategy

The Core Strategy²¹ (adopted 2010) protects the existing site at Lynton Close and sets out criteria for new sites in Policy CP 22.

Policy CP 22

Sites For Nomadic Peoples

- A). The existing Lynton Close Travellers Site will be protected for its current use
- B). Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show people should:

Meet a need for such accommodation which is not being met in the Borough or elsewhere in London, whilst avoiding an over-concentration of such facilities in Brent in comparison to other boroughs.

- Be located on a site and in an area both environmentally acceptable for residential occupation and - where the prospective occupiers require – suitable for the undertaking of employment and entrepreneurial activities without detriment to adjacent occupiers' amenities.
 - Have acceptable road and pedestrian access and be accessible to local services and public transport.
 - Be suitably landscaped, with appropriate boundary treatment.
-

Nomadic Peoples

5.80 Some Brent residents, and others seeking to live in the borough, have accommodation needs that cannot be satisfied through the provision of additional conventional housing as they have historical cultural preferences for a 'nomadic lifestyle'. Nomadic Peoples encompass a wide range of distinct ethnic and cultural groups, who have a common, ethno-culturally derived need for sites to accommodate their caravans and mobile homes.

5.81 In Brent, the primary historical occupiers of nomadic sites have been semi-permanent Irish Travellers. However, consideration must also be given to the potential accommodation needs and preferences of Scottish Travellers, English and Welsh Gypsies, Travelling Showpeople and the more recent Roma (from Eastern & Southern Europe) and Sinti (from Central Europe) arrivals.

²¹ http://brent.limehouse.co.uk/portal/planning/cspo/adopted_cs?pointId=1269942812468#section-1269942812468

5.82 As most of the Irish Travellers who have historically settled in Brent lack the resources to purchase their own sites due to low incomes, disproportionately high unemployment and low skill levels, their accommodation needs can effectively be regarded as a specialist type of 'affordable housing' provided with the assistance of public sector funding, as on the council's Lynton Close site, which currently has 45 mobile homes /caravans accommodating a total of 140 persons, including multi-generational and extended families.

5.83 'The London Gypsy & Traveller Accommodation Needs Assessment' (GLA, 2008) has identified that Brent may require up to a further 24 pitches by 2017 to meet projected further requirements. A considerable proportion of these may arise from Irish Travellers, and possibly Roma, currently living in conventional housing, often temporary accommodation, who have a "proven psychological aversion" to 'bricks and mortar housing' as defined in the 'Gypsy and Travellers Accommodation Assessments: Guidance' (CLG, 2007).

5.84 The proposed revision of the London Plan will set specific borough targets for sites and pitches, in accordance with the requirements of Circular 1/2006 'Planning For Gypsy and Traveller Caravan Sites' (CLG, 2006), which will be addressed in the Development Management Policies DPD. This proposed DPD may be further informed by a potential sub-regional (West London) accommodation strategy which would better reconcile current provision, projected future needs and potential capacities in a manner similar to the wider London Housing Capacity Study (2005) and the current London Strategic Land Availability Assessment.

5.85 Circular 1/2006 and London Plan Policy 3A.14 require that this Core Strategy should have a specific policy to protect existing authorised sites and set out the criteria for the determination of any application for additional sites. Such sites should promote the development of socially inclusive local communities in accordance with PPS 3. A key consideration in determining the specific suitability of the potential site(s) will be the prospective residents' ancillary requirements for space and facilities to undertake the range of employment and entrepreneurial activities often associated with or resorted to by Travellers, Gypsies, Roma and Sinti. This range of mixed use activities effectively requires a site (or sites) capable of satisfactorily accommodating a 'low rise, low density work-live' development. Travelling Show people are likely to require proportionately larger sites owing to their greater equipment storage needs.

Development Plan Documents

The *Site Specific Allocations DPD*²² (adopted 2011) mentions that Gypsy and Traveller issues are covered in policy CP 2.

²² <http://www.brent.gov.uk/tps.nsf/Planning%20policy/LBB-27>

Annual Monitoring Report

The *Annual Monitoring Report 2010/2011*²³ does not mention of Gypsy and Traveller provision.

Housing Needs Assessment and GTANA

The Brent 2003 Housing Needs Survey²⁴ (June 2004) does not assess Gypsy and Traveller needs.

Brent is covered by the *West London Strategic Housing Market Assessment*²⁵ (2010), which mentions the London GTANA survey, but does not include the pitch requirements for the sub-region.

Housing Strategy

The *Housing Strategy*²⁶ for 2009-2014 only mentions that it took into consideration the GTANA and requirements of the Housing Act.

Other

The Council website has a page dedicated to Traveller sites²⁷, which gives contact details for the site manager.

²³ [http://www.brent.gov.uk/tps.nsf/Files/LBBA-1044/\\$FILE/2010-11AMR%20low%20res.pdf](http://www.brent.gov.uk/tps.nsf/Files/LBBA-1044/$FILE/2010-11AMR%20low%20res.pdf)

²⁴ [http://www.brent.gov.uk/tps.nsf/Files/LBBA-218/\\$FILE/Brent%202003%20Housing%20Needs%20Survey%20Final%20Report%20June%202004.PDF](http://www.brent.gov.uk/tps.nsf/Files/LBBA-218/$FILE/Brent%202003%20Housing%20Needs%20Survey%20Final%20Report%20June%202004.PDF)

²⁵ <http://www.westlondonhousing.org.uk/uploads/2011%2001%2024%20West%20London%20SHMA%20Report.pdf>

²⁶ <http://www.brent.gov.uk/stratp.nsf/Pages/LBB-39>

²⁷ <http://www.brent.gov.uk/pks.nsf/Pages/LBB-160>

Bromley

South East sub-region

Core Strategy

The borough is currently developing a Core Strategy. The *Core Strategy Issues* document open to public consultation between July and October 2011 describes the Gypsy and Traveller community in the borough and mentions the Council run traveller sites at Star Lane and Old Maidstone Road and another temporary site.

4.Strategic/Spatial Themes

4.1 Living in Bromley

Bromley has one of the largest communities of Gypsies and Travellers in England. Whilst there are two Council run traveller sites and a further site with temporary permission, the majority of Gypsies and Travellers (between 1,000 and 1,500 families) have been housed in properties in the Cray Valley. The health and well-being of Gypsies and Travellers is the poorest of any ethnic minority group, with average life expectancies between 10 and 12 years less for men and women respectively than the general Bromley population.

3. Area Pen Portraits

3.1.9 Cray Valley, St Paul's Cray and St Mary's Cray

3.1.9.10 The Crays has one of the largest groups of Gypsies and Travellers in England, estimated to be between 1,000 and 1,500 families, the significant majority of which have been housed in "bricks and mortar" as it became harder to find stopping places in this area, although there is potential to increase pitches at Star Lane Gypsy and traveller families tend to be much larger than the general population, have the lowest educational results of any ethnic minority group (Ofsted) and the health and well-being of Gypsies and Travellers is the poorest of any ethnic minority group in the UK, with an average life expectancy 10 years less for men and 12 years less for women than the general population.

Development Plan Documents

A Site Specific Allocations DPD is currently being prepared²⁸.

Annual Monitoring Report

The Annual Monitoring Report 2010/2011²⁹ states that temporary planning permission was granted to the site at Hockenden Lane.

²⁸

[http://cds.bromley.gov.uk/Data/133/20100112/Agenda/\\$9.%20Local%20Development%20Scheme%20Version%204%20\(2009\)%20-%20Appendix.doc.pdf](http://cds.bromley.gov.uk/Data/133/20100112/Agenda/$9.%20Local%20Development%20Scheme%20Version%204%20(2009)%20-%20Appendix.doc.pdf)

Housing Needs Assessment and GTANA

Bromley is covered by the *South East London Strategic Housing Market Assessment* (2009), which does not mention Gypsy and Traveller needs.

Housing Strategy

The Council has not uploaded a Housing Strategy on the website.

Other

The Bromley Gypsy/Traveller Project³⁰ provides advice, support and information to Travellers in Bromley.

²⁹ http://www.bromley.gov.uk/downloads/file/1403/bromley_annual_monitoring_report_1_april_2010-31_march_2011

³⁰ http://www.bromley.gov.uk/directory_record/5680/bromley_gypsy__traveller_project

Camden

North sub-region

Core Strategy

The *Core Strategy*³¹ (adopted Nov 2010) protects the existing sites at Carol Street and Castlehaven Road, as well as the North Fairground Travelling Showpeople plot, and sets out criteria for new sites in Policy CS12: Sites for Gypsies and Travellers. The Strategy recognises the need to provide 2-5 additional Gypsy and Traveller pitches and 2 Travelling Showpeople plots by 2017, as identified in the London GTANA. New sites for Gypsies and Travellers together with travelling showpeople plots will be identified in the Site Allocations DPD.

Policy CS6: Providing quality homes

Tackling social polarisation and creating mixed and inclusive communities

6.29 One of the objectives of the government's strategic housing policy is to create mixed and inclusive communities. The Council aims to achieve mixed communities by seeking a range of housing types suitable for households and individuals with different needs. The range of housing sought will include:

.....

- Sites suitable for gypsies and travellers and travelling show-people.

Policy CS12: Sites for gypsies and travellers

The Council will protect existing lawful sites, plots and pitches for gypsies and travellers and travelling showpeople. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations. The Council will seek to identify sufficient additional plots for households of travelling showpeople and for gypsies and travellers through our Site Allocations document, in accordance with the findings of the London Gypsy and Traveller Accommodation Needs Assessment. New sites, plots and/or pitches for gypsies and travellers and travelling showpeople should:

- a) provide a satisfactory layout and facilities in terms of pitches, hardstanding, parking, turning space, amenity blocks, open space and play areas;
- b) be capable of connection to energy, water and sewage infrastructure;
- c) be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
- d) provide safe access to and from the main road network;
- e) not harm residential amenity or the operational efficiency of nearby properties;
- f) not cause harm to open spaces, Metropolitan Open Land, Sites of Nature Conservation Importance, woodland, water courses etc, and
- g) incorporate appropriate landscaping to prevent harm to the character and appearance of the surrounding area.

³¹ Camden Core Strategy (2010) <http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework--ldf-/core-strategy/>

Justification

- 12.1** Gypsies and travellers are among the most disadvantaged sectors of society in terms of their accommodation. Government Circular 01/2006 – *Planning for Gypsies and Traveller Caravan Sites* states that borough core strategies should set out criteria for the location of gypsy and traveller sites to guide the allocation of sites and to meet unexpected demand.
- 12.2** The Council recognises the needs of gypsies and travellers within the borough, many of whom have established local connections and have developed links with local services. There are five gypsies and travellers pitches in Camden (at Carol Street and Castlehaven Road), and a single site of four households of travelling show people (the North Fairground Site at the Vale of Health). The Council will protect these sites from change to alternative uses unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations.
- 12.3** The London Gypsy and Traveller Accommodation Needs Assessment calculated that to meet the needs of gypsies and travellers and travelling showpeople to 2017, there is a need for a minimum of 2 and a maximum of 5 additional pitches for gypsies and travellers and for 2 plots for travelling showpeople in the borough. The Council will seek to identify sites to meet this need through the Camden Site Allocations document.
- 12.4** We will aim to ensure that new sites/pitches are both adequate and appropriate to the needs of the gypsy and traveller communities and integrated with adjoining communities. All proposals for sites, plots and pitches for gypsies, travellers and travelling showpeople, whether on sites identified through our Site Allocations document or elsewhere, should meet the criteria set out in the policy. Proposals will also be expected to satisfy all other relevant Local Development Framework policies, including policy DP26 on managing the impact of development on occupiers and neighbours in Camden Development Policies and Core Strategy policy CS15 on open space.
- 12.5** The Council will use the definition of gypsies and travellers in Circular 01/2006 “Planning for Gypsies and Traveller Caravan Sites” and the definition of travelling showpeople in Circular 22/91 “Travelling Showpeople”, which set out national policy on site provision for these groups.

Development Plan Documents

*Camden Development Policies 2010-2025*³² [Nov 2010] states that

CS12. Sites for gypsies and travellers *have* “**no development policy**”.

³² Development Policies 2010-2025
http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2614532

*Camden Site Allocations Proposed Submission Document*³³ [March 2012] states that no suitable sites have been identified but the Council will seek to deliver new sites through planning permission and funding schemes or review of future plans.

Gypsies and Travellers

In line with the Core Strategy the Council will be seeking to identify sufficient and appropriate provision for gypsies and travellers. The Core Strategy includes planning policy to protect existing sites and against which new site provision will be determined.

In line with the new approaches outlined through changing Government guidance and the London Plan, the Council has recognised and identified a specific local need for extra provision (as opposed to being a target driven response) and has obtained funding from the Homes and Communities Agency to support such provision.

No specific sites have been identified at this time and this will involve additional time and work in carrying out consultation and identifying potential sites or alternative solutions to meet identified local needs. Gypsy and Traveller site allocations are therefore not the subject of this current DPD. The Council intends to bring forward sites either through obtaining planning permission and funding schemes or through future review of relevant plans. Additional policy may need to be produced to support the intended provision that emerges in the future.

Annual Monitoring Report

The *AMR (2010-11)*³⁴ mentions the existing provision of two Council owned sites comprising 5 pitches and a private travelling showpeople plot. While the monitoring indicator is *Net additional pitches*, the AMR evaluates that the target *No net loss of sites* has been met.

11. Net additional Gypsy and Traveller pitches

Objective: Meeting the housing needs of Camden's population

Target: No net loss of gypsy traveller sites

Target met: Yes

Related policies: CS12 Sites for Gypsies and Travellers

11.1 The Housing Act 2004 required local authorities to include Gypsies and Travellers in their Accommodation Needs Assessment, and to have a strategy in place which sets out how any identified needs will be met as part of their wider housing strategies. There are two permanent gypsy and traveller sites in the borough, providing five pitches. These sites (105 Camden Street and 96 Castlehaven Road) are managed by Camden Council. In addition, there is a privately owned site for travelling showpeople at the Vale of Health. In 2010/11 there was no loss of gypsy accommodation in the borough.

³³ Site Allocations Proposed Submission Document

http://camden.gov.uk/ccm/cms-service/download/asset/?asset_id=2817315

³⁴ AMR (2010-11) http://www.camden.gov.uk/ccm/cms-service/download/asset?asset_id=2774248

Housing Needs Assessment and GTANA

Camden is covered by the *Strategic Housing Market Assessment for North London 2009/10* [Feb 2011] which reports the London GTANA [2008] findings with the provision “these figures are only draft and are being actively challenged”.

Camden’s own *Housing Needs Survey Update (2008)*³⁵ makes no mention of Gypsy and Traveller needs.

There is no Borough-specific GTANA.

Housing Strategy

The *Housing Strategy 2011-16*³⁶ [Sept 2011] recognises an immediate need to identify a site that would accommodate need arising from the overcrowding of the two existing sites.

We will: Secure additional Gypsy and Traveller pitches.

.....

The LDF also seeks to protect existing Gypsy and Traveller pitches and makes a commitment to identify suitable land to meet any additional need.

Gypsy and Traveller sites

The Council owns and manages two small Gypsy and Traveller sites in the borough that provide a total of five pitches. One of these is severely overcrowded. So there is an immediate, short term need to identify a small site to accommodate the overspill, as well as a longer term need to secure up to ten additional pitches. Work is already underway to secure land and funding to resolve the short and long term needs.

³⁵ Housing Needs assessment update
http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=1176419

³⁶ Housing Strategy (2011-16)
<http://camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/camdens-housing-strategy.en>

City of London

East sub-region

Core Strategy

The *Core Strategy*³⁷ [Sep 2011] has one reference to Gypsy and Traveller needs:

3.21.7 The London Boroughs' Gypsy and Traveller Accommodation Needs

Assessment (2008) carried out for the Mayor indicates that there is no requirement to provide gypsy and traveller pitches or accommodation for travelling showmen in the City.

There are no other references to Gypsy and Traveller needs on the web site.

³⁷ http://www.cityoflondon.gov.uk/NR/ronlyres/C256AF24-22DE-4BDE-8417-9DB27EC09E5A/0/DP_PL_CityofLondonCoreStrategyDPDSeptember2011Reduced.pdf

Croydon

South West sub-region

Core Strategy

The *Core Strategy proposed submission*³⁸ [Sept 2011] sets a target to provide 10 additional pitches by 2021 through the Site Allocations DPD, together with criteria for the new sites. The target is informed by the London GTANA estimated need for 6-15 additional pitches by 2017.

Policy CS2: Homes

CS2.1 In order to provide a choice of housing for people in socially balanced and inclusive communities in Croydon the Council will apply a presumption in favour of development of new homes provided applications for residential development meet the requirements of Policy CS2 and other applicable policies of the development plan

Gypsies and Travellers

CS2.7 The Council will seek to deliver ten additional Gypsy and Travellers pitches in the borough by 2021 to meet the need of Croydon's Gypsy and Traveller community. This will be achieved by allocating land for Gypsy and Traveller pitches in the Site Allocations DPD. Proposals for sites should meet the following criteria:

- Should be available and deliverable; and
- Should have good access to essential services including health and education facilities and access to local shops; and
- Have good means of access from roads and be near bus routes and other transport nodes; and
- Not be located in areas of high flood risk (Flood Risk Zone 3); and
- Should not have adverse impact on the biodiversity of the borough.

The supporting paragraphs go on to say

Gypsies and Travellers

4.17 Both English Gypsies and Irish Travellers are recognised as ethnic groups and like other members of Croydon's Black and Minority Ethnic communities are protected from discrimination by the Equalities Act 2010. Local authorities are required to assess their need for housing in the same way that they are required to assess the needs for new homes for people who live in "bricks and mortar" homes.

4.18 There is a need for between six and fifteen new Gypsy and Traveller pitches (a pitch being space for one mobile home) in Croydon up to 2017 providing for the English Gypsy and Irish Traveller communities

The location of new pitches must enable the residents to access services including schools and health facilities in the same way that residents of new houses need to be able to access community facilities. In addition Gypsy and Traveller sites need good

³⁸ Core strategy proposed submission documents 2011

<http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/868213/1114530/proposedsubmissioncorestrat.pdf>

access to the road network as they often need to move larger vehicles as part of their livelihood and way of life

Appendix 2 – Delivery Matrix

Policy	CS2 – Homes
What?	10 new pitches for Gypsy and Travellers
Who?	Croydon Council
How?	<ul style="list-style-type: none"> ● Croydon Council will allocate land for new pitches in the Site Allocations DPD. ● Provision of pitches on a site dependent either on a private development or a Registered Provider.
When?	2011-2021
Outcome if not delivered?	<ul style="list-style-type: none"> ● Review Site Allocations DPD ● Re-appraise availability of land in borough to identify new sites for Gypsy and Traveller pitches. ● Work with Registered Providers and public sector land owners in Croydon to identify other potential for new pitches.

Development Plan Documents

The Borough's "call for sites" for the Site Allocation DPD closes in April 2012 and the council will publish the first draft of the *Joint Detailed Policies and Proposals DPD* late in 2012³⁹.

Annual Monitoring Report

The *AMR 2010-11*⁴⁰ restates the target set in the Core Strategy.

Outcomes	Indicator	Targets	Performance	Direction
Meeting the need for gypsy and traveller pitches	The number of authorised pitches for Gypsies and Travellers in the borough	29 authorised pitches for Gypsies and Travellers by 2021	19 authorised pitches in 2011	<>

³⁹ <http://www.croydon.gov.uk/planningandregeneration/croydons-planning-policy-framework/croydon-local-plan>

⁴⁰ Croydon Council's AMR 2010-11
<http://www.croydon.gov.uk/contents/departments/planningandregeneration/pdf/1160231/amr1011>

Housing Needs Assessment and GTANA

The *South West Housing Partnership produced a SHMA* [Jan 2012] reports the interim Draft Replacement London Plan target for Croydon of 22 pitches was already out-of-date when it was published.

In 2008 conducted its own 'informal' *Croydon GTANA*⁴¹ [released Sept 2011] which is as follows:

Gypsy and Traveller Accommodation Needs Assessment Detailed results of Croydon survey 2008/09

An additional informal survey was conducted during 2008/09 by the tenancy officer for the existing council site, the Travellers Education Service and Street scene Enforcement Officers.

- 4 housed Irish travellers who would like to be on a site and have families in Croydon and elsewhere
- 12 English Gypsy families on the Lathams Way site (of which 8 were overcrowded).
 - 1 family (traveller group unspecified) on an unauthorised site
 - 8 Irish Traveller families living in caravans in Layhams Road, in the London Borough of Bromley, but near the borough boundary – whose children are all in Croydon schools. These are on an unauthorised private site and are subject to legal action by Bromley Council.

The need identified among 4 housed travellers and 8 overcrowded families on the Lathams Way site totalled 14 pitches:

- 5 for adults with no children,
- 2 for adults with 1 or 2 children
- 6 for adults with between four and six children.

If need from Layhams Road is taken into account, this would increase to 22 pitches, of which 14 would be for large families.

Respondents from Lathams Way (English Gypsies)

- needed 10 pitches, 5 for households with one or two adults, the remainder for families with 2 to 4 children
- wanted a rural site 'outside Croydon' with green areas, space for children to play and no electricity pylons.
- were insistent that they would not consider moving to a site shared with other groups, such as Irish travellers, or Roma.

The need for one large family will be met by dividing one large pitch on the site, leaving a net need for 9 extra pitches.

Respondents from existing housing (Irish travellers)

- needed 4 pitches, all for families with 4 to 6 children
- would consider a site Croydon
- would consider moving to a site shared with other groups, such as Irish travellers, English Gypsies or Roma.

⁴¹ <http://www.croydon.gov.uk/planningandregeneration/croydons-planning-policy-framework/ldf-evidence-base/homes>

Respondents from Irish Traveller families in Layhams Road, Bromley needed 8 pitches, all for families with 4 children would consider a site Croydon would consider moving to a site shared with other groups, such as Irish travellers, English Gypsies or Roma.

60-70 households living in housing in Croydon are known to the Traveller Education Service (TES), including English gypsies, Irish travellers and Polish Roma Travellers. Of these, 30 families are in contact with the service. Other travellers are mentioned to TES by travellers but not named.

Transit travellers

Transit travellers did not wish to respond to the survey. It was noted that the enforcement process was not conducive to collect information on housing need. The transit traveller family who responded stated that they were looking for a transit site in London.

In 2008/09 70 separate illegal traveller encampments were recorded. Taking the A232 (Duppas Hill, Croydon Flyover) east to west as dividing the Borough in half there were 32 incidents North of that divide and 38 south of it.

The vast majority of encampments were on or in the neighbourhood of Purley Way, and the remainder were in South Croydon/Shirley and in Coulsdon.

At any one time between one and three extended families were involved. Between one and ten caravans and camper vans were involved, on average

Housing Strategy

Croydon's *Housing Strategy 2006-10*⁴² [March 2007] makes one reference to Gypsy and Traveller needs:

This strategy recognises that not all groups will have their accommodation needs met through increasing the supply of conventional housing. We have looked at current provision for gypsies and travellers in the borough and identified some immediate needs: there is a shortage of provision on our permanent gypsy site to meet the needs of newly emerging households within the existing community; there is also a lack of provision for gypsies and travellers passing through the borough, which is giving rise to unauthorised encampments. We are currently supporting a pan London proposal to commission research to provide us with a full picture of gypsy and traveller housing needs in our borough.

The Housing Strategy⁴³ for 2011/12-2015/16 (March 2012) states that the Council has a target to deliver 10 additional pitches by 2021.

⁴² Croydon's Housing Strategy 2006-10 <http://www.croydon.gov.uk/contents/departments/housing/pdf/Strategy.pdf>

⁴³ <http://www.croydon.gov.uk/contents/departments/housing/pdf/756912/Hsg-strategy.pdf>

Ealing

West sub-region

Core Strategy

The Core Strategy Rough Edit Version⁴⁴ (adopted April 2012) protects the existing site at Bashley Road and states that there is no need for additional sites in the short to medium term. Criteria for new sites will be set out in the Development Management DPD.

Policy 1.2

1.2 (n) To protect the existing Gypsy and Traveller site at Bashley Road, Park Royal, and to consider additional provision subject to local evidence of need.

The Council's reputation as a local and regional support hub for gypsies and travellers facing accommodation related issues is based on the high quality of service provision in supporting gypsies and travellers looking for accommodation suited to their needs. Historical trends show that there is sufficient churn at the Bashley Road site to cope with the current waiting list as of 2011, with no identified need for provision of an additional site in the short to medium term. The Council will therefore only contribute towards the provision of additional pitches in Ealing based on strong evidence of need, balanced against general housing priorities, availability of funding and the feasibility of identifying an appropriate site. Planning applications for the provision of additional Gypsy and Traveller sites will be determined against the criteria based policy included in the Development Management DPD.

Development Plan Documents

The *Development Management DPD Publication version*⁴⁵ (submitted June 2012) includes Gypsy and Traveller accommodation under Policy 3B Special Residential Accommodation and states that further development is subject to identifying needs.

Policy 3B Special Residential Accommodation

Local Policy

A. The development of special residential accommodation will be supported where it meets the identified needs of a specific local group.

Special residential accommodation is any type of dwelling that differs in form or occupation from normal housing and includes, but is not limited to, student hostels and Gypsy and Traveller sites.

⁴⁴ http://www.ealing.gov.uk/downloads/download/1322/adoption_of_the_development_or_core_strategy

⁴⁵ http://www.ealing.gov.uk/downloads/download/1550/publication_versions

Annual Monitoring Report

The *AMR 2010-11*⁴⁶ mentions gypsies and travellers, claiming that because the wait list for pitches is relatively short, and that because Ealing has significant housing support for gypsies and travellers, no pitches are necessary:

Net additional Pitches (Gypsy and Traveller)

Core Output Indicator H4: Net additional pitches (Gypsy and Traveller) – 0

There were no additional pitches provided for Gypsies and Travellers in 2010/11; no applications were received for Gypsy and Traveller pitches. Policy 1.2 of the Development Strategy protects the existing council-managed Gypsy and Traveller site at Bashley Road, and makes a commitment to consider additional provision subject to evidence of need. There is significant churn on the Bashley Road site, with three pitches having been re-let since April 2009. The waiting list at September 2011 is for four families, however one of these families is waiting for a certain pitch to become available. Historical trends show that there is sufficient churn at the Bashley Road site to cope with the current waiting list as of 2011, with no need for provision of an additional site in the short to medium term.

The level of churn on the site in combination with the quality of support provided by the Council for families facing accommodation issues is therefore sufficient to address the current level of need evidenced by the waiting list. Furthermore, the borough has no unauthorized pitches or encampments, nor past precedence of such types of development. The Development Management DPD will contain a criteria based policy for the determination of planning applications for Gypsy and Traveller sites.

Housing Needs Assessment and GTANA

Ealing is covered by the *West London Strategic Housing Market Assessment 2010 - Report of Study Findings* [Nov 2010] which describes the London GTANA and the London Plan but gives no figures of need for pitches.

The Ealing *Housing Needs Assessment*⁴⁷ [Aug 2009] presents the findings of the London GTANA [2008].

There is no Borough-specific GTANA.

Housing Strategy

The *Housing Strategy 2009-2014*⁴⁸ [Mar 2010] makes reference to Gypsy and Traveller needs as follows.

46 http://www.ealing.gov.uk/download/downloads/id/2681/amr_201011

47 http://www.ealing.gov.uk/download/downloads/id/725/strategic_housing_market_and_needs_assessment

48 http://www.ealing.gov.uk/download/downloads/id/718/housing_strategy_2009-2014

Gypsies and travellers

Housing is working with other Council departments on the Ealing Interagency Forum for Gypsies and Travellers to provide a quality service for this group of people.

The Council has a Gypsy and travellers' site in Bashley Road, North Acton. The site, managed by Ealing Homes on behalf of the Council, has 24 pitches and a site manager.

We have received a £300,000 grant from Communities and Local Government, for site refurbishment, which we have 25% match-funded. Ealing Homes is currently consulting with site residents about refurbishment plans, including improving access, paths and amenity buildings.

The Council also provides a floating support worker, funded through Supporting People, whose role is to enable residents to sustain their tenancy.

A London-wide study of Gypsy and traveller provision, carried out by the Greater London Authority (GLA) in 2007, indicated a need for an additional 768 new pitches across the capital. For Ealing, this would mean providing between eight and sixty new pitches over the next 10 years.

What we will do: Carry out local study of need

Although our current provision of Gypsy and traveller sites is relatively close to the lower projection in the GLA study, we want to make sure we have an accurate local view. We are therefore carrying out our own study with west London local authority partners to understand specific local need⁴⁹. The results will be used to inform future strategy.

Gypsies & Travellers – Housing Act 2004 requires local authorities to assess the accommodation needs of gypsies and travellers residing in, or resorting to, their district when they undertake a review of housing needs in the district.

⁴⁹ We suspect this refers to the West London Housing Partnership *Working with Housed Gypsies and Travellers: a Good Practice Guide* [Jul 2010]

Enfield

North sub-region

Core Strategy

Enfield's *Core Strategy 2010-2025*⁵⁰ [Nov 2010] states that there is no identified need for Gypsy and Traveller accommodation in the Borough, but offers a set of criteria for new sites.

5.46 there is a need for quality specialist accommodation services to meet the housing and support requirements of particular groups. These include older people, people with physical disabilities, people with learning difficulties, people with mental ill health and accommodation for the gypsy and traveller communities.

CORE POLICY 6: MEETING PARTICULAR HOUSING NEEDS

.....

Locations for gypsy and traveller sites should meet the following criteria:

- There is vehicular access from the public highway and provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;
- There is no harm to visual amenity and there is adequate landscaping and planting, with appropriate trees and shrubs;
- The site has good access to shops, health care, school and other education facilities;
- The site is not in an area at high risk of flooding, including functional floodplains; and
- The size of the site is appropriate to its local context, and in relation to the local infrastructure and population size and density.

The Council will work with the Mayor of London to identify whether there is a requirement for pitches within the Borough, taking into account the existing supply of pitches readily accessible from the Borough in the wider area. Where need can be demonstrated, the Sites Schedule or relevant area action plan will consider appropriate sites for gypsy and travellers accommodation, having regard to the above criteria and any further guidance to be included in the Development Management Document as necessary. The presence of green belt and flood risk areas within the Borough will constrain and limit opportunities for identifying sites.

Justification

5.51 Enfield currently has no gypsy and traveller sites and the Gypsy and Traveller Accommodation Needs Assessment (March 2008) identifies that Enfield has the third lowest need for sites within London. The Mayor of London is reassessing the methodology for assessing allocation of sites across London, which is expected to inform the revision of the London Plan. This may result in a need for Enfield to identify sites, however, in the absence of clear and immediate need **there is no justification for allocating sites in advance of the consideration of pitch numbers as part of a revision to the London Plan.** The Core Policy complies with ODPM Circular 01/2006.

5.54 Although there is no justification for allocating new Gypsy and Traveller Accommodation sites within the Borough, this will be reviewed on an on going basis with the Mayor of London and if necessary relevant DPD documents will be reviewed where appropriate.

50 http://www.enfield.gov.uk/downloads/file/3329/the_enfield_plan-core_startegy_adopted_november_2010

Development Plan Documents

Initial consultation on both the Development Management and Sites Schedule DPDs is due to start in Spring 2012.

Annual Monitoring Report

The most recent Annual Monitoring Report⁵¹ available from the Enfield website is that for 2008-2009, which states that no pitches were provided in the review year.

Housing Needs Assessment and GTANA

Enfield is covered by the *Strategic Housing Market Assessment for North London 2009/10* [Feb 2011] which reports the London GTANA [2008] findings with the proviso “these figures are only draft and are being actively challenged”.

Enfield's *Housing Market Assessment*⁵² [Feb 2010] makes reference to Gypsy and Traveller needs as follows:

6.9 Gypsies and Travellers

The London Borough's 2008 Gypsy and Traveller Accommodation Needs Assessment concluded that there was no need for any pitches in Enfield on its 'minimum need' calculation. However it did estimate two gypsy and traveller households with a 'psychological aversion' to bricks and mortar housing might require appropriate accommodation over the next decade.

There is no Borough-specific GTANA.

Housing Strategy

The Enfield Draft Housing Strategy⁵³ (2012) states that the Council will collaborate with the Mayor of London to monitor need for gypsy and traveller pitches.

51 http://www.enfield.gov.uk/info/856/planning-local_development_framework/500/annual_monitoring_report

52 http://www.enfield.gov.uk/downloads/file/2078/enfield_strategic_housing_market_assessment_2010

53 http://www.enfield.gov.uk/info/100008/your_council/1777/enfields_draft_housing_strategy

Other

Enfield's website had a section specifically for Travellers, that reads the following:

Information for Travellers

Pitches for Travellers

Enfield presently does not have any pitches available for Travellers or Travelling show persons.

Will any pitches be available in the future?

The recent London Mayor's report on this subject identified the possibility of providing four pitches in the future.

It has not been confirmed if Enfield Council will be required to provide these pitches. A decision about this will be made in the future.

London Gov Website - London Plan Gypsy and Traveller Pitch Targets

Greenwich

South East sub-region

Core Strategy

The Greenwich *Draft Core Strategy with Development Management Policies*⁵⁴ [Nov 2010] protects the existing Gypsy and Traveller site at Thistlebrook and sets out criteria for new sites which would be allocated through the Site Specific Allocations DPD.

Policy H4 Gypsy and Traveller Needs

The Council will seek to retain existing provision for Gypsies and Travellers and any new provision will be allocated through **the Site Specific Allocations DPD** to meet any additional pitch requirement proposed in the London Plan. Any increase in provision should include basic amenities and services and would be assessed against the following criteria:

- i. Sufficient access to local shops, services and facilities
- ii. The development of the site will not result in an undue concentration of such developments which would adversely affect the character or amenity of the area
- iii. Compatibility with other policies of the Plan particularly in terms of environmental amenity and the need to retain open spaces

*Note - The Draft London Plan Gypsy and Travellers policy and proposals are to be tested at the Plan's Examination in Public and **the above policy will reflect the outcome of this.***

In relation to this note see the *AMR 2010-2011* below

Support

4.1.13 This policy is consistent with Circular 01/2006 '*Planning for Gypsy and Traveller Caravan Sites*'. (Note: the Government has recently announced their intention to revoke the Circular.)

4.1.14 The dedicated permanent site for travellers at Thistlebrook provides 40 pitches (20 large and 20 medium) meaning Greenwich already has one of the higher capacities in London.

4.1.15 A London wide assessment of future supply and demand has been conducted on behalf of all London boroughs by the GLA and the requirements are set out in the Draft London Plan. These are yet to be tested through the London Plan Examination in Public.

Reasonable Alternatives

An alternative to Policy H4 would be to set out where exactly in the Borough is most appropriate for a new gypsy and traveller site. As the requirements of the Draft London Plan are currently being tested at the EiP, it is not a reasonable alternative at this stage.

⁵⁴ http://greenwich-consult.limehouse.co.uk/portal/draft_core_strategy?pointId=527855

Development Plan Documents

The *Site Specific Allocations DPD* is only in the consultation phase and the submission draft is not due until May 2013. It appears that the Development Management DPD has been integrated into the Core Strategy.

Annual Monitoring Report

The *AMR 2010-2011* reports that no new pitches were established that year. It also states that

4.3.23 The new policy for the Core Strategy needs to be consistent with *DCLG's Planning for Traveller Sites: Consultation 2011*. When the final version of the planning policy statement is published, it will replace Circular 01/2006: *Planning for Gypsy and Traveller Caravan Sites* and Circular 04/2007: *Planning for Travelling Showpeople*.

Housing Needs Assessment and GTANA

Greenwich is covered by the *South East London Strategic Housing Market Assessment 2009*, which does not mention Gypsy and Traveller needs.

There is no Borough-specific Housing Needs Assessment or GTANA.

Housing Strategy

The only housing strategy document that could be identified as such on the Greenwich borough website was a draft *Consultation on the Draft Housing Strategy*⁵⁵ [autumn 2010]. The only reference to Gypsy and Traveller needs is to say that Greenwich needs to:

Review needs of gypsies and travellers in response to changing policy and good practice.

55 https://consultations.greenwich.gov.uk/uploadedfiles/101018Housing_Strategy_Consultation.pdf

Hackney

East (and North) sub-region

Core Strategy

Hackney's *Core Strategy*⁵⁶ [adopted Dec 2010] covers Gypsy and Traveller accommodation in Core Strategy Policy 23 Provision for Gypsies and Travellers, which protects existing sites and sets out criteria for new ones. It recognises the need identified by the 2008 GTANA for 13-34 additional pitches by 2017, but claims that shortage and cost of land make it very difficult to allocate sites to meet this need.

Provision for Gypsies and Travellers

7.65 In recent years, the Gypsy and Traveller community have struggled to secure sufficient caravan sites to meet their needs. The Government Circular 01/2006 provides guidance on addressing the shortfall and under-provision of facilities and requires that local authorities plan for provision of new pitches through their Local Development Framework. The Core Strategy should set out criteria to be used for site selection, but.

7.66 The London Gypsy and Traveller Accommodation Needs Assessment (LGTANA), 2008 identified the requirement for a minimum of 13 and maximum of 34 additional pitches by 2017. The shortage and cost of land mean that opportunities for new gypsy and traveller accommodation in Hackney are finite, and there are considerable practical difficulties in identifying and bringing forward a site within the tightly drawn boundaries and high population density of the borough in order to meet this identified need.

7.67 The borough will work with partners, Registered Social Landlords, developers and neighbouring authorities to try and identify mechanisms to meet this need. Hackney will carry out a survey of potential permanent sites and transit sites for Gypsies and Travellers. If necessary, the council will also consider the possibility of joint provision with a neighbouring local authority.

Core Strategy Policy 23

Provision for Gypsies and Travellers

Hackney will resist the loss of existing sites and plan to bring forward suitable sites to meet the local need for additional Gypsy and Traveller caravan pitches with regard to the requirements set out in the London Plan's need assessment, Government Circular 01/2006 and the borough's housing targets.

Sites for Gypsies and Travellers should be easily accessible from the public highway, should be within reasonable travelling distance of social infrastructure such as shops, health centres and local school facilities. New sites should be in keeping with the existing local environment and other key planning considerations such as flood risk, and neighbourhood character.

⁵⁶ Hackney's Core Strategy (2010) <http://www.hackney.gov.uk/Assets/Documents/Adopted-LDF-Core-Strategy-final-incchaptimagescov-Dec2010-low-res.pdf>

Policy 23: implementation and monitoring

7.68 This policy can only be delivered through the spatial planning system, primarily through the Site Allocation DPD and also through the Development Management DPD to be produced in 2011.

7.69 The Council will work with Hackney Homes to ensure the borough's policies are achieved. Existing sites will be safeguarded through development control processes.

7.70 Monitoring will take place of planning approvals for new sites, and will be reported on through the Annual Monitoring Report.

Indicators to monitor delivery of policy 23

Number of existing sites, plots and/or pitches for households of travelling showpeople and for gypsies and traveller.

In addition, the *AMR 2010-11* states that the policy on Housing Growth is relevant when addressing the need for additional pitches or the loss of existing ones. While this policy makes no specific mention to Gypsy and Traveller needs, perhaps most significantly, it states⁵⁷ that:

Core Strategy Policy 19: Housing Growth

.....

Hackney will seek to resist the loss of family accommodation and promote the provision of new family accommodation (3 bed or larger) of all tenures as well as seeking to provide a mix of housing to meet the identified needs of different types of households within the borough and to create cohesive, tenure diverse communities.

Development Plan Documents

Consultation drafts of both the Development Management DPD and the Site Allocations DPD are due to be published in 'early 2012'.

The *Draft Site Allocations Local Plan DPD* (July 2012) states that the Council has not found sites that meet the criteria set out in the Core Strategy.

9.6. Criterion i of Policy 3.8 'Housing Choice' of the London Plan (2011) determines that local authorities in co-ordination with neighbouring boroughs and districts are best placed to assess the needs, of and make provision for gypsies and travellers. The London Gypsy and Traveller Accommodation Needs Assessment identified that the Borough needs to provide between 13 and 34 additional pitches up to 2017, additional to the pitches/sites already accommodating such communities in the Borough.

⁵⁷ (p107)

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/site-allocations-development-plan.en>

9.7. However, there appears little land availability in the Borough to meet the requirements of these communities. The Council has considered a number of possible locations against the criteria set out in Core Strategy Policy 23 'Provision for the Gypsies and Travellers', however, those locations do not meet the criteria in that policy. Officers have looked at the capacity of existing authorised sites in Hackney to consider if this could be increased/expanded, however, have not identified any capacity, mindful of the impact on the needs and amenity of existing communities on those sites. Additionally, the potential expansion of such sites to neighbouring sites has been assessed; it is not considered appropriate to include adjacent sites together with existing sites as 'site allocations' for this document at this stage, given that there may be constraints on expansion and the additional site area may fall well below the site size threshold set out above. The identification of sites is part of an ongoing process by the Council and relevant parties. Should a planning application for a gypsy and traveller site come forward the Council will consider any application against the relevant policies, in particular Core Strategy Policy 23. The Council will be seeking to identify sufficient and appropriate additional pitches and plots. Through this consultation, the Council would like to hear suggestions on how these needs could be met.

Annual Monitoring Report

The *AMR 2010/11*⁵⁸ gives a substantial amount of material on current pitches for gypsies and travellers. It states that no additional pitches have been delivered in the review year and it does not set any targets.

Gypsy and Traveller Pitches

Type	Core Indicator, National Indicator NI154
Target	No target
Output	27 in total: 0 additional in 2010/11
UDP 1995	Policy HO2
Core Strategy	Policy 19, 23
Draft DM Policy	N/A

- 7.87 The Gypsy and Traveller (G&T) community is widely considered to be one of the most disadvantaged sectors in society. A pitch is the area of land demarcated for use as accommodation by a G&T household, sometimes including extended families which may require space (within one pitch) to provide for more than one caravan.
- 7.88 Hackney currently has 27 authorised pitches, as outlined below. Although there were no additional pitches delivered during 2010/11, Core Strategy Policy 23 is designed to facilitate the identification of suitable additional sites for pitches over the lifetime of the LDF.
- 7.89 There are 22 pitches on three permanent G&T sites in the borough, namely:
- 1 – 7 St Theresa's Close, Homerton Road, E9 5EF:
containing 7 pitches,
 - 1 – 8 Ruby Close, Millfields Road, E9 OAF:
comprising 8 plots accommodating 6 group housing units and 2 pitches,

⁵⁸ Annual Monitoring Report (2010-2011) <http://www.hackney.gov.uk/Assets/Documents/AMR-2010-11.pdf>

1 – 7 Abbey Close, Rendlesham Road, E5 8AQ
contains 7 pitches and an amenity block

7.90 There are two temporary G&T sites with planning permission expiring 30th June 2014. These are located at:

1 St Anthony's Close, Wallis Road E9 5EH:
five plots comprising 3 group housing units and 2 pitches with permanent ancillary amenity block and private amenity areas,

1-4 Palace Close, Chapman Road E9 5DW:
Nothing there as yet.

7.91 There are 3 unauthorised encampment sites in Hackney, these are:

- An unauthorised encampment in front of the authorised 1 – 7 St Theresa's Close. A judge ruled in favour of the Council to remove the occupiers of this site, given that it is occupying parkland.
- An unauthorised encampment in Fronton Park Road. The occupier has a leniency agreement with the Council to remain on the land but is not to engage in any crime or anti-social behaviour until the land is needed.
- An unauthorised encampment at Chapman Road comprising about 10 caravans mostly occupied by single men with lots of dogs. This encampment has been there since early 2010 and they have a leniency agreement with the Council, similar to that of the occupant at Fronton Park Road.

7.92 Despite this, Hackney is one of only two London boroughs with a waiting list for pitches on traveller sites, and there are 34 people currently on the waiting list. The waiting list includes people living in houses but who would prefer to live on pitches, and those residents on unauthorised encampments.

7.93 The London Gypsy and Traveller Accommodation Needs Assessment 2008 originally concluded that London needed to provide between 238 and 768 new pitches between 2007 and 2017.

7.94 The Mayor of London's draft Housing Strategy was published in November 2008, and taking its lead from the Gypsy and Traveller Accommodation Needs Assessment gave an estimated need for the number of residential pitches at a borough by borough level to 2017. Hackney's net contribution over the period was to deliver 13 new pitches in a minimum scenario, 34 under the maximum.

7.95 The draft replacement London Plan of October 2009 proposed a change to pitch provision by removing the 'low' and 'high' targets and replaced them with a single target of 19 pitches.

7.96 However in March 2010, the Mayor of London published proposals to reduce the London-wide target for Gypsy and Traveller pitches from 538 to 238. This in turn reduced Hackney's target to 7 new pitches over the lifetime of the replacement London Plan, although this target too was later erased by the September 2010 Minor Alterations version of the draft Plan.

7.97 Following the London Plan EIP, paragraph 3.127 of the Panel Report 66 (published March 2011) stated that "The inescapable conclusion is that in the context of London, which is acknowledged as being a single, albeit complex, strategic housing market area, a solution reliant wholly on Boroughs acting individually is unlikely to meet the

demonstrable need for significantly increased numbers of pitches for Gypsies and Travellers”.

- 7.98 In light of that conclusion, the Panel did not endorse the Mayor of London's proposed Minor Alteration requiring boroughs to set their own targets based on local needs, and instead the Panel Report recommended that new pitch targets were set through the Housing Partnership sub-regions of the London Plan.
- 7.99 In August 2010, the Secretary of State for Communities and Local Government announced the Government's intention to withdraw the Circulars 01/2006 and 04/2007 which set the framework for Gypsy and Traveller Planning. The Government intends to replace them with a single Planning Policy Statement for traveller's sites as part of a range of changes under the Localism Bill agenda.
- 7.100 The new consultation PPS, 'Planning for Travellers Sites' was published in April 2011. This set out proposals aimed to facilitate the delivery of more pitches including proposals to include traveller sites in the New Homes Bonus scheme (see chapter 3), the resumption of grant funding for traveller sites, and to bring traveller sites into the Mobile Homes Act (1983) to give residents improved protection against eviction.
- 7.101 Under the proposed new framework, local authorities will become responsible for setting their own targets regarding new G&T pitch provision.

Housing Needs Assessment and GTANA

Hackney is covered by 3 Housing Needs Assessments: The East and North London sub-regional assessments and a local housing needs assessment.

The *Strategic Market Housing Assessment for East London 2009/10* [Sept 2010] reports the Borough level need for pitches given in the London GTANA [2008], without setting any targets for future provision.

The *Strategic Housing Market Assessment for North London 2009/10* [Feb 2011] reports the overall sub-regional need for pitches given in the London GTANA [2008] with the proviso “these figures are only draft and are being actively challenged”. There are no targets.

The third, *Hackney Housing Needs Assessment*⁵⁹ [July 2009] makes no mention of Gypsies or Travellers.

There is no Borough-specific GTANA.

⁵⁹ Hackney Housing Needs Assessment (2009)
http://www.hackney.gov.uk/Assets/Documents/hackney_housing_needs_assessment_incl_housing_needs_survey_2009_.pdf

Housing Strategy

The *Housing Strategy 2010-15*⁶⁰ [Oct 2010] states:

Gypsy and Traveller site provision

2.70 The Gypsy and Traveller community in Hackney is complex and diverse and we will seek to further understand the specific need requirements of the groups within the community through increased engagement and partnership approaches directly with the community itself.

2.71 We are committed to securing sufficient provision for Gypsies and Travellers through specific policies in our LDF Core Strategy and we will be providing further detailed guidance in forthcoming forward planning initiatives. Our key aim is to resist the loss of existing sites and pitches and to plan for additional sites and pitches that meet the requirements of locally identified need. We will also seek to identify mechanisms such as joint collaborative working with neighbouring boroughs to meet identified need.

Action Plan

Core Objective One, Priority 3: Enabling and managing housing growth

Target / Objective: Address the most acute housing needs, enable mixed and sustainable communities to flourish, and continue to secure an improved housing offer for families;

Action:

.....

Identify scope and mechanisms for the provision of additional Gypsy and Travellers pitches in line with London Plan requirements. Target date: 2011

⁶⁰ Hackney Housing Strategy (2010-2015) <http://www.hackney.gov.uk/Assets/Documents/Housing-Strategy-2010-2015.pdf>

Hammersmith and Fulham

West sub-region

Core Strategy

The Core Strategy (adopted 2011) has a policy that protects the site at Westway (east of White City Opportunity Area), provided jointly with RBKC. The policy also sets out criteria for additional sites. The Core Strategy does not set any targets for provision of new pitches.

Borough Wide Strategic Policy - H5

Gypsies and Traveller Accommodation

The council will work closely with RBKC to protect and improve the existing gypsy and traveller site at Westway which is located in Kensington & Chelsea.

Any additional site to accommodate the specific needs of Gypsies and Travellers in this borough should:

- meet local need;
 - take account of suitable vehicular access and satisfactory parking, turning and servicing;
 - be within close proximity of local facilities and services such as a primary school, local shops and a GP;
 - and
- for the occupants and at the same time does not impact on residential amenity.

be design

Justification

8.36 Circular 1/2006 and London Plan Policy 3.8 require that this Core Strategy should have a specific policy to protect existing authorised sites and set out the criteria for the determination of any application for additional sites. Such sites should promote the development of socially inclusive local communities in accordance with PPS 3.

8.37 The council and the Royal Borough of Kensington and Chelsea (RBKC) jointly provide a site for 19 travellers' pitches on land in RBKC to the east of the White City Opportunity Area. Work is ongoing to improve the existing site. Although the bid for government funding to provide two additional pitches on the site as well as other improvements in terms of landscaping, safety and security, parking and access was unsuccessful, there is a commitment from both boroughs to improve the physical environment at a cost of £250K. Work will commence in 2011/12.

8.38 The requirements for a gypsy and travellers site are more demanding than for residential development. Gypsy and traveller sites often contain a number of ancillary employment activities for which space is necessary. These activities can in turn, cause a disturbance to the amenity of neighbouring residents. Site selection must therefore find a balance between finding a suitably sized accessible location near to local facilities and services and a location where the amenity of the borough's existing residents remains unaffected.

Development Plan Documents

The Development Management DPD Submission⁶¹ (July 2012) mentions that Gypsy and Traveller sites are covered by the Core Strategy Policy H5.

Annual Monitoring Report

The AMR⁶² (2010/2011) mentions the improvement work on the Westway site and policy H5 in the Core Strategy. It evaluates that no additional pitches have been provided in the review year.

Housing Needs Assessment and GTANA

The Hammersmith and Fulham Housing Market Assessment⁶³ (2010) mentions the GTANA estimates for additional pitches (a maximum of 5 for 2007-2012).

Hammersmith is also covered by the West London SHMA (2010) which mentions the GTANA requirements for the region, but no specific targets for the borough.

Housing Strategy

The Housing Strategy⁶⁴ 2007-2014 does not mention Gypsy and Traveller issues.

⁶¹

http://www.lbhf.gov.uk/Directory/Environment_and_Planning/Planning/Planning_policy/173825_Submission_DM_DPD.asp

⁶² [http://www.lbhf.gov.uk/Images/AMR%202011%20\(HF\)_tcm21-168037.pdf](http://www.lbhf.gov.uk/Images/AMR%202011%20(HF)_tcm21-168037.pdf)

⁶³ http://www.lbhf.gov.uk/Images/HMA%20v11_tcm21-152602.pdf

⁶⁴ http://www.lbhf.gov.uk/Images/Housing_Strategy_Final_Bookmarked_tcm21-80328.pdf

Haringey

North sub-region

Core Strategy

The Core Strategy has not been adopted yet. The Core Strategy Proposed Submissions document⁶⁵ (May 2010) includes a policy on Gypsies and Travellers which protects the two existing sites providing 10 pitches and sets out criteria for additional pitches, which will be identified in the Site Allocations DPD.

SP3 - Gypsies and Travellers

The Council will protect existing lawful sites, plots and pitches for Gypsies and Travellers. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations within Haringey.

Any new site or substantial alteration to an existing site shall:

Provide satisfactory layout and facilities in terms of pitches, hardstanding, parking, turning space, amenity blocks, open space and play areas;

Be capable of connection to energy, water and sewage infrastructure;

Be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;

Provide safe access to and from the main road network;

Not cause harm to the residential amenity or the operational efficiency of nearby properties; and

Not cause harm to/or the loss of designated Metropolitan Open Land, Sites of Nature Conservation Importance, woodland and watercourses.

Land for Gypsies and Travellers 3.3.1 Haringey will identify land for gypsies and travellers site development in response to Circular 01/2006 "Planning for Gypsies and Traveller Caravan sites" in order to meet Traveller Accommodation Needs Assessment (GTANA) 2008, the Council will require four additional pitches up to 2017. Additional need beyond this period will be looked at. 3.3.2 There are two existing permanent gypsy and traveller sites in Haringey providing 10 pitches. The Council will continue to safeguard these sites and refurbish where needed. Any potential new sites will be identified in the Site Allocations DPD.

⁶⁵ http://www.haringey.gov.uk/haringey_proposed_submission_core_strategy-2.pdf

Development Plan Documents

The Site Specific Allocations and Development Management DPDs are being prepared for consultation which will take place this year. The consultation versions⁶⁶ (May 2010) of the documents do not mention Gypsy and Traveller sites.

Annual Monitoring Report

The AMR 2010/2011⁶⁷ states that there are currently two sites comprising 10 pitches in the Borough. No new net additional pitches were provided in the review year. The report mentions the GTANA minimum and maximum estimated need. New sites are to be identified in the Site Specific Allocations DPD.

Housing Needs Assessment and GTANA

The Housing Needs Assessment 2007⁶⁸ states that a Local Housing Assessment is needed to evaluate the housing needs of Gypsies and Travellers.

Haringey is also covered by the North London SHMA 2009/2010, which mentions the GTANA requirements for additional pitches in the region (minimum 7, maximum 66 for 2007-2017).

Housing Strategy

The Housing Strategy 2009-2019⁶⁹ does not mention Gypsies and Travellers.

⁶⁶ http://www.haringey.gov.uk/site_allocations_dpd_-_may_2010.pdf

⁶⁷ http://www.haringey.gov.uk/lb_haringey_annual_monitoring_report_2010-11.pdf

⁶⁸ http://www.haringey.gov.uk/haringey_housing_needs_assessment_2007.pdf

⁶⁹ http://www.haringey.gov.uk/haringey_housing_strategy_2009-2019.pdf

Harrow

West sub-region

Core Strategy

The Core Strategy⁷⁰ (adopted February 2012) sets a target for 3 additional pitches to be provided by 2017/2018, according to the 2008 London GTANA, and provides a list of criteria for new sites. The sites will be provided in conjunction with the local Gypsy and Traveller community and the West London Housing Partnership and it is expected that the engagement process will also bring forward initiatives to support Gypsies and Travellers living in brick and mortar accommodation.

Gypsy and traveller accommodation

Y. The Council will work with the West London Housing Partnership and the Gypsy and Traveller community in Harrow to address the local requirement for a minimum of 3 pitches, as identified in the London Boroughs' Gypsy and Travellers Accommodation Needs Assessment (2008). The Council will support proposals for Gypsy and Traveller sites that contribute to meeting identified local needs. Proposals for new and replacement provision will need to satisfy the following criteria:

- the need for suitable and safe access to and from the site for the types of vehicles that could reasonably be expected to use or access the site;
- the ability to provide the site with essential services, such as water, sewerage and drainage and waste disposal;
- the impact on the local environment, including any relevant policy designations for or adjacent to the site that would restrict its use for any type of housing (including but not limited to: Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area; and
- the need to avoid areas subject to risk from flooding; and
- the proximity to shops, services and community facilities, such as schools.

The Council will work with the local Gypsy and Traveller community and the West London Housing Partnership to address Harrow's Gypsy and Traveller accommodation needs for three pitches as identified in the London Boroughs' Gypsy and Travellers' Accommodation Needs Assessment (2008). The outcome of this engagement will inform the preparation of an addition to the address any identified needs of this community, including the provision of additional social support to those who have an aversion to 'brick and mortar' accommodation but nevertheless have their housing needs met in this way; as well as replacements sites to be taken forward through the Site Allocations DPD. In the interim, should proposals for Gypsy and Traveller sites come forward, Core Policy 1 includes criteria for assessing site suitability.

⁷⁰ http://www.harrow.gov.uk/info/856/local_development_framework__policy/2337/core_strategy_2011/6

Development Plan Documents

The Site Specific Allocations DPD presubmission⁷¹ (consulted on between 27 July and 7 September 2012) identifies a site at Watling Farm to provide the minimum of three additional pitches required in the Core Strategy.

Annual Monitoring Report

The AMR 2010/11⁷² states that no additional pitches were provided.

Housing Needs Assessment and GTANA

The Harrow Housing Needs Survey⁷³ (2006) does not cover Gypsy and Traveller needs.

Harrow is also covered by the West London SHMA (2010), which does not mention Gypsy and Traveller issues.

Housing Strategy

The Housing Strategy⁷⁴ (2007/12) mentions a Gypsy and Traveller Strategy is being drafted, with the following priorities:

Priority One – to provide strategic direction and coordination across the Council and its partners

Priority Two – to improve the access and responsiveness of mainstream services

Priority Three – to develop understanding and cohesion between communities

Priority Four – to look at options to meet the needs identified by the Gypsy and Traveller Accommodation Assessment, including redevelopment of Watling Farm site

Priority Five – to improve the management of the Council's Gypsy and Traveller site

⁷¹

http://www.harrow.gov.uk/info/856/local_development_framework__policy/2654/development_management_policies_area_action_plan_and_site_allocations_consultation/4

⁷² http://www.harrow.gov.uk/downloads/file/10775/harrow_annual_monitoring_report_2010-2011

⁷³ http://www.harrow.gov.uk/downloads/download/1348/harrow_housing_needs_survey_2006

⁷⁴ http://www.harrow.gov.uk/site/scripts/download_info.php?downloadID=1202&fileID=3403

Havering

North East sub-region

Core Strategy

The borough's Core Strategy⁷⁵ (adopted 2008) covers Gypsy and Traveller accommodation issues in Policy DC8 Gypsies and travellers, which sets out a detailed list of criteria for new sites. It states that sites within the Green Belt would be permitted in exceptional circumstances, if they do not have an impact on its openness, recreational and agricultural uses. An extract from the 2004 local Gypsy and Traveller needs assessment is provided, describing the distribution of Gypsies and Travellers in the borough across authorised and unauthorised sites, as well as public sector housing. No targets for provision are set out, however, the policy implementation involves a separate Gypsy and Traveller DPD that will identify sites to accommodate need.

DC8 - GYPSIES AND TRAVELLERS

Planning permission will only be granted for gypsy/traveller sites provided all the following criteria are satisfied:

- The proposal meets identified need with regard to the traveller needs assessment/local housing needs assessment
- It is suitable for mixed residential and business uses and has no adverse impact on the safety and amenity of the occupants and their children and neighbouring residents
- It has safe and convenient access to the road network and would not cause a significant hazard to other road users
- It is located within reasonable distance of services and community facilities in particular schools and essential health services
- It has provision for parking, turning, service and emergency vehicles and servicing of vehicles
- It is capable of accommodating the number of caravans/mobile homes proposed with any equipment for business activities
- The site will be supplied with essential services such as water, power, sewerage and drainage, and waste disposal.

Sites within the Green Belt will only be acceptable in exceptional circumstances and where through their design, layout and landscaping they minimise its impact on the openness of the Green Belt, do not prejudice the purposes of including land in the Green Belt, do not prejudice the recreational usage of the Green Belt or involve the loss of high grade agricultural land.

⁷⁵ http://www.havering.gov.uk/Documents/Final_CS_and_DC.pdf

REASONED JUSTIFICATION

- . 1.1 The Council carried out a gypsy/traveller needs assessment during 2004. The survey identified 33 gypsy and traveller families dispersed across the borough. Of these:
 - 19 live on privately owned but green belt land unauthorised for traveller occupation
 - Only 7 families live on private authorised traveller sites
 - 7 families are housed in public sector housing
- . 1.2 The criteria presented in the this policy have been defined with regard to best practice criteria from Annex C of ODPM Circular 1/2006 'Planning for Gypsy and Traveller Caravan Sites', and the Council considers that these are fair, reasonable, realistic and effective. The Circular makes clear that applications cannot be refused because provision in the area is adequate.
- .

IMPLEMENTATION

- . 1.3 A separate Gypsy and Travellers DPD will identify sites to meet the identified needs of gypsies and travellers.

Development Plan Documents

The Gypsy and Traveller Sites DPD⁷⁶ (submitted March 2012) provides a local needs assessment and identifies sites to meet this need in accordance to the criteria set out in the Core Strategy. The needs assessment is an update of an earlier Gypsy and Traveller accommodation assessment carried out in 2004. It states there are currently 74 pitches in the Borough, out of which 12 have permanent permission, 37 have temporary permission, 11 had previously had temporary permission and 14 are unauthorised, and recognises a projected growth of the community with 40 new households by 2027. However, the document addresses only current need and does not take into account the GTANA findings. It identifies sites for 17 additional pitches and another 45 pitches that have expired or temporary permission, which are considered suitable for Gypsy and Traveller accommodation, subject to planning permission. The DPD also provides a detailed site allocation schedule, including specific criteria for the 17 additional pitches.

⁷⁶ <http://www.haverling.gov.uk/SiteAssets/Pages/Gypsy-and-Traveller-Sites-DPD/Proposed%20Submission%20Document.pdf>

Policy GTS1: Provision of Permanent Gypsy and Traveller Pitches

The Council has identified sites for 17 pitches to meet the identified priority need for additional Gypsy and Traveller accommodation in Havering. In addition, 45 existing pitches on sites which have, or have previously had, temporary planning permission have been identified as suitable for Gypsy and Traveller accommodation subject to planning permission.

Up to December 2015 planning permission will only be granted to Gypsies and Travellers who were resident in Havering at the time of the Issues and Options Report consultation in June 2011.

All planning applications for Gypsy and Traveller sites will be considered against Policy DC8 and other relevant policies in Havering's Core Strategy and Development Control Policies DPD. Additionally, the government good practice guidance on Designing Gypsy and Traveller Sites should be reflected in all planning applications.

Business uses will not be allowed on Green Belt sites except for stables where planning permission has previously been granted.

Site specific criteria are set out in the individual site allocation policies in this DPD.

Annual Monitoring Report

The Annual Monitoring Report⁷⁷ for 2010/2011 states that no additional pitches were granted planning permission in the review year and describes current provision. A detailed needs assessment and site allocation will be provided in the Gypsy and Traveller DPD.

No permanent permissions have been granted for additional Gypsy and Traveller sites in 2010/11 or since.

As of September 2010, there were 12 pitches with permanent planning permission in the borough; 37 with temporary planning permission; and 25 that were unauthorised. Of the unauthorised pitches, 11 had previously been granted temporary permission that has now expired, or have been granted temporary planning permission since September 2010. These temporary permissions have been granted for three to five year periods, and are only granted on appeal. The Gypsy and Traveller Sites DPD will seek to identify sites to accommodate those families currently living in Havering. Subject to the adoption of the DPD, families will be required to apply for permanent planning permission in line with the DPD and other policies.

⁷⁷

<http://www.havering.gov.uk/SiteAssets/Pages/Localdevelopmentframework/Annual%20Monitoring%20Report%202010-11.pdf>

Housing Needs Assessment and GTANA

Havering is covered by the East London Strategic Housing Market Assessment (2010) which reports the Borough level need for pitches given in the London GTANA [2008] but does not set any targets for provision.

A Traveller Needs Assessment (2004-2005)⁷⁸ was carried out in 2004 and offers a detailed description of the existing Gypsy and Traveller community, including existing provision, health issues, education, occupations and travelling patterns.

Housing Strategy

The Housing Strategy for 2009/2010-2011/2012⁷⁹ does not mention Gypsy and Traveller accommodation.

⁷⁸ <http://www.havering.gov.uk/media/pdf/4/i/TNA.pdf>

⁷⁹ <http://www.havering.gov.uk/Documents/Housing%20Strategy%202009-12%205%20Mar%2010%20FINAL.pdf>

Hillingdon

West sub-region

Core Strategy

The Core Strategy has not been adopted yet, but the Pre-Submission version⁸⁰ (February 2011) was examined in public between March and May 2012. The Pre-Submission version covers Gypsy and Traveller issues in Policy H3 Gypsy and Traveller Pitch Provision. The policy protects the existing site at Colne Park and sets out criteria for new sites, which will be identified in a future Site Allocations DPD. Targets are to be set in accordance with the Replacement London Plan. Progress will be monitored through Core Indicator H4 Net additional pitches

Policy H3 Gypsy and Traveller Pitch Provision

The Council will ensure that:

- a) The existing Colne Park site will be protected for its current use
- b) Targets for additional pitch provision take account of need and the availability of suitable sites; and
- c) Proposals for sites to accommodate the specific needs of Travellers (Irish and Scottish), Gypsies, Roma, Sinti and Travelling Show People should:
 - i) Be located on a site and in an area that is environmentally acceptable for residential occupation;
 - ii) Have no significant adverse effects on the amenity of occupiers of adjoining land;
 - iii) Have acceptable road and pedestrian access and be accessible to local services and public transport; and
 - iv) Be consistent with other relevant LDF policies.

6.32 Policy 3.8 of the Replacement London Plan (2009) contains borough specific gypsy and traveller pitch provision targets, to be met over the period 2007-2017. The proposed minor alteration to policy 3.8 is currently open for public comment and proposes to remove these targets from the Plan. Under the provisions of the proposed policy, boroughs would be required to work with the Mayor to ensure that needs are identified and the accommodation requirements of these groups are addressed locally and in line with national policy.

6.33 In formulating its policy on this issue, the Council will balance the need for additional pitch provision with the availability of suitable sites. The identification of suitable sites may require the preparation of additional evidence base as part of the production of the subsequent Site Allocations DPD.

⁸⁰ http://www.hillingdon.gov.uk/media/pdf/e/n/SD1-_Core_Strategy_Pre-Submission__February_2011.pdf

Implementation

- Retention of the existing site at Colne Park;
- and traveller pitch provision to guide the provisions of policy CP3.

Taking ac

Flexibility

Figures for gypsy and traveller pitch provision are likely to be refined through the progression of the Replacement London Plan (2009).

Monitoring

H4 (Core) Indicator: Net additional pitches (Gypsy and Traveller). Target to be set by the London Plan

Meeting the needs of the existing travelling community in the borough by protecting and maintaining the site at Colne Park; and

The delivery of pitches in accordance with the outcome of the Replacement London Plan (2009) EIP.

Development Plan Documents

A Site Allocations DPD and Development Management DPD are currently being produced.⁸¹

Annual Monitoring Report

The Annual Monitoring Report for 2010/2011⁸² states that no additional pitches were delivered in the review year and targets will be set in accordance to the 2011 London Plan. The report also mentions current the current provision of one site comprising 35 caravans.

Housing Needs Assessment and GTANA

The Hillingdon Housing Market Assessment 2008⁸³ reports the GTANA estimates of need for 3-35 pitches until 2012 and an additional 3-8 pitches by 2017. It states that further work is being carried out by the West London Housing Partnership to assess the needs of Gypsies and Travellers living in brick and mortar housing.

8.42 The following table shows the projected need for residential pitches in Hillingdon, over

⁸¹ <http://www.hillingdon.gov.uk/article/11414/Local-Development-Framework>

⁸² http://www.hillingdon.gov.uk/media/pdf/r/9/London_Borough_of_Hillingdon_AMR_2010_-_2011_on_the_web.pdf

⁸³ http://www.hillingdon.gov.uk/media/pdf/i/3/Hillingdon_Housing_Market_Assessment_Main_Report_Final.pdf

the 2007-2017 period. The report stresses that these figures are evidence of need and are not targets for new provision. The minimum need figures are based on overcrowding, planned moves and newly forming family units on existing sites; the maximum need figures additionally incorporate transfer to sites from housing. The table shows the minimum need in 2007-2012 is for 3 residential pitches, the maximum need is for 35 pitches. For the period 2012-2017, the minimum and maximum need is for 3 and 8 pitches respectively.

8.43 In addition the table shows the projected changes to the overall Gypsy and Traveller population in housing, depending on whether the minimum or maximum number of pitches is provided in 2007-2012. Where the maximum number of pitches is provided, the required level of housing is lower than if only the minimum pitches are provided. This is because housing units are freed up as housed Gypsies and Travellers transfer to sites. In Hillingdon, for the period 2007-2012, there is a negative need for housing units where the maximum number of pitches is provided. This is because providing pitches will lead to a net a transfer from housing and so free up additional units.

Housing Strategy

The Hillingdon Housing Strategy for 2007/10⁸⁴ describes the current provision of one council owned site comprising 20 pitches and states that an application for Government funding to refurbish the site was made in 2006. The strategy mentions that the London GTANA will be carried out.

⁸⁴ http://www.hillingdon.gov.uk/media/pdf/d/1/housing_strategy07_10.pdf

Hounslow

West sub-region

Core Strategy

Hounslow's Draft *Preferred Core Strategy 2013-28*⁸⁵ [Jul 2011] references Gypsies and Travellers just once as follows:

H.9 Gypsy and Traveller Provision

H.9.1 The Council recognises the future housing needs of its Traveller communities. We will work with our sub-regional housing partnership (North-West London)⁸⁶ to make provision for the identified need of 40-43 pitches.

The target mentioned is for the sub-region of 7 Boroughs. LGTU believes this (West) sub-regional figure is derived from the *London GTANA* [2008] (table 12.22) 'minimum need' of 44 new pitches 2007-17 or the first *Minor Alteration to the DLRP*⁸⁷ [Mar 2010] proposed target of 37 new pitches 2007-17. Hounslow's share of this is some 4-6 pitches. This does not include the need for new Travelling Showpeople's yards which the *London GTANA* [2008] estimates as 52 for the sub-region with the majority in Hounslow.

The next draft is due out between July and Oct 2012 for the next round of consultation.

Development Plan Documents

The Borough is currently producing its development plan documents. There has been a first "call for sites" for the site allocation DPD⁸⁸.

Annual Monitoring Report

The only mention made in the *Hounslow Annual Monitoring Report for 2010-2011*⁸⁹ is to state that no additional gypsy-traveller pitches were developed during the year.

Housing Needs Assessment and GTANA

Hounslow is covered by the *West London Strategic Housing Market Assessment 2010 - Report of Study Findings* [Nov 2010] mentions how the London GTANA was undertaken, but does not provide the findings.

There is no Borough-specific GTANA

⁸⁵ http://www.hounslow.gov.uk/core_strategy_jul11.pdf

⁸⁶ LGTU believes this is meant to refer to the West London Housing Partnership area

⁸⁷ <http://www.london.gov.uk/shaping-london/london-plan/docs/gt-alt-mar10.pdf>

⁸⁸ Telephone conversation 28/3/12

⁸⁹ http://www.hounslow.gov.uk/annual_monitoring_report_1011.pdf

Housing Strategy

The Hounslow *Housing Strategy -2014*⁹⁰ [Jan 2010] fairly progressive, but indicates that the development of additional pitches is being required by the mayor, showing that this document is out of date. The guidelines laid out here might, therefore, be obsolete.

Hounslow has a different pattern of housing provision for gypsies and travellers compared with other West London authorities. There are relatively more (123) pitches on authorised sites compared with other boroughs but a smaller number (50) in settled housing – Ealing and Hillingdon, for example have three times this. According to recent GLA figures, 55% of the travelling showmen in London are based in Hounslow mainly occupying private pitches.

The draft London Plan and Housing Strategy make recommendations for Gypsy and Traveller provision that set to double the provision over the next 10 years. The London wide Gypsy and Traveller Assessment shows that already Hounslow provides the most significant proportion of existing pitch provision for travelling show people in London, accounting for 55% of all such provision. The target set for Hounslow is to provide between 6 and 17 additional pitches for Travellers, and an additional 27 pitches for show people. The existing need coupled with the mayor's new targets mean increased pressure on provision. We will have to do more work to understand how this need can best be met.

1.3 Tackling needs of Hounslow's Gypsy and Traveller community

The Housing Act 2004 requires local authorities to assess the needs of Gypsies and Travellers in the area and develop strategies to meet the needs. The 2009 London Plan will set out proposed pitch provision for all London boroughs based on the 2008 Gypsy and Traveller Accommodation Needs Assessment (GTAA) in London which identified need for 768 new pitches across London, more than doubling the current number.

The Gypsy and Traveller community in Hounslow: Hounslow currently has one existing authorised site for Gypsies and Travellers and this is Hartlands Travellers Site which has 20 pitches and is managed by Hounslow Homes. Hounslow also has 103 travelling show people families which accounts for 55% of travelling show people in London. Currently there are no unauthorised encampments.

GTAA for Greater London estimated that Hounslow need a maximum of 14 and a minimum of six pitches for Gypsies and Travellers within the 2007-2012 period, and 27 plots for Travelling Show people. Planners have been working with GLA to look at fairly distributing the need for plots for Travelling Show people across London.

Hounslow is working with West London Local Authority partners to research on how needs can be best met given that a large amount of the demand for additional pitches is due to people currently resident in ordinary homes who have a psychological aversion to bricks and mortar.

ACTION 1.3A: Carry out with West London work to look at how needs can be best met and research on how best to assess psychological aversion to bricks and mortar. Report to be delivered by January 2010

ACTION 1.3B: To look at options to meet the needs identified by the Gypsy and Traveller Accommodation Assessment, improving management agreement between Hounslow Homes and Hartland's. To work with planners and West London to identify sites for pitches in line with London plan targets.

90 http://www.hounslow.gov.uk/housing_strategy.pdf

Islington

North sub-region

Core Strategy

Islington's *Core Strategy*⁹¹ [Feb 2011] states that there are no Gypsy and Traveller sites in the Borough and the London GTANA estimates a need for 0-3 pitches to be provided by 2017. The Strategy emphasises the difficulty of identifying suitable sites given the density and high cost of land, but sets out criteria for new sites which would be put forward in the Site Allocations DPD.

Meeting the Housing Challenge

.....

3.3.27 The Core Strategy must include criteria for the location of Gypsy and Traveller sites. Islington is currently one of seven London boroughs with no such sites, although there may be some families in permanent accommodation who consider themselves to be Gypsies/Travellers and may need to return to non-fixed accommodation in the future. The council has worked with the Greater London Authority on a study of Gypsy and Traveller needs assessment for London. This has identified Islington as having a minimum need for zero pitches and a maximum need from Gypsies and Travellers currently living in housing for three pitches between 2007 and 2017 (which equates to a land requirement of approximately 0.1 hectares).

3.3.28 The council will seek to identify any possible sites in the Site Specific Allocations, or failing that, will work on a sub regional basis to try and satisfy the identified need. The council will work actively with our development partners to seek to deliver a site for Gypsies and Travellers as required by government policy. Islington faces a specific set of circumstances- such as extreme competing development pressures, shortage of vacant sites and very high land values - which will need to be addressed before the sites can be delivered. The council shall work to promote harmonious relations between the settled community and any future Gypsy and Traveller site in the borough, and shall work towards proper site management in line with the principles of good housing management.

Policy CS 12: Meeting the housing challenge

Islington will meet its housing challenge, to provide more high quality, inclusive and affordable homes by:

....

- K. Considering the allocation of sites for **Gypsy and Traveller accommodation**, based on the limited need identified in the borough. Any site will need to:
- have suitable access for the type of vehicles that could reasonably be expected to use the site
 - be able to provide basic amenities, water, sewerage etc
 - be suitable for housing (that it does not experience unacceptable levels of noise for example)

⁹¹ Islington Core Strategy (2011)

http://www.islington.gov.uk/Environment/Planning/planningpol/local_dev_frame/pol_corestrat/

- not have any relevant pre-existing policy designations that restrict the use of the site such as Metropolitan Open Land.

Appendix 3: Monitoring⁹²

Indicator: Net additional pitches (Gypsy and Traveller accommodation).

Target: **No current target.**

Development Plan Documents

Neither of the Proposed Submissions [Oct 2011] *Development Management Policies*,⁹³ and *Site Allocations*⁹⁴ refers to Gypsy and Traveller needs.

Annual Monitoring Report

The *AMR 2010-11*⁹⁵ states that no additional pitches were delivered in the review year and that there is no current target for future provision.

Indicator: Progress Core Strategy 12.12: Net additional pitches (Gypsy and Traveller)

Target: **No current target**

Progress: Insufficient or no comparable data to determine progress

5.91. In 2010/11 no Gypsy and Traveller pitches were delivered in Islington, which also has no existing pitches (either authorised or unauthorised).

5.92. There was no target for Gypsy and Traveller pitches to assess performance against, nor have any been introduced in the 2011 London Plan, which takes the approach of enabling boroughs and stakeholders to meet required needs in light of local circumstances.

5.93. In the lead up to the preparation of the London Plan, the council worked with the Greater London Authority and other boroughs on a Gypsy and Traveller Accommodation Assessment (GTAA). The March 2008 final report by Fordham Research identified that Islington had zero need for pitches generated from gypsies and Travellers currently living on sites, through overcrowding, unauthorised encampments and new family formation.

⁹² Core Strategy p138

⁹³ Development Management

[http://www.islington.gov.uk/publicrecords/Documents/Environment/Pdf/ldf_pack/Autumn_2011/Development_Management_Policies_Oct_2011_\(low_res\).pdf](http://www.islington.gov.uk/publicrecords/Documents/Environment/Pdf/ldf_pack/Autumn_2011/Development_Management_Policies_Oct_2011_(low_res).pdf)

⁹⁴ Site Allocations Oct 2011

http://www.islington.gov.uk/publicrecords/Documents/Environment/Pdf/ldf_pack/Autumn_2011/Site_Allocations_PS_low_res.pdf

⁹⁵ Annual Monitoring Report (2011)

http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/ldf_pack/Autumn_2011/AMR-2011-2.pdf

Housing Needs Assessment and GTANA

Islington is covered by the *Strategic Housing Market Assessment for North London 2009/10* [Feb 2011] which reports the London GTANA [2008] findings with the proviso “these figures are only draft and are being actively challenged”. The subsidiary *Local Area Report*⁹⁶ [Mar 2011] for Islington makes no mention of Gypsy and Traveller needs.

Islington's own *Housing Needs Assessment 2008*⁹⁷ [May 2008] makes only one reference to gypsies or travellers: as a part of 'Appendix A5 Survey Questionnaire', it asks “Do you consider yourself a gypsy? ... Yes/No” (page, 174). There is no mention of the results of the questionnaire or any other mention of gypsies or travellers.

There is no Borough-specific GTANA.

Housing Strategy

The *Housing Strategy 2009-14*⁹⁸ [May 2009] does not mention Gypsy and Traveller needs.

Other

Gypsy and Travellers are potentially affected by Islington's *Housing Diversity and Equality Strategy Action Plan*⁹⁹ [Apr 2006] which outlines targets to satisfy the housing needs of Black and minority ethnic groups.

Meeting Housing Needs and Aspiration

Action: Establish a clear understanding of BME Community housing accommodation needs

Action: Provide clear information to Community Organisations on how housing is allocated

Action: Ensure that services provided by repairs contractors to BME tenants are: Free from discrimination, Easy to use, sensitive to cultural differences, In line with set service standards.

Action: Ensure all BME Communities are fully consulted in terms of changes/improvements to housing service

All Target Dates: Ongoing

⁹⁶ N London SHMA, Local Area Report
http://www.islington.gov.uk/publicrecords/documents/Environment/Pdf/ldf_pack/Islington_SHMA.pdf

⁹⁷ Islington housing Needs assessment (2008)
http://www.islington.gov.uk/DownloadableDocuments/Housing/Pdf/Housing_Needs_Survey_2008.pdf

⁹⁸ Islington Housing Strategy (2009-2014)
http://www.islington.gov.uk/DownloadableDocuments/Housing/Pdf/hsg_strat_2009.pdf

⁹⁹ Page 7, Valuing Diversity, Delivering Equality
<http://www.islington.gov.uk/publicrecords/documents/housing/pdf/islingtonhousingdiversityandequalitystrategyactionplan.pdf>

Kensington and Chelsea

West sub-region

Core Strategy

The *Core Strategy*¹⁰⁰ [Dec 2010] acknowledges the 2008 GTANA's finding that the borough would need additional pitches, claiming that a future DPD will address this necessity.

Future Documents

1.3.13 Separate Development Plan Documents will be produced for Gypsies and Travellers

8.3.21 The Westway Travellers' site is accessed from under the Westway Roundabout, near the Westway Sports Centre. This site has been used as a gypsy and travellers site for many years. Improving access to the site is a current ambition of the Council. The Council is also committed to exploring options to provide additional gypsy and travellers pitches in this area.

Policy CH 2 Housing Diversity

35.3.31 A London-wide gypsy and traveller needs assessment has identified that there is a need to provide an additional 6 to 12 gypsy and traveller pitches in the Borough for the period 2007-2017²⁸. The shortage and high cost of land means that there will be limited opportunities for new gypsy and traveller pitches. However, the Borough will work with partners, RSLs, developers and neighbouring authorities to meet the identified need. A site(s) will be allocated as part of a forthcoming specific Gypsy and Traveller DPD.

The Council will ensure new housing development is provided so as to further refine the grain of the mix of housing across the Borough. To deliver this the Council will, in relation to:

Gypsies and Travellers

- s.** **protect the existing Westway Travellers' site** which the Council jointly manages with the London Borough of Hammersmith and Fulham. **Additional sites for temporary or permanent use will be identified in the forthcoming Gypsy and Traveller DPD** and should meet the following criteria:
- i. the site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;
 - ii. use of the site would have no significant detrimental effect on the amenity of occupiers of adjoining land;
 - iii. use of the site would be acceptable in terms of the visual amenity;
 - iv. the use could be supported by adequate physical and social infrastructure in the locality.

100 <http://www.rbkc.gov.uk/planningandconservation/planningpolicy/corestrategy.aspx>

Development Plan Documents

There are no Development Plan Documents uploaded on the Council's website.

Annual Monitoring Report

The *AMR 2010-11*¹⁰¹ states that no additional pitches were provided and mentions the uncertainty created by the alterations to the London Plan.

H4 Net additional pitches (Gypsy and Traveller)

There have been 0 additional pitches in the reporting year. Analysis: The UDP policy resists new Gypsy and Traveller pitches, whereas the London Plan encourages them. The Core Strategy resolves this tension with Policy CH2(s) aimed at identifying additional or alternative sites. Further minor alterations to the London Plan are proposed and these have been subject to the London Plan examination process.

Housing Needs Assessment and GTANA

Kensington and Chelsea is covered by the *West London Strategic Housing Market Assessment 2010 - Report of Study Findings* [Nov 2010] which explains the policy context created by the 2011 Replacement London Plan and how the London GTANA was undertaken.

The Boroughs own *Strategic Housing Market Assessment*¹⁰² [Nov 2009] gives an extensive description of the process of the London GTANA [2008] culminating in a report of its findings for pitch need arising in the borough.

Housing Strategy

The Borough's Core Strategy is not available on the Council's website.

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http://uk.sitestat.com/rbkc/rbkc/s?idoc&ns_type=pdf&ns_url=http://uk.sitestat.com/rbkc/rbkc/s?idoc&ns_type=pdf&ns_url=http://www.rbkc.gov.uk/planningandconservation/planningpolicy/idoc.ashx?docid=27ec8d47-0d4b-48d0-8740-a17895680648&version=-1

102

http://uk.sitestat.com/rbkc/rbkc/s?idoc&ns_type=pdf&ns_url=http://www.rbkc.gov.uk/planningandconservation/planningpolicy/localdevelopmentframework/idoc.ashx?docid=562d46cf-3b04-4842-8332-c7e0e19b9ae7&version=-1

Royal Borough Of Kingston Upon Thames

South West sub-region

Core Strategy

Kingston's Core Strategy¹⁰³ (April 2012) covers Gypsy and Traveller issues in Policy DM16. This protects the existing site at Swallow Park, where there are 15 pitches, with 3 further pitches to be added. Criteria are set for new sites with targets to be identified in a future Gypsy and Traveller DPD.

The Swallow Park site is also mentioned in Policy SB1 South of the Borough Neighbourhood.

Policy DM 16

Gypsy and Traveller Sites

The Council will protect the existing authorised gypsy and traveller plots at the Swallow Park site, Hook Rise and work with sub regional partners to identify provision to accommodate additional plots. It is anticipated a Development Plan will be produced within the first half of the plan period to meet the needs of gypsies and travellers. Proposals for new sites should meet the following criteria:

4. have access to local services including shops, schools, GPs and other health services
5. have good access to and from the public highway, bus routes and other transport modes
6. not be located in areas of high flood risk
7. not be located on contaminated land

Rationale

6.110 Given the limited land availability in the Borough, and the large areas of open land protected and designated as Metropolitan Open Land and Green Belt, opportunities for suitably located gypsy and traveller sites are limited. In order to meet the need for gypsy and traveller pitches within the Borough, the Council will firstly protect the Borough's authorised Gypsy and Traveller Site at Swallow Park in Tolworth, which currently accommodates 15 pitches and is due to be upgraded and expanded to provide three additional pitches. Any applications for new sites should demonstrate that the above criteria can be met and that consideration has been given to the principles of good design (including adequate landscaping) in the layout of the site.

¹⁰³ http://www.kingston.gov.uk/proposed_adopted_core_strategy.pdf

Development Plan Documents

A Gypsy and Traveller DPD¹⁰⁴ providing a needs assessment is currently being prepared.

Gypsy and Traveller Development Plan Document

[Home](#) | [Environment and Planning](#) | [Planning](#) | [Planning Policy](#) | [Local Development Framework](#) | [Gypsy and Traveller Development Plan Document](#)

Purpose

The Gypsy and Traveller DPD will assess the needs of the Gypsy and Traveller communities in terms of numerical pitch provision and the quality of pitch, as defined by the Gypsy and Traveller communities. It will undertake a site search in order to gain achievable, available and suitable site(s) to meet that need.

The Gypsy and Traveller DPD is a land use document and will not deal directly with matters of social exclusion relating to health, education and employment inequalities.

Content

The DPD will report on the current accommodation provision for the Gypsy and Traveller communities within the Royal Borough of Kingston and the anticipated future need over a 15-year time period. It will report on the search for suitable sites. Should additional accommodation be required it will designate a site(s).

Timetable

Stage	Date
Evidence Gathering and Stakeholder Involvement	January - September 2012
Six-week Consultation	September - October 2012
Publication	May - June 2013
Submission	December 2013
Examination	February - April 2013
Inspector's Report	March 2014
Adoption	May 2014

Annual Monitoring Report

The Annual Monitoring Report for 2010/2011¹⁰⁵ states that the Swallow Park site has increased in capacity with three additional pitches which were granted planning permission in 2009/2010. It does not set any future targets.

¹⁰⁴

http://www.kingston.gov.uk/browse/environment/planning/planningpolicy/local_development_framework/gypsy_dpd.htm

¹⁰⁵ http://www.kingston.gov.uk/final_low_res_version_14.12.11.small.pdf

Housing Needs Assessment and GTANA

The 2009 Kingston Strategic Housing Market Assessment¹⁰⁶ does not mention Gypsy and Traveller needs.

Kingston is also covered by the South West SHMA¹⁰⁷ (2009/2010), which makes a reference to the maximum Gypsy and Traveller pitches requirement for 2007-2017 based on the 2008 GTANA¹⁰⁸.

Housing Strategy

The Housing Strategy for 2011-2015¹⁰⁹ (October 2011) mentions the GTANA (2008) minimum (12) and maximum (25) requirements for additional Gypsy and Traveller Pitches. It also reports the budget spent on providing housing support through the Supporting People Programme and refurbishing the Gypsy and Traveller sites at Swallow Park.

Other

Gypsy and Traveller Support Service¹¹⁰

The Council provides a support service for Gypsies and Travellers regarding housing, tenancy and maintenance issues. It also offers advice and guidance on access to medical services, education and benefits.

¹⁰⁶ http://www.kingston.gov.uk/shma_kingston_compact_report-2.pdf

¹⁰⁷ <http://www.swlhp.org.uk/archive/strategies/SHMA%20January%202012.pdf>

¹⁰⁸ <http://www.westlondonhousing.org.uk/uploads/London%20GTANA%20final%20report.pdf>

¹⁰⁹ http://www.kingston.gov.uk/housing_strategy_2011_to_2015_on_web.pdf

¹¹⁰ http://www.kingston.gov.uk/browse/housing/housing_support_services/gypsy_and_traveller_support_service.htm

Lambeth

South West sub-region

Core Strategy

The for Lambeth *Core Strategy*¹¹¹ [Jan 2011] protects the existing Lonesome Depot site in Streatham Vale providing 15 pitches and sets a target to provide 10 additional pitches by 2025. These will be identified in the Site Allocations DPD, with regard to a brief list of criteria set out in the Core Strategy.

Section 2 - Evidence Base and Issues

Housing

2.16 There are fifteen pitches for gypsies and travellers at the Lonesome Depot site in Streatham Vale and ten additional pitches are required in the borough to meet future need (London Boroughs' Gypsy and Traveller Accommodation Needs Assessment 2008).

.....

Accommodating Population Growth

2.50 Demand for housing will come from a mix of current Lambeth children growing up and forming new households, existing households breaking up into smaller units, adults and families migrating into the borough to find work and a place to live (a strong tradition in this part of London), and **gypsies and travellers**. Lambeth's supply of housing will need to meet the needs of young single people, single older people, couples, growing families, larger extended families, those with social care needs, students and gypsies and travellers (Housing Needs Assessment Update 2007).

Policy S2 – Housing

The Council will meet the borough's housing needs to 2025 by:

(f) Safeguarding existing sites and pitches for use by gypsies and travellers and travelling show-people, **and identifying ten additional pitches** for gypsies and travellers, as well as supporting proposals for other specific types of accommodation such as student, hostel and other forms of specialist housing.

4.12 The Housing Act 2004 requires local authorities to consider the accommodation needs of gypsies and travellers in their local housing assessments. In response to this, the GLA, on behalf of the London boroughs, commissioned the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008). This study identified a requirement for an additional ten pitches for gypsies and travellers in Lambeth, in addition to the existing fifteen pitches at the Lonesome Depot in Streatham Vale. Government Circulars 01/06 'Planning for Gypsy and Traveller Caravan Sites' and 04/07 'Planning for Travelling Showpeople' require local planning authorities to set out criteria for the location of sites for gypsies and travellers and travelling showpeople in their Core Strategies.

111 <http://www.lambeth.gov.uk/NR/rdonlyres/C04824A3-E7DE-4FC9-B04D-FCD97557BB9D/0/CoreStrategyAdoptionVersionJanuary20116December100311.pdf>

4.13 Sites for gypsies and travellers will be sought through the preparation of the Site Allocations DPD and other means as appropriate. This process will have regard to:
the need for safe access to the road network;
impact on the local environment and the character, safety and amenity of the area;
the availability of services such as water, sewerage and drainage and waste disposal;
proximity to shops, services and social and community facilities; and
the need to avoid areas at high risk of flooding.

Development Plan Documents

The consultation draft *Issues and Options Site Allocations DPD*¹¹² [June 2009] no such references are found, except for a brief passage on page 8 asking people to identify potential pitch sites to the council:

We would also like to invite you to suggest additional sites for potential development or redevelopment, which you think should be included within this document, particularly for additional schools, waste management/green industry and gypsy and traveller sites.

Annual Monitoring Report

The *AMR 2010-2011*¹¹³ describes the policy context created by the 2011 Replacement London Plan and national planning policy on Gypsy and Traveller sites. It states that no additional pitches were delivered in the review year, however the Core Strategy sets a target to provide 10 new pitches by 2017. These will be identified in the Site Allocations DPD.

4.5 Gypsies and Travellers

- 4.5.1** The 2008 London Plan stated that boroughs, in co-ordination with neighbouring boroughs and districts, should assess the accommodation needs of gypsies and travellers and review the pitch capacity of each borough. London Plan 2008 Policy 3A.14 also required DPD policies to protect existing sites; identify the number of additional pitches to be provided; and set out criteria for identifying the suitability of new sites. Core Strategy Policy S2(f) therefore safeguards existing sites for pitches for use by gypsies and travellers and travelling show people, and identifies the need, set out in the London Plan 2008, for ten additional pitches for gypsies and travellers. The Core Strategy states in paragraph 4.13 that sites for gypsies and travellers will be sought through the preparation of the Site Allocations DPD and other means as appropriate.
- 4.5.2** This involves provision of seven additional pitches between 2007 and 2012 and a further three pitches by 2017. No new gypsy and traveller pitches were delivered in the reporting year.
- 4.5.3** The policy position and local authority requirements relating to gypsies and travellers

112 <http://www.lambeth.gov.uk/NR/rdonlyres/5EEDBCD1-09EB-4660-8733-4B748D2F56C3/0/SiteAllocationsDPDIntroduction.pdf>

113 <http://www.lambeth.gov.uk/NR/rdonlyres/A101D8B2-BA50-41A1-8782-97B1B7BFE89E/0/AMR201011.pdf>

are changing both at a national and regional level. Unlike the 2008 Plan, the London Plan 2011 does not include detailed policies regarding provision for gypsies and travellers and travelling show people. Policy 3.8 in the 2011 Plan requires boroughs to identify and address the accommodation requirements of gypsies and travellers (including travelling show-people) in line with national policy, in co-ordination with neighbouring boroughs as appropriate. Paragraph 3.56 expands on this and states that “in London as in the rest of the country, the impact of provision to meet these needs is essentially local and, as government now proposes nationally, should properly be addressed by local planning authorities in DPDs”.

- 4.5.4** National policy is currently under review and a consultation document has been published that, once adopted, would replace existing government circulars on gypsies and travellers. The proposed new policy would enable local planning authorities to make their own assessments and set their own pitch/plot targets. **In this context, Lambeth would now be expected to undertake its own assessment of the requirement for pitches and would not necessarily be required to identify ten additional pitches** based on the GLA's 2008 Londonwide assessment. The future position on gypsies and travellers will be reported in next year's AMR.

Housing Needs Assessment and GTANA

Lambeth is covered by the *South West London Strategic Housing Market Assessment* [Jan 2012] which simply states the London GTANA estimated need for additional pitches.

There is no Borough-specific GTANA

Housing Strategy

Lambeth is currently producing a new Housing Strategy for the years 2012-2016, but the previous *Housing Strategy 2009-2013*¹¹⁴ states that:

The 2004 Housing Act requires local authorities to assess the need for gypsy and traveller accommodation. In 2007 a pan London study identified an undersupply of gypsy and traveller sites. Currently in Lambeth there is one site with 15 pitches in Streatham and the study suggests that two further pitches are required. The council is working with our South West London partners to address this need.

114 <http://www.lambeth.gov.uk/NR/rdonlyres/6F88A76C-23DA-4A1A-97A5-8228C9BF8BF6/0/HousingStrategy20092013.pdf>

Lewisham

South East sub-region

Core Strategy

The Borough's Core Strategy¹¹⁵ (June 2011) includes a policy on Gypsy and Traveller sites informed by the London Plan (2011) and GTANA (2008) targets. It sets out the criteria for assessing new site proposals. It recognises the need to identify a suitable site to relocate the pitches at Thurston Road, which is being redeveloped, and this will be taken forward through the Site Allocations DPD.

Core Strategy Policy 2

Gypsies and travellers

5. The Council will continue to assess and provide for the identified needs of gypsies and travellers in appropriate locations. The Council is in the process of identifying a suitable site to meet the immediate need arising from the redevelopment of the Thurston Road site, which forms part of the approved Lewisham Gateway development. A site will be identified through the Site Allocations DPD.
6. Proposals for additional and alternative gypsy and traveller sites will be assessed having regard to the following criteria:
 - They have reasonable access to local shops, services and community facilities in particular schools and health services.
 - They are safe and have reasonably convenient access to the road network.
 - They have provision for parking, turning, service and emergency vehicles .
 - Any business activities do not have unacceptable adverse impacts on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site.
 - They have a supply of essential services such as water, sewerage and drainage and waste disposal.
 - They are designed and landscaped to a high standard which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site.

¹¹⁵ <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyAdoptedVersion.pdf>

Development Plan Documents

The Site Allocations Policy DPD 2011¹¹⁶ identifies a suitable site at Church Grove, Ladywell, for relocating 5 pitches from Thurston Road. It states that the Council is seeking additional sites to meet the targets set out in the London Plan and GTANA of 4 additional pitches by 2012 and a further pitch by 2017. It also mentions the needs of travellers with a psychological aversion to bricks and mortar.

B. Gypsies and travellers sites

1. 2.16 The Core Strategy provides a policy for the gypsy and travellers sites. The policy approach is to establish criteria for the identification of additional sites and allocate new pitch provision within the Site Allocations DPD.
2. 2.17 The London Borough's Gypsy and Traveller Accommodation Needs Assessment identified for Lewisham five existing residential pitches and calculated a requirement for four additional pitches by 2012 and a further one by 2017. However, if the needs of traveller families living in standard family accommodation but having a 'psychological aversion to bricks and mortar accommodation' is taken into account the minimum need is calculated as a further twelve pitches with a further nine required by 2017.
3. 2.18 However, the revised figure in the Draft Replacement London Plan, March 2010 proposes that the borough provides eight additional pitches. This is subject to an Examination in Public by an independent Planning Inspector before it can be adopted.
4. 2.19 The Council has identified five pitches at the former Watergate School site in Church Grove, Ladywell to relocate the Gypsies and Travellers site from an existing site at Thurston Road, which is required as part of the Lewisham Gateway redevelopment. The Council is seeking to identify sufficient sites in suitable locations to meet its London Plan requirement.
5. 2.20 A separate consultation document focusing on gypsy and travellers sites is currently being prepared and will be subject to a separate and more focused round of public consultation over the Winter 2010/11.

Annual Monitoring Report

The most recent Annual Monitoring Report is from 2010/2011¹¹⁷, previous to the Site Allocations Policy DPD. It does not provide a target for additional pitches, but it does take into account the targets in the 2011 London Plan and the 2008 GTANA.

¹¹⁶

http://www.lewisham.gov.uk/myservices/planning/policy/Documents/Site_Allocations_2010_Further_Options_Report.pdf

¹¹⁷ <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/AMR201011FinalforMC.pdf>

Housing Needs Assessment and GTANA

The most recent Strategic Housing Market Assessment¹¹⁸ for Lewisham dates from 2007 and does not mention Gypsy and Traveller needs.

Lewisham is covered by the 2009 South East London SHMA¹¹⁹, which does not mention Gypsy and Traveller needs.

However, the Council has commissioned a report that specifically covers these issues. The Gypsy and Traveller Future Needs Assessment (2012)¹²⁰ provides a detailed account of the number of households and the pressures they are facing. While it recognises the demand for new pitches to accommodate some of the families displaced from Thurston Road, it evaluates the actual need for new pitches as being relatively low (between 4 and 9).

Housing Strategy

The Housing Strategy¹²¹ for 2009-2014 recognises the need for suitable additional pitches, based on the 2008 GTANA, but only states the following, without setting future targets:

- 1) We will ensure appropriate accommodation provision for Gypsy and Travellers which meet their needs.

Other

The Council website has a dedicated page¹²² covering Gypsy and Traveller provision, where it mentions the progress made on relocating the sites from Thurston Road and the identification of new sites.

¹¹⁸ <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/LewishamStrategicHousingMarketAssessmentExecutiveSummary.pdf>

¹¹⁹ <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/SouthEastLondonStrategicHousingMarketAssessmentCoreDataReport.pdf>

¹²⁰ <http://councilmeetings.lewisham.gov.uk/mgConvert2PDF.aspx?ID=5882>

¹²¹ <http://www.lewisham.gov.uk/mayorandcouncil/aboutthecouncil/strategies/Pages/default.aspx>

¹²² <http://www.lewisham.gov.uk/myservices/housing/Provision-for-Gypsies-and-Travellers/Pages/Provision-for-Gypsies-and-Travellers.aspx>

Merton

South West sub-region

Core Strategy

The Core Strategy (adopted July 2011)¹²³ protects the existing site and sets out criteria for additional, alternative or new sites which will be delivered through the Site Allocations DPD or Area Action Plans. The Strategy recognises need for additional pitches as identified in the GTANA, but also arising from the Council's waiting list.

Policy CS 10

Accommodation for Gypsies and Travellers

Existing legally established Gypsy and Traveller accommodation sites will be retained and protected from redevelopment except where the same number of pitches is provided on an alternative site. Proposals for additional, alternative or new Gypsy and Traveller sites will be assessed having regard to the following criteria:

- The provision of on-site landscaping, which seeks to enhance the amenity of the site and which facilitates the integration of the site with the surrounding environment and amenity of occupiers of adjoining land;
- Access, proximity to a main road, parking and area to allow turning and manoeuvring;
- Proximity to shops, schools, health services and other community facilities;
- Provision of appropriate on-site facilities such as children's play facilities;
- The suitability of ground conditions, particularly in respect to the potential to flooding;
- The need or demand for accommodation provision and the available capacity on existing sites in the borough.

Justification

18.49 Guidance in Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites calls for a more positive approach to making adequate provision for Gypsies and Travellers. We have one existing authorised Gypsy and Traveller site in the borough. Any new Gypsy and Traveller sites should be adequate and appropriate to the needs of the Gypsy and Traveller communities, and integrated into adjoining communities.

18.50 Fordham Research was commissioned by the GLA for the 32 London boroughs to

¹²³ http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/2011-07-28_core_strategy_adopted.pdf

undertake a Pan London Gypsies and Travellers Accommodation Needs Assessment for the whole of London in 2008. The results of this assessment were broken down to sub-regional and borough level.

18.51 We will conduct a local assessment in collaboration with local Gypsies and Travellers communities to identify accommodation needs. Whatever the level of need that is identified either via a local or subregional needs assessment for Merton, it is considered that there are robust and clear criteria to help deliver additional pitches.

18.52 There is a separate waiting list for pitches in Merton, mainly from second generation and/or newly formed households on the council's existing site at Brickfield Road.

18.53 Additional pitches for Gypsies and Travellers accommodation in Merton will be delivered through the Local Development Framework (Site Allocations DPD or an Area Action Plan) or the Council's asset management or private windfall sites.

18.54 The council encourages the integration of Gypsy and Traveller sites into the surrounding community and environment. Landscaping can also play an important role in facilitating the visual integration of a Gypsy and Traveller site into the surrounding community and environment.

Delivery and Monitoring

The identification and allocation of the borough pitch target to be met through the Local Development Framework (Site Allocations DPD or an Area Action Plan) or via consideration of the Council's asset management or via private windfall sites.

Development Plan Documents

The Draft Sites and Policies DPD (June-July 2012)¹²⁴ does not mention Gypsy and Traveller sites.

Annual Monitoring Report

The AMR 2010/2011¹²⁵ does not mention Gypsy and Traveller provision.

¹²⁴ http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_and_policies_stage_2a_-for_web.pdf

¹²⁵ http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/merton_amr_2010-11_final_report___appendix.pdf

Housing Needs Assessment and GTANA

The Merton Strategic Housing Market Assessment (2010)¹²⁶ mentions the requirements to conduct a local Gypsy and Traveller housing needs assessment, but does not provide one.

2.9 The Criminal Justice and Public Order Act 1994 (Sections 61, 62) is particularly important with regard to the issue of planning for Gypsy and Traveller site provision. This repealed the duty of local authorities to provide appropriate accommodation for Gypsies and Travellers. However, Circular 1/94 did support maintaining existing sites and stated that appropriate future site provision should be considered.

2.10 The accommodation need of Gypsies and Travellers has since been mainstreamed within the wider housing and planning systems. Section 225 of the Housing Act 2004 introduced a statutory duty for local authorities to carry out an accommodation needs assessment of Gypsies and Travellers residing in or resorting to their district. Local authorities are also required to prepare a strategy in respect of meeting such needs under section 87 of the Local Government Act 2003.

2.11 The Planning Circular 01/2006 Planning for Gypsy and Traveller Sites also sets out guidance stating that local planning authorities need to identify appropriate land for Gypsy and Traveller sites through the Development Plan Documents (DPDs) in line with need in their area. The Regional Planning Bodies and Planning Inspectors will require local authorities to produce Needs Assessment reports for Gypsies and Travellers. In London, borough-level targets for pitch provision have been included in the Draft Replacement to the London Plan, which will come into force in 2010.

Merton is also covered by the South West London Strategic Housing Market Assessment described in Appendix B.

Housing Strategy

The Draft Housing Strategy 2012-2015¹²⁷ states that a separate Gypsy and Traveller Strategy is being prepared together with the Gypsy and Traveller community and local partners. The strategy comprising a needs assessment and targets for provision is expected to be published by March 2013.

Other

The Council website has a page dedicated to Gypsy and Traveller sites.¹²⁸

¹²⁶ http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/merton_shma_march_2010.pdf

¹²⁷ http://www.merton.gov.uk/housing/housing-policy-performance/draft_housing_strategy_2012-2015.pdf

¹²⁸ <http://www.merton.gov.uk/housing/housing-policy-performance/gypsy-traveller-sites.htm>

Newham

East sub-region

Core Strategy

Newham's *Core Strategy*¹²⁹ [Jan 2012] covers Gypsy and Traveller accommodation in policy H3 Specialist Accommodation Needs, which sets out a brief list of criteria for new sites. The Strategy states that the needs of Gypsies and Travellers identified in the GTAA will be addressed in a future Site Allocations DPD.

H3 Specialist Accommodation Needs

Objective

6.132 Seek to understand the accommodation needs of a diverse population and make appropriate provision insofar as this would align with the Spatial Vision.

Policy

The council will seek to ensure that the needs of all types of households are considered and that appropriate forms of accommodation are provided where this need has been clearly demonstrated and this aligns with the Spatial Vision.

Development proposals which meet the following criteria will be supported:

1. The accommodation is appropriately located in terms of the needs of its occupants;
2. It does not prejudice the amenities or unique characteristics of the existing neighbourhood;
3. Adequate transport and supporting facilities are provided for the intended occupants;

Site provision for gypsies and travellers to meet the required number of pitches identified in the GTAA, will be progressed through a further DPD/the Site Allocations DPD.

The only other reference¹³⁰ is that the Annual Monitoring Report is meant to measure the net provision of gypsy-traveller pitches

Development Plan Documents

The *Detailed Sites and Policies DPD* will fulfil the functions of the Development Management and Site Allocations DPDs. The *'Issues and Options for the Detailed Sites and Policies DPD'* will be published for consultation in late Spring 2012¹³¹

¹²⁹ <http://www.newham.gov.uk/NR/ronlyres/09585585-7EE1-44BB-BB50-A7DD94017406/0/CoreStrategyAdoptedJanuary2012InterimVersion.pdf>

¹³⁰ page 302.

¹³¹ <http://www.newham.gov.uk/Planning/LocalDevelopmentFramework/DetailedSitesandPoliciesDPD.htm>

Annual Monitoring Report

Newham's Annual Monitoring Report for 2010-2011¹³² makes limited reference to gypsies and travellers, mainly in relation to the devolution of policy to Local Authorities :

7.2.7 Gypsies and Travellers have specific type of accommodations needs which are monitored in terms of pitch numbers provided. Gypsy-Traveller pitches include those for permanent residential use and those for transit use (as temporary stopping places).

.....

7.2.8 In 2010 -11 no additional gypsy-traveller pitches were provided in the borough.

.....

7.4 Review of Changes in the National and London-wide Policy Context

7.4.1 There were no changes in the national policy context relating to housing in 2010-11. However, the Mayor of London issued his final London Plan in July 2011. The main changes relevant to local policies are an increased emphasis on optimising development taking into account local context, whilst **Gypsy-Traveller provision is also left to be tackled locally.**

Open space gains and losses

8.2.10 Open space significantly adds to environmental quality in an urban area, so gains and losses are particularly significant. Records demonstrate that small areas of open space have been lost this [reporting] year, as justified against OS7. Losses included:the loss of park and garden and provision for young people to a gypsy and traveller site (Stratford);... However, substantial gains which will make a real difference in the west of the Borough (notably the Olympic Park) are in the pipeline, in line with policies OS1, OS2 and OS8.

Housing Needs Assessment and GTANA

Newham is covered by the *Strategic Market Housing Assessment for East London 2009/10* [Sept 2010] which simply reports the Borough level need for pitches given in the London GTANA.

Newham's own *Strategic Housing Market Assessment 2010 - Main Report of Study Findings*¹³³ [Aug 2010] only references the pan-London figure in the *London Housing Strategy* [Feb 2010].

There is no Borough-specific GTANA.

¹³² <http://www.newham.gov.uk/NR/rdonlyres/906071B4-498D-451E-A051-5BD77C7D4C73/0/AnnualMonitoringReport201011.pdf>

¹³³ <http://www.newham.gov.uk/NR/rdonlyres/7DDBE238-B647-4E80-BA0A-24DC33965583/0/NewhamStrategicHousingMarketAssessment.pdf>

Housing Strategy

Newham's Housing Strategy *Housing Newham 2011-16*¹³⁴ [Dec 2010] makes no reference to Gypsy or Traveller needs.

Other

The NHS/Newham *Joint Strategic Needs Assessment*¹³⁵ [Jan 2011] gives a sympathetic report of the plight of Gypsies and Travellers but fails to make any policy recommendations.

Gypsies and Travellers

There are a number of distinct groups that are collectively referred to as Gypsies and Travellers. These include English Gypsies (sometimes called Romany Gypsies), Welsh Gypsies, Irish Travellers, Scottish Gypsy Travellers and also Roma gypsies from various countries in mainland Europe. These groups may have differing backgrounds, languages and cultural traditions but also have some common features of lifestyle and culture that separate them from the rest of the UK population. All of these groups are recognised as ethnic groupings under the Race Relations Act 1976. Other groups of Travellers not recognised by the Act include Show-people and New Age Travellers.

It is difficult to establish accurately the number of Gypsies and Travellers in Britain as they were not identified as a separate ethnic group in the 2001 Census. Estimates of the Gypsy and Traveller population in Britain vary widely. A recent estimate from Communities and Local Government estimate that Gypsies and Travellers make up 0.6% of the population (circa 368,000)¹⁹⁸. The number within London has been variously estimated as 13,500 and 30,000.

The ... London Boroughs' Gypsy and Traveller Accommodation Needs Assessment published in 2008 ... shows that Newham has the largest population of Gypsies and Travellers in East London and that a large number of these are living in conventional housing. Across London the numbers of Gypsies and Travellers living in conventional housing outnumber those living on sites. This is reflective of national trends and is considered to be a result of both the lack of suitable caravan sites and a reflection of changing cultures within these communities.

.....

Newham has one authorised site for gypsies and travellers in Parkway Crescent, Stratford. The site has a capacity for 15 pitches and 30 caravans. In terms of health and education, it is known that gypsies and travellers are among the most deprived groups in Britain. Key issues include:

- Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average
- Gypsy and Traveller mothers are 20 times more likely than the rest of the population to

134 <http://www.newham.gov.uk/NR/rdonlyres/CD60D3E6-EA70-4A3C-9F30-6D566EBAA12B/0/Finalnewhamhousingstrategyv7.pdf>

135 <http://www.newham.gov.uk/NR/rdonlyres/A4B9FD10-CC17-491E-8E93-52AF25DE2E25/0/NewhamJSNA2010.pdf>

have experienced the death of a child

- Children's educational achievements are poor and declining further and participation in secondary education is extremely low
- Gypsies and Travellers have significantly poorer health status and significantly higher self reported symptoms of ill health than other English speaking minorities
- Many Gypsy Travellers who tried to access services felt that they had experienced barriers including communication difficulties, a lack of culturally appropriate services and direct discrimination
- Gypsies and Travellers demonstrate a pride in self reliance as well as a fear of illness which may make them reluctant to access health services

The lack of suitable, secure accommodation is considered to be a major factor underpinning the inequalities these communities face. The following table sets out the need for additional housing for gypsies and travellers as estimated by the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment published in 2008.

Redbridge

East sub-region

Core Strategy

The *Core Strategy*¹³⁶ [March 2008] briefly mentions Gypsy and Traveller needs under supporting paragraph 4.8.4 of the Strategic Policy 7 on Housing:

4.8.4 ODPM Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites sets out the planning process for identifying needs and providing sites for gypsies and travellers, and in response the GLA has commissioned a London-wide study. When the results of that study are known, and if the need for a site or sites is established within the Borough, the criteria in Policy H4 of the ***Borough Wide Primary Policies*** will be used to identify sites, or to assess proposals for them.

Development Plan Documents

The *Borough Wide Primary Policies DPD*¹³⁷ [May 2008] protects the existing site at Forest Road, Fairlop and sets out criteria for new sites.

5.4 Travellers & Gypsy Sites Policy **H3 – Travellers & Gypsy Sites**

The Council will give careful consideration to the needs of travellers and gypsies and will retain the existing facilities at Forest Road, Fairlop. Further sites, for temporary or permanent use, will only be permitted when a site would meet an identified need, which cannot be met in any other way and would meet the following criteria:

1. The site provides for an appropriate layout, in terms of pitches, amenity buildings, hardstandings and open spaces;
2. The site has an appropriate means of enclosure and comprehensive landscaping;
3. The use of the site would have no adverse effect on the amenity of occupiers of adjoining land;
4. The use of the site would have no adverse effect on the visual amenity of the locality; and
5. The use can be supported by adequate social infrastructure in the locality

Justification

5.4.1 For the purpose of determining planning applications the Council will use the definition of gypsies and travellers as defined in the ODPM Circular 01/2006 "Planning for Gypsies and Traveller Caravan Sites".

¹³⁶ Redbridge Core Strategy
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework.aspx

¹³⁷ Borough Wide Primary Policies DPD
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework.aspx

Gypsy and Traveller needs are mentioned in neither the *Development Sites with Housing Capacity DPD*¹³⁸ [May 2008], nor the *Development Opportunity Sites DPD*¹³⁹ [May 2008]

The *Local Development Scheme 2010–12*¹⁴⁰ [Feb 2010] states

Development Plan Documents to be prepared during 2010-2012

3.11 The key documents to be prepared within this LDS period are:

.....

- Gypsy and Traveller Sites DPD – which will identify sites for gypsies and travellers.

Annual Monitoring Report

The *AMR 2010–11*¹⁴¹ describes the policy context created by the 2011 Replacement London Plan and states that the Core Strategy Review will address the needs assessment for Gypsy and Traveller accommodation. The progress indicator is Net additional pitches, with a target to maintain the level of current provision (16 pitches). As there was no loss of sites, the AMR concludes that the target has been met.

2.10 Replacement London Plan

2.10.1

The London Plan was published in July 2011 replacing the previous 2008 London Plan (consolidated with alterations since 2004). Boroughs' Local Development Documents have to be in "general conformity" with the London Plan which is also part of the statutory development plan that has to be taken into account when planning decisions are taken in any part of London. The new Plan differs from its predecessor in some important ways that affect Redbridge:

....

- Borough level targets for gypsy and traveller pitch accommodation that were proposed in the initial draft of the plan have been removed. In line with draft national policy boroughs will now set their own targets for this type of accommodation based on evidence of local need.

¹³⁸ Development Sites with Housing Capacity
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/idoc.ashx?docid=967500fa-4bbe-48ba-a388-293cfcfd624f&version=-1

¹³⁹ Development Opportunity Sites
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/idoc.ashx?docid=4253ab77-46bf-488b-ab68-78737f6f937a&version=-1

¹⁴⁰ Local Development Scheme 2010-12
http://www2.redbridge.gov.uk/cms/planning_land_and_buildings/planning_policy_regeneration/local_development_framework/idoc.ashx?docid=d46a3ab1-7d98-48e5-8b64-ce18326d8058&version=-1

¹⁴¹ AMR (2010- 2011)
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework/ldf_monitoring_report.aspx

2.12 Main Recommendations

Overall the main recommendations of the 2010/11 AMR can be summarised as:

.....

- A number of key policy areas for the forthcoming Core Strategy Review have been identified. These policy changes should reflect the replacement London Plan (July 2011) - including the new housing target, provision for Gypsies and Travellers;..... Further to this it is recommended that elements of the Borough Wide Primary Policies DPD be reviewed alongside the Core Strategy in order for there to be a consolidated and fully up to date Local Plan to guide Development Management decisions in the borough.

3.7 Strategic Objective 7: Housing for All

..... *To provide sufficient numbers and range of house types and sizes to meet the diverse housing needs of the Borough's population.*

.....

3.7.2 Policies

.....

3.7.2.6

Policy H3 of the Borough Wide Primary Policies DPD is concerned with Gypsy and Travellers and sets out a number of criteria which any proposed schemes would be assessed against. Recent national Government changes to the legislation on Gypsy and Travellers has changed the policy approach. The Replacement London Plan (July 2011) policy 3.8 on Housing Choice point I states that the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed in line with national policy in coordination with neighbouring boroughs and districts as appropriate. Therefore, through the Core Strategy Review robust evidence will have to be established for the delivery of pitch provision to meet local need.

3.7.3 Performance

.....

3.7.3.9 Gypsy and Travellers

.....

The 16 pitches at the Gypsy and Traveller site in Fairlop have been maintained in 2010/11.

.....

3.7.5 Conclusions and Recommendations

.....

3.7.5.4

Using the GLA Gypsy and Traveller Accommodation Assessment as a starting point the Council needs to take a view as to whether to review levels of Gypsy and Traveller Show People pitch provision as part of the Core Strategy Review. The Replacement London Plan requires planning for Gypsy and Traveller pitch provision to be undertaken at the local level.

Indicator	Target	08/09	09/10
Gypsies and Travellers Net additional pitches.	Maintenance of at least 16 pitches	16	16

Housing Needs Assessment and GTANA

Redbridge is covered by the *Strategic Market Housing Assessment for East London 2009/10* [Sept 2010] which simply reports the Borough level need for pitches given in the London GTANA.

The *Equality Impact Assessment for Housing Needs and Requirements Study 2005- 2006*¹⁴² [Apr 2007] makes some interesting references to Gypsy and Traveller needs regarding their inclusion in the next housing needs study:

Improvements

The next Housing Needs & Requirements Study will be undertaken in year 2010/11. Future housing needs survey may benefit from a number of improvements listed below:

- [a] contribution from a wide range of service areas during survey questionnaire design
- [b] further enquiries into Travellers and Gypsies housing need. A pan-London study is currently being carried out by London Councils.
- [c] as appropriate update BME housing needs study (2004/5) in 2010/11 or incorporate it with the HNRS 2010/11.

.....

A pan-London survey is currently being carried out by London Councils. Final results will be published during the in summer 2007. Locally, a Supporting People Strategy has been produced which has identified the need to understand needs of Gypsies and travellers. The Housing Service will work closely with Supporting People on this.

There is no Borough-specific GTANA.

Housing Strategy

Redbridge does not have an overarching Housing Strategy. There is no mention of Gypsy and Traveller needs in the *Affordable Housing Strategy 2008-11*¹⁴³ [Jul 2008] or the *Housing Service Equality Strategy 2006–10*¹⁴⁴ [Aug 2008].

¹⁴² EIA for Housing Needs and Assessment requirements
http://www2.redbridge.gov.uk/cms/citizens_and_registrations/equality_and_diversity/equality_impact_assessments/community_services_eqias/idoc.ashx?docid=d429d80a-3448-4602-9249-9410d468930d&version=-1

¹⁴³ Affordable Housing Strategy (2008- 2011)
http://www2.redbridge.gov.uk/cms/council_tax_benefits_housing/housing/strategy_and_development/new_housing_in_redbridge.aspx

¹⁴⁴ Housing Services Equality Assessment
http://www2.redbridge.gov.uk/cms/council_tax_and_housing/housing_strategy_and_developme/housing_services_equal_access.aspx

Other

The *Local Development Framework - Equality Impact Assessment*¹⁴⁵ [Nov 2006] states:

Assessment Matrix 6: Housing

Are there any obvious barriers to the service in terms of race, disability, age, gender etc either in the aims and functions of the policy or the way that it is delivered?

The housing needs of one specific group, Travellers and Gypsies, are limited to one identified site, already developed, with a presumption against further sites subject to stringent criteria being met (Borough Wide Primary Policy H4). However, there are limited opportunities for sites at sites identified in the *Development Sites with Housing Capacity* DPD. Consultees for the Preferred Options Stage of the Housing Policy and Development Sites with Housing Capacity DPD included the Traveller Law Reform Coalition who raised no objection.

A page dedicated to 'Travellers'¹⁴⁶ on the website states:

The council recognises and accepts the rights of Gypsies and Travellers to live a nomadic way of life and recognises Gypsies as a racial group.

The council also recognises Government Circulars/guidelines and its statutory duties with regard to Gypsy and Traveller families.

Traveller sites

The council is not able to provide traveller sites/ stopping places to meet the needs of all travellers owing to planning and resource constraints, other than the existing Northview Caravan Site, which is usually full.

Access to services

The council aims to ensure that all people in Redbridge feel they are part of an inclusive society, where all have equal access to services and other facilities. The council confirms the commitment to equal opportunities for all residents and users of services, and to continue adopting services to meet the different needs of all communities.

The council also recognises that all members of the community have the right to enjoy a quality of life that is free of harassment and offensive behaviour and is committed to use the law to tackle all forms of anti-social behaviour.

The Government issues all policies and laws with regard to travellers. These are then adopted into all council procedures.

¹⁴⁵ Equality Impact Assessment
http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework.aspx or
http://www2.redbridge.gov.uk/cms/planning_land_and_buildings/planning_policy_regeneration/idoc.ashx?docid=232542cb-bbf1-490e-bfcb-a665e1af89ba&version=-1

¹⁴⁶ 'Travellers' web page [accessed Mar 2012]
http://www2.redbridge.gov.uk/cms/citizens_and_registrations/moving_to_redbridge/travellers.aspx

Richmond

South West sub-region

Core Strategy

The Borough's Core Strategy¹⁴⁷ (adopted April 2009) recognises the need for 2-11 additional pitches identified in the London GTANA and sets out criteria for new sites in policy CP14. While the difficulty of finding suitable sites due to shortage and high cost of land is emphasised, the Council commits to collaborate with public and private sector partners in order to meet the identified need. The Strategy also protects the existing council owned site at Bishops Grove, providing 11 pitches.

Policy CP14 Housing

14.C Residential proposals will be assessed for the contribution to meeting housing need for all sections of the community. The London wide Gypsy and Traveller Accommodation Assessment has identified a need for a further 2-11 pitches in the Borough. The shortage and cost of land mean that there will be limited opportunities for gypsy and traveller accommodation in addition to the existing site which will be protected. The Borough will work with partners, RSLs, developers and neighbouring Authorities to seek to meet identified need. Site/s will be allocated as part of the Site Allocations Development Plan Document.

Sites for temporary or permanent use should meet the following criteria:

1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;
2. The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;
3. The use of the site would be acceptable in terms of the visual amenity and;
4. The use could be supported by adequate social infrastructure in the locality.

Justification

The local authority's own site in the Borough has been able to accommodate an increase in capacity in past years, and it is intended to retain this existing provision. A London-wide assessment of supply and demand has been conducted on behalf of all London Boroughs under the auspices of the GLA, and this has identified a need for a further 2 - 11 pitches in the Borough. In terms of supply, it is likely that few opportunities for further provision will arise and great care would be required in finding a location which conformed with other policies and minimised visual intrusion.

¹⁴⁷ http://www.richmond.gov.uk/core_strategy-3.pdf

Development Plan Documents

The Development Management Plan (adopted November 2011)¹⁴⁸ does not mention Gypsy and Traveller sites.

Annual Monitoring Report

The Annual Monitoring Report 2010/2011¹⁴⁹ states that the net additional pitches target was not applicable to the review year.

There is currently one authorised site in the borough at Bishops Grove in Hampton which has 11 pitches, managed by Richmond Housing Partnership (RHP).

The 2011 London Plan states that the Mayor does not consider that it would be appropriate to include detailed policies regarding new provision for gypsies and travellers and travelling show people. In London as in the rest of the country, the impact of provision to meet these needs is essentially local and, as government now proposes nationally, should properly be addressed by local planning authorities in DPDs.

The Council will be considering further work to understand local needs, alongside other innovative solutions to address needs such as providing floating support to those in bricks and mortar to address issues of isolation, managing a home and maintaining a tenancy rather than pitch provision. This is especially important for London boroughs constrained by limited land supply.

Housing Needs Assessment and GTANA

The most recent Local Housing Assessment¹⁵⁰ dates from April 2007 and does not mention Gypsy and Traveller accommodation needs.

Richmond is also covered by the South West London Strategic Housing Market Assessment, which simply states the London GTANA estimated need for additional pitches.

Housing Strategy

The Housing Strategy for 2008-2012¹⁵¹ includes Gypsies and Travellers in the client groups requiring housing support and mentions the duty of local authorities to conduct a local needs assessment that informs their housing strategy.

¹⁴⁸ http://www.richmond.gov.uk/final_development_management_plan_adopted_nov_2011.pdf

¹⁴⁹ http://www.richmond.gov.uk/authority_monitoring_report_2010_2011.pdf

¹⁵⁰ http://www.richmond.gov.uk/fordham_report_final_for_publication_11_may_07.pdf

¹⁵¹ http://www.richmond.gov.uk/housing_strategy_2008-2012_final.pdf

Southwark

South East sub-region

Core Strategy

The adopted *Core Strategy* ¹⁵² [April 2011] protects the four existing sites at Bridale Close, Burnhill Close, Ilderton Road and Springtide Close, providing a total of 38 pitches and sets out criteria for new sites. While there are no clear targets for provision of new sites, the Strategy states that Gypsy and Traveller needs will be addressed in the housing development plan document. Delivery will be monitored in the AMR through a new indicator Amount of new pitches created for Gypsies and Travellers.

Strategic Policy 9 – Homes for Travellers and Gypsies

How we will achieve our vision to improve our places:

SO 2A: Create mixed communities

SO 2C: Provide more and better homes

Our approach is:

We will continue to protect our existing Traveller and Gypsy sites. **We will provide new sites in the future to meet the accommodation needs of Travellers and Gypsies.**

We will do this by:

- Safeguarding the existing four Traveller and Gypsy sites in Southwark.
- Identifying new sites for additional facilities to meet the needs of Travellers and Gypsies having regard to:
 - The need for safe access to the road network.
 - The impact on the local environment and the character
 - The impact on amenity.
 - The availability of essential services, such as water, sewerage and drainage and waste disposal.
 - The proximity to shops, services and community facilities.
 - The need to avoid areas at high risk of flooding.

We are doing this because

Travellers and Gypsies are one of the most socially excluded BME groups in the country. Evidence suggests that there is a link between a lack of good quality Traveller and Gypsy sites and poor health and education. The government, through the Housing Act 2004 and Circular 01/2006 requires all local authorities to assess the accommodation needs of Travellers and Gypsies and to identify sites for their future needs. The criteria set out in this policy will make sure that future sites are suitably located to provide accommodation for Traveller and Gypsies whilst also being in keeping with the surrounding area and neighbouring land uses. We will manage the need for provision of new Traveller and Gypsy pitches in the housing development plan document.

¹⁵² Southwark Core Strategy 2011

http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version

We will protect existing Traveller and Gypsy sites as required by London Plan Policy 3A.14 London's Travellers and gypsies. We currently have 38 authorised Traveller and Gypsy pitches across four sites. The four sites are Bridale Close, Burnhill Close, Ilderton Road and Springtide Close and we have shown these on the proposals map. We will to protect these sites to make sure they remain as homes for Travellers and Gypsies.

Strategic policy 9: Travellers and Gypsies

Strategic Objectives	Targets	Indicators
Objective 2A: Create mixed communities Objective 2C: Provide more and better homes	Safeguarding existing gypsies and traveller sites.	National Indicator: • H4: Net housing pitches (gypsy and traveller) New Annual Monitoring Report Indicators: • Amount of new pitches created for Gypsies and Travellers

Development Plan Documents

The first consultations on the Site Allocations and Development Management DPDs will be in July 2014¹⁵³.

Annual Monitoring Report

The *AMR 2010 - 2011*¹⁵⁴ states that no new sites were built and no existing sites were lost or replaced in the review year. It does not set targets for future provision.

Traveller and Gypsy sites completed in the reporting year	New Traveller and Gypsy homes built	Traveller and Gypsy homes lost or replaced	Gains minus losses	Target range
	0	0	0	N/A

This indicator monitors the supply of Traveller and Gypsy pitches and sites. We currently have 38 authorised Travellers and Gypsies pitches in four sites. The four sites are Bridale Close, Burnhill Close, Ilderton Road and Springtide Close. Through our Core Strategy we have protected these sites and designated them on our proposals map. We have also set out criteria for the allocation of new Traveller and Gypsy sites in the future.

Housing Needs Assessment and GTANA

¹⁵³ *Local Development Scheme June 2011 to December 2015*¹⁵³ [Jun 2011]

http://www.southwark.gov.uk/download/6395/2011-2015_local_development_scheme

¹⁵⁴ AMR 2010 – 2011 http://www.southwark.gov.uk/downloads/download/1860/annual_monitoring_report_amr

Southwark is covered by the *South East London Strategic Housing Market Assessment 2009*, which makes no mention of Gypsy and Traveller needs.

There is no Borough-specific Housing Needs Assessment or GTANA.

Housing Strategy

The *Housing Strategy 2009-2016*¹⁵⁵ [Oct 2009] refers to Gypsy and Traveller needs twice:

To improve housing management we will:

.....

Refurbish existing travellers and gypsy sites; of the four sites, two have been refurbished in recent years, one refurbishment is planned to start in 2009/10. We will seek funding to refurbish the remaining site.

To increase the supply of housing we will:

.....

Continue to protect our existing travellers and gypsy sites. **We will provide new sites in the future to meet the housing needs of travellers and gypsies.**

¹⁵⁵ Housing Strategy 2009-2016 http://www.southwark.gov.uk/downloads/download/1993/housing_strategy

Sutton

South West sub-region

Core Strategy

The Sutton Core Strategy 2009¹⁵⁶ recognises the need to protect the 2 existing Gypsy and Traveller sites (1 private and 1 public) both at Carshalton Road and to provide new sites with criteria as set out. A future Gypsy and Traveller DPD for the Borough will identify preferred sites in conjunction with the Gypsy and Traveller community.

Gypsy and Traveller Sites

6.37 Government Circular 01/2006 defines Gypsies and Travellers as “persons of nomadic habit of life whatever their race or origin, including such persons who on grounds of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such” (Para. 15). The circular also states that “the core strategy should set out criteria for the location of gypsy and traveller sites” (Para. 31) and this is reiterated in the London Plan.

6.38 There are currently two sites within the Borough: one private and one public, both of which are located in the Green Belt, and in the future it will be necessary to make more provision. The London Boroughs’ Gypsy and Traveller Accommodation Needs Assessment (Fordham Research for the GLA, 2008) identified a need for 4-8 residential pitches within the Borough between 2007-2012 and a further 4-5 residential pitches between 2012-2017.

6.39 In accordance with Circular 01/2006 and London Plan Policy 3A.14 and in order to meet the objectives of the Sutton Strategy and Strategic Objectives SO2 and SO3:

Core Policy BP3 – Gypsy and Traveller Sites

The Council will safeguard the continued use of existing sites (as shown on the Proposals Map) and will identify a new site(s) for additional permanent facilities within the Borough to meet the long-term needs of Gypsies and Travellers, having regard to

1. The need for safe access to the road network;
2. The impact on the local environment and the character of the area and safety and amenity considerations;
3. The availability of essential services, such as water, sewerage and drainage and waste disposal;
4. The proximity to shops, services and social and community facilities; and
5. The need to avoid areas at high risk from flooding.

¹⁵⁶ <https://www.sutton.gov.uk/CHttpHandler.ashx?id=17558&p=0>

Implementation of Policy BP3

6.40 The commitment to protect existing sites is a requirement of policy 3A.14 of the London Plan. The criteria for the allocation of new sites have been formulated with regard to advice in Circular 1/2006 and PPS 25 (Development and Flood Risk).

6.41 Further Gypsy and Traveller provision will be sought in order to meet any targets set out in future revisions to the London Plan. Preferred site(s) will be identified by the Council in conjunction with the Gypsy and Traveller community and brought forward through a separate Gypsy and Traveller DPD. It is intended that all pitches will be affordable as they will be owned by the Council and either managed by the Council or a Registered Social Landlord.

6.42 The above criteria will also form the basis of a policy to be included within the Site Development Policies Document that will be used to help determine any planning applications for gypsy sites that may come forward.

Development Plan Documents

The Site Development Policies DPD (2010)¹⁵⁷ sets out, in more detail than the Core Strategy, the criteria for assessing planning applications for new Gypsy and Traveller sites.

Policy DM28-Gypsy and Traveller Site Provision

Background

3.209 There are currently two Gypsy and Traveller sites with the Borough: one private and one public, and they are situated adjacent to each other at Carshalton Road, Woodmansterne. However, the GLA's 'London Boroughs' Gypsy and Traveller Accommodation Needs Assessment' (2008) has identified a need for an additional 4-8 residential pitches within the Borough between 2007-2012 and a further 4-5 residential pitches between 2012-2017. Consequently, there will be a need to consider further Gypsy and Traveller accommodation within the Borough in the near future. The inclusion of a policy in this document is necessary to provide clear guidance for both Gypsies and Travellers (as defined in Circular 1/2006 'Planning For Gypsy and Traveller Caravan Sites') and the other interested parties on how the Council will judge planning applications for additional accommodation. Therefore, in accordance with London Plan Policy 3A.14 (London's Travellers and Gypsies) and Core Policy BP3 (Gypsy and Traveller Sites), the Council will apply the following policy:

Policy DM28 -Gypsy and Traveller Site Provision

Planning permission for further Gypsy and Traveller sites will only be permitted when a site meets an identified need and satisfies the following criteria:

7. The site has safe access to and from the road network, and it has adequate provision for parking, turning, servicing and emergency vehicle access;
8. The site does not have an unduly adverse impact on the local environment, the character of the area and the amenities of both local residents and the future occupiers of the site,

¹⁵⁷ <https://www.sutton.gov.uk/CHttpHandler.ashx?id=12373&p=0>

including the potential for noise, traffic movements and other activities likely to be taking place within or in the vicinity of the site;

9. The site has or will have a supply of essential services, such as mains gas and electricity, water, sewerage and drainage and waste disposal;
- . The site is situated within a reasonable distance of local shops, services and community facilities, in particular schools and health services, and is accessible by public transport;
- . The site is not located in an area at high risk of flooding;
- . The layout of the site, its associated facilities and landscaping will be designed to a high standard including pitches, hardstandings, amenity blocks, parking and turning areas, amenity and play spaces and boundary treatments.

Justification

3.210 The criteria presented in this policy have been formulated with regard to the best practice advice in Annex C of Circular 1/2006 and the Council considers that these are fair, reasonable, equitable and effective. Criteria (a), (b) and (f) will ensure that amenity is preserved for those within and near to any future site. Furthermore, the Council would expect that any future Gypsy and Traveller provision to follow the principles of design laid out in “Designing Gypsy and Traveller Sites: Good Practice Guide” (CLG, 2008). Criteria (c) and (d) will ensure an appropriate standard of living for occupants, while criterion (e) ensures that occupants are not subjected to any unnecessary risk of harm to themselves or of damage to property in the event of flooding.

Annual Monitoring Report

The Annual Monitoring Report for 2009/2010¹⁵⁸ includes a section on Gypsy and Traveller sites under the heading Net Additional Pitches for Gypsies and Travellers. The information presented is, however, only an account of existing pitches and caravans. The document does not assess any progress in the provision of new pitches, neither does it set future targets. The AMR 2010/11 has not been uploaded onto the Council's website and needs to be requested.

Housing Needs Assessment and GTANA

The Sutton Housing Needs Assessment¹⁵⁹ (October 2011) does not mention Gypsy and Traveller needs.

The borough is covered by the South West London SHMA¹⁶⁰ (2009/2010) which only states the GTANA¹⁶¹ (2008) additional pitch requirements.

¹⁵⁸ <https://www.sutton.gov.uk/CHttpHandler.ashx?id=14170&p=0>

¹⁵⁹ <https://www.sutton.gov.uk/CHttpHandler.ashx?id=16883&p=0>

¹⁶⁰ <http://www.swlhp.org.uk/archive/strategies/SHMA%20January%202012.pdf>

¹⁶¹ <http://www.westlondonhousing.org.uk/uploads/London%20GTANA%20final%20report.pdf>

Housing Strategy

The Housing Strategy for 2011/2012¹⁶² reports the GTANA (2008) findings and recognises the need to address Gypsy and Traveller housing needs. Regarding the initiatives undertaken in this direction it states the following:

The Council owns one of two sites for Gypsies and Travellers in the borough, and since last year has begun to manage this in-house. The site, comprising 15 pitches, has benefitted from some recent improvements, and support to the families living there is now being provided by a specialist agency - In Touch.

Other

The Pastures Floating Support Service¹⁶³ is provided through the Supporting People programme funded by the Council to Gypsies and Travellers living on the Pastures traveller site.

¹⁶² <https://www.sutton.gov.uk/CHttpHandler.ashx?id=14230&p=0>

¹⁶³ <http://www.in-touchsupport.co.uk/our-services/31-2/surrey-and-sutton/>

Tower Hamlets

East sub-region

Core Strategy

The Core Strategy (adopted September 2010) covers Gypsy and Traveller accommodation in policy SP02 which protects the existing site at Eleanor Street and sets out criteria for new sites. These will be identified in the Sites and Placemaking DPD. However, since the adoption of the Core Strategy, Crossrail development has required to relocate the site at Eleanor Street in an adjacent location.

Policy SP02

7. Provide for the specialist housing needs of the borough through:

b. Safeguarding the existing Gypsy and Traveller site at Eleanor Street and identifying requirements for new sites through the Site and Place Making DPD, to meet targets set in the London Plan. New sites should meet the following criteria:

i. Those that have been identified as suitable for housing

ii. Have good means of access from roads and be near bus modes

iii. Not be located in areas of high flood risk (Flood Risk Zone 3).

routes a

Development Plan Documents

The Managing Development DPD (submitted May 2012) states that no suitable sites were identified for provision of Gypsy and Traveller sites.

5.5 Core Strategy SP02 safeguards existing Gypsies & Travellers accommodation. The site allocations chapter does not identify new sites for Gypsies and Travellers accommodation following the process stated within the Council's Managing Travellers Accommodation Report (2011). Any proposals for new accommodation will be assessed against the criteria within the Core Strategy SP02 and other policies within the Core Strategy and Managing Development DPD.

Gypsies and Travellers accommodation The adopted Core Strategy (SP02.7b) states that identifying additional sites for Gypsies and Travellers accommodation will be carried out through the Sites and Placemaking DPD. In developing the Managing Development DPD, the criteria stated within the Core Strategy and additional evidence base have been used to try to identify potential sites. A number of sites were initially short-listed and stated within the Sites and Placemaking DPD Engagement Document (2011).

The Site and Placemaking DPD Engagement Document (May 2011) describes the policy framework related to Gypsy and Traveller sites and provides a list of sites that were considered but then discarded as inappropriate.

The adopted Core Strategy (SP02.7b) states that identifying additional sites for Gypsies and Travellers accommodation will be carried out through the Sites and Placemaking DPD. In developing this engagement document, the criteria stated within the Core Strategy and additional evidence base (referred to below and in appendix three) have been used to try to identify potential sites. A number of sites were initially short-listed that met the criteria within the Core Strategy and evidence base:

- Bow Enterprise Park
- Blackwall Reach Regeneration Project
- Bromley-by-Bow Redevelopment
- London Chest Hospital
- Marian Place gas works and The Oval

However, when assessed against Core Strategy SP12 Annex: Delivering Placemaking these sites did not accord with the visions for each of the places and component areas or with emerging development proposals. Therefore we have been unable to identify a potential site for new Gypsies and Travellers accommodation within the borough.

In accordance with Core Strategy SP02(7) the Council will continue to safeguard the existing Gypsy and Traveller site at Eleanor Street.

Annual Monitoring Report

The AMR 2010/2011 does not mention Gypsy and Traveller provision.

Housing Needs Assessment and GTANA

The Tower Hamlets Strategic Housing Market and Needs Assessment (2009)¹⁶⁴ mentions the GTANA maximum need for additional pitches (33 by 2012 and 40 by 2017).

¹⁶⁴ http://www.towerhamlets.gov.uk/lgsi/851-900/868_housing_strategy_and_polic/strategic_housing_market_asses.aspx

Housing Strategy

The Tower Hamlets Housing Strategy 2009-2012¹⁶⁵ states that the Gypsy and Traveller site at Eleanor Street needs to be relocated in order to accommodate the Crossrail project. It also mentions that the Council will produce a strategy for providing the additional Gypsy and Traveller sites that would meet the need identified in the pan London Accommodation Assessment, London Housing Strategy and Regional Spatial Strategy.

Gypsy and Travellers ► **The Council will work with the Nominated Undertaker for the Crossrail Act, other agencies and stakeholder groups to ensure the Eleanor Street Travellers' Site is relocated in accordance with best practice design standards.**

Tower Hamlets has one official council Gypsy and Travellers Site located at Eleanor Street providing 19 pitches. The Crossrail project has given rise to the need to relocate the site to an area of land immediately adjacent its current location. The Eleanor St site has a number of overcrowded pitches, not unique in London. The Council carried out an initial local needs assessment in 2006, as supporting evidence for the petition to the Crossrail House of Commons Select Committee. The assessment indicated that additional provision would need to be planned in this particular instance following the site relocation exercise. The Council has successfully negotiated an undertaking within the statutory framework of the Crossrail Bill to ensure that the site at Eleanor Street is relocated in line with relevant provisions of site design guidance produced by Government. Opportunities will be sought to provide an enhanced level of improvement in the new site design to meet best practice standards. The site will be designed to maximise the potential use of land adjacent to the site that will be returned to the Council when the Crossrail construction is complete in 2017.

► **The Council will produce an over-arching strategy that will set out the Borough's approach to Gypsy and Traveller issues which include the development of suitable proposals for the provision of additional site accommodation based on information set out in the pan London Accommodation Assessment, London Housing Strategy and Regional Spatial Strategy.**

A programme of work will be undertaken to develop and implement proposals to meet the needs identified in the pan London Accommodation Assessment and targets established by the regional housing and spatial strategy process. The legal requirement on Tower Hamlets to address Gypsy and Traveller housing needs is unambiguous. There are three papers that requires the Council to act. There is the Housing Act 2004, requiring Local Authorities to assess the need; the Planning Circular 01/2006 introduces a requirement for every Local Authority to proactively identify land to meet the identified need and Planning Policy Statement 3: Housing requires local authorities to consider the needs as a part of a Strategic Housing Market Assessment. The findings from the pan-London assessment report were considered in the Mayor's London's Housing Strategy. The Mayor's Strategy encourages boroughs to protect existing Gypsy and Traveller pitches, refurbish existing sites where needed, and address the identified requirements for the provision of new sites. The Council will practice conformity and will need to review

¹⁶⁵ http://www.towerhamlets.gov.uk/lgsi/851-900/868_housing_strategy_and_polic.aspx

site provision and quality (as will all other boroughs) on implementation of the Mayor's Strategy.

Other

The *LBTH Gypsy and Travellers Criteria for Additional Sites* report (August 2009)¹⁶⁶ defines the criteria used in the Core Strategy based on DCLG guidance, consultation with the Gypsy and Traveller community and design work undertaken by Crossrail at the existing site.

The *LDF Evidence Base Report: Managing Travellers' Accommodation* (December 2011)¹⁶⁷ describes the site at Eleanor Street, presents the GTANA requirements for additional pitches by 2017 and explains why a new site has not been allocated through the Space and Placemaking and Development Management DPDs. It includes the possibility that Gypsy and Traveller accommodation could be managed through neighbourhood development plans.

The Council website page dedicated to Authorized travellers' sites¹⁶⁸ states that the waiting list for the site at Eleanor Street is closed during 2012/2013 due to the relocation of the site caused by the Crossrail development.

¹⁶⁶ http://www.towerhamlets.gov.uk/lgsi/851-900/856_local_development_framework/evidence_base.aspx

¹⁶⁷ http://www.towerhamlets.gov.uk/lgsi/851-900/856_local_development_framework/evidence_base.aspx

¹⁶⁸ http://www.towerhamlets.gov.uk/lgsi/651-700/655_authorized_travellers_sit.aspx

Waltham Forest

East sub-region

Core Strategy

The adopted *Core Strategy*¹⁶⁹ [Mar 2012] refers to Gypsy and Traveller needs as follows:

Policy CS2 - Improving Housing Quality and Choice

Strategic Objective 2

Ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community, whilst offering a range of housing choices which are of high quality in the right places.

Policy CS2 - Improving Housing Quality and Choice

Housing Growth

The Council will facilitate sustainable housing growth by:

- A) Maximising the number of quality homes in the borough by:
 - i. Resisting the unjustified net loss of residential accommodation

....

Gypsies and Travellers Provision

- F) Creating an inclusive community by seeking to protect existing provision and consider the future needs and requirements of Gypsies and Travellers.

Gypsies and Travellers Provision

5.38 In accordance with Government Circular 01/2006 – Planning for Gypsies and Traveller sites (2006) the Council will identify land to provide for the accommodation needs of Gypsy and Travellers. There is currently one Gypsy and Travellers site in the Borough, which has 17 pitches and the capacity for up to 34 caravans. The Council will continue to protect this site and refurbish where necessary.

In order to meet the need identified in the London Gypsy and Traveller Accommodation Needs Assessment (GTANA) (2008), **the Council will aim to provide a minimum of 3 pitches up to 2017**. Additional need beyond this period will be considered.

¹⁶⁹ Waltham Forest Core Strategy Submission Documents (2011)
<http://www.walthamforest.gov.uk/core-strategy-final-interim-documentv2-lr.pdf>

Potential new sites will be identified in the Site Specific Allocation Document and or Area Action Plan. New sites should

- a) be suitable for housing
- b) have access from the public highway, adequate parking provision and turning
- c) provide basic amenities, water and sewage
- d) not cause harm to/or the loss of designated Metropolitan Open Land, Green Belt and Sites of Nature Conservation Importance
- e) limit the harm to visual amenity
- f) be well integrated with surrounding communities and
- g) not be located on flood zones 3.

The Council will work in close partnership with developers, Registered Social Landlords and neighbouring local authorities in order to meet identified additional need. Any proposals for additional provision will involve extensive community consultation.

Development Plan Documents

The *Site Specific Allocations (Preferred Approach) Consultation Draft* is due to be published during 2012.

The *Development Management Policies Submission Version* ¹⁷⁰ [July 2012] states:

10.1 In accordance with Core Strategy policy CS2, the Council will continue to consider the future needs and requirements of Gypsies and Travellers. The Council will support different communities to be free to lead their lives in different ways. The London Plan (2011) considers that boroughs are best placed to assess the needs of and make provision for gypsies and travellers.

Policy DM 9

Gypsy and Travellers Provision

A) The Council will meet the needs of Gypsies and Travellers in the borough by protecting the existing sites at Folly Lane and Hale Banks North; and

B) Where further sites are proposed the Council will ensure that they:

- Are required to meet additional borough need;
- Do not have any relevant policy designations that restrict the use of the site such as Site of Special Scientific Interest, Metropolitan Open Land, Green Belt, Park, Playing field, Principle Site of Nature Conservation Importance, Site of Local Nature Conservation Importance, Local Nature Reserve and Allotment;

¹⁷⁰ <http://www.walthamforest.gov.uk/Documents/local-plan-develop-mgt-policies-prop-sub-jul12.pdf>

- Are suitable for housing;
- Are able to provide basic amenities, water, sewerage;
- Have suitable access for the type of vehicles that can reasonably be expected to use the site;
- Are accessible from the public highway and adequate provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;
- Are laid out, designed and do not harm visual amenity and that adequate planting and landscaping is incorporated;
- Are well integrated with surrounding communities, particularly in relation to education and health care;
- Are appropriate to its local context and in relation to the local infrastructure and population size and density; and
- Are not in an area at high risk of flooding.

There are currently two Gypsies and Traveller sites in the borough. The largest is located at Folly Lane, South Chingford and provides thirteen residential pitches with a capacity for twenty six caravans of which twenty two are social rented. The other site is located at Hale Brinks North, Highams Park and provides space for four residential pitches and two touring caravans. The Council will continue to protect these sites for use as Gypsies and Travellers sites.

In accordance with Government guidance, the Council should set out criteria by which additional Gypsies and Travellers sites should be assessed. In accordance with Government guidance, the Council will seek to ensure that additional traveller sites are sustainable economically, socially and environmentally. The Council considers that the criteria set out in the policy provides clear design principles for site context and layout, ensures an appropriate standard of living for occupants and ensures that the amenity of existing residents is preserved for those within or near to any future sites. When considering additional sites the Council will take into consideration the existing supply of pitches, the level of occupancy and the level of provision in the wider sub region.

Implementation

Government guidance places emphasis on collaborative working between local authorities to assess the need of travellers and identifying a supply of deliverable sites. The Council will work in close partnership with neighbouring local authorities in order to meet identified additional need. Any proposals for additional provision will involve extensive consultation.

Annual Monitoring Report

The AMR 2010-2011¹⁷¹ states that no pitches were lost or built in the review year. It does not set a target for future provision.

H4: Net additional pitches (Gypsy and Traveller)	
Type	CLG Core Indicator
Purpose	To show the number of Gypsy and Traveller pitches delivered.
Target	No Specific Target
Relevant UDP policy	Policy 3A.14 in the London Plan 2008
2010/011 Findings	There was no gain/loss of pitches in 10/11 ¹⁷² .
Assessment	Policies/objectives being met
Analysis - Waltham Forest only has one Gypsy and Traveller site with 17 pitches for 34 caravans since 2000. There was no gain/loss of pitches in 09/10. As a snap shot in Jul 2009, 14 caravans are socially rented on the site. There are no more updates available on the CLG website since 2009. The Borough has no unauthorized site.	

5.3 The Planning Inspector issued the report on 1 Dec 2011 to recommend that the submitted Waltham Forest Core Strategy is sound and should be adopted subject to the following changes: Revised policies concerning public houses, the night time economy, tall buildings, affordable housing, flood risk, transport and heritage planning; inclusion of policies on minerals, **gypsies and travellers**, energy saving, residential amenity, noise and air pollution.

Housing Needs Assessment and GTANA

The Housing Needs and Market Survey (2007)¹⁷³ simply reports the draft findings of the London GTANA.

Waltham Forest is covered by the *South East London Strategic Housing Market Assessment 2009*, which makes no mention of Gypsy and Traveller needs.

There is no Borough-specific GTANA

Housing Strategy

The *Waltham Forest Housing Strategy 2008-2028*¹⁷⁴ [Jun 2009] mentions that the current provision consists of two Gypsy and Traveller sites.

¹⁷¹ Waltham Forest AMR (2010-2011) <http://www.walthamforest.gov.uk/final-amr-10-11-version30dec11.pdf>

¹⁷² This is added from the table on p8 of the AMR

¹⁷³ Waltham Forest Housing Needs Assessment (2007) <http://www.walthamforest.gov.uk/ke47-walthamforest-housing-needs-market-survey.pdf>

¹⁷⁴ Waltham Forest Housing Strategy (2008) <http://www.walthamforest.gov.uk/housing-strategy-2008-2028.pdf>

There are currently two Gypsy and Traveller sites in the borough, accommodating a largely settled community.

There is no further mention of gypsies or travellers other than a target at the end of the document:

Commitment	Actions and Milestones	Lead officer agency	Deadline for completion
(none)	6. Identify one extra site for Gypsy and Travellers in the borough.	Robin Tuddenham Assistant Director Safer and Stronger Communities	(none)

Wandsworth

South-West sub-region

Core Strategy

Wandsworth's Core Strategy¹⁷⁵ (2010) addresses Gypsy and Traveller issues in Policy IS5, which protects the existing site at Trewint Street and sets out criteria for new sites. There is also a consideration to reduce the capacity of the site from 12 to 10 pitches, as they are below the size recommended by governmental guidance.¹⁷⁶

The Core Strategy mentions the London GTANA (2008) requirements for additional pitches and states that new sites will be identified in a future Site Specific Allocations Document in conjunction with the Gypsy and Traveller community. Demand for additional sites will be monitored through the borough's Annual Monitoring Reports and London Plan reviews.

Policy IS5

The existing Gypsy and Traveller site at Trewint Street will be protected. The Council will identify a new site(s) for additional permanent facilities within the borough to meet the long-term needs of Gypsies and Travellers in the Site Specific Allocations Document, having regard to:

- i. The need for safe access to the road network
- ii. The impact on the local environment and the character of the area and safety and amenity considerations
- iii. The availability of essential services, such as water, sewerage and drainage and waste disposal
- iv. The proximity to shops, services and social and community facilities
- v. The need to avoid areas at high risk from flooding
- vi. Proximity to existing Gypsy and Traveller site.

¹⁷⁵http://www.wandsworth.gov.uk/downloads/file/3674/core_strategy_adopted_version_october_2010http://www.wandsworth.gov.uk/downloads/file/3674/core_strategy_adopted_version_october_2010

¹⁷⁶ <http://ww3.wandsworth.gov.uk/moderngov/mgConvert2PDF.aspx?ID=9760>

The Council has a long-established Gypsy and Traveller site at Trewint Street currently with 12 residential pitches. Capacity will be reduced to 10 pitches to meet new standards. The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (Fordham Research for the GLA, 2008) identified a need for 1-7 additional pitches within the borough between 2007-2012 and a further 2-3 pitches between 2012-2017. A 3% annual increase in demand, as identified in Government advice would give rise to a need for a further 3-4 pitches by 2021/22. The Council will continue to protect the existing Gypsy and Traveller site. A site(s) to meet future need in the plan period will be identified and protected in the Site Specific Allocations Document (SSAD) in conjunction with the Gypsy and Traveller community. The location of the site(s) will be subject to public consultation as part of the preparation of the SSAD. The demand for and provision of additional pitches will be reviewed through the annual monitoring report process and through any relevant London Plan review. It is intended that the new site(s) will be implemented in order to meet future demand.

Development Plan Documents

The Site Specific Allocations Document¹⁷⁷ (2012) ensures the safeguarding of the Gypsy and Traveller site at Trewint Street without reducing the number of pitches.

As justified in Appendix 1, the proposed allocation of the Garratt Mills site at Trewint Street for additional pitches was removed from the adopted SSAD in order to conform with the 2011 London Plan, after the removal of targets for Gypsy and Traveller provision.

Proposals Map reference number: 97.

Site Area: 0.23 ha.

Ward: Earlsfield.

Description: The site is adjacent to the River Wandle and a railway track, and is accessed from Trewint Street off Garratt lane.

Current use: A Council managed and safeguarded Gypsy and Traveller Site.

Policy Context: The site is a long established 12 pitch caravan site serving the needs of Gypsies and Travellers. Core Strategy Policy IS5 identifies that the site will be safeguarded in the SSAD.

Site Allocation: Retain protection as designated Gypsy and Traveller site.

Historic Environment: The site is partially located within an archaeological priority area (refer DMPD Policy DMS2).

Justification: It is a requirement of local authorities to ensure that the accommodation requirements of gypsies and travellers are addressed in line with the London Plan and national policy.

¹⁷⁷http://www.wandsworth.gov.uk/downloads/file/5940/site_specific_allocations_document_ssad_adopted_version_february_2012

Flood Risk: The site is located in Flood Zone 3a and partially located within 3b.

PTAL rating: The site lies within level 4.

Hazard Zones: The site is crossed by National Grid's high voltage underground cables. Guidance in relation to working safely near existing underground cables is contained within the Health and Safety Executive's guidance HS(G)47 "Avoiding Danger from Underground Service".

Infrastructure: If the site is redeveloped/reconfigured, a riverside walk incorporating provision for cyclists will be required in accordance with DMPD Policy DMT3. The detailed mechanisms for requiring contributions will be set out in a forthcoming Planning Obligations SPD/CIL charging schedule.

Appendix 1 Gypsy and Traveller provision

The preferred options version of the Site Specific Allocations Document proposed to allocate the Garratt Mills site at Trewint Street, for an additional Gypsy and Traveller site to meet need for additional pitches identified in the London Plan. The Mayor has indicated in a statement for the Draft Replacement London Plan (DRLP) that he proposes to replace policies on Gypsy and Traveller provision and associated targets with a different policy approach to enable boroughs to address their requirements most effectively in light of local circumstances.

The Core Strategy contains a commitment to review the Borough's housing target and affordable housing target in light of changes to housing figures in the London Plan. The allocation of the Garratt Mills site for Gypsy and Traveller provision has been removed and the borough's allocation of Gypsy and Traveller site(s) will be reviewed through the Core Strategy review of overall housing requirements, to align with any changes in the published London Plan. Further work will be undertaken at that time to review need and to justify any site allocation.

Annual Monitoring Report

The 2010/2011 Annual Monitoring Report¹⁷⁸ states that the 2007-2017 target for 10 additional Gypsy and Traveller pitches is not being achieved. Future targets will be reviewed after the adoption of the 2011 London Plan.

Housing Needs Assessment and GTANA

The Wandsworth Housing Market Assessment¹⁷⁹ (2008) mentions the London GTANA (2008) estimated need for 1-7 additional pitches by 2012. It does not consider these figures as targets for local provision, but suggests a sub-regional approach to accommodate the need for new pitches. Gypsies and Travellers seeking brick and mortar housing are included in the wider social housing need assessment, but it is recognised that they may require additional support.

The 2009 update to the Housing Market Assessment¹⁸⁰ does not mention Gypsy and Traveller issues.

Wandsworth is also covered by the South West London Strategic Housing Market Assessment¹⁸¹ (2009/2010), which mentions the GTANA maximum additional pitch requirements.

Housing Strategy

The Wandsworth Housing Strategy¹⁸² (2003) does not mention Gypsy and Traveller issues.

¹⁷⁸http://www.wandsworth.gov.uk/downloads/download/157/annual_monitoring_reports

¹⁷⁹http://www.wandsworth.gov.uk/downloads/file/1840/wandsworth_housing_market_assessment

¹⁸⁰http://www.wandsworth.gov.uk/downloads/file/2094/housing_market_assessment_2009_update_july_2009

¹⁸¹ <http://www.swlhp.org.uk/archive/strategies/SHMA%20January%202012.pdf>

¹⁸² http://www.wandsworth.gov.uk/downloads/file/1076/housing_strategy_2003

Westminster

North sub-region

Core Strategy

Westminster's *Core Strategy*¹⁸³ [Jan 2011] discusses Gypsy and Traveller accommodation insofar as it says that it simply doesn't have room to develop any pitches.

GYPSIES AND TRAVELLERS

4.18 Due to the built up nature of Westminster, the scarcity of land, and the lack of industrial land, there are currently no suitable sites for Gypsies and Travellers. The requirement for the provision of Gypsy and Travellers' pitches is set out at a regional level, and there is no local need for pitches to be provided within Westminster. It is very unlikely that there will be any suitable sites available in the future. This is because there is no vacant land in Westminster. Housing sites are already developed sites. The 6-15 year list of developable housing sites does not include any vacant land. In addition, because of its central location, housing land in Westminster is developed to high densities so some very small sites can provide large numbers of new homes. Therefore, although Westminster has substantial housing capacity (680 units per annum); it does not have substantial amounts of land. Of the 96 sites identified in the 5 – 15 year land supply assessment, only 27 are over 0.3 ha and of these 21 have valid planning permissions for residential/mixed use. Of the other six sites, one is likely to be developed for hospital and staff and student accommodation; two are in the West End area, and already have buildings on them, and are not appropriate sites; one is a council housing site to be redeveloped to a higher density; and the remaining two sites are currently in social and community use.

POLICY CS17 GYPSIES AND TRAVELLERS

Permission for Gypsy and Traveller sites may be granted subject to the impact on residential amenity, townscape, traffic and parking.

Reasoned Justification

No sites have been allocated for Gypsy and Traveller pitches, reflecting the densely built up nature of the city and scarcity of vacant land. Temporary sites may become available as part of the redevelopment process. The policy provides the criteria for assessing any proposals for pitches. The protection of residential amenity and townscape is vitally important in Westminster due to its dense historic urban fabric with its extensive heritage designations. Criteria are required to ensure that these are not compromised.

Development Plan Documents

Westminster has not produced any Development Plan Documents so far.

183 http://transact.westminster.gov.uk/docstores/publications_store/Core_Strategy_Adopted_26_Jan_2011.pdf

Annual Monitoring Report

The most recent AMR available for Westminster, from 2009-10¹⁸⁴, states the following about gypsy and travellers:

Gypsy and Traveller Provision

Westminster was shown to have zero need in the Gypsy and Traveller Accommodation Assessment (GTAA) and to have no suitable sites for pitches. The Gypsy and Traveller Accommodation Assessment states that Westminster has no need for pitches for gypsies and travellers. Westminster, as a built up central area, does not have any suitable sites for such pitches. The council received no planning applications for sites for gypsies and travellers in 2009-10.

Housing Needs Assessment and GTANA

Westminster is covered by the *Strategic Housing Market Assessment for North London 2009/10* [Feb 2011] which reports the overall sub-regional need for pitches given in the London GTANA [2008] with the proviso “these figures are only draft and are being actively challenged”. There are no targets.

There is no Borough-specific GTANA.

The Westminster housing needs assessment¹⁸⁵ is dated July of 2007 and makes no reference to gypsies or travellers.

Housing Strategy

The Westminster housing strategy¹⁸⁶ is dated March 2010 and makes no reference to Gypsy and Traveller needs.

184 http://www3.westminster.gov.uk/docstores/publications_store/AMR_2009-2010_Final.pdf

185 http://transact.westminster.gov.uk/docstores/publications_store/Westminster%20Housing%20Needs%20Assessment%20Final%20Report.pdf

186 http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf

4. Sub Regional Studies

East sub-region

Opinion Research Services carried out the *Strategic Market Housing Assessment for East London 2009-10*¹⁸⁷ [Sept 2010] covering the following Boroughs:

Barking and Dagenham
City of London Corporation
Hackney (also in North)
Havering
Newham
Redbridge
Tower Hamlets
Waltham Forest

The report includes the following statement on Gypsy and Traveller needs

The Housing Requirements of Gypsies and Travellers

- 7.52 It is widely recognised that there has been an under-provision of adequate accommodation for gypsies and travellers in London and other regions and that this has contributed to very poor health, educational and economic outcomes for these communities.
- 7.53 The London Plan states that Boroughs should assess the accommodation needs of gypsies and travellers, protect existing sites, set out criteria for identifying the suitability of new sites and identify locations for new sites where shortfalls are identified. Similarly, the Housing Act 2004 requires local authorities to assess the accommodation needs of Gypsies and Travellers and to have a strategy in place which sets out how any identified needs will be met as part of their wider housing strategies.
- 7.54 National planning policy (Circular 01/2006) requires regional planning bodies (in London, the Mayor) to specify targets for provision in the form of pitch numbers for each local authority, taking into account the Gypsy and Traveller Accommodation Needs Assessments (GTANAs) carried out in the region and any other relevant evidence.
- 7.55 The 33 London Boroughs in co-operation with the GLA have undertaken and published a London-wide GTANA. Using this as a basis along with a strategic view of needs across the region, as required by Circulars 1/2006 and 4/2007, the Mayor has identified the

¹⁸⁷ For the 3 reports that make up the assessment, see <http://www.lbbd.gov.uk/elhp/policy.html>

number of pitches required for each Borough. It identified a need for a provision of 143 pitches across East London, including 42 in Havering, 28 in Tower Hamlets, and 19 in Hackney from 2007-2017 which are the highest figures in the sub-region. 72% of the need identified by the GTAA comes from Gypsies and Travellers who already live in Bricks and Mortar accommodation but as these needs should have been picked up as part of the assessment of overall housing requirements in this study¹⁸⁸, they are not considered as additional to the requirements identified here.

No attempt is made to look at the issue at Borough level.

North sub-region

Opinion Research Services carried out the *Strategic Market Housing Assessment for North London*¹⁸⁹ [Feb 2011] covering the following Boroughs:

Barnet
Camden
Enfield
Hackney (also in East)
Haringey
Islington
Westminster

The report includes the following statement on Gypsy and Traveller needs:

The Housing Requirements of Gypsies and Travellers

7.66 It is widely recognised that there has been an under-provision of adequate accommodation for Gypsies and Travellers in North London and other regions and that this has contributed to very poor health and educational and economic outcomes for these communities.

7.67 The London Plan states that boroughs should assess the accommodation needs of gypsies and travellers, protect existing sites, set out criteria for identifying the suitability of new sites, and identify locations for new sites where shortfalls are identified. Similarly, the Housing Act 2004 requires local authorities to assess the accommodation needs of Gypsies and Travellers, and to have a strategy in place which sets out how any identified needs will be met as part of their wider housing strategies.

¹⁸⁸ This logic is wrong since the SHMA asked no-one about their need for pitches.

¹⁸⁹ See, for example, http://www.haringey.gov.uk/north_london_shma_main_report_2011_red-v1.pdf

- 7.68 National Planning Policy (Circular 01/2006) requires regional planning bodies (in London, the Mayor) to specify targets for provision in the form of pitch numbers for each local authority, taking into account the Gypsy and Traveller Accommodation Needs Assessments (GTANAs) carried out in the region and any other relevant evidence.
- 7.69 Thirty two London boroughs in co-operation with the GLA have undertaken and published a London-wide GTANA (analysis for Bexley was produced using secondary data). For the period 2007-2017 the report identifies a minimum need across North London of 7 residential pitches and a maximum need (including those in bricks and mortar with a psychological aversion) of 66 pitches, noting that this is for both existing and newly arising need. Within the draft replacement London plan, using this as a basis along with a strategic view of needs across the region, as required by Circulars 1/2006 and 4/2007, the Mayor identified the number of pitches required for each borough. However, these figures are only draft and are being actively challenged. Therefore, the figures taken directly from the GTANA are presented here.
- 7.70 The GTANA also estimated a need for 7 plots for Travelling Showpeople located in North London. A requirement of 40 transit pitches across London, not apportioned by area, was also identified in the GTANA.

South West sub-region

Croydon
Kingston upon Thames
Lambeth
Merton
Richmond upon Thames
Sutton
Wandsworth

The South West Housing Partnership produced a Housing Strategy in 2004 which does not mention Gypsy and Traveller needs.

The South West housing partnership produced the *South West London Strategic Housing Market Assessment*¹⁹⁰ [Jan 2012] which reads as follows.

8.6 Gypsies and Travellers

The government undertakes a count of gypsy and traveller caravans every six months. This covers authorised and unauthorised local authority and private sites, categorising the unauthorised sites as being either "tolerated" or "not tolerated". The most recent count (July 2009) covered 809 caravans in London. Within the south west London sub-region there were 142 gypsy caravans, all but 2 on authorised sites. The largest number of caravans

¹⁹⁰ <http://www.swlhp.org.uk/archive/strategies/SHMA%20January%202012.pdf>

found was 38 (including 9 on a private site) in Sutton, whilst Wandsworth had the smallest number (11) amongst the authorities in the sub-region.

The Consultation Draft of the Replacement London Plan contains assessments, on a borough by borough basis, of the need for Gypsy and Traveller Pitches for the period 2007 – 2017. These allocations were based on a Gypsy and Traveller Accommodation Assessment carried out by the London boroughs. Some amended figures were included in draft Minor Amendments issued in March 2010. The information for south west London is:

Table 8.4 Gypsy and Traveller pitches requirement by borough 2007 - 2017

Borough	Pitches
Croydon	22
Kingston	25
Lambeth	10
Merton	9
Richmond	4
Sutton	10
Wandsworth	10
SW London	95

A separate issue is the needs of gypsy and traveller households who are not living in caravans and have taken up occupancy of a "bricks and mortar" property. There is no accurate estimate of the number of such households in the sub-region. There is, however, a growing appreciation of the issues that arise for such households. The Gypsy and Traveller Accommodation Assessment in London previously referred to estimated that 77% of the demand for pitches came from households living in "bricks and mortar" homes.

South East sub-region

Bexley
Bromley
Greenwich
Lewisham
Southwark

There is no mention of Gypsy and Traveller needs in any of the reports of the *South East London Strategic Housing Market Assessment 2009*¹⁹¹ [Jan-May 2010]

The *Strategy of the South East London Housing Partnership 2010-14*¹⁹² [Aug 2010?] states

Gypsies and Travellers

Through the draft replacement London Plan (DRLP), the Mayor of London has proposed targets for additional pitches for Gypsies and Travellers across London for 2007-17. The original target for SE London, established following a GLA Gypsy and Traveller Accommodation Needs Assessment in 2008, was 147 pitches across the five boroughs. This took into account the needs of those already living in bricks and mortar accommodation and those with a “psychological aversion” to doing so.

At the time of writing, the Mayor is consulting on a minor alteration to the consultation DRLP, to exclude provision for those already living in, but with a psychological aversion to bricks and mortar. The proposed new target for the sub-region is 56 additional pitches (with an additional 15 transitional pitches and 53 plots for travelling show people to be distributed across London via sub-regions). SELHP has produced good practice guidance on the development of Gypsy and Traveller sites.

The good practice guidance referred to here is *Developing minimum standards for permanent gypsy and traveller sites in South East London*¹⁹³ [Feb 2006]

¹⁹¹ SE :London SHMA <http://www.selondonhousing.org/Category.asp?id=SX100F-A77F4867>

¹⁹² The Strategy
http://www.selondonhousing.org/Documents/SELHP%20Strategy%20Doc_fin2.pdf

¹⁹³ Developing minimum standards....
<http://www.selondonhousing.org/Documents/Final%20report%20to%20SE%20London%20Housing%20Partnership%20v05%207-2-06.pdf>

West sub-region

Brent
Ealing
Hammersmith and Fulham
Harrow
Hillingdon
Hounslow
Kensington and Chelsea

The *West London Strategic Housing Market Assessment 2010 - Report of Study Findings*¹⁹⁴ [Nov 2010] reads as follows.

Housing Requirements of Gypsies and Travellers

- 7.66 It is widely recognised that there has been an under-provision of adequate accommodation for gypsies and travellers in London and other regions, and that this has contributed to very poor health and educational and economic outcomes for these communities.
- 7.67 The London Plan states that Boroughs should assess the accommodation needs of gypsies and travellers, protect existing sites, set out criteria for identifying the suitability of new sites and identify locations for new sites where shortfalls are identified. Similarly, the Housing Act 2004 requires local authorities to assess the accommodation needs of Gypsies and Travellers and to have a strategy in place which sets out how any identified needs will be met as part of their wider housing strategies.
- 7.68 National Planning Policy (Circular 01/2006) requires regional planning bodies (in London, the Mayor) to specify targets for provision in the form of pitch numbers for each local authority, taking into account the Gypsy and Traveller Accommodation Needs Assessments (GTANAs) carried out in the region and any other relevant evidence.
- 7.69 The 33 London Boroughs in co-operation with the GLA have undertaken and published a London wide GTANA. Using this as a basis along with a strategic view of needs across the region, as required by Circulars 1/2006 and 4/2007, the Mayor in the Draft Replacement London Plan, identified the number of pitches required for each Borough. The draft plan has since been altered and reflects a lower target. It should be noted that these figures are still under review and may change again following the Examination in Public in December 2010. Policy 3.9 has been re-drafted and the targets and rationale for them can be contained in the minor alterations to the plan document published in March 2010. The document can be viewed at

194

<http://www.westlondonhousing.org.uk/uploads/2011%2001%2024%20West%20London%20SHMA%20Report.pdf>

<http://www.london.gov.uk/shaping-london/london-plan/docs/gt-alt-mar10.pdf>

7.70 The GTANA also identified a need for 64 houses to be available for Gypsies and Travellers. 72% of the total need identified by the GTAA comes from Gypsies and Travellers who already live in Bricks and Mortar accommodation but as these needs should have been picked up as part of the assessment of overall housing requirements in this study, they are not considered as additional to the requirements identified here.

5. References

DCLG, 2012, National Planning Policy Framework

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

DCLG, 2012, Planning Policy for Traveller Sites

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

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, 2012, London Plan Revised Early Minor Alterations

http://www.london.gov.uk/sites/default/files/LP%20REMA%20June%202012_0.pdf

GLA, 2011, London Plan

<http://www.london.gov.uk/publication/londonplan>

ODPM 2006. Circular 01/2006. *Planning for Gypsy and Traveller Caravan Sites*

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/circulargypsytraveller.pdf>

Traveller Commissioning Strategy 2012

Balancing the needs of Traveller
communities and the City's
settled communities



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Any enquiries regarding this publication should be sent to:

Brighton & Hove City Council, Housing Strategy Team,

2nd Floor Bartholomew House, Bartholomew Square,

Brighton BN1 1JE.

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Acknowledgements

We would like to thank all those who took the time to share their views, opinions and stories with us. These conversations have helped shape our own understanding of the needs of both Traveller communities and local residents and ultimately set the direction and priorities of our strategy.

Copies of our strategies are available from:

e: housing.strategy@brighton-hove.gov.uk

w: www.brighton-hove.gov.uk/housingstrategy

Traveller Commissioning Strategy 2012 **Balancing the needs of Traveller communities and the City's settled communities**

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Turkish

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Foreword

I would like to welcome you to our new Traveller Commissioning Strategy which has been developed in partnership with residents, Traveller groups and service providers.

Travellers have been making a living around the country for hundreds of years. However, as traditional stopping places have been lost, the travelling lifestyle has become increasingly difficult. Nationally, two thirds of Travellers now live in bricks and mortar housing with those actively travelling being a minority within a minority.

As a consequence of the economic challenges facing travelling communities they are increasingly disadvantaged. On average their health is worse and life expectancy lower. Travellers are more likely to be poorly educated, suffer discrimination and experience racial hatred. Limited access to secure and safe stopping places makes it difficult for Travellers to access the services they need.

Evidence tells us that we have a lower proportion of Traveller households in the City than the South East average yet due to the shortage of stopping places for those Travellers visiting Brighton & Hove they are up to 4 times more likely to have to set up unauthorised encampments here than in the rest of the region.

The national shortage of sites causes tensions between Traveller groups and local residents particularly when unauthorised encampments are set up in parks or playing fields. We estimate that nationally, less than 6% of all Travellers are on unauthorised encampments yet myths surrounding Traveller communities, often fuelled by the media and the anti-social behaviour caused by a small minority are inflaming emotions, tensions and mistrust.

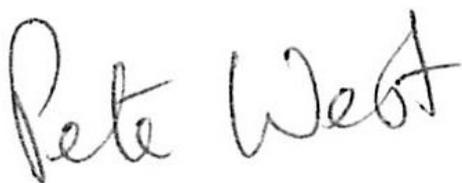
Brighton & Hove prides itself on being a tolerant and welcoming city. We recognise that embracing diversity helps the city to thrive and gives it a vibrancy that other areas find hard to match. However, sometimes tensions arise between communities which if not dealt with undermine our reputation. It is in these circumstances that the council, working with our partners, has a duty to act.

In summer 2011 we tested a part of our new approach. Rather than continuing to push Travellers around the city causing encampments that would impact on many local communities, we allowed one group to stay longer at an out of town location with a lesser impact. As a direct result of this there was a 40% reduction in the number of encampments between July and September when compared to the previous 3 months. We would normally expect to see an increase at this time of year yet there were 25% fewer encampments than during the same time in the previous year.

We also worked with the Police to support Operation Monza during the summer where the Police made daily visits to encampments to improve relations with Travellers and reassure residents. During this period, not a single encampment was moved because of nuisance or anti-social behaviour and our teams saw a marked decrease in resident complaints.

The overall shortage of temporary and permanent stopping places at a national level means that we may always have unauthorised encampments but our strategy aims to limit them in sensitive locations. A national approach is required as is a regional one, but in the absence of a lead from central government we have to fall back on local solutions. We are taking a firm but fair approach in dealing with encampments that respects the nomadic lifestyle and needs of Traveller communities and balances this with the interests of local residents.

I would like to thank all those that have been able to respond to our consultation. It is your views that have helped to shape this strategy and our priorities which will ultimately benefit both our settled and Travelling communities.



Councillor Pete West
Cabinet Member for Environment & Sustainability

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1. Our Strategic Vision and Outcomes

1.1 Our Vision

Travellers are identified as being the most disadvantaged ethnic group in the country, suffering a high level of inequality. Travellers die younger, experience more chronic health conditions, have a poor level of education, and regularly experience discrimination and racial hatred. Lack of suitable, secure accommodation underpins many of these inequalities as access to employment, health, education and other services is made easier when people are living in settled accommodation.

Traveller groups estimate that nationally around 2/3 of Travellers now live in bricks and mortar housing. Of those that still live in caravans, the majority are on official sites which are owned and managed by Travellers themselves, local authorities or registered providers. Nationally, we estimate that less than 6% of all Travellers are on unauthorised encampments.

The Government's Gypsy & Traveller Caravan Count tells us that Brighton & Hove has fewer Travellers in the city than would be expected from a population our size yet a lack of suitable stopping places has resulted in Travellers being up to 4 times more likely to be on an unauthorised site in the City than both the national and regional average. This has inflamed tensions in some communities as Travellers have set up encampments in the city's parks and open spaces.

Our strategy hopes to tackle the fundamental inequalities Travellers face and the issues caused by the shortage of suitable stopping places and has a vision of:

Balancing the needs of Traveller communities and the City's settled communities to reduce inequality and improve community relations

*[The Vision] "Seems a sensible and fair approach to a set of circumstances that cannot be ignored."
(Resident)*

In achieving our vision we will take a firm but fair approach to discourage Travellers from setting up encampments in sensitive locations and aim to reduce the costly and disruptive cycle where Travellers are pushed from site to site.

1.2 The outcomes we want to achieve

To achieve our vision we have identified 4 main outcome areas aimed at supporting Travelling communities to improve the quality of their lives and reduce the tensions between Travellers and the settled population:

Outcome 1: Improve site availability

Outcome 2: Improve health, safety and wellbeing

Outcome 3: Improve education outcomes

Outcome 4: Improve community cohesion

Action to address these priorities will help ensure we have adequate Traveller pitch provision to improve stability for those Travellers living in and visiting the city.

Improving site availability will help Travellers access education and health services more effectively and also reduce pressures on the city's parks and open spaces to tackle anti-social behaviour and improve community cohesion.

Making a Difference

Over the lifetime of this strategy we would like to:

- Reduce the number of unauthorised encampments by making proper provision for well managed stopping places for Travelling communities such as through the provision of a permanent site
- Improve educational attainment within local travelling communities.
- Improve health, safety and wellbeing amongst local Travelling communities
- Improve community cohesion by increasing awareness and understanding between travelling communities and residents of the city
- Reduce the incidence of unauthorised encampments on the city's parks and open spaces
- Tackle domestic and sexual violence, anti-social behaviour and nuisance
- Reducing racism, prejudice and hate crime

1.3 Funding our strategy

Through our strategy we want to ensure we achieve maximum value for money by providing the services that will make the most difference and by reprioritising funding from reactive to preventative services. Whilst it is difficult to quantify some costs as many services are provided to all residents, the dedicated Traveller services the Council provides in managing the Horsdean Transit site, tackling unauthorised encampments and providing outreach education services is around £600,000 per year, equivalent to about £5 of a household's annual Council Tax bill.

Just over half of our costs go on unauthorised encampments, although this cost does not include the more intangible impact on the settled and Travelling communities such as residents not being able to use parks or the impact on the health and education of Traveller from regular evictions. If we had more authorised stopping places then this money could be better used to support the provision of services and help build the bridges between our communities. In addition, those on authorised sites are required to pay rent and contribute to the cost of services and Council Tax.

The new permanent Traveller site that has been proposed is being funded by a Government grant. In addition, each new pitch provided attracts the Government's New Homes Bonus which is a payment equivalent to 6 years average Council Tax.

1.4 A partnership approach

The Traveller Commissioning Strategy has not been developed in isolation but has involved services across the Council and beyond such as:

- **NHS Sussex:** Provides services to the whole community plus has staff specialised in Traveller needs to target key issues around health such as a specialist Health Visitor, Midwife and Health Trainers.

- **Traveller Education Team:** All children deserve a good education. This service is provided on our behalf by East Sussex County Council and helps Traveller children access schools and learning activities.
- **Sussex Police:** Dedicated Traveller Liaison Officers operate across Sussex to help address unauthorised encampments and provide support to Travellers and the settled community to tackle anti-social behaviour.

Local Leadership

Tackling the needs of marginalised groups is not possible without strong local leadership. We understand that politicians and community representatives can face significant challenges when the needs of one group are perceived to impact upon the needs of another. Our strategy aims to support community champions with a clear purpose, effective training and up to date information to help them represent all the communities they serve.

Traveller Scrutiny Panel

The development of our strategy was shadowed by a cross-party Traveller Scrutiny Panel which gathered evidence and made a number of important recommendations that have improved the final strategy and will ultimately benefit Travellers and the settled community. This valuable work has highlighted that a consensus across the whole political spectrum is vital to tackling Traveller inequality and local issues.

Media

Stories in the media during the spring of 2011 highlighted the importance of developing a good relationship with the press as they have a key role to play in building stronger communities. As part of our strategy we want to work with the press to ensure that reporting is balanced and fair to both Travellers and local residents.

Regional Working

The very nature of a travelling lifestyle means that we need a regional approach to tackling Traveller inequality and the shortage of suitable stopping places:

- **Sussex Joint Local Authority Traveller Forum:** This new group has been set up to help share good practice and co-ordinate a regional response to Traveller issues. The group is made up of Sussex Police, Brighton & Hove City Council, East Sussex County Council, West Sussex County Council and a number of district authorities.
- **Gypsy and Traveller Advisory Group:** In recent years, Sussex Police have worked with the Sussex Traveller Action Group and Travellers to address issues of concern.
- **South Downs National Park:** The shortage of stopping places for Travellers results in unauthorised encampments in the National Park as well as in our local communities. Through our strategy we will work with the National Park Authority to protect sensitive sites and minimise unauthorised encampments. We have also agreed a Joint Communications Protocol where we will notify the Park Authority and involve them in key decisions from the moment an encampment occurs within the Park. As the proposed location of the new permanent Traveller site is in the Park boundary it will be the National Park Authority that determines the planning application for the site.

Community and Voluntary Sector Services

The Community and Voluntary Sector plays a vital role in helping service providers build trust with Traveller groups to enable them to provide the services vitally needed.

In addition, Brighton & Hove has a number of Local Action Teams made up of local residents and businesses that work to support all communities to provide information and work with services to resolve problems in their neighbourhoods.

2. Who are our Traveller communities?

2.1 Introduction

The term Travellers is often used to describe groups of people who have a nomadic lifestyle or who come from a tradition or heritage of nomadism.

Romany Gypsies, Irish and Scottish Travellers are recognised in law as ethnic groups and are identified as having a shared culture, language and beliefs. Romany Gypsies have been in England for over 600 years and Irish Travellers have a long history of travelling and living in this country. 'English Travellers' has many meanings and can cover English Gypsies of Roma origin, Irish Travellers born or living in England and New Travellers.

The term 'Travellers' also covers some groups not recognised as ethnic groups including 'New Travellers' who are non-traditional Travellers and Travelling showpeople.

Brighton & Hove is predominantly visited by Irish Travellers and a smaller number of Romany Gypsies and New Travellers. We hope to have more information on Travellers living in the local settled community once the Census 2011 results have been published late in 2012.

A special note on Van Dwellers

Brighton & Hove also has a population locally termed as Van Dwellers. Van Dwellers are usually found living in their vehicles on the roadside or on unauthorised encampments and are generally not nomadic. Van Dwellers are not considered to meet the definition of a Traveller in any national policy as collectively they are not a recognised ethnic group nor are they considered New Travellers as they are effectively permanently resident in the city, such as through work or education.

This distinction between New Travellers and Van Dwellers is hard to make and often not recognised by local people who experience lived-in vehicles parked outside their homes, often for many days, which can further inflame tensions against Travellers. As lived-in vehicles are an issue for the city, the need for a separate protocol for van dwellers will be developed.

Roma Gypsies

The Roma community left India approximately 1,000 years ago and migrated westward arriving in Europe in the 14th century. The first recorded presence of Roma in the UK was over 600 years ago.

Since their arrival in Europe they have consistently endured exclusion and persecution and remain on the fringes of mainstream society. The darkest chapter of Romani history came during the Second World War when the Nazi regime exterminated approximately 500,000 because they were seen as biologically inferior.

The socio-economic and political marginalization of Roma across Europe is more pronounced today than it ever has been as deep seated prejudices and racism conspire to ensure that Roma communities are amongst the poorest and most vulnerable people on the continent.

Gypsies were recognised as a racial group under the Race Relations Act 1976 and continue to be recognised as such under the Equality Act 2010.

Irish, Welsh and Scottish Travellers

Irish Travellers call themselves *Pavee* “the walking people” and are a distinct nomadic ethnic group that has been part of our culture for many centuries. They were commonly known as Tinkers, which came from ‘tinsmith’ from their ancient pre-Gaelic language called Shelta, which some still use today.

Irish Travellers were recognised as a specific racial group under the Race Relations Act 1976 and continue to be recognised as such under the Equality Act 2010.

Scottish Travellers live a similar lifestyle to Irish Travellers and are recognised as a specific racial group in the same category as Irish Travellers. In addition there are many Welsh Travellers.

Recently, employment has shifted to casual forms of building work, gardening and scrap metal collection and has meant that many have migrated to more urban areas of the country.

Travelling Showpeople

Showpeople have traditionally provided the entertainment at fairs across the country for centuries. In the past Showpeople would travel nearly all year and the return to settled 'winter quarter' home sites in the off season. Due to the decline in traditional fairs and the desire to improve the opportunities for their children through access to a stable education they are increasingly living in 'winter quarters' all year round.

The family and extended family groups are important with living in close proximity a key feature in Showpeople's culture. While the Travelling Showpeople community have certain aspects in common with other Traveller communities, they regard their culture as fundamentally different to Gypsies and other Travellers.

Due to the nature of their work, Showpeople have much greater contact with local authorities than other Traveller communities and tend to have comparatively good employment prospects, health, and educational attainment.

Bargees

Bargees are boat dwelling people and are considered occupational travellers who operate barges on canals and inland waterways.

New Travellers

New Travellers are non-traditional Travellers who mostly have originated from the settled community. Their history goes back to the 1960s when a number of young people started to live on the road in an assortment of vehicles.

Their reasons for taking up the nomadic lifestyle vary, from making a positive decision to choose a different way of life to feeling that it was the only option for their situation.

New Travellers are now into a 2nd or 3rd generation but they are not legally recognised as a distinct and separate racial group.

2.2 Estimating the Traveller Population

There is no definitive data for the number of Gypsies and Travellers in the UK. The Commission for Racial Equality¹ estimated that there could be 368,000-488,000 Travellers living in England and Wales (25% in caravans and 75% in conventional housing). Other studies estimate between 200,000 and 300,000 and Traveller groups themselves estimate around 300,000 with 2/3 living in bricks and mortar housing.

The Gypsy & Traveller Caravan Count which is carried out twice a year on behalf of the Government recorded² reported that there were 3,942 caravans in the South East including 60 in the City in January 2011. From this we can estimate the population of Travellers living in those caravans³:

- South East: Around 9,000 Travellers in 2,995 households
- Sussex: Around 976 Travellers in 326 households
- Brighton & Hove: Around 146 Travellers in 46 households

However, locally we know that the Brighton & Hove Caravan Count figure includes a number of Van Dweller households so the actual number of Traveller households living in caravans in the city is likely to be fewer than the estimate given above.

Whilst nationally around 2/3 of Travellers may live in bricks and mortar housing this estimate may not hold true in Brighton & Hove. The East Sussex and Brighton & Hove Traveller Survey 2005 found only a very small proportion of Travellers in bricks and mortar housing in the city compared to the rest of East Sussex. In view of this it would not be appropriate to use the national ratio to estimate the local Traveller population.

¹ Commission for Racial Equality (CRE), "Common Ground: Equality, good race relations and sites for Gypsies and Irish Travellers", 2006, section 1.2. This estimate is attributed to Niner, P, 'The accommodation needs of Gypsy-Travellers in Wales', 2006, Niner, P, 'The Provision and Condition of Local Authority Gypsy and Traveller Sites in England', 2002 and Ivatts, A. 'The Education of Gypsy / Roma Traveller and Travelling Children', 2005

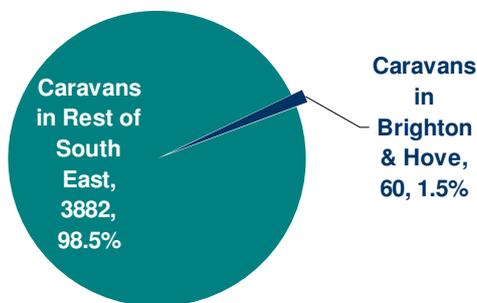
² Estimate at January 2011 from Government's Gypsy & Traveller Caravan Count

³ Assumes 1 household per pitch with 1.32 caravans per pitch calculated from 1,053 known public sector pitches in South East with 1,386 caravans on them in the Jan 2011 Count. Also assumes 3.2 family members per household in East Sussex and Brighton & Hove from 'East Sussex & Brighton & Hove Traveller Survey', David Couttie Associates 2005 and 2.9 family members per households in West Sussex GTAA, David Couttie Associates 2007. South East uses both 2.9 and 3.2 to provide a range

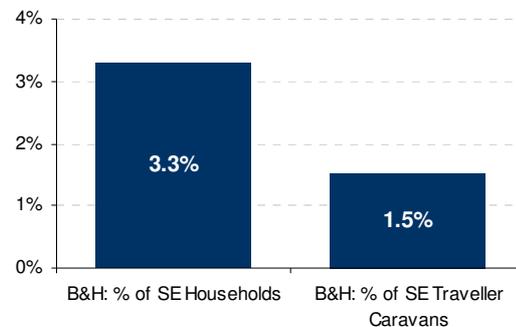
The Census 2011 recorded those who identified themselves as Gypsy & Travellers for the first time. Once the Census results are published towards the end of 2012 we will have a more accurate picture of the size of the local Traveller population.

In addition, our analysis shows that whilst Brighton & Hove's population has 3.3% of all households in the South East it has only 1.5% of the region's Traveller caravans⁴.

Gypsy & Traveller Caravans in the South East
(DCLG Caravan Count - Jan 2011)



Households Comparison
DCLG: South East Caravan Count (January 2011)



2.3 Inequality

Gypsies and Travellers have been identified as being the most disadvantaged ethnic group in the country suffering a high level of inequality.

Their health is far worse than the population as a whole, particularly around life expectancy, infant mortality and maternal mortality. In addition travelling communities suffer from poor education, discrimination and racial hatred.

Lack of suitable, secure accommodation underpins many of the inequalities that they experience as access to employment, health, education and other services is made easier when people are living in settled accommodation.⁵

⁴ We believe these figures include some Van Dwellers so the actual proportion of Travellers would be less than the figures quoted

⁵ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

'Inequalities experienced by Gypsy and Traveller Communities: A Review', Equality & Human Rights Commission, 2009

This EHRC report shows that Gypsy and Traveller communities experience extensive inequalities, such as:

- Gypsies and Travellers die earlier than the rest of the population
- They experience worse health, yet are less likely to receive effective, continuous healthcare
- Children 's educational achievements are worse, and declining still further (contrary to the national trend)
- Participation in secondary education is extremely low, with bullying cited as reasons for leaving education early
- There is a lack of access to pre-school, out-of-school and leisure services for children and young people
- Employment rates are low, and poverty high
- Insecure lifestyles associated with repeated evictions can have a negative psychological impact upon children
- There is an increasing problem of substance abuse among unemployed and disaffected young people
- There are high suicide rates among the communities
- Gypsies and Travellers who live in bricks and mortar housing can experience racist hostility from neighbours and isolation from their communities
- For some particularly excluded groups of young Gypsies and Travellers, there is a process of accelerated criminalisation
- Policy initiatives and political systems that are designed to promote inclusion and equality frequently exclude Gypsies and Travellers
- There is a lack of access to culturally appropriate support services for people in the most vulnerable situations, such as women experiencing domestic violence
- Gypsy and Traveller culture and identity receive little or no recognition, with consequent and considerable damage to their self-esteem

The report highlights that lack of suitable secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience.

2.4 The profile of Traveller inequality

Whilst Travellers experience higher inequality than the rest of the population there are also differences within the communities.

Age

Due to lack of data it is not possible to report an accurate age profile of the Traveller population but it is known that Gypsies and Travellers have larger families, have children at a younger age and have a lower life expectancy with 50 considered old age. This suggests that the Traveller population has a younger profile than the overall population of the UK.⁶

There is a lack of comparative information on children but studies that have taken place have found higher rates of illness among Gypsy and Traveller children as compared with others.⁷ The limited studies undertaken, indicated high infant mortality and perinatal death rates, low birth weight, low immunisation uptake, and high child accident rates, within the Gypsy and Traveller community.

Race

Racism towards Gypsies and Travellers is still common, frequently overt and often seen as justified. The Traveller communities have experienced services being not welcoming or refused; of employment offers being withdrawn; and of people being harassed in or dismissed from employment.

The Equality Act 2010 makes it unlawful for employers and service providers to discriminate against any group on the grounds of race. This includes Gypsies and Travellers who are recognised as ethnic groups. The Act requires us to have *due regard* to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

⁶ 'Health and social care needs of Gypsies and Travellers in West Sussex', Report to NHS West Sussex and West Sussex County Council, Office for Public Management, 2010

⁷ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

The research evidence shows that Gypsies and Travellers have a culturally distinct and identifiable set of beliefs and attitudes which impact on inequality. Cultural beliefs can be a barrier to Gypsies and Travellers accessing services.⁸

Religion or belief

Many Romany Gypsies and Irish Travellers are Christians and members of Christian religious groups. Religion has become for many an important aspect of cultural identity. However, many have experienced difficulty in accessing faith groups because of their ethnic and cultural identity.

Irish Travellers are usually devout Roman Catholics and their children attend Catholic schools. Large numbers of Romany Gypsies are now Born-again Christians and the Gypsy Evangelical Church (also referred to as Gypsy Pentacostalism) has gained numerous followers and influence in the last thirty years.⁹

Disability

In later life Gypsy and Traveller adults suffer higher rates of long-term illness, ill health or disability, limiting their ability to lead a 'normal' life. In addition, those travelling find it hard to access ongoing health and social care services to provide them with the support they need to maintain their independence.

Gypsies and Travellers have been found to be nearly three times more likely to be anxious than others, and just over twice as likely to be depressed, with women twice as likely as men to experience mental health problems. Despite an overall decline in suicide rate in Britain, Traveller communities are over-represented as being at risk.¹⁰

⁸ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

⁹ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

¹⁰ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

Gender

Research¹¹ shows how the family and home is at the centre of Traveller value systems. In general, men are expected to take responsibility for financially supporting the family while women take responsibility for the home and children.

In fulfilling the role of mothers, home-makers and carers, Traveller women frequently bear the brunt of family unemployment, financial exclusion, and often have to care for large families without facilities such as running water and sanitation. Even for women resident in housing, the burden of supporting a family and coping with racism, discrimination and isolation can lead to increased rates of anxiety, depression, mental health problems and sometimes substance abuse.¹²

The role of Traveller women allows for limited access to education or employment with poor access to information about support services. For those families on a stable site, women are adapting to changing circumstances and in some cases are returning to education, training or employment¹³. However, evidence suggests this shift is increasing domestic violence and relationship breakdown.

An expectation that women will marry and have children at an early age results in many girls being withdrawn from school at puberty so they lack the formal education or information that their peers have access to at school, like contraception, healthy relationships, and consensual sex.

Research has highlighted that it is particularly common for Traveller men to be stoical about their health and appear to dismiss minor health complaints as insignificant and do not go to the doctor, or present very late, and prefer to self-medicate rather than seek medical advice.¹⁴

¹¹ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

¹² Power, 2004; Shelter, 2007 (source EHRC review)

¹³ Clark & Greenfields, 2006, findings from Gypsy Traveller Accommodation Assessments

¹⁴ 'Health and social care needs of Gypsies and Travellers in West Sussex', Report to NHS West Sussex and West Sussex County Council, Office for Public Management, 2010

Pregnancy and maternity

Research has highlighted the excess prevalence of miscarriages, stillbirths, neonatal deaths and premature deaths of older offspring. There is evidence that Traveller mothers are 20 times more likely than the rest of the population to have experienced the death of a child and have possibly the highest maternal death rate amongst all ethnic groups.¹⁵

Gender Reassignment and Sexual orientation

Though no research on this has been identified, it is believed and reported anecdotally that Travellers from the Lesbian, Gay, Bisexual and Transgender community face homophobia, hate crime and exclusion from their community.

2.5 Community and Voluntary Sector Services

Friends, Families and Travellers (FFT) is a national organisation based in Brighton that seeks to address the problems facing the Gypsy and Traveller community. FFT not only carries out research and policy development but also provides services to the Traveller community through advice, information and advocacy. FFT has a national helpline (01273 234777) which takes cases from all around the country and local cases are managed by its outreach Team which operates across Sussex (including Brighton & Hove).

A number of groups also provide services and support to Travellers in our area:

- Clearwater Gypsies: www.clearwatergypsies.com
- Sussex Traveller Advisory Group: www.sussextag.org.uk
- Roma Support Group: www.romasupportgroup.org.uk
- The Gypsy Council: www.gypsy-association.com
- Irish Traveller Movement in Britain: www.irishtraveller.org.uk

¹⁵ 'Health and social care needs of Gypsies and Travellers in West Sussex', Report to NHS West Sussex and West Sussex County Council, Office for Public Management, 2010

3. Traveller sites

3.1 Site provision in the South East

The provision of accommodation for Traveller communities, both transit and permanent, in Brighton & Hove can not be viewed in isolation but needs to be considered alongside provision across the region.

In recognition of the cross-border nature of Gypsy and Traveller issues we have recently set up the Sussex Joint Local Authority Traveller Forum in partnership with neighbouring authorities and Sussex Police. This forum will help us share good practice and improve our services.

Whilst there are no accurate figures for the numbers of Travellers either nationally or locally the Government's carries out a twice yearly Gypsy & Traveller Caravan Count.

In January 2011 the Count identified that there were around 3,942 Traveller caravans in the South East:

- 1,386 (35%) on local authority or registered provider sites
- 1,893 (48%) on private sites (most likely owned by Travellers themselves)
- 663 (17%) on unauthorised sites

There are approximately 82 Gypsy and Traveller sites owned by local authorities or registered social landlords in the South East with a total of 1,053 pitches (1,000 permanent and 53 transit pitches). In total these sites have a capacity for 1,442 caravans.

Almost half of all Traveller caravans are on private sites. Using the same caravan to pitch ratio from the public traveller sites we estimate that there are around 1,438 pitches on 112 private sites. In reality, private sites are likely to be smaller than their public counterpart so we can expect there to be many more than 112 private sites in the region.

Site provision in Sussex

In Brighton & Hove, East Sussex and West Sussex there are a total of 17 local authority and registered provider sites, providing 187 pitches, 151 of which are permanent and 36 are transit pitches.

In addition to the sites provided by local authorities and registered providers there are approximately at least a further 136 pitches across Sussex on privately owned sites, the majority owned and managed by Travellers themselves. 113 caravans have permanent planning permission and 23 with temporary planning permission. An additional 58 caravans are on Traveller owned land without planning permission.

*“In my childhood there were many places to stop but landowners are not as tolerant as before.”
(Resident from Traveller heritage)*

Site provision in Brighton & Hove

In Brighton & Hove there are no private sites but there is one authorised Traveller site, Horsdean, which has 23 pitches and is managed by the council. This is a transit site, which means it provides a temporary stopping point for up to three months and Travellers pay rent and a charge for utilities. This site represents almost 2/3 (63%) of all transit pitches in Sussex.

Traveller Sites in Sussex



- Local Authority or Registered Provider Site
- Private Site

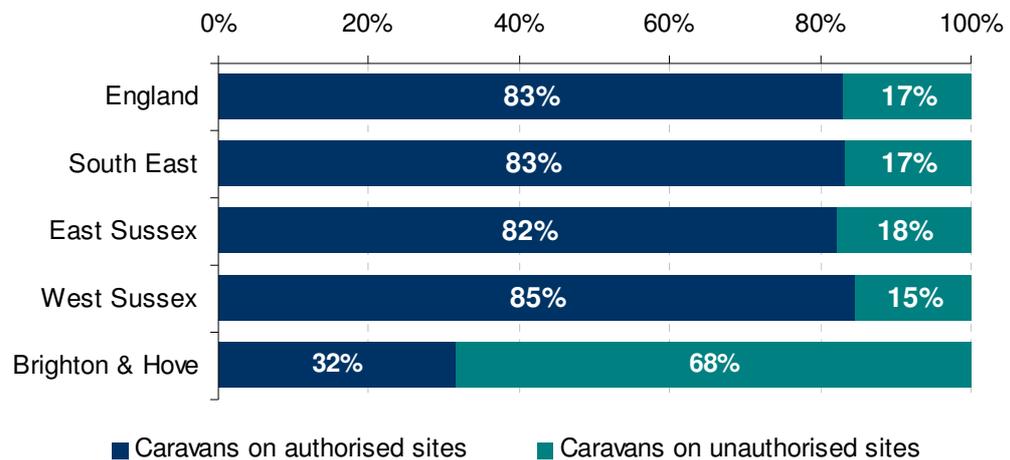
3.2 Unauthorised Encampments

The Government accepts that due to a national shortage of stopping places, unauthorised encampments are likely to continue.

Across the whole of England, the South East and Sussex on average around 1 in 6 Traveller caravans (17%) are on an unauthorised site. If we include Travellers living in bricks and mortar housing then less than 6% of all Travellers in England are on unauthorised sites, a sharp contrast to popular perception.

Despite there being a smaller proportion of Travellers visiting Brighton & Hove than might be expected for a population our size¹⁶, locally 2 out of every 3 caravans (68%) were on unauthorised sites, 4 times the rate of other areas.

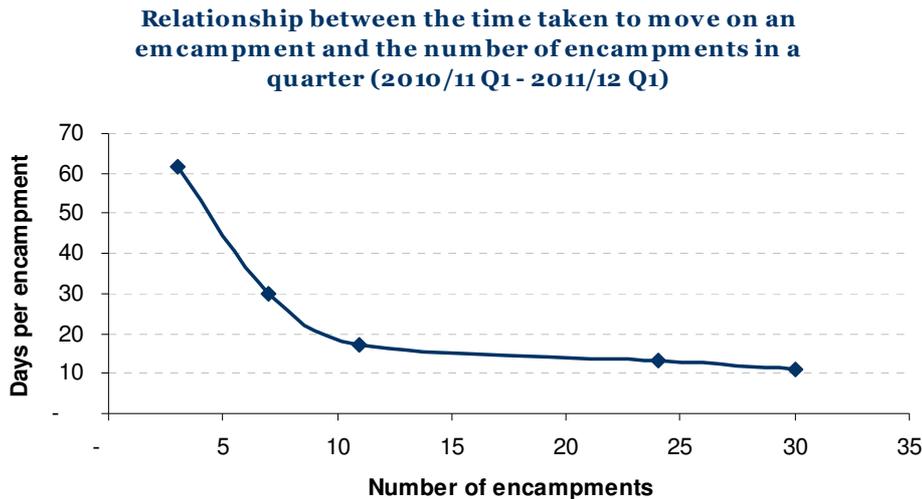
**Caravans on Authorised and Unauthorised Sites
DCLG: Gypsy & Traveller Caravan Count
(January 2011)**



Nationally, the loss of stopping places over the last few years culminated in 2011 seeing unauthorised encampments in the city on much higher profile sites.

¹⁶ We believe the Count included some Van Dwellers so the actual proportion of Travellers visiting would be less that the figures quoted

Whilst swift action saw them moved on twice as quickly as in previous years this caused the Traveller groups to break into a larger number of smaller encampments causing further disruption:



The evidence strongly suggests that the high profile nature of Travellers in the City recently is not because more Travellers are visiting the city but because there is a genuine shortage of stopping places for them around the region.

3.3 The City's need for Traveller pitches

Despite there being a small proportion of Traveller caravans in the City when compared to the South East, the caravan count data indicates they are 4 times more likely to be on an unauthorised site than regionally.

The accommodation needs of Travellers fall into 4 groups:

- Bricks and mortar housing – travellers who, for a variety of reasons, require or desire bricks and mortar housing
- Permanent sites – for those with a local residential need
- Transit sites – managed sites for those visiting the city for a short period of time
- Stopping places – unmanaged open areas by or near the roadside where Travellers can stop for 1-2 nights whilst moving between areas

Bricks and mortar housing

Nationally it has been estimated that most Travellers live in bricks and mortar housing (around 2/3 of Travellers) however studies have shown that this option is not desirable for many and is often only used as a last resort due to health needs or because the travelling way of life has become too difficult.

Should a Traveller household find itself in housing need it is supported in resolving this need as with any other resident household, whether this be owner occupation, the private rented sector or social housing.

Once we receive the results of the Census 2011 at the end of 2012 we hope to gain a better understanding of our housed Traveller population.

Permanent site needs

Permanent sites provide long term secure residential pitches for either caravans or mobile homes. Nationally, the majority are on land owned and managed by Travellers themselves with a smaller number provided by local authorities and registered providers.

The Partial Review of the South East Plan Process 2007-2010 identified a shortage of permanent traveller pitches in the South East, with a need for 16 permanent pitches in Brighton & Hove by 2016 (14 of these by the end of 2011).

Although Horsdean is a transit site, some pitches are currently occupied by Traveller households who are in need of permanent pitches. The provision of a permanent site would free up the blocked transit pitches for those visiting the city.

Transit site needs

Transit sites provide short term pitches for Travellers to stop for 1-3 months at a time whilst they are visiting an area for work, family matters or a holiday. Traveller pay rent on transit sites to contribute to the cost of site management and services such as electricity, water, waste and Council Tax.

During the summer there is an increase in the number of Travellers visiting the Brighton and Hove area for holidays or to obtain work locally. Potentially this can be up to 50 households at any time.

However, even in the winter months during the quieter periods, there are more Travellers in the city than can be accommodated at the Horsdean site. As a result, there have been unauthorised encampments all year round although some of these have been Van Dwellers rather than Travellers.

Stopping Places

These are informal sites where Traveller stop for 1-2 nights when moving between areas however their availability has been steadily eroded over the last 300 years.

Overall pitch need

Whilst the Partial Review of the South East Plan Process 2007-2010 concluded that a permanent site would satisfy the city's needs for permanent Traveller pitch provision up to 2016, we should also consider the potential permanent pitch requirements beyond 2016 and the short term demand for stopping places from those visiting the city.

It is expected that the ongoing requirement for permanent pitches will mainly be small numbers associated with additional demand arising from household growth.

Once a permanent site is delivered then this will allow the transit site at Horsdean to be more effectively used to accommodate short term traveller demand.

Using the Government's Gypsy & Traveller Caravan Count we have estimated that the city may have a potential demand for up to 30 short term pitches above that currently provided, although as the table below clearly illustrates, this is likely to vary considerably over time. Furthermore, as the Count included some Van Dwellers, then short term pitch demand for Travellers is likely to be less than that indicated below:

Potential Short Term Pitch Demand	Jul 2009	Jan 2010	Jul 2010	Jan 2011
Caravans on unauthorised sites ¹⁷	33	47	52	41
Pitch requirement for those on unauthorised sites ¹⁸	25	36	40	31
Less: vacant pitches at Horsdean Transit Site ¹⁹	0	23	0	4
Extra short term pitch demand before permanent site	25	13	40	27
Potential short term pitch demand once permanent site developed²⁰	14	2	29	16

To meet the permanent need requirement to 2016 and the demands of those visiting Brighton and Hove on a short term basis in order to minimise any potential for unauthorised encampments, a capacity for up to 68 pitches would be required:

- Horsdean Transit Site - 23 pitches
- Proposed Permanent Site - 16 pitches
- Additional potential demand - up to 29 pitches²¹

To help meet this need, our strategy seeks to be preventative in nature rather than reactive by:

- Ensuring effective management and use of the Horsdean Transit Site
- Developing procedures for Tolerated sites
- Effective management of unauthorised encampments
- Ensure sensitive sites are protected
- Developing a protocol for addressing Van Dwellers

¹⁷ From Government's Gypsy & Traveller Caravan Count which includes some Van Dwellers

¹⁸ Assumes 1.32 caravans per pitch. Caravans per pitch calculated from 1,053 known public sector pitches in South East with 1,386 caravans on them in the Jan 2011 Caravan Count

¹⁹ Horsdean was closed for refurbishment over winter 2009/10

²⁰ There are 11 pitches in the Horsdean site occupied by families who would most likely be eligible for the permanent site once developed (although this is still subject to the allocations policy which is yet to be determined)

²¹ Estimated maximum as these figures include some Van Dwellers

4. Traveller health and wellbeing needs

4.1 The health and wellbeing of Gypsies and Travellers

There has been limited rigorous research on the health of Gypsies and Travellers in England, and no long term follow up studies so we have to rely on snapshot survey data to assess the health needs of this group.

The most comprehensive study of Gypsy and Traveller health in England compared their health status with that of rural communities, deprived inner-city White residents and other ethnic minorities and found that for many indicators Gypsies and Travellers experienced worse health. These health inequalities are attributed to a combination of educational disadvantage, environmental hardship, social exclusion and cultural attitudes²².

We know from national research that:

- Gypsy and Traveller communities have a very different age distribution to the general population, with a high proportion aged under 16 years and much lower proportion aged over 50 years.
- Gypsies' and Travellers' life expectancy is significantly lower than other deprived groups and they are more likely to report poor health status and health problems which limit their daily activity.
- The most marked inequalities are for self-reported anxiety, and respiratory problems including asthma and bronchitis.
- Gypsies and Travellers are more likely to experience miscarriages, stillbirths, and the death of a child. Low birth weight is common.
- Mental health problems are thought to be common among Gypsies and Travellers, due to a range of factors including

²² Parry G, Van Cleemput P, Peters J, Walters S, Thomas K, Cooper C. *Health status of Gypsies and Travellers in England*. *Journal of Epidemiology and Community Health*, 61(3), 198-204, 2007.

the stress of living with discrimination and hostility. A lack of awareness of services and high levels of stigma hinder engagement with mental health care. Similarly, substance misuse is believed to be common^{23,24}.

- Anecdotal reports describe significant oral health problems among Gypsies and Travellers, including reports of children with dental problems requiring hospital intervention, and a general lack of awareness of good dental health^{25,26}.
- Lifestyle factors include a very high smoking prevalence, with estimates ranging from 47%²⁷ to 58%²⁸; a high prevalence of overweight (35%) and obesity (31%), particularly among men¹⁶; low levels of physical activity; and poor diet²⁹.
- Uptake of preventative services such as immunisations is believed to be low, and the Department of Health has stressed the importance of reaching out to Gypsy and Traveller communities to offer immunisations.
- Similarly uptake of screening services is thought to be low, for a range of reasons including cultural factors and logistical barriers such as appointments systems relying on GP registration, and postal communication.

²³ Lau A. 2010. Developing a mental health strategy for Gypsy Roma Travelling communities. Mental Health Equality Board. Available at: <http://www.nmhdu.org.uk/silo/files/developing-a-mental-health-strategy-for-gypsy-roma-traveller-communities.doc>

²⁴ Goward P, Repper J, Appleton L, Hagan T. Crossing boundaries. Identifying and meeting the mental health needs of Gypsies and Travellers. *Journal of Mental Health* 2006;15(3):315-327.

²⁵ Matthew Z, Edwards T, Sillman S, Benwel S. A Collaborative Programme to Improve the Oral Health of the Gypsy and Travelling Communities in Sussex. Friends, Families and Travellers 2010.

²⁶ Office for Public Management. Health and social care needs of Gypsies and Travellers in West Sussex. Report to NHS West Sussex and West Sussex County Council. October 2010. Available at: http://www.westsussex.nhs.uk/domains/westsussex.nhs.uk/local/media/publications/Health-professionals/8031_Gypsies__Travellers_report_FINAL_Oct_10.pdf

²⁷ NHS East of England. Lifestyle Survey – Gypsies and Travellers Draft Report. August 2009. Available at: <http://www.erpho.org.uk/viewResource.aspx?id=20364>

²⁸ Peters J, Parry GD, Van Cleemput P, Moore J, Cooper CL, Walters SJ. Health and use of health services: a comparison between Gypsies and Travellers and other ethnic groups. *Ethn Health* 2009;14(4):359-77.

²⁹ Cemlyn S, Greenfield M, Burnett S, Matthews Z, Whitwell C. Inequalities Experienced By Gypsy and Traveller Communities: A Review. Equality and Human Rights Commission. Manchester 2009.

4.2 Living conditions and Gypsy and Traveller health

Living conditions are well recognised as an important determinant of health. Various factors relating to housing quality affect health, such as cold and damp, infestation, noise, overcrowding, access to amenities, safety and hazardous structures³⁰, and many of these are particular problems for Gypsies and Travellers.

We know from national research that:

- Unauthorised sites usually have no facilities for sanitation, rubbish disposal, clean drinking water or electricity³¹.
- A survey of local authority sites in 2002 found that 10% of amenity units were unfit for purpose, with problems including vermin infestation, damp, lack of heating and poor build quality³².
- Poorly designed sites may contain a range of potential health hazards, such as a lack of footpaths to prevent road traffic accidents, unsafe storage of LPG cylinders and lack of fire safety standards³³.
- For Gypsies and Travellers, freedom, choice and proximity to family networks are important and bring health benefits, and living on unauthorised encampments and being forcibly moved on is stressful and detrimental to health³³.
- A large proportion of Gypsies and Travellers live in permanent housing, sometimes due to illness. However moving into housing can have an adverse effect on their health, particularly mental health^{22,34}.

³⁰ Taske N, Taylor L, Mulvihill C, Doyle N. Housing and public health: a review of reviews of interventions for improving health – evidence briefing. NICE 2005.
www.nice.org.uk/page.aspx?o=526671

³¹ Atterbury J. Fair Access for All? Gypsies and Travellers in Sussex, GP Surgeries and Barriers to Primary Healthcare. Friends, Families and Travellers 2010. Available from:
<http://www.gypsy-traveller.org/resources/documents/>

³² Niner, P. (2002) The provision and condition of local authority Gypsy / Traveller sites in England. London: Office of the Deputy Prime Minister (ODPM). Available at:
<http://www.communities.gov.uk/documents/housing/pdf/138832.pdf>

³³ Van Cleemput P, Parry G, Thomas K, Peters J, Cooper C. Health-related beliefs and experiences of Gypsies and Travellers: a qualitative study. *J Epidemiol Community Health* 2007;61:205-210.

³⁴ Cullen S, Hayes P, Hughes L. Good Practice Guide. Working with housed Gypsies and Travellers. Shelter 2008. Available from:
http://england.shelter.org.uk/_data/assets/pdf_file/0010/57772/Working_with_housed_Gypsies_and_Travellers.pdf

- There is some evidence to suggest that Gypsies and Travellers living in a house are more likely to have a long term illness, a poorer health state or anxiety. Those who rarely travel have the poorest health²².

4.3 Access to health services

Gypsies and Travellers experience a range of barriers to accessing health services, and may avoid seeking healthcare until a problem is well developed.

The nomadic nature of the Gypsy and Traveller lifestyle means that those who are travelling are at risk of being lost between services in different geographical areas. They may be unable to stay in an area long enough to obtain follow up care for specific health problems, or to receive results of screening or diagnostic tests. Not having a fixed address compounds these difficulties as many health services still communicate with patients by post.

Barriers to accessing services include cultural factors and factors relating to the way services are organised.

We know from national research that:

- Gypsies and Travellers can have low expectations of health, seeing ill-health as normal. Their culture includes pride in self reliance and stoicism, and this coupled with a fatalistic attitude and an intense fear of diagnoses such as cancer can lead to avoidance of services such as cancer screening, and reduce the likelihood of seeking early treatment³³.
- A lack of access to primary healthcare is a common problem for Gypsies and Travellers. They can have difficulties registering with GPs due to discrimination, requirements to have several forms of ID, or being required to register as temporary patients, meaning they are excluded from services such as screening^{26, 31}.
- Gypsies and Travellers may be inadvertently excluded from accessing health services due to a lack of information

in a suitable format for their needs. Low literacy rates mean that they can struggle to read posters and leaflets and thus are unaware of many services such as cervical screening, diabetes check ups and mental health services, and can have problems reading instructions for taking prescribed medication³¹.

- Gypsies and Travellers culture does not encourage interaction between men and women outside of their family which creates barriers to discussing health problems with a member of the opposite sex, and men in particular are unlikely to seek healthcare at all until a problem develops²⁶.

4.4 Gypsies and Travellers' specialist health services in Brighton & Hove

All mainstream health services are accessible to the needs of Travellers. In addition there are a number of specialist services available in the city:

- A Health Visitor works specifically with Gypsies and Travellers in the city. They carry out regular outreach visits to the transit site and to unauthorised encampments to assess the needs of Gypsy and Traveller families, provide health advice and child developmental checks, and refer people to mainstream services where necessary.
- A weekly Traveller Women's Drop-in is held at Moulsecoomb Children's Centre, at which a wide range of health issues are discussed and health education and information on services is provided.
- There is a Specialist Midwife for Travellers based at the Royal Sussex County Hospital.
- A Health Trainer works with Gypsies and Travellers in the city on a one-to-one basis to help them make lifestyle changes and improve their health and wellbeing.
- The Health Trainers scheme also provides training to volunteers working with a range of communities, to enable them to support individuals to improve their health. A Community Health and Wellbeing Champion has been trained in this way specifically to work with Gypsies and Travellers in Brighton and Hove.

*"Health visitors can help access other services, like dentists and other special services. Midwifery services visiting site is known to everyone."
(Traveller)*

The specialist organisation Friends, Families and Travellers runs a Travellers Health Project across Sussex, with five outreach workers who provide information and advice to Traveller communities on how to look after their health, and how to access health services, including registering with GPs. These outreach workers each lead on specific areas such as mental health, and children and young people's health.

4.5 Domestic and sexual violence

Domestic and sexual violence occurs across all communities, irrespective of poverty and deprivation, education, age, sexuality, ethnicity or ability. The vast majority of domestic violence is experienced by women, and perpetrated by men. A significant minority of men also experience domestic violence; it is experienced by transgender people, and it also occurs across heterosexual, lesbian, gay and bisexual relationships.³⁵

Although there are no reliable statistics on the number of incidents of domestic violence within Traveller communities, research suggests that the incidence is higher than in settled communities. For example, a 2007 study in Wrexham found that 61% of married English Gypsy woman and 81% of married Irish Traveller woman who were interviewed had experienced domestic violence compared to 45% of all women.^{36,37}

Women experiencing violence may often put their family first, prioritising the need to maintain the family unit over their own health and wellbeing. Cultural taboos in relation to involving the police and previous experiences of inequality and racism also discourage Traveller victims of violence from reporting and accessing mainstream services. A lack of awareness about services available to help victims and practical barriers

“People don't understand the shame felt by Traveller women around domestic violence and this is why they find it hard even to talk other women in the community about it.” (Traveller)

³⁵ Brighton & Hove Domestic Violence Needs Assessment 2011

³⁶ Roberts, A. Adkins, J. Lewis, H. & Wilkinson, C, 2007 'In Community Practitioners' and Health Visitors' Association (CPHVA) Annual Conference, Coronary Heart Disease and Mental Health in Gypsies and Travellers in Wrexham: Redressing the balance' Torquay, 31 October – 2 November 2007

³⁷ Walby, Sylvia and Allen, Jonathan (2004) “Domestic violence, sexual assault and stalking: Findings from the British Crime Survey”

such as poor literacy skills or limited access to a telephone means that they often feel that leaving an abusive relationship is not an option.

Women who do leave their husband often experience shame and discrimination and may have to leave the community entirely with the trauma of leaving the lifestyle they have grown up with; losing their extended family, home, culture, security and community. Often they will find themselves in an alien society, in bricks and mortar housing; isolated, vulnerable and open to prejudice, and without the financial means to support themselves.³⁸ Those who are re-housed need access to practical help, advocacy and support to help them recover from the violence and abuse, as well as help to deal with the loss of their community and the bureaucracies and financial hardship they may face.³⁹

Intervention is also needed with perpetrators in Traveller communities to stop the violence and to bring offenders to justice. This needs to be accompanied by work to raise awareness of domestic and sexual violence and the help available; to support Traveller communities to prevent domestic and sexual violence; and to develop interventions to enable Traveller men and other family members to stop perpetrating domestic and sexual violence.

Brighton & Hove Community Safety Partnership leads on tackling Domestic⁴⁰ and Sexual⁴¹ Violence focussing on prevention, early intervention and ongoing support. Friends, Families and Travellers provide support to victims of domestic violence and has a Sussex Community Outreach Service committed to improve Traveller access to domestic violence services and supporting victims.

³⁸ Brighton & Hove Domestic Violence Joint Strategic Needs Assessment, 2011

³⁹ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009; 'Good Practice Briefing: Working with Housed Gypsies and Travellers' London: Shelter 2007

⁴⁰ Domestic Violence Commissioning Action Plan based on the Brighton & Hove Domestic Violence Needs Assessment www.safeinthecity.info/files/Brighton%20%20Hove%20Domestic%20Violence%20Needs%20Assessment%20070411.pdf

⁴¹ Sexual Violence Action Plan [www.safeinthecity.info/files/Community%20Safety,%20Crime%20Reduction%20and%20Drugs%20Strategy%202011-14%20110708%20\(electronic\).pdf](http://www.safeinthecity.info/files/Community%20Safety,%20Crime%20Reduction%20and%20Drugs%20Strategy%202011-14%20110708%20(electronic).pdf)

5. Traveller education needs

5.1 Local authority responsibility to children

Local Authorities have a statutory responsibility to provide education for all school-aged children who live in their area, regardless of parental status or length of stay.

Brighton & Hove are committed to making this the best possible education for all our children. We know that a good education is a strong protective factor throughout life and so we should make all attempts to ensure these children receive their educational entitlement via a school placement.

The Learning and Partnership Unit's main aims are to raise achievement across the city and to tackle underachievement of vulnerable groups to close the gap between the performance of groups of learners, by raising standards and eliminating underperformance in the community.

5.2 National Traveller education profile

Nationally, Traveller children are the lowest achieving group in our schools. This has been and remains a long standing issue.

In 1967 The Plowden Report noted *"Traveller children's educational needs are extreme and largely unmet"*.

Successive reports over the next forty years have reinforced this initial finding.

In 2008 the Secretary of State for Education reported:
"For a range of complex reasons many Gypsy, Roma and Traveller pupils are amongst the lowest achieving in our schools and the situation is not improving....For far too long society has shunned people from these communities"

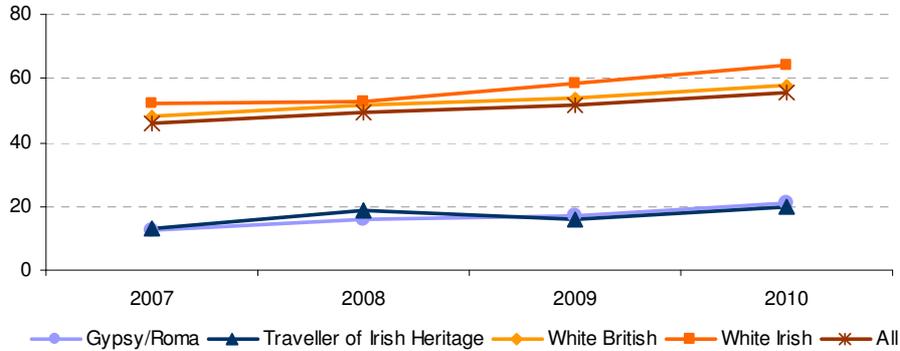
DCSF, National Strategies

The national performance data shows how wide that gap is:

Foundation Stage Profile: 2007-2010

Source: DfE

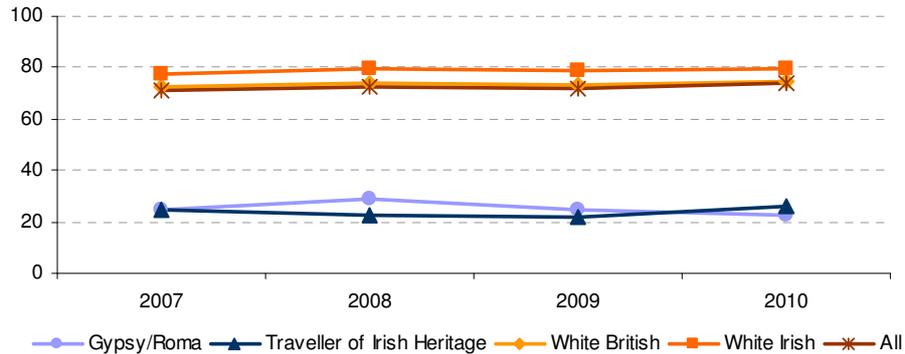
**Percentage of pupils achieving 6 points or more
in all PSE and CLL scales**



Key Stage 2: 2007-2010

Source: DfE

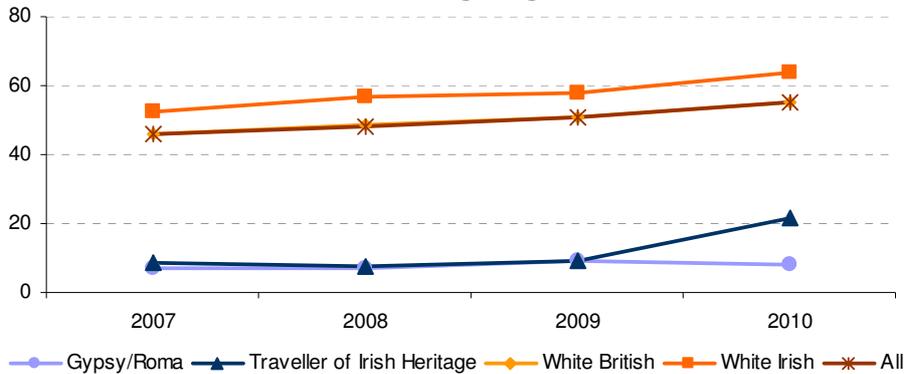
**Percentage of pupils achieving Level 4 or above
in English and Maths**



Key Stage 4: 2007-10

Source: DfE

**Percentage of pupils achieving 5+ GCSE
Grade A* - C including English and Maths**



However, all statistics to do with Travellers are notional as ethnicity is self defined and not all families are prepared to ascribe their ethnicity. Those unhappy with a school or fearful of wider discrimination within the wider community may not state their ethnicity. Mobile Travellers do not always participate in national tests or complete year 11. The reality of low attainment is likely to be worse than the published statistics suggest.

Historical data is not available as recorded ethnic categories (Gypsy / Roma and Travellers of Irish Heritage) have only been in existence within the education departments and schools since 2006 and only in the 2011 National Census.

5.3 Barriers to education

Studies reviewed by the Equalities & Human Rights Commission⁴² have identified strong common themes in relation to the barriers encountered by Gypsy and Traveller pupils. These include:

- enforced mobility and interrupted learning, consistent experiences of racist harassment and bullying, excessive exclusions linked to these experiences and to inadequate school responses
- the lack of validation of Gypsy and Traveller culture in schools
- the limited relevance of the curriculum for some pupils
- cultural barriers that children have to negotiate between home and school
- teachers' low expectations
- the impact of national targets on schools' readiness to admit Travellers

Parental literacy skills and the culture expectations within the travelling communities can be a barrier to young people engaging in education. For example, the domestic and caring expectations for girls, and for boys, cultural attributes unconnected with traditional educational achievement are more important.

⁴² 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

Early Years

Children from Traveller communities enjoy and learn greatly from close and supportive family relationships, a culture in which children are highly valued, and in which they are involved as members of the community.⁴³

Play is an important part of children's development, but children in Traveller communities are often deprived of adequate play opportunities due to lack of on-site safe play facilities or living on sites that are far away from playgrounds and other play facilities.

Access to early years provision such as playgroups and nurseries can be made impossible due to enforced mobility, restricted or inaccessible due to the remoteness of some sites and undermined by cultural barriers.

5.4 Traveller education good practice

Comprehensive advice on good practice is outlined in several national documents:

Early Years

"As the value and significance of early years outreach work is increasingly recognised, both by the services themselves and by the families accessing outreach services, the need to share current practice, develop it further, build it into mainstream service delivery and monitor the quality of the work becomes greater. Where training programmes exist, provided by services working with Gypsy, Roma and Traveller families, outreach early years practice needs to be emphasised."

Save the Children – Early Years Outreach Practice

Gypsy Roma and Traveller Culture

"Policy makers and practitioners need to be aware of the cultural capital within Gypsy Roma and Traveller communities that can be tapped to provide much enrichment to educational

⁴³ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

provision at all levels. These strengths should be noted so that any prejudicial viewsare countered and challenged”

DCSF The National Strategies – Raising Gypsy Roma and Traveller Achievement

Schools

“The response to school of Travelling pupils is crucially influenced by the Travelling children’s awareness of the level of their acceptance by teachers and other pupils. Where the presence of Travelling children is openly acknowledged and where accurate and positive images of the different nomadic communities are featured within both the resources of the school and the curriculum, then the response is lively and there is an openness to learning”

HMI – Education of Travelling Children

Local Authorities

“(Local authorities should) ensure actions to support higher levels of achievement for GRT children and young people are prioritised within Local Authorities Children’s Services Plans, including actions to support the needs of children from unauthorised sites”.

DCSF - The National Strategies

“The children being at school has helped a lot – they start to get to know us and they don’t treat us any different. Same as the local shops and hairdressers – they’ve got to know us and it helps.”

(Traveller)

5.5 Support for Traveller children and families

In meeting the additional needs of Traveller children, the City Council funds a specialist educational support service that works with other agencies in the city to support Traveller children and their families.

The service supports the education of Traveller children through mobile teachers, Traveller Welfare Officers and pre-school workers, and helps families and pupils to find a school place and gives advice to schools and can provide support to ensure a Traveller pupil’s confident admission into schools as well as supporting children’s learning. The specialist teachers also provide advice, training and resources to schools and others on cultural awareness.

Early Years children aged under 5 supported (2010/11)

Children aged 0-1 seen on play bus by Health Visitor	19
Children aged 2-5 provided with outreach play activities	122
Children aged 3-4 enrolled in nurseries or nursery classes	20

Traveller children in Brighton & Hove schools (2010/11)	Primary	Secondary	Total
Pupils enrolled in a school for all/part of year	55	8	63
Percentage attendance (actual/possible)	84%	86%	(this is above the national average)
Schools with Traveller pupils	12	3	15
Visiting fairground/circus children supported with distance learning	8	2	10
Mobile children resorting to the area who we tried to engage but did not attend any school	15	10	25
Elective Home Education	0	0	0

The Traveller Education Team is part of a network of support and services to Travellers and works closely with the Traveller Liaison service and other Traveller professionals. The service provides advice, training and resources to support cultural awareness and successful inclusion of Traveller children.

The Team have been involved in projects that support cultural awareness like Gypsy, Roma and Traveller History Month.

The Play Bus

The Brighton & Hove Play Bus is an outreach service that offers a range of free play opportunities and activities for children and young people between the ages of 4 and 11 years across the city all year round.

The bus is fully equipped including lots of items to stimulate different aspects of play and provides weekly session for Travellers' children and young people.

Early Years

The Traveller Education Team mobile outreach unit is supported by a BME designated Health Visitor plus a BME Early Years Worker who visits all encampments jointly with the peripatetic Early Years Teacher and Traveller Welfare Officer.



Training Material

The Traveller Education Team are developing a range of DVDs and other resources in collaboration with our Traveller communities which are widely used for training purposes and promoted both nationally and internationally. They aim to dispel myths and increase knowledge and understanding of the rich history and traditions of Gypsies, Roma and Travellers.

Our latest resource called "Poetry in Motion" will be launched in April 2012 and captures young Travellers lives and experiences in verse.

Other Achievements

Three Traveller children in Brighton & Hove schools were awarded prizes in the Gypsy, Roma and Traveller History month national storytelling competing in their respective age groups.

6. Resident concerns about unauthorised encampments

6.1 Impact on the settled community

Responses to this consultation, resident complaints, recent public events and articles in the local press have highlighted a number of resident concerns which are almost exclusively focussed on unauthorised Traveller encampments in local communities, and include problems such as:

- the loss of public space
- anti-social behaviour, crime and nuisance
- rubbish and fly tipping
- damage to the environment
- cost of site clearance and legal action

The most common request from residents is for the encampment to be moved on immediately however this is not usually possible and not always appropriate. For an encampment to be moved on without a court order (a court order can take several months to obtain) the local authority must request that the Police use their powers under Section 61 of the Criminal Justice & Public Order Act 1994 to direct the campers to leave the land. However, just the presence of an encampment without any additional aggravating factors does not provide enough grounds for the Police to use Section 61 so the Council must use the more lengthy court procedure.

The Police decision to evict or not must be balanced and compliant with the guidance, rule of law and to an extent the terms of the Human Rights Act 1998, demonstrating legality, necessity, and proportionality, as well as principles of common humanity. The balance to be struck is between the rights the local community, the local authority as a landowner and provider of social facilities (parks playing fields etc) and the rights of Traveller groups. Police guidance states that officers must be sensitive to the fact that there is a lack of pitches on authorised sites across the country making it difficult for people to avoid setting up unauthorised pitches.

Sussex Police Force Policy on Unauthorised Encampments (draft pending approval)

Operational Decision Making - Section 61

In agreeing to invoke powers under Section 61 CJPO Act 1994 it must be shown that unauthorised campers have failed to respond to requests from or on behalf of the legal occupier of the land, and that any notice period given by them had expired. The Superintendent / Chief Superintendent making the decision must be satisfied that:

- two or more people are trespassing on land, and
- they are present there with the common purpose of residing there for any period, and
- that reasonable steps have been taken by or on behalf of the occupier to ask them to leave, and
- that any of those persons have caused damage to the land or property on the land or used threatening, abusive or insulting words or behaviour towards the occupier, a member of his family or an employee or agent of his.

OR

- that people on the land have between them six or more vehicles.
- The Superintendent / Chief Superintendent must also be satisfied that a need for immediate action is met because:
 - The location of the encampment presents a risk to those on the site (e.g. contaminated land or other hazard) or,
 - The land itself is of a particularly sensitive nature (e.g. Site Of Special Scientific Interest) or,
 - It can be shown the presence of the encampment is seriously disrupting the ability of the settled community to make use of facilities or conduct their business (e.g. village greens, school grounds during term time, urban car parks, urban parkland including sports pitches, retail, leisure or business parks).

Such a process must be applied each time enforcement action is considered, even if the circumstances relate to a group that merely moved a short distance from a previous location.

Where immediate enforcement action under Section 61 is seen as a justified and proportionate response, then there may be occasions where it will be inappropriate to await the outcome of welfare enquiries conducted by the local authority. In these circumstances it will be essential to demonstrate that proper account of humanitarian considerations had been made. The local authority must be informed of the action taken by police as soon as possible.

The decision to serve a notice under Section 61 should take into consideration that if anti social or criminal behaviour is focused amongst particular individuals within the group, or if a member of the group is ill, it may be appropriate to take action to evict some of the group but not other members of the group.

Please note that this draft text will be updated with the final policy wording once approved later in 2012

Failure to follow the correct procedures when dealing with unauthorised encampments will delay eviction and can result in costly legal battles.

Local Authorities

Local authorities have legal obligations to all people within their boundaries. These obligations include duties towards children, to provide healthcare and other welfare support and to assist homeless people. Before considering how to deal with an unauthorised encampment the council must consider its obligations and will need to talk to the Travellers to determine any welfare needs.

Each encampment must also be considered on its merits against criteria such as health and safety, traffic hazards, public health risks, serious environmental damage, genuine nuisance to neighbours, planning considerations and the proximity to other land-uses.

Police Powers

Whilst the Police do not have the same specific obligations as local authorities they do need to follow guidance. The Police response must take into account whether there has been criminal activity, anti-social behaviour and the impact on the landowner and settled community rather than simply because encampments are present at a specific location.

In managing unauthorised encampments officers must be sensitive to the fact that there is a lack of pitches on authorised sites across the country, making it difficult for people to avoid setting up unauthorised pitches.

Private Landowners

Private landowners can use their Common Law rights to regain possession of their land and evict trespassers. This does not require the involvement of the Courts and can be enforced by the landowner or private bailiffs. The landowner may use no more force than is reasonably necessary to evict.

Powers to Tackle Unauthorised Encampments	Practical Use
Local Authority Powers	
<p>Part 55 Civil Procedure Rules Allows any landowner (or lessee) to gain possession of his/her land. This is done through a County Court hearing and a Bailiffs Warrant is sought, a date to carry out the eviction will then be set. The use of this power means that those individuals cannot return to the location for a period of three months.</p>	<p>As this needs a Court hearing even the most straightforward cases can take many weeks. This does not stop the Travellers from occupying another unauthorised site in the city.</p>
<p>Section 77-78 Criminal Justice & Public Order Act 1994 Can be used on any land within the local authority area including the highway and gives the local authority the power to direct individuals to leave the land and remove their vehicles and belongings. If the individuals fail to move the case can be taken to a Magistrates' Court to obtain an Order for the Removal of Persons and Vehicles.</p>	<p>This power is used infrequently in relation to land (as opposed to highways) with Travellers as the authority has to identify the owner of each vehicle and serve separate notices. This can be very costly as vehicles come and go and is unlikely to clear all vehicles quicker than a court order. This does not stop Travellers from occupying another unauthorised site in the city.</p>
<p>Quia timet Injunctions and Anti-Social Behaviour Orders Where particular individuals or groups repeatedly return to an area it may be appropriate to consider a preventative injunction. Further options such as injunctions or Anti-social Behaviour Orders, may be appropriate in certain circumstances.</p>	<p>To obtain an injunction or anti-social behaviour order requires a large amount of evidence. This approach has been little used but we are considering its use where we have built up enough evidence.</p>
Police Powers	
<p>Section 61 Criminal Justice & Public Order Act 1994 The Police can use this power to direct unauthorised campers to leave the land, if they fail to leave having been requested by the landowner to do so by a particular time and date. The landowner initially makes a formal request to the Police to evict the Travellers and a senior police officer considers whether it is appropriate to use the power based on various factors and conditions being met. The use of this power means that those individuals cannot return to the location for a period of three months.</p>	<p>Travellers can be moved on within a day if necessary. However, the Police have to be proportionate in its use and must consider the impact on the community such as whether there has been anti-social behaviour or whether a community event is planned in the location.</p>
<p>Section 62A-E Criminal Justice & Public Order Act 1994 Allows the Police to direct unauthorised campers to leave the land where a suitable pitch on a relevant caravan site is available within the same local authority area. The Local Authority needs to confirm that an appropriate alternative pitch is available. The use of this power means that the individuals cannot return to anywhere within the local authority area (other than the site they have been directed to) for a period of three months.</p>	<p>Travellers can be moved on within a day if necessary however, our site at Horsdean is often full so the Police are unable to use this power. If the city had more official sites for Travellers this power could be used more effectively if needed.</p>

6.2 Addressing resident concerns

The Government acknowledges that due to a national shortage of stopping places unauthorised encampments are likely to continue so the Council works with the Police to manage these to minimise the disruption to local residents.

Loss of public space

The authority recognises its duty and responsibility to local residents to ensure they are able to enjoy the city's parks and open spaces whilst at the same time we are mindful that Travellers are an often marginalised group that we want to support in protecting their way of life. Whilst there are rarely enough grounds to evict an encampment straight away without a court order, the Council ensures that once an encampment does leave we return the area to its former condition so that residents can go on to enjoy their open space.

Anti-social behaviour, crime and nuisance

As with all groups of people, it is only a small minority of Travellers that are associated with crime and anti-social behaviour which can often, and unfairly, become associated with the rest of the community. Other Travellers will often shun those committing the nuisance recognising the impact it has on them and the rest of their community, particularly as it can lead to an encampment being required to move on at short notice.

Joint action by the Police and Council over the summer proactively targeted those with a history of committing anti-social behaviour to help protect residents and other Travellers.

Protecting the environment

Brighton and Hove has many areas that are considered sensitive in terms of their archaeology or biodiversity such as Sites of Special Scientific Interest, local nature reserves or part of the South Downs National Park. We take practical measures to ensure these sites are protected and should an encampment be causing significant damage then this may be enough grounds for the Police to take swift action under Section 61.

“I feel sad that the aggressive behaviour of a minority of Travellers creates such poor relationships with the rest of society and that the aggressive behaviour of a few of the rest of us inflames an already poor situation.”
(Resident)

Recently works have been completed to improve the protection at a number of sites important to local people including Withdean Park, Stanmer Park, Greanleas Recreation Ground and the Ladies Mile Nature Reserve. However, being realistic, we recognise that measures will not stop someone determined to gain access.

Rubbish and fly tipping

The consultation highlighted that residents have noted that some Traveller communities take very good care with the land around their encampments and clear up after themselves whilst others do not. We are also aware that residents in the settled community have used Traveller encampments as an excuse to fly-tip their own waste.

This summer has seen a marked decrease in fly-tipping in the city due to the joint action by the Police and Council. Where evidence is available then action is taken against the perpetrators. For example, in September 2011 a Traveller from Burgess Hill was successfully prosecuted for fly tipping after being caught illegally dumping waste in a field on the outskirts of Brighton.

In the majority of cases fly-tipped rubbish belongs to local residents, whether it is garden waste, building rubble or general refuse that has been cleared by someone at a 'bargain' price. Unfortunately many people do not realise that if the waste is traced back to them then they will be prosecuted themselves which would deter many from having their rubbish cleared at these special low rates. Residents should check that those collecting the waste hold a waste carriers license which can be checked at the Environment Agency website⁴⁴.

Cost of site clearance and legal action

In 2010/11 legal and site clearance fees for dealing with unauthorised encampments was £130,010 (equivalent to around £1 of a household's annual council tax bill). This cost is funded through government grant and council tax.

⁴⁴ <http://www2.environment-agency.gov.uk/epr/search.asp?id=EP8&&type=register>

Those Travellers visiting or living on authorised sites pay a rent which helps cover the cost of managing the site, services and council tax. Unfortunately we are unable to charge those on unauthorised sites. Having more stopping places would not only ensure that Travellers are contributing to the cost of the city's services but would also reduce the level of unauthorised encampments and associated legal and clean up costs.

6.3 Co-ordinating our approach

Engagement with our communities is at the heart of developing existing and future policies and services to promote good race relations between Travellers and the local community and to increase community cohesion that will benefit all members of the community and reduce inequalities. This involves taking positive action to raise awareness of issues relating to Travellers and to combat some of the 'myths' that still surround the Traveller community.

Sussex Joint Local Authority Traveller Forum

This new group has been set up to help share good practice and co-ordinate a regional response to Traveller issues. The group is made up of representatives of Sussex Police, Brighton & Hove City Council, East Sussex County Council, West Sussex County Council and a number of local authorities. The group is aiming to develop a fair and consistent approach to unauthorised encampments that will apply across the whole of Sussex.

Multi-agency Traveller Team

The Multi-agency Traveller Team manages unauthorised encampments and includes the Traveller Liaison Team, Police, trading standards and waste enforcement officers. The Team is an effective means of partnership working, sharing information and organising joint visits to encampments.

Traveller Liaison Team

The Traveller Liaison Team's role is to provide support to those living a nomadic lifestyle within the city, making initial contact and carrying out health and welfare checks. They provide

*“Traveller liaison team, as a professional full time worker I have yet to meet one member of this team. However when I needed to contact them via phone they have always assisted me with my enquiries.”
(Traveller)*

primary support to Travellers and encourage them to access services such as health and education. The Team also aims to promote good race relations and equality of opportunity between communities and maintains partnerships with service providers to ensure a fair and coordinated approach.

In addition, the Team also manages the city's authorised transit site at Horsdean and responds to unauthorised encampments. This has involved taking legal action as well as allowing for periods of toleration when required, for example when there are health or welfare needs and providing advice and support to landowners and the public.

Sussex Police

During the summer of 2011 the Police implemented Operation Monza. The Council worked with the Police during this operation which saw officers make daily visits to the city's unauthorised encampments to raise awareness of acceptable behaviour and to deal with Traveller and resident concerns.

A Code of Conduct on Unauthorised Encampments was developed that outlines behaviour which may result in eviction and sets the same standards of behaviour expected of the settled community. This project saw a marked decrease in anti-social behaviour and other nuisance during this time.

Operation Monza is a police operation instigated in response to specific Traveller related problems on unauthorised encampments and will continue only whilst senior police officers consider it to be operationally necessary. The Tactical Plan for Operation Monza is reviewed on a yearly basis according to operational need.

Gypsy and Traveller Advisory Group

In recent years, Sussex Police have worked with the Sussex Traveller Action Group and Gypsy and Traveller communities to set up a Gypsy and Traveller Advisory Group. The group meets quarterly and is chaired by a member of the Gypsy community to address issues of concern.

“Operation Monza, where two police officers visited the site regularly – this gained trust, though some strangers might have misunderstood the visits.” (Traveller)

7. Consultation

7.1 Who did we engage?

In addition to working with other organisations to help develop the strategy it was important for us to engage local residents and the Traveller community to make sure that the Strategy represented and addressed their needs.

We received 108 consultation responses that were submitted via the Brighton & Hove City Council consultation portal, 15 responses through dedicated focus groups and one-to-one sessions representing 28 Travellers, 12 written contributions from individuals and organisations and 1 submission following a meeting with a service provider. In addition the Traveller Strategy Scrutiny Panel provided a detailed submission after gathering evidence from a wide range of sources. We also attended meetings of groups such as the Community Safety Forum and City Inclusion Partnership.

The findings of the consultation have been very valuable and resulted in many improvements to the strategy and action plan.

7.2 Resident views

A total of 100 responses were received from residents. It was clear from their contributions that opinions were divided with a wide range of views expressed. However there were common themes that emerged that showed that residents support a permanent site on the premise that unauthorised encampments will be reduced, want to see an end to unauthorised encampments, want to see a reduction in crime, nuisance and anti-social behaviour, want improvements in health and education within the Traveller communities and support protocols to address the city's Van Dweller issues.

Of those residents expressing a view:

- 48% supported the overall vision of the Strategy
- 59% responded supported a new permanent site

- 37% supported short-term toleration
- 63% supported improving the access to health and other support services for Traveller communities
- 67% supported improving educational outcomes for Traveller communities
- 83% supported tackling crime, anti-social behaviour and nuisance
- 67% supported the protection of sensitive sites
- 67% supported the development of protocols for addressing van dwellers

7.3 Travellers

A total of 18 Traveller households, representing 28 Travellers engaged with the consultation. 1 response was received through the Brighton & Hove City Council Consultation Portal and the other responses came through focus groups and interviews carried out on Traveller sites over the consultation period:

- **Permanent Site:** The responses highlighted the importance of the provision of a new permanent site to Traveller communities and how this provision would support better health, education and community cohesion.
- **Toleration:** The Travellers would also like to see tolerated sites provided, suggesting that the additional provision of a permanent site and designated stopping places, especially during the summer months, would help reduce unauthorised encampments.
- **Anti-social behaviour:** Travellers agreed that anti social behaviour and nuisance was not acceptable and supported measures to address these within the Traveller and settled communities and addressing discrimination suffered by Travellers was also an importance issue.

- **Health:** The responses highlighted the importance of accessing health services and identified some of the barriers suggesting that providing more services on site would help.
- **Education:** The importance of education was highlighted with a greater emphasis on early years' education than secondary school education, due to the expectation that young people from the Traveller communities should become independent from 14 years old.
- **Van Dwellers:** One Traveller responded to the proposal to develop a protocol for addressing van dwellers, suggesting there needs to be clear distinctions between van dwellers and Traveller communities.

7.4 Community & Voluntary Sector Organisations

There were 5 responses received from consultees who identified as being Community & Voluntary Organisations. One organisation expressed certain reservations but still welcomed the general approach demonstrated in the draft strategy. The other organisations supported the strategic vision, strategic outcomes, all the strategic goals and the involvement of Travellers in service design and delivery but would like the proposal to go farther and outlined ways to achieve this.

7.5 Service Commissioners and Providers

There were 7 responses were received from service providers and commissioners. 6 responses highlighted the importance of providing a permanent site, tolerated sites and advise Travellers to by their own land for development, providing helpful information and suggestions on service provision and delivery. The other response was a written submission that focused on goals that were pertinent to organisation and raised concerns about enforcement issues.

7.6 Community Champions

There were 3 responses from community champions. All of the responses supported all the strategic vision, strategic outcomes and goals highlighting the importance delivering of fit for purpose support services that will improve life experience for Traveller communities. These responses identified the importance of working with organisations with a proven record of working with Travellers communities and making sure that strategic links are made between the different goals.

7.7 Pressure Group

The pressure group supported the permanent site but disagreed with toleration and felt that the provision of sites for Traveller communities should not be addressed in isolation but alongside the wider needs of the residents in the city.

7.8 Responses from others

Two responses were received from visitors to the city and one response was received from a worker in the area. There was support for a permanent site, improving ethnic monitoring, access to education and tackling domestic violence.

7.9 Traveller Strategy Scrutiny Panel

The Environment & Community Safety Overview & Scrutiny Committee Traveller Strategy Scrutiny Panel has shadowed the development of the Traveller Commissioning Strategy from the outset. The panel was Chaired by a respected academic and included councillors from the three main political parties. The Panel received evidence from a wide variety of individuals and organisations including Traveller groups, resident groups, politicians other local authorities.

An interim submission from the Panel in response to the draft strategy and a subsequent formal report with final recommendations welcomed our overall approach and highlighted areas where they felt there were gaps. These submissions led to many improvements to the final strategy.

7.10 Methodology

In accordance with the Council's Community Engagement Framework, we provided stakeholders with the opportunity to let us know their views in two stages of consultation to give them the best possible chance of meaningful involvement:

- **1st Stage Consultation – scoping:** The first stage of consultation was undertaken over a period of 4 weeks, from 3 October to 5 November 2011 and provided local residents and stakeholders with the opportunity to comment on consultation topics covering a range of issues relating to Traveller and settled communities.
- **2nd Stage Consultation – draft strategy:** Consultation on our draft strategy that took place between 13 December 2011 and 6 February 2012. The draft strategy was developed from the findings of the 1st stage of consultation.

Our methods were based on feedback from previous consultations about accessible forms of engagement and took a number of forms:

- An online document and questionnaire was hosted through the Council's consultation portal and a hard-copy option made available through the provision of a freepost address for participants
- Written responses
- Focus groups and one-on-one sessions with Travellers. These groups were facilitated by the Council's Traveller Liaison Team and East Sussex Traveller Education Service Team commissioned by the Council's Education Department
- The Traveller Strategy Scrutiny Panel shadowed the development of the new strategy and met to discuss, comment and provide recommendations on the document

The consultation was advertised in the Argus and on the homepage of the Council's website and notification of the consultation was sent out to a wide range of stakeholders.

8. Our Strategy in Context

8.1 Linking to international, national and local policy

There has been a wide range of international, national, regional and local research and policies produced in response to disadvantages faced by many communities including Travellers.



Article 25 of the United Nations **Universal Declaration of Human Rights** (Resolution 217 A (III), 10 December 1948) has clear parallels with the strategic housing function:

Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control

In 1992, the United Nations adopted the **Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities** (Resolution No. 47/135). The declaration is made up of 7 articles that promote and protection of the rights of persons belonging to national or ethnic, religious and linguistic minorities.



The **European Convention on Human Rights** (ECHR) was approved in 1951 with the United Kingdom being a founder member. These rights were strengthened in UK legislation through the **Human Rights Act 1998** with Article 8 of the ECHR having particular relevance for housing:

Article 8: Right to respect for private and family life

- 1. Everyone has the right to respect for his private and family life, his home and his correspondence.***
- 2. There shall be no interference by a public authority with the exercise of this right except such as is in***

accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

Whilst these form the basic tenets for civilised society it is important to remember that fair and proportionate laws, such as those protecting the rights of land owners, still apply.

8.2 National Policy

In 2004 the Government produced new **Guidance on Managing Unauthorised Encampments** which aimed to balance the rights and needs of Travelling and settled communities. This was supported by the **Housing Act 2004** which required local authorities to assess the accommodation needs of Travellers. **Circular 01/06: Planning for Gypsy and Traveller Caravan Sites**, outlined how the planning system should ensure a suitable level of site provision.

The **Association of Chief Police Officers Guidance on Unauthorised Encampments** (ACPO, 2011) ensures that officers act proportionately when dealing with unauthorised encampments striking a balance between the rights the local community, the local authority as a landowner and provider of social facilities (parks playing fields etc) and the rights of Traveller groups.

The Government is replacing Circular 01/06 with the new **Planning Policy Statement for Traveller Sites** due to be published in 2012 which aims to put decisions on site provision in the hands of local authorities in response to local demand. The draft policy objectives for planning in respect of travellers sites are to:

- enable local planning authorities to make their own assessment of need for the purposes of planning
- encourage local planning authorities to plan for sites over a reasonable timescale

- ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- protect Green Belt from development
- promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
- reduce the number of unauthorised developments and encampments and make enforcement more effective
- ensure that the development plan includes fair, realistic and inclusive policies
- increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- reduce tensions between settled and traveller communities in plan making and planning decisions
- enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- have due regard to the protection of local amenity and local environment

The **Human Rights Act 1998** incorporates the European Convention on Human Rights into British law. Several convention rights are relevant to dealing with unauthorised camping especially; the right to respect for private and family life, the right to protection of property, the right to education, and the prohibition of discrimination. When considering an eviction from an unauthorised site the Human Rights Act requires authorities to have regard to whether the action is necessary and proportionate under the circumstances.

Under the **Equality Act 2010** local authorities are required to have due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Government's white paper ***Equity and Excellence: liberating the NHS*** represents one of the biggest shake ups of health services since the NHS was established in 1948. The White Paper outlines sweeping changes to the NHS with challenging and far-reaching sets of reforms. The vision of the White Paper is about putting patients and public first, improving healthcare outcomes, creating more autonomy, accountability and democratic legitimacy and cutting bureaucracy and improving efficiency.

The ***Children Act 2004*** seeks to ensure every child has the opportunity for:

- being healthy
- staying safe
- enjoying and achieving
- making a positive contribution
- achieving economic wellbeing

The Marmot Review ***Fair Society, Healthy Lives*** (2010) concluded that reducing health inequalities is a matter of fairness and social justice which can be addressed through six objectives:

- Give every child the best start in life
- Enable all children young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Ensure healthy standard of living for all
- Create and develop healthy and sustainable places and communities
- Strengthen the role and impact of ill health prevention

8.3 Local Policy

Brighton & Hove City Councils' ***Sustainable Community Strategy*** sets out the vision and plans of the agencies, organisations and communities that work together through the 2020 Community Partnership to improve the quality of life in this City. The eight priorities are:

1. Promoting enterprise & learning
2. Reducing crime & improving safety
3. Improving health & wellbeing
4. Strengthening communities & involving people
5. Improving housing and affordability
6. Living within environmental limits and enhancing the environment
7. Promoting sustainable transport
8. Providing quality advice and information services

Brighton & Hove City Council is committed to deliver high-quality, efficient and effective services working in partnership with the community and voluntary sector, the business community and residents. The five core priorities for the council's **Corporate Plan 2011/15** are:

1. Tackling inequality
2. Creating a more sustainable city
3. Engaging people who live and work in the city
4. A responsible and empowering employer
5. A council the city deserves

The adopted **Local Plan for Brighton & Hove (2005)** includes policies (HO16–18) which seek to safeguard existing Traveller sites and set out the range of planning considerations which proposals for new sites will need to address. The Plan acknowledges the need to make adequate site provision and to keep under review the demand and need for Traveller accommodation.

The new **City Plan for Brighton & Hove** will replace the 2005 Local Plan. It is anticipated that the City Plan (Part 1) will be adopted early in 2014. This Plan will set the planning policy framework for meeting assessed Traveller accommodation needs. It will include a criteria-based policy to guide site selection and to respond to planning applications for Traveller sites that come forward for sites over the plan period. Part 2 of the City Plan will, if necessary, include site allocations to respond to any outstanding requirements.

9. Strategic Outcome 1: Improve site availability

9.1 Increasing pitch provision

An appropriate supply of properly managed pitches will help to reduce the level of unauthorised encampments which will not only reduce conflict and tension between communities but it will help Travellers access health and education services.

*[Outcome 1 will]
"Hopefully generate
better relationships
between Residents
and Travellers."
(Resident)*

To make sure that the city provides suitable sites to meet the needs of the travelling communities our strategic goals under this priority are to:

- Goal 1 Develop a new permanent Traveller site
- Goal 2 Ensure effective management and use of the Horsdean Transit Site
- Goal 3 Develop procedures for Tolerated sites
- Goal 4 Consider the need for future site provision
- Goal 5 To provide advice to Travellers seeking to buy their own land for developing a site

9.2 Goal 1: Develop a new permanent Traveller site

The evidence gathering process behind the Partial Review of the South East Plan (2007-2010) identified a need for 16 permanent pitches in the City for those Travellers with local connections to Brighton & Hove.

Brighton & Hove City Council has been awarded government funding to develop a permanent site which will release some pitches on the transit site which are occupied by those in need of a permanent site and therefore provide pitches for Travellers wishing to stay for a few months in the area and will also help limit unauthorised encampments.

A site survey of more than 50 locations has found that land next to the current transit site for Travellers at Braypool Lane,

Horsdean would be the most appropriate location for a permanent Traveller site for the city.

The site survey used a methodology agreed by officers from both Brighton & Hove City Council and the South Downs National Park Authority. The council is now conduct an in-depth assessment of landscape, archaeology and biodiversity issues at the site before making a final decision on whether a planning application can go ahead.

Why a single site and not 2 or more smaller sites?

The project has considered whether it would be better to have smaller sites in the city however, this was discounted based on a number of reasons:

- A number of smaller sites would make it harder to meet the level of need by increasing risks such as cost, planning and community cohesion issues
- Each site requires the provision of infrastructure (water, sewage, electricity, access roads etc) in addition to the pitches which will increase the projects costs
- Aside from extra costs, additional sites bring additional planning risks given the shortage of available land and the controversial nature of some of the sites already considered by the site search given that they lie within the National Park
- The government guidance for site design suggests each pitch consists of a hard standing with space for a main and touring caravan, plus a car, and an amenity unit with a bathroom, kitchen and dayroom. There should be shared play space. All residents will pay rent, bills and council tax like any other tenant in social housing.
- Each site would have additional costs from the provision of services such as management, security, waste collection etc

If future needs analysis shows a need for additional sites, and we are successful in acquiring funding for those additional sites, then they are likely to be smaller as the present site search process has exhausted the options for large sites.

9.3 Goal 2: Ensure effective management and use of the Horsdean Transit Site

The Horsdean Transit site is a valuable resource for Travellers visiting the city. We need to make sure the site is used effectively to help minimise the need for unauthorised encampments.

The Council will be recruiting a site warden to ensure that the site is a safe, secure, pleasant, and welcoming environment for residents and visitors. The warden will ensure that residents do not outstay their visiting time, and that pitch and service fees are paid and to support Travellers with accessing services.

9.4 Goal 3: Develop procedures for Tolerated sites

Where there is a shortage of authorised stopping places the Government's **Guidance on Managing Unauthorised Camping**⁴⁵ states that it is good practice to allow some toleration for short periods in locations where the encampment does not have any adverse impact on the settled community.

The use of toleration allows welfare needs to be addressed and avoids having to evict the Travellers and risking an unauthorised encampment on a more high profile and unsuitable site. The law on toleration is complex and encampments could only be tolerated for short periods on certain sites during busy periods when Horsdean is full and Travellers have health or welfare needs.

*“As a traveller being on a tolerated site has been very helpful. Particularly for those suffering from mental health / anxiety issues and those with work commitments or children. It has meant a time of recovery and work on vehicles.”
(Traveller)*

9.5 Goal 4: Consider the need for future site provision

To minimise the number of unauthorised encampments we need to consider how we best manage the potential need for short term stopping places from those visiting the city. This could be through the provision of more stopping places, tolerating encampments in less sensitive locations and/or supporting Travellers to develop their own site(s).

We also have recognised the need for a permanent Traveller site to meet the city's need for permanent pitches to 2016. We will also need to look at any potential demand for permanent pitches after 2016. The authority is mindful that any response to identified need should be in the context of the wider needs of all the city's communities.

9.6 Goal 5: To provide advice to Travellers seeking to buy their own land for developing a site

Regionally, around half of Travellers live in caravans on sites owned and managed by Travellers themselves. In the vast majority of cases these sites have been developed with full planning permission however a small number do not. At the moment, Brighton & Hove has no private Traveller sites.

Whilst the Council is unable to provide legal advice, we are keen to offer Planning support to ensure that if a Traveller household or Community Land Trust wanted to buy and develop their own plot, that the land is more suitable for that type of development.

The Clearwater Gypsies have produced an excellent guide for West Sussex called 'Planning Made Simple'. We will look at supplementing this with local information once the Government has published its new planning policy in 2012.

This approach will provide more effective security for the Travellers and help them manage their own housing matters in a way more appropriate to their needs. In addition, this will reduce the risk of potential lengthy and costly legal disputes.

⁴⁵ <http://www.communities.gov.uk/documents/housing/pdf/157323.pdf>

Action Plan Summary

Strategic Outcome 1: Improve Site Availability

Strategic Action	Target	Current Position	Lead Partner
Goal 1	Develop a new permanent Traveller site		
Consult on preferred site prior to planning application	March - April 2012	Preferred site identified	Brighton & Hove City Council
Obtain planning permission for preferred site	Autumn 2012	Preliminary discussions in progress with National Park Authority	Brighton & Hove City Council & South Downs National Park
Develop site	Development throughout 2013	Subject to planning permission	Brighton & Hove City Council
Develop allocations and management policies	To be in place for site opening in winter 2013/14	To happen in 2013 subject to planning permission	Brighton & Hove City Council
Open site	Winter 2013/14	Subject to planning permission	Brighton & Hove City Council
Goal 2	Ensure effective management and use of the Horsdean Transit Site		
Appoint a site warden for the Horsdean Transit Site	Recruitment planned for Spring 2012	Job particulars agreed, advertising imminent	Brighton & Hove City Council
Review occupancy of the Transit Site to provide capacity to help minimise unauthorised encampments	Spring/Summer 2012 (and ongoing after)	Subject to Warden recruitment	Brighton & Hove City Council
Improve the collection of fees and service charges and deal effectively with arrears	Summer 2012 (and ongoing after)	Subject to Warden recruitment	Brighton & Hove City Council

Strategic Action	Target	Current Position	Lead Partner
Goal 3 Develop procedures for Tolerated sites			
Research Good Practice and develop guidance on toleration	Winter / Spring 2012	Research in progress	Brighton & Hove City Council
Consult and Equality Impact Assessment	Spring 2012	To be planned	Brighton & Hove City Council
Implement	July 2012	Policy to be ready for peak season	Brighton & Hove City Council
Goal 4 Consider the need for future site provision			
Traveller accommodation needs assessment	Subject to guidance but required to plan for post 2016 need	New guidance expected in 2012	Brighton & Hove City Council
Monitor size, duration, frequency, make up of unauthorised encampments	Build up a picture of need and demand particularly once permanent site open	Ongoing work	Brighton & Hove City Council
Implement further requirements of new government planning guidance	Subject to guidance	New guidance expected in 2012	Brighton & Hove City Council
Plan according to new guidance	Subject to guidance	New guidance expected in 2012	Brighton & Hove City Council
Ensure new City Plan recognises identified needs to 2016 and the need to consider future needs provision	Plan proposed adoption end 2013	Plan in development	Brighton & Hove City Council
Goal 5 To provide advice to Travellers seeking to buy their own land for developing a site			
Planning advice to travellers seeking to buy their own land for developing a site	Appropriate advice provided as and when required to build on existing good practice	Ongoing	Brighton & Hove City Council

10. Strategic Outcome 2: Improve health, safety and wellbeing

10.1 Health and wellbeing inequality

Travellers have a much poorer health and a significantly lower life expectancy than the general population attributed to:

- A shortage of permanent sites making it difficult to access services or maintain treatment
- The general struggle of life on the road
- Cultural factors including stoicism and tolerance of ill health amongst Travelling communities
- A lack of cultural awareness amongst professionals
- A mistrust of professional agencies by Travelling communities

The success of our objective is heavily dependent on *Objective 1: Improve site availability* which will help Travelling communities and professional build the trust and relationships essential for effective health, care and support services.

As with all sections of society, ensuring the health, safety and wellbeing of the Traveller communities not only raises the quality of life for one of our most disadvantaged communities, it also reduces long terms costs public health costs. Hence, our strategic goals under this priority are to:

- Goal 6 Improve access to health and other support services for Travellers in the city
- Goal 7 Improve cultural awareness in health services
- Goal 8 Improve ethnic monitoring in health and other services to include Travellers
- Goal 9 Tackle domestic and sexual violence

“Look at ways to make services more accessible to Traveller families. Starting with asking them what they want / need and what prevents / make it harder for them to access these services.” (Worker in the area)

10.2 Goal 6: Improve access to health and other support services for Travellers in the city

Travellers experience a range of barriers to accessing health services which mean they may not seek healthcare until a problem develops, and can miss opportunities to prevent ill health.

To address this gap the Council and NHS Sussex (Brighton & Hove) will conduct specific needs assessment on the health and wellbeing of Travellers. The assessment will be used to develop an action plan to improve access to healthcare services for members of the Traveller community.

In addition, there will be a citywide review of Health Visitors which will consider the impact the service has on the Travelling community.

It will also be important to ensure health needs and access to health services are considered in the selection and development of a new permanent site in the city.

“Ask a traveller to come in and talk to health service professionals. Ask health service professionals to visit traveller sites and talk about the issues they face with regards to helping travellers so travellers can see how they can help as well.” (Resident)

10.3 Goal 7: To improve cultural awareness in health services

A lack of access to healthcare is a common problem for Gypsies and Travellers and improving this requires services to be responsive to their cultural needs. This includes providing information about services in a suitable format, and being adaptable to encourage Travellers to seek healthcare early in the event of illness. Cultural awareness training for health service staff is an important aspect of this

10.4 Goal 8: To improve ethnic monitoring in health and other services to include Travellers

National NHS ethnic monitoring does not include Travellers and so there is a lack of information about which services they use. Without this type of information it is difficult to plan and deliver services to this community, and to evaluate effectiveness of services.

Developing NHS ethnic monitoring locally will help provide us with information on the services used and needed by Travellers to ensure we can plan provision more effectively. In addition, improving the cultural awareness of services will help to encourage Travellers to identify their ethnicity when accessing services.

The council has been piloting new monitoring guidance that include Travellers. However, due to the complexities of IT systems this will take time to roll out across services. As this information begins to be collected and analysed we will be able to build a more accurate picture of service use by Traveller communities.

10.5 Goal 9: Tackle domestic and sexual violence

Whilst there are no reliable statistics on domestic and sexual violence in Traveller communities the small scale research that has been carried out suggests that domestic violence is far more frequent than in settled communities.

Our strategy seeks to increase the safety of Travellers experiencing domestic and sexual violence and hold perpetrators to account, decrease social tolerance of domestic and sexual violence amongst Traveller communities, and increase healthy relationships amongst Travellers.

To do this we need to work with staff and communities to improve awareness and education about domestic and sexual violence, the criminal penalties associated with it and the support services available with Traveller communities and service providers.

Action Plan Summary

Strategic Outcome 2: Improve health, safety and wellbeing

Strategic Action	Target	Current Position	Lead Partner
Goal 6 Improve access to health and other support services for Travellers in the city			
Conduct specific needs assessment on the health and wellbeing of Travellers	November 2012	To be planned	Public Health & NHS Sussex
Develop an action plan in response the findings of the needs assessment in order to improve access to healthcare services for members of the G&T Community	March 2013	To be planned	Clinical Commissioning Group
Citywide review of Health Visitors to include the impact on the Travelling community	2012/14	Local implementation group set up	NHS Sussex & Brighton & Hove City Council
Goal 7 To improve cultural awareness in health services			
Cultural awareness training for CCG staff and lead clinicians	Nov 2012	To be planned	CCG & NHS Sussex
Goal 8 To improve ethnic monitoring in health and other services to include Travellers			
The Trust will ensure that all service providers are aware of the monitoring framework and use it to monitor service uptake and experience in order to identify key issues for Traveller communities	Ongoing – to be reviewed as part of needs assessment	NHS Brighton and Hove has already been using and promoting the monitoring framework	NHS Brighton & Hove

Strategic Action	Target	Current Position	Lead Partner
Goal 9 Tackle domestic and sexual violence			
Integrate actions to address domestic and sexual violence in Traveller communities into DV and SV Action Plans and in the Violence Against Women & Girls Strategy	Plan in place April 2012	DV JSNA, outcomes & commissioning priorities 2011–14 completed. Annual action plan 2012/13 in progress	Safe in the City Partnership
Develop a package of support for Travellers subject to the overall needs within the DV Commissioning Plan, SV Action Plan and the Violence Against Women & Girls Strategy	To be developed in 2012/13	To involve Traveller women and in line with national standards, for DV & SV work	Safe in the City Partnership working with other organisations
Integrate work of Traveller Education Team (Goal 13) with Healthy Schools Team work on gender equality / domestic and sexual violence prevention	2012/13. Integration of awareness and education work. Clear pathways to services for young people for Traveller children needing support	DV / SV whole school approach being developed in 2012	BHCC Healthy Schools Team

11. Strategic Outcome 3: Improve education outcomes

*“Schools have helped a lot – children on sites get Christmas cards at school from members of the settled community.”
(Traveller)*

11.1 Giving children a good start in life

National studies⁴⁶ have identified strong barriers to education encountered by Traveller pupils including:

- enforced mobility and interrupted learning
- the limited relevance of the curriculum for some pupils
- cultural barriers
- teachers' low expectations

We want to work with Travellers to help embed the value of education throughout the family and make sure that children and young people from Travelling communities are able to access suitable education and training that enables them to attain educational standards that raises economic and employment opportunity.

We also recognise the value in learning and adopting successful good practice from elsewhere and will seek to draw in members of the Travelling community wherever possible to support training and outreach.

Again, the success of this objective is heavily dependent on *Objective 1: Improve site availability* which will help Travelling communities, schools and other professionals build the trust and relationships essential for an effective education. Our strategic goals under this priority are to:

- Goal 10** Raise standards by ensuring successful education provision for Traveller children
- Goal 11** Raise the engagement with learning opportunities for all traveller families visiting Brighton and Hove
- Goal 12** Secure engagement of families from the early years
- Goal 13** Improve further the awareness in schools about Traveller History and Culture

⁴⁶ 'Inequalities Experienced by Gypsy and Traveller Communities: A Review', EHRC, 2009

11.2 Goal 10: Raise standards by ensuring successful education provision for Traveller children

It will be important for the local schools to be ready to welcome the new arrivals and for the teachers to be confident that they can make an interesting and relevant curriculum. We will provide support for the schools that will be part of this.

11.3 Goal 11: Raise the engagement with learning opportunities for all traveller families visiting Brighton and Hove

We know that a good education is a strong protective factor and so we aim to bring all into contact with education services either through a school placement. Our team aims to visit all families that arrive in the city and work with them to plan a programme of learning.

11.4 Goal 12: Secure engagement of families from the early years

The gap in performance starts at a very early age so we will aim to provide support through multi agency teams to engage families with young children with appropriate learning opportunities.

11.5 Goal 13: Improve further the awareness in schools about Traveller History and Culture

The Traveller Education Team has produces resources to raise awareness and the best practice in the city shows that where there the culture is celebrated, children feel welcomed and able to learn.

*“Get Traveller parents to visit schools to speak about how they live, get their children to attend schools as well - and maybe visit encampments to see how the other half live - this might benefit both sides of the community.”
(Resident)*

Action Plan Summary

Strategic Outcome 3: Improve education outcomes

Strategic Action	Target	Current Position	Lead Partner
Goal 10	Raise standards by ensuring successful education provision for Traveller children		
New families are visited by Outreach Team to engage with families, assess need according to age and arrange admission into local school	1) All pre school children are engaged 2) All school aged children enrolled in local provision	1) In hand 2) Many secondary aged children not currently engaged	Traveller Education Team
Children are supported into new school by peripatetic teacher	Successful admission and inclusion into new school	Ongoing	Traveller Education Team
Home school liaison provided by outreach team and Education Welfare Service to ensure good attendance	All children in school with attendance over 90%	Attendance approx 85% (2010-11)	Traveller Education Team & Education Welfare Service
Support provided to local school and their communities closest to new site via 1) training re cultural awareness and successful practice in integrating Traveller children 2) additional teaching support to Traveller children with learning deficit	1) All receiving schools cultural awareness training and educational resources 2) New Traveller children settled in schools and support plans in place where necessary	Awaiting new site development	Traveller Education Team
Collaborate with voluntary sector and families to provide/access out of school activities	New children integrating into local community	Childrens' centre / family learning in hand	Youth Service, Traveller Education Team, Traveller Organisations

Strategic Action	Target	Current Position	Lead Partner
Goal 11 Raise the engagement with learning opportunities for all traveller families visiting Brighton and Hove			
To continue to provide a specialist/outreach provision to support all Traveller families to access learning opportunities	Increase uptake in local provision including family learning	Specialist / outreach in place	Traveller Education Team
To provide additional teaching support for those with learning deficit (due to mobility)	Improvement in attainment - Foundation Stage, KS2 and 4	Peripatetic teachers assess before or day 1 of enrolment	Traveller Education Team & Schools
To offer alternative education provision where required for 14-19 secondary aged pupils	Improved uptake of educational opportunities	Available but poor uptake due to mobility	Traveller Education Team & Engagement Team
Involve Traveller groups in education services development	Consult with local Travellers	In hand	Traveller Education Team & Schools/Nurseries
Goal 12 Secure engagement of families from the early years			
To deliver weekly outreach under 5s play sessions to all families using the Traveller education team playbus in partnership with health and other professionals.	To engage all newly arrived families with mainstream services. eg children centres, early years settings and specialist services eg speech and language therapists	Ongoing	Traveller Education Team & Health visitors
To provide a parent and under 5s drop-in group for Traveller parents on site	Attendance and participation in the bespoke group within Children's Centre and to increase participation and inclusion in wider children centre activities	Ongoing	Early Years Coordinator Traveller Education Team Moulsecomb Children's Centre

Strategic Action	Target	Current Position	Lead Partner
Involve Traveller groups in education services development	Improve participation and uptake of 2 yr old nursery funding	Families consulted about these actions	Health Visitors, Early Years Coordinator, Traveller Education Team
To provide training to early years settings, children's centres, school staff re good practice in working with GRT families as both bespoke and part of LEAs training programme	Increased skills and confidence of EYs staff in working with GRT families – result increase in uptake of mainstream provision	Ongoing	Traveller Education Team
To arrange nursery places when necessary to newly arrived families and support child into nursery, to provide teaching support to children with an identified need	Increased uptake of Early Years Educational Entitlement (EYEE)	Work commenced	Traveller Education Team
Goal 13 Improve further the awareness in schools about Traveller History and Culture			
Offer cultural awareness training to all educational establishments and to embed this in LEAs rolling training programme	Uptake of training	Ongoing	Traveller Education Team, Healthy Schools Team
Promote national initiatives such as Gypsy Roma Traveller History Month and encourage schools to participate	Schools participation in GRT History Month	Working with partners on June 2012 GRT History month	Traveller Education Team, Partnered with Traveller Organisations
Involve Traveller groups in education services development of cultural awareness and equalities training	Travellers Participation in training	To be addressed	Traveller Education Team, Partnered with Traveller Organisations and individuals
Continue to contribute to schools curriculum diversity by providing lesson models, resources and artefacts.	Culturally reflective curriculum in schools with Traveller children on roll	Ongoing	Traveller Education Team, Healthy Schools Team
Information for schools updated and available via website	Schools have accessible resources	In need of updating	Traveller Education Team

12. Strategic Outcome 4: Improve community cohesion

12.1 Supporting our communities

If we are successful in achieving *Objective 1: Improve site availability* this will have an immediate impact on community cohesion by minimising the unauthorised encampments that inflame community tensions.

Both Travelling and settled communities would like to see an end to unauthorised encampments but unfortunately until there are more stopping places for Travellers then unauthorised encampments will continue to impact on the lives of both the Travelling and settled communities.

However, effective community cohesion is about more than unauthorised encampments, it is about helping the city's diverse communities understand one another to get past the common myths, prejudices and stereotypes and to ensure that all those who have a stake in the city are able to get involved in decisions about the services that affect them. Local media has a key role to play in helping to build stronger communities.

To reduce fear of crime, domestic and sexual violence, anti-social behaviour, racism, sexism and homophobia and ensure community cohesion is improved across communities our goals under this priority are to:

- Goal 14 Increase awareness of different cultures
- Goal 15 Involve Travellers and their advocates in service design and delivery
- Goal 16 Effectively manage unauthorised encampments
- Goal 17 Ensure sensitive sites are protected
- Goal 18 Tackle crime, anti-social behaviour and nuisance
- Goal 19 Tackle racism, sexism and homophobia
- Goal 20 Develop a protocol for addressing Van Dwellers who are often mistaken for Travellers

“Things have improved for us with the settled community. Our children go to school and we have got to know other mum’s and the local community – they realise not all Travellers are the same. People in the local shops know us and in the hairdressers. Everyone at the school knows we are Travellers; we go to lunch with people and to people’s houses.”
(Traveller)

12.2 Goal 14: Increase awareness of different cultures

It is very evident from the portrayal of Travellers in the media, general comments and some of the responses to the consultation that many residents are unaware of Traveller culture and history. Equally, the travelling communities have little understanding of the many cultures and ways of life of our settled communities.

This lack of understanding fuels myths, speculation and stereotypical points of view that increase tension and mistrust between the communities.

Over the lifetime of the strategy we would like to raise awareness of the Traveller culture and way of life and also the settled community to help all those living in and visiting the city understand one another. We will look at the potential to build community relations through schools, libraries, museums, staff training and community events.

“Unless the local media is included and on board it will be much harder to succeed.” (Resident)

12.3 Goal 15: Involve Travellers and their advocates in service design and delivery

We know that the most effective services are those that involve communities and service users in their design and delivery. This is particularly important in respect of services for Travellers who may have a long history of confrontation, racism and other bad experiences with service providers.

Particularly successful services go further and actively encourage members of the Traveller community to apply for roles where their specialist background and understanding can be particularly helpful in building trust and helping members of their community access the support they need.

For example, the NHS in East Sussex has recruited a Health Trainer from the Traveller community who is working across the region’s Traveller sites to raise awareness of health matters and help people make positive changes that can make a real difference to their health.

During the life of this strategy we want to encourage the involvement of Travellers and their advocates in as many services as possible such as the development of the new Traveller site. To support this we are setting up a Brighton & Hove Traveller Forum to bring together local Travellers and those who regularly visit with service providers and the community and voluntary sector to discuss and resolve local issues.

In addition, the public sector is a major employer across Sussex and has the potential to work with the Community & Voluntary Sector to support Travellers into training and employment. A number of opportunities will be explored during the lifetime of the strategy both locally through the City Employment & Skills Plan and internationally looking at European Funding aimed at Traveller groups.

Once the permanent site is delivered this will help us develop a more targeted approach with longer term Traveller residents.

12.4 Goal 16: Effectively manage unauthorised encampments

Whilst we can not eliminate the risk of unauthorised encampments or move them on as quick as some would hope as there are few alternatives, we need to ensure that those encampments we have in the city are managed effectively so that they do not impact negatively on the settled community.

Where Travellers park on public land, the Police and Traveller Liaison Service make joint visits to carry out a Community Impact Assessment of the encampment upon the local area (community use of the site, biodiversity, historic significance etc) and carry out welfare checks with the Travellers.

The availability of alternative authorised stopping places in the city and the levels of community or site impact and welfare needs determine how quick an encampment can be moved.

*“Involve and engage travellers in shaping and running services and offer them the same commitment and level of support which would be shown to any other minority or interest group in the City.”
(Resident)*

Sussex Police has developed a **Code of Conduct on Unauthorised Encampments** for Traveller communities that are the same standards of behaviour expected of the settled community. The Council has also published a **Guide for Travellers** leaflet explaining what will happen in the event of an unauthorised encampment. The Council and Police are looking at developing joint leaflets to help ensure there is a consistent approach.

It is very important to us that we communicate effectively with any settled community affected by an unauthorised encampment. We do this in a number of ways and are looking to improve this in response to the strategy and resident needs:

- We engage with staff working within the Stronger Communities Partnership that are supporting active community engagement to provide information about Traveller lifestyles, and the likely impact of an encampment on the locality
- We build positive relationships between the Traveller Liaison Team and chairs of Local Action Teams by notifying them the moment there is an encampment in their community and ensuring they receive regular updates
- We have a webpage that is regularly updated with information about unauthorised encampments within the city. This webpage can be found at: <http://www.brighton-hove.gov.uk/travellers>
- The Traveller Advice Line will be integrated into our customer contact centre to improve our telephone response to resident and Traveller enquiries
- We will look at good practice from other parts of the country to see what other improvements can be made to the way we work and communicate with residents

Traveller Scrutiny Panel Evidence Good Practice from Fenland District Council

Fenland District Council has done a lot of work on unauthorised encampments. They worked to minimise the environmental impact and to get people to realise that although they had a right to move around, they needed to respect others: it is a 2 way process. Normal refuse services were delivered once a week and Travellers were expected to store their rubbish ready for collection in a neat and tidy way.

Additionally, FDC work to make sure the settled community are aware of the Travellers' co-operation. Central to this is working with the local media such as the Cambridge Times. In the past, stories about encampments would have been on the front page but now the Editor will contact staff to find out more about new encampments, such as how long they are staying and prints a more balanced story further in the paper. This ongoing dialogue has worked well.

In recognition of the cross-border nature of Traveller issues we have recently set up the Sussex Joint Local Authority Traveller Forum in partnership with neighbouring authorities and Sussex Police. This forum will help us share good practice and improve our services and is working on a joint Sussex Wide Unauthorised Encampment Protocol.

12.5 Goal 17: Ensure sensitive sites are protected

Preventing unlawful trespass to sensitive or high profile sites avoids a wide range of issues caused by many groups in society and is not confined to Travellers such as illegal raves, fly tipping and unauthorised encampment. Aside from preventing problems before they occur, site protection has an important role to play in reducing tensions between the settled resident communities and Traveller communities.

The council must review matters on a case by case basis through an impact assessment to determine what measures will work in that location and the potential impact on other areas if the problem is simply moved elsewhere.

*“Consult people on what are sensitive sites - come up with a list of the type of things that might qualify a site as sensitive. Make it very clear on the boundaries of any sensitive site that there will be no [toleration] of unauthorised encampments.”
(Resident)*

The more sensitive a site the more likely protective measures should be in place, for instance sites of Special Scientific Interest, high usage parks and so on.

As funding is limited and site protection is very costly, damaging and unsightly, the Council is mindful that if we are to be successful we must select and prioritise the most important or sensitive sites for action. This would mean coming to an agreement of what sites we wish to prioritise and accepting that this increases the risk of trespass in other areas. We must be realistic and recognise that whilst land protection is a deterrent, it is not likely to prevent someone who is determined.

12.6 Goal 18: Tackle crime, anti-social behaviour and nuisance

Whilst most Travellers respect local residents and the land, as with all communities there is a minority of Travellers that cause anti-social behaviour, nuisance, fly-tipping and crime.

The Police launched Operation Monza in the summer of 2011 which saw officers visiting the city's unauthorised encampment on a daily basis to help build trust and improve relations with the Travelling communities and also to reassure local residents. In addition, a Code of Conduct was developed that outlines the standards of behaviour expected on both the Travelling and settled communities.

As a result of Operation Monza, no sites needed evicting due to anti-social behaviour, crime or nuisance and we hope that this type of proactive initiative can continue in future.

12.7 Goal 19: Tackle racism, sexism and homophobia

Unfortunately, even though the City prides itself on its tolerance, racism towards Travellers is still common despite being illegal under the Race Relations Act 1976 (as amended). Romany Gypsies, Irish and Scottish Travellers are recognised in law as ethnic groups and are identified as having a shared culture, language and beliefs protected under the Equality Act 2010.

Ignorance and lack of awareness are often the main basis for prejudice. Promoting understanding and challenging behaviour such as the use of racist language is part of the way that attitudes and behaviour can be challenged.

To help tackle hate crime we want to increase understanding amongst communities but we also recognise that sometimes this goes beyond a lack of cultural awareness and has to be tackled in a more robust manner with the full force of the law.

Community safety services develop the most effective ways in which we can deal with specific hate crimes, provide protection to victims and help bring perpetrators to justice. The community led Racial Harassment Forum is one way in which we achieve this and we will ensure that the needs of the Traveller community are fully heard at that Forum. We are also developing new ways in which we can encourage reporting of incidents to our casework team and we will also ensure those arrangements are taken out to the Traveller community.

*“Feel it’s only
individuals who
discriminate –
there’s good and
bad in any
community.”
(Traveller)*

12.8 Goal 20: Develop a protocol for addressing Van Dwellers who are often mistaken for New Travellers

Brighton & Hove has a population locally termed as Van Dwellers. Van Dwellers are generally found living in their vehicles on the roadside or on unauthorised encampments and are generally not nomadic. As they are effectively permanently resident in the city, such as through work or education they are not considered to meet the definition of a Traveller in any national or regional policy.

This distinction between New Travellers and Van Dwellers is difficult and often not recognised by local people who experience lived-in vehicles parked outside their homes, often for many days, which can further inflame tensions against Travellers. As lived-in vehicles are recognised as an issue for the city, we will develop a protocol to address this during 2012/13.

Action Plan Summary

Strategic Outcome 4: Improve community cohesion

Strategic Action	Target	Current Position	Lead Partner
Goal 14 Increasing awareness of different cultures			
Develop a greater understanding amongst the media of Traveller issues	Ongoing work	Approaches being made to local media	Brighton & Hove City Council
Improve further the awareness in schools about Traveller History and Culture	Various (see Goal 12)	Various (see Goal 12)	Traveller Education Team, and Traveller Orgs.
BHCC Promotion of GRT History Month	June - annually	Initial discussions in progress	BHCC Communities & Equality Team
Traveller staff – workforce monitoring and action/support from BME Workers Forum	Various as part of People Strategy and Implementation plan	Initial discussions in progress	Brighton & Hove City Council
Improve Community Development Workers / Local Action Teams	July 2012 and ongoing	Work being planned	BHCC, Friends Families & Travellers
Goal 15 Involve Travellers and their advocates in service design and delivery			
Set up a Brighton & Hove Traveller Forum	First meeting by July 2012	Early discussions with Traveller groups	Brighton & Hove City Council
Progress opportunities for supporting Travellers into work and learning	To be determined	Potential European being explored and links to Employment & Skills Plan	Brighton & Hove City Council
Involve Travellers in development and design of permanent site	Throughout 2012-2013	Preferred site identified	Brighton & Hove City Council
Consult on procedures for Tolerated sites	Spring 2012	Initial scoping in progress	Brighton & Hove City Council
Involve Travellers in service development, cultural awareness, equalities training	Travellers participating in training	Building upon previous successes	Traveller Education Team, Schools/Nurseries, Traveller Orgs.

Strategic Action	Target	Current Position	Lead Partner
Goal 16	Effective management of unauthorised encampments		
To review and update the Operation Monza Tactical Plan	Annual review according to operational need	Successful operation in 2011 saw marked reduction in complaints, nuisance and anti-social behaviour	Sussex Police
To provide a dedicated full time Traveller Liaison Officer	Full time officer in post	Officers in post and part of Sussex wide network	Sussex Police
Ensure Section 61 and Section 62A CJ&POA 1994 applications comply with guidance	As far as possible all applications are to be considered by local Commanders to ensure consistency	National guidance in place. Local guidance in development	Sussex Police
Provide a consistent response to all unauthorised encampments	Develop a joint Sussex Wide Unauthorised Encampment Protocol (Police & Local Authorities)	Discussions in progress about joint leaflets and protocol	Sussex Police, Brighton & Hove City Council, East & West Sussex councils
Pro-actively liaise with any settled community affected by an encampment	Ongoing	Community engagement through a range of expanding mechanisms	Brighton & Hove City Council
Expand Operation Monza into a joint approach	Council Traveller Liaison Officer to accompany Police on daily visits to sites	Discussions in progress about joint visits to encampments	Sussex Police & Brighton & Hove City Council
Provide necessary support the those residing on an unauthorised encampment	Ongoing	Work already in progress	Brighton & Hove City Council
Take appropriate action to move on an encampment based on community impact and Traveller needs	Ongoing	Consideration of environmental impact, community impact, Traveller welfare needs	Brighton & Hove City Council
Work across the region to share good practice	To work through the new Sussex Joint Local Authority Traveller Forum	Sussex Joint Local Authority Traveller Forum set up	Brighton & Hove City Council

Strategic Action	Target	Current Position	Lead Partner
Goal 17 Ensure sensitive sites are protected			
Develop a corporate proactive approach to the protection of sensitive sites within available resources	To be developed during 2012/13	Early discussions in progress	Brighton & Hove City Council
Assess sites on an ongoing basis in response to unauthorised use	Ongoing monitoring of sites	Successful works carried out to Withdean Park, Greanleas Recreation Ground and the Ladies Mile Nature Reserve	Brighton & Hove City Council
Goal 18 Tackling crime, anti-social behaviour and nuisance			
To review and update the Operation Monza Tactical Plan	Annual review according to operational need	Successful operation in 2011 saw marked reduction in complaints, nuisance and anti-social behaviour	Sussex Police
To provide a dedicated full time Traveller Liaison Officer	Full time officer in post	Officers in post and part of Sussex wide network	Sussex Police
Provide a prompt, efficient and sustainable waste collection service that tackles fly-tipping	New contract to start August 2012	Approval granted to procure contract	Brighton & Hove City Council

Strategic Action	Target	Current Position	Lead Partner
Goal 19 Tackling racism, sexism and homophobia			
Developing new ways to encourage the reporting of crimes and incidents will be taken forward by community safety services and included within a work programme to develop community based reporting centres throughout the city for hate crimes.	Work to be undertaken during 2012 and will be completed by March 2013.	Work commences April 2012	Joint Community Safety Delivery Unit
Goal 20 Develop a protocol for addressing Van Dwellers who are often mistaken for Travellers			
Develop protocol, Equality Impact Assess, consult, launch	To be developed in 2012/13	Work is yet to commence	Brighton & Hove City Council

Appendix 1: Equality Impact Assessment

An Equality Impact Assessment (EIA) has been carried out as part of the development of the Traveller Commissioning Strategy. The assessment looked at the equalities issues affecting both the Traveller and settled communities in relation to Traveller issues and makes recommendations as to how these can be mitigated through our strategy.

This Equality Impact Assessment is a two stage process. The initial assessment considered the main issues affecting our communities to help shape the outcomes and goals of the draft strategy. The second was developed alongside the consultation on the draft strategy to identify recommendations to minimise any potential negative impacts that may arise from the goals of the strategy that could affect Traveller or settled communities.

Travellers are known to suffer high levels of discrimination, racism, deprivation and a lack of access to culturally appropriate services. They are also known to have some of the worst health outcomes, lowest life expectancy and poor educational attainment. Much of this disadvantage and inequality is attributed to a lack of secure stopping places for Travellers with frequent evictions forcing moves making it difficult for them to access services that the settled communities may take for granted such as GPs, dentists and schools.

The primary impact on settled communities have stemmed from unauthorised encampments causing a loss of recreation space in local communities with associated anti-social behaviour such as fly-tipping or other nuisance.

The national shortage of stopping places for Travellers is recognised by Government to cause unauthorised encampments which can put Travellers in conflict with the settled community and often attract negative media interest.

The strategy is based on sound research using extensive consultation with local communities (both settled and Traveller) which shaped the final goals. The Strategic Outcomes linked to improving site stability, health and welfare outcomes, education outcomes and community cohesion cover the main identified inequalities and no fundamental negative impacts from these outcomes have been identified.

With tackling Traveller inequality being heavily dependent on the provision of secure stopping places to facilitate access to services, the shortage of suitable land in the city could pose a problem in identifying suitable locations for these.

Brighton & Hove is a city with many pressing and competing land needs, particularly in respect of infrastructure and new housing. The demand for stopping places and needs of Traveller communities must be seen and addressed alongside the wider context of the needs of the city as a whole.

In tackling inequality the strategy must strengthen the links between the Travelling communities, settled communities and our strategic partners such as the Police and health services to ensure that achievement of the objectives and goals remains an ongoing exercise during the lifespan of this strategy and beyond. This will be necessary to achieve inclusive services accessible to the Traveller community without compromising the concerns and the good will of the settled community.

Housing Strategy Team

Brighton & Hove City Council,
2nd Floor Bartholomew House,
Bartholomew Square, Brighton BN1 1JE

e: housing.strategy@brighton-hove.gov.uk
w: www.brighton-hove.gov.uk/housingstrategy



**Brighton & Hove
City Council**

London Housing Committee response

Geraldine Lindsay
Accommodation advice LGTU
24th September 2014

I have worked with Gypsies and Travellers living on official sites, unauthorised encampments and in bricks and mortar over the past 13 years.

During this period I have observed the difficulties and comparisons that Gypsies & Travellers living in bricks and mortar face in relation to those living on official sites.

Gypsies & Travellers living on sites appear to be more able to deal with their own affairs and everyday scenarios more effectively than Gypsies & Travellers living in bricks and mortar.

Those living in a house or flat will experience problems such as Isolation, harassment from their neighbours and struggle to retain their culture/traditions.

Gypsies & Travellers who are homeless and approach their local authority for assistance are often placed in emergency accommodation such as hostels and bed and breakfast accommodation. This particular type of accommodation can prove unsuitable for those who have large families. Hostels are felt to be unsafe, shared facilities are alien to this community and they have very little patience with the amount of time they are expected to spend in these types of accommodation. They have problems with the rules of regular registration which often results in the accommodation being terminated then they are deemed as making themselves intentionally homeless.

Gypsies & Travellers living in houses often find themselves caught up in the eviction process, due to non completion of relevant forms on time, affected by the bedroom tax and difficulty understanding the terms of their tenancy.

When this happens Gypsies & Travellers are forced to rent through the private rented sector. This type of accommodation is a problem due to the reluctance of landlords to let properties to Gypsies & Travellers, large deposits and guarantors. Sometimes the reluctance to let to Travellers is just an extension of not letting to anybody on housing benefit. Gypsies and Travellers living in private rented accommodation may also be lost by the support services that exist such as specialist health visitors.

In my experience I have seen a tendency, particularly amongst young Gypsies & Travellers to be less settled in housing than those on sites. It is not uncommon for young Gypsies & Travellers with permanent accommodation to find it difficult to live there and allow other families to move in while they go off travelling, or squat on sites.

Another issue I see that tends to happen to members of the community living in houses is quite often as soon as neighbours find out that they are Gypsies &

Travellers they contact the local authority to complain. They keep lists of visitors, take registration numbers and complain about their children.

The main barrier that Gypsies & Travellers living in houses experience, is, unless they have links with families living on sites they become estranged and isolated from their community.

Sub-005

Housing Committee
London Assembly
City Hall
The Queen's Walk
SE1 2AA

Tracie Giles
8 Parkway Crescent
Leyton Road
Stratford
E15 1AB

I'm a Romany Gypsy living in Newham on the only Local Authority site and I'm writing in response to the Housing Committee investigation call for evidence.

1. How are you meeting the Duty to Cooperate with neighbouring authorities?

I'm aware that the LLDC who is adjoining planning authority to Newham recently did a Gypsy and Traveller needs assessment to support their local plan. The site I live on in Newham is right on the border of the LLDC and was built as a relocation of the site at Clay's Lane where we lived for over 30 years before the Olympic Games. We were promised that we would be moved back into the Olympic Park after 2012 and the Mayor and LDA made a commitment to do this. However after the LLDC was formed and inherited these responsibilities, they could only find one site which the residents found unsuitable and then they dropped the commitment altogether. Now the LLDC have a pitch target in their Local Plan but when they did the needs assessment to get this figure of need they didn't come to our site to interview the residents. They only phoned someone from Newham council who told them we are happy where we are. This isn't true, our site is in very poor condition and people have hoped for many years that we can move to a site that was as good as Clay's Lane, because that's what we were told we will get.

I believe the LLDC hasn't met the Duty to Cooperate with Newham, although they have included in their plan a target to meet some of Hackney's need for pitches, as one of the Hackney sites is within the LLDC boundary. This isn't a fair approach and there should be better guidance on how to meet this duty. In particular, since the LLDC is the Mayor's development corporation, he should show better leadership on this issue.

2. Do you see a value in a revised pan-London or sub-regional GTANA commissioned by the GLA? How else might the Mayor support the housing needs assessment of Gypsies and Travellers?

There should be a London wide GTANA to support a better policy for Gypsy and Traveller sites in the London Plan. I was involved in the consultations and EiP of the London Plan in 2009 and 2010, and in the London GTANA in 2007-2008. We were very disappointed when the pitch target was dropped from the London Plan and since then nothing has been built in London to meet the needs identified in the study. This was a waste of money, as the councils

didn't take the needs assessment on board and deliver the pitches they needed. Now many of them are doing new studies but it won't be sure that they actually provide anything. In my view the policy in the London Plan must state what the pitch target is and support councils to find land for new provision. Otherwise councils will never do this on their own. The Mayor has to make it a strategic issue and put pressure on the boroughs to deliver sites, like he is doing for general housing.

3. What would be the best way to assess the current and future housing need of the Gypsy and Traveller community?

The Needs assessment should be reviewed more frequently, as families are growing. It shouldn't be done over just one site visit, people should be announced in advance and have the opportunity to be interviewed. Gypsies and Travellers in housing must also be counted, as many of them have been on waiting lists for sites for decades. The GTANA should be done through consultation with the community, should be explained properly and be sensitive to people's situations in terms of what questions are asked and how the interviews are carried out.

4. Have you been involved in the site allocation process? Could Gypsy and Traveller engagement with the process be improved and if so, how?

Me and other residents of the Parkway Crescent site were involved in looking for land for the relocation of our site to make room for the Olympic Games. We went and identified suitable land in Redbridge and another borough, while Newham council couldn't find anything. But these boroughs didn't want to have a Traveller site, so the options were dropped. Newham came up with a piece of land at Jenkins Lane in Barking, which was underneath two motorways and was used as an overspill car park. We fought really hard for that to be removed from the options because it was really unsuitable for families. The LDA came up with the proposal for a site at Chobham Farm. There were issues regarding the Channel Rail Link Tunnel and ownership, but still people were consulted on designs over a long time. Then a piece of land was found at Major Rd, but we objected to the planning application because we were unhappy with this site which was open space and a children's playground. However this didn't matter in the end, because the LDA and Newham were running out of time so they decided to go ahead with the Major Road site. They started to build in June and we moved in October and the site still wasn't completely built. The site design that was used was the one originally done for Chobham Farm and didn't work on Parkway Crescent. This process was very frustrating, there was poor communication between LDA, Newham and the residents which made the relocation very difficult. To improve the process in general there should be more transparency and fairness, and political will because most times a Traveller site is a political decision instead of a purely planning one. Most times Gypsies and Travellers don't understand what is going to happen to them and their hopes are being slashed.

5. What happens to members of the community who cannot get a pitch?

When people can't get a pitch they double up with family on the sites they grew up on or they go into bricks and mortar. On Parkway Crescent about half of site is doubled up. In other places sites can get very overcrowded and this causes problems with the council and neighbours who don't understand that people need to live together with their families.

6. How should local authorities engage with Gypsies and Travellers living by the roadside?

I have recently read about a good case study in Swindon, where the council worked with the police and community and created a temporary site for a few days during a funeral attended by around 500 people. The key to mitigate conflicts is good communication and for councils to have good relationships with authorised sites as well. People need access to health and education while they're on unauthorised camps. Before I settled on the public authority site in Newham I used to move around with my family, especially in London and would get health visitors to see if kids vaccinated, look after pregnant women, Traveller education officers would come see what the children's needs are. Nowadays our society is much more advanced in terms of technology and Human Rights but these things don't happen anymore and it feels like the Traveller community doesn't benefit from this progress.

Gypsy and Traveller site provision in London

This response to a call for evidence is made by a volunteer with the Kensington and Chelsea Social Council (KCSC) enabling Irish Traveller families on Stable Way. From 2010 – 2014 I was employed by the Westway Trust, to research the 'unmet learning, accommodation and health needs and opportunities of families on Stable Way. From 2008-2010 I was employed by the Irish Traveller Movement in Britain, as part of a London Councils funded project to influence policy and increase the voice and participation of Gypsies, Irish Travellers and Roma in the decisions about the development of new accommodation provision in London. The last six years has provided an opportunity to view how the capital has responded in policy and practice to a clearly identified need for more sites.

The response is supported by the Stable Way Residents Association.

Our response addresses a number of the investigation topics, organised around a few main themes as follows. It has a focus on the Royal Borough of Kensington and Chelsea (RBKC).

The location of Stable Way is both ideal and a challenge. Close to a primary school, college, doctors, shopping amenities and sports centre, in some ways it could have come out of the government guidelines for good practice. However all this is over shadowed by the Westway flyover and the 24/7 traffic travelling overhead. Surrounded by garages and workshops, there is no pavement along the road leading to it. Mothers have to push prams along a bendy and pitted approach lane.

RBKCSs Strategic Response

The response by Royal Borough of Kensington and Chelsea has been poor, with no new sited accommodation provided since officially adopting Fordhams figures in their Core Strategy, 2010. Those figures called for 6 new pitches by 2012 and a further 6 by 2017. Indeed the RBKC strategic approach has been more to move families from Stable Way into wider housing options rather than develop more appropriate site accommodation. The Action Plan accompanying the 2010 Core Strategy had two priorities:

- Strategic Priority 1: Improve the physical living conditions of the people on the Stable Way site**
- Strategic Priority 2: Promote and improve access to wider housing options for the GRT Community.**

In working towards these priorities RBKC has made some progress. In 2010 a minor site refurbishment was carried out. Funded by £240k worth of monies from Hammersmith and Fulham (HF) and RBKC the refurbishment provided for some site signage, an information board, new mailboxes, flower beds at the beginning of the site, electrical re-wiring and fencing.

Strategic Priority 2 does seem to fly in the face of further pitch development and perhaps is contrary to the Councils Public Sector Equality Duty. Specifically there is no evidence that both HF and RBKC are '[t]aking steps to meet the needs of people from protected groups where these are different from the needs of other people.' In aiming to house the families from Stable Way, the policy is effectively not protecting a cultural imperative of sited Irish Traveller families.

The Royal Boroughs Housing Strategy 2013 -17 reference to Gypsy and Traveller community describes:

'As with all communities living in the borough, the Council is committed to providing a safe, secure and desirable environment for the gypsies and travellers living at the Stable Way site, in north Kensington. This site is jointly provided by the Royal Borough and the London Borough of Hammersmith and Fulham. We recognise that a good quality, well managed site plays an important part in achieving better social, health and educational outcomes for the whole community. We have developed a Gypsy and Travellers' plan with a series of actions with the full involvement of the community. This sets out how the Council is going to deliver services to this community.

The Supporting People programme funds a floating support service on the Stable Way site that works with the local community to deliver targeted services that both empower the community and increase their access to a range of housing, health and social care services.'

This review of the Housing Chapter of the Core Strategy initially suggested a decrease from twelve new pitches to two. There was no consultation with residents in deciding this new figure and residents were informed a desk-based needs assessment had been conducted.

Further, this Housing Strategy talks of an agreed plan of action with the community. The practice was very different. Indeed residents had to seek Councilor support before they even saw the action plan produced by RBKC.

The process of consultation over these matters is something that RBKC struggle with and often decisions are presented as *fait accompli*. There was an Inter-Agency Forum that involved Council officers/Councilors, voluntary groups and individuals and residents from Stable Way. Whilst sometimes challenging this was a progressive forum, that encouraged a real dialogue. That Forum has been suspended by RBKC without reason as to why.

Gypsy and Traveller Accommodation Needs Assessments

In what regards the Duty to Co-operate on assessing the needs of Gypsies and Travellers, the lack of standardised practice and guidance on this issue makes it easier for local authorities to justify the failure to collaborate. HF and RBKC are however conducting a joint GTANA, which is possibly the only example of cross Borough collaboration in London.

Despite warning in May 2012 by the sites Ward Councilor that the Needs Assessment was already behind schedule, RBKC has been slow in delivering this. In order for RBKC to fulfill their duty and conduct a GTANA the residents and supporting organisations had to lobby the Council extensively. As mentioned above, initially the accommodation need was determined solely by RBKC as a desk based piece of work. This was rejected by residents.

In early 2014 a short report on an assessment into the accommodation, learning and health needs of families on Stable Way was conducted by Westway Trust showed a need from Stable Way of the development of between 9 and 10 new pitches to meet existing need.

It is only now towards the end of 2014 that RBKC and HF are delivering their needs assessment which is planned to be completed by early 2015. Some three years after it should have been.

With regard to the issue of Gypsy and Traveller Accommodation Needs Assessments we wish to flag up the changes proposed by DCLG to the definition of Travellers for planning purposes and subsequently to the Planning Policy for Traveller Sites and GTANA guidance, which we believe would have extremely negative impacts on the Gypsy and Traveller community. We would urge the Housing Committee to take into consideration all the responses and evidence received as part of this investigation and make recommendations to the Mayor despite the current uncertainties regarding government guidance.

Barriers to securing land for Gypsy and Traveller Sites

The high cost of land in London and specifically in RBKC is a real barrier to developing more sited provision. Residents in the Borough are constantly reminded that there is no land in Kensington and Chelsea and that this is the most expensive land in the Country. This is exacerbated by the fact the Councils are pressured to build high density dwellings and the value for money argument is often drawn out when discussing new site accommodation. It is certainly true that you would get more flats on a piece of land than mobile homes, though again how is this meeting the Councils Public Sector Equality Duty.

A fundamental barrier in RBKC is that there has never been the political will to extend Stable Way or identify new site opportunities. On paper it can appear that there is a commitment though, residents have been firmly told there is no way that Stable Way will be extended. What is required is that local authorities recognize that failure to take seriously their equality duty and to bring about the change required means the Gypsy and Traveller accommodation issue shall remain.

Recommendations

There are some simple solutions in the Borough to meeting the Gypsy and Traveller Accommodation Need.

- Conversations were happening with Westway Trust to explore whether their land at the entrance to Stable Way could be purchased by RBKC to extend the existing site. This is a preferred option for some families on the site who maintain that, as they are already a part of the local community, extending the site would not have the same effect on the wider community as building another site elsewhere.
- Living conditions can be much improved by providing a footpath at the beginning of the Stable Way, improved parking and improving safety from the motorway through sound proofing and some form of net protection.
- Re-establishing the Inter-Agency Forum would help with a real dialogue with Irish Traveller families
- The establishment of site(s) in RBKC, HF and London could reduce the housing benefit costs to the local authority. A high quality mobile home would rent at between £150-£200 / family. There are very few houses in London that families can occupy for such a reasonable cost.

- To ensure a strategic approach to meeting the needs of Gypsies and Travellers, the GLA should commission a Gypsy and Traveller Accommodation Needs Assessment, which should be based on local research and interviews with community members at local level, but with the results collated at a London wide level. This should be used to inform the London Plan and London Housing Strategy in the form of pitch targets.
- The GLA should actively support local authorities to identify land for Gypsy and Traveller sites and prioritise this together with general housing provision.
- The GLA should actively support local authorities in delivering new pitches with the support of the Traveller Pitch Fund, instead of waiting for councils to bid for this funding



The Traveller Movement

Resource for London

356 Holloway Road

London N7 6PA

Tel: 020 7607 2002 Fax: 020 7607 2005

Email: info@travellermovement.org.uk

Web: travellermovement.org.uk

Traveller Movement response to London Assembly Housing Committee investigation into Gypsy and Traveller site provision in London

October 2014

About TM: The Traveller Movement (TM) was established in 1999 and is a leading national policy and voice charity, working to raise the capacity and social inclusion of the Traveller communities in Britain. TM act as a bridge builder bringing the Traveller communities, service providers and policy makers together, stimulating debate and promoting forward-looking strategies to promote increased race equality, civic engagement, inclusion, service provision and community cohesion. For further information about TM visit www.irishtraveller.org.uk

The Traveller Movement (TM) welcomes the opportunity to participate in the London Assembly Housing Committee investigation into Gypsy and Traveller site provision. TM is proud to work in partnership with the Gypsy, Roma and Traveller communities in London, together with service providers and policy makers to better promote social inclusion and community cohesion.

Key Points

- A pan-London strategic approach to the provision of Gypsy and Traveller accommodation is essential to delivering Traveller sites. **TM recommends that the current London Plan be amended to include targets for Traveller pitches alongside the general housing targets for the boroughs.**
- London's 2008 Gypsy Traveller Accommodation Needs Assessment is a robust evidence base that was originally introduced and officially signed off by the Greater London Authority. **TM recommends that the 2008 needs assessment be updated by the GLA and that they build upon the good practice and methodologies developed by Fordham Research's original study.**
- There is little to no evidence of London Boroughs adhering to the duty to cooperate when it comes to planning for and delivering Traveller sites. **TM believe that the London Borough's would be far more likely to implement their duty to cooperate if there was a regional or pan-London strategic approach to guide them.**
- As far as TM are aware only 9 additional pitches have been/or are in the process of being built by London Boroughs since the 2008 GTANA, adding ever greater pressure to the demand for pitches on existing Traveller sites. **TM recommends the Housing Committee raise a matter with the Mayor these unacceptable figures highlighting the acute accommodation crisis facing these communities.**
- Current and historical accommodation insecurity negatively impacts on Gypsies and Travellers physical and mental health. **Effectively addressing accommodation insecurity/provision of sites will have a direct and positive 'knock-on' effect not just on community members health, but on the wider social determinates that impact on their intergenerational health and wellbeing (education, employment etc).**
- TM believe that the DCLG's September 2014 proposals to change current planning guidance and legislation for Traveller sites poses the significant danger of making it even harder for councils to plan for and develop Traveller sites. **Considering the Government's proposals are at an early stage of the consultation process, TM would urge the Housing Committee to focus on the issues in hand and not be too greatly influenced by the uncertainties posed by the Government's proposals.**

1. Barriers to provision of Traveller sites

In London and throughout the UK, many Gypsies and Travellers face discrimination on accommodation issues at the local level. This has led to a severe shortage of authorised Gypsy and Traveller sites which has been widely documented by Gypsy and Traveller organisations, the Department for Communities and Local Government (DCLG) and the Equality and Human Rights Commission (EHRC). In a 2009 research report on the lack of provision of Gypsy and Traveller sites, the EHRC concluded that 'the lack of secure accommodation for nomadic groups remains the lynchpin of a plethora of other inequalities.'¹ DCLG's 2009 *Progress Report on Gypsy and Traveller sites* stated:

*'The current position on site delivery remains unsatisfactory. It is clear that local authorities need to increase the pace at which suitable locations are identified that can be used as Gypsy and Traveller sites.'*²

TM believes there are two key reasons for the huge under-provision of Traveller sites in London:

- Cost of land cost of land, especially since council owned properties are increasingly being sold off. Additionally, the pressure to build more housing and the viability and deliverability tests introduced by the NPPF make the provision of low density, family accommodation such as Gypsy and Traveller sites very difficult.
- Unwilling local authorities, often unduly influenced by hostile local residents, are often the reason why there has been a failure to deliver the required number of sites in London and throughout the UK regions. In a 2009 report, the EHRC highlighted the obstacle preventing site provision as being 'resistance from the sedentary population to the idea of new sites for Gypsies and Travellers.'³

For these reasons TM believe it is essential that planning and provision of Traveller sites in London is a strategic issue and included in the London Plan, alongside 'bricks and mortar' housing. This would ensure a degree of oversight, support and guidance for London Boroughs in adhering to their duties to assess need, plan for and identify suitable locations for Traveller sites

2. Current provision

In 2008, the GLA provided support for the London boroughs to conduct the London Gypsy and Traveller Accommodation Needs Assessment (GTANA). The GTANA found an overall maximum shortfall of 554 new residential pitches in the next five years, which would require doubling the present stock of pitches for the need to be

¹ EHRC, 2009, *Gypsies and Traveller: Simple Solutions for living together*, p.11
http://www.equalityhumanrights.com/uploaded_files/gypsies_and_travellers.pdf

² CLG, 2009, *Progress Report on Gypsy and Traveller Policy*, p.5
<http://www.communities.gov.uk/documents/housing/pdf/1284500>

³ EHRC 2009, *Inequalities Experienced by Gypsy and Traveller Communities, Research Report*,
<http://www.equalityhumanrights.com/key-projects/good-relations/gypsies-and-travellers-simple-solutions-for-living-together/gypsies-and-travellers-research-reports/>

met. The authors explained that this was less than remarkable considering that there had been no new socially rented sites provided to Gypsies and Travellers in the past decade (1998-2008), while there had been a net loss of pitches during the same period.

As far as TM are aware, since the 2008 GTANA there have only been 3 additional new pitches developed in London (Kingston), with 6 more in the process of being built in Hounslow. Considering London has the third highest population of Gypsies and Travellers in England (according to the 2011 ONS Census and TM research)⁴ it is very worrying and completely unacceptable that culturally appropriate accommodation provision for these groups can be counted in single digits. This is especially true considering the specific duties on London Boroughs to assess and plan for the accommodation needs of Gypsies and Travellers.

3. Importance of a Pan-London strategic approach to Gypsy and Traveller accommodation

As already stated in this submission, TM believe there would be great benefits in the GLA conducting a London wide Gypsy Traveller accommodation needs assessment and integrating its findings into the strategic policies in the London Plan and the London Housing Strategy.

There are a number of key benefits to this approach:

- Would allow neighboring boroughs and/or clusters of boroughs to marry identified need with land use. It might be the case that one borough has a high need, however doesn't have land available to meet that need and could potentially work in partnership with another borough with more flexible land use. This approach requires a degree of strategic oversight, guidance and support.
- Provide an element of scrutiny of boroughs needs assessments and the progress they are making in delivering Traveller sites on the ground. It would also enable a more effective means of addressing cases of unauthorised sites in relation to unmet need.
- Would promote more robust and uniform local needs assessments which would inform a London-wide assessment.
- Would reinforce the duty to cooperate and promote good practice.

It is evident from TM's work in London and nationally that the Government's duty to cooperate is not being effectively implemented when it comes to the planning and provision of Traveller sites. We are only aware of two London boroughs (Kensington and Chelsea and Hammersmith and Fulham) who are working in a cooperative manner for the purposes of carrying out a needs assessment in their areas.

⁴ <http://irishtraveller.org.uk/wp-content/uploads/2013/08/Gypsy-and-Traveller-population-in-England-policy-report.pdf>

4. How is access to health and education limited by the lack of sites?

Soon to be published research by the TM for the Department of Health's Inclusion Health Board into the impact of insecure accommodation and the living environment on Gypsies' and Travellers' health had two key findings relevant to questions in this call for evidence on impact of access to health services by the lack of sites:

- Current and historical accommodation insecurity negatively impacts on Gypsies and Travellers physical and mental health. Effectively addressing accommodation insecurity/provision of sites will have a direct and positive 'knock-on' effect not just on community members health, but on the wider social determinates that impact on their intergenerational health and wellbeing (education, employment etc).
- Unauthorised and authorised sites for Gypsies and Travellers (including local authority owned and run) are all too often situated in environments which promote poor health (busy roads, beside heavy industry etc). Improving the environmental health factors of existing sites and promoting appropriate future development of Traveller sites will improve health outcomes in the long-term. Such measures are also likely to prove cost-effective in terms of reduced ill-health and disability, increased mental health etc.

TM is also very aware of the impact a lack of sites (and consequently increased unauthorised encampments and evictions) has on Gypsy and Traveller children's education and welfare. TM's experiences are summed up in a piece of research with Gypsy and Traveller children living on unauthorised/insecure site by the Children's Society:

'Moving on from a site brought up a feeling of loss for some children. Where a site had been established for a while, children were leaving an area that was their home. Links that had been made with local communities were severed, such as friendships made at school ... where they were moved on by force there were feelings of fear ... A forced eviction can be a threatening and frightening experience for children. There is a fear of someone taking your parent away, taking your home away, or of people you care about being hurt.' (Children's Society)

Children's Society, 1998, Children's Participation Project, *My Dream Site*. Midsomer Norton

5. How should councils deal with unauthorised encampments?

Firstly when councils are dealing with unauthorised encampments they should be aware that unmet need/the failure to meet need for Traveller sites within their area has a direct impact on incidents of unauthorised encampments. The long-term sustainable approach to addressing unauthorised encampments is for **ALL** councils ensure they are making appropriate provision.

Councils should be mindful of exiting legislation and guidance on taking enforcement procedures against Gypsies and Travellers on unauthorised encampments and make sure they carry out appropriate welfare assessments before taking any action. They should also be aware of ACPO guidance on unauthorised encampments. Shelter

provide a useful summary of councils responsibilities in such situations, as does ACPO in relation to the police's role:

http://england.shelter.org.uk/get_advice/sites_for_gypsies_and_travellers/eviction_by_the_council

http://www.acpo.police.uk/documents/edhr/2011/20110913%20EDHR%20ACPO%20Guidance%20on%20Unauthorised%20Encampments%20Revised_Version%2013_Internet_June%202011.pdf

Ideally councils should refrain from taking enforcement action and instead should promote local authority use of **Negotiated Stopping Places** based on the model successfully piloted by Leeds Gypsy and Traveller Exchange and Leeds City Council:

<http://www.leedsgate.co.uk/2013/11/25/negotiated-stopping-versus-transit-sites-whats-the-difference/>

Boroughs

How do you go about assessing current and future housing need among the local Gypsy and Traveller community?

- What use have you made of the 2008 Pan-London GTANA? Are its results still valid?

The 2008 GTANA was the basis for needs identified in Camden's Core Strategy (Policy CS12) adopted in 2010. Being over 6 years old would indicate that it is out-of-date and subsequently there were also significant concerns about the methodology.

- Have you produced your own borough GTANA? If so, please direct us to the findings.

We have commissioned Opinion Research Services (ORS) to undertake a needs assessment and expect to finalise it by early 2015.

- Do you operate a waiting list for pitches? If so, what criteria do you apply to prioritise the list? To what extent does a waiting list contribute to needs assessment?

Yes we operate a waiting list. The following is an extract from our lettings policy:

Allocation of pitches

The waiting list will be kept in date order. Although consideration will be given to those at the top of the list, priority will be given to Travellers' who meet one or more of the following criteria, and in the following order:

1. Those who are living on a Travellers' site in Camden and are overcrowded.
2. Those who currently hold a licence agreement for Travellers' pitch in Camden and want to move to a different pitch. n.b. anyone accepting a new pitch will be required to give up their current pitch.
3. The length of time someone has been waiting on the waiting list
4. Those who are living on a Travellers' site in Camden and have a particular need for an established base, including older people and those with children or who are pregnant.
5. Close family members of other residents on the site
6. Those who need to live on the site because of a medical or welfare need e.g. because they are caring for another resident on the site, or need to be cared for by another resident on the site.
7. People who have a genuine need for caravan site accommodation based on an aversion to bricks and mortar housing.

The consultants carrying out assessment for Camden have taken account of the waiting list. A number of households on the waiting list currently occupy 'bricks and

mortar' accommodation. On the basis of existing government guidance, these households are identified as forming part of the need whether or not they have ceased travelling and whether or not their existing accommodation is unsuitable. However, the government is currently consulting on changes to the guidance that would narrow the scope of need.

- How are you meeting the Duty to Cooperate with neighbouring authorities?

The current national policy (albeit subject to recently published consultation on changes) says: “*Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning*” and a Duty to Cooperate also implies that such provision is a strategic matter. On this basis ORS approached a number of neighbouring authorities.

Whilst the London Plan similarly identifies provision as a strategic issue, it leaves it solely to boroughs to come to a view “in the light of local circumstances”. Those local circumstances are likely to steer well way from the controversial subject of providing sites for gypsies and travellers.

In the light of this it is therefore unsurprising that our consultant’s contacts with neighbouring authorities indicated that there was a lack of recognition and resistance to identify any needs.

Camden has also started talking to neighbouring authorities on our local plan review.

- Do you see a value in a revised pan-London or sub-regional GTANA commissioned by the GLA?

Yes. As above, our consultant’s contacts with neighbouring authorities indicated a lack of recognition to identify any needs. It also highlighted the common difficulties in delivering any sites primarily due to lack of potential land and high land values.

This does not help deliver or contribute to a coherent or effective sub-regional/regional understanding or approach. In the inner London context individual borough needs assessments may identify a target, but ultimately these targets will be impossible to meet and it would be wrong to pretend otherwise and cooperation is required where local authorities are limited in their supply of suitable sites.

The above all indicates such considerations need to be dealt with on a strategic basis.

- How else might the Mayor support the housing needs assessment of Gypsies and Travellers?

As well as taking the lead in identifying needs in a strategic manner to also assist in identifying allocating and funding the use of public sector land where such provision could be met.

- **How many authorised and unauthorised sites and pitches are currently situated in your borough?**

There are 2 authorised sites containing 5 authorised pitches (Castlehaven Road and Carol Street containing 1 and 4 pitches respectively). There are no unauthorised sites, however the largest site suffers from overcrowding which is Camden's main issue to resolve. In addition there is a Travelling Showpeople's site which currently has 3 plots in use with two vacant plots.

- **What are the main problems encountered when identifying and providing sites?**

Camden is a heavily built up borough with high land values and competing uses/needs and the scope for identifying deliverable sites will always be severely constrained.

- Which criteria do you apply when considering proposals for new sites?

Policy CS12 sets out the following criteria:

New sites, plots and/or pitches for gypsies and travellers and travelling showpeople should:

- a) provide a satisfactory layout and facilities in terms of pitches, hardstanding, parking, turning space, amenity blocks, open space and play areas;
- b) be capable of connection to energy, water and sewage infrastructure;
- c) be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
- d) provide safe access to and from the main road network;
- e) not cause harm residential amenity or the operational efficiency of nearby properties;
- f) not cause harm to open spaces, Metropolitan Open Land, Sites of Nature Conservation Importance, woodland, water courses etc, and
- g) incorporate appropriate landscaping to prevent harm to the character and appearance of the surrounding area.

In any search for sites there will also inevitably be factors such as ownership/value, competing needs and alternative proposals that will constrain identifying suitable sites.

- Has your site allocation process changed since pitch targets were removed from the London Plan? If so, please indicate how.

Yes. As above, ORS were commissioned to carry out a needs assessment where the main priority is to tackle an overcrowding problem.

- Since GTANA 2008, how many net new sites and pitches have been created and sustained in your borough?

None.

- If you are unable to meet the need for new pitches, are you prioritising Gypsy and Traveller applicants for social housing?

Camden's social housing allocations policy does not give specific priority to gypsies or travellers. However, all cases are considered on an individual basis, and we have given priority for social housing to four cases recently; one of these cases has accepted an offer of social housing.

- How many Gypsy and Traveller residents are accommodated per annum in mainstream social housing in your borough?

We have not collected this information in housing applications historically and do not collect this information in relation to social housing applications at present so unfortunately we are unable to answer this question.

David Morrissey
Principal Planner
Regeneration and Planning
Culture and Environment
London Borough of Camden

Sub-009

London Assembly Housing Committee

City Hall

The Queen's Walk

SE1 2AA

London

Jennifer Maughan

327A Bowes Road

Enfield

N11 1BA

London

I am an Irish Traveller from Hackney, I've been living in the borough for over 14 years, on unofficial camps and in private rented flats because there aren't enough sites there. I've been on the council's waiting list for all this time. Almost a year ago I was moved by the council to a flat in Enfield as temporary accommodation, where I live with my 4 children. This is affecting us very badly, especially my health and my kids' education. I want to respond to some of the questions in this investigation to give evidence of my experience and the impact of lack of sites on the community.

- Do you see a value in a revised pan-London or sub-regional GTANA commissioned by the GLA?
- How else might the Mayor support the housing needs assessment of Gypsies and Travellers?

Since the Mayor came into power he has done nothing for Travellers to meet their needs. Travellers feel like he is discriminating against the Gypsy and Traveller community. We were consulted almost 7 years ago on our needs for the London GTANA and those numbers were supposed to go into the London Plan. This would have been fair, as he sets targets for other housing which gets built. If he commissions a new needs assessment he should set a target for pitches in the London Plan the same as for general housing to make sure the boroughs are delivering the sites they need.

- What are the main problems encountered when identifying and providing sites?
- Have you been involved in the site allocation process? Could Gypsy and Traveller engagement with the process be improved?

The biggest barrier to finding sites is discrimination. Councils prefer to build flats and general housing rather than Gypsy and Traveller sites. In our eyes this is discrimination. In Hackney I've been putting forward land for sites for over 10 years. Every time I was told that it's not possible, that the land was being used for something else or the council didn't have any land. But yet when one site had to be closed down for the Olympics they found three sites in Hackney to relocate them. However the Travellers in bricks and mortar have still not received anything from the council. For me this was very frustrating because there will always be a reason for councils to turn down our

proposals. We have knowledge of what sites would be suitable for Travellers and the councils are only looking at lists on their computers, so they can't understand what we need. This can be improved by better relationships between the council and Travellers, by listening to people and taking their needs seriously. Councils should also prioritise Gypsy and Traveller sites and change the use of land to be able to meet needs. In the case of the Olympic sites, some land such as Metropolitan Open Land was turned into a Travellers site because there was pressure on Hackney council.

- What would be the best way to assess the current and future needs of the Gypsy and Traveller community?

Councils should set up more Traveller support officers in their councils, because in every borough there are Travellers and in some places they have nowhere to turn to. Because there aren't enough sites in London many Travellers live in housing and are overlooked by the councils or by the government. When doing needs assessments councils should start from the assumption that everyone who lives in bricks and mortar needs a pitch unless they say otherwise. In order to keep a record of how many people need pitches the council should keep a waiting list and try to meet their needs.

- What happens to a member of the community who can't get a pitch?

In my situation I've been living in Hackney for the last 14 years, half of that was on unofficial caravan camps and housing. At the moment Hackney council has put me and my four kids in temporary accommodation in Enfield London which is significant in distance from my kids' primary and highschoools and from my family and friends and the Traveller community. This is having a big impact on my health and the kids. This is why Travellers need permanent pitches in sites in Hackney because that's when they have a home. They don't count when they're in flats or houses as having a home. They are isolated from everybody from the Traveller community when they're in flats and houses.

- How is access to health and education affected by limited site provision?

Me and the kids have the same doctors surgery, dentist, schools in Hackney because Hackney has a good reputation with the Travelling community and I would not like to change to any of these in Enfield because my kids were born in a Hackney hospital and yet we've been put out of the borough. Because there are no pitches available in Hackney for us, we had to move far away but we need to keep the same services and this means we have to travel very far for school and medical attention.

- How should local authorities engage with Gypsies and Travellers living by the roadside?

I have an example of where I was living in a unofficial caravan camp for a year. We kept it clean, the council brought portable toilets. It was on land owned by TfL, which we got on very well with. They would come out every couple of weeks with the local police officer to see how we are and when they asked us to leave we left. If the council has a good Traveller liaison officer who comes and help Travellers the Travellers will help them back and not cause any problems.

Sub-010

London Assembly Housing Committee

City Hall

The Queen's Walk

SE1 2AA

Kathleen McDonagh

21 The Fairview

N13 5NE

Enfield

London

23 September 2014

Response to the London Housing Committee Investigation on Gypsy and Traveller Needs and Provision

I'm an Irish Traveller living in a flat in Enfield and I want to answer to the questions 'What happens to a Traveller who cannot get a pitch?' and 'What is the impact of not having enough sites?'

When living in a house I feel like I am smothered, choking, afraid, and constantly being watched. I can't cope in a house, I am afraid of my neighbours. If I was on a site I would be with my own who would accept me.

Putting Travellers in a house is like putting animals in a cage. Living in houses puts strain on our relationships and causes lots of break ups.

Living in a house you don't really see your children as they are always in their room, when Travelling everyone is together. When travelling my children are healthier and have colour.

On a site everyone looks out for each other and everyone looks after each other's children. Travellers still need a base to store their belongings.

Since the bedroom tax came in, I was forced to give up my home to find a cheaper property, I had worked hard to build up good relationships with my neighbours, and now I have had to move to a new place I am facing harassment from my new neighbours.

Government is taking our culture away from us because they don't provide enough sites and they want to change the definition of Traveller.

Sub-011

Housing Committee
London Assembly
City Hall
The Queen's Walk
SE1 2AA
London

Marian Mahoney
12 Old Willow Close
E3 4RE
London

I'm an Irish Traveller and I have been living in Tower Hamlets on the Eleanor Street Traveller Site for over 30 years. Recently the site was moved very close by due to Crossrail works and it is now called Old Willow Close. The site has 19 pitches and nothing new has been built in the borough since this one. Our families are growing, there are now around 5 children on each pitch and there is nowhere for them to go to continue living their traditional lifestyle.

It is not fair and justified to have targets for housing but not for pitches in the London Plan. We are Londoners too but we don't get the same say as everyone else. There is no fairness in the process, although there was a needs assessment done in 2008 to put targets in the London Plan this didn't happen in the end. Every council knows that once they have a Travellers site in their area there will be growing need for more pitches. I feel we didn't have a chance to have a say about our ethnic way of life, as the Mayor chose not to take responsibility for Gypsy and Traveller sites in London.

Councils say they don't have land to provide the sites we need. In Tower Hamlets they've been saying that for 20 years, but then they allowed a large Tesco to be built. There's always land for shopping centres, stadiums, garages, big stores, flats, so why can't they find land for Gypsies and Travellers? Big stores come and go and even when they don't succeed and leave the land vacant, the council won't build sites for Travellers. Even with the Olympic Legacy they couldn't find land for Travellers, although the LLDC area was vacant for many years and that is now all gone. To build the Olympic Park and surrounding neighbourhoods land that was toxic was cleared up and used for housing, but not for Traveller sites.

In terms of looking for land and proposing sites to the council, I met with a councilor 3 years ago and pointed out land in Isle of Dogs, Whitechapel and Bromley-by-Bow to build 2-3 pitches here and there. I never heard back from the council on this. When they built flats in these areas they could have allowed for a few pitches to be put there. There's also room behind our site for 2-3 pitches. It would be good to know who the key people are in the council and who makes decisions. We have to find them ourselves which is very hard. There should be a strategy group for Travellers in each council with directors from the housing and planning departments who would meet with the community and discuss potential sites and be able to explain the process. Council officers should be made aware of Traveller needs because in many cases they don't even know they have a Traveller site in their area.

When people can't get a pitch, if they have a caravan they go onto illegal camping, they are forced off the road by the council and police, they can get arrested. When young people grow up they go into private rental, or they double up with the parents on their pitches because they don't want to leave their culture. Their culture is at home where they live and come from. That makes them happy and keeps them alive.

My daughter has been in a house for 5 years, she's been moved to Walthamstow and she suffers from bipolar, has 5 kids, comes to the site sometimes, because she can't live between 4 walls. She is trying to get back on site, living in a house she has no future and it's making her condition even worse and affecting her children very badly. They are so confined, all they see is the main road and trees.

Our community is affected because there aren't enough sites, by mental health impacts, insecurity, anxiety, feeling that you've lost something the whole time, feeling like you've lost your future. We've integrated in society but we need to keep our culture, we don't mind change if it leaves us having our life the same as always, living together with our families. Travellers have been around for years working in London, we aren't being recognised, we can't see why we can't live the way we want to live, all we want to do is to live on sites. We adapt the way we can, we've been affected by many laws, taken off the roads but did the best to adapt to sites. We want to be able to live our way as any other ethnic minority. The effect on our young people is unbearable, because they want to mix with the community, but they don't have where to go. This is causing lots of resentment against the government. Our children feel like second class citizens, sometimes they ask why the council can't built sites for them. Even those who have married with others came and moved back on sites because they can't live another way.

Regarding unauthorised camps, councils should have sympathy. If the Travellers are only passing through they should have toilets, medical needs taken care of, give them a bit of time, charge them for the bins and water. Travellers just want to stay somewhere for a while, and they have the same needs as everyone. If they're not just passing through, they set camps because they don't have where to go. So there need to be more transit sites, so Travellers can live there for a while, for the winter and then move along. Once these are kept in good order this should be alright and not cause any problems.

Sub-012

Thank you. Sorry that this is after your deadline for comments, but if not too late in response to your questions we would say comment that the 2008 assessment is regarded as too out of date for planning purposes and authorities are commissioning their own surveys. We would also question whether there shouldn't be more of a strategic lead from the GLA on G+T provision rather than each borough having to deal with these issues individually.

Kind regards

Tom

Tom Tyson

Strategy Team Leader
Partnerships and Commission
London Borough of Lambeth

Response to the Housing Committee Investigation on Gypsy and Traveller accommodation needs and provision in London September 2014 | Chair the Gypsy, Roma and Traveller Strategy Group for the London Borough of Hackney.

Site provision has been one of the main issues with which we have occupied ourselves in recent years. Hackney has a core strategy commitment, formalised in 2008, to maintain our existing 27 pitches and to seek to provide more. Twenty of our pitches lay on one site within the Olympic Park at Waterden Road and they were reprovided in time for the Olympics across three sites within the borough. However no new sites have been identified in our Site Allocation Local Plan (SALP).

Local Traveller representatives, London Gypsy Traveller Unit workers and I have met with council officers and the responsible cabinet member to question the lack of new site identification. The issue has been discussed at Scrutiny and questions have been asked of Hackney's Mayor Jules Pipe. I believe Trevor Phillips once said that "Travellers are the new Blacks". In terms of an unconscious, institutional prejudice I think from my experience that he is right. Despite the 2008 Gypsy and Traveller Accommodation Needs Assessment for London, identifying a city-wide need for an average 540 pitches, all target numbers were stripped out of the London Plan. Consequently there is no specific borough or sub-regional plan against which local authorities can be held accountable. Officers and politicians alike are easily bent by the demand for high density housing especially in an inner-city borough like Hackney so that a SALP with no provision for Traveller sites looks like it will be found to be lawful. Officers report that neighbouring boroughs, when asked to co-operate in joint searches for a sub-regional solution, have stonewalled any attempt at co-operation.

Only when the imperative of being ready for the Olympics was a driver has any concerted action to find new sites taken place in London in the last twenty years. If you as a committee are serious about guaranteeing more site provision in London you must demand that specific measurable targets for new pitch numbers, at borough or sub-regional level, are included in the London Plan and that mechanisms for their delivery are managed through the GLA.

Chris Kennedy
Councillor Chris Kennedy,

Hackney Wick, London Borough of Hackney

Dear Sir Madam,

My name is John Power,
I was born into a travelling family in 1949 in southern Ireland,
I have never known any other way of life i married a traveller girl
in 1970 we have five children who are all married and all but one are
currently living in council property out of necessity rather than choice,
In 1984 my wife who sadly passed away in 2010 and i moved a piece of
vacant council land in Camden because we felt that travelling was coming
to end and we wanted our children to have an education,
We considered ourselves very lucky to have been allowed to stay on
our site my wife and i unfortunately separated in 200 and i moved into
a one bedroomed flat and i hated it not the flat itself but the thought
of having to live in bricks and mortar it seemed to take away any sense of
freedom that i had my sons and daughters feel the very same and every
traveller who has to live in houses have told me they feel the very same,
Although we were in a small one family site we were happy it helped us to keep our culture
alive people often wonder why we prefer this way of
living but just like the Native American the Eskimo the Mauri and the
aborigine we should be entitled to live the life we are most contented with,

We are not out to destroy anybody or anything but to live among communities in peace with
respect for house dwelling neighbours
and their properties,

when my wife passed away in 2010 she signed the site over to my youngest son Sean i have
been asking Camden council for the last thirty
years to provide small family sites for myself and my family and for for another traveller
family who have lived in a small family site in Carol st
nw1 although the council was awarded £700.000 in 2011 to build ten pitches
the council said they could not meet the deadline of april 2015 because
they could not find suitable land for sites, myself and my family and
the family from Carol street managed to find at least thirty pieces of land
that were never or ever likely to be earmarked for building on,
So the money was rejected and given back,

yours truly John Power

London Tenants Federation

LTF submission to London Assembly Housing Committee investigation into Gypsy and Traveller site provision in London

03.10.14

1. **Introduction:** London Tenants Federation (LTF) is an umbrella organisation. It brings together (mostly) borough- and London-wide federations and organisations of tenants of social housing providers. Our membership includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations. A number of our member organisations involve both council and housing association tenants and a few (a minority) also involve some private tenants.

LTF aims to facilitate a consensus voice for tenants on strategic regional housing and planning policy related issues. It has had representation on the Mayor's Housing Forum since 2005 and its members have attended, by invitation, all Examinations in Public relating to the London Plan, since 2007.

LTF has strong links with other community and voluntary sector organisations in London that also have an interest in housing, planning and community related issues.

Through its membership of Just Space, it has links with the London Gypsy and Traveller Unit. LGTU representatives have spoken at LTF meetings and have supported in the facilitation of workshops at LTF conferences and events. LGTU representatives and members have engaged in workshops that LTF has delivered on housing policy issues in London.

LTF also has links with LGTU through our Trust for London project, which supports tenants, residents and other community groups in trying to influence policy in areas where large scale developments are taking place. Through this project we are also working with People of the Road in Ealing.

LTF is principally concerned that housing needs of least well off and most excluded and disadvantaged communities in London are not being met. The backlog of need for market housing (as assessed in the 2013 SHMA) is the equivalent to less than one year's average delivery of market homes from 2007–13, while the backlog of need for social-rented homes (as assessed in the 2013 SHMA) is equivalent to 12.5 years average delivery rate of social / affordable rent homes from 2007-13. There is significant unmet need for gypsy and traveller sites leading to gypsy and travellers being accommodated in general needs housing. The 2008 Gypsy and Traveller needs assessment identified that at least 800 new pitches were required in London over a 10 year period.

Key issues that LTF would like to raise are:

- (a) **Assessing needs of gypsy and travellers and strategic policy on addressing that need London-wide.** Diverse housing needs of Londoners should be adequately assessed not just at the local level but also at the London-wide level. LTF was involved with the working group involved in the development of the 2013 SHMA and SHLAA and supported criticisms made by LGTU, through Just Space, of the failings to adequately assess gypsy and travellers housing needs at the strategic London-wide level. The SHMA was based on data from the English Housing Survey, 2011 Census and GLA demographic projections, which LTF felt was anyway inadequate in providing sufficient evidence to properly assess London's housing need, but particularly so in terms of diverse and specialist housing need.

The removal of a London Plan strategic London-wide target for gypsy and traveller sites and pitches would appear to singly exclude one vulnerable group with specific needs.

There was wide discussion at the FALP EIP on the relationship between locally assessed need and London-wide need for housing and whether there was potential for conflict between them. The Mayor's views on gypsy and travellers' housing needs contradict those he has generally on this issue.

Through our Trust for London project work, LGTU and People of the Road have highlighted difficulties around sufficient gypsy and traveller sites being identified at the local level. Sometimes this is the case even where gypsy and traveller groups have identified and proposed possible sites to the boroughs. Examples of this are in Greenwich and Newham, where at the same time many large scale developments are taking place. A London-wide overview / monitoring of delivery of sites and pitches would help in this respect.

- (b) **Appropriate housing for gypsy and travellers.** The failure to address requirements for sites and pitches results in increasing numbers of gypsy and travellers being inappropriately housed in social-rented or private housing. Across the UK around three quarters of gypsy and travellers are now living in conventional housing. There is evidence that this impacts detrimentally on a community that already has considerably higher levels of poor health and lower life expectancy than the average. It is, as one group we have worked with describes as, 'the elephant in the room'.
- (c) **Delivering supportive and lifetime neighbourhoods.** LTF fully supports policies in the London Plan that promote delivery of Lifetime Neighbourhoods. This requires delivery of a wide range of housing to meet the needs of individuals throughout their lives. It also means provision of accessible and affordable social and community infrastructure and facilitation of community empowerment through engagement, particularly in decision-making.

Given the huge number of new developments taking place in London, LTF feels it is essential that (i) where new neighbourhoods are being developed that these are genuinely lifetime neighbourhoods and (ii) that sites appropriate for gypsy and

travellers should be identified within them. This would provide not only adequate access to the schools, health services, social and community infrastructure needed by all sections of the community, but also opportunities at early stages of developments to establish of good levels of communication and community cohesion. This should be promoted in policy at the local and regional level.

Yours sincerely

Pat Turnbull and Michael Hewlett
Mayor's Housing Forum delegates
London Tenants Federation

Address: 50 Memorial Avenue, West Ham, London E15 3BS **Telephone:** 07931 214 913
Web address: www.londontenants.org **Email:** info@londontenants.org
London Tenants is a company limited by guarantee, registered in England / Wales No 8155382

Gypsy and Traveller site provision in London – London Assembly Housing Committee investigation, August 2014
Responses to questions in the ‘Boroughs’ section of the investigation from the Royal Borough of Greenwich

Thank you for the opportunity to contribute to the investigation into gypsy and traveller site provision in London. Below are the responses to the questions from the Royal Borough of Greenwich.

1. How do you go about assessing current and future housing need among the local Gypsy and Traveller community?

The Royal Borough of Greenwich will be commissioning specialist consultants who will undertake a gypsy and traveller accommodation needs assessment using both primary and secondary research in the near future.

2. What use have you made of the 2008 Pan-London GTANA? Are its results still valid?

Royal Greenwich did not use the 2008 Pan-London GTANA as evidence in the preparation of its *Royal Greenwich Local Plan: Core Strategy with Detailed Policies*, we therefore did not reference it in this document or supporting documents.

3. Have you produced your own borough GTANA? If so, please direct us to the findings.

We will be commissioning a GTANA in near future, as indicated in the *Royal Greenwich Core Strategy*.

4. Do you operate a waiting list for pitches? If so, what criteria do you apply to prioritise the list? To what extent does a waiting list contribute to needs assessment?

Royal Greenwich does operate a waiting list for pitches and there are currently 19 applicants on the list. Pitches are allocated by length of time on the waiting list. Applicants citing ‘priority need’ (e.g. disability, domestic violence, medical) are considered first. Three pitches have been allocated since November 2010 and turnover is therefore infrequent, with all allocated according to the length of time on the waiting list, as applicants did not identify a priority need.

A waiting list does give some indication of the level of need for additional pitches in the Borough, and this will be fed into the new needs assessment. As part of the development of the GTANA Royal Greenwich would ensure that those households on the waiting list are interviewed and their needs/views incorporated into the assessment.

5. How are you meeting the Duty to Co-operate with neighbouring authorities?

Royal Greenwich has a long history of working sub-regionally with its neighbouring boroughs through the South East London Housing Partnership (SELHP). The partnership holds regular planning policy meetings attended by officers from the 5 boroughs which consider Duty to Co-operate. The London Borough of Lambeth has also attended when gypsy and traveller accommodation needs are discussed to ensure the wider South East London health area is covered.

6. Do you see a value in a revised pan-London or sub-regional GTANA commissioned by the GLA?

A pan-London study would provide an overview of need across London, but sub-regional requirements are already reviewed and kept focused through the SELHP Duty to Co-operate group meetings held regularly. This ensures a joined up approach to traveller issues. Locally specific issues should be addressed through the GTANA being commissioned by Royal Greenwich.

7. How else might the Mayor support the housing needs assessment of Gypsies and Travellers?

Regional guidance to the government’s *Planning Policy for Traveller Sites* that addressed London’s unique housing circumstances would be a useful tool for London boroughs when they are carrying out local gypsy and traveller accommodation needs assessments, to ensure a common approach across boroughs.

8. How many authorised and unauthorised sites and pitches are currently situated in your borough?

Royal Greenwich’s Thistlebrook site holds 40 authorised pitches, one of the largest in London. In addition there is a tolerated site which contains 14 mobile units/vans, accommodating 5 families. This site has been occupied for a

number of years during which time Royal Greenwich has offered the families the opportunity to join the register for the authorised site at Thistlebrook and social housing, to alleviate the conditions they have exposed themselves to by occupying a site next to commercial premises.

We have a traveller manager who manages the Thistlebrook site and liaises on general traveller needs in the Borough

9. What are the main problems encountered when identifying and providing sites?

The main problem is the lack of available appropriate land, as defined by the criteria set out in *Royal Greenwich Core Strategy Policy H4*. This issue is very likely a similar one across all of Greater London. If land was identified as being both appropriate and available, it is likely that it would also be identified for the provision of mixed tenure housing thereby having conflicting need. Opposition from the public to the provision of a site, if near a residential area, would also be a factor in determining suitability.

10. Which criteria do you apply when considering proposals for new sites?

The *Planning Policy for Traveller Sites* sets out criteria that should be considered and reflected in local plan policies, and this has been done and set out in *Royal Greenwich Core Strategy policy H4*.

11. Has your site allocation process changed since pitch targets were removed from the London Plan? If so, please indicate how.

Yes. The *Royal Greenwich Core Strategy* was adopted in July 2014 and policy H4 replaces UDP policy H22.

12. Since GTANA 2008, how many net new sites and pitches have been created and sustained in your borough?

No new sites and pitches have been created.

13. If you are unable to meet the need for new pitches, are you prioritising Gypsy and Traveller applicants for social housing?

Gypsy and traveller families are assisted and assessed in the same way as any other applicants requesting assistance with housing. If they are homeless they are assessed by our Housing Options section, and other are advised how to join the housing register and the bidding process. Most gypsies and travellers are adverse to bricks and mortar and therefore do not wish to be considered via this route. There is currently one family bidding for alternative accommodation.

All families on the tolerated site in Royal Greenwich have been offered rehousing options and access to pitches on the Thistlebrook site. However, all have refused both offers and indicated that they do not want to be considered for those options.

14. How many Gypsy and Traveller residents are accommodated per annum in mainstream social housing in your borough?

Royal Greenwich does not currently collect this data.

FINAL VERSION, PUBLISHED 30.09.14

Operating Procedure
for
the Assessment of Accommodation Need
and the Allocation of Pitches on Traveller Sites
owned and managed by Kent
County Council

Author: Pal Sandher

1. Purpose

The purpose of this procedure is to detail and regulate how pitch applications are processed, how accommodation need is assessed and how pitches are allocated on Kent County Council owned and managed Gypsy & Traveller sites.

2. Policy Statement

Kent County Council will:-

- ensure that the County Council's policies on Equalities and Customer Care are met promote the health and safety and quiet enjoyment of pitches by all its site residents, and ensure that the operation of the allocation policy assists in meeting that outcome
- ensure that caravan pitches are allocated on the basis of priority need and the sustainability of the caravan site
- ensure that a fair and equitable system of allocation of caravan pitches is clearly established and followed, even though there may be variation in the allocation policy for specific sites, if it has been formally agreed and publicised.
- Only ask questions and carry out checks which are appropriate to meeting these other objectives, and in compliance with the Data Protection legislation and its principles
- provide an efficient and helpful service which is responsive and sensitive to the needs of Gypsies and Travellers
- acknowledge that Gypsies and Travellers belong to recognised ethnic groups, but "gypsies and travellers" includes a wider range of people, and to confirm that these sites are provided for the needs of all those eligible to apply. We note that the Government is currently consulting on proposals to restrict both the planning and housing policy definitions of "gypsies and travellers". This could have long-term implications for who is eligible for sites we manage.
- Only offer a pitch to a main or sole pitch occupier who is eligible to apply and over 18 years of age at the time of pitch offer.
- Treat any adult applicant to be part of an existing household, or be a joint pitch occupier, in the same way as any other applicant for a new pitch.

3. Processing of Applications for a pitch, or an extra person in a household already on a pitch

3.1 Applicants can ask to be included on the Waiting List by filling in an application form. The same form should be used by someone applying to have an extra member of their household, or a joint pitch occupier, filling out the parts that are relevant. The application form can be downloaded

from our KCC website and printed out and filled in. Or an applicant can make contact with the Gypsy & Traveller Unit to request a form as detailed below:-

Email: GypsyTraveller@kent.gov.uk

Phone: 03000 414141 – and ask for the Unit

By letter to:

Kent County Council Gypsy & Traveller Unit

1st Floor, Invicta House,

County Hall, Maidstone,
Kent ME14 1XX

3.2 The applicant can ask a third party to complete the form on their behalf, but they must sign it. Do ask for help from Council or other staff. Or you can fill in the application at the interview, if you cannot do it before

3.3 All application forms must include some form of site or street address (which can receive post), and at least one telephone number, and be signed and dated by the applicant. If an applicant cannot sign, they should either get someone to sign on their behalf, or make a mark, and have a witness confirm this on the form, and sign and put in their details.

3.4 To apply, you need to meet our criteria: being a gypsy or traveller, as defined by law, or a Gypsy or Traveller under the ethnic definition

3.4 Applicants must provide the names and addresses of two referees, preferably from recent site operators, landlords or employers

3.5 Applicants are required to renew or update their application every 12 months. The GTU will contact applicants on their latest provided telephone numbers or address. It is up to applicants to keep this up to date.

3.6 Applications received will be date stamped as they come in and recorded onto our Live Applications spreadsheet. KCC will acknowledge receipt within ten working days. Forms including personal details, and other personal information, will be managed in accordance with the Information Governance policy of KCC.

3.7 Applicants will be invited to attend an interview with the GTU which will take place within 8 weeks of their application being received. Until an applicant has been interviewed, they cannot be offered a pitch.

3.8 At the interview, the interviewer will go through the application and seek to fill in remaining details.. Applicants will be asked to provide original identification material (passport, birth certificate, utility bill) and any missing or incomplete information. The application will not be live on the KCC GTU waiting list until the application process is complete.

4. Accommodation Need Assessment Procedure

4.1 Each application will receive a score based on information provided and assessed.

4.2 All applications information will be checked, by the police, against police records to verify details of any unspent convictions or cautions (according to the Rehabilitation of Offenders Act 1974, as amended) that have been provided (or not) by the applicant. The County Council will disqualify any applicants that it reasonably deems to have provided false or misleading information or chosen to omit details for the purpose of fraudulently gaining a pitch on a KCC site.

4.3 A panel made up of staff from the Gypsy & Traveller Unit and, in some cases, from the borough or district council will go through the following as detailed in section 4.4.

4.4 Seven main factors are considered for assessing housing need, which are:-

1. Local Connection
2. Problems with Existing Accommodation
3. Security of Tenure
4. Welfare Considerations
5. Family Considerations
6. Educational Considerations
7. Medical Conditions

4.5 The County Council, drawing on any expert advice necessary, will endeavour to ensure a fair and equitable approach in all cases, even though subjective judgements may be involved.

4.6 Caravan pitches will be offered, in order, to the applicants with the highest points score. In the event that two or more applicants' point's scores are equal, priority will be given to the applicant that has been on the Waiting List the longest time.

4.7 Kent County Council's decision in relation to caravan pitch allocations will be final.

4.8 Where an interview has taken place more than six months before, KCC shall have the right to ask for a fresh interview to update applicant details.

5. Appeals/Complaints Procedure:

5.1 If you have a concern or complaint over any aspect of the process or decision, you must advise the Council through Kent County Council's Compliments and Complaints Procedure. A copy of this can be obtained by contacting the Council's Contact Centre on: **03000 41 41 41** or write in to the address referred to in Section 3.1.

6 Amendments to this Operating Procedure

6.2 Amendments may need to be made, from time to time, to this Operating Procedure, if the law (whether legislation or case law) requires it, or any significant circumstances change.

Any exceptional decisions under this Operating Procedure will only be made on legal advice, and we would expect them to be very rare.