

Response ID ANON-CA6A-X7ZQ-N

Submitted to New Towns Draft Programme Consultation
Submitted on 2026-05-18 18:07:20

Introduction

1 Which best describes your response?

on behalf of an organisation

2 Which area are you responding about?

specific proposed new town location

Crews Hill and Chase Park, Enfield, South Barking, Barking and Dagenham, Thamesmead, Greenwich

If you are responding about a wider region, please select which region you are responding about from the drop-down list:
London

3 What is your connection to the proposed location/region?

other

If you selected other, please expand here:

London Gypsies and Travellers is a community-based charity working for a truly inclusive London where Gypsy and Traveller communities can thrive

4 If you are responding on behalf of an organisation, please select the type of organisation you are responding from below

charity

If you selected other, please expand here:

5 If you are responding on behalf of an organisation, what is the name of your organisation?

Please enter your answer here:

London Gypsies and Travellers

6 If you are responding on behalf of an organisation, what size is your organisation?

micro (1 to 9 employees)

Section 3.1 - Assessment of locations

7 Thinking about the 13 locations listed, which location(s) do you believe have positive features that could help achieve the objectives of the New Towns Draft Programme?

Chase Park and Crews Hill, Enfield, South Barking, Barking and Dagenham, Thamesmead, Greenwich

What do you think the positive features of the location(s) you've selected are? Please enter your answer here:

Enfield is a historical location of Gypsy camps therefore additional culturally suitable accommodation for Gypsies and Travellers would definitely be an element to feature in Chase Park Cruise Hill placemaking. The hidden or overlooked Gypsy and Traveller history of London features in many testimonies speaking of past camps both authorised and unauthorised in our report We are Londoners Too:

<https://www.londongypsiesandtravellers.org.uk/wp-content/uploads/2017/03/We-are-Londoners-Too-Gypsy-and-Traveller-letters-report.pdf>

Enfield does not have any culturally suitable accommodation, and neither has neighbouring Barnet, therefore there is high unmet need for Gypsy and Traveller accommodation.

Developing several sites for 35 culturally suitable homes in the Thamesmead Waterfront New Town would be perfect because it is near both the existing and planned Gypsy sites, so the schools and other services will already be suited for Gypsies. The existing Thistlebrook site is massively overcrowded, and it already is the largest site in London (41 pitches). The Thamesmead area is also one of the historical locations of camps in SE London so definitely an element to feature in placemaking. Greenwich has an undersupply of 53 pitches.

South Barking is mostly in a high-risk flood zone so unless the ground is levelled up, it is not suitable for permanently placed caravans. However, it would be very suitable for a site for transient families who need to make a stop in London. Paris built two transit sites in the past decade -

<https://www.paris.fr/pages/une-aire-d-accueil-a-paris-pour-les-gens-du-voyage-4395#> - why couldn't London do so too, to meet the needs of nomadic ethnic groups?

8 Which of the 13 location(s) listed might face barriers which could hold back delivery of the New Towns Draft Programme objectives?

South Barking, Barking and Dagenham

What do you believe are the barriers to delivery in the location(s) you have selected? Please enter your comments here:

Flood zone in the areas of London outside the Thames Barrier. However there are flood-prone areas of London where the ground level was lifted up (by piling the rubble from WW2 bombsites) such as Hackney Marshes.

9 Do you think the SEA report has identified the main environmental issues relevant to the 13 locations?

No

Crews Hill and Chase Park, Enfield, South Barking, Barking and Dagenham, Thamesmead, Greenwich

If you selected no, please expand here and select which location(s) you are referring to from the list above:

In London, we are concerned that the New Town Principle of "ambitious density" could preclude the development of homes that are culturally suitable for Gypsies and Travellers. The typical design of social rented pitches yields the density of 35-65 dwellings per hectare. This is not below the density rate of developments (which are not specific to Gypsies or Travellers) approved in, say Bromley or Enfield, during the previous London Plan cycle. The density can be affected by site-specific designs, which are more adaptable in urban areas than in typical rural sites.

10 Is there any additional environmental information about these locations that the SEA should take into account?

Yes

If you answered yes, please tell us what additional information the SEA should consider:

Under the Population heading of the SEA, we applaud the ambition to reduce inequality and deprivation. We think that the plan for the New Towns in areas of deprivation such as Enfield should include proportions of social rented housing in line with the needs of the area. Moreover within the social housing bracket, the needs should be identified according to the demographic profile of the area, so that there are sufficient homes that are accessible to Disabled people, and suitable for large families, and for Gypsies and Travellers too, in an intersectional way. The success of plans for the New Towns should be measured against the Indices of Deprivation with location-specific targets rather than a general plan for 40% affordable housing. We draw your attention to the London deprivation map <https://trustforlondon.org.uk/data/index-multiple-deprivation-2019-rebased-london/> which shows the needs particularly in Enfield and Barking and Dagenham.

We would also like to highlight under the Historic Environment heading of the SEA, that not all histories are visible in material ways. Mostly, the powerful build monuments and the winners write the official history. Relating the New Towns to the historic environment is an opportunity to include intangible and overlooked history. London has only three very discreet public markers of Gypsy history: the Gypsy Stone in Epping Forest, which is a small eroded monument to a pastor and soldier, the Wardley Street Blue Plaque in Wandsworth, which commemorates a Victorian Gypsy encampment, and the Gypsy Cob on the Belvedere Horse Roundabout in Bexley. And yet we know that there are Travelling culture memories all over London, such as the Barnet Horse Fair, which are at risk of slipping into oblivion. Some of the historic events have been documented on community maps: <https://lgtheritage.communitymaps.org.uk/welcome>

11 Do you have any suggestions for practical mitigation measures to address any effects identified in the SEA report?

Yes

If you answered yes, please set out the practical mitigation measures that should be considered:

If an EDI impact assessment were conducted for all protected characteristics with regards to each New Town plan, and the allocation of funds were ringfenced for meeting specific pre-agreed EDI outcomes, then we would have a chance to reduce inequality (and thus increase societal resilience in the face of climate change effects).

12 Do you have any other feedback on the SEA report, including the issues and effects identified therein?

Enter your answer here:

Section 3.3 - Proposed New Towns Locations

13 Do you think the 7 locations proposed by the government are the ones most likely to meet the programme's objectives?

Yes

If you answered no, please set out why you think the proposed locations do not meet the programme objectives here:

We need 2000 additional Gypsy and Traveller homes in London immediately, to counter decades of catastrophic under-provision since the duty to provide culturally suitable accommodation was repealed in 1994. Our community members are looking to the central government to help address this shortfall which is having devastating social, economic and cultural consequences. Enfield and Thamesmead are especially suitable locations for sites that could meet some of the subregional needs, as they are on the outskirts of London. We are suggesting 75 culturally suitable homes in Crews Hill and Chase Park, and 55 culturally suitable homes in Thamesmead, in small developments, micro-communities of approximately 10 homes each. In South Barking, we propose a transit site for some 30 vehicles (according to the London GTANA, there is a minimum need for 87 transit pitches in the London region).

Section 4.1 - Government offer

14 Do you agree with the overall government offer for proposed new town locations?

Yes

If you answered no, is there any additional support you think should be offered? Please enter your answer here:

15 Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

Yes

If you answered yes, please set out the additional interventions government should consider:

Please set higher targets for social rented housing in areas of deprivation, with specified categories of types of housing according to the local or subregional demographic profile, taking into account all the protected characteristics, in an inter-sectional way. Further, we advise that the MHCLG adopt a definition of Housing Need that does not make assumptions about climbing the housing ladder or centres on profitability, for instance:

[H]ousing need is defined as 'the quantity of housing required for households who are unable to access suitable housing without financial assistance'. For the purposes of assessment, this means partnerships need to estimate the number of households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market. The types of housing that should be considered unsuitable are listed below:

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

(Adapted from

https://assets.publishing.service.gov.uk/media/5a790140ed915d07d35b41cb/Strategic_Housing_Market_Assessments-_Practice_Guidance.pdf , p.41)

Further, we recommend that the MHCLG adopt the human rights definition of cultural suitability:

A dwelling that is culturally unsuitable equates to housing need: Authorities will meet the accommodation needs of households living in Standard "bricks-and-mortar" housing whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

(Taken from DCLG 'Draft guidance to local housing authorities on the periodical review of housing needs -Caravans and Houseboats'

https://assets.publishing.service.gov.uk/media/5a808a48e5274a2e8ab50bb0/clause_115_draft_guidance.pdf)

And finally, we suggest that an additional accessibility criterion should use a clear definition of accessibility as a way to address mobility impairments as well as sensory impairments and neurodivergence, as recommended by the BSI standard Design for the Mind - Neurodiversity and the Built Environment (PAS 6463).

Section 4.2 - New Towns planning policy

16 How clear do you find the proposed planning policy?

somewhat clear

If you answered somewhat unclear or very unclear, which elements are unclear and how would you suggest changing them? :

17 Do you think establishing placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

Not sure

If you answered no, how do you think the placemaking principles should be implemented?:

There needs to be more depth and specification, or extensive cross-referencing to other planning policy documents where there is the necessary depth and detail.

18 Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

Not sure

If you answered no, what other measures could create a flexible approach to the placemaking principles? Please enter your answer here:

If local authorities sense "flexibility" in the duty to provide culturally suitable accommodation for Gypsies and Travellers, then they will renege on that duty.

19 Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?

No

If you answered no, what changes to the target are needed? Please enter your answer here:

It depends on the needs of the area. In London, social rented housing is the main type of tenure which is missing. We suggest that 100% of planned Gypsy and Traveller homes in the context of the New Towns be social rented.

20 Is the proposed planning policy on giving substantial weight in decision-making to the social and economic benefits of new towns clear?

Yes

If you answered no, please provide your reasons here:

Social, Economic and Cultural rights need to be met.

21 Do you agree with the government's approach to decision-making policy on the Green Belt?

Yes

If you answered no, what further changes to plan-making or decision-making policy needed to deliver sufficient clarity? Enter your answer here:

We welcome a cautious release of the Green Belt, especially in locations such as Thamesmead where the open space is not accessible and therefore does not fulfil the health benefits of Green Belt. We note that Gypsy and Traveller accommodation has a low impact on the Green Belt because it does not block the horizons, and does not require deep foundations. There are modern designs with green roofs and soft boundaries that can enhance biodiversity.

22 Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns?

Not sure

If you answered no, how could the policy statement go further? Enter your answer here:

23 Do you think any additional planning policies are needed to support the delivery of the programme objectives?

Not sure

If you answered yes, please provide details here:

Final questions

24 Do you have any views on any potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

Please provide comments here:

Our community members are hopeful that the New Towns will include long-awaited provision of decent and sufficient culturally suitable accommodation for Gypsies and Travellers. Gypsies and Travellers have some of the worst health and educational indicators in the UK, and many analysts link these poor outcomes to the lack of accommodation which effectively erases an entire cultural way of living.

25 Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?

Enter your answer here:

There is research into the connection between unsuitable accommodation, the experience of racist bullying and discrimination, and poor mental health among Gypsies and Travellers. (Nevertheless, scientifically, the relationship between the two is a correlation. Causation would have to be examined in a project such as yours.) Here are some sources:

The 2021 Census found that those who identified as Gypsy or Irish Traveller were more than twice as likely to report bad or very bad health (12.5%) compared with the England and Wales population (5.2%). 15% of people who identified as Gypsy or Irish Traveller who lived in flats, maisonettes or apartments reported bad or very bad health. 11.7% of people who identified as Gypsy or Irish Traveller who lived in caravans or other mobile structures reported bad or very bad health (only in this category of accommodation is the rate of ill-health of Gypsies and Travellers roughly in line with the general population's rate (10.6%)).

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsyoririshtravellerpopulationsenglandandwales/census2021#general>

The correlation between higher rates of bad health and living in "bricks and mortar" housing compared to rates in caravans is complex, but the relationship is sometimes seen as causal, see below.

Friends, Families and Travellers calculated on the basis of the Government Caravan Count that 10,000 Gypsies and Travellers living a nomadic way of life in England had no places to make stops as a result of a chronic national shortage of sites, and this hidden homelessness impeded their access to healthcare. 2022,

https://www.gypsy-traveller.org/wp-content/uploads/2025/03/Briefing_Health-inequalities-experienced-by-Gypsies-and-Travellers-in-England-2.pdf

The NHS Race & Health Observatory linked Gypsies and Travellers' poor health to accommodation: "Van Cleemput (2007) has also highlighted the impact of accommodation on health, stating that while it might seem of benefit to move into housing for easier access to support and services, 'the psychological impact of giving up a travelling lifestyle and the potential 'culture shock' can counteract this perceived benefit.' (Van Cleemput, 2007, p. 111). Van Cleemput's (2010) research went on to state that the 'threat to the travelling way of life...was strongly associated with a negative health impact.' (Van Cleemput, 2010, p. 316)." September 2023, p.23,

<https://www.nhs.uk/rho/wp-content/uploads/2023/05/Inequalities-in-mental-health-care-for-Gypsy-Roma-and-Traveller-communities.pdf> The same report found suicide rates seven times the national average. There have been several suicides on Lynton Close site in recent years - the community is grieving.

The University of Worcester together with DDPO and GRT organisations found that there was a culture of communal care on Gypsy and Traveller sites for people with physical disabilities (and the ONS figures showed that this care is carried out in a gendered manner), combined with a culture of stoicism. Communal care was less effective for people with mental health needs. The culture of care was sometimes used by local housing officials/organisations as an excuse to not provide reasonable adjustments to site amenities on council-run sites; see December 2020, p.19,

<https://www.drilluk.org.uk/wp-content/uploads/2020/12/Missing-Voices-FINAL-report.pdf> Friends, Families and Travellers found that Gypsies and Travellers with learning disabilities felt supported in their communities, 2018,

<https://www.gypsy-traveller.org/wp-content/uploads/2025/03/Research-on-learning-disabilities-in-Gypsy-and-Traveller-communities-May-2018-2.pdf>

The Court of Appeal in the case Smith v Secretary of State for Levelling Up, Housing & Communities & Anor [2022] EWCA Civ 1391 judged in November 2022 that the government's 2015 definition of Gypsies and Travellers used in planning policy unlawfully discriminated against Gypsies and Travellers with regards to age and disability. <https://gardencourtchambers.co.uk/governments-planning-definition-of-gypsies-and-travellers-unlawfully-discriminatory/> The definition was consequently changed in December 2023 (and again in December 2024). The Equality and Human Rights Commission found in 2019 that the discriminatory definition had constrained the planning for Gypsy and Traveller specialist housing by 75% in local planning authorities.

<https://www.equalityhumanrights.com/our-work/our-research/gypsy-and-traveller-sites-revised-planning-definitions-impact-assessing-0> and <https://www.equalityhumanrights.com/disabled-elderly-and-ill-gypsies-and-travellers-forgotten-site-provision>. The expected revision of all plans that had been made based on the discriminatory definition in force between 2015 and 2023 has not occurred.

There has been no additional Gypsy or Traveller site built in London since 1996, at least four council-run sites have been closed (two in Enfield, one in Lewisham and one in Camden), and there has never been a permanently authorised place for transient nomadic families to make a stop in Greater London. Community members have told us that the closest location of available transit pitches is Bournemouth.