

London Gypsies and Travellers submission to GLA consultation on “Towards a new London Plan”

20 June 2025

In 2021, London Gypsies and Travellers welcomed the London Plan's endorsement of the inclusive definition of Gypsies and Travellers, in contrast to the discriminatory definition that was then applied in national policy. Now that national policy has improved in that regard, following the judgment in *Smith v Secretary of State for Levelling Up, Housing & Communities & Anor* [2022] EWCA Civ 1391 (the London Mayor was on the right side of history in the matter of defining Gypsies and Travellers, not to mention on the right side of the law), we recommend that the new London Plan adopt the most progressive definition that is currently on the books:

“Gypsies and Travellers means:

- (a) Persons of a nomadic habit of life, whatever their race or origin, including –
 - (i) Persons who, on grounds only of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently, and
 - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such); and
- (b) All other persons with a cultural tradition of nomadism or of living in a mobile home.

3. The intention of the above definition is to ensure that ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers,” Welsh Government, Circular 005/2018, June 2018,

<https://www.gov.wales/sites/default/files/publications/2019-05/planning-for-gypsy-traveller-and-showpeople-sites-wgc-0052018.pdf>

In addition to the method that calculates capacity for increased housing density, London Gypsies and Travellers advocates for evidence of housing need to be also calculated on the basis of fulfilling the human rights to adequate housing including with regards to cultural suitability of housing, and to be free from discrimination. Additional evidence, based on local studies of community needs, would enable a strategy for developing London for Londoners. One suggested method for such evidence would be a definition of housing need that encompasses all the aspects of affordability that were addressed in previous Strategic Housing Market Assessments, for instance:

Definitions: Housing Need

[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)

AND ALSO:

6. Cultural unsuitability: 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)

These definitions, as a basis for high-quality evidence, would ensure that the GLA leads in a strategic vision that reflects the needs of all Londoners, without discrimination, and furthermore place London as a model to emulate when London Gypsies and Travellers and other housing campaigners call for a standardised method for conducting high-quality research for evidence-based policies including research for Gypsy and Traveller Accommodation Needs Assessments.

We emphasise the requirement to co-produce research and plans with the communities most affected by planning policies, in our case, London's Gypsies and Travellers. Co-production is complementary to consultation and in fact enhances the inclusivity of policy consultations.

London Gypsies and Travellers is gravely concerned that the structure of London's housing market and housing type and tenure distribution discriminates along the lines of race and disability. Numerous studies by housing experts provide evidence of racial discrimination and offer steps to be taken by regional authorities to rectify the inequalities, including policy recommendations by the UN Committees for the Eradication of Racial Discrimination and on Economic, Social and Cultural Rights. London Gypsies and Travellers and other community groups note that the UN Committee on Economic, Social and Cultural Rights described "adequate" housing as having the following elements in terms of available services, materials, facilities and infrastructure: "An adequate house must contain certain facilities essential for health, security, comfort and nutrition. All beneficiaries of the right to adequate housing should have sustainable access to natural and common resources, safe drinking water, energy for cooking, heating and lighting, sanitation and washing facilities, means of food storage, refuse disposal, site drainage and emergency services." Moreover, "The way housing is constructed, the building materials used and the policies supporting these must appropriately enable the expression of cultural identity and diversity of housing. Activities geared towards development or modernization in the housing sphere should ensure that the cultural dimensions of housing are not sacrificed, and that, inter alia, modern technological facilities, as appropriate are also ensured." UN Committee on Economic, Social and Cultural Rights, General Comment 4: The right to adequate housing (Article 11 (1) of the International Covenant on Economic Social and Cultural

Rights), 13 December 1991,
https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCESCR%2FGEC%2F4759&Lang=en , para 8(g). Our organisations have found that much of the accommodation that Gypsies, Roma and Travellers live in, in London, largely did not meet these standards, and members of these groups are disproportionately driven to homelessness.

There are some 40,000 Gypsies and Travellers living in London and 38,000 Roma, and though these communities are relatively small in numerical terms, the multiple challenges they face are enormous. In the context of Gypsy, Roma and Traveller social exclusion, members of these communities suffer suicide rates many times higher than the national average. London Gypsies and Travellers and Roma Support Group propose that resolving the shortage of decent social housing, of which a proportion be culturally suitable accommodation, is the keystone for building a path out of decades of discrimination.

We are asking that the London Plan aim to redress decades of under-provision of social rented housing, so as to increase the total proportion of social rented housing in London to a target of 35% of the total housing stock in London (both new and existing), of which 1% constitute caravan pitches on council-run communal Gypsy and Traveller sites. In line with the focus of the London Housing Panel, of which London Gypsies and Travellers is a member, we look to London's policy-makers to meet the desperate need for more good quality social rented housing in the capital. By good quality we mean homes that are safe, warm and accessible at a price that people on low incomes can afford.

We have found that local and regional authorities are not taking sufficient steps to address the root of the problem, by improving provision of social housing, and are also not delivering homelessness services to the necessary standard. The only local authority in London to utilize the government's Traveller Site Fund was the Royal Borough of Kensington and Chelsea, which spent £78,909 (USD 100,143) in 2022 on refurbishing a communal space at the Stable Way Traveller Site, though the residents had asked for the site to be expanded so as to accommodate additional caravans. Stable Way Site was overcrowded and wedged under a dual carriageway overpass where seven major roads and a railway line intersect. £485,000 (USD 615,513) from the available fund were not spent at all.

We ask that funding be ringfenced to meet the targets for social rented housing, including by penalising developers who do not deliver the housing that they are contracted to build within 5-year timeframes.

Additionally, we call on the GLA to:

- Establish sites in the four corners of London that will accommodate at least 40 pitched caravans for short-term stays.
- Lead on the formation of regional negotiated or permitted stopping arrangements so as to accommodate nomadic Gypsy and Traveller families in caravans.
- Introduce a moratorium on evictions of nomadic Gypsy and Traveller families until there are sufficient permitted stopping places.

Accommodation for nomadic families by definition needs cross-boundary co-operation. London Gypsies and Travellers and other community groups call for a nationally standardised method for high-quality research on Gypsy and Traveller Accommodation Needs Assessments, such as the research conducted by the the Sustainable Housing & Urban Studies Unit at the University of Salford (SHUSU). The SHUSU regularly produces Gypsy and Traveller Needs Assessments, see for instance Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment for Telford & Wrekin Council, November 2014, https://www.telford.gov.uk/download/downloads/id/4432/c2f_gypsy_traveller_and_travelling_showpeople_accommodation_needs_assessment_twc.pdf [opens PDF].

Alongside other community groups, we call for the regional introduction of Negotiated Stopping approaches, which have been shown to be successful at accommodating nomadic families in accordance with their needs, reducing inter-communal tensions, and also saving local authority funds and other resources that are wasted on short-lived and harmful enforcement measures. See evidence presented here:

<https://www.negotiatedstopping.co.uk/>

We also join other housing campaigners in calling for the government to:

- Reform the regulation of the rental sector so that affordability, decent accommodation standards, and security of tenure are instituted without discrimination on racial grounds.

- Ensure that housing provisions allow for temporary accommodation to be accessed only as a last resort and within the statutory limits.

Para 2.10: Development in the Green Belt

London Gypsies and Travellers looks to the GLA to set a regional strategy that would pragmatically redistribute part of the needed supply of Gypsy and Traveller pitches from the inner boroughs towards the outer boroughs, in co-ordination with the communities affected. "Greybelt" lands are typically locations that do not contribute to the purposes of the Green Belt and also locations that Gypsies and Travellers have often, historically, made into homes. London Gypsies and Travellers advocates for caution in the deregulation of planning in Green Belt (and MOL) areas, noting that Gypsy and Traveller sites in their modern designs do not disrupt the character of the Green Belt, because they do not obstruct the horizon and can be designed to increase local biodiversity, and to blend in with green surroundings (see <https://movingforchange.org.uk/our-resources/the-modern-nomad/>), and so should be viewed as suitable development in the Green Belt where standard housing may not be suitable.

In relation to developments in the Green Belt, we note with emphasis that the amended NPPF specifically favours demonstrable five-year supplies of deliverable Gypsy and Traveller sites. See Para 155 of the NPPF (Feb 2025 amended version):

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed > leading to footnote no. 56

Footnote 56 says:

Which [...] in the case of Traveller sites means the lack of a five year supply of deliverable Traveller sites assessed in line with Planning Policy for Traveller sites.

Para 2.12: Affordable housing

The London Plan provides an opportunity to increase planning for access requirements across all disability and impairment types so that all residents can safely and easily use basic facilities like kitchens, bathrooms and entryways in all types of housing tenures.

In the interest of accessibility and inclusivity, the GLA could consider applying a clear definition of accessibility to planning for affordable housing in general and social rented housing in particular, 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).

London Gypsies and Travellers, as a member of the London Housing Panel, calls for social rented housing to be prioritised instead of "affordable housing", up to a target of 35% of all housing stock in London, and within that priority, for targets to be set for delivering a 10% proportion of accessible housing and also, in an inter-sectional way, a target of 1% of social rented accommodation that is culturally suitable for people of nomadic culture and heritage such as Gypsies and Travellers who need to live on pitches in communal sites.

Para 2.19: Gypsies and Travellers

In light of the chronic and catastrophic shortage of culturally suitable accommodation for Gypsies and Travellers as people with a heritage and culture of nomadism, we turn to the GLA to use the London Plan to lead on a regional strategy setting targets for rectifying decades of discrimination, especially in light of the changed NPPF which favours a demonstrated five-year supply of deliverable Gypsy and Traveller sites. The targets should be based on high-quality evidence using thorough methods that are co-produced with the people most affected by the policies, in this case London's Gypsies and Travellers. In relation to the evidence, we note that London Gypsies and Traveller and other community groups have raised serious concerns about the flaws of the Gypsy and Traveller Accommodation Needs Assessment (GTANA) that has been drafted to support the new London Plan.

High-quality evidence should form the basis of setting targets, moreover we look to the GLA to set a regional strategy that would pragmatically redistribute part of the needed

supply of Gypsy and Traveller pitches from the inner boroughs towards the outer boroughs, in co-ordination with the communities affected. "Greybelt" lands are typically locations that do not contribute to the purposes of the Green Belt and also locations that Gypsies and Travellers have often, historically, made into homes. London Gypsies and Travellers advocates for caution in the deregulation of planning in Green Belt (and MOL) areas, noting that Gypsy and Traveller sites in their modern designs do not disrupt the character of the Green Belt, because they do not obstruct the horizon and can be designed to increase local biodiversity, and to blend in with green surroundings (see <https://movingforchange.org.uk/our-resources/the-modern-nomad/>) , and so should be viewed as suitable development in the Green Belt where standard housing may not be suitable.

In order to accommodate nomadic families and respect their human rights to adequate housing, which by definition includes cultural suitability, and to being free from discrimination, the London Plan should make it compulsory to meet existing needs for permanent as well as transit Gypsy and Traveller sites. Transit sites should be planned regionally, in the four corners of London, to accommodate at least 40 nomadic households at any one time (a figure proposed by the 2008 London GTANA), for affordable booking or rental fees comparable to established practice for instance in Dorset or in France.

Additionally, we ask the GLA to lead in establishing a Negotiated Stopping approach in the region, for instance by setting up negotiated protocols on GLA-owned land and land that is awaiting development, rather than only recommending the approach at local level, as the 2021 London Plan did. The region-wide approach has been successfully implemented for more than a decade in Leeds, and Birmingham has also recently committed to introducing Negotiated Stopping. See further evidence and practical resources at: <https://www.negotiatedstopping.co.uk/>

We note that in the context of poor environmental conditions of existing Gypsy and Traveller sites in London, and of the social exclusion and disadvantages in health, employment and education experienced disproportionately by members of Gypsy and Traveller communities, the design principles of new Gypsy or Traveller pitches should include accessibility. The London Plan 2021 has useful criteria to assess the quality of design and maintenance, however there should be an additional criterion using a clear definition of accessibility to planning for pitches and sites 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).