London Gypsies and Travellers' submission to the GLA consultation on the new draft London Plan

13 October 2026

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The new draft London Plan is not sound

London Gypsies and Travellers, a small charity that works with Gypsies and Travellers to advocate for their rights and achieve equitable social outcomes in London, welcomes the new draft London Plan which includes minimum targets for culturally suitable homes in each borough, for the first time. We also welcome the new inclusion of a figure for transit sites that would accommodate households pursuing nomadic ways of life. These two improvements are foundations for rectifying decades of neglect and systemic discrimination in planning for some of the most socially excluded and publicly underserved communities in London. However, in the plans for building a taller, denser,

LONDON GYPSIES & TRAVELLERS

more efficient and accessible city, homes for Gypsies and Travellers need protections so they are not left as pockets of deprivation in hazardous living conditions.

The new draft London Plan fails the test of soundness on two grounds:

1) It is not positively prepared, because the London Gypsy and Traveller Accommodation Needs Assessment 2025 (London GTANA 2025) is flawed in its methodology. Detailed explanation on how the London GTANA 2025 is wrong, and how it could be corrected, is below.
2) It is not consistent with national policy, in particular NPPF 2026 L3.2.c.ii, which requires that an exception be made to dwelling density minimums in the vicinity of well-connected stations, specifically for Gypsy and Traveller sites. Accordingly, amendments to policy MBUL2 Optimising the use of land and site capacity are set out below.

The new draft London may also fail to meet legal requirements under the Public Sector Equality Duty, the Human Rights Act 1998, and the Equality Act 2010, in that it does not sufficiently plan to safeguard Gypsies and Travellers from homelessness. At present, according to Trust for London periodic reports on homelessness, compared with findings of the London GTANA 2025, Gypsies and Travellers are ten times more likely to be in non-self-contained homeless shelters than other Londoners. Gypsies and Travellers also endure community-specific types of hidden homelessness, such as overcrowding (reported in ONS figures), and living in caravans that have no authorised or even tolerated location to be parked (according to the annual government caravan count). The amendments proposed in this submission are written for the aim of reducing all types of homelessness, whether in Gypsies' and Travellers' culturally suitable accommodation or in bricks-and-mortar "conventional" housing, bearing in mind that so many of our community members rely on social rented housing.

Amendments and additions are in red, under each policy heading, below, together with an explanation for the effect on Gypsy and Traveller community members, if the amendment is not made. The effect on our communities is further evidenced by eight letters to the Mayor of London regarding the housing policies of the London Plan. We urge the planning authorities to include lived experience expertise in the evidence base for all policy making.

Availability for Examination in Public

The CEO of London Gypsies and Travellers, Ms Deborah Kennett, is available to speak at the Examination in Public, as is the Policy and Research Officer, Dr Nancy Hawker. Our organisation also supports our community members to represent themselves at public meetings, if they need support (for instance with digital access and literacy).

1) Policy MBUL2 Optimising the use of land and site capacity

Plan making

A Plan-making authorities should plan for growth and make the best use of land in line with Box MBUL2, taking full advantage of existing and planned levels of sustainable transport connectivity and allowing character to evolve by:

(1) developing strategies, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant**, such as creating inclusive and accessible neighbourhoods where cohesive, culturally diverse, socioeconomically mixed, and intergenerational communities thrive**) for areas where a more pro-active approach is required to promote development. These should have regard to the Optimisation Framework in Table 2.1 and ensure that minimum net densities are met or exceeded

(2) where appropriate, undertaking or updating character studies to understand local character in more detail. This could include enhancing the precision of the London Context Map and adjusting the setting applied to a particular location based on detailed local knowledge. These studies should not preclude change, especially where an increased scale or density of development is expected in accordance with box MBUL2

(3) Particular locations that host Gypsy and Traveller sites, both existing and planned, are exempt from the increased density requirements (NPPF 2026 L3.2.c.ii). Rather, there is separate national Planning Practice Guidance (forthcoming) on culturally suitable site design that makes effective use of land for Gypsies' and Travellers' homes.

(4) where they consider necessary, building on the London Small Site Design Code in a local design code. In doing so this should not deviate from the overall scale and ambition set out in the London Small Site Design code or undermine development viability through additional requirements or constraints.

[...]

Development Management

C All development should with reference to Box MBUL2, optimise the use of land in line with the spatial strategy set out in MBUL1, while responding to the site's specific context and constraints. This means:

(1) development should be informed by the relevant density and height ranges in the Optimisation Framework where applicable (see Box MBUL2). Residential development should achieve the minimum densities stated in the Optimisation Framework, unless site specific constraints limit the development potential of the site**, such as use for culturally suitable accommodation for Gypsies and Travellers**. Development that

complies with the Optimisation Framework should be supported in terms of height and density

Rationale: The new draft London Plan aims to deliver a taller, denser London interspersed with and surrounded by public green spaces, and where everyone can use accessible, efficient and low-carbon public transport. This is a good vision which we generally support. However, one of the unintended consequences of the vision is to prohibit development of single-storied homes such as those that are culturally suitable for many Gypsies and Travellers. Such a rule would preclude the formation of inclusive, diverse neighbourhoods. This omission is rectified in the NPPF 2026. In order to be in conformity with NPPF 2026, the new London Plan needs to make an exception to the density rule for the benefit of planning and protecting Gypsy and Traveller sites, where the density is typically around 50 dwellings per hectare.

2) MBUL3 Tall Buildings

Where tall buildings are located next to single-storey housing, the side of the tall building that is overlooking a Gypsy or Traveller site, for instance, should comprise frosted glass windows or stairwell windows, so as to protect privacy of the households living below. The overlooking can also be mitigated by trees that grow upright such as cypress and Lombardy poplars.

Rationale: Trees that have spreading canopies are not suitable for shielding a Gypsy or Traveller site because branches that fall in a storm damage the caravan roofs.

3) MBUL7 London's Heritage

Plan-making

B LPAs are encouraged to develop local heritage strategies which capture and harness the benefits of local heritage and its contribution to a diverse cultural offer. Their production should be informed by evidence and involve collaboration between Boroughs, stakeholders and communities. **The local heritage identified will include intangible cultural heritage, as defined by UNESCO: "Intangible cultural heritage includes the practices, knowledge, and expressions that communities recognise as part of their cultural identity, along with associated objects and spaces. Transmitted through generations, this heritage adapts over time, reinforcing identity and respect for cultural diversity." The 2003 UNESCO Convention emphasises the need to safeguard these cultural expressions for future generations, and covers these five domains: oral traditions such as storytelling, performing arts such as traditional dances, social practices such as rituals, knowledge about nature and the universe, and traditional craftmanship.**

Rationale: Peoples with oral traditions and nomadic ways of life such as Romany Gypsies and Travellers have contributed, and continue to contribute, to the culture of

London without leaving many tangible traces. There is one blue plaque in Wardley Street, Wandsworth, commemorating Gypsy residents. Nevertheless, this culture is known and alive, albeit hidden to the majority, who therefore cannot appreciate the diversity of urban social practices, while minority groups are unrecognised and feel undervalued. The Barnet Horse Fair, for example, took place annually until the 21st century, but is now discontinued for lack of affordable space, while the Gypsies' pony ride through London still takes place running through central London, in an uncelebrated manner.

4) HN3 – Delivering affordable housing

(3) ~~follow the Threshold Approach to Planning Applications as set out in the development management section of this policy for referable and non-referable planning applications~~ **all new large scale developments (counting more than 35 dwellings) on public land should comprise 50% social rented accommodation, of which 1% Gypsy and Traveller pitches, in line with pitch targets in policy HN4;**

(4) large scale developments on non-public land should comprise 35% social rented accommodation;

(5) smaller developments that are 100% socially rented, including Gypsy and Traveller sites, should be given significant weight in planning processes;

(6) draw up and publish allocations policies**, also for social rented Gypsy and Traveller accommodation,** and maintain housing registers for intermediate homes, alongside any other measures considered necessary to ensure fair and transparent allocation for intermediate homes;

Rationale: The Plan recognises the exceptionally high level of affordable housing need, including the need for 238,430 low-cost rented homes and 129,020 intermediate homes by 2037, and this recognition is welcome. However, the 50 per cent strategic target should become a more immediate delivery objective, rather than an ambition deferred to the longer term. Social rented housing should be prioritised, of which new Gypsy and Traveller accommodation should be approximately 1% in all locations, because if the threshold amendments suggested are accepted, while retaining the draft London Plan's overall figure of new housing, then 1% of all new social rented housing (as 35-50% of 55,800 new homes p.a.) would equate to 976-1395 new social rented pitches over five years. The figure of 1000 new social rented pitches comes closer to the figures of need calculated below which amount to 3,203 pitches in the first five years. Without this prioritization of social rented housing, London's homelessness crisis will only worsen, and affordability problems will drive families with children out of London, affecting whether communities can thrive, and undermining equitable prosperity in the longer term. The most acute housing shortage is in the category of social rented homes that

meet locally specific accessibility, cultural suitability, and family size needs, and this need should be prioritised over other tenures. The aim should be a London where a third of the housing stock is social rented, in the locations where social tenants are on interminable waiting lists.

5) HN4 – Gypsy and Traveller accommodation

Plan-making

A Plan-making authorities should seek to meet the needs of London's Gypsy and Traveller and Travelling Showpeople communities and should:

(1) adopt the targets set out in Table 3.4 and Table 3.5 as a minimum

(2) make provision for other types of culturally suitable accommodation where there is a need

(3) consider granting permanent permission for temporary sites where these are in suitable locations

(4) identify areas of potential extra capacity within or adjacent to existing sites **in each local plan review cycle**

(5) provide pitches or plots and other culturally suitable accommodation as part of large scale residential and mixed-use allocations and regeneration proposals ~~where there is scope to do so~~ **that are located in areas with unmet need for Gypsy and Traveller accommodation**

(6) identify pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping) with methodical identification of refurbishments and other improvements occurring every 5-10 years, to the same quality as the Decent Homes Standard.

(7) conduct fire safety inspections of caravan sites annually, bearing in mind that certain types of caravans are highly flammable, and where habitation density is 50 dwellings per hectare or more, install firebreak measures such as amenity blocks and walls made of fire-retardant materials, with interconnected heat detectors linked to sprinklers

(8) if, as a result of identifying hazards to life and limb according to Decent Homes Standard criteria or fire inspections, it is necessary to temporarily relocate residents of Gypsy and Traveller sites, then a temporary caravan site with basic amenities should be provided so that the emergency accommodation is culturally suitable.

B LPAs should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping**, with the GLA making available TFL and other GLA-owned land that is safe and suitable, in the first instance, for stopping places.**

C LPAs are encouraged to work collaboratively with providers, community organisations and the GLA with the aim of securing provision for and delivery of permanent pitches, plots, transit sites and other culturally suitable accommodation.

Development management

D Development proposals that would entail the loss of Gypsy and Traveller pitches and Travelling Showpeople plots should secure replacement provision that is equivalent or better in terms of size, quality and suitability of location**, and this provision should be ready for residents before they are asked to move out of their existing homes**.

E Where existing Gypsy and Traveller pitches or Travelling Showpeople or Circus People's sites or plots have to be re-located or re-provided, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible.

F Development proposals for new sites should ensure sites will be well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

G Pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for all, including disabled and older people, and families with young children.

(1) air and noise pollution should be taken into account when planning new culturally suitable homes, where outdoor communal spaces are the norm for daily activities. Mitigation measures such as sound barriers, dust filters (e.g. cypress tress), and speed bumps should be installed.

(2) all new amenity blocks should be wheelchair accessible, and the adaptations proposed for homes of people with disabilities should include sensory impairments, neurodivergence and mental health conditions, such as traffic noise and light suppression, and child-safe windows and site gates. 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).

H Gypsy and Traveller accommodation assessments in London will be based on the definition:

> **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.**
>
> **According to the Welsh Government, the intention of the above definition is to "ensure that ethnic Romany 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."**
>
> **(see 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)**

Rationale: Pitch targets set as minimums are welcome. In the enclosed comment on the London Gypsy and Traveller Accommodation Needs Assessment (the London GTANA 2025), it is explained why the targets listed represent absolute minimum need. See document "Method for Using Accurate Population Figures and Cultural Housing Need Rates in The London-Wide Gypsy & Traveller Accommodation Needs Assessment" prepared by London Gypsies and Travellers. The flaws of the London GTANA 2025 mean that the London Plan is unsound due to not being positively prepared.

Meeting diverse needs where they are, is optimising

The Plan should ensure that the emphasis on land optimisation and density does not undermine the ability of boroughs to deliver the required pitches. An exception to the density rules should be made to protect existing sites and to allow development of new culturally suitable accommodation, including near train stations.

Relocation sites ready before any existing ones close

Just as for other social housing, existing and planned council Gypsy and Traveller sites should be protected from re-development. When existing provision is redeveloped, new

culturally suitable homes of equal or better quality, should be ready for habitation before any Gypsies and Travellers are relocated out of their existing homes.

Accessibility of Gypsy and Traveller sites

Gypsies and Travellers suffer from high rates of disability, neurodivergence, and chronic mental health conditions, according to the ONS and the NHS Race Observatory. The effects of the health situation can be attenuated by appropriate planning, design, and development implementation.

Gypsy and Traveller sites are green

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 GB3.3 of the NPPF 2026:

> *3. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should be specifically allocated in the development plan as a traveller site only.*

And GB7 "Development which is not inappropriate in the Green Belt", NPPF 2026, and its footnote 41:

> *1. The following categories of development are not inappropriate in the Green Belt, and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances [...] g. Development where all of the following apply:*
>
> > *i. 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;*

ii. There is an evidenced unmet need for the type of development proposed > [footnote 41] > which in the case of traveller sites means the relevant local planning authority cannot demonstrate a five year supply of deliverable traveller sites.

Transit accommodation

To prevent the forced assimilation of households following nomadic ways of life, the London Plan should make it compulsory to meet transit accommodation needs. Transit sites should be planned regionally, in the outer boroughs of London, where 87 transit pitches are a minimum, translating into 4 or 5 transit pitches in each of the 20 outer boroughs. These pitches would pay for themselves by requiring affordable booking or rental fees comparable to established practice for instance in Dorset or in Paris.

Additionally, we ask the GLA to lead in establishing a Negotiated Stopping approach in the region, for instance by setting up negotiated protocols on TFL and other GLA-owned land. The region-wide approach has been successfully implemented for more than a decade in Leeds. Portsmouth and Durham have also introduced Negotiated Stopping. See further evidence and practical resources at: https://www.londongypsiesandtravellers.org.uk/news/2019/12/04/new-lgt-report-on-negotiated-stopping-in-london/ and https://www.negotiatedstopping.co.uk/

Community engagement and evidence from lived experience

Finally, we also ask the GLA as well as all policymakers to recognise the value of community engagement as a precondition for successful and meaningful consultation. Enclosed with this representation are eight recent letters from Gypsy and Traveller Londoners who are experts on the policies that affect them, through lived experience. Their testimonies underline the urgency of the need to meet pitch targets, establish accommodation for nomadic households, make infrastructure and housing accessible to people with all types of impairments, conditions and disabilities, and the great distress resulting from the combination of homelessness and cultural loss. We urge you to include lived experience in the evidence base for the London Plan.

6) HN9 – Accessible housing

Gypsy and Traveller amenity blocks should all be wheelchair accessible or adaptable, and ramps for wheelchairs should be provided where necessary for other infrastructure on Gypsy and Traveller sites.

7) Chapter 4 – Good Growth

GLE1 Sufficient and appropriate employment space

Add point B, reading

Plan-making authorities must protect and promote activities that sustain equitably distributed prosperity, with the aim of creating conditions for improved health outcomes in all demographic groups, including mental health.

GLE7 Affordable workspace

Support affordable workspace for charities and community organisations, including youth groups and community food providers.

GLE8 Access to employment and skills

Create opportunities for apprenticeships or other skills development for young people not in education, employment or training.

EVIDENCE FOR THE NEW DRAFT LONDON PLAN EXPERTISE FROM LIVED EXPERIENCE: LETTERS FROM LONDON'S TRAVELLERS AND GYPSIES

October 2026

105 Camden Street

Pitches1-4

London NW1 OHS

12 October 2026

Dear Sadiq Khan,

We wrote to the Mayor of London when it was Boris Johnson, in 2009, about his London Plan for Gypsies and Travellers. Back then the plan said that Camden needed 6 new pitches and we told Boris Johnson: "This will not even be enough new pitches for our own sons and daughters and grandchildren who desperately need a site to live on because they do not want to move into houses. We have been on the road all our lives, this is our tradition and is the only life we knew and we want to continue this by staying on sites. When Traveller families are forced to move into houses it really affects them in a lot of ways. Travelling people are used to visiting one another and always keeping in touch with each other. Houses make people very isolated and causes people to get depressed." That was 17 year ago and not a single pitch was built since then, in fact the Council closed three pitches up in Kentish Town. The families got bigger, and we are still on our Council site in Camden Town, ever since we arrived in London from Dublin in 1987. We are still overcrowded, and all our caravans are still very squashed together, just as we wrote back then.

We are writing to you about your London Plan now, which says the number of new pitches needed for Camden is 11. Now, if we just count the Traveller families in Camden who are in houses because they have no choice, that is 18 families from the Maughans, the Powers, and the Maloneys, that we know about, and there may be more. All them children are stuck in the houses, they don't know how to live with us on sites no more, and they don't know how to behave by our culture, and they don't know they are Travellers. They be looking at their screens all the time of day, which we are against, because we see how down they are, with their mental health. In the old days, children

were outside, playing football and learning how to be polite and respectful to all our guests. The number of pitches in the London Plan needs to be the true and correct number, we are asking you for the young ones coming up.

We urgently need new sites. Our daughter was married when Boris Johnson was Mayor, and she be in temporary accommodation these nine year, raising three little boys in one room, and they have conditions where they need care day in day out, bless them. And we could give them that care on a site, though she come down to us every day, it should be easier for the children than what it is. If Boris Johnson had built the pitches as he said back then, our daughter she wouldn't be in this predicament now.

Your London Plan doesn't say that we can keep our site while the new sites are built for the young ones. Please put that rule in for us, that the new sites should be ready to move into before any old sites are closed, because the Council always takes longer to do anything than what they say, and we can't be in houses for any length of time.

Yours sincerely,

John and Margaret Maughan, together with daughters Mary and Margaret-Josephine



Children living roadside in Hackney, London Fields, 1987 © Colin O'Brien

12 Parkway Crescent
London E15 1AB

Sadiq Khan
Mayor of London
Draft London Plan
London Plan Team
Planning & Regeneration, City Hall
Kamal Chunchie Way
London, E16 1ZE

15th October 2026

Dear Mayor Sadiq Khan

I am writing as an English Romany Gypsy living on Parkway Crescent, which is a council site in Newham. I have lived here with my family since we were moved in 2007 because of the London Olympics. Back in 2009 I wrote to the Mayor Boris Johnson about how Gypsies and Travellers all over London are desperate for more pitches. I am writing to you now, about the draft London plan and policy HN4 where it talks about accommodation for Gypsies and Travellers in London.

When I wrote in 2009, I had 3 children. I now have 7 children and 5 grandchildren, all living with me on the same plot. We are very overcrowded and there is no room. There is a huge need for more sites for the younger generation, and this really worries me for my children and grandchildren because they have nowhere to live. I also have a son who is severely autistic and has mobility and learning difficulties, so our family needs to be close together to look after him as he gets older. This really worries me a lot. I understand that the plan says that Newham needs to build 34 new pitches over the next 10 years. We really need this to happen urgently because Newham council hasn't built any new pitches for over 40 years. This is why there is so much overcrowding, and we really can't wait any longer.

I also said in my letter 17 years ago, that there is no proper waiting list in Newham for pitches. My children are trying to get their names on the list because they now have

children and need their own homes, but they can't get any right information from the council.

We feel that the needs of our community have been ignored for so many years. I am asking for you to not ignore us any longer.

If I am invited to speak more about this, I would be happy to do so.

Thank you for reading this.

Yours sincerely,

Esther Smith

Living roadside/ no fixed abode

Sadiq Khan

Mayor of London

Draft London Plan

London Plan Team

Planning & Regeneration, City Hall

Kamal Chunchie Way

London, E16 1ZE

12th October 2026

Dear Mayor Khan

I am a Traveller with three kids who is living roadside. I am writing to you about your draft London Plan and the part about Gypsy and Traveller accommodation.

My family have been campaigning for over 15 years for a site. We are campaigning with the London Renters Union in Newham to have a site built there. Moving borough to borough is affecting mine and my kids' health. My kids have no proper access to education and healthcare. We experience a lot of discrimination, and Newham Council won't open the doors we need. We just want to get on with our lives like any other normal family. We want to put our kids in school and be part of normal society and just live our lives in peace and dignity. We wanted to put forward our testimonies so that you know there are people stuck on the side of the road in caravans and in situations where they have nowhere to go.

This is why we are asking you to make sure you keep the minimum numbers for pitches in your plan – so that Councils have to provide for us and deliver the pitches we need. We also want you to keep in the requirement for stopping places (transit sites) and negotiated stopping so that families like ours be treated fairly.

Yours sincerely

Debby McDonagh

15 Elim Way
Plaistow
London
E13 0EH

Sadiq Khan
Mayor of London
Draft London Plan
London Plan Team
Planning & Regeneration, City Hall
Kamal Chunchie Way
London, E16 1ZE

12th October 2026

Dear Mayor Khan

I am a Traveller woman living in a Council house in Newham. I have been an activist for decades and I fight for my family and my community. I wrote to Boris Johnson when he was Mayor in 2009 about the London Plan. I am writing to you again now to speak about Gypsy and Traveller accommodation in policy HN4.

We are fifteen years down the road from my last letter and nothing has changed for the Travellers. The only thing that is different is we're older, sicker and have a lot more family. I've got three daughters and nine grandchildren that still need pitches. Newham Council sent my daughter out of the borough completely. She won't be counted in the needs assessment, but they are still responsible for her. We're still in the same boat all this time on. Our mental health is scattered, our kids have had kids. Apart from that, time has stood still for us. We're still struggling and divided.

Your Plan says Newham has to build 34 pitches. That isn't enough, but it is good that you have said this is the minimum. And it is good that you say the Council has to deliver these numbers. This should stay in your Plan. Councils won't build pitches unless they have to and our situation will stay the same.

Yours sincerely

Anne-Marie O'Brien

Dear Mr Khan,

My name is Eileen Maughan, and I am an Irish Traveller living in Haringey. I welcome the recognition in the Draft London Plan of the need for more pitches in my borough.

I have been campaigning, alongside my family and community, for culturally appropriate accommodation for over a decade. I also spoke about these issues during the previous London Plan process. Sadly, despite nearly a decade passing, many of the same problems remain.

There has been some progress, and several pitches have been proposed by Haringey Council. However, these pitches have yet to be constructed, which has been a great disappointment to me and my community. Even if all of the proposed pitches are delivered, they will still fall far short of meeting the level of need that has been identified.

This is why it is vital that minimum pitch targets for Gypsies and Travellers are retained in the London Plan. Without clear targets, our housing needs can too easily be overlooked or underestimated. Minimum targets are one of the few mechanisms that hold councils accountable for meeting identified needs rather than relying solely on their own assessments.

I spoke up about these issues during the previous London Plan in 2019, and the fact that I am having to raise them again shows how much remains to be done. Recognition of need must now be matched by real delivery.

I therefore ask you and your office to retain minimum pitch targets in the London Plan and to help ensure that the identified need for Gypsy and Traveller accommodation is met with real action.

Yours sincerely,

Eileen Maughan

9 October 2026

17 Castle Close

Hackney

London

E9 5TN

Sadiq Khan

Mayor of London

Draft London Plan

London Plan Team

Planning & Regeneration, City Hall

Kamal Chunchie Way

London, E16 1ZE

12th October 2026

Dear Mayor Khan

I am writing to you about the draft London Plan, to let you know my thoughts on the Gypsy and Traveller accommodation section.

It has been sixteen years since I responded to the London plan back in 2009. I have included that letter with this one. I'm still stuck in bricks and mortar with my four children, three of whom are adults still living under my roof, three of whom have serious mental health issues down to being overcrowded, having no privacy and being constantly let down by my local council. My oldest son and his wife are living under my roof with no help to house them from the housing officer. All this time on, we are still waiting for sites.

It's been over 30 years since the government has delivered new council pitches for us in London. This is due to the local councils not delivering and not acknowledgment the large population of Gypsy and Traveller families in their boroughs. I want to challenge local councils to meet the minimum targets for pitches in your Plan, so it is important you keep the targets in your Plan. Every Traveller family deserves a safe and culturally suitable home to live in. We are Londoners too.

Yours sincerely

Jennifer Maughan

Pitch 8

Old Willow Close

Tower Hamlets

E3 4RE

Sadiq Khan

Mayor of London

Draft London Plan

London Plan Team

Planning & Regeneration, City Hall

Kamal Chunchie Way

London, E16 1ZE

12th October 2026

Dear Mayor Khan

I am a Traveller woman living in on a site in Tower Hamlets and I am writing to you about the London Plan policy HN4.

Back in 2010, we marched, sent postcards and had meetings with the Mayor. I wrote to Boris Johnson in 2010 but as you can see, still nothing has changed. All we hear from the councils is that they can't find land for sites. But we're happy with small sites that make it easy for the Council to build and take care of. There are always more excuses, and we know that some councils will say they can't meet your targets event though those numbers aren't enough. They won't build sites unless they have to, and this is why we want you to keep the minimum targets in your plan.

There are not enough politicians involved in our struggles. If there were more keeping an eye on Gypsy and Traveller housing we might get somewhere. We need better connections with Gypsies and Travellers and their local councils to help us get sites built.

Yours sincerely

Mrs Marian Mahoney

Trustee at London Gypsies and Travellers

Living roadside/ no fixed abode

Sadiq Khan

Mayor of London

Draft London Plan

London Plan Team

Planning & Regeneration, City Hall

Kamal Chunchie Way

London, E16 1ZE

12th October 2026

Dear Mayor Khan

I am writing to you as part of your consultation on the draft London Plan. I want to tell you about my experience and what I think should be in the Plan regarding Gypsy and Traveller accommodation.

I live in a caravan with my family. For 15 years we have been campaigning to have a site built, and particularly in Newham over the last 2-3 years where we have family connections. We have asked Newham Council for some kind of temporary site while permanent sites are built. But the Council aren't opening any doors for us in this campaign. We are moved on from borough to borough, living with no fixed abode.

Wherever we go we face discrimination and we are told that we have no right to pull on anywhere.

My family's mental and physical health is severely impacted by all this. We get kidney infections because of the lack of toilet facilities. We don't have access to proper employment or education for the children.

It is important the London Plan says that Councils should build transit sites or adopt negotiated stopping. Families living by the side of the road have a right to be provided for and treated with respect. The Plan should also say that Councils have to build a minimum number of pitches to meet our needs.

Yours sincerely

Mary McCarthy

METHOD FOR USING ACCURATE POPULATION FIGURES AND CULTURAL HOUSING NEED RATES IN THE LONDON-WIDE GYPSY & TRAVELLER ACCOMMODATION NEEDS ASSESSMENT

London Gypsies and Travellers' comment on the London GTANA 2025
as published on 25 November 2025, see https://data.london.gov.uk/dataset/london-gtana-2025-2z16p, last accessed 1 October 2026.)

Briefing by Nancy Hawker, Policy and Research Officer, London Gypsies and Travellers, 14 October 2026

policy@londongandt.org.uk

Premises:

1) The Census figures are inaccurate. Specifically, they are undercounts.[1]
2) More accurate estimates from reliable sources are available.[2]
3) Culturally suitable accommodation is a component of the right to adequate housing.[3]

First step: Recalculating the rate of cultural need arising from households stuck in bricks and mortar accommodation due to lack of pitches

The London GTANA 2025 uses an incorrectly low rate of need for culturally suitable accommodation arising from households stuck in bricks and mortar.

The London GTANA 2025 ran a survey of Gypsies and Travellers in bricks-and-mortar "conventional" housing, reaching 500 households. (We do not know whether this sample was randomised to be statistically valid.) The survey was formulated before the method for calculating cultural need was devised, therefore there was no question in the survey asking, "If you were given the option of moving onto an adequate pitch in a Gypsy or Traveller site in the next five years, would you do so?" Consequently, the London GTANA 2025 attempts to arrive at a measure of cultural need by drawing on survey results in response to less exact questions. The method required that respondents to the survey answer in specific ways to three questions:

1) In response to the first question, the method required that the respondents state that they live in bricks and mortar rather than a caravan specifically due to lack of sites or because there is no choice: 82% of respondents said this was the case.
2) In response to the second question, the respondents must have positively stated that they needed to move in the next five years; and

3) with regards to the third question, which was posed to a subset of respondents comprising those who had answered yes to the second question, they must have stated their preference for moving onto a site.

The result was the finding that 19% of Gypsies and Travellers housed in bricks and mortar needed their cultural preference for living on a dedicated site to be met within five years.

The method filtered out most of the respondents to the second question: crucially, the 50% who could not definitively assert that they would need, or not need, to move in the next five years. People may consider the possible future need to move for a range of reasons, including caring responsibilities that arise suddenly, relationship breakdowns, health problems, job losses or offers, and more, which are unknowable factors of life, especially for the most deprived in society. 50% of survey respondents either answered nothing or stated that they did not know whether they would need to move within five years, and 32% said that they would indeed need to move in the next 5 years. Only 18% said that they could remain where they were living for the next 5 years, even if they were living in bricks and mortar because there were no pitches available (paras 4.52-4.54). The method can be represented by this Venn diagram, created for ease of explanation by London Gypsies and Travellers:

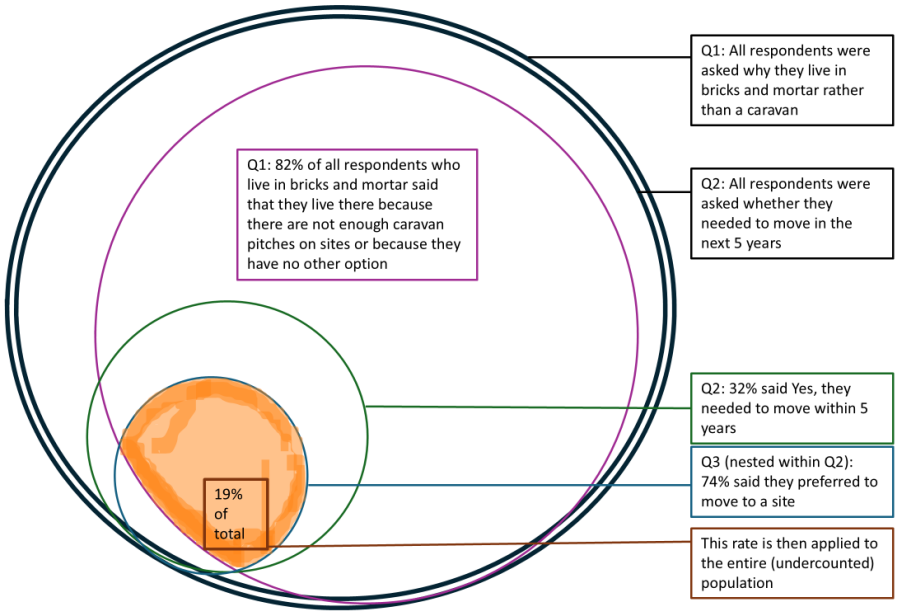


Figure 1: Illustration of the method applied in the London GTANA 2025 to calculate the proportion of Gypsies and Travellers living in bricks and mortar who expressed a cultural need for living on a site that should be met within 5 years

London Gypsies and Travellers contends that this method was unfair, because the respondents did not know that they were being asked about their need for culturally suitable homes, and it is also inaccurate, because it sets an unreasonably high bar.

The human rights method is an improved and more accurate measure of need, proposed by London Gypsies and Travellers, and used in other Gypsy and Traveller accommodation assessments, for instance by the University of Salford's Sustainable Housing & Urban Studies Unit in 2014.[4]

The human rights definition of cultural housing need makes the calculation simpler. Taking as a starting point the "London Plan definition"[5] of Gypsies and Travellers, the definition considers that bricks-and-mortar dwellings are unsuitable to a household of Gypsies, Travellers and others with a culture of nomadism, who have a cultural preference not to live in bricks-and-mortar "conventional" housing. If a Gypsy or a Traveller *prefers* a caravan pitch, and they cannot live suitably for the next 5 years because there are no pitches in the area of their Local Planning Authority, then that person *needs* a caravan pitch.

Using the same survey results as those used in the London GTANA 2025, but with the human rights method for calculating cultural need, entails addressing the needs of those whose 5-year accommodation outlook is precarious, among those who are forced to live in bricks-and-mortar dwellings due to lack of pitches. Using the "need to move" question to discount the 18% of respondents who were able to state conclusively that they did not "need to move in the next five years", the method can attend to the needs of the remaining 82% in precarious, changing and uncertain housing situations. The rate of 74% (the indicated rate of preference for living on a pitch in response to the third question) would be applied to them: 0.74x0.82=0.60. The result would be that 60% of Gypsies and Travellers living in bricks and mortar need their cultural preference for living on a site to be fulfilled within five years.

The rate of 60% immediate need is also corroborated by the hundreds of testimonies that London Gypsies and Travellers researchers have recorded over the decades, expressing increasing despair at being unable to raise the next generation of their families in accordance with their culture, as the Travelling culture has evolved in adaptation to life in London. London Gypsies and Travellers encloses eight recent testimonies with this representation to the draft London Plan consultation 2026.

The human rights method, applied to the London GTANA 2025 survey results, can be represented by this Venn diagram:

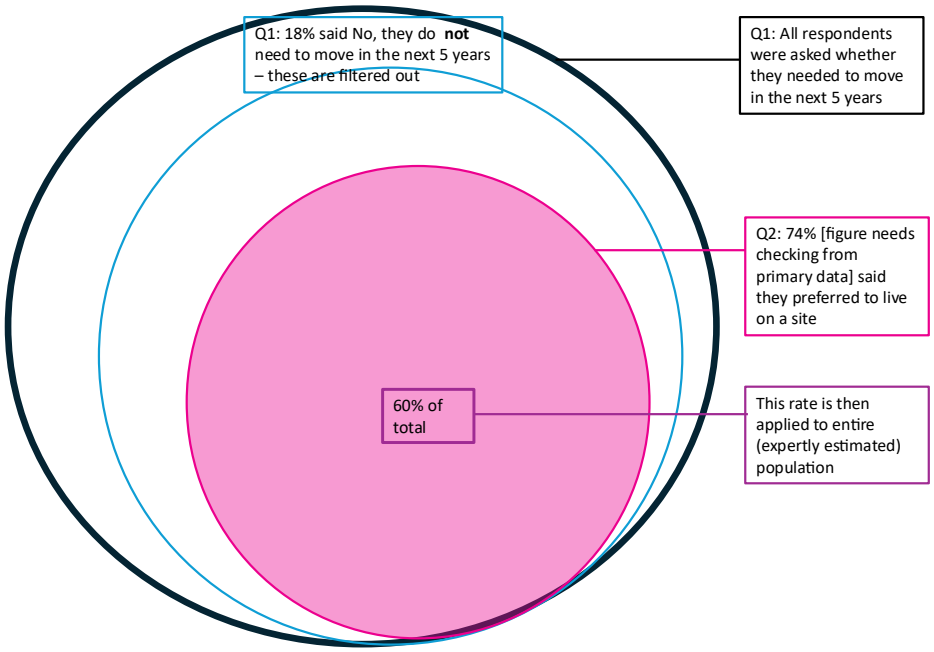


Figure 2: London Gypsies and Travellers' suggested human rights-based method for calculating the proportion of Gypsies and Travellers whose need for culturally suitable accommodation needs to be met within five years

Subsequent steps of an improved method for pitch calculation: Using the same logic as the London GTANA 2025, but with a more accurate population figure and pitch preference rate, leads to the following calculation:

1) In 2011 there were an expertly estimated 14,881 Gypsies and Travellers in London.[6]
2) Adding population growth of 14 years at an annual rate of 3% gives the result of 22,508 in 2025.
3) The average Gypsy and Traveller household has 4 members.[7] Therefore there were 5,627 Gypsy and Traveller households in London in 2025.
4) According to the London GTANA 2025, there are 823 pitches in London (Tables 5.1 and 5.2), each assumed to accommodate one household. (We can assume, based on the fieldwork, that nearly 100% of households already living on pitches want to remain on pitches.)
5) Therefore, there are 4,804 Gypsy and Traveller households in bricks-and-mortar standard housing in London (5627-823=4804).
6) We apply the rate of 60% for cultural preference for living on a pitch to households in bricks and mortar, giving 2,882 pitches needed for Gypsies and Travellers moving out of bricks and mortar.
7) We add the need arising from bricks and mortar to the need arising from sites (321 pitches, see Table 5.32 (without double counting the need arising from bricks and mortar), giving 3,203 (2882+321=3203).

The conclusion is that there is a need for 3,203 additional pitches in the first five-year period of the London GTANA, to be used in the evidence base for the next London Plan.

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[1] The following sources acknowledge that the 2011 and 2021 Censuses undercounted Gypsies and Travellers, as well as other under-represented minorities:

- Office for National Statistics, *2011 Census analysis: What does the 2011Census tell us about the characteristics of Gypsy or Irish travellers in England and Wales?*, 21 January 2014.
- Women and Equalities Committee*, Tackling Inequalities facing Gypsy, Roma and Traveller Communities*, 5 April 2019.
- Office for National Statistics, *Gypsies' and Travellers' lived experiences*, overview, England and Wales: 2022, 7 December 2022.
- House of Commons Library, *Gypsies, Roma and Travellers: Statistics: Research briefing*, 2 August 2024.
- L. Daniel Staetsky, The strictly Orthodox Jewish population in the United Kingdom: Assessment of the census undercount using an alternative estimation system. *Population Studies*, February 2025
- The London GTANA 2025 itself, *Use of Census Data*, paras 3.14-3.19

[2] The following sources examine the causes and solutions to the Census undercounts:

- Peter John Aspinall, The utility and validity for public health of ethnicity categorization in the 1991, 2001 and 2011 British Censuses. *Public Health*, Oct 2011.
- Pat Niner & Philip Brown, The evidence base for Gypsy and Traveller site planning: a story of complexity and tension. *Evidence & Policy*, August 2011.
- The Irish Traveller Movement in Britain, *Gypsy and Traveller population in England and the 2011 Census*, August 2013, cited by the ONS and Parliamentary sources listed above.
- University of Salford – Manchester, *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Telford & Wrekin Council*, November 2014.
- Ludi Simpson et al., The Stability of Ethnic Identity in England and Wales 2001–2011. *Journal of the Royal Statistical Society*, October 2016.
- The Council of Europe, Advisory Committee on the Framework Convention for the Protection of National Minorities, *Fifth Advisory Opinion on the UK*, 8 December 2022.
- Hackney Council, *Freedom of Information Response*, 8 August 2025, stating:
  Population data is sourced from various channels, including the ONS census, information from Traveller sites and their waiting lists, and data provided by the Education Service. We also incorporate data from the London Gypsies and Traveller organisation. This comprehensive methodology allows us to achieve a relatively accurate understanding of the Irish Traveller population. [...] Hackney Council generally agrees that the ONS census is unreliable and constitutes an undercount. Reasons for this may include:
  - distrust of how the census might be used as a result of generational trauma and/or present day racism;

- issues with the Census 2021 categories of "Roma" and "Gypsy or Irish Traveller" being under the "White" ethnic group when there are members of this community who are not White or do not identify as such;
- challenges around carrying out the 2021 Census during a nationwide lockdown impacting participation more broadly.

We recommend direct engagement with relevant communities and independent organisations when designing and implementing policies to ensure such policies reflect community need, this is particularly important with communities where it is suspected that the data in the Census 2021 represent an undercount. We recognise that the 2021 census figures represent an undercount, take this into account, and seek to engage directly when designing and implementing policy when we are aware of an undercount. Our understanding of the population is derived from a number of sources including the 2021 Census, where there were 1,113 residents in Hackney who identified as White: Gypsy or Irish Traveller or White: Roma. We estimate the total number of Romany Gypsies, European Roma, and Irish Travellers living in Hackney to be above 1,113.

[3] Human rights and planning regulations:
The UK's national regulations are now in general conformity with General Comment 4 (Right to Housing) and General Comment 21 (Right to Nomadic Culture) on the International Covenant on Economic, Social and Cultural Rights, which the UK ratified in 1976, see 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://www.escr-net.org/resources/general-comment-4 , para 8(g), accessed 1 July 2024; and also General Comment 21: Right of everyone to take part in cultural life (Article 15, para 1(a), of the International Covenant on Economic, Social and Cultural Rights), 21 December 2009, https://www.ohchr.org/en/resources/educators/human-rights-education-training/i-general-comment-no-21-right-everyone-take-part-cultural-life-article-15-para-1-international, para 16(e), accessed 14 October 2026. These rights are generally incorporated in UK law via the Human Rights Act 1998 (particularly Article 8) and the Equality Act 2010.

Definitions of Gypsies and Travellers for planning regulations respect cultural needs since December 2024:
See NPPF 2026, p.106: "Gypsies and travellers: Persons of nomadic habit of life whatever their race or origin, including such 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 all other persons with a cultural tradition of nomadism or of living in a caravan," (available at https://assets.publishing.service.gov.uk/media/6aabe97844ec1aa417346c0b/National_Planning_Policy_Framework.pdf , accessed 14 October 2026)

The previous, discriminatory, definition caused a suppressed count of need for culturally suitable accommodation by approximately 75%, and these underestimates are still in use by some local planning authorities in London without correction:
See Equality and Human Rights Commission Research, report 128, 2019, Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs, available at https://www.equalityhumanrights.com/sites/default/files/190909_gypsy_and_traveller_sites_-_impact_of_the_revised_definition_-_final.pdf , accessed 14 October 2026).

The following human rights bodies have made specific calls on the UK authorities:

- The UN Committee on Economic, Social and Cultural Rights stated in its concluding observations on the seventh periodic review of the UK on the 28th of February 2025:

"The Committee urges the State Party to [...] Ensure adequate, culturally appropriate accommodation and stopping sites for Gypsy, Roma and Traveller communities, including access to water, sanitation and electricity, in coordination with local authorities", available at: https://digitallibrary.un.org/record/4078754?v=pdf last accessed 19 August 2026.

- The Council of Europe also noted the risk of forced assimilation of Gypsies and Travellers in the UK if nomadic ways of life are suppressed, in violation of Article 5 of the Framework Convention for the Protection of National Minorities which the UK ratified in 1998. The Fifth Opinion on the UK, published by the Advisory Committee on the Framework Convention for the Protection of National Minorities on 25 May 2023, stated in para 107: "The Advisory Committee urges the authorities to take priority measures to address the accommodation needs of persons belonging to Gypsy, Roma and Traveller minorities [...]" available at: https://rm.coe.int/5th-op-uk-en/1680ab55b4 last accessed 19 August 2026.

[4] University of Salford – Manchester, *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Brighton & Hove City Council and the South Downs National Park Authority*, November 2014, available at: https://www.southdowns.gov.uk/app/uploads/2015/08/Brighton-Hove-and-SDNP-FINAL-report.pdf accessed 1 October 2026.

[5] The previous London Plan, in its draft form in 2018, sought to rectify the then discriminatory national definition by reiterating an inclusive definition:
"As of the start of this Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need: People with a cultural tradition of nomadism, a nomadic habit of life, or living in a caravan, whatever their race or origin, including: 1) those who are currently travelling or living in a caravan 2) those households who currently live in bricks and mortar dwellings whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation [...]."
The London Plan definition itself was based on the DCLG's *Draft guidance to local housing authorities on the periodical review of housing needs - Caravans and Houseboats* from March 2016, which stated "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)," available at https://assets.publishing.service.gov.uk/media/5a808a48e5274a2e8ab50bb0/clause_115_draft_guidance.pdf, accessed on 20 June 2025. However, the London GTANA 2025 did not base its count on the London Plan definition, and rather used the national framework (endnote no.3 above), which does not explicitly specify cultural unsuitability of bricks and mortar as a basis for assessing need.

[6] The Irish Traveller Movement in Britain, *Gypsy and Traveller population in England and the 2011 Census*, previously cited. This is likely to be an undercount but it is reliable enough.
[7] 32.6% of Gypsies and Travellers in London live in overcrowded conditions according to the Office for National Statistics, *Gypsy or Irish Traveller populations, England and Wales: Census 2021*, 13 October 2023. The average size of a household in England is 2.2 people, according to the Department for Levelling Up, Housing and Communities, *Accredited official statistics Chapter 1: Profile of households and dwellings*, 14 December 2023. According to the London GTANA 2025, 63% of pitches (assumed to house one household) accommodated more than 6 people (Table 5.10). Four persons per household appears as a reasonable working number in this context, though the aim ought to be to reduce overcrowding and react to birthrate changes in the longer term.