



Objection to

The London Plan

consultation draft replacement - October 2009
the 2nd alteration - September 2010

Policy 3.8i and paragraphs 1.25 and 1.28, and table 8.1

Gypsies and Travellers

We are Londoners too

London Gypsy and Traveller Unit

October 2010

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**This objection does *not* replace
the previous one by LGTU of May 2010,
but adds to it.**

This report should be read alongside the previous one, which is available at <http://www.lgtu.org.uk/LGTU%20100527%20%20Objection%20to%203.9%20and%20Alteration.pdf>

1. This report does not consider the needs of travelling show-people or Roma. LGTU supports the objections made by the Show-people's Guild and others who argue for policies that address the needs for pitches and yard as evidenced by the community, the GTAA and support organisations.
2. The words 'Mayor' and 'GLA' are used interchangeably.

This report was compiled by Bernard Bourdillon MRTPI with the help of LGTU staff and Gypsies and Travellers. Katy George, Debbie Kennet, Gill Brown, Tracy Giles and Helena Kiely of LGTU contributed Section 4 on Need.

The London Gypsy and Traveller Unit has been actively supporting Gypsies' and Travellers' involvement in the development of the London Plan through

- Building capacity for direct involvement through consultation meetings on both the replacement London plan and the 'Minor' Alteration. This is evidenced by the numbers of submissions from Gypsies and Travellers.
- Administering and maintaining the London Gypsy and Traveller Forum, a GLA supported stakeholder organisation attended by Gypsies and Travellers.

The Unit is both a community development organisation and a regional strategic organisation. It seeks to support Travellers and Gypsies living in London, to have greater control over their lives; to influence decisions affecting their lives; to improve their quality of life and opportunities available to them; and to challenge the discrimination they routinely experience. It uses this detailed local and regional experience to contribute to national consultation and debate, and has done so over the past 29 years.

LGTU has wide experience of accommodation issues. It was actively engaged in fighting roadside evictions, negotiating tolerated sites and campaigning for official sites in North and East London throughout the 'eighties and early 'nineties during which time eight new sites were built.

When the Criminal Justice Act of 1994 repealed the duty to provide sites and increased eviction powers, roadside families were forced into housing and many boroughs began to close sites. LGTU fought these closures. It also started an advice service for housed travellers to respond to the loss of extended family support for these often very young families; the difficulties of coping with bricks and mortar living; and the hardships of temporary accommodation.

Since 2004, LGTU has been actively supporting residents in the development of the four 'Olympic replacement' sites, and has worked for the provision of new sites under the Housing Act.

Throughout, the Unit has continued to work with young Gypsies and Travellers on sites and in housing.

This submission has been informed by our long term involvement with the Gypsy and Traveller community both on sites and with those in houses as well as the specific feedback at consultation meetings on the London Plan.

Index

0	Introduction	
1	1 LGTU's previous submission.....	1
2	2 Policy 3.8i and LGTU proposals.....	2
3	3 The consultation process	4
1	Equalities and prejudice	
1	1 Recognising exclusion	7
2	2 Equalities duties.....	8
3	3 The Mayor's equalities policies	9
4	4 Pitch provision and prejudice	10
5	5 Pitches for fairness and inclusion.....	11
2	Providing pitches	
1	1 A poor record	12
2	2 Protect sites	13
3	Policy and evidence	
1	1 Planning policy for housing	14
2	2 A robust GTAA	16
3	3 A GLA role	18
4	A real need	
1	1 Evidence from the community	19
2	2 LGTU experience	22
3	3 Other studies.....	23
5	Performance benchmarks.....	25
Appendices:		
A	Assessment of GTAA fitness-for-purpose	27
B	Poor data	28
References	30

0 Introduction

0.1 LGTU's previous submission of May 2010

This objection does *not* replace the LGTU's previous one of May 2010, but adds to it.

This report should be read alongside the previous one, which is available at:

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We believe that everything the previous report said is still important. However, in keeping repetition and paper down, we do not refer to some sections which the May covered fully.

In particular, we do not refer to or repeat what was said about

Land: (section 4). We hold that there is no objective evidence that a land shortage in London is a barrier to building 80 pitches – on 1½ ha – a year. This issue is strongly connected to section 1.3 of this report - Pitch provision and prejudice.

Waiting Lists (section 6.2). These are an essential ingredient both in the proper management of sites that is necessary in addressing the needs of Gypsies and Travellers and in needs assessment and monitoring.

0.2 Policy 3.8i and LGTU proposals

The policy

The supporting paragraphs 3.47 and 3.48 proposed in the 2nd minor alteration are empty of any planning content, but are clearly disadvantageous to Gypsies and Travellers. This contrasts sharply with paras 3.38-3.46 on the other aspects of 3.8.

Over half the content of the supporting paragraphs comprises 4 similar ways of passing responsibility for Gypsy and Traveller policy to the Boroughs.

The last third is a quotation from “*some ‘questions and answer’ advice on immediate issues*” [CLG 1020a]. This is a temporary bit of fire fighting, so to build it into policy 3.8i betrays a complete lack of concern with future-proofing this element of the Plan.

The first portion, apparently proclaiming fair play, is in a very particular code which will be linked, in the minds of those on both sides of the policy debate, with statements such as Andrew Stunell’s that: “We will be giving councils more powers to tackle unauthorised development to ensure fair play in the planning system” [Hansard 26th July 2010]. This sort of fairness is totally unfair to Gypsies and Travellers. Only when it is linked to a policy that really provides more authorised pitches does it start to become fair.¹

Like many policies in the Plan, 3.8i only takes on a useful meaning by reference to the supporting paragraphs and, through them, to the rest of the Plan. The present paragraphs provide no link to the rest of the Plan or to the evidence and so leave the policy itself devoid of any real meaning.

LGTU Proposals

LGTU proposes that the following amendments are made to the Plan. These proposals are derived from the argument of this report and the previous submission of May 2010.

1. Policy 3.8i should state (in the policy itself) that “Borough DPDs should protect existing authorised pitches.”

The supporting paragraphs can explain that in unavoidable cases of closure, this should not happen till a one-for-one replacement has been provided. The replacement of the sites from the Olympic park can be used to illustrate this.

2. The supporting paragraphs to policy 3.8i should clearly
 - report the extent of the loss of authorised pitches over the last 14 years
 - promote understanding by acknowledging the evidence of disadvantage, inequality (or unfairness) and exclusion suffered by London’s Gypsy and Traveller Community
 - show, in their general approach, an understanding that the provision of pitches for London’s Gypsies and Travellers clearly arises from Equalities legislation, PPS3 and related guidance; and that it promotes inclusion and fairness.
3. The supporting paragraphs should acknowledge that a positive, constructive policy at London and Borough level is necessary for the realisation of the *Equal Opportunities for All* strategy, the *Housing Strategy*, the Mayors vision for the Plan as well as its policy 3.1 and paras 3.2 and 3.12a.

¹ See, section 1.5 below

4. The Mayor should, in the supporting paragraphs, tackle prejudice by
 - proclaiming that Gypsies and Travellers are Londoners with an equal place in any planning policy for housing
 - distancing himself from the attitudinal² barriers to pitch provision.
5. The supporting paragraphs should accept the findings of the GTAA and encourage Boroughs to use it as a basis for HMAs, policy development, and updating.
6. The SHMA should be updated to include the findings of the 2008 London GTAA (including the inclusive 'maximum' figure), the West London Study and other reports on London's community in order to begin to conform to PPS3 and the Practice Guidance.
7. The GLA should, in the supporting paragraphs, accept a continuing, leading role in
 - conducting a coherent London-wide needs assessment update, to feed into its own SHMA and to inform the sub-regional HMAs.
 - monitoring pitch numbers in line with its joint responsibility for Core Output Indicator H4 and to work towards improved data, including waiting lists.
8. The Mayor should assist Boroughs in tackling prejudice locally by
 - laying out expectations on the Boroughs in terms of DPD production and implementation that support them in combating attitudinal barriers to pitch provision, and
 - setting performance benchmarks for the Boroughs provision of sites.
9. Other parts of the Plan should be amended as follows:
 - Para 1.24 should specifically include Gypsies and Travellers.
 - Para 1.28 should contain a statement on Gypsies and Travellers as suggested in 1.3 of the previous report.
 - The KPIs in table 8.1 should include Core Output Indicator H4
10. The Integrated Impact Assessment should be corrected, unless the policy is changed, to take account of the removal of the responsibility, previously placed on Boroughs, to protect existing sites.

² We offer the Mayor the softer language of "attitudes", as accepted by the GLA in its promotion of the 'Social Model of Disability', but the hard truth is one of prejudice.

0.3 The consultation process

The GLA's treatment of the consultation process and, in particular, the views of the Gypsy and Traveller community has been discriminatory and a denial of the Mayor's own pronouncements. The story is told here because it is an apposite example of the exclusion experienced by Gypsies and Travellers and of the way that public policy works to their disadvantage, unless the real implementation of equalities duties and policies are taken seriously. Moving the policy to a more local level will exacerbate this situation.

The Mayor says³ that he wants to make sure that:

“Inclusive engagement with London's excluded communities informs the development and delivery of all GLA strategies plans and programmes”.

(Verdict: **FAIL** despite the best endeavours of the Gypsy and Traveller Community)

At the start of his opening speech to the Examination in Public, the Mayor proclaimed⁴ that he

“was encouraged to receive comments from 150 organisations and individuals (*to an outline document*). The level of interest has not diminished – we received over two hundred responses to my initial proposals for this new Plan, and nearly a thousand to the draft Plan itself.”

What follows tells the story of how the policy that has developed has gone in directly the opposite direction from the enormous majority of those responding.

The process

While the pan-London target for new pitches is not the only concern of Gypsies and Travellers, it provides a useful focus for describing the consultation process:

London's Gypsy and Traveller Accommodation Needs Assessment (GTAA) [March 2008] gave evidence for an inclusive⁵ target of circa 800⁶ new pitches for 2007-2017. In March 2009 the GLA began three rounds of informal consultations on the distribution of this target between the Boroughs. The inclusive figure was the basis for the first round, while lower alternatives of 538 and 238 were put to the second round. In the public accounts of these negotiations (submitted to EiP library) there is no evidence of a significant balance of opinion opposing the higher or 'midpoint' pan-London target.

The draft Replacement London Plan [Oct 2009] included the 'midpoint' target of 538, as did the final Housing Strategy [GLA Feb 2010]. The numbers and leaning of the responses to the consultation on this draft (closing in January 2010) are given in the table below.

The Gypsy and Traveller community and community/support organisations contributed 33% of all the representations on the whole plan, supporting the inclusive figure. The 47 individual letters in support of the inclusive target were detailed and informative about the experiences and needs of the Gypsies and Travellers in London.

³ Equal Life Chances for All [GLA 2009]

⁴ However in the next sentence he recounted that rebuilding after the great fire had been decided by “an examination in private attended by a range of key city stakeholders” with the arrest of a dissenter. LGTU fears that some things never change.

⁵ Inclusive of the assessed needs for pitches of those in bricks and mortar housing.

⁶ This changes throughout the period of policy development because of data corrections.

Responses to the Public Consultation draft plan policy 3.9	Views on higher target			Total
	For	Against	middling unclear	
Non-governmental responses				
Individuals: Letters	47	26	2	65
Individuals: Cards	249			249
Community Groups + other	15	2	1	18
Total	311	28	3	342
Governmental responses				
GoL	1			1
London Councils subregions			1	1
Boroughs: re London target	2(?)	6	3	11
re Borough target only		7		7
Show-people/transit only, unclear			3	3
no comment made			12	12
Total	3(?)	15	21	39

1st alteration

In March 2010 the GLA issued a 'Minor Alteration' reducing the London target to 238.

The Alteration was accompanied by an Explanatory Note which got off to a bad start by describing the division of responses on the pre-alteration draft as being between "government and gypsy and traveller community" and "boroughs and residents". [GLA 2010A para 2] From this we deduced that the Mayor thinks that Gypsies and Travellers are not residents. Innuendos such as this throughout the note and policy itself broadcast a clear but sorry political message of Gypsies and Travellers as "the other".

The Note [para 3] went on to say that there was a significant number of submissions by boroughs "and other agencies" arguing for reduced targets. However, in truth there was an insignificant number from "other agencies": Only 2 were not from (groups of) boroughs.

Then "In addition (*to the properly made submissions, one presumes*), the Mayor has received more specific expressions of concern from Boroughs and others" causing the Mayor to change his mind through the Minor Alteration. This lobbying, it appears, was done behind the scenes of the public consultation exercise and was never made public. For example, a report from the Conservative Group on the GLA is neither registered as a formal response nor in the EiP library (now submitted by LGTU). Yet it appears, by virtue of its similarity to the Mayor's final policy, to be the most important document to him in the whole affair.

Finally Para 4 of the Note claims that the 'polarisation of views' caused the Mayor to reconsider. This is dissembling: Given the one-sided outcome only the views for a lower target such as the un-tabled political document can have been important to the Mayor.

The Gypsy and Traveller Community responded to the 1st Alteration in some 280 cards and standard letters supporting a higher target, with some 16 letters and submissions from individuals and community support groups. There were 18 individual letters in favour of the alteration, 16 Boroughs were in favour, 2 sat on the fence and 16 made no response.

2nd alteration

In July the new Government revoked Regional Spatial Strategies, including their targets for Gypsy and Traveller pitches. The CLG issued “*some ‘questions and answer’ advice on immediate issues*” [CLG 1020a] to local authorities.

Immediately following this, the Mayor announced that he would keep all the targets in the London Plan except for pitch targets, for which he would issue a 2nd alteration. This appeared in September, abandoning a target altogether. In the explanatory note he wrote that “Addressing the pitch requirements of gypsies, travellers and travelling show people [in the plan] had proved problematic for the communities themselves”. This is, again, entirely misleading. True to say: “That the Mayor would not begin to address the pitch requirements of Gypsies, Travellers and travelling show-people has proved a savage blow for the communities themselves.”

1 Equalities and prejudice

The main reason that there has been, and is, a pan-London policy for Gypsies and Travellers is because they are demonstrably excluded and disadvantaged, suffering from a long term under-provision of pitches. The omission of any acknowledgement of this from the Draft London Plan is so complete as to amount to denial. The GLA thereby fails in its legal obligations, and betrays its policies on equality and diversity as no more than words.

This section lays some foundations for the report by giving a brief overview of

- the plight of the Gypsy and Traveller Community,
- some of the legal requirements on the GLA in respect of equalities and the London Plan,
- related policies of the Mayor, and
- the link between prejudice and poor pitch provision.

1.1 Recognising exclusion

“Being forced to live in a way we don’t want to, and to suffer the racism that we have suffered is having a very bad effect on our community because people are mixed up, confused and scattered, but we are trying our best to hold on to our culture.”

There is a substantial body of research literature [for example, see Cemlyn et al 2009 and CRE 2006] that gives evidence of the prejudice and poverty that continues to confront Gypsy and Traveller communities:

- **"Discrimination** against Gypsies and Travellers appears to be the last 'respectable' form of racism." [Phillips T 2004]
- As to **accommodation**: there are too few authorised sites, road side camps are constantly moved on, access to social housing is difficult, private renting housing is temporary and poor quality.
- Participation in secondary **education** is extremely low: discrimination and abusive behaviour are frequently cited as reasons for children leaving education early.
- They have significantly poorer **health** than other minorities. Reported health problems are between two and five times more prevalent than the general population.
- **Policy** initiatives and political systems that are designed to promote inclusion and equality frequently exclude Gypsies and Travellers. This includes political structures and community development.

Most recently, the study by the Centre for Analysis of Social Exclusion [LSE 2010] highlights that the Gypsy and Traveller Communities continue to suffer across health, accommodation, education and employment.

1.2 Equalities duties⁷

It follows from S149 (et al⁸) of the *Equalities Act 2010* that, in the London Plan, the GLA must have due regard to the need to

- a) eliminate discrimination, harassment, victimisation
- b) advance equality of opportunity⁹ between Gypsies and Travellers and others, in particular the need to
 - i) remove or minimise disadvantages suffered by the Gypsy and Traveller community
 - ii) take steps to meet the needs of Gypsies and Travellers that are different from those of others
- c) foster good relations between Gypsies and Travellers and others, in particular the need to
 - i) tackle prejudice, and
 - ii) promote understanding.

S159 specifically allows proportionate positive action in response to these duties.

The London Plan particularly fails in respect of b) and c) above.

The Integrated Impact Assessment

The Integrated Impact Assessment has moved from being strongly positive on 'Health & Wellbeing' and 'Equalities' objectives and positive on the 'Housing' objective for the original policy 3.9 to being neutral or uncertain on all objectives [Entec, 2010]. This is in spite of the most recent IIA's failure to report or assess the withdrawal of the policy that DPDs should protect existing sites. It also used inaccurate data on pitch numbers¹⁰.

⁷ The European Convention on Human Rights which also has a strong bearing on this issue is dealt with in the submission by the Traveller Law Reform Project.

⁸ To S149 should be added reference to Schedule 19 of the Act and the case law (?) which decided that Gypsies and Travellers are people who share "relevant protected characteristics" by virtue of their race

⁹ This is reinforced by the requirement, in s33 of the GLA Act 1999, that the GLA has due regard to the principle that there should be equality of opportunity for all people.

¹⁰ Although it recognised the "high level of uncertainty regarding the quality and consistency of the information provided by boroughs.." Entec [2010 p19]

1.3 The Mayor's equalities policies

The opening vision of the Mayor's ***Equal Life Chances for All*** [GLA 2009] is that:

"Inclusive engagement with London's excluded communities informs the development and delivery of all GLA strategies plans and programmes".

The London ***Housing Strategy*** [Feb2008] includes the following statements

1.3.2 Providing for all

The social housing sector provides good quality, affordable homes for people on low incomes. It also meets a diversity of needs, including support needs and the diverse needs of groups with specific housing requirements, including Gypsies and Travellers, disabled people and older people.

Policy 1.3D More accommodation will be provided for Gypsies and Travellers, and existing provision will be improved.

Through his draft London Plan, the Mayor proposes a target for an additional 538 pitches over ten years to meet the needs of Gypsies and Travellers across London. The Mayor will work with all stakeholders to provide guidance on implementing this policy, including sources of pitch provision, social and other infrastructure, and measures to foster greater social inclusion.

The Mayor will also encourage boroughs to protect existing Gypsy and Traveller pitches and refurbish existing sites where needed ...

The first item in the Mayor's vision for ***The London Plan*** [2010] is that it

"helps tackle the huge issue of inequality among Londoners, including inequality in health outcomes". (P27) (We are assured that this is to be read fully into Policy 1.1)

Within the Plan, the Mayor says;

Policy 3.1 *Ensuring equal life chances for all:*

"Meeting the needs and expanding opportunities for all Londoners – and, where appropriate, the needs of particular groups and communities – is key to tackling the huge issues of inequality across London"

3.2 The Mayor is committed to securing a more inclusive London which recognises shared values as well as the distinct needs of the capital's different groups and communities, particularly the most vulnerable and disadvantaged..... The Mayor's Equality Framework promotes an approach that brings Londoners together, rather than dividing them. In order to do so, the Mayor has adopted a new definition of equality that focuses on promoting equality for those groups who enjoy legal protection against discrimination

3.12A The Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, across a range of tenures that meets their diverse and changing needs at prices they can afford. To achieve these aims, he is committed to taking effective steps to encourage the provision of new homes through the policies in this Plan (which deal with identifying housing need and capacity to help meet this) and in his London Housing Strategy (which deals, among other things, with detailed questions of investment and delivery for which he has particular responsibility).

1.4 Pitch provision and prejudice

Prejudice is the most significant barrier to meeting the pitch needs of London's Gypsies and Travellers. As a CRE study [2006 p37] notes

“Because of these difficulties (*of local prejudice*), many councillors said that the statutory duty to provide public sites should be reintroduced....”

By laying down stronger expectations of action by Boroughs and others, the London Plan can help them withstand the pressures of local attitudes, ignorance and prejudice. This can be, at least, in the form of positive statements on inclusive LDF statements and the conduct of sub-regional Housing Market Assessments¹¹.

Placing reliance on Boroughs and their local communities, as in the 2nd alteration, will be a severe blow to this most disadvantaged social group.

“Policy initiatives and political systems that are designed to promote inclusion and equality frequently exclude Gypsies and Travellers. This includes political structures and community development.” [Cemlyn et al 2009]

There is a substantial body of research that gives evidence that the prejudice confronting Gypsy and Traveller communities works its way, possibly via strong pressures on Councillors, through to fewer authorised pitches. We give just one example, from the Good Practice Guidance of the Royal Town Planning Institute:

“Development management planners are often under pressure to consider racially motivated and discriminatory views and representations relating to Gypsy and Traveller communities. The incidence and adverse effects of such representations have not necessarily received the systematic attention of those working to eliminate discrimination. There are still circumstances where politicians, practitioners and members of the public apparently consider openly biased, discriminatory and unfounded remarks about Gypsies or Travellers as individuals or communities to be somehow legitimate or acceptable, in circumstances where similar remarks made about other black or ethnic minority communities would be immediately recognised as discriminatory and unacceptable.” [RTPI 2007]

This is supported by

- CRE 2006 on Equality and Race relations: see, eg, chapter 5 on planning
- DCLG [2007c] on site provision and enforcement: see, eg, pp52-54 on political leadership.
- Cemlyn's et al [2009] on inequalities: see, eg, the executive summary
- Brown and Niner [2009] on recent history of site provision: see, eg, Ch8 on barriers to provision of pitches

This can often influence Councils' policies, categorising Gypsies and Travellers as 'the other', pitched against "overall housing requirements" or "wider ranging need" or "residents"¹²; or that "wider housing targets would be compromised"¹³; that sees building 5 over ten years instead of 3 pitches as to "prioritise gypsy and traveller sites over conventional housing"¹⁴.

¹¹ A web search finds no mention of the Gypsy and Traveller Community in various of the Borough and sub-regional housing assessments and strategies.

¹² These can be found in the GLA papers for the 1st Alteration

¹³ London Assembly Conservatives [2010]

¹⁴ Submission to the DLRP EiP, LB Islington

1.5 Pitches for inclusion and fairness

In section 4 we consider the need for pitches. However it is important to stress that new pitches mean more than the increased welfare of the allocated families. There are significant spin-offs for inclusion and fairness¹⁵. All this reinforces that the GLA should effectively promote pitches to conform to its equalities duties.

Sites for inclusion

There should be no doubt that the provision of well managed sites promotes inclusion for Gypsies and Travellers while housing fosters exclusion.

Section 3.8 of the previous report gave evidence of strong community relations between Gypsies and Travellers on London sites and the local housed population. This needs to be accepted and broadcast by the GLA.

Section 4 below describes this further and gives evidence of the exclusion and discrimination experienced by housed travellers.

Fairness in planning

The CRE [2006] report *Common Ground* (Ch4) gives a useful description of the difficulties that the planning system poses for Gypsies and Travellers. It is clear that it is still very difficult for them to get planning permission for a site: the outcome of the planning system is still unfairly tilted against them.

A number of studies link enforcement and authorised pitch provision: pitch provision significantly reduces enforcement costs; and evictions while providing no alternative pitch is clearly unfair and challengeable under Human Right law. The clearest example of this link being made is by the *Task Group on Site Provision and Enforcement for Gypsies and Travellers* [DCLG 2007c]:

Most crucially, it (*the Task Group*) identified early on that it was impossible to consider the issues around effective enforcement without also considering the barriers to the provision of authorised sites. It quickly became clear that, if people had no alternative but to camp in unauthorised locations, enforcement could do no more than move the problem from one place to another. And with repeated evictions a matter of everyday life for so many Gypsies and Travellers, health, educational and social outcomes were unlikely to improve. Ministers therefore agreed the Task Group's request to expand its terms of reference to look at both the enforcement and provision of authorised pitches.

This same report then goes on, in Chapter 2 *Site provision*, to highlight the lack of responsiveness of the planning system to the needs of Gypsies and Travellers except through the appeals system.

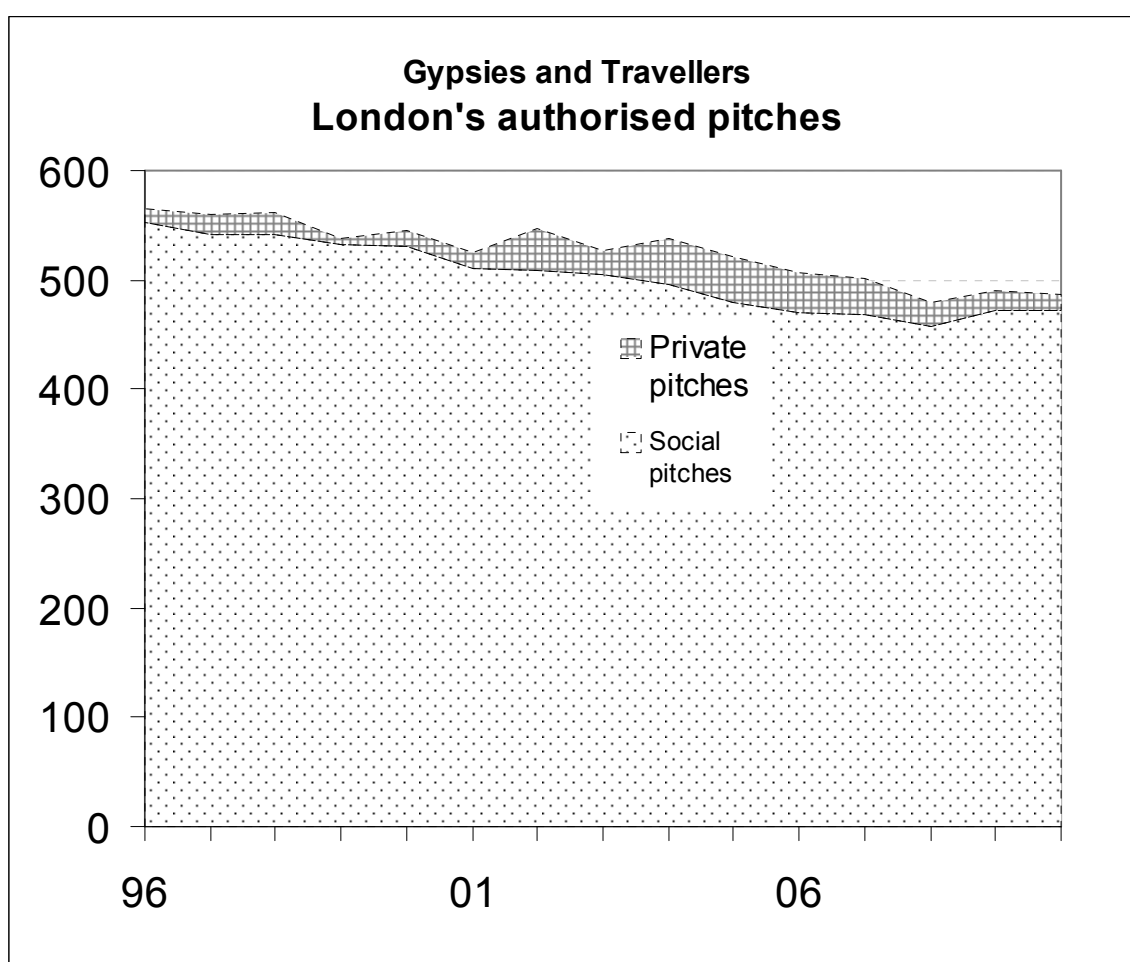
¹⁵ We use the word fairness rather than equality because our discussion relates to Mr Stunell's kind of fairness mentioned in section 0.2

2 Providing pitches

2.1 A poor record

Section 1.3 [pp9-11] and Appendix 2 [pp38-39] of the previous submission should be read together with this report. They give details of the history of site closure, the traumatic effect of eviction and the poor record of pitch provision.

Here we simply add graphical evidence that is the result of further data analysis by LGTU. This substantiates the poor history of providing authorised pitches in London showing, for example, a reduction of 14% over the last 14 years. It also supports the view that Boroughs left to their own devices will not provide sufficient accommodation.



The GLA acknowledges “London’s poor track record in increasing pitch and pot provision”¹⁶. This is the about the most acceptable statement in the 1st alteration yet even this is begrudging and misleading, carrying with it the clear message that there has been *some* increase.

¹⁶ Explanatory note to the 1st alteration para 28.

2.2 Protect sites

The London Plan should say that local DPDs should protect existing sites.

- The London Housing Strategy [GLA 2010] states that the Mayor “will also encourage boroughs to protect existing Gypsy and Traveller pitches”
- The first draft of the Replacement London Plan [GLA 2009] states that
Boroughs should translate ... targets ..intosite allocations on the basis of

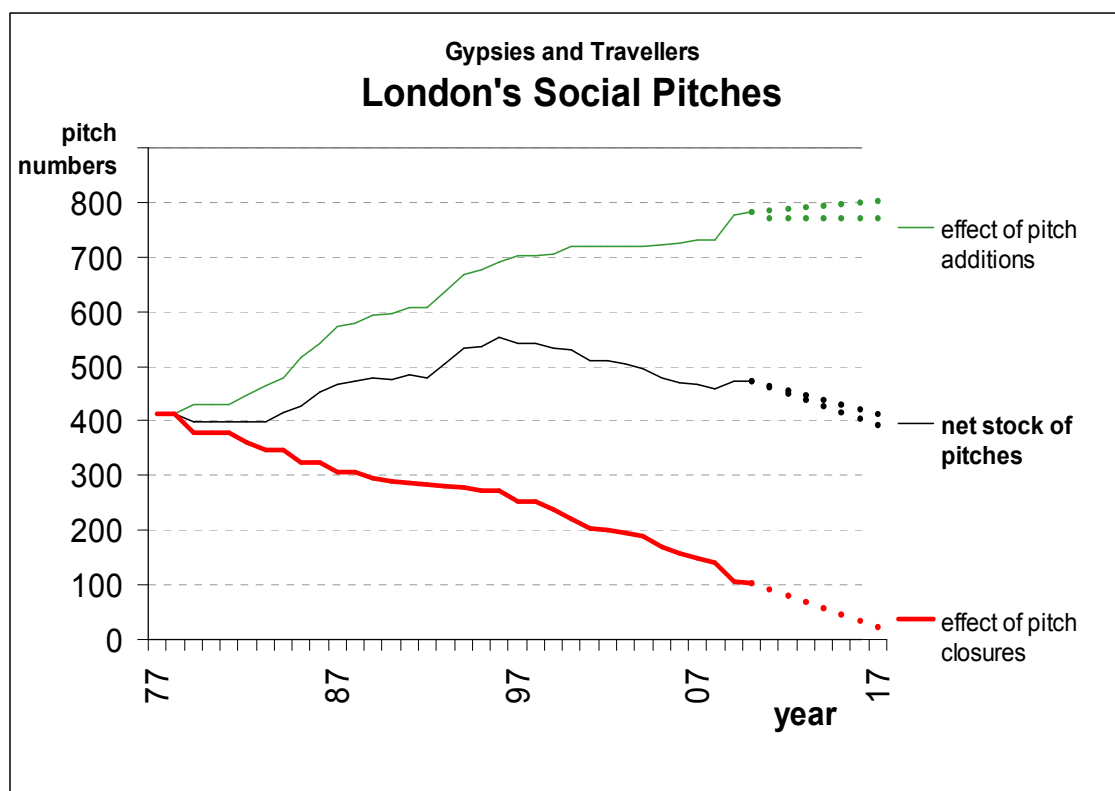
 c net existing and new capacity being protected.¹⁷
- The policy of the previous adopted Plan [GLA 2008] said “DPD policies should protect existing sites”.

In contrast, the present proposal says, in para 3.48, only that protection of existing pitches is one possible strategy for Boroughs to consider. This is a serious withdrawal of support for this disadvantaged community.

Section 1.3 of the previous report argues this case. Two additional points are made here:

The Integrated Impact Assessment on the 2nd alteration, using the 2008 adopted London Plan as the baseline, completely misses this point and should be corrected to record a significant detraction from the IIA objectives of ‘Health and Well-being’, ‘Equalities’ and/or ‘Housing’.

Recent LGTU research, pictured below, shows that 25% of those social pitches¹⁸ existing in 1996 have subsequently been closed. Protecting pitches from closure is vital.



¹⁷ LGTU assumes that this can be translated into the simpler “existing pitches should be protected”.

¹⁸ Social pitches make up about 95% of London’s authorised pitches.

3 Policy and evidence

3.1 Planning policy for housing

The statements in PPS3¹⁹ on planning for housing cover the GLA. And the actions of the Mayor, for example in conducting Housing Market and Land Assessments, clearly show that he accepts this for most things. Not, though, for Gypsy and Traveller policy. However, there is nothing in the Statement that suggests that the Mayor can disregard his duties under s21 or Annex C. There is nothing in the SHMA Practice Guidance²⁰ that suggests he can disregard a particular aim/objective if it takes his fancy. “Some ‘questions and answer’ advice on immediate issues” by CLG [1020a] does not suggest this either. It does not over-ride PPS3 or the Practice Guidance on what makes a good SHMA²¹.

The overarching intention of PPS3 and the SHMA Guidance that “the requirements of Gypsies and Travellers should be considered alongside the other household groups identified here” is absolutely clear. In clear opposition to this the present policy sidelines the assessment of Gypsy and Traveller needs and makes no attempt to incorporate them into the London SHMA (as its para 6.4 makes clear) or the GLA’s planning policy for housing.

Three points arise from this:

First, the GLA should correct the current SHMA to incorporate the “diverse range of requirements across the area, including the need to accommodate Gypsies and Travellers” and “Consider future demographic trends and identify the accommodation requirements of specific groups such as,..... Gypsies and Travellers.”

Second, as an authority updating its SHMA, or developing a new one, it should rework its approach to the GTAA in the new para 3.48 of the Plan to give a platform for gathering a consistent set of data to fulfil its duties under PPS3 and abide by the Practice Guidance in future.

Third, this should be done so as to conform to the Equalities Act 2010, avoiding a partial and discriminatory application of PPS3 and the Practice Guidance.

¹⁹ Planning Policy Statement 3: Housing [DCLG 2010] para 6

²⁰ SHMA stands for Strategic Housing Market Assessment

²¹ especially given the confusion in section 14 over whether the London Plan is an RSS or not

The background documents in this regard are:

PPS3 [DCLG 2010] states, under *Achieving a mix of housing* that

21. Regional Spatial Strategies²² should set out the region's approach to achieving a good mix of housing. Local Planning Authorities should plan for a mix of housing on the basis of the different types of households that are likely to require housing over the plan period. This will include having particular regard to:

.....

- The diverse range of requirements across the area, including the need to accommodate Gypsies and Travellers.²³

Annex C: *Evidence Base* states that

A Strategic Housing Market Assessment should:

.....

- Consider future demographic trends and identify the accommodation requirements of specific groups such as,..... Gypsies and Travellers

Practice Guidance on Strategic Housing Market Assessments (SHMA) [DCLG 2006] states in its overarching Aims and Objectives, that a SHMA

considers how local authorities can understand the requirements of specific groups The requirements of Gypsies and Travellers should be considered alongside the other household groups identified here.

Ch 6 on the housing requirements of specific household groups explains that

There are several reasons why housing market partnerships should consider gathering information about the housing requirements of specific household groups, and why doing so will improve planning and housing policy, including:

- The Race and Equality Act requires Government and local authorities to assess the impact of their policies on different ethnic and minority groups,
- Particular groups may be ill-suited to their dwelling type over the longer term

The **2008 London Strategic Housing Market Assessment** [GLA 2009] in its chapter on *Understanding Specific Sub-group Needs* recognises, in paragraph 6.4, that it has not considered Gypsies and Travellers. There is a short section on Gypsies and Travellers which, unlike the discussions of the other groups, is procedural apart from the two substantive statements that:

6.64 It is widely recognised that there has been an under-provision of adequate accommodation for gypsies and travellers in London and other regions, and that this has contributed to very poor health and educational and economic outcomes for these communities.

6.67 a London-wide GTANA, which identified a need to approximately double the current number of gypsy and traveller sites in London over the next ten years.

²² Para 6 explains that this includes the Mayor of London in preparing the Spatial Development Strategy for Greater London.

²³ Circular 01/06 *Planning for Gypsy and Traveller Caravan Sites*, ODPM, 2006.)

3.2 A robust GTAA

Arguments about the 2008 GTAA are still important because it is a robust assessment and the best available researched evidence of need in London. The GLA is potentially setting local policy on pitches back some 5 years and promoting a less evidenced-base outcome by not recommending the GTAA to the boroughs.

Paragraph 3.48 of the policy now simply quotes from “*some ‘questions and answer’ advice on immediate issues*” issued by CLG [1020a]

“Gypsy and Traveller Accommodation Assessments (GTAAs) have been undertaken by all local authorities and if local authorities decide to review the levels of provision these assessments will form a good starting point. However, local authorities are not bound by them”.

Although the GTAA forms a sound evidence base for policy (whether at borough or GLA level), the GLA looks set to advise Boroughs actively against it: The details of the GLA’s sudden opposition to the GTAA were topped off with a new accusation in the paper accompanying the 2nd alteration: that the guidance sought “spurious levels of accuracy” and were rehearsed by GLA officers at the technical seminar of October 2010.

The main GLA argument can be found in the explanatory note to the 1st alteration. The LGTU response in this regard is given in section 3 [pps 15-24] of the previous submission. We are sad that the 1st alteration’s Explanatory Note is a new and baleful low in our experience of objective planning argument.

Here we give a gloss in the light of the 2nd alteration. A point of clarification: Within the argument around the GTAA and targets it is useful here to separate the issues of

- 1) the robustness of the GTAA as evidence of need (usually more technical), and
- 2) the decision of what target should be set on the basis of this need (usually more political)²⁴.

We are here concerned with the first. Our points are that

- the GTAA is, objectively, robust, and
- the GLA unacceptably put politics before evidence in its new technical opposition to GTAA.

Section 4 partners this one by triangulating on the GTAA with an analysis of the submissions by Gypsies and Travellers, the effects of past closures and other sources on need.

The GTAA is sound

Section 3.5, “Survey Method” in the previous submission (pp20-21) argues that the survey was sound. We would make four extra points:

First, The GTAA was assessed as being fit-for-purpose (see appendix A)

Second, as a piece of coherent pan-London research, it should not be lost.

Third, the GTAA must be judged alongside other surveys of minority communities, of which the London SHMA [GLA 2009] recognises

- 6.6 It is also important to recognise that because many of these groups only represent small proportions of the overall population, some of the data available may be based on relatively small samples and should therefore be treated with appropriate caution.

²⁴ Sections 3.7 and 3.8 of the previous report deal with this.

The findings on these other groups are accepted and reported properly in the SHMA and the London Plan. Not so for Gypsies and Travellers even though the proportion of people from this community who have provided evidence is high.

Fourth, LGTU also takes the opportunity to reinforce that the fixation with 'proven aversion' is a red herring: Housing and planning policy should consider the need of a Gypsy or Traveller family for a pitch whether or not the cause is labelled 'proven aversion'. This follows from

- The Equalities Act 2010: The policies of the GLA must have a due regard to the need to advance equality of opportunity between Gypsies and Travellers and others; in particular the need to take steps to meet the needs of Gypsies and Travellers that are different from those of others.
- PPS3 [DCLG 2010b], the Practice Guidance on Strategic Housing Market Assessment [DCLG2007d] and the Guidance on Gypsy and Traveller Needs Assessment [DCLG 2007c] (**regardless of** para 15 which mentions aversion (in parentheses)).

Whether or not it uses the term 'aversion' the GTAA fulfils these requirements.

GLA puts politics before evidence

The submission of the London Gypsy and Traveller Forum shows that the GLA's disowning of the GTAA process is disingenuous. The GLA was heavily involved throughout and the London Plan is wrong to withdraw support.

The history of the GLA's recent attitude to the GTAA is most reasonably interpreted as an attempt to reverse a professional view of a technical matter for political ends: the result of the survey did not, in the end, nourish the 'collegiate approach' so a new result was needed.

This view is reinforced by the history of the GTAA and the GLA over the last two and a half years: The GTAA was published in March 2008. The GLA used it to inform the:

May 2009	Draft Housing Strategy
Mar 2009	Consultation with Boroughs round 1
July 2009	Consultation with Boroughs round 2
Sept 2009	Consultation with Boroughs round 3
Oct 2009	Draft London Plan
Nov 2009	Housing in London – the evidence base
Feb 2010	Housing Strategy

Through all this, there was no murmur of concern at the GTAA methodology from the GLA. Except once: The background paper accompanying the 2nd consultation stated

Some respondents (*it was LGTU*) expressed concern over the robustness of the GTAA methodology. It was noted that that the GTAA calculations had been made on the assumption that provision proposed in three boroughs would come forward when this does not appear to have occurred. To provide an opportunity to address this options have been prepared which raise the London-wide maximum need figure to 811 and the mid point need figure to 541.

In addition it was noted that a minor statistical error in the second round consultation had a particular bearing on one borough. This has been corrected

Then in January 2010 the GLA Conservative group issued a paper opposing the policy for Gypsies and Travellers and in March 2010 the 1st alteration appeared announcing the GLA's volte-face on the robustness of the GTAA. Such a change might be legitimate, though wrong, if it were announced as a political U-turn on, say, the extent of need that should be met. But it is not legitimate to make the survey fit the convenient result.

3.3 A GLA role

Assessment

We argue above that the 2008 GTAA was fit-for-purpose. Here we argue that the GTAA is best undertaken at the pan-London level. A consistent London-wide approach makes obvious sense especially since too many Boroughs have shown themselves to be unwilling or incapable of providing sensible data. The GLA needs to take a lead.

- Technical judgements from the RSS EiP's have referred to inconsistencies between District/County assessments and have looked jealously at the pan-London GTAA
- London is a single 'pitch market area'. "Assessments should be prepared collaboratively with stakeholders. Where two or more Local Planning Authorities form a housing market area, Local Planning Authorities should work together either by preparing joint assessments or by ensuring consistency in methodology." Annex C of PPS3
- It will be increasingly untrue that Boroughs will have accurate data on need. Only 5 have something like an effective waiting list (see 6.2 of previous LGTU report) and the major repository of what knowledge there is will be lost with the disbanding of Traveller Education Services.
- Some Boroughs are unable or unwilling to be involved in open GTAAs. For example Bexley claims to have done a GTAA which it refuses to publish and steadfastly refuses to recognise any need in spite of evidence to the contrary..

Monitoring pitch numbers

Section 6.1 of the previous report called for significantly better monitoring of pitch numbers by the GLA. The inadequacy of pitch data will be exacerbated, rather than mended, by the GLA relinquishing its leading role in London's GTAA. The GLA could easily, cheaply and effectively take a lead in producing, or monitoring the quality of, a robust data set on pitches in London. It is relatively easy to collect accurate data on the 95% of authorised sites that are socially owned. The private sites are concentrated in 2 Boroughs.

- "there is a high level of uncertainty regarding the quality and consistency of the information provided by boroughs over the past ten years regarding sites" [Entec 2010 p19]. There is still a lot of ignorance about how many pitches there are at currently. This calls for a lead in both assessment and monitoring. The returns on the Caravan count are appalling and the most significant difficulty for the GTAA consultants was getting useable data out of the Boroughs. Two examples of the effects of this are given in appendix B.
- In particular, pitch closures and termination of planning permissions are going to continue and they have, in the past, gone unnoticed. However their dramatic long term effect on overall pitch numbers has been shown.
- In its own policy documents the GLA should use data from Table 2 of the Caravan Count in place of Table 1 wherever possible. The description of trends given in the Evidence Base for the London Housing Strategy is wrong and is based on bad data. Appendix B illustrates this.
- The GLA has joint responsibility with the boroughs for this new Core Output Indicator H4 *Net additional Gypsy and Travellers pitches*. This will help, especially if its accuracy is monitored and guidance given to Boroughs. The GLA should use this role to work for consistent and good practice in the returns for this data. As a significant step to support this and to give policy 3.8i some standing, table 8.1 of the Plan should include H4 as a KPI.

4 A real need

The purpose of this section two fold. First, to triangulate with the GTAA with further evidence that it is a fit for purpose as a basis for a policy on pitch provision. Second, to reinforce the picture, given in sections 3.5 and 6.3 of the previous submission, of the wider understanding of need for pitches that is intended in the Government guidance.²⁵

Section 3.6 of the previous report discusses and gives evidence of need that results directly from the poor past record. It estimates that some 850 of today's households will have had personal family experience of a loss of their pitch over the last 20 years. This supports the figure given by the GTANA of a backlog of need amongst housed Gypsies and Travellers of some 500 households.

4.1 Evidence from the community

Appendix 1 of the previous submission gave the results of a consultation meeting with Gypsies and Travellers in April 2010 and that should be read alongside this submission.

We give a summary below of a full report and analysis of the submissions of the 48 Travellers and Gypsies who responded in writing to the consultation on the DRLP and alterations. Participation was encouraged and facilitated by staff of the London Gypsy and Traveller Unit to ensure a broad cross-section of the community took part and a range of views were expressed.

The full report is lodged with the EiP library.

The evidence at a glance

- All respondents considered the provision of more pitches for Travellers and Gypsies to be a pressing need, and, where an opinion on the lowered pitch target of 538 was expressly stated, all the letters judged this to be inadequate to serve the growing needs of the community.
- Every respondent expressed a view on the unsuitability of 'bricks and mortar' housing for the Traveller/Gypsy community. The specific problems with houses cited varied in substance and mode of expression, but their unsuitability was either implied or explicitly stated, regardless of the author's own housing situation. Being housed was not seen as an adequate or appropriate solution to lack of site provision.
- The number of respondents forced off sites is an indicator of need – nearly every letter tells this story, either from their own direct experience or that of family members. See below – 43 out of 48 letters (89.6%) referred to families being forced off sites and into bricks and mortar accommodation.
- The number of responses from the housed community is in itself an indicator of the level of need. 52% of the responses came from individuals or families living in houses or flats²⁶. This supports the assertion (made in Fordham 2008)²⁷ that those who did not state in the GTAA they were 'dissatisfied' with their current home may have not have done so as a result of knowing there was a lack of alternatives.

²⁵ That is to say, the guidance on GTAA's and SHMA's

²⁶ Of the total sample, 4.4% stated they were living in a transient manner in houses, 47.9% were housed, 41.3% were living on sites and 6.5% stated they were moving around/living on the roadside or staying temporarily on sites with friends or family.

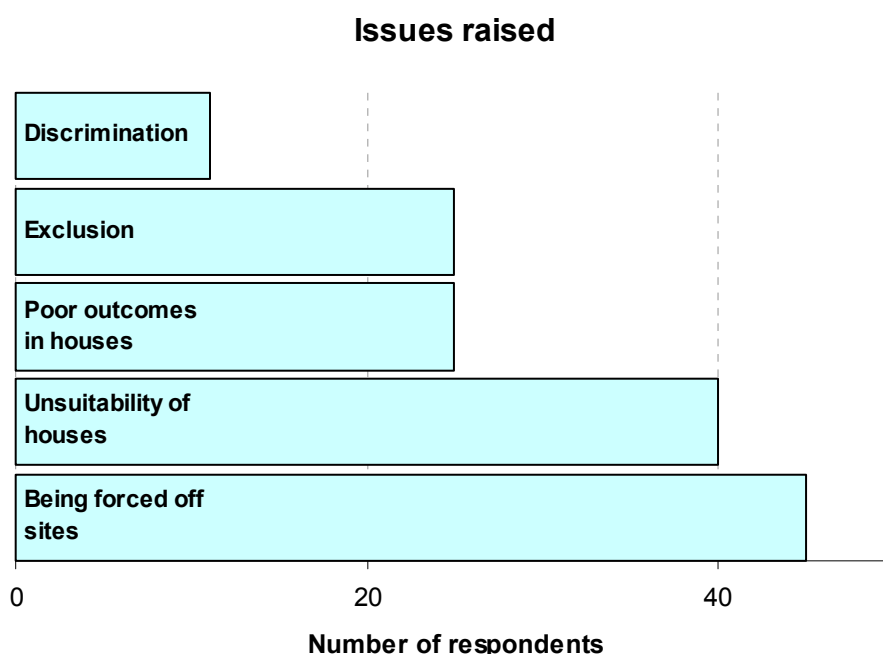
²⁷ 'London Boroughs Gypsy and Traveller Accommodation Needs Assessment Final Report', Fordham Research Group, 2008.

- There is detailed communal knowledge about the scale of the need, including the need arising from the large number of families presently dwelling in houses as a result of having nowhere else to go.²⁸ There is a clear sense of collective concern from all parts of the community – irrespective of the writers’ accommodation situation. This is illustrative of the vulnerability of the community and culture as a whole, and demonstrates the mistaken distinction made between families in houses and families on sites (‘...the false premise that they are, somehow, different sorts of people’ *LGTU Objection to The London Plan*, May 2010, p2).

“Moving into houses doesn’t change who we are. We are still Travellers and that’s what we want to be”.

- Concern is expressed not just with the lack of adequate accommodation for family and friends, but with the gradual annihilation of a culture and way of life. There is a sense of being coerced and trapped into somehow ‘not being’ Travellers, and with a people being squashed out of existence and deracinated by policy decisions *“Being forced to live in houses and flats is taking the Traveller culture away from us.”*, *“We ask you to take our culture into account and not let the Traveller way of life disappear”.*
- The historical lack of provision, discrimination, deprivation, hardship and inequitable processes are well detailed in the letters and provide a rich and explanative background to the current shortage. The community’s story contextualises their current demand for site provision as achieving previously denied equality, justice and fairness and correcting past wrongs.

The chart below gives an overview of some of the common issues raised in the evidence:



²⁸ See ‘Other Studies’ section of the full report for further discussion of this predicament.

Broad Themes

The distinction made between housed and pitch dwelling Travellers and Gypsies is misguided and irrelevant. As one letter puts it; *“Moving into houses doesn’t change who we are. We are still Travellers and that’s what we want to be”*.

These themes are explored in depth in the full report, but the following list provides an overview of the main recurrent themes in the letters:

1. Scale and Urgency of Need:
 - 1.1 Scale of Need
 - 1.1.1 Targets too Low
 - 1.1.2 Access to pitches
 - 1.1.3 Exclusion of Housed Families
 - 1.2 Urgency of Need
2. Forced move into Bricks and Mortar
3. Unsuitability of Bricks and Mortar accommodation
4. Discrimination and prejudice faced in Brick and Mortar accommodation
5. Exclusion and being forgotten
6. Poor outcomes for families living in Bricks and Mortar accommodation
7. Idea of ‘Home’ and Moving; meanings and aspirations
 - 7.1 Home and belonging
 - 7.2 Moving and permanence
 - 7.3 Forced Transience
8. Culture/Identity Loss
 - 8.1 As ‘Gypsies’ or ‘Travellers’
 - 8.2 As ‘Londoners’
 - 8.3 Heritage/Culture
 - 8.4 Children
 - 8.5 Living in a caravan amongst their own as an essential part of cultural identity for Gypsies and Travellers
9. Participation in the wider community, the consultation process and in decisions affecting them
10. The idea of ‘waiting’ for pitches to be provided and the accompanying likelihood that families will begin leaving houses for the road once it becomes clear that this has been in vain

Concluding remarks

Other ideas expanded in the letters which are worthy of mention are listed below:

The community's self-sufficiency and independence that can thrive on sites which are well-managed: *"We can run our lives much better and even we don't need so much help from the council now."* The pressure on welfare and support services will be reduced when Travellers are allowed to live on well managed sites and operate through systems of mutual and reciprocal support.

The above, coupled with statements about contributing to the wider community demonstrate the alignment of the Gypsy and Traveller community with the Coalition government's 'Big Society' and Localism agendas. Traveller communities exemplify the types of self-organising, pro-active and self-helping communal structures the government wants to promote: *"We have a lot to give to the wider community because family and looking after other people is important to us."* In the longer term, site provision will support the sustainable and cost-effective building of stable, cohesive and thriving communities.

However, instead of being supported in the creation and maintenance of these self-reliant and very sociable communities, the letters send a clear message of a group being squeezed out of society, of a culture and identity on the brink of destruction: *"The way its going in 50 years we will be extinct", "[I] have no hope for the younger generation growing up."*

4.2 LGTU experience

The LGTU, through the advice and support that it has offered them since 1998, can confirm the alienation and deprivation that is suffered by many housed Gypsies and Travellers. The following are the types of problems faced by LGTU clients:

- Discrimination and harassment from neighbours, so that many families are frightened to self identify as Travellers. Children are often targeted.
- Discrimination and prejudice from housing officers, including refusal to deal with homelessness applications, public use of terms such as Pikey, leaving clients to wait for up to 5 hours.
- Social isolation from the support of the extended family. This is particularly difficult for young families who marry very young and in the past would have relied on the support of mother, aunts or older siblings. Travellers cannot rely on access to mainstream services for support.
- Mobility-Travellers in houses are more mobile than those on authorised sites. Sometimes they allow themselves to get into housing crisis, leading to eviction, or just move away in order to address their sense of alienation. Many of the larger families are put in the private rented sector where they have no security of tenure and get moved around often on a 6 monthly basis
- Poor literacy means that many families are severely disadvantaged in understanding communications from their landlord. They are rarely treated as vulnerable tenants
- Depression and anxiety, particularly amongst the women.

4.3 Other Studies

The findings of this analysis are consistent with other pieces of research conducted into the living situations of Travellers and Gypsies. Among the many useful contributions, the report cited below is considered particularly pertinent given the geographical base for the study and the recent date of the work:

West London Housing Partnership's report '*Working with housed Gypsies and Travellers: A Good Practical Guide*' was published recently, having been referred to in a number of the submissions by the Boroughs. It supports many of the points raised in the letters. These are expanded upon below:

1. **Poor outcomes for housed Travellers, particularly women:**

"There is considerable evidence of poor outcomes for Gypsies and Travellers living in housing, including homelessness, family breakdown and domestic violence. Health status is worse among housed Gypsies and Travellers compared to other Gypsy and Traveller groups, especially anxiety and depression, thought to be prompted by exposure to racism from neighbours and detachment from site-based support networks. *Isolation can be particularly intense for women who often lack employment-based opportunities to meet other people and spend much of their day-to-day lives in isolation rather than among a community on a site.*"²⁹

2. **Increased vulnerability to discrimination and racism in bricks and mortar accommodation:**

"... particularly those in privately rented housing, reported living in poorly maintained housingThe move into housing was also perceived to put Gypsies and Travellers into a more vulnerable position when dealing with the settled community. Many felt that living in housing exposed them and their children to increased levels of prejudice because of lack of acceptance from wider society towards Gypsies and Travellers. This prevalent theme was discussed by nearly all of the participants."³⁰

3. **Difficulties in securing long-term, stable tenancies:**

"Gypsies and Travellers often live in poor quality and overcrowded housing, with increasing numbers at the lower end of the private rented sector.... the high turnover of tenancies in Gypsy and Traveller households"³¹

4. **Lack of mitigation of difficulties through adjustment to living situation over time:**

"...others argued that negative psychological effects of living in housing did not always lessen with time. Such long-term effects included depression, reflected in

²⁹ West London Housing Partnership, *Working with Housed Gypsies and Travellers: A good practical guide*, 2010, p13 (emphasis added).

³⁰ *Ibid.* P47

³¹ *Ibid.*, p13, p37

higher suicide rates amongst housed Gypsies and Travellers, the high turnover of tenancies in Gypsy and Traveller households, and family breakdown.”³²

5. Poor access to (culturally appropriate) services in conventional housing:

“...detachment from the informal support networks available on sites which is especially missed when moving into housing, for example, with reading mail or getting advice about contacting service providers.” (p17) “The relative invisibility of Gypsy and Traveller families once they make a move into housing is noted as one of the major barriers in providing support services.”³³

6. Identity and site dwelling:

“*Gypsy Identity and Orientations to Space* (2004) offers an insight into the political and social dimensions of living on sites and housing. The paper identifies the idea of ‘the road’ as central to the ideology and identity of Gypsies and Travellers; even for those who no longer travel connection to a travelling way of life is seen as key to asserting one’s identity. The link with travelling and trailers, the paper notes, gives a sense of autonomy to travellers which allows them: “The power to transport themselves around, to define their own living space and reassert control””³⁴

Margaret Greenfields & David Smith’s paper ‘Travellers, Housing and the (Re) construction of Communities’ provides further evidence of many themes discussed here, and reiterates the crucial role of living on sites in maintaining ethnic identity:

“Many housed Gypsy and Travellers experience the denial of ethnic identity acutely. Several expressed a concern that ‘the worst thing is when you move into the house they count you as settled you’re part of the population, you’re not a Gypsy anymore because they put you into a house’ and were concerned that their identity is not always recognised as ‘authentic’ by others, both Gypsies and Travellers and by the wider society.”³⁵

University of Sheffield ‘The Health Status of Gypsies & Travellers in England Report of Department of Health Inequalities in Health Research Initiative’ 2004 recognises that “Those who rarely travel have the poorest health.”³⁶

³² *Ibid*, p37

³³ *Ibid*, p17, p20

³⁴ *Ibid*, p32

³⁵ Greenfields, M, & David M. Smith, (2010) ‘Housed Gypsy Travellers, Social Segregation and the Reconstruction of Communities’, *Housing Studies*, 25: 3, p405.

³⁶ Parry, Glenys, Patrice Van Cleemput, Jean Peters, Julia Moore, Stephen Walters, Kate Thomas and Cindy Cooper, (2004), *The Health Status of Gypsies & Travellers in England Report of Department of Health Inequalities in Health Research Initiative*, p1.

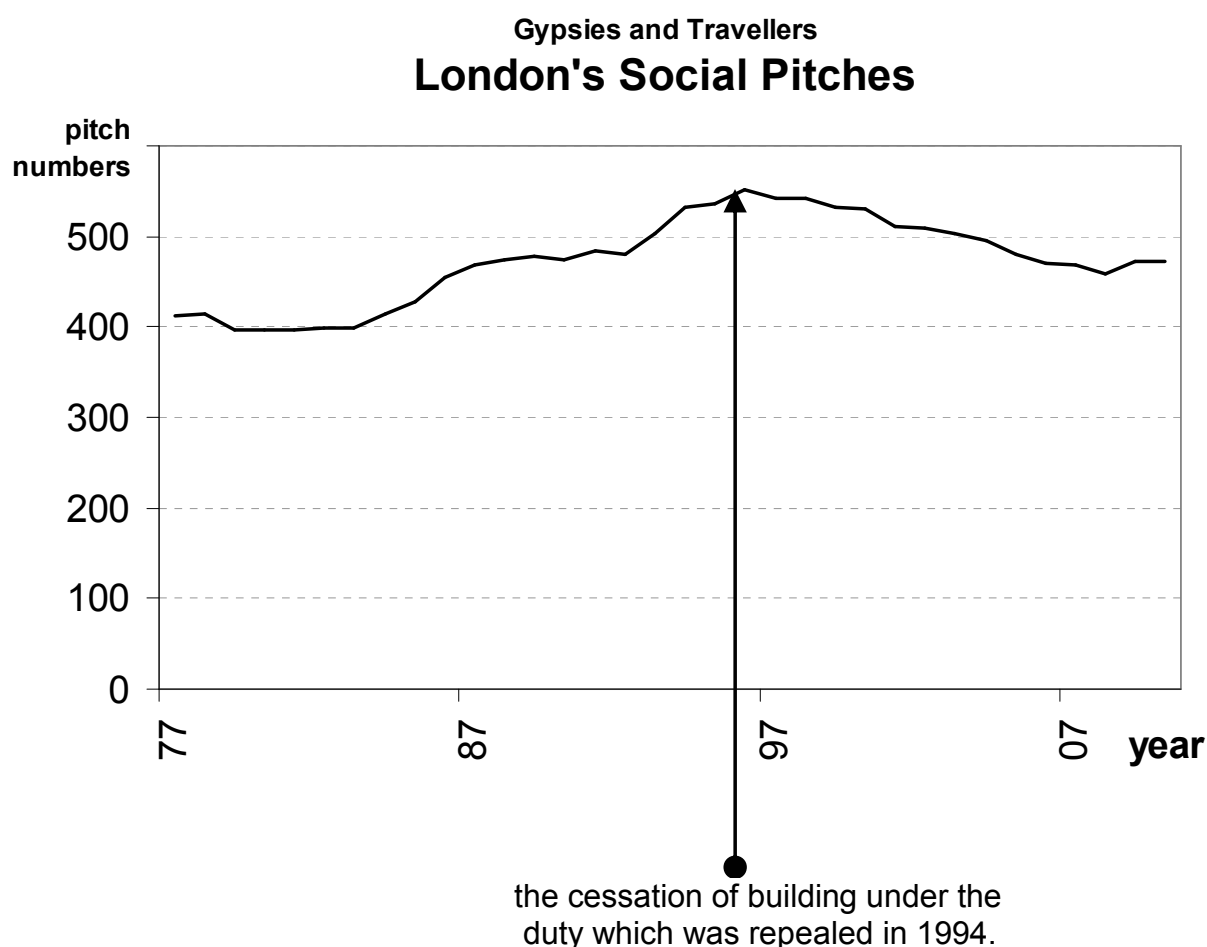
5 Performance benchmarks

LGTU believe that, in this highly contested policy, Borough benchmarks, akin to targets, set at the GLA level are the way forward. Some reasons are as follows.

1. The Mayor has stated

As London has not had formal traveller pitch targets, there can be no evidence that their removal will have the effect you suggest³⁷ (of allowing Boroughs to continue to set their own targets at zero).

This is not true. Up until 1994 there was a minimum target of a 15 pitches per Borough. And the evidence of the effect on pitch provision is given in the graph below.



2. The complete self-determination of local targets contradicts the logic that needs can properly be met where they don't arise.

³⁷ Written answer to Mayors question 3298 / 2010

3. Special pleading will lead to an inconsistent set of local targets which has no basis in the reality of local circumstances but is the worst kind of post-code lottery.
 - Bromley LB contends that its high current pitch provision should reduce its target, while Barnet LB and Westminster LB argue that their lack of sites should reduce theirs.
 - Barnet LB, with its low housing density, argues that too much weight is given to land availability, while high-density Tower Hamlets LB reasons that too little weight is given to its tight land supply.
4. In terms of equity, Haringey LB complains that "It is not clear why Haringey is allocated more additional pitches than some of our neighbouring boroughs" and Greenwich reasons that the amount built in a Borough should "make up' for where pitches have been lost over the last decade. Only after pitches have been added to the 'shortfall' boroughs should the remaining pitches need be redistributed across all the Boroughs. It is this approach which will bring equity to the distribution."

Other Boroughs make similar points and it is clear that, without regional targets, most Boroughs will have little trouble justifying a set of inconsistent but politically easy local targets that continue to ignore the needs of Gypsies and Travellers. Equity between boroughs pre-supposes a supra local authority.
5. The way in which targets are a barrier to implementation – an end in themselves – is a mystery. Do Borough leaders refuse to play *because* they have been set targets? More likely that they would complain a lot and then get down to it. On the other hand, behavioural observation could lead one to understand why a collegiate approach might easily become an end in itself.

Appendix A Assessment of GTAA fitness-for-purpose

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Lesley Mallet
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Dear Lesley

London Boroughs' Gypsy & Traveller Accommodation Needs Assessment

Thank you for your e-mail in response to my note on the benchmarking of the London GTANA. You ask about the assessment being fit-for-purpose.

I can confirm that the assessment complies with CLG Guidance and has incorporated sound survey methods. The model used for estimating pitch requirements includes the appropriate elements of need and supply. The assessment endeavours throughout to distinguish 'need' from 'demand' or 'aspiration'. This influences the assumptions made in the calculations which are relatively stringent but appear justifiable. On this basis, the GTANA is fit-for-purpose.

This statement is not equivalent to saying that the GTANA provides the sole 'correct' estimate of requirement – in the current state of knowledge about Gypsy and Traveller accommodation needs in different parts of the country, it is impossible to state categorically that a particular assessment is 'right' or 'wrong'.

Yours sincerely

Pat Niner
Senior Lecturer

Appendix B Poor data

Below are examples of errors in trend analysis derived from unchecked bad data from the Caravan counts.

1. Announcement of a 10% (70 vans) increase in vans on social pitches in London Jan 2007-Jan 2008

This seeming good news was announced in Brown and Niner [2009], which judged that London showed some growth in provision.

However the report used unchecked Table 1 figures and closer inspection reveals the following errors in the returns from 7 boroughs where there was actually **no change** in pitch numbers.

	2007 Jan Borough return	2008 Jan Borough return	Indicated increase in vans	actual increase in pitches
Harrow	3	54	51	0
Kingston	0	31	31	0
Brent	40	66	26	0
Southwark	45	62	17	0
Sutton	19	35	16	0
Bexley	10	0	-10	0
Tower Hamlets	34	27	-7	0
		Total	130	0

There was actually a reduction of about 2.5% in pitches

2. Announcement that there was a 5% (30 pitches) decrease in Council pitches in London 2000- 2010

This was the diagnosis of the IIA on 2nd alteration [Entec 2010]. This report used unchecked table 2 figures and closer inspection reveals that the IIA fell prey to an acknowledged miscoding by Bromley of zero during 2000 when their 36 sites were transferred temporarily to the RSL Novas. This error alone meant that the IIA underestimated the pitch reduction by 50%.

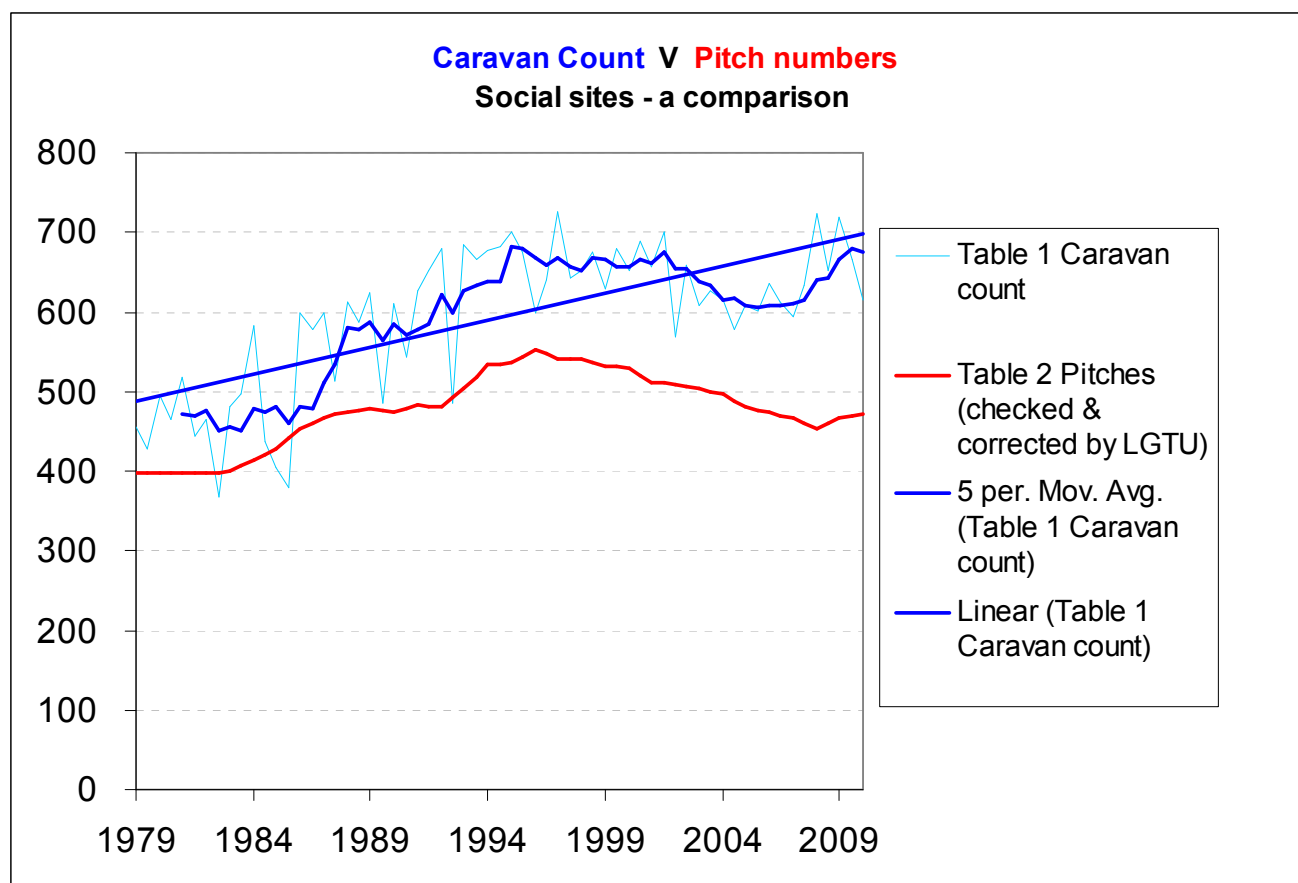
Caravan Count: Table 1 V Table 2

Raw data from the Caravan Count Table 1 (*caravans*) is often used as a proxy for pitches when investigating trends on which to base policy. For example the Evidence base for the London Housing Strategy uses this data as justification for saying “The number of Gypsy and Traveller caravans on sites has remained fairly constant in recent years, but will need to increase

There is a much better alternative that covers 95% of the pitches in London – Table 2, which counts the number of *pitches* on each social site. Given that some 95% of all pitches in London are social, this is a very good starting point.

The graph below compares the raw data from Table 1 for caravans on social pitches in London with the checked and corrected data from Table 2. The trend lines through the Table 1 data are added to illustrate the impression given by the trend.

The GLA should use corrected Table 2, as the data on social sites, in order to illustrate the trends in London and to develop appropriate policy



References

This list covers only those texts that are not listed in the previous submission.

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