

H16

- A. Boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches.

Mobile Homes Sales and Management Ltd (MHSM) in collaboration with Continental Holiday Homes, are a national mobile home provider; and site acquisition and management company. MHSM are committed to providing decent and suitable mobile home accommodation for Gypsies and Travellers; and those traditionally settled communities that are seeking a mobile home solution to their accommodation needs. MHSM have tenants in more than half of all local authorities in England, Scotland and Wales. This national portfolio helps inform a wide perspective on Gypsy and Traveller sited provision across the UK.

This London Plan comes at a time of crisis in Housing, with rapidly increasing homelessness, and a changing London demographic that is an increase of the young and old. This context presents significant challenges to the Plan. A review of homelessness by the national charity Shelter (Nov 2017) is verified unmistakable evidence that the accommodation crisis is mounting. The study reveals that more than 300,000 people in Britain are now homeless, this is 1 in every 200 people across the UK. This is particularly acute for Greater London as this is shown as the worse affected area. The 10 local authorities with the highest rates of homelessness and 18 of the top 20 are all within the capital.

For most of the last decade London's population has continued to grow at above 1% of the national average. With an increasing population, the demand for homes and land to build them on is great. In the Strategic Housing Land Availability Assessment, land is earmarked for 65,000 new homes, but this does not include land for Gypsy and Traveller sites. Councils are under pressure to build the new housing, which leaves a limited supply of land for any new Gypsy and Traveller pitches. The London Plan must require councils to identify land and incorporate a rolling 5-year supply of land updated annually, in line with the Governments general housing requirements.

MHSM are strong supporters of Policy H16 as a significant step in the right direction, although identifying that to meet the needs of Gypsies and Travellers it must go further. MHSM would strongly recommend the plan identifies and indicates how it will ensure the delivery of new sites for the growing population. It could be that it is useful to apply the same kind of rigour to Gypsy and Traveller accommodation, as is given to general housing policies: in terms of an evidence-based approach to delivery and monitoring. The Plan should make explicit how it will monitor the progress of London Boroughs in ensuring new decent suitable Gypsy and Traveller provision in London is delivered.

Historically, even when funding is available, London Boroughs have failed to implement policy and deliver new site provision. A report by London Gypsies and Travellers (2016) into research of London Boroughs implementation of PPTS concluded: 'that whilst this could have seen a steep change in meeting Travellers' accommodation needs, instead 'in London the policy was effectively thwarted by Local Authorities who with few exceptions did not undertake collaborative work with Gypsy and Traveller organisations or with neighbouring Local Authorities, produced needs assessments that underestimated actual need and did not identify and allocate land for new Traveller sites.'

This experience is born out again and again in practice. Tactics employed by decision makers to stall the planning system meeting the needs of Gypsies and Travellers: such as separate Gypsy and Traveller Local Plans, that allow Core Strategies to go forward, whilst Gypsy and Traveller site provision may be handled alternatively. Following Fordhams (2008) London wide Needs Assessment; Kensington and Chelseas' Core Strategy had a bold vision to meet the identified need. A decade on and despite numerous DPDs, Needs Assessments, Site searches, land identified for delivery and many tens of thousands of £'s of officer and legal costs: no additional

site provision has been provided. This serves to frustrate a community that is constantly promised that their needs will be taken seriously by all parties. A story that is echoed across London. As demonstrated in the 'London Gypsies and Travellers (2016)' research, less than one third of London boroughs had undertaken a 'Needs Assessment' since 2012 despite a legal requirement to do so.

In London, meeting the Gypsy and Traveller Accommodation need, has in the past been perceived as the 'Gypsy and Traveller issue'. Other areas of the country are taking very different approaches to delivering their Gypsy and Traveller site provision. In Buckinghamshire, for example, five of the Local Authority sites have been successfully privatised. In Leicester, there is a Mobile Home Park that has mixed communities of those traditionally 'settled' families and Traveller and Gypsy' tenants. In Norfolk, Transit Provision is being turned into a permanent site: again, for mixed communities of 'settled' and 'Gypsy and Traveller' communities.

Given the failure of successive governments to adequately address the needs and human rights of Gypsies and Travellers, this London Plan should be driven by delivery. A comparable approach to housing delivery should be taken in the London Plan – through securing new pitches in larger residential schemes, supporting housing associations, charities and developers to make provision for Gypsies and Travellers, so they are not pushed onto the worst pieces of land which are left over from plan creations that are driven by housing.

MHSM would ask that the Plan make explicit the opportunity for London Councils to properly engage with the private sector to help deliver more provision. The private sector has a significant role to play in helping meet Housing Needs nationally and that should especially be encouraged in the London Plan for Gypsy and Traveller accommodation too as a corporative and cost consideration for Councils integrated with and affected by the London Plan.

At present private provision for the accommodation and sites of Gypsies and Travellers is less common in London, although there are Boroughs where community members have been able to purchase low cost land in the Green Belt for this facility. MHSM believe that the Plan should allow for some flexibility on Green Belt land where councils are unable to identify other suitable locations.

This plan has the potential reverse what has traditionally been perceived as an issue on its head and embrace more mobile provision for Gypsy and Travellers, whilst also addressing needs for traditionally settled communities that are seeking affordable or appropriate accommodation..

- B. 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, or living in a caravan, whatever their race or origin, including:

MHSM welcome the Mayors bold statement to challenge the governments poorly defined definition. However, the definition could perhaps be broadened to include Travelling Showpeople and Travelling Bargee.

1. those who are currently travelling or living in a caravan
2. those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation
3. those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently.

C. Boroughs that have not undertaken a needs assessment since 2008 should either:

MHSM might suggest that using the 2008 GTANA figures as a 10-year identified need is not necessarily the most efficient approach. This is because historically a percentage of councils had identified a very low figure of Gypsies and Travellers that has often been disputed and does not reflect up to date figures. However, the 2008 GTANA mid-point is a reasonable indication of backlog need and should be used as a target in the London Plan for speedy delivery over the next 5-years. The GLA could commission a new London wide study in line with the housing evidence base within the next 5-years to have an up to date assessment of need.

Whilst waiting for a London wide 'Needs Assessments' or other local delivered 'Needs Assessments' to update the Fordhams (2008) study, it could be considered a more sensible option for all the London Boroughs to start reviewing their existing Development Plan process; adopting the midpoint figure as an initial starting place. In this way conducting the 'Needs Assessment' will not in any way delay the delivery of new provisions for the London Plan.

1. undertake a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above); or
2. use the midpoint figure of need in Table 10 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.

D. Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.

E. Boroughs should undertake an audit of existing pitches and sites, identifying:

1. areas of overcrowding
2. areas of potential extra capacity within existing sites
3. pitches in need of refurbishment.

F. Boroughs should plan to address issues identified in the audits.

G. Boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

MHSM do strongly agree with 'G'. For example: in Southwarks Gypsy and Traveller site MHSM understand that a plot and the accommodation that that plot meets for tenants and potentially a family, could be lost directly as a result of redevelopment works on the Bermondsey site. This slow erosion of existing provisions for accommodation must be addressed or risk failing a growing communities need within London.

Comment on this section

4.16.1

Estimates show there are around 30,000 Gypsies and Travellers in London^[59]. Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies and Travellers try to maintain this, the **lack of pitches** on local authority sites often presents a barrier to this. Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an

unsuitability, or lack of availability of, pitches. The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.

[59] <http://www.londongypsiesandtravellers.org.uk/why-were-needed/>

Comment on this section

4.16.2

In this Plan, the Mayor has adopted a **new definition** for Gypsies and Travellers. This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:

- Gypsies and Travellers who have ceased to travel permanently due to; a lack of available permanent pitches, transit sites or stopping places; frequent enforcement action (evictions), or lack of opportunities and barriers to work
- Gypsies and Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site provision; or
- due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single mothers).

Comment on this section

4.16.3

For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current **Government planning definition**) because there are no viable options or because doing so would have a significant impact on their health, wellbeing and security of income.

Comment on this section

4.16.4

This often results in **Gypsies and Travellers not being recognised or counted in needs assessments**, with many needs assessments identifying zero need. This has a direct impact on the housing options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.

Comment on this section

4.16.5

Insufficient pitch provision can also lead to a rise in **unauthorised encampments**, with implications for the health and wellbeing of Gypsies and Travellers, community cohesion and costs for boroughs.

Comment on this section

4.16.6

The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches.

Comment on this section

4.16.7

Boroughs should **actively plan for Gypsies and Travellers' accommodation needs**, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

Comment on this section

4.16.8

To assist boroughs in meeting identified need, **Mayoral funding** will be available through the Homes for Londoners 2016-21 Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.

Comment on this section

4.18.9

If existing pitches have to be **re-located or re-provided** within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. The community should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved.

Comment on this section

4.16.10

Where **new pitches** are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.