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TLRP response to the Mayor of London's ***Planning for Equality and Diversity in London: Draft Supplementary Planning Guidance to the London Plan***

The Traveller Law Reform Project (TLRP) exists to lobby for changes to the law, and for efficient implementation of existing helpful policies, to ensure that there are adequate legal, decent residential and transit sites for Gypsies and Travellers. Its five supporting organisations are Canterbury Gypsy and Traveller Support Group, Friends Families and Travellers, the Gypsy Council, the Irish Traveller Movement and London Gypsy and Traveller Unit.

1 Introduction

TLRP welcomes the general outlines of the Draft Supplementary Planning Guidance issued by the Mayor of London in December 2006, particularly its recommendations concerning Gypsies and Travellers.

2 Statistics

The reference on page 12 to SPG Implementation Point 2b on Baseline Statistics is extremely important. As the Draft SPG makes clear in the section on Gypsies and Travellers, pages 81 and following, there is a damaging lack of accurate information about Gypsies and Travellers, and poor planning decisions can be made even with the best of intentions when the information on which they are based is inadequate. Unfortunately, Boroughs will not be able to rely on statistics from the last Census when assessing Gypsy and Traveller accommodation needs, because the 2001 Census did not include Romany Gypsies or Irish Travellers as named ethnic groups, and they would have been one of the groups who experience difficulty in filling in the form for reasons of poor literacy. Caravan counts are acknowledged to be undertaken inconsistently across local authorities with no monitoring of their accuracy, leading to a considerable underestimation of the numbers of caravans, and do not include housed Gypsies and Travellers who may wish to live on caravan sites. Careful research is needed to ensure that accurate statistics are gathered, including numbers of Gypsies and Travellers in bricks and mortar who wish to live in caravans.

3 Consultation

We welcome the Draft's recognition (page 13) that different consultation procedures are appropriate for different communities. In designing consultation procedures, London Boroughs may wish to look to the example set by the Census co-ordinator covering Hackney in the 2001 Census, when a 100% response rate was achieved for residents on Travellers' sites within the Borough because of well resourced and sensitive consultation methods.

4 Community cohesion

The Draft's comments on promoting community cohesion (pages 21 and 22) are important. It is essential to plan sites for Gypsies and Travellers which facilitate positive interaction between members of these communities and others rather than encouraging a form of social apartheid. In this context it is most unfortunate that the London Development Agency and Newham LBC have recently decided to relocate Travellers from the Clay's Lane site to Major Road Park. The site from which the Travellers are to be moved was in a location which encouraged interaction between Travellers and others, not least through shared use of Major Road Park for recreational purposes. Now that local residents are to be deprived of the use of the park so that it can be turned into a Travellers' site, Major Road is likely to become a source of ill feeling and conflict. We hope that in future planning decisions of this level of insensitivity and social destructiveness will be avoided.

5 Design and choice

On pages 28-31 the Draft SPG makes a number of very good points about the availability and good design of various sorts of housing and emphasises the need for choice. Similar points could be made about Gypsy and Traveller sites: there is a similar need for good design, variety and choice. The DCLG will soon be issuing guidelines on good design for sites, as there is currently no standard set, but unfortunately these are only advisory, not enforceable. Significantly, the 'Decent Homes' standard which applies to housing, and which is currently being inspected all around London, does not apply to Travellers' sites and is yet more evidence of discrimination against Travellers in their accommodation and at a legislative level. The results of a lack of enforceable standards can be seen in the appalling levels of disrepair and poor maintenance in sites all across London.

6 Appropriateness of sites

We strongly endorse SPG Implementation Point 4.9c on page 83, which states that sites should be appropriate for residential occupation. Gypsies and Travellers should not be expected to live in places where levels of noise or pollution would prevent the site being used for housing, and should expect to live near services and in a safe environment.

7 Accommodation needs assessments

We welcome the advice given on pages 81 to 84 of the Draft SPG about provision for Gypsies and Travellers. It is crucial that planning decisions be made on the basis of full and accurate information. We are concerned that a large proportion of the Gypsy and Traveller Accommodation Needs Assessments carried out under the Housing Act 2004 and Circular 01/06 from the then ODPM (now DCLG) have so far been inadequately researched, and we hope that the London accommodation needs assessment mentioned on page 83 will use local knowledge and be well resourced, thorough and accurate. It is important that it is completed promptly, as it is one of the later ones to be embarked on and we understand is already delayed. It is of even more importance that boroughs act on the needs identified without delay as there are years of neglect to be made up for, and 3 years on from the 2004 housing Act, not one site has been built as the result of it. We are very concerned that in other parts of England the Gypsy and Traveller pitch allocations made in Regional Spatial Strategies are being challenged, rather than carried out, by local authorities, and that some local authorities who have made accurate and far-sighted assessments of the need in their areas are now waiting for the production of a Regional

Spatial Strategy rather than using the powers available to them to act to respond to urgent need now.

8 Site management

We endorse SPG Implementation Point 4.9b on the need for effective and sustained site management. This is another area where, unlike housing, no standard is set; and where most local authority sites in London are very poorly managed, not managed at all, or managed by inappropriate departments, such as pest control, street cleaning or noise nuisance. Some sites do not see a manager for years on end. In these situations sites decline in quality, causing distress for site residents and poor relations with the surrounding communities. It should be standard practise that Travellers' sites are managed by the same agencies as other social housing in the area.

9 Health provision

We also endorse the Draft SPG's suggestion on page 83 that health service providers will need to be aware of, and able to respond to, the needs of Gypsies and Travellers. It is wrong that people living on a residential site should be classified as temporary patients or, worse, be unable to find a GP to register them for lack of evidence of address. Gypsies and Travellers have been identified as a group with a significantly lower health status than equivalent social groups, which suggests that a well resourced and proactive strategy is needed by health providers. The Hackney and City PCT have a Traveller Health inclusion worker which we commend as a model of good practise.