

## **From: London Gypsy and Traveller Unit**

January 2013

To the Planning Policy Team,

We are aware that you will be using the responses to the London wide SHLAA Call for sites to inform the preparation of your Local Plan Site Allocations. We are concerned that your Local Plan does not, at this point, comply with the Planning Policy for Traveller Sites requirement to identify a 5-year supply of land for Gypsy and Traveller sites. On the backdrop of a historical backlog of unmet need and consistent local opposition to providing for this community, the timely implementation of the PPTS is the only solution to ensure the accelerated and mainstreamed delivery of Gypsy and Traveller sites.

We understand that the SHLAA methodology excludes sites under 0.25 ha. The context of high land values, increasing density and the requirement to provide the best value for money make smaller Traveller sites the only viable option in most Boroughs. We consider it a major equality issue that Gypsy and Traveller site provision is included in the mainstream housing delivery structures. There is a strong agenda to ensure fair and equal treatment and suitable living environments to all Londoners, however this exclusion proves the opposite. The Mayor of London continues to believe that the Boroughs are in the best place to identify land and deliver sites. Therefore we wish to see the Boroughs taking action as soon as possible and starting to prioritise Traveller sites delivery.

Our recommendation is to explore the possibilities of using the databases of further identified capacity that will come forward through the SHLAA process, including small sites, potential and confidential sites and windfall capacity.

We are open to collaborate in the process of identifying land for Traveller sites and we hope the Council will take a pro-active approach in order to meet the national planning policy requirements.

**London Gypsy and Traveller Unit  
Response to the Merton Sites and Policies DPD Consultation  
26 February 2013**

We wish to make the following comments on the Merton Sites and Policies DPD regarding provision for Gypsies and Travellers and conformity with the National Planning Policy Framework and Planning Policy for Traveller Sites.

The absence of a policy to identify a supply of specific, deliverable traveller sites (justified on pages 45-46 of the DPD) does not conform to the requirement that Local Planning Authorities prepare fair and effective strategies. We are concerned that the evidence base informing the Sites and Policies DPD is not sufficiently robust and does not demonstrate the Council has met the Duty to Cooperate, as required by the NPPF and PPTS.

First of all, regarding the Research Report on Accommodation Needs (January 2013). This was conducted as part of the October 2011 event, for which we consider that some of the research methods are inconsistent and the final results are an underestimation of the real need for Gypsy and Traveller pitches. It is unclear why the analysis of accommodation need excluded Gypsies and Travellers residing outside the Borough and even Merton residents who did not provide verifiable addresses.

Furthermore, since most of the 36 respondents would clearly prefer living on a site, it is difficult to understand why only 6 households have been taken into consideration in drawing up the conclusion that there is a need for 2 private pitches and 4 public pitches in Merton. We would also question the effectiveness of the site waiting list held by the Council, given that none of these families are registered on it.

In our view, the 2008 London GTANA is a robust evidence base and the need has not decreased since it was conducted. With regards to the emphasis on the needs of housed Gypsies and Travellers, we would point out that many Travellers in London have been forced into bricks and mortar against their will because of lack of adequate site provision and their needs should be included in any assessment of need. We therefore recommend that the maximum level of need identified in the London GTANA (16 additional pitches by 2017) is used as the baseline figure to inform the Site and Policies DPD.

Secondly, the Sites and Policies DPD fails to demonstrate how the Borough has collaborated with neighbouring authorities in assessing need and identifying land for Traveller sites, as required by the Planning Policy for Traveller Sites (paragraphs 6 and 9) and National Planning Policy Framework (paragraphs 178-181). While there is a claim that the Council has worked with South London Boroughs in preparing the needs assessment, the process and outcomes of this engagement are not reflected in the document, which is a consideration in judging the soundness of the DPD.

Finally, we do not consider the Council has involved all the relevant stakeholders in the preparation of this document, as required in paragraph 6 of the PPTS:

*'In assembling the evidence base necessary to support their planning approach, local planning authorities should:*

*a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)*

*b) co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development*

*plan working collaboratively with neighbouring local planning authorities.'*

As a community development and regional strategic organisation providing support to Gypsy and Traveller communities in London for more than 20 years, the London Gypsy and Traveller Unit should have been engaged in the production of the Needs Assessment and Sites and Policies DPD.

We would wish to arrange a meeting with the Council's Housing and Planning departments before the finalisation of the publication DPD in order to discuss these matters in more detail. Please can you suggest suitable dates for this meeting.