

**Merton Sites and Policies Plan Examination in Public
Written submission on Matter 3**

**London Gypsy and Traveller Unit
12 December 2013**

1. In response to the Inspector's questions regarding the policy approach to Gypsy and Traveller provision, we wish to confirm that our position remains the same as stated in our previous consultation submissions. We are not satisfied that the accommodation needs assessment conducted by the Council provides robust evidence to support the lack of site allocations for Gypsy and Traveller pitch provision. In addition, we are not convinced that the site assessments presented in document SP5.60 have taken into consideration a variety of solutions that would enable their allocation for Gypsy and Traveller provision.
2. We do not want to reiterate the arguments presented in our previous responses, but we would wish to add further supporting comments.
3. First of all, regarding the accommodation needs assessment carried out as part of the event organised in Merton in October 2011 we consider that the survey questionnaire is not in general keeping with the DCLG 2007 Gypsy and Traveller Accommodation Needs Assessment Guidance. While we understand that this guidance is not meant to be prescriptive and that the Council has adapted the survey to the circumstances of the engagement event, we consider that a list of key issues and questions included in the Annex of the Guidance would have been essential to the robustness of the study. We wish to point out to the questions under sections 2. Intentions and preferences and 3. Specific accommodation circumstances.
4. The direction of this kind of questions is more focused on specific individual circumstances and therefore more conducive to a clear conclusion. Our main concern with the Merton accommodation needs assessment is that it bases the final conclusion of what the overall need is on responses to only one question, regarding the reasons for not living on a site.
5. Secondly, we are concerned by the lack of a robust assessment of the needs of current residents of the Brickfield Road site. The fact that only one resident has taken part in the 2011 engagement event and that none of the residents agreed to complete a questionnaire during the December 2012 visits, indicates a lack of good relationships between them and the Council and Merton Priory Homes.
6. In a recent visit to the Brickfield Road site, we discussed with one of the residents about the need for additional pitches and other accommodation issues on the site. We were struck by the poor maintenance state of the site, especially by issues that are under the responsibility of Merton Priory Homes to address, such as collecting the litter on the site. Billy Penfold showed us some of the problems on his pitch and on neighbouring pitches, in particular the flawed design of the amenity block which does not allow water drainage,

malfunctioning utilities, unfinished work on paving and gates and gave us many examples of poor service from the site management officers. Overall, we understand why the site would not be an attractive accommodation option.

7. We also had phone conversations with another resident of the site, Nobby Penfold. As former chair of the Gypsy Council, he asserted his knowledge of the accommodation needs of Gypsies and Travellers in South London and the wider region and emphasised the need for additional pitches in Merton. He explained there is a need for new pitches in the next 5 years, as a large number of new family formations are expected.
8. Therefore our view remains that in order to meet the requirements of the Planning Policy for Traveller Sites, the Sites and Policies Plan should seek to meet the need for 4-16 pitches by 2017 identified in the 2008 London Gypsy and Traveller Accommodation Needs Assessment. We do not consider the findings of this study outdated, since the needs identified have not been met. We also wish to note that the Council has included other studies dating from 2008 in the supporting evidence base, such as the Merton Infrastructure Needs Assessment (2008) and the Strategic Flood Risk Assessment (2008/2009). A further review of the accommodation needs of Gypsies and Travellers in the Borough after 2017 should be undertaken in conjunction with the community and support organisations.
9. In addition, we wish to make a number of comments on document SP5.60 in the Examination Library, the Merton site assessment for Gypsies and Travellers 2013.
10. Regarding the criteria used in the site assessment, we would disagree with a minimum pitch size of 500 sq m. This is not prescribed in the 2008 DCLG Designing Gypsy and Traveller Sites guidance, and it is very large compared to pitch sizes on Merton's own site and other sites across London. We suggest that the optimal pitch size should be around 250 sqm. Considering this, a number of the small sites (0.1 ha and above) presented in the assessment paper should be reviewed, as they would be able to accommodate at least 2 residential pitches.
11. Given that Gypsy and Traveller provision is a strategic priority, we would suggest that the Council should carry out negotiations with land owners to seek possible provision on private sites. We wish to give the example of Camden Council, who is currently having discussions with private land owners in order to secure the required Gypsy and Traveller provision in the Borough. We believe that a number of sites have been excluded although the identified constraints could be mitigated, as they would in order to provide other types of development. Some suggestions are detailed below:
 - Leyton Road Centre – although the site is not available before 2019, it could still be included as a possible location for years 6-10 of the plan period. The fact that it would need to be redeveloped in order to provide pitches is not a serious constraint in our view.

- Worsfold House/ Chapel Orchard – the site could be considered for pitch provision after 2018. The assessment states that it would be able to accommodate such provision. Given the large size of the site, we would suggest that a mixed residential scheme could also incorporate pitch provision in order to balance the cost of development.
- Chaucer Centre – inclusion in a mixed residential scheme could mitigate the viability issue.
- Kenley Road Car Park – the Site and Policies Plan document refers to discussions between the Council and TfL in order to secure access to the site after 2018, therefore a CPO would not be necessary.
- 26 Bushey Road and 191-193 Western Road– the issues of surface water flooding and contamination would need to be mitigated anyway, if the sites are allocated for residential use.

12. We wish to stress the importance of indicating locations for Gypsy and Traveller pitch provision at this stage, as many of the sites included in the Plan are not available now and are proposed for a variety of uses after 2018-2019. If the accommodation needs assessment review carried out after the first five years of the plan will identify further need for Gypsy and Traveller pitches, the lack of possible site locations would adversely affect their delivery.

13. The change being sought is to delete paragraphs 2.7 and 2.9 of the position statement and to insert new paragraphs to read as follows:

2.7 However, the research found it difficult to engage with the existing residents at the Brickfield Road site. The assessment of need has been complicated by a low level of satisfaction with the management and maintenance of the site. Recent discussions with the site residents shows the need for new pitches in the next 5 years as a large number of new family formations are expected. The Council sees merit in undertaking a further review of the accommodation needs of Gypsies and Travellers in the Borough in conjunction with the community and support organisations.

2.9 The new accommodation needs assessment will identify a target for additional Gypsy and Traveller pitches for 2019-23 and 2024 - 28. The current target for the 1st five years from 2013-2018 is 4 - 16 pitches as identified in the 2008 Needs Assessment.

14. Finally, we would like to request the Inspector to make a site visit to the Brickfield Road Gypsy and Traveller site as part of this Examination.