

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3375

### Title: London Gypsy and Traveller Accommodation Needs Assessment

#### Executive Summary:

The London Gypsy and Traveller Accommodation Needs Assessment (GTANA) assesses accommodation needs for Gypsy and Traveller, Travelling Showpeople and Roma households over a 10-year period from a baseline year of 2022-23 to 2031-32. It reflects a commitment in the London Plan 2021 to carrying out a London-wide GTANA. The GTANA assesses the need for Gypsy and Traveller pitches, Travelling Showpeople plots and bricks and mortar housing for Roma and Gypsy and Traveller households on a borough, sub-regional and London-wide basis.

The GTANA provides evidence that the GLA and local authorities can use in developing housing and planning policies, including informing policy in the next London Plan, making it more likely that these accommodation needs will be addressed.

#### Decision:

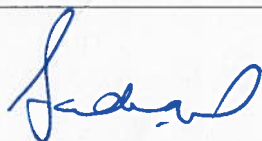
That the Mayor approves publication of the London Gypsy and Traveller Accommodation Needs Assessment and associated material (including the policy maker and non-technical summaries and Equalities Impact Assessment).

#### Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

25/4/22

## **PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. The Mayor made a commitment in the London Plan 2021 to initiate and lead a London-wide Gypsy and Traveller accommodation needs assessment. In December 2021 the Mayor approved expenditure of up to £200,000 across financial years 2021-22 and 2022-23 to procure a contractor to carry out a London-wide Gypsy and Traveller Accommodation Needs Assessment (Mayoral Decision (MD) 2908). This was in recognition of the continuing shortage of and unmet need for Gypsy and Traveller pitches in London.
- 1.2. Following a tender exercise, a contractor was appointed and work commenced in March 2022. The assessment is now complete. The previous MD (MD2908) commits to publishing the results on the GLA website.
- 1.3. The GTANA assesses accommodation needs for Gypsies and Travellers, Travelling Showpeople and Roma from 2022-23 to 2031-32 on a borough, sub-regional and London wide basis. This includes need for Gypsy and Traveller pitches, Travelling Showpeople plots and bricks and mortar housing for Roma and Gypsy and Traveller households. It draws on surveys carried out with households living on sites and yards and in bricks and mortar housing. The baseline year of 2022-23 reflects when the surveys were carried out.
- 1.4. The GTANA also outlines matters for the GLA, boroughs and others who work with Gypsies and Travellers, Travelling Showpeople and Roma communities to consider when planning or seeking to meet accommodation needs.
- 1.5. The work was guided by a Steering Group which included representatives from Gypsy and Traveller, Roma and Travelling Showpeople organisations and from boroughs. This met on a periodic basis, giving advice and reviewing drafts of the report and other material. Boroughs were also kept informed of progress with the GTANA and given the opportunity to comment on draft needs figures.
- 1.6. The GTANA provides important evidence for the GLA and local authorities to use in developing housing and planning policies.

#### **2. Objectives and expected outcomes**

- 2.1. Key objectives of the GTANA are to:
  - provide a comprehensive assessment of need of London's Gypsy and Traveller and Travelling Showpeople communities at the local (32 London boroughs, the City of London, and Old Oak and Park Royal Development Corporation (OPDC)),<sup>1</sup> sub-regional and regional level, so such assessed need can be addressed, and further provision made
  - provide robust evidence to support the implementation of London Plan 2021 Policy H14 on Gypsy and Traveller accommodation and inform associated local and strategic policy development.
- 2.2. Expected outcomes as set out in MD2908 are to:
  - provide an evidence base for Local Plan development and cross borough Planning Frameworks, informing local needs assessments by providing up-to-date evidence

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<sup>1</sup> London Legacy Development Corporation (LLDC) ceased to be a Local Planning Authority on 1 December 2024. Accommodation needs identified before this date for this area have reverted back to the boroughs formerly covered by LLDC.

- support actions, including by local authorities and landowners, that help to meet the demonstrable need for an increased number of pitches across London
  - provide up-to-date figures to ensure that the housing needs of Gypsies and Travellers are recognised as part of the Mayor's London Housing Strategy
  - help address the inequalities experienced by Gypsies and Travellers in London by addressing this need and promoting an integrated inclusive approach to housing within London.
- 2.3. As well as informing the implementation and monitoring and review of current London Plan Policy H14 on Gypsy and Traveller accommodation, an expected outcome is to inform the development of a future London Plan.
- 2.4. It is also expected that the data will be used by boroughs or other housing providers to inform applications for grant funding for development or improvement of sites for Gypsies and Travellers (as indicated in the London Plan Panel Report 2019).

### **3. Equality comments**

- 3.1. The Mayor and the GLA are subject to the public sector equality duty ("the Duty"), as set out in Section 149 of the Equality Act 2010 ("EA 2010"). The Duty requires the Mayor and the GLA when exercising their functions to have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation
  - advance equality of opportunity
  - foster good relations between people who have a protected characteristic and those who do not.
- 3.2. The relevant protected characteristics are race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment.
- 3.3. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to tackle prejudice, and promote understanding. Compliance with this Duty may involve treating some persons more favourably than others but this does not permit conduct that would otherwise be prohibited under the EA 2010.
- 3.4. By identifying the accommodation needs of Gypsy, Roma, Traveller and Travelling Showpeople (GRTTS) groups, the GTANA supports public bodies in fulfilling their obligations under PSED. It helps local authorities eliminate discrimination, promote equality of opportunity, and foster good relations between different community groups, aligning policy decisions with statutory equality requirements.
- 3.5. The GTANA will contribute towards delivery of the Mayor's Equality, Diversity and Inclusion strategy Objective 2, 'To increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing'. An Equalities Impact Assessment is to be published alongside the GTANA.
- 3.6. The Equalities Impact Assessment (EqIA) of the GTANA finds an overall positive benefit. By providing an up-to-date assessment of accommodation need, the GTANA will enable local authorities to accurately plan to provide accommodation as London Plan Policy H14, national planning policy and

s124 of the Housing and Planning Act 2016 require. This will increase the likelihood of GRTTS communities accessing decent, culturally appropriate accommodation. Meeting these groups' accommodation needs will lead to less overcrowding and fewer unauthorised encampments.

- 3.7. The EqIA records actions taken to mitigate potential negative impacts and maximise positive impacts. GRTTS groups helped in this regard. Representative organisations sat on the GTANA Steering Group, attended Steering Group meetings, advised on methodology and survey wording and reviewed the draft GTANA report and other material. The Roma Support Group translated the survey into the main languages spoken by the Roma community in London. GRTTS groups also assisted households to complete surveys. This helped to maximise the GTANA survey response rates.
- 3.8. An integral part of the project specification is that the London GTANA should reflect accommodation needs arising from Gypsy and Traveller households living in bricks and mortar homes who need to live on a pitch. Initially, the concept of 'psychological aversion' was used to assess this element of accommodation need. In response to Steering Group and some borough concerns and following a recommendation by the Steering Group, the methodology was revised to use 'cultural preference' rather than 'psychological aversion' to assess the needs of this group. An approach based on 'cultural preference', avoids any stigma associated with psychological aversion and recognises the need for culturally appropriate accommodation that enables Gypsies and Travellers to continue to live according to their traditional way of life.

#### 4. Other considerations

- 4.1. Reflecting the Mayor's commitment to conducting an inclusive assessment of need, the GTANA assesses accommodation needs for households that meet both the national Planning Policy for Traveller sites ("PPTS") definition which was updated in December 2024 and the wider definition of Gypsies and Travellers previously proposed by the Mayor in his Intend to Publish London Plan (MD2908 paragraph 1.13).<sup>2</sup> These are now considered equivalent for practical purposes. This ensures that the needs of all Gypsies and Travellers are accounted for, regardless of their travelling status.
- 4.2. Key risks and issues

Risk	Mitigation	Current probability (1=low, 4=high)	Current Impact (1=low, 4=high)	RAG
Boroughs or GRTTS groups may challenge the GTANA findings.	The GTANA determines accommodation needs based on a robust methodology and drawing on established guidance. It draws on analysis of household survey responses and published data, including Census data and borough information.	2	2	Amber
Boroughs and GRTTS groups may challenge the GTANA methodology, in particular the London-wide approach to assessing the needs of Gypsy and	The GTANA takes a London wide approach to assessing the accommodation needs of Gypsy and Travellers who	2	1	Amber

<sup>2</sup> The wider definition in the Intend to Publish London Plan was not carried forward in the London Plan 2021 due to a direction from the then Secretary of State requiring the Mayor to delete it.

<p>Traveller households who live in bricks and mortar housing.</p> <p>To assess these needs, the GTANA draws on survey responses from across London, rather than from within individual boroughs. The GTANA household survey found that 19 per cent of households living in bricks and mortar housing need to move and have a cultural preference to live on a site. The GTANA reapportions this percentage to the boroughs.</p>	<p>live in bricks and mortar housing due to the small populations and/or a low survey response rate in some boroughs. Previous surveys by boroughs of this group tend to be lacking or based on a very small sample. By drawing on responses London wide the GTANA is able to draw conclusions that are considered representative of the population as a whole.</p>			
<p>The GTANA findings and purpose may be misunderstood.</p>	<p>Alongside the GTANA a policy maker summary and non-technical summary are to be published. Following publication, dissemination of the findings will include presentations to boroughs and groups.</p>	3	2	Amber
<p>Revised planning definition of Gypsy and Traveller, Planning Policy for Traveller Sites, MHCLG 2024.</p> <p>The GTANA assesses need for pitches based on households that meet the PPTS 2024 and the Intend to Publish London Plan definitions. While the two definitions are not identical, they are considered close enough to align for practical purposes, the revised PPTS definition representing an inclusive approach, unlike earlier iterations of PPTS.</p> <p>It is possible the courts may take a different view on the interpretation of PPTS 2024.</p> <p>Groups representing Gypsies and Travellers have welcomed the revised PPTS definition.</p>	<p>It is considered unlikely there would be a Court ruling relating to the new definition and how it should be interpreted (at least for some time).</p>	1	4	Amber

#### Links to Mayoral strategies and priorities

- 4.3. This work responds to a commitment made in the Mayor's London Plan 2021. It also supports the Mayor's Equality, Diversity and Inclusion Strategy.

- 4.4. It supports the objective set out in the Mayor's London Housing Strategy to ensure that the housing needs of Gypsies and Travellers are met (under London Housing Strategy Policy 5.2: Meeting London's diverse housing needs).

#### Consultations and impact assessments

- 4.5. The GTANA methodology entailed conducting face to face surveys with households living on sites and yards and online surveys with Gypsy and Traveller and Roma households living in bricks and mortar housing and wider stakeholders. Meetings were held with boroughs to discuss the GTANA methodology and their draft need figures, drafts of which were shared beforehand.
- 4.6. The GTANA project Steering Group included representatives of Gypsy and Traveller, Roma and Travelling Showpeople organisations and of London boroughs. The Steering Group met several times, providing advice and reviewing material, including drafts of the GTANA report and EqIA. Representative organisations assisted with carrying out household surveys.
- 4.7. An EqIA has been undertaken, which identifies an overall positive benefit of doing the GTANA. By determining the accommodation needs of protected groups, local authorities and other bodies tasked with meeting needs or planning new or improved provision will be able to better do so on an informed basis.

#### Conflicts of interest

- 4.8. There are no conflicts of interest to declare from those involved in the drafting or clearance of this decision form.

### **5. Financial comments**

- 5.1. There are no direct financial implications for the GLA arising from this proposal. The GTANA report and associated material will be published on the GLA website. Commissioning the GTANA, including expenditure up to £200,000, was previously approved under MD2908.

### **6. Legal comments**

- 6.1. Section 30 of the Greater London Authority Act 1999 (as amended) ("GLA Act") gives the Mayor a general power to do anything which he considers will further one or more of the principal purposes of the GLA including:
- promoting economic development and wealth creation in Greater London
  - promoting social development in Greater London
  - promoting the improvement of the environment in Greater London.
- 6.2. In formulating the proposals in respect of which a decision is sought, officers have complied with the Authority's related statutory duties to:
- pay due regard to the principle that there should be equality of opportunity for all people section 33 of the GLA Act)
  - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom (sections 30(3-5) of the GLA Act)
  - consult with appropriate bodies as appropriate (section 32 of the GLA Act).

- 6.3. Section 334 of the GLA Act requires the Mayor to prepare and publish a spatial development strategy (known as the London Plan) and section 339 requires the Mayor to keep the London Plan under review, especially matters which may be expected to affect the development of Greater London or the planning of its development. The Mayor also has housing and regeneration functions contained in Part 7A of the GLA Act and a subsidiary power pursuant to section 34 to do anything which is calculated to facilitate, or is conducive or incidental to the exercise of any of the statutory functions of the Authority. In this case, the decision to publish the GTANA which will form part of the evidence needed by The GLA and local authorities when developing housing and planning policies, may reasonably be regarded as facilitating, being conducive or incidental to, the exercise of the Mayor's power under Part 7A, section 30, 334 and 339 of the GLA Act.
- 6.4. In considering the proposals in respect of which a decision is sought, the Mayor must have due regard to the Duty as addressed in section 3 of this MD.

## **7. Planned delivery approach and next steps**

- 7.1. Following publication, it is envisaged that dissemination would include a presentation to boroughs and further presentations when opportunities arise, and updates through forums such as the Association of London Borough Planning Officers (ALBPO). These will aim at raising awareness and understanding and supporting practical implementation of the findings.

<b>Activity</b>	<b>Timeline</b>
GTANA report and appendices published	November 2025
EqlA published	November 2025
GTANA policy maker and non-technical summaries published	November 2025

### **Appendices and supporting papers:**

- Appendix 1 - London GTANA report and appendices  
Appendix 2 - London GTANA Equalities Impact Assessment  
Appendix 3 - London GTANA policy maker summary  
Appendix 4 - London GTANA non-technical summary

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

### Part 1 - Deferral

#### Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To ensure the MD is not published prior to publishing the report. It can happen on the same date or asap after.

Until what date: November 2025 (after report publication)

### Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

#### Is there a part 2 form – NO

### ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

#### Drafting officer:

Kate Gordon has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Sponsoring Director:

Philip Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

#### Mayoral Adviser:

Jules Pipe and Tom Copley have been consulted about the proposal and agrees the recommendations.

✓

#### Advice:

The Finance and Legal teams have commented on this proposal.

✓

#### Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 30 June 2025.

### CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

**Date:** 12 November 2025

**Signature:**



### CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

**Date:** 12 November 2025

**Signature:**

