

1 Policy H1 is entitled 'Increasing housing supply'. The counterpart policy H16 is simply entitled 'Gypsy & Traveller accommodation'. The imperative to **increase** the housing supply does not have an equivalent requirement to **increase** the availability of Gypsy & Traveller pitches. All Londoners should be treated equally and without discrimination; therefore the titles should, at least, use the same wording and have the same emphases.

2. Policy H1A is firmer than the equivalent Gypsy & Traveller Policy, H16A, in a number of ways:

a] In H1A the words used are 'Boroughs **must** include these targets in their development plans'. But in H16A the words used are 'Boroughs **should** plan to meet the identified need'. Clearly the same wording should apply to the Gypsy & Traveller community as to everyone else. Therefore, I submit that in both H1A & H16A the word '**must**' should be used. Further, Boroughs must be required to include targets for Gypsy & Traveller net site completions in their developments plans in the same way as they are required to include targets for net housing completions.

b] H1A refers to Table 4.1 which sets the 10 year targets for net housing completions. The only equivalent table for net Gypsy & Traveller pitch requirements come from the 2008 Fordham Needs Analysis document. I suggested that 'the midpoint figure of need in Table 3 of the GLA Gypsy & Traveller Accommodation Topic Paper 2017' referred to para C2 of Policy H16 should be included in the London Plan as being the equivalent for the Gypsy & Traveller community as Table 4.1 (referred to in Para A of Policy H1) is for everyone else.

c] Table 4.1 exists because 'The Mayor has carried out a recent London-wide SHMA and SHLAA' (para 4.1.1 refers) and provided 10 year targets for housing developments. No such recent assessment has been carried out for Gypsy & Traveller pitch requirements. The Fordham figures are 10 years out of date but if 'the midpoint figure of need in Table 3 of the GLA Gypsy & Traveller Accommodation Topic Paper 2017' were included (as a starting point) the Gypsy & Traveller community would be being treated more equally to everyone else than the current draft London Plan requires.

d] As it was the **Mayor** that carried out the SHMA and the SHLAA, **Boroughs** should not be expected to carry out a new (or revised) GTANA's and to identify land for new sites (although there is no mention of this latter point in the London Plan as there should be). The midpoint figure (referred to above) should be included in the London Plan as an initial starting point and, within one year of the commencement of the plan, the Mayor should commission a new London-wide Gypsy & Traveller

Accommodation Needs Assessment, on the same basis and the SHMA and the SHLAA, so that the revised figures, coming out of the new GTANA, can be substituted into the London Plan.

e] The suggestions for changes in [a] – [d] above are essential if Gypsies & Travellers are to be treated equally with all other Londoners and not discriminated against.

3. Policy H1B & C are a very specific set of requirements placed on Boroughs regarding the delivery of new housing but there is no equivalent set of requirements for Gypsy & Traveller pitch provision. The same requirements should be included for Gypsy & Traveller pitch provision as for the new housing provisions for all other Londoners.

4. Policy H1D requires that Boroughs should publish and annually update housing trajectories based on the SHMA but there is no such requirement to publish and annually update the Gypsy & Traveller pitch trajectories. The same requirements should be included for Gypsy & Traveller pitch provision as for the new housing provisions for all other Londoners and Boroughs should publish and annually update Gypsy & Traveller pitch trajectories based on, initially, the midpoint of the Fordham GTANA and thereafter based on the outcome of the suggested new London-wide GTANA.

5. Para 4.1.2 considers London as a single housing market area but Gypsy & Traveller matters are not included. It is submitted that the logical reasons that are stated as to why London should be treated as a single housing market apply equally to the Gypsy & Traveller community. The data collected, the requirements placed on Boroughs, the methods of monitoring progress against targets should be identical for the Gypsy & Traveller community pitch completions as for all other housing completions. Indeed, it would be preferable if London was considered as a single **accommodation** market.

6. Para 4.1.3 refers to the necessity approximately to double the house completion rates so that targets can be met. There is no such commitment to the requirement for urgent action to address the need for Gypsy & Traveller pitches. Why is there a difference? The need for Gypsy & Traveller pitch provision is equally important and the policies should reflect the equality of treatment for all races and all sections of society. It is suggested that there should be an equivalent policy based on the need to increase substantially (more than double?) the Gypsy & Traveller pitch completions.

7. Paras 4.1.4, 4.1.5, 4.1.6, 4.1.7 & 4.1.8 all contains information pertinent to the 'housing' market but there are no equivalent policies for Gypsy & Traveller pitches. Again, why is there a difference? There should be equal treatment for all Londoners.

8. Policy H16C (2) refers to the Table 3 of GLA Gypsy & Traveller Accommodation Topic Paper 2017, it is suggested that the figures in that table should be incorporated into the London Plan. Boroughs should be required to work to those figures in the first instance and whilst a new GTAA is carried out on a London-wide basis by the Mayor. See 2[d] above.

9. There should be a policy aimed at ensuring that Boroughs do not delay delivery of pitches for Gypsies & Travellers against the existing targets whilst a new GTAA is carried out. Boroughs should, initially, be required to plan for Gypsy & Traveller site provision based on the midpoint figures referred to above whilst a new GTANA is carried out. This is important because, unless this is done, there will be further delay built into the system that will further exacerbate the current chronic shortfall in pitch provision.

10. There should be a new policy requiring Boroughs to publish their trajectories for pitch delivery on an annual basis in the same way as they are required to publish their trajectories annually for housing completions.

11. There should be a new policy that ensures that 10 year pitch requirements are met.

12. Policy H16 E requires a time frame to be added – within one year.

13. Para 4.16.4 line 3 refers to ‘housing’ – this should be ‘accommodation’.

14. Para 4.16.10 refers to new pitches and design without referring to the DCLG Design Guide – it is acknowledged that this document is now some years old but it is the best available and actually quite good! It should be referred to in this paragraph.

15. The new definition of Gypsy & Traveller is welcomed but the definition makes no reference to boat dwellers and others. Also, the definition tries to define race in terms of lifestyle rather than accepting ethnicity as the definition of race. Further, the new definition will be of little value if there is in-built discrimination within the London Plan in the treatment of Gypsies & Travellers with pitch provision as compared to all other Londoners and their accommodation provision.

16. Policy H1, B 2 f) refers to Policies E4, E6 & E7. These policies should be checked to ensure that they do not discriminate against Gypsies & Travellers and make future site provision more difficult.

17. Policy H4 ‘Meanwhile Use’ is welcomed. This policy should make it clear that ‘meanwhile use’ would be ideal as a temporary stopping place or area of temporary acceptance for the Gypsy & Traveller communities.

18. Policy H16 F needs to read in conjunction with para 4.16.9. Where it is necessary to relocate existing pitches – and this should be only under exceptional circumstances – it should be a requirement that the new pitches are made available prior to the existing pitches being removed from use. Further, there should be an understanding that the new pitches should, at least, meet the specifications in the old DCLG Site Design Guide. If it is unacceptable to use the DCLG Site Design Guide, the London Plan should include a site design guide.