Planning for the accommodation needs of Gypsies and Travellers in London
The London Gypsy and Traveller Unit is both a community development and a regional strategic organisation. We seek to support Travellers and Gypsies living in London: to have greater control over their lives; to influence decisions affecting their lives; to improve their quality of life and the opportunities available to them; and to challenge the discrimination they routinely experience. We work with Gypsies and Travellers to use this detailed local and regional experience to contribute to national policy.

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Planning policy is important for Gypsies and Travellers, as it is the mechanism by which land is allocated for culturally suitable accommodation. A historical lack of site provision, insecurity, isolation and discrimination are already taking a great toll on family life, health and well-being and opportunities for education and employment. Without adequate accommodation options to support the culture and tradition of Gypsy and Traveller communities, inequalities and exclusion will continue to rise.

A brief history of planning for Gypsy and Traveller sites

In 1968 the Caravan Sites Act placed a duty on local authorities to build council sites and while this was not fully enforced, it brought an increase in provision across the country. The duty was repealed in 1994 with the introduction of the Criminal Justice and Public Order Act. In London over 550 pitches were delivered on local authority sites between 1968 and 1997 but around 85 were lost in the early 2000s mainly due to redevelopment and regeneration.

The Housing Act 2004 required local authorities to assess the accommodation needs of Gypsies and Travellers and meet this through local development plans. In London this led to the GLA commissioning a London-wide Gypsy and Traveller Accommodation Needs Assessment to inform the London Plan. While initially the draft replacement London Plan of 2009 set targets for 800 new pitches to be provided across the London Boroughs, these were scrapped in later alterations following the Localism direction set by central government. Since then, there has been a net delivery of under 10 pitches.

This report evaluates a 4 year project (2012-2016), supporting the engagement of Gypsy and Traveller communities in planning policy across London with the focus on the need for culturally suitable accommodation.

This period coincided with the Planning Policy for Traveller Sites (PPTS) introduced by central Government in 2012 as part of the national planning framework. The PPTS required Local Authorities to engage with Traveller communities to assess their accommodation needs and identify land for Gypsy and Traveller sites.

This report aims to:

• provide an unique body of evidence on the barriers to Gypsy and Traveller site delivery in London
• challenge the assumption that local authorities are adequately addressing Gypsy and Traveller provision in their local plans in line with national policy
• draw on our experiences of engaging with plan-making processes to highlight examples of best practice
• make recommendations to decision and policy makers for more inclusive and sustainable policy approaches

Through this report we’re seeking to reach planning and housing officers and elected members at all levels of government, as well as voluntary and community sector organisations working to support Gypsy and Traveller communities and equality and inclusion more generally.
Key findings

1 Planning Policy for Traveller Sites introduced important new requirements which should have seen a step change in meeting Travellers’ accommodation needs.

However in London the policy was effectively thwarted by Local Authorities who with few exceptions did not undertake collaborative work with Gypsy and Traveller organisations or with neighbouring Local Authorities, produced needs assessments that underestimated actual need and did not identify and allocate land for new Traveller sites.

2 Separate Gypsy and Traveller Local Plans are an ineffective mechanism that frustrate and delay the bringing forward of Travellers sites.

The Planning Inspectorate need to be made aware of how these separate Plans are a stalling device which allows Local Authorities not to implement Planning Inspector recommendations.

3 Responding to consultations can have a limited impact and Gypsies and Travellers need to set their own agenda. Planning not only impacts on the accommodation needs of Travellers, but also on employment, education and health and we will explore a more integrated approach to how planning policy in London can truly meet all the needs of Gypsies and Travellers.

This has been done through a manifesto for the 2016 election of Mayor and by working with other community groups on an alternative London Plan.
The Gypsy and Traveller Accommodation Needs Assessments, the main source of evidence for Local Plans, often significantly underestimate actual need due to a flawed methodology.

Good practice examples, such as the Hackney needs assessment that was prepared with LGTU input, should be followed. This involved members of the Traveller community in shaping significantly the approach to interviews, the questionnaire, outreach and inclusion of housed Gypsies and Travellers.

Local Travellers groups having a direct voice in Local Plan examinations was hugely important, bringing real life information to the attention of the Planning Inspector.

Local Traveller groups working together with support organisations like LGTU and with Universities bring to planning discussions a combination of technical knowledge with grass-roots experience which was found to be highly effective.

The case studies show the value of Travellers forming alliances with other community organisations. This challenges the assumption held by public bodies that, for local communities, Travellers are not welcome.

As part of the Boroughs approach to Community Involvement, there has to be specific and targeted engagement with Gypsies and Travellers to ensure their inclusion.

Gypsies and Travellers need to be pro-active in the identification of sites, and not wait for sites to be brought forward by the Local Authority.
Recommendations for policy makers

1. Take forward the London Assembly Housing Committee recommendations with the Mayor. The Mayor of London should ensure the evidence base for the London Plan is based on an inclusive assessment of the accommodation needs of all Gypsies and Travellers, set pitch targets in the new London Plan, make GLA land available for Gypsy and Traveller sites and include Traveller site provision in the London Housing Strategy.

2. The Mayor’s Traveller Pitch Fund to be much better publicised and to make an open call for applications from small housing providers working in partnership with Traveller organisations. Since many Traveller sites are in a poor state of repair, the Mayor should use this funding to encourage a planned programme of maintenance and improvement work of Traveller sites by Borough and by sub region.

3. In light of the success of Leeds Council’s negotiated sites, and the London Assembly Housing Committee interest in a pilot scheme for London that makes land available for short term Gypsy and Traveller sites, we need to consider in which Boroughs the "negotiated stopping places" could work and to bring forward a pilot.
Priorities for LGTU

• Seek to influence public land disposal by joining with those who want to see the London Land Commission make land available to smaller scale developers, including community led not for profit housing.

• To gather evidence on the approach to Gypsy and Traveller site management across the London boroughs and compare this with the approach to general council housing stock. To assess the impacts of this different treatment on Traveller communities and challenge local authorities who are not meeting the Public Sector Equality Duty. To make recommendations for more integrated and inclusive management mechanisms and provide a toolkit for Gypsies and Travellers to understand their rights as tenants.

• The 6 case studies of Examinations in Public should be made available as a series of factsheets, that can be shared with the Planning Inspectorate and planning practitioners.

• Research on how various alternative affordable and niche housing providers have succeeded to raise capital, achieve registration and find land. Develop a resource/toolkit for other community groups and Traveller support organisations.

• Research Housing Associations ethnic monitoring (whether Gypsies and Travellers are included as a category) and housing types (those most appropriate for Gypsies and Travellers have family housing, low rise, play space and other amenity space) and develop partnerships with BME Housing associations.

• Explore opportunities for setting up a London wide Gypsy and Traveller Housing Association to take the lead on issues facing housed Travellers, managing properties, delivering a Traveller site, building support networks with Local authorities, the GLA, other providers/RSLs, third sector organisations, develop apprenticeship schemes for young people.

• Explore community-led housing provision routes and the possibilities for members of the Gypsy and Traveller community to set up a local Community Land Trust and/or housing co-operative.
Section 1
Planning Policy

This section of the report presents evidence of how all the London Local Authorities addressed the requirements of the Planning Policy for Traveller Sites between March 2012 and November 2015 and offers 6 case studies where detailed work was undertaken up to and including Examinations in Public overseen by Planning Inspectors appointed by central Government.
The national policy context

In October 2014 the Department for Communities and Local Government launched a public consultation on proposed changes to the Planning Policy for Traveller Sites. The most important provision was to change the planning definition of Gypsies and Travellers to exclude those who have ceased to travel permanently.

The reaction of the Gypsy and Traveller community in London and across the country has been to strongly oppose this change in definition, highlighting the very likely negative impacts this would have on the majority of Gypsies and Travellers who have settled on sites and in housing due to decades of legislation and enforcement powers which have made travelling for work very difficult if not impossible.

In addition concerns were raised not only by the community and support organisations, but also the Equality and Human Rights Commission, local authorities, planning consultants and barristers that the new definition would discriminate against the most vulnerable members of the community, particularly women, children, older people, those who are disabled or suffer from long-term illness. Despite the strong opposition, the amended version of the Planning Policy for Traveller Sites was adopted in August 2015.

476 responses from Gypsies and Travellers and support organisations

At least 62% of responses opposed the new planning definition

In October 2015 the Housing and Planning Bill was introduced in Parliament, including a provision to remove from the Housing Act 2004 two sections which referred specifically to assessing the accommodation needs of Gypsies and Travellers. In the Committee stage evidence was submitted by a wide range of organisations and individuals arguing against the removal of the specific duty for local authorities, the housing definition of Gypsies and Travellers and the 2007 DCLG Guidance on conducting Gypsy and Traveller Accommodation Needs Assessments.

The concerns of the Gypsy and Traveller community regarding breaches to equality and human rights legislation and well as a negative impact on future provision of culturally suitable accommodation were supported in House of Commons debates by MPs and through further amendments proposed in the House of Lords. However, like most amendments made on other sections of the Bill, these have not been accepted by the Government. The Housing and Planning Act will come into force on July 12th 2016.
The national policy context

Implications of policy and legislation changes

The likely impacts of these two major policy and legislation changes are:

- general housing needs assessments (e.g. Strategic Housing Market Assessments) will not be able to pick the accommodation needs of small population groups such as Gypsies and Travellers living on sites and especially in housing due to their standardised methodology

- it is unclear which housing assessment studies will consider the needs of Gypsies and Travellers who do not meet the new planning definition and the new DCLG draft guidance on assessing the needs of caravan and houseboat dwellers does not adequately address this concern

- local authorities are very likely to accept there is no need for future site accommodation where GTANA reports conclude none of the households in the area meet the planning definition

- There will be less culturally suitable accommodation for Gypsies and Travellers in the future.

Case study

Two recent Gypsy and Traveller Accommodation Needs Assessments from London undertaken by the same consultancy after the new planning definition was adopted in August 2015 illustrate the immediate negative impacts of this change on the Gypsy and Traveller community, the dangers of a narrow interpretation of the new definition based solely on travelling for work and the lack of coordination with the general housing needs study. In both cases the future need of young people growing on the site has not been taken into account, although it is mentioned in the findings of the reports.

Old Oak and Park Royal Development Corporation (OPDC) - February 2016
This study found there is no need for additional pitches until 2031, based on interviews conducted at the Bashley Road Traveller site in Ealing (now included in the OPDC planning area). A previous GTANA from 2008 had found a need for up to 64 new pitches needed in Ealing between 2007-2017, none of which have been provided since. The OPDC SHMA does not mention the needs of Gypsies and Travellers who do not meet the planning definition.

Newham - February 2016
Similarly, the Newham GTANA resulted in a need of 0 pitches by 2032, despite there being a need for up to 19 pitches between 2007-2017 as previously identified. The Newham SHMA has not been published yet.
Between March 2012 and August 2015 we have undertaken monitoring of all London Boroughs to give a detailed understanding of how each Local Authority is approaching Gypsy and Traveller provision.

This is important because there is no monitoring by central Government. The GLA seeks to monitors the number of new pitches but there are flaws in the process as we found that refurbished pitches have been counted as if they were new pitches and even counted as new social housing provision.

For the Boroughs, annual monitoring reports are no longer compulsory and the level of detail they provide is very inconsistent.

Borough monitoring has involved reviewing planning documents to check if there was an accommodation needs assessment, a target for pitch provision and a supply of land to meet the need for pitches. The main findings are:

### Key findings

1. **Since 2012, less than one third of London Boroughs have completed a Gypsy and Traveller Accommodation Needs Assessment (GTANA) even though this is a requirement.**

   Where there has been a new assessment, the levels of need are significantly lower than the London wide GTANA conducted in 2008 (See Fig.1 and Fig.2).

   The main reasons are that the majority of needs assessments do not recognise the needs of housed Travellers and there are methodological weaknesses that we review later.

2. **Only half of those Boroughs that have adopted a Local Plan post March 2012 have set a pitch target. The main reason given is that they are waiting to undertake a new needs assessment.**

3. **A very small number of Boroughs (5 in total) have gone on to identify a supply of land in order to achieve the pitch target and in all but one case this has been through extensions to existing sites rather than new sites.**
Gypsy and Traveller Accommodation Needs

Fig. 1. Number of new pitches required by 2017 identified in the 2008 London GTANA

Fig. 2. Number of new pitches identified in local GTANAs since 2012
These maps show the number of new pitches needed in each Borough as identified in the 2008 London wide GTANA (fig.1) and local GTANAs conducted after March 2012 (fig.2). While it is difficult to compare the two sets of data and estimate the overall decrease in identified need because the time scales of these studies are different, the following observations can be made:

- Only two local GTANAs resulted in higher figures than the 2008 study, providing a more realistic estimation of need and factoring in unmet need since 2008.
- The majority of local authorities have not conducted an updated GTANA to support emerging local plans, which in many cases has delayed producing policies for Gypsy and Traveller accommodation.

We found the following problems with the methodology:

- It is largely desk top based and does not give enough attention to the local context.
- Interviewers tend to show up on Traveller sites unannounced or to have simply sent a letter inviting people to phone if they wish to be interviewed.
- From our experience and observations, these approaches usually result in a very low response rate.

**Recommendations**

1. Needs assessments must be done in collaboration with a local Traveller group or support organisation.

2. There should be a visit in advance of the site interviews to explain why the study is so important and the sorts of questions that will be asked.

3. Much more use can be made of local Travellers to provide contact with Travellers living in bricks and mortar.

**GTANA methodology**

The methodology used by the Local Authorities and their consultants often has weak connections with the Traveller population. Not enough people are found for interview due to waiting lists being poorly maintained, relying on Travellers responding to their adverts and generally not establishing trust with the community. This is despite guidance from central Government.

The draft guidance supporting the Housing and Planning Act (due to be published on 12 July 2016) emphasises the need to think carefully about how to engage Travellers, working with Traveller organisations from the earliest stages and suggests ways of including Travellers living in bricks and mortar.

The Planning Policy for Traveller Sites (2015) requires Local Plans to be based on robust evidence of need, assessed with the participation of the Gypsy and Traveller community and their support organisations.

See Appendix 3 for Hackney GTANA good practice
Introduction to the case studies

As a result of the monitoring work we attempted to be involved in planning policy consultations across the London Boroughs. This map shows where we submitted representations at different stages of public consultation.

The choice of where to concentrate most effort was partly dictated by the Local Plan timetables. Merton and Greenwich are examples where there was no prior contact with local Travellers, in Lewisham LGTU was actively supporting a Travellers organisation that had its own community development worker, Hackney is where LGTU is based and where Travellers have received sustained community development support from LGTU staff. In the cross Borough London Legacy Development Corporation (LLDC), Traveller groups came together from Tower Hamlets, Newham and Hackney.

Key findings

- Engaging with the plan making process and supporting community members to be involved is very resource intensive. The preparation of a planning policy document over a 2 year period includes several rounds of consultations, and the examination in public (EiP) at the end of the process meant responding to the calls of the Planning Inspector for further evidence.

- The fact that local authorities and planning inspectors argued the 2008 London GTANA was out of date and new studies had to be commissioned resulted in unwarranted delays in taking the necessary steps to meet existing need.

- In most cases local authorities were successful in persuading planning inspectors that a separate Gypsy and Traveller Local Plans will be produced to address the lack of Traveller site provision policies which would have made local plans unsound. In our view this separate route is not in line with Public Sector Equality Duties, marginalises site provision and results in significant delays, as there is no sanction for not having adequate policies in place.
The only Travellers site in Lewisham had been lost in 2009. The issue was whether the Council would identify a replacement site through the Local Plan.

Prior to the timeframe of our project, the Council had in 2011 adopted a document called the Core Strategy without including a replacement site. It deferred the task to the Site Allocations Local Plan. When this came forward in 2012-13 a replacement site was identified but then withdrawn following consultation.

Lewisham Council persuaded the Planning Inspector at the examination that the most appropriate response was to give closer attention to the site search through a separate Gypsy and Traveller Local Plan. Both LGTU and Lewisham Travellers Forum had concerns as to how long it would take the Council to complete this separate Plan and asked that the timetable be shortened by one year.

The Planning Inspector agreed, which felt like a partial success, but afterwards the preparation of the Gypsy and Traveller Local Plan stalled to such an extent that by September 2015 it had not achieved any of its stages.

The Gypsy and Traveller Local Plan was the only planning document scheduled for 2013-15 which was not prepared and examined. This raises strong concerns about the viability and effectiveness of separate plans for Travellers. There is also the need for a mechanism to challenge non-implementation of Planning Inspector recommendations.

There is one Local Authority site in Greenwich, at Thistlebrook, which has severe overcrowding. LGTU visited the site to speak with Travellers and found that 13 additional pitches were needed just to accommodate families who were currently overcrowded on the site. This did not include 15-20 households who had been brought up on the Thistlebrook site, now lived in bricks and mortar accommodation in Greenwich but wanted a pitch.

Given the 15 year timeframe of the Local Plan, the future needs of the current children on the site should also be included.

The Core Strategy provided no evidence of need, failing to mention either the 2008 study (which indicated the need for 22-45 additional pitches) or the waiting list. It simply asserted that need would be assessed at some point. No sites were proposed and the Council said this would be addressed by a Site Allocations Local Plan.

Key Lesson

Lewisham Council offered to identify sites in a separate Gypsy and Traveller Local Plan. This approach has been followed by some other Local Authorities and it has not been constructive for Travellers.
Hackney Site Allocations Local Plan

This is one of the Boroughs where LGTU has worked consistently with the local Traveller community to put its needs before Council officers and politicians. Despite this mobilisation, no additional pitch provision had been made since the late 1990’s.

Hackney Council had not disputed the identified need to provide between 13 and 34 additional pitches but argued that no land was available. This continued to be the position when the Site Allocations Local Plan came forward in 2014-15. However, in the Equality Impact Assessment there was no appreciation of the negative impact on Travellers health, education and family life, and no mention that many members of the Traveller community have been waiting 10 – 15 years for a pitch and having to live in unsuitable accommodation due to the Council’s inaction. Since it was beyond doubt that the Plan would be a serious disadvantage to Travellers, LGTU argued that there was a failure to comply with the Public Sector Equality Duty.

During consultations, LGTU had proposed 5 alternative sites which could accommodate Gypsy and Traveller pitches – these were not properly assessed by the Council. Then at the examination, LGTU proposed changes to 12 of the existing site allocations, so that Traveller pitches could potentially be provided as part of mixed use developments. These were sites where low density residential was proposed and with an industrial character, which have traditionally been used as locations for Traveller sites.

Hackney Council argued that none of these sites were suitable, and that what Travellers needed were smaller sites which could be identified through a separate Gypsy and Traveller Local Plan.

The Inspector’s report published in March 2016 found:

- At the hearing session I heard passionate and heartfelt representations to this effect, and about the difficulties caused by the absence of sites needed by the Gypsy and Traveller community. It is clear that people have been waiting for pitches for many years, over a decade in some cases. I have a great deal of sympathy with the points made and those who made them.

- This is an issue on which the Council is open to criticism. While I note the efforts made, more could, and should, have been done.

- With specific regard to this issue, the SALP as submitted does not meet the expectations of national policy, the Core Strategy or the London Plan. However, the Local Plan review which the Council has committed to through Main Modification 1 should rectify matters, and should ensure that the development plan as a whole delivers the sites required for Gypsies and Travellers.

Key Lesson

Although the strong direct voice of Travellers at the Examination in Public made an impact on the Planning Inspector, he accepted the council’s arguments that a separate Gypsy and Traveller plan is a suitable way forward.
There is one existing Gypsy and Traveller site in Merton, at Brickfields Road, and this has considerable repair and maintenance problems. These included no communal lighting, vibration causing cracking of walls, and heaters not working.

The Local Authority argued that several Travellers on this site would like to move into bricks and mortar accommodation (hardly surprising given these substandard conditions) and this would create enough vacancies to meet the identified need. Therefore there was a zero requirement for new pitches. This compared with the 2008 study which had identified the need for 16 additional pitches.

The accommodation needs assessment showed only 6 households in need. LGTU undertook a thorough examination of this document and highlighted several weaknesses such as the waiting list not being maintained and restrictions on the number of Travellers who were deemed to be eligible. 36 Travellers were interviewed but only 6 found to be in need.

Despite considerable debate at the examination, spilling over into an evening session, the Planning Inspector found the Council had collected evidence of need in a robust way and that the duty to cooperate was discharged.

The Planning Inspector did require that a new assessment of need take place in 2016, but this was the only achievement from a considerable input.

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**Key Lesson**

The disadvantage of taking part in examinations where local Travellers were not involved and where LGTU lacked local knowledge.
London Legacy Development Corporation (LLDC) Local Plan

In 2012 the Mayor of London established a new body as the planning authority for the Olympic Park and its surrounding area. Known as the London Legacy Development Corporation (LLDC) this includes parts of the London Boroughs of Newham, Tower Hamlets, Hackney and Waltham Forest in which LGTU is actively working with Gypsy and Traveller communities.

A significant issue was the Olympic Games relocation of the Clay’s Lane Travellers site, opened in 1971. Fifteen families had lived there at the time of the Olympic relocation in 2007. The relocation to Parkway Crescent in Newham was arranged in a hurry, with poor design and building works. Although residents were promised like for like accommodation, almost everyone had a smaller pitch, prefabricated units instead of bricks and mortar amenity blocks and were faced continuously with a range of drainage, sewage, plumbing and damp problems.

This was only expected to be a temporary move. The residents of Parkway Crescent had lived within the current LLDC area for around 40 years and were promised to be moved back into the Olympic Park after the 2012 Games. However, this promise was dropped because the LLDC could not identify a suitable site.

Another important issue was the Olympic legacy promise to improve Quality of Life standards across all 4 Host Boroughs. We found that the LLDC only gave attention to Travellers in one Borough, Hackney, despite compelling evidence from for example Travellers in Tower Hamlets about over-crowding on sites, a waiting list of 26 families and the need for new pitches for future generations of Travellers.

There was a major success in the allocation of Bartrip Street South as a Gypsy and Traveller site, the 1st new site in London for 20 years. However, this will only provide up to 9 new pitches when the identified need was for 19. Other sites could have been allocated and LGTU made specific suggestions as to how existing uses of sites could be changed – there could be relocation, there could be negotiations with landowners and leaseholders.

The Inspector’s Report found that Travellers living in all 4 Boroughs should have been fully involved, including the former Clays Lane residents, and the absence of sufficient sites to meet need was a weakness in the Local Plan.

This led the Inspector to require an annual check on whether new sites have been identified, with the whole policy to be reviewed if sites have not been identified by 2018-19.

Key Lesson
The new Bartrip site was achieved through Travellers taking a pro-active approach, proposing sites and suggesting how existing uses could be changed.
The London Plan sets the strategic policy context for the whole of London and is an important focus for Gypsy and Traveller organisations. The London Plan places requirements on the Boroughs and its evidence base is an important tool for the development of policy.

When the existing London Plan was produced in 2010, there had been considerable involvement by LGTU and Gypsy and Traveler communities across London. This is documented elsewhere [see glossary].

The London Plan is subject to revision on a regular basis and during the lifetime of the project there have been alterations and examinations in 2012, 2014 and 2015. However, the alterations are small and piecemeal and provide only limited opportunities for debate on Gypsy and Traveller issues.

In 2012, LGTU tried to make use of the duty to cooperate to give evidence at the Examination in Public, but this was ineffective.

In 2014, LGTU raised the failure of the London wide housing needs assessment to include Gypsies and Travellers but was not invited to take part in the examination.

In 2016 there will be a new Mayor of London and the production of a new London Plan. LGTU is working with a diverse range of community groups to influence the new Plan in its early formative stages.

Key Lesson
Travellers need to influence the wider process at City Hall, taking part in GLA research such as SHMA and SHLAA, and building relationships with GLA officers, Assembly Members and community groups.
Conclusions

Travellers face an uphill struggle against a planning system which has been failing to deliver public sites for Travellers accommodation for the past 20 years.

However, through the examinations in public, a light was shone on the injustice faced by Travellers, Local Authorities were held to account and real life information brought to the attention of the Planning Inspectors who were compelled to respond.

It is important to continue the monitoring of planning policy across London, at a time of significant changes to the national context. – the new definition of Gypsies and Travellers, the Housing and Planning Act and the review of Planning Policy for Travellers Sites.

There is a strong correlation between planning and housing and we now turn to consider housing mechanisms.
“All over London, there has been no provision made for Gypsy and Traveller sites for the last 20 years. From my experience as an activist, I feel that we have been just left out of everything. I cannot understand why my children cannot have a home the same as anybody else. When they build houses in London, they plan for how many people they need houses for. I feel my family has been left out in the cold as well as everybody else in the Traveller and Gypsy communities. There does not seem to be any future for us and I feel that at this moment it is like we do not exist. As far as I am concerned, we are just outsiders and we do not really have any availability for us.”

Marian Mahoney, Tower Hamlets resident
This section looks at the mechanisms of waiting lists for Traveller sites, the Traveller Pitch Fund programme, and Borough – Traveller Liaison Groups. There is consideration of an investigation by the London Assembly Housing Committee into the policy and practice of responding to Travellers accommodation needs across London.
There is no reason why Traveller provision should be treated any differently from other housing provision, including council housing. It should be planned for and it should be integrated with the wider housing and planning policy.

A number of questions are raised which require a comprehensive research study.

- Which Local Authority department deals with Traveller accommodation?

- Who is managing the Traveller sites?

- What is Traveller rent money paid for the caravan and for the site used for?

- What rights and duties are set out in the pitch licence agreement?

- What does this say about the repair responsibilities of the Local Authority?

- What does the Local Authority Housing Strategy have to say about Travellers and is there evidence of their housing needs?
Site maintenance and tenants’ rights
Travellers who live on a Local Authority site do not have the same relationship with their landlord as that enjoyed by Council tenants. For the council tenants for example, rent money (the Housing Revenue Account) will only be spent on tenant services, ensuring resources for management and maintenance, and there is significant investment in modern, efficient heating systems (Decent Homes).

On Traveller sites, there is often huge dissatisfaction with the maintenance of the site with a very poor repairs service and no investment programme. See earlier description of Brickfield Road (Merton) and Parkway Crescent (Newham).

Waiting lists
Having waiting lists that are properly maintained and that people know about is another issue. Councils might say, “We have a waiting list”, but they do not go and reach out to the community and explain how to get their names on that waiting list or what it is all about. The Traveller sites waiting lists should be co-ordinated with the wider housing allocation policies.

At the start of the project, LGTU used a Freedom of Information request to establish the base line for waiting lists. We found that only half of the 32 Boroughs had waiting lists and that these waiting lists were usually small – 6 Boroughs had less than 5 on the waiting list, 7 Boroughs had 5-10 on the waiting list, 4 Boroughs had 11-20 on the waiting list and 2 Boroughs had over 20 on the waiting list. These figures are serious underestimates; our experience is that Borough waiting lists bear little relationship to actual need.

Camden Liaison Group Case Study
It is common to have some liaison arrangements for the management of Travellers sites. This can be with the Housing Department of the Local Authority, or with Environmental Health (perhaps symbolic of how it is Travellers that are seen as a “nuisance”) or with an external managing agency.

In most cases they are poorly resourced and led by an officer with little authority. The system does not know where to place Travellers and what to do with them, except to place them in the margins.

In the London Borough of Camden liaision arrangements with the Housing Department were more formal than usual and included LGTU, a local councilor, and a planning officer as well as local Travellers and the Housing Department’s Temporary Accommodation Unit.

Funding and site search in Camden
In 2011/12 Camden was granted £700,000 through the Traveller Pitch Fund (TPF) programme to provide up to 10 pitches (which was the identified need for the next 5 years) on a new site or sites. The funding application was made by the Council without the input of Travellers, but once made known became a major issue at Liaison Group meetings.

Since Camden had not identified any sites, Traveller activist Johnny Power toured the area and drew up his own list of 18 sites that he presented to the Council. Visits to the sites took place involving a big time commitment from Johnny and other Travellers. Although 3 of the sites were assessed as ‘possible’ by the planning officers, the Council was not able to secure any of them as this required negotiations with land owners or find other suitable sites. Therefore, in 2013 the funding allocation was released and the Council claimed they were applying for £2 million from the TPF, to give them the funds to buy the land as well as to deliver new pitches. This was not pursued and the reasons were unclear.

Camden Travellers Association
This bad experience with the TPF together with poor maintenance issues on the Carol Street site, led to a loss of confidence in the Council Liaison Group. With support from LGTU, the Travellers sought to innovate with their own structure. Camden Travellers Association was constituted, administered by LGTU. This followed in the footsteps of Travellers Associations at Stable Way (Kensington and Chelsea), Eleanor Street (Tower Hamlets) and Parkway Crescent (Newham).
The Government makes available grant funding to provide new Traveller sites, more pitches on existing sites or for refurbishment. It is part of the Affordable Homes Programme with up to £60m nationally made available for 2011-15.

We studied the take up of this grant in London and found that nearly all bids were for refurbishment and where there were new pitches these were always extensions to an existing site. Even after funding was allocated to particular Boroughs, there were problems with delivery so that 2 Boroughs had to return the grant.

The GLA took over responsibility for the TPF programme in April 2012 (as part of the devolution of housing powers to London) with a budget allocation of (only) £1.55 million together with carried over funding of £700,000 that had already been allocated to Camden Council.

London Borough of Barking & Dagenham – £69,000 to improve twelve pitches on the existing site at Eastbrook End. Undertaking works to bring pitches up to a decent homes standard and installation of fencing to define site boundaries to improve safety and security.

London Borough of Lambeth - £192,233 to create one new pitch and improve ten pitches on the existing site at Lonesome Way. Works would create a new pitch, improve existing amenity blocks, provide a new community centre, and undertake major works to improve site safety.

Royal Borough of Kensington & Chelsea - £190,000 to create one new pitch and improve two existing pitches on an existing site. Works would reconfigure the site to increase accommodation capacity, create a new community centre, and supplement plans to enhance site safety and upgrade facilities.

Subsequently, Kensington & Chelsea had problems with site assembly, decided their project was not deliverable, and their allocation of £190,000 was withdrawn. Similarly, the London Borough of Camden allocation of £700,000 was withdrawn (see below).

The Mayor later decided to grant London Borough of Hounslow £766,000 to create six new pitches and improve twenty existing pitches on the existing site at Hartlands. The works were to upgrade existing amenity blocks to achieve a decent homes standard, utilise adjacent scrubland to increase accommodation capacity, and create new community facilities.
including a play area. The works were due for completion in December 2015 and led to changes in site management.

In a report dated 6th November 2013, the total programme would spend £1.027m delivering seven new pitches and improving forty-two existing pitches. From the total budget of £1.55m there was £523k unspent. However, there was often confusion by the Mayor as to whether these were new pitches or the refurbishment of existing pitches. See this exchange, in which the Mayor claimed 49 new pitches were delivered.

**Question to the Mayor 11 June 2014**

*Tom Copley*

"In response to question 2014/ 1486, you commented that the underspending of the GLA’s fund for Gypsy and Traveller sites is because the “programme is demand-led by boroughs and providers, who are able to bid for this funding.” Given that you abdicated any responsibility for planning such sites through your 2011 London Plan, what are you actually doing to encourage the delivery of new pitches? "

*The Mayor*

"My commitment to support London boroughs to meet the diverse needs of London remains strong. I successfully lobbied Government to increase London’s budget for the provision of sites through the 2011-15 programme, allocating over £1 million to deliver 49 pitches across the capital, which far exceeds previous delivery.

Further to this, I have made additional funding available through the 2015-18 programme. This remains a demand led element of the 15/18 programme. “
Traveller Pitch Fund

This information was updated when the Mayor wrote to the London Assembly Housing Committee 26 February 2015. The Mayor said £75,000 had been allocated to refurbish 15 pitches bringing the total spend to £1.193 million.

In February 2014, LGTU held a meeting with the GLA officer responsible for the Traveller Pitch Fund and discovered that small housing providers and indeed Traveller organisations could make applications. We found that the application form required evidence of community consultation and Lead Member support. It was also beneficial to hear that the programme could support schemes that included local jobs and had health impacts and indeed the GLA saw these as strengthening the bid. Voluntary and community sector organisations could provide these support services as part of a consortium bid.

Jamie Ratcliff (Assistant Director, Programme, Policy & Services, GLA) confirmed these possibilities in evidence he gave to the London Assembly Housing Committee in October 2014.

"To date all of our funding has been provided through boroughs themselves, but there is no reason that that has to be the case. We could provide funding to housing associations or other organisations. Indeed, I would welcome the chance to do so. I am aware of housing associations providing and managing sites in other parts of the country. If community groups wanted to set up organisations to get the funding and deliver it, then that would also be something we could do."

The Traveller Pitch Fund is still included as part of the Affordable Homes Programme 2015 – 2018 (total allocation £1.25 billion) but is no longer a separate funding stream and is not ring fenced. On the GLA website there is even less information (and encouragement) to make an application for TPF.

This makes monitoring and scrutiny much more difficult, for example, finding out whether any applications to the full programme are for Travellers pitches. Interestingly, bids for Traveller pitches would be part of the same specialist provision that includes older persons housing, community self build and community land trusts. Information about these alternatives and connecting them with Travellers needs is provided in the 3rd section of this report.
Elsewhere, we have described our input into the London Plan, for which the Mayor of London is responsible. We now turn to the London Assembly which is responsible for the scrutiny of the Mayor and takes up issues proposed by Londoners. In 2014, LGTU persuaded the London Assembly Housing Committee to conduct an investigation into the accommodation needs and provision for Gypsies and Travellers.

Process
An early meeting with the Chair and Vice Chair of the Committee enabled LGTU to influence the shape of the investigation including the format for the committee meeting, the questions in the call for evidence and to propose the 2 Traveller sites that would be visited. We were also able to share important documents, such as DCLG guidance on needs assessments, which Members and officers had been unaware of.

To prepare for the investigation, a meeting of the London Gypsy and Traveller Forum brought forward an extensive list of proposals:

- **What are the reasons for no new sites being delivered?**
- **What is the situation across London with regard to waiting lists and allocation policies?**
- **Is the Traveller Pitch Fund successful?**
- **Site visit to an unauthorised camp as well as an authorised site (this was agreed to by the London Assembly)**

LGTU was able to use its relationship with the committee to make arrangements for the Assembly to visit an authorised site in Southwark and an unauthorised site in Greenwich, including an opportunity for the local Traveller organisation – STAG – to make a presentation to the Assembly Members.

Community representation at Housing Committee Open Session 16 October 2016
At the London Assembly Housing Committee meeting on 16 October 2014, the first part of the meeting was a much valued open session lasting about 45 minutes enabling the public to take part in the discussion. This had been proposed by LGTU and Just Space as an innovation to the usual Panel only format. Several Gypsy and Traveller representatives took the opportunity to speak from the floor.

- **Marian Mahoney (Tower Hamlets)** spoke about the Council doing nothing to respond to long waiting lists and the impact this was having on the young generation
- **Tracie Giles (Newham)** on the broken promises of their return to the Olympic Park
- **Johnny Power (Camden)** on Camden Council sending the money back to the Mayor because it could not find any land
- **Bridy Purcell (Greenwich)** about 15 years living on a tolerated unauthorised site in Greenwich, and the health problems associated with living next to waste and cement factories.
- **Anne Marie O’Brien (Newham)** on the health problems caused by living in bricks and mortar and knowing your culture was not respected.

See Appendix 5 for a transcript of their contributions.
The meeting then heard from an expert panel that included Ilinca Diaconescu, Planning Policy Worker at LGTU. Bill Forrester (Head of Gypsy and Traveller Unit, Kent County Council) has been involved in developing about 200 pitches across Essex and Kent. His experience was that though site criteria might not always be met, the right thing was to aspire to the high quality provision you would look for in any development.

“As far as I am concerned, any site that I have been involved in developing, I like to go and stand on it, "Would I live here?" If I would not live there, then I will go back and say, “This is not a suitable place”.”

Rob McCartney (Head of Housing Support, Leeds City Council) explained how a scrutiny inquiry at Leeds exposed the negative impacts of unauthorized encampments and led to political will for a change in approach. Joint work followed with Leeds Gypsy and Traveller Exchange (GATE) on needs assessments and site selection.

“We use community members to develop the survey and also to carry out the survey work. That enabled us to identify concealed or hard to reach households. In terms of call for sites, it has got to be more than Gypsies and Travellers having the capacity to suggest sites. In my view, they need to be involved in the assessment process as well in terms of determining whether sites are suitable.”

A full transcript of the open session and panel discussion can be found on the GLA website in the minutes from the Housing Committee meeting on 16 October 2016.
The Housing Committee investigation led to the following actions being proposed:

1. The GLA should work with the boroughs to commission a London wide update of the GTANA to provide the strategic overview necessary to determine the number of new sites London really needs and to support their fairer distribution.

2. The GLA should consider releasing some of this land for the purpose of creating a pot of land that could be developed for additional Gypsy and Traveller sites and in particular to support the creation of a pilot negotiated stopping (see below).

3. The Mayor to reconsider the value of reinstating pitch targets in the London Plan.

4. The GLA should better publicise the availability of Traveller pitch funding as well as providing practical engagement throughout the process, ensuring timeframes are specifically tailored to the longevity of local land searches.

5. Publish details of further funding allocations, the criteria that will be used to allocate these funds and timelines.

6. The GLA should work with the boroughs on a pilot scheme for London to make land available for short-term Gypsy and Traveller sites modelled on the negotiated stopping site in Leeds.

7. The GLA should encourage the boroughs to adopt robust and fair waiting list procedures, taking into account Gypsies and Travellers involuntarily residing in social housing. These might be based on Kent County Council’s approach.

8. The GLA should ensure that Boroughs are equipped to regularly engage with their local Gypsy and Traveller communities, providing an accessible frontline point of contact in each borough.

9. The GLA together with London Councils should establish a mechanism to support and encourage sub-regional collaborative working in the context of provision of Gypsy and Traveller sites.

LGTU will work with members of the London Gypsy and Traveller Forum, London Assembly and other community groups and local authorities to push for the implementation of these recommendations over the next year.
The final section provides an overview of alternative ways of providing affordable accommodation in London, with insights into the main barriers to delivery and case studies of successful projects and what made them work. There is a focus on those specialist providers who address the needs of Black and Minority Ethnic communities, mapping their presence in a number of London boroughs.
With Gypsy and Traveller housing needs not being met by mainstream providers, we are seeking other courses of action and have started to research the role of alternative housing providers. In this final section, we offer insights into the role of smaller housing associations that support diverse needs, especially those supporting Black and Minority Ethnic groups, and into housing co-operatives, community self build and co-housing. We begin with these alternative forms of housing.

Alternative forms of housing are distinguished by a community led approach to housing production, ownership and/or management. They include housing co-operatives, community land trusts, community self build, co-housing, tenant management organisations and community housing associations (right to transfer). They help build strong and sustainable communities, provide mutual support, have the potential to limit property speculation and for all these reasons they should be scaled up.

Alternative forms of housing can create housing that safeguards genuine and permanent affordability. This is achieved by preventing the sale of the land that any buildings stand on, by keeping it permanently in community ownership, or by long-term restrictions on rent rises.

Key Challenges and Barriers

1. The most obvious key challenge in London is the acquisition of land. For alternative housing schemes to be successful there needs to be a transfer of land from other ownership at below market prices. Possibilities include the London Land Commission, Development Land databases, and land registers for different forms.

2. The lack of knowledge of alternative and mutual forms of housing among planners and other professionals and the community sector itself. We seek to address this through description and case studies for the different models.

3. The difficulty of accessing funding. Community groups often have to rely on a handful of smaller ‘ethical’ banks such as Triodos, as traditional lenders do not understand, or are unwilling to consider, the complex financial models of alternative forms of housing.
Despite the funding barrier, public funds are available. The Mayor of London has control over the Affordable Homes Programme for London, within which there are a number of targeted programmes.

**Build your own home – the London Way:** allocates £3m of revenue grant funding to support the Community Right to Build and £5m of repayable development finance for custom build housing. However, the funding programme is site-specific and provides help only to those groups that have already managed to secure land.

The Community Right to Build is one of the instruments for neighbourhood planning provided by the Localism Act 2011. It allows local communities to build new homes or other facilities without passing through the regular planning process. However, the proposed projects must be approved by more than 50% of local people voting in a referendum.

The Mayor of London commissioned a Build Your Own Home register, which is described as: an online resource for people who wish to express an interest in building or designing their own homes. The register will give City Hall wide-ranging data of interest and demand across London from those who are interested in Custom Build or customisation of their own home. It will also help us shape future housing policy for the city.

This can be accessed at: localselfbuildregister.co.uk/buildyourownlondonhome/

**The Targeted Funding Stream** allocated £60 million to bring empty homes back into use. There is potential here for the use of community-based alternative models; one example is the Granby Four Streets project in Liverpool - a community land trust which took over and renovated a whole neighbourhood of vacant properties.

**The Mayor’s Care and Support Specialised Housing Fund** allocates £30 million to encourage private developers to deliver purpose built affordable homes for older people and disabled adults.

These funding programmes are part of the existing Affordable Homes Programme 2015-18, but could be changed by the incoming Mayor in 2016.
Community-led forms of housing

Community Land Trusts

CLTs are mechanisms for creating community ownership and management of land, and ensuring that any profits are reinvested in the local community. CLTs employ a variety of legal structures and carry out a wide range of activities in response to the needs of the local community. The CLT model can be applied to different forms of housing, as well as commercial and community spaces. The defining characteristic of CLTs is that the assets remain permanently affordable. This is because the value of the land is legally separated from the value of the buildings and the improvements of the land.

East London Community Land Trust (ELCLT) will build 23 homes on the site of the former St Clement’s hospital in Mile End, East London, with the support of the Greater London Authority.

Rural Urban Synthesis Society (RUSS) is a non-profit community organisation based in Lewisham that is seeking to procure land from Lewisham Council so as to set up a CLT.

The three main barriers they have experienced are:

- Lack of understanding of the CLT model among both Lewisham Council and the local community
- Difficulty of procuring land - RUSS does not have the resources to go through the same procurement process as developers, as it relies very heavily on volunteers and the donated time of local professionals
- Difficulty of accessing funding – RUSS has to rely on ethical banks as traditional banks do not understand the financial model and are reluctant to develop new mortgage products to accommodate what remains a rare phenomenon

Cohousing

The idea of creating a neighbourhood is key to the cohousing ideal, which at its core is about the provision of common facilities. Cohousing developments can seek to provide affordable or social housing.

Low Impact Living Affordable Community (LILAC) in Leeds is a member-led, not-for-profit Cooperative Society. The group is pioneering a new model for affordable housing, known as a Mutual Home Ownership Society (MHOS), which ensures the properties remain permanently affordable: every household has a shareholding in the Society, to which they pay 35% of their net income. This is repaid when that household leaves.

Cohousing has the potential to provide significant benefits in housing provision for older people. It provides older people with the option to live independent lives for longer; social contact and support between individuals reducing the need for care. There are currently three senior cohousing groups in London, at various stages of development with the furthest advanced - the Older Women’s Cohousing group (OWCH) likely to complete on site late this year.

Housing Co-operatives

In accordance with the United Nations definition, a co-operative is ‘an autonomous association of persons united voluntarily to meet their common economic, social, and cultural needs and aspirations through a jointly-owned and democratically-controlled enterprise’

There are 4 types of housing co-operatives

- Tenant ownership co-operatives
- Tenant management co-operatives
- Short-life housing co-operatives
- Self-build co-operatives.
Co-operatives have many significant benefits

- Within their financial framework, tenants (co-op members) control their rents;
- Revenue made by the co-operative can be reinvested back into the co-op to improve the housing;
- Tenants control the quality of repair service by choosing the contractor who carries out repairs;
- Housing co-ops often organise other services and social activities for members, e.g. child care or wellbeing workshops;
- Co-ops often have wider social objectives – for example Vine co-op strive to accommodate disabled people and refugees.

In London around 83 co-operatives manage in total about 10,380 properties, housing an estimated 20,000 people. Examination of data held by the University of Sussex on London co-operatives found most co-operatives hold between 40 and 125 properties.

Phoenix Community Housing Cooperative currently manages 150 short-life properties giving 203 bed spaces and owns 16 permanent properties (an extra 57 bed spaces), all currently in the London boroughs of Hackney and Tower Hamlets. They have 260 members. Phoenix incorporates the Housing Plus project that utilises the voluntary labour of the co-op and construction trainees to refurbish empty property for significantly less than the market price. This is passed onto tenants as low rents. In 2012, the average rent for a room in a shared flat was just over £100 a week.

Community self –build

In self-build, in addition to securing land, finance and planning permission the end user also carries out the actual construction process.

There have been examples of self-build projects on a significant scale in London, notably in the borough of Lewisham, which has a strong tradition of self-build and self-commissioned housing, with more than 200 self-build projects built in the 1980s and 90s. The Council provided sites, which it continued to own throughout the building process; it provided each of the self-builder households with a mortgage, and transferred the properties to them at the end of the build process. Self-builders volunteered and were selected by straw poll from the council’s own housing waiting list.

Smaller Housing Associations

G320 represents small housing associations in London – with fewer than 1000 homes – many locally focused and many delivering specialist services. These include housing associations which focus on Black and Minority Ethnic communities, people with support needs, key workers, students or older people and which come in many shapes, including housing co-ops, almshouses and trusts. The G320 operates as a discussion group and forum to share information.

Some case studies are presented in Appendix 7
BME housing organisations make a significant contribution to meeting the housing, care, support and health needs of BME communities, plus those of new migrants, as these are not adequately met by mainstream social landlords. Benefits include:

- being anchored in the communities that founded them
- enabling local assets to be controlled by BME communities and considerable social capital to be built
- key vehicles for local people to have a say in how their housing is managed and developed

The Birth of BME Housing Organisations

BME housing organisations, generally defined as letting to more than 80% BME applicants with a similar proportion of board members, have deep roots going back thirty years in the most disadvantaged communities of Britain’s major cities and towns.

BME housing organisations grew out of the need for greater access to social housing by BME communities, in the wake of 1980s disturbances and the growing special needs of BME communities (especially the elderly and young homeless people). They were created at a time when ‘race and housing’ issues were at the forefront of national policy debates against a backdrop of urban decay and social unrest. When BME housing organisations were formed, they also made mainstream providers sharpen up and get beyond colour blindness practices to positive action for those in most need. And even though there are fewer today than at their peak, the majority are viable community-based social enterprises providing culturally sensitive services.

Their representative body – the Federation of Black Housing Organisations (FBHO) – was a highly visible advocate for the BME housing sector. The demise of the FBHO was followed by the creation of BME National as a successor body under the auspices of the National Housing Federation.

Role of the Social Housing Regulator

The BME housing sector was supported by a series of Housing Corporation policy documents as a public response to a long line of ‘race and housing’ reports from the 1970s onwards. These reports showed that many BME communities experienced direct and indirect discrimination in all tenures, including via social housing allocation policies. The Housing Corporation in 1986, ten years on from the Race Relations Act 1976, launched its Black and Minority Ethnic Housing Policy to directly and indirectly support existing and embryonic BME housing associations to develop housing, board members, staff and to add value to the local community. Within five years more than 40 BME housing associations had been created, later rising to over 100.

In the last decade BME housing associations have been under pressure to join large Housing Associations. Some have thrived within group structures. For example, Ashram is now Ashram Moseley, having joined with a mainstream provider – Moseley and District – within the Accord Group. Other BME housing associations were less fortunate in their choice of group and were subsequently wound down, their housing assimilated.

The Shape of the BME Housing Sector Today

Collectively, the 70 remaining BME housing organisations manage 65,000 homes. They retain their role in meeting the special needs of BME communities but most have branched out over the last fifteen years into meeting general family needs and the needs of homeless people and refugees and asylum seekers.

See Appendix 6 for a directory of London BME Housing Associations

Source: Deep Roots, Diverse Communities, Dedicated Service - The Legacy, Value and Future Potential of Black and Minority Ethnic Housing Organisations in England by the Human City Institute August 2015
Appendices
The National Planning Policy Framework (NPPF) includes a separate document Planning Policy for Traveller Sites (PPTS). This requires Local Authorities to

- 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)
- Work collaboratively with neighbouring local planning authorities
- Provide an up to date and robust evidence base of the need
- Identify and update annually a 5 year supply of land to deliver specific Gypsy and Traveller sites to meet the need

The Government gave local authorities a target of March 2013 for including policies for Gypsy and Traveller sites in their plans.

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental and social framework for the development of London over a 20 year period.

The London Boroughs are required to have a Local Plan, which is in general conformity with the London Plan and sets out policies for how their area will develop over a 15 – 20 year period. The Local Plan is made up of the following documents:

- Core Strategy – the strategic planning policies
- Site Allocations – specific locations for development
- Development Management – more detailed policies

The timetables for preparing these documents are set out in the Local Development Scheme.

Prior to the document being adopted, there is a process of evidence gathering, consultation and finally an Examination in Public. This is overseen by a Planning Inspector appointed by the Secretary of State to ensure the Plan complies with all legal requirements, and is positively prepared, justified, effective and consistent with national policy.
Appendix 2: Community resourcing for the Examination in Public

Respond to early consultations and meet planning policy officers

Respond to the Local Plan consultation prior to submission in order to be invited to the examination hearings

Respond to the Planning Inspector’s draft Matters and Participants

Respond to the Planning Inspector’s invitation to submit written statements on their questions

Attend the pre-hearing meeting to influence the process of the examination

Research what other participants have produced and the evidence base

Attend workshops or one-to-one meetings with other community organisations attending the EiP, so as to gain support from them in written statements and at the hearing sessions

Training Traveller representatives about the EiP process, collecting evidence and supporting Travellers to make own representations and to participate at the examination hearings

Coordination of inputs at the examination hearings

Comments on Main Modifications resulting from the EiP hearings

The Examination in Public (EiP) process requires different resources at different stages.
The periodical review of housing needs under section 8 of the Housing Act 1985 is a statutory duty on local housing authorities. This requires local housing authorities to assess and understand the accommodation needs of people residing or resorting to their district. It includes the duty to consider the needs of people residing in or resorting to a district with respect to sites for caravans and the mooring of houseboats is part of that requirement.

The draft guidance to local housing authorities on the periodical review of housing needs Caravans and Houseboats Guidance (DCLG 2016) sets out the methodological principles for carrying out these assessments. One of the key recommendations is to engage local Gypsy and Traveller communities in the production of the study, from the early stages of scoping, deciding on the interview approach and designing survey questions. Another important aspect of the guidance is that it suggests ways of including Gypsies and Travellers living in bricks and mortar in the assessment of need for site accommodation.

GTANAs are the main source of evidence to inform local plan-making processes. An adequate strategy to meet the current and future needs of Gypsy and Traveller communities depends on how accurate the evidence is. The PPTS requires local plans to be based on robust evidence of need assessed at a local level with the participation of the community and support organisations.

In responding to planning policy consultations one of our main concerns has been the robustness and accuracy of the GTANAs underpinning local plans. Over the last three years we have produced extensive critiques of the methodology used to conduct GTANAs in different boroughs. The following is a summary of the main recurring issues:

- **Blanket approach**

  Most local authorities commission external consultants to undertake their GTANAs. Many of these consultants apply the same methodology everywhere, without taking into account the local context. Their research is largely desktop-based, although it can sometimes include other research such as phone interviews with Gypsy and Traveller support groups and local or national organisations. Taking part in such interviews we have come across questions which are irrelevant to the London context and show a poor understanding of the issues facing local authorities and Traveller communities in the capital, which are very different to rural areas for example.

- **Limited local knowledge**

  The relationships between the local authority and Gypsies and Travellers living in the area are extremely varied across the London boroughs. This is mainly due to an incoherent approach to site management and specialised service provision. In some places the site manager or Gypsy and Traveller liaison officer have a long-standing relationship with the community and this is reflected in their knowledge and understanding of arising needs.

  In other cases the site is either managed by an external agency or not managed at all, meaning that the local authority has very little contact with the community. With the significant budget cuts in recent years many valuable posts such as Traveller Education Officers or dedicated health visitors have disappeared from most local authorities leaving no point of contact with housed Gypsies and Travellers.
In some boroughs there are very active community groups or support organisations but they may also be facing funding pressures and have limited capacity to engage on policy issues. In some localities there is no form of organisation or representation for Gypsy and Traveller communities. All these factors affect the ability of consultants to have a wide spread reach within the community, and consequently the quality of data in GTANAs.

- **Inadequate interview methodology**

As consultants are often based outside of London, their fieldwork availability is limited or they budget for a small amount of interviewer hours. A common approach in many GTANAs is for interviewers to show up on Traveller sites unannounced. In some cases a letter is sent out in advance publicising the GTANA and inviting people to ring up the consultants if they want to be interviewed. From our experience and observations this approach usually results in a very low response rate and an unwillingness to engage with the interviewers, as the importance of the study is not fully explained.

- **Excluding housed Gypsies and Travellers**

One of our main concerns is the approach to assessing the needs of housed Gypsies and Travellers for site accommodation, as they make up over 80% of the Traveller population in London. The key to this, as explained above, is to ensure housed Gypsies and Travellers are adequately involved in this process and additional resources are dedicated to outreach work in these communities, as they might not have obvious links to site residents. Secondly, it is essential how the assessment of need versus preference is framed.

We have found that the assumption made by consultants and local authorities is usually that Gypsies and Travellers living in bricks and mortar might have an ‘aspiration’ to live on sites, or a ‘need’ if they can demonstrate an aversion to their accommodation. The reality however is that what drives most Gypsies and Travellers into housing is a lack of sufficient (or adequate) site provision. The shortage of provision, the closure of many local authority sites and prohibitive land prices (for those who might want to live on private sites) have had the consequence that most Gypsies and Travellers growing up on sites never had the choice for culturally suitable accommodation when they formed new families.

- **Underestimation of need**

All the examples of flawed practice given above lead to significant underestimates of actual need, which is evident in the discrepancy between the 2008 GTANA figures and the findings of local GTANAs conducted since 2012 (see page 10 of this report).

- **Applying the new planning definition of Travellers**

Since the planning definition of Travellers was changed in August 2015 to exclude those who have ceased to travel permanently, there is a danger that GTANAs will not take into account the needs of all Gypsies and Travellers regardless of their status (see examples on page 8). Local authorities should ensure they understand the accommodation needs of Gypsies and Travellers in their area and acknowledge when those who have stopped travelling for a range of reasons (ill health, disability, caring for children and family, accessing education and employment, being unable to travel due to shortage of transit sites and stopping places etc) - living both on sites and in housing - still need caravan site accommodation. They should pay particular attention to the future needs of young people and children. Local authorities should ensure the evidence base for their local plans includes an assessment of all Gypsies and Travellers, not only those meeting the planning definition.
An example of good practice – Hackney GTANA

Due to the long-standing campaigning and dialogue initiated by the Traveller community with Hackney council, the local authority has acknowledged the importance of a co-operative work approach in conducting the GTANA.

Hackney council contacted LGTU in the very early stages of the GTANA commissioning process to get our comments and recommendations on the consultants tendering brief. This opened up an opportunity to shape significantly the approach, methodology and to some extent the interpretation of the study.

We requested the council to set up a working group on the GTANA including members of the Traveller community, the Traveller Strategy Officer, LGTU staff and senior planning officers to discuss the most adequate approach to conducting interviews, designing questionnaires, publicising the GTANA and reaching out to members of the community not living on sites and not registered on the council’s site waiting list. These issues were discussed at an initial meeting with the consultants undertaking the study and the group’s recommendations were taken on board.

The GTANA was publicised through flyers distributed on the local authority sites and to Travellers living in bricks and mortar, as well as through posters displayed in the LGTU office for those using the Accommodation Advice Service. These were written in clear and simple language to explain the importance of taking part in the interviews. A few Hackney Travellers also shared information with their relatives and the wider community to maximise awareness of the study, interview dates and what sort of questions would be asked.

The Hackney Traveller Strategy Officer took the role of publicising the GTANA in advance and making sure most people are at home on the days when interviews were set up. She also accompanied the interviewers on the sites and facilitated face to face and phone interviews with households living in bricks and mortar registered on the waiting list.

Through the Accommodation Advice Service contacts LGTU helped set up interviews with other Travellers living in housing who would not have been reached otherwise. The LGTU premises were used for interviews, with an appointment system managed by the AAS team to ensure people had a range of choices for interview times which suited them.

A significant number of Traveller families were engaged through this collaborative process, therefore the findings of the GTANA were far above the 2008 study. This model of working has been rolled out to some extent to Haringey and Newham.
Written statement by LGTU

LGTU considered the Local Plan must be prepared in accordance with the LLDC’s Statement of Community Involvement which states that the LLDC will make special arrangements to ensure that hard to reach groups have the opportunity to be involved in the planning process. The SCI includes Gypsies and Travellers as a community groups that is hard to reach. We were not aware of any efforts made by the LLDC to approach members of the Gypsy and Traveller community to take part in the consultation.

LGTU had sought to influence the Local Plan preparation by asking that the planning policy team should tap into the resources and local knowledge of the Gypsy and Traveller communities in the 4 Boroughs and actively engage with them through meetings and site visits. But despite further requests for a meeting, this was not held until July 2014, after the research for the Local Plan had been completed and there was no opportunity to influence methodology or practice. We therefore consider that the Plan had not been prepared in accordance with consultation principles and had not actively sought to include members of hard to reach communities in the process.

The Duty to Cooperate had not been fully met in producing the evidence base. The LLDC had worked together with LB Hackney to assess the needs of Travellers and to identify a potential site allocation. However the LLDC had not worked effectively with the other neighbouring boroughs, particularly Newham, to understand the needs of Gypsies and Travellers living in very close proximity to the LLDC area. The LLDC disclosed that it had only discussed Gypsy and Traveller needs over the phone with Council officers and the published summary of these discussions revealed very little knowledge of the needs of the community.

We pointed out that Tower Hamlets and Waltham Forest had unmet Gypsy and Traveller accommodation needs. Paragraph 5.25 of the Local Plan states that the whole of the identified Gypsy and Traveller needs will not be met through the proposed site allocation, and the LLDC will work with neighbouring boroughs to seek to meet them. We requested a detailed plan of how this work will be carried out.

The LLDC undertook a Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2014 that included a scenario which looked at the need from Parkway Crescent in case the commitment to relocate it within the LLDC was kept. There was no reference to this in the Local Plan.

We are concerned that the Local Plan cannot meet the identified need for 19 new pitches. We fully support the allocation of Bartrip Street South as a Gypsy and Traveller site, the 1st new site in London for 20 years. Other sites could have been allocated and LGTU made specific suggestions.

31-41 White Post Lane and 90 White Post Lane: The only constraint listed in the site assessment is the fact that sites are within flood zone 3. We would point out that another existing Hackney site, St Theresa’s Close is also in flood zone 3 but this has been addressed in order to make the site available for the Olympic relocation. The ownership of 90 White Post Lane can be researched and negotiations can be carried with the land owner to explore the possibility of Gypsy and Traveller site provision.
Land at Bartrip Street/Wick Road (Bartrip Street North): The site is designated as a Locally Significant Industrial Site, but the study recommends that the employment use is reviewed in the future. We would suggest that the LLDC carry out discussions with the leaseholders to assess whether there is scope for them to relocate to another suitable site or whether they can be accommodated on one of the sites proposed for employment allocation in the Local Plan.

Chapman Road Depot Site: The same constraint as above. From our knowledge this is a Hackney Homes depot and is not being used for significant employment uses, but mainly for storage. We would suggest the LLDC and Hackney explore the possibility of accommodating this use elsewhere and change the designation of the site.

This policy requirement would make it almost impossible for any proposal to be taken forward. Gypsy and Traveller sites are not seen by landowners or developers to be viable and competitive forms of housing provision. Proximity to other Traveller sites is important, but in the context of the LLDC will limit potential sites to the Hackney Wick area. We suggested that the above 2 criteria be deleted from the Local Plan.

Planning Inspector’s Report

33. Provision for Gypsy and Traveller accommodation is addressed in Policy H5. With reference to national policy, Policy A in Planning Policy for Traveller Sites, March 2012, there is concern that Travellers living in all four Boroughs not just those within the Development Corporation boundaries should have been engaged more fully in the Local Plan’s preparation. Former residents of Clay Lane point out that they were moved out of the area because of the Olympic Games to a site which has “very poor standards”. They were promised a reassessment of the potential to relocate within the Development Corporation area after the Games. It is argued that there is a shortage of sites and much overcrowding on Traveller sites close to the Local Plan area in Tower Hamlets and Newham.

34. It is contended that a pitch target should be set in the Local Plan policy, and referenced in the monitoring and review section. Whilst the allocation of a new site at Bartrip Street South is supported, this site is not sufficient to meet identified needs for the full plan period. It is suggested that the Local Plan should commit to delivery of this site within the next 5 years, and set out how the Corporation will work with the neighbouring Boroughs and Gypsy and Traveller communities to meet additional requirements for sites over the plan period.
35. The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment [LEB/8] and Gypsy and Traveller Site Assessment Study [LEB/9] provide reasonably up-to-date evidence of need, the results of which are given in paragraph 5.25 of the Local Plan. LEB/9 includes an assessment of potential sites but concludes there are no suitable sites available in the area. The Housing Position Statement [LD/28] explains that, as the Corporation is not a housing authority, it relies on the Boroughs for housing Gypsies and Travellers in their areas. In LD/28, the Corporation states that it will continue to work with the Boroughs to address additional unmet need once they have reached an appropriate point of review for their local plans. I appreciate the Gypsy and Traveller communities’ concern that equal engagement and inclusion with the various communities has not happened across all the Growth Boroughs in the past, and this needs to be addressed in the Local Plan.

36. National policy (Policy B of Planning Policy for Traveller Sites) is clear that Local Plans should identify specific deliverable sites for the first 5 years and specific, developable sites or broad locations for sites for years 6 to 10 and, where possible, years 11-15. I accept that the complex arrangements of governance limit the Development Corporation’s position to promote and guarantee delivery of necessary Gypsy and Traveller pitches. Nevertheless, the absence of sufficient sites is a weakness in the Local Plan. The Corporation has put forward modifications to Policy H5 to (i) confirm future co-operation with Gypsy and Traveller communities over accommodation needs; (ii) identify and update annually available sites to meet the 5 year supply, and sites or broad locations to meet the 6-10 year supply, against pitch requirements; (iii) commit to co-operate with each of the Growth Boroughs to address need; and (iv) monitor performance, and review Policy H5 if the policy aims are not being met by 2018/19. I consider that MM12, MM13 and MM14 as proposed by the Corporation are necessary to achieve a sound approach to meeting the needs for Gypsy and Traveller accommodation.

37. These modifications would also amend criterion 4 in Policy H5 to clarify that policies concerning local amenity and environment are intended, and to omit the reference to viability being a strong consideration from paragraph 5.26. They should be made to ensure a positive planning rather than a restrictive approach to meeting the needs of Gypsies and Travellers.

The Inspector required the following modifications:

The Legacy Corporation will seek to provide for the needs of Gypsies and Travellers generated within its area through working strategically with neighbouring boroughs and co-operating with Gypsy and Traveller communities to allocate suitable sites.

The Legacy Corporation will monitor any unmet need through the monitoring and review process which will include updating evidence, investigating capacity requirements or amending targets where required and will cooperate with each of the Growth Boroughs to address wider strategic issues of accommodating need for Gypsy and Traveller accommodation once they have reached an appropriate point of review for their local plans.
Marian Mahoney: My name is Mrs Marian Mahoney. I was living at Eleanor Street - it is now called Old Willow Close. I am a Gypsy Traveller. I have been an activist all my life and my experience is the Mayor never put any targets for Gypsy sites in Tower Hamlets in the London Plan and it was supposed to be that it was sent down to the councils. The councils just do not seem to be doing anything whatsoever about it. Actually, on our waiting list, there are 25 people at the moment, who have been there for the last three years. There are other children coming up on our sites who will need homes, which will probably come to another 25. There is no provision for them.

All over London, there has been no provision made for Gypsy and Traveller sites for the last 20 years. From my experience as an activist, I feel that we have been just left out of everything. When they can find room for garages, Tesco, Morrisons, whatever they want to find room for, they can. I cannot understand why my children cannot have a home the same as anybody else. When they build houses in London, they plan for how many people they need houses for. There is nothing at all for Gypsies and Travellers. I feel my family has been left out in the cold as well as everybody else in the Traveller and Gypsy communities. There does not seem to be any future for us and I feel that at this moment it is like we do not exist. As far as I am concerned, we are just outsiders and we do not really have any availability for us.

Actually, my children are ending up going into houses and reversing their roles from being Travellers and going into houses. There is no room on the site at the moment for them. There are 25 people on the waiting list and there are six pitches available. It is causing havoc amongst the Traveller and Gypsy communities. It is causing bad feeling. It is causing us to lose our ethnic minority status and it is also causing a lot of people to lose their culture. Our children are going into houses and some people have been affected by mental health. My own daughter has.

She has exchanged her home in Eleanor Street where she was born and reared, which is now Old Willow Close, and she has ended up living in a flat in Walthamstow with her children, with the railway line just over her and the main road outside. Her youngest is two and the other one is five. Her children have to come all the way from Walthamstow to school in Tower Hamlets every morning. Our lives are just devastated. I really feel that the councils are not doing anything whatsoever for Gypsy Travellers.

Tracie Giles: My name is Tracie Giles and I am an English Romany Gypsy and I live in the London Borough of Newham. I currently live on one of the relocation sites for the London Olympics. We were relocated in 2007 and the site we now live on was poorly built. The Mayor gave a lot of money to relocate us and I do not know in that whole process exactly what happened, but towards the end they ran out of time and the site we are now living on is actually falling to bits around us, literally. However, the Mayor did give a commitment to move us back to where we originally were within the Olympic Park.

In 2011, residents were consulted on an option but were not told at that time that this was the only option. We were under the illusion that there were going to be options and now we have been told that that option has now gone. It is being used for affordable social housing and allotments and whatever. There is no option and there is no land to move us back. We have been left high and dry, really.

My second point is about the duty to co-operate. The London Legacy Development Corporation (LLDC) recently did its needs assessment for Gypsies and Travellers. Parkway Crescent is right outside of the Olympic Park and they did not consult and they did not take the needs of the Gypsies and the Travellers who have been in the borough for over 40 years on that site. They did not count the needs, let alone for the rest of the Travellers who live in the borough.
**John Power:** My name is John Power. I am with the Camden Travellers Association. My wife and children and I moved to a place in Camden 34 years ago. We have been promised several places or sites and there was £700,000 given to the Council, but they said they could not find any land. We went out and we found the land for them, land that would never be used for building or anything. We approached them with this land and they said they would have to go through the owners and get permission and things like that. The money was sent back. The money did not have to go back until April 2015, but it has gone back from October 2013.

This law that they are trying to bring in, where people are not allowed to get sites when they are in houses, is going to destroy people. It is taking away their culture from them. It is like if you see country people - we call them 'country people' - settled people. If you take away their land for vegetable plots and harvesting, it is not going to be very nice for them. Some of the Travellers are taking this very, very hard. We have been there now 34 years, as I say, and there has been nothing done whatsoever. We have tried everything with the Council. We have abided by everything they have said. We have fitted in with the community. Yet it is no good.

**Bridy Purcell:** Hello, I am Bridy Purcell. Because there are shortages of sites, we have now been on a tolerated unauthorised site in Greenwich for the last 15 years, which you all have seen. On the site, we have 10 adults and 25 children and two on the way. On our site, it is absolutely ridiculous. We have been there 15 years with no showers and no toilets. We have portable loos. The site is literally a bombshell. Just behind us we have a big tarmac yard, at the bottom of us is a big waste factory and behind that is a cement factory, as you have all seen yourselves. The amount of dust is unbearable, literally, and the health problems have been very bad. My Granny went to the doctors and they told her she has the lungs of someone who has smoked for 40 years. She has never smoked in her life. All of our children get continuous ear infections, eye infections and everything because of all the dust around the camp.

Thankfully, we have very good schools and, for all of our children, we are keen for them to get an education. All they really need is a proper place to live. It is not much to ask for a bit of land where we can actually have showers and maybe even a proper kitchen block because we are all squashed in there. I am 17 years of age and I do not have a trailer. I share a trailer with my siblings.

We are being deprived of a space because we are not getting any further with the Council, really. It is like we are nothing, to be honest with you, because we are not getting any kind of help in any way. They sit there and they say, "Next year, next year". Where we are now, as you have all seen, the flats are going up. We are getting told now, "You will not be there for more than two more months". Where are we going to go after that?

There is no such thing as travelling and moving around anymore because we are not allowed to do that. Our cultures are being destroyed, basically. If we wanted to go and get anywhere to live, not only would there be no planning permission to get anywhere to live, but there is nowhere to go in London. That is worst of all for us.
Anne Marie O’Brien: My name is Anne Marie O’Brien and I live in Newham and I have been talking for Travellers for quite a long time now in Newham, trying to get facilities for them and trying to get a site built there, but everybody knows our Mayor in Newham and he will probably be there a long time. I will probably be dead and he will still be there. He does not do anything for us. He does not recognise us.

It is very disappointing to know that we are a culture, we are people, we have our own culture and we accept every other person’s culture and respect it, and we are not respected. We are not asking for much. We are not asking, “Give us this. Give us that”. We are well able to look after ourselves. We are well able to look after these sites and run them properly. Only give us the land and put us into them.

I live in a house and I am blessed in the house, but in the house that I am in we are suffering from depression inside it because I do not have the support of my family for my daughters. My daughters have bipolar. They are depressed and one of them is suicidal because I am not with my family. They have put me into a culture that I know nothing about and now the National Health Service (NHS) has to pay the price for it because my daughters are in counselling, on medication and everything you could ask for.

It is not that we do not respect the community. We do, but we like our own community and we respect our own way of living. I do not think that is recognised in London. I do not think it is recognised by the councils. I know for sure it is not recognised in Newham. I know for sure it is not recognised. All I want is to know why is there not a caravan waiting list in Newham? Why is someone in Newham not saying, “Mrs O’Brien, we can call a meeting with you. We will try”, not, “Do it”, because I am asking for a miracle, but try.
**Appendix 6 Small Housing Associations in London**

**CHISEL** is a neighbourhood housing association based in south-east London, which provides a range of homes for people in housing need and on low incomes. CHISEL is committed to self-build and co-operatively run housing at its core. It manages about 250 homes in south-east London.

**New World Housing Association** started out in the 1980’s as SEA Co-op managing shortlife properties for newly arrived Vietnamese families. By 1992 it had developed into New World Housing Association, registered with the Housing Corporation and taken ownership of its first permanent schemes. Today the association owns and manages over 300 homes throughout South London with its aim to provide high standards of housing and services to local communities, in particular the Vietnamese community.

**Re-Unite** was set up by Housing for Women, Commonwealth Housing and Women in Prison. The aim was to address the ‘catch 22’ faced by women leaving prison who have children. They can only get single person housing so cannot have their children live with them. This causes emotional distress, leads to family breakdown and can ultimately lead to re-offending. Re-Unite, which started in 2007 in London and is now being replicated in other parts of country, gives the women temporary housing. It also gives support to all the family to help it re-bond, develop a healthy relationship and manage their lives together in a stable and secure home. Housing for Women provides 10 homes in Lewisham, Greenwich and Southwark.

**Inquilab and Innisfree** housing associations both wanted to do more to help neglected minority groups locally. “Integrated in Brent” was an innovative partnership set up to give refugee community organisations practical support, training, guidance and capacity building, to promote better understanding and participation, and to allow access to social housing for their clients. The two-year project, led by Innisfree and Inquilab, but including Brent Council and the Brent Refugees and Migrants Forum, was the first of its kind in London. It was funded by the council, the Tenant Services Authority, Fortunegate HA and Network Housing Group.

These case studies are taken from the publication by Helen Cope – *The role and value of small housing associations in London, 2012*
### Appendix 7 Directory of London Based BME Housing Associations

<table>
<thead>
<tr>
<th>Arhag</th>
<th>Imani Housing Co-op</th>
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<tbody>
<tr>
<td>Unit B, Ground Floor, Mary Brancker House, 54-74 Holmes Rd, London, NW5 3AQ</td>
<td>2 The Haylofts 17a Seely Rd Tooting London SW17 9QP 020 8672 1800</td>
</tr>
<tr>
<td><a href="https://www.arhag.co.uk/">https://www.arhag.co.uk/</a> 020 7424 7370 Total 850 units, Newham 323, Tower Hamlets 121, Camden 75, Southwark 32, Lambeth 23, Lewisham 11. 80% of residents are BME. Rise employability programme.</td>
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<thead>
<tr>
<th>ASRA</th>
<th>Innisfree</th>
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<tbody>
<tr>
<td>ASRA House, 1 Long Lane, London, SE1 4PG</td>
<td>190 Iverson Rd, London, NW6 2HL 020 7625 1818</td>
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<table>
<thead>
<tr>
<th>Bahay Kubo</th>
<th>North London Muslim</th>
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<tr>
<td><a href="http://www.bahaykubo.org.uk/">http://www.bahaykubo.org.uk/</a> 020 7281 4477 Provides housing for Filipinos in Camden and Newham</td>
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<tr>
<th>Bangla</th>
<th>Odu-Dua</th>
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<tr>
<td><a href="http://www.banglaha.org.uk/">http://www.banglaha.org.uk/</a> 020 8985 1124 259 units, 174 in Hackney. Aimed at Bengali community with emphasis on older persons.</td>
<td>184 homes, majority in Camden. Set up to meet the needs of single homeless Black men, using shortlife properties in Camden.</td>
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<tr>
<th>Ebony Sistren</th>
<th>Simba</th>
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<tbody>
<tr>
<td>Accommodation for 45 single homeless BME women in Shepherds Bush, Hammersmith and Fulham.</td>
<td>7 shared houses in Greenwich for African Caribbean youth aged 18 – 25 years</td>
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<tr>
<th>Ekaya</th>
<th>Spitalfields</th>
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<tbody>
<tr>
<td>First Floor, Lincoln House, 1-3 Brixton Rd, London, SW9 6DE 020 7091 1800</td>
<td>78 Quaker St, London, E1 6SW 020 7392 5400</td>
</tr>
<tr>
<td>440 homes for BME women in Southwark, Lewisham and Lambeth. Runs a community nursery. Member of South London Federation of small Housing Associations (SOLFED).</td>
<td>781 homes. Began as a co-operative and provides for Bangladeshi community. Mostly Tower Hamlets, with some in Hackney and Newham.</td>
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<tr>
<th>Home from Home</th>
<th>Tamil Community Association</th>
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<tr>
<td>Provides homes in East London.</td>
<td>Formerly Tamil Refugee Housing Association and grew out of Tamil Refugee Action Group. 220 permanent homes and 40 shortlife majority in Hackney and also in Newham, Lambeth, Lewisham, Greenwich, Barking and Dagenham.</td>
</tr>
</tbody>
</table>
We Still Count campaign - protest against the government’s changes to the planning definition of Gypsies and Travellers, November 2014