

# **From: London Gypsy and Traveller Unit Response to the Merton Submission Draft Sites and Policies Plan**

**30 August 2013**

We would like to make the following comments on the Merton Submission Draft Sites and Policies Plan regarding the Position Statement on meeting the accommodation needs of Gypsies and Travellers in conformity with the Planning Policy for Traveller Sites.

We hope that the format of our response and our consideration of the tests of soundness (which we do not feel are met) is appropriate. We could find no pro-forma, or guidance about regulations that need to be followed, on Merton's website and we would ask the Inspector to take this into account.

In our response to the previous consultation on the Merton Sites and Policies DPD we raised a number of concerns regarding the level of need identified in the Merton Gypsy and Traveller Accommodation Needs Assessment from 2011, the lack of a 5-year land supply for Gypsy and Traveller sites and the Duty to Cooperate with neighbouring Boroughs, the Gypsy and Traveller community and support organisations.

In June 2013, the London Gypsy and Traveller Unit discussed these concerns at a meeting with Merton Planning Policy officers. The notes from the meeting together with our previous consultation response are attached to this submission as further evidence.

Although this meeting clarified a number of issues raised in our previous consultation response, we are not convinced the approach taken by Merton Council regarding provision for the Gypsy and Traveller community is a sound and positive strategy consistent with the requirements of the Planning Policy for Traveller Sites.

First of all, we consider the Position Statement on meeting government guidance on the accommodation needs of Gypsies, Travellers and Travelling Showpeople to be unsound because it is not sufficiently justified. In regard to the 2011 Merton Gypsy and Traveller Accommodation Needs Assessment, we consider the methodology used in conducting the survey to be flawed.

In particular, we object to the process of filtering down the responses so that in the final analysis only 6 out of 36 responses are taken into consideration. The filtering only includes responses from Travellers who provided verifiable bricks and mortar addresses in Merton. This excludes those not currently resident in Merton. Furthermore, from our experience in working with this community, Gypsies and Travellers are generally reluctant to provide such information to the authorities. This filtering process has excluded a significant number of Merton Travellers from the final analysis, as only 13 out of 19 responses were considered when assessing the level of need.

There is then further filtering based on an assumption that differentiates between 'cultural preference' to live on a site and 'actual need'. Although the majority of respondents (91%) rated living on a site as essential, important or very important, this was not considered when identifying the level of need. A question regarding the reasons for not living on a site was used to determine how many households would require living on sites. Only the responses of 6 Merton residents with verifiable addresses were taken into account.

In our view this is not a robust assessment of need and it does not provide sufficient evidence to support the policy statement in the Sites and Policies Plan. We are also concerned that the waiting list for pitches is not maintained effectively and further discourages Gypsies and Travellers from accessing pitches in Merton. None of the 6 residents who were identified as in need in 2011 were registered on the waiting list.

As stated in our previous consultation response, the Sites and Policies Plan should seek to meet the need identified in the 2008 London GTANA of 4-16 pitches by 2017, by allocating sites for Gypsy and Traveller accommodation or integrating Gypsy and Traveller pitches on larger housing development sites.

With regards to the emphasis on the needs of housed Gypsies and Travellers, we would point out that many Travellers in London have been forced into bricks and mortar against their will because of lack of adequate site provision and their needs should be included in any assessment of need. We therefore recommend that the maximum level of need identified in the London GTANA (16 additional pitches by 2017) is used as the baseline figure to inform the Site and Policies DPD.

We agree that the accommodation needs assessment should be reviewed on a 5-year rolling basis after this backlog of need is met.

While the Position Statement on Gypsy and Traveller accommodation does not set pitch targets and assumes the need for 4 public pitches will be met though site turn-over, it recognises the need to identify land for 2 pitches to meet the need of Traveller households who are current bricks and mortar homeowners. However, the document does not make a site allocation for this purpose, on the grounds that no suitable sites have been identified in the assessment against PPTS and Merton Core Strategy criteria. This site appraisal has not been published on the Council's website as part of the evidence base and therefore we are not convinced this approach is sufficiently justified. We would wish to request for this information to be made public as part of the Examination of the Sites and Policies Plan.

We are concerned that Merton has not made a site allocation because a) it holds the view that it is the responsibility of individual Gypsies and Travellers to bring forward sites and b) it considers Gypsy and Traveller needs are not a priority need because the group expressing the need is small in number.

We do not consider that Merton is in compliance with the Duty to Cooperate. Though Merton held discussions with neighbouring Boroughs through the sub-regional housing partnership, the Councils decided not to take a joint approach on the issue of Gypsies and Travellers. As a result, Merton has not shared with other Boroughs the data from their research concerning families in need who live outside of Merton and neither have other Boroughs shared data they may have collected concerning Merton residents.

At our meeting with Merton officers on 12 June 2013, they agreed to seek a meeting of the Gypsy and Traveller sub-group of the sub-regional housing partnership. As of the date of this representation, no feedback has been provided on when or whether the Gypsy and Traveller sub-group will convene.

Finally, we would like to attend the Examination in Public hearing session regarding Gypsy and Traveller provision in order to present evidence on this issue and participate in the debate.