

London Gypsies and Travellers

Brent Local Plan Consultation Response

5th December 2019

London Gypsies and Travellers

We wish to make the following comments related to *Policy BH9 Gypsy and Traveller accommodation*.

The West London Gypsy and Traveller Accommodation Needs Assessment has found:

There is a need for 86 additional pitches for households that did not meet the planning definition. This is made up of 23 concealed or doubled-up households or adults, 16 teenage children who will be in need of a pitch of their own in the next 5 years, 2 movement from bricks and mortar, 4 from in-migration and 41 from new household formation using a formation rate of 2.25% derived from the household demographics.¹

Clearly there is strong evidence of need arising from the site at Lynton Close, so the second part of the first sentence is not justified and we'd suggest it is removed: *'The existing Lynton Close travellers' site will be retained unless evidence shows it is no longer needed.'*

We strongly recommend that the policy sets a target to meet identified need (up to 90 pitches). The GTANA says:

The need for those households who did not meet the planning definition will need to be addressed through other means such as the SHMA or HEDNA and through separate Local Plan Policies as set out in the revised NPPF.

Regardless of what definition is used in the Local Plan for Gypsies and Travellers, there is clear evidence of need which can't be ignored. Therefore, Policy BH9 should set a target for up to 90 pitches and take an approach that seeks to meet this need.

We welcome the approach that accommodation for Gypsies and Travellers should be provided as part of Growth Areas and we recommend that provision should be sought as early as possible with a range of stakeholders. We would also recommend that the council identify a range of suitable sites for new provision.

In terms of the criteria for assessing new proposals we would urge the council to remove the following part of point *b) Be located on a site and in an area both environmentally*

¹ P.9 <https://www.brent.gov.uk/media/16411801/2018-10-26-west-london-gtaa-final-report.pdf>

acceptable for residential occupation and suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity; As it is, the criterion implies that Gypsies and Travellers' employment affects other residents.

We also strongly urge to council to take into account the temporary accommodation needs of Gypsies and Travellers who live roadside or are travelling through the Borough. Our recommended approach is set out in a recent report: **'The potential for a negotiated stopping approach in London'**².

We note that the GTANA does not identify transit need, however it recommends to all the local authorities who commissioned the study to explore negotiated stopping as an alternative solution for short-term accommodation. Our research report recommends that Local Plans are used as a mechanism to identify suitable locations for meanwhile use for temporary stopping in order for the local authority to be able to take a planned and managed approach to roadside camps, rather than resorting to evictions.

² <http://www.londongypsiesandtravellers.org.uk/news/2019/12/04/new-lgt-report-on-negotiated-stopping-in-london/>