

## **Representation on the Lewisham Site Allocations Local Plan (SALP) 'Schedule of Recommended Additional Modifications'**

### **London Gypsy and Traveller Unit**

We wish to make the following comments regarding the unsoundness of the SALP. This is due to the inadequacy of the consultation process and the document's lack of conformity with the National Planning Policy Framework and Planning Policy for Traveller Sites.

We would wish to take part in the SALP Examination in Public, which will allow us to make a full representation on these matters.

We agree with the Inspector's comments (October 2012) regarding the process for the Gypsy and Traveller site allocation. As acknowledged in the Council's paper on the background to the Gypsy and Traveller site search (May 2012), this process has been carried out unsuccessfully since the closure of the Thurston Road site.

Earlier this year, the Council commissioned a consultant to identify Gypsy and Traveller sites. This work is almost complete and the Council intends to come forward with a shortlist of potential Traveller sites in December 2012. We consider these sites must be incorporated into the SALP prior to the examination in January, in order to permit the SALP to be consistent with national policy

As it currently stands, the SALP fails to identify the required supply of land to meet the immediate and future needs of Gypsies and Travellers. The SALP Submission version with tracked modifications (September 2012) makes no reference to Gypsy and Traveller site allocations, indicating a severe lack of commitment to address the needs of the community. The removal of Appendix 3 from this version of the document (which refers to the deletion of the Church Lane Gypsy and Traveller site) is not sufficiently justified and raises an equality issue. For these reasons, the SALP as such is inconsistent with the Planning Policy for Traveller Sites and therefore unsound.

We do not consider that the Council has demonstrated it has fulfilled its Duty to Cooperate on the strategic issue of Gypsy and Traveller accommodation, as required by the NPPF (paragraphs 178-181) and PPTS (paragraph 9). The PPTS Compatibility Self Assessment (May 2012) only points to the 2008 London GTANA as evidence for collaboration with other Boroughs. This may be acceptable in terms of the requirement to produce an accommodation needs assessment, but it does not address the issue of site identification. Furthermore, the above mentioned paragraphs from the NPPF describe the Duty to Cooperate as an active, effective and continuous engagement process, whereas the GTANA was conducted 4 years ago and was collaborative only in the sense that all the Boroughs agreed to undertake it.

Furthermore, paragraph 6 of PPTS explicitly requires co-operation and effective engagement by the Council with traveller communities and their support organisations. Lewisham has not met this requirement, a further indicator of unsoundness. The details are as follows:-

No attempt was made by Lewisham to inform LGTU of the consultation on the SALP, despite very full representations made by them on the Core strategy and participation at the EiP. We attach all those representations and documents. Brenda Downes, who is a Traveller officer at the Lewisham Irish Centre and took part in the Core Strategy EiP has not been contacted throughout the consultation period, although she tried to engage with the Planning department regarding land searches. The Lewisham Traveller Forum has been postponed on 3 occasions by Lewisham officers.

We have a very different interpretation of the lengthy story of Lewisham's failure to comply with the requirement to find land to replace the 16 pitches at Thurston Rd, let alone the additional pitches identified as needed by the London GTANA. Lewisham's approach to the needs of their Traveller residents is characterized by inaction and a lack of transparency.

These are the brief points we would like to make.

- The 5 pitch Church Lane site would have made only a small contribution towards the identified need but it would have been a start. In the SALP they give no explanation on why it is not suitable.
- The Church Lane site had gone through all due processes and every survey imaginable and had been granted planning permission.
- Lewisham had been provided with an HCA grant to build the site. Is this funding still available?
- Some local residents have sustained very vocal objections which were turned down at judicial review, then revived when the plan was re-activated, based on ill-founded claims that there would be constant movement of caravans on and off the site. LGTU and the Traveller officer at the Lewisham Irish centre, clarified with Lewisham officers that this was entirely not the case on permanent sites-Travellers lucky enough to get a pitch aren't in the position to move on. In any event Lewisham would have been fully aware of this from their previous site on Thurston Rd.
- There may be reasons we have not been made aware of, but it appears to us that Traveller sites are not being identified in Lewisham because they are unpopular with the majority of the electorate. No valid reason has been given to exclude Traveller sites from the SALP.
- We have major concerns about Lewisham's commitment to build a Travellers site and their failure to protect their Traveller residents and those who represent them from apparently hostile attitudes. This raises issues of equality of treatment. The main reason that residents from Thurston Rd gradually began to sell off their licences to the council was fear of how they would be treated on the relocated site. A local councilor who supported the need to build a Traveller site at Church Lane had a complaint made against him.
- Despite continuous requests to open a site waiting list which is the clearest way to demonstrate need there have been barriers and confusion on how Travellers can put their name down and what status the list has. There is no named contact in the Housing Department or a written procedure regarding this issue.

We are a small under-resourced community organization, trying to monitor the plans of 32 London boroughs with no public money to support this work and

fully expect to be contacted as a consultee by those boroughs where we have been previous participants in their planning process, and would like clarification on why this has not happened. This failure to consult has left us with little time to adequately respond.

Brenda Downes, the Traveller officer at the Lewisham Irish Centre did not have time to put in an individual submission on the SALP, but she supports our comments.

Ilinca Diaconescu  
London Gypsy and Traveller Unit  
12 November 2012