**Borough comments on London GTANA and RRR’s responses, 24.4.24**

| **Comment** | **Theme** | **Notes** | **Response** |
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| 1. | Suitability of findings for use in local plans | * Assumption that it is the intention for this work to be suitable for Local Plan examination assessments and the methodology is viewed by the GLA/yourselves as robust for this purpose.
 | * Yes, the GTANA will provide evidence and information to inform Local Plan making, which will be considered alongside other evidence that the local planning authority may have.
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| 2. | Cultural Preference | 1. “Cultural need” would be more appropriate than “Cultural preference”, as it could be interpreted as meaning that the preferred accommodation for the GTANA Community is to live on pitches, rather than bricks and mortar housing and this may not be the case in many instances.
2. Clarify whether “Cultural Preference” meets the PPTS definition
 | Response to point 1:* Whilst ‘cultural need’ might appear appropriate because the GTANA assesses accommodation need rather than demand, ‘cultural preference’ is the term RRR, the GTANA Steering Group and GLA agreed. This was partly because the term ‘cultural preference’ is used in DCLG's 2016 draft guidance on assessing the need for caravans and households. Therefore, there is some existing government-level acceptance of the term.
* The GTANA identifies a need for bricks and mortar accommodation for Gypsy and Traveller households. However, it doesn’t assume all households have a cultural preference to live on a site, as the methodology draws on specific responses to specific survey questions to determine cultural preference.

Response to point 2:* The PPTS definition relates to *whose* need is assessed not *how* need should be assessed. The PPTS itself provides little detail on how need should be assessed. Government guidance published in 2007 (now withdrawn) referred to “bricks and mortar dwelling households whose existing accommodation is overcrowded or unsuitable… by virtue of proven psychological aversion to bricks and mortar accommodation”, whereas more recent (2016) draft guidance referred to “unsuitability by virtue of a person’s cultural preference not to live in bricks-and-mortar accommodation.” This change in approach/terminology was a factor in the Steering Group’s and the GLA’s decision that the GTANA should use cultural preference, rather than psychological aversion, as a factor in calculating need.
* The London GTANA uses cultural preference in assessing the needs both of those who meet the PPTS definition and those who meet the cultural definition.
* There is no indication that doing so is inconsistent with the PPTS.
* Indeed, paragraph 3 of PPTS states “The government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.” We consider that identifying the accommodation needs of Gypsies and Travellers residing in bricks and mortar who need to move and prefer to reside on a pitch is a prerequisite for fair and equal treatment.
* Households were identified as having a cultural preference for living on a pitch if they gave the responses specified below to all of the following questions:
* A6. Why do you live in a house/flat rather than a caravan? (response categories: ‘due to a lack of sites’, ‘no choice’ or both) (82%). (This question is important as it determines the proportion of households who prefer to reside on a site but are unable to do so.) AND
* E6. ‘Do you need to move to a different home within the next 5 years?’ (response category: ‘yes’) (32%). (This question is central to determining households’ need to move within the first five-year period covered by the GTANA.) AND
* E8. What type of accommodation would you most prefer to move to? (response categories: ‘Council/social rented site’, ‘Private site owned by self’, or ‘Private rented site’ (74%). (Responses to this question are central to determining the proportion of households who would prefer to live on a site.)
* We estimate that 19% of households that meet the cultural definition and 16% who meet the PPTS definition, and need to move, have a cultural preference to live on a pitch.
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| 3. | Cultural v PPTS 2023 | * Clarification of the relationship between the cultural and PPTS 2023 definition.
 | * The ‘cultural’ accommodation needs figure is broader than the PPTS 2023 figure in that it determines the accommodation needs of all Gypsy and Traveller households, whether they have ceased to travel or not due to health or education reasons or old age or any other reason.
* The accommodation needs of households that meet the PPTS definition are set out separately in the report, but all of those households are also assessed as being in need where the ‘cultural’ definition is applied. So, households in need who meet the PPTS definition are a subset of households in need who meet the cultural definition.
* It is important to note that PPTS 2023 still differentiates between households based on their travelling patterns. The PPTS 2023 definition only includes households who are travelling, or have previously travelled and have stopped doing so. Further, it only includes households who have stopped travelling for reasons of health, education or old age. There are other reasons for which households may have stopped travelling. The cultural definition (i.e., the draft London Plan definition) includes those who meet the PPTS 2023 definition and those who do not - i.e., all households who identify as members of the GRT communities.
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| 4. | Showpeople | * The assessment should reflect the guild’s own advice regarding the size of plots.
 | * The GTANA does not determine appropriate plot sizes, although reference can be made to the Guild’s (2007) guidance on designing yards.
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| 5. | Local Plan periods | * An approach to project the need forward to the end of the Local Plan period 2038/39 would be welcomed.
* Can need figures go beyond 10 years – for all cohorts?
 | * The London GTANA covers a period of 10 years as this was what the project brief specified. Where needs figures are calculated for a longer period, they may be less reliable.
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| 6. | Projections of population change used for calculating need in the second five-year period | * Clarify that projections are based on the characteristics of the collective population of *all*the sites across London included in the survey, *rather than* the characteristics of the population of any individual site, or the sites in any individual borough.
* Further clarification of steps used to calculate projections beyond first five years.
 | * Yes, the population growth projections are based on the survey responses from, and characteristics of, all households surveyed across London, including those on sites and those in bricks and mortar accommodation, rather than the population characteristics of any individual site or sites.
* The GRTTS population in each London borough varies widely. As some boroughs’ GRTTS populations are small, and response rates to surveys conducted for the GTANA are low in some boroughs, it is not possible to accurately determine projected need during the second five-year period using only borough level data. A London-wide approach, based on a much larger combined population, provides more robust and reliable figures.
* Accommodation needs arising from Gypsy and Traveller households residing in bricks and mortar accommodation and Roma households were determined using household surveys.
* The GTANA calculates accommodation needs for the second five-year period by applying a population growth figure, which is based on analysis of factors derived from the household surveys conducted for the 2023 GTANA. These factors include current population numbers, the average number of children per household, and household formation rates. Survey responses indicate an annual household growth rate of 3% per annum (compound), equating to a five-year rate of 15.9%. They also indicate a mortality rate of 2.3% over each five-year period. Combining these two figures yields a net population growth rate of 13.6%. Basing population growth figures on survey responses leads to a robust and reliable population projection for the second five-year period. It is important to note that the population growth figure of 13.6% is applied to the number of Gyspy and Traveller households estimated to be residing on pitches, and the number of Gypsy and Traveller, and Roma, households residing in bricks and mortar accommodation at the end of the first five-year period borough individually, resulting in a borough-specific needs figure for the second five-year period.
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| 7. | Waiting lists and need | * Concerned regarding applying a London wide calculation – as Wandsworth doesn’t have a waiting list as no demand for the site.
* Further clarification needed about how accurate a London wide basis calculation is to predict housing needs specific to London Borough of Barnet.
 | * We do not consider the absence of a waiting list for pitches an adequate basis for concluding that there is no need for them. We did not use waiting list data for two reasons. First, waiting lists can overestimate actual need, as they may include duplicate applications, applicants who have found housing since applying but haven't withdrawn their application, or those who are seeking to improve their current housing situation rather than being in need. Second, waiting lists might not fully capture demand for social housing. Some individuals or families in need may not apply, due to the perceived long wait times, lack of knowledge about the application process, and actual or perceived restrictions on access to housing needs registers.

Please refer to our response to comment six regarding the London-wide population calculations. |
| 8. | Bricks and Mortar and Roma | * Further clarification of the steps used to calculate the need for bricks and mortar need for G&T and Roma in the first five-year period.
* Re bricks and mortar need - answer noted and ask that in the final version of the GTANA it is made clear that these types of need will form part of the GLA housing targets.
* Has the need for bricks and mortar housing for the GTANA community been fully calculated separately to the general housing need?
* Roma need: See comments within response dated 6.11.2023 which applies the correct household size more common for Roma households.
* Bricks and Mortar Accommodation Needs: - Roma and G&T should be one – avoid double counting
 | * The steps used to calculate accommodation needs arising from Gypsy and Traveller households residing in bricks and mortar accommodation and Roma households for the first five-year period are in the borough information sheets already provided and provided, with additions, alongside this document.
* Yes, need for bricks and mortar housing for the GRTTS communities was calculated separately from need for the general population. The GLA aims to ensure that the next London Strategic Housing Market Assessment (SHMA) acknowledges the need for bricks and mortar housing from Gypsies and Travellers and Roma, as determined by the GTANA. This point will be made clear in the final version of the GTANA.
* Roma need: Household characteristics, including the number of persons in each household, were determined using responses to household surveys. (It is recognised that Gypsy and Traveller households tend to be larger compared with the general population, which means that they may require larger homes on average than the settled community.) There were 729 responses to the Roma household survey and 500 responses to the Gypsies and Travellers residing in bricks and mortar accommodation survey. (For numbers of responses and percentage response rates per borough, see respective borough’s revised information sheet.) As such, responses provide the basis for a good understanding of household characteristics.
* The Gypsy and Traveller, and Roma, communities have distinct social and cultural characteristics, for example, the nomadic habit of life of Gypsies and Travellers, which may impact on accommodation needs. This is why the GTANA used two different household surveys to determine the accommodation needs of these cohorts.
* As the household surveys began by asking survey respondents whether they, or another household member, had already completed the survey, and as only one survey for each household was undertaken, we are confident that double-counting has not occurred.
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| 9. | Survey response rates | * Need number of households who responded as well as percentage.
 | * Number of households who responded as well as percentage response rates, are provided in the revised summary documents for individual boroughs that accompany this document.
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| 10. | Clarification of categories | * Overcrowding and doubling up on sites: - requiring clarification
* Need for pitches arising from households living in bricks and mortar– require further clarification.
* Further clarification within the report regarding the general needs and wishes of the different cohorts.
* Also, cultural differences in household sizes - i.e., that Gypsy and Traveller, and Roma households, tend to be larger than households in the settled community - should also be taken into account.
 | * The number of overcrowded households (including concealed and ‘doubled up’ households) was determined using responses to the household surveys.
* Accommodation needs resulting from overcrowding for households residing in bricks and mortar homes are partly determined by comparing the number, sex, age, and partnership status of household members with the ‘bedroom standard’.
* We determined households residing on pitches were overcrowded in two ways: first, we identified that there were not enough bedroom spaces to accommodate all household members; second, overcrowding can occur if more caravans are situated on a pitch than it is designed to accommodate. ‘Doubled-up’ households - i.e., multiple households sharing a single pitch that is typically designed for one household - were determined using the household survey.
* In relation to need for pitches arising from those living in bricks and mortar, please see our response about ‘cultural preference’ in comment two.
* Please refer to our response in comment eight regarding the GTANA acknowledging that GRTTS communities may require larger homes on average than the settled community.
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| 11. | Meeting need | * Areas do not have reserves of land / space of a size or kind suitable for use for this type of accommodation and it is unlikely that there will be any suitable sites available in the future.
* The final report should reference the unique difficulties of some local authorities, particularly those in inner London, to adequately address the findings of this assessment given their constraints
* How has affordability been factored in when it comes to the delivery of bricks and mortar accommodation?
* What are the funding streams GLA has available, and would it be sufficient to deliver the housing needs targets?
* It would be also welcomed to have a section addressing how the specific findings should then be used for the future plan making process
 | * We appreciate that there are significant constraints regarding the provision of new sites in London, including limited funding and a lack of affordable land. (This was highlighted in the stakeholder consultation undertaken as part of the GTANA.) However, the key aim of the GTANA is to determine accommodation needs, whilst the GLA and London boroughs will consider policy responses. Matters such as site optimisation, funding challenges and resource capacity, though important, lie largely outside the scope of this GTANA.
* We will consider the extent to which Chapter 10 (the concluding chapter of the report) might pick up on some of this, at a high level, such as by referring to Mayoral funding that is available, through the Mayor’s 2021-26 Affordable Homes Programme, for developing and refurbishing GRTTS sites.
* We did not ask about income in surveys, because our experience has shown us that this results in low response rates. This assessment focuses on the extent of accommodation need, but also provides insight into other factors including the affordability of bricks and mortar homes. For example, the Roma household survey asked about housing affordability and other costs such as heating and electricity. The household survey also asked about the preferred tenure of households who stated that they need to move – over half (54%) of households stating that they need to move would prefer to rent from a local authority or housing association.
* The GLA has confirmed that funding from the Mayor's Affordable Housing Programme (AHP) is available for developing new sites and refurbishing existing ones. It may be useful for you to contact the GLA to discuss this further (after the Mayoral election). It is also important to note that some households want to and can afford to develop their own private sites.
* The final chapter will discuss some potential ways of addressing needs. The GTANA cannot be prescriptive as the GTANA is an evidence rather than policy document. Once published, the GTANA can, and would be expected to, be used to inform future policy and plan-making by both the GLA and boroughs, alongside their own local evidence.
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| 12 | Local Plans and the GTANA | * The finalised GTANA should state what are the implications for Local Plans which are in development in parallel to the GTANA production and how it is to be considered during Local Plan production.
* It would be beneficial for the GLA to consider this when commenting on these plans either during regulation 19 or during examination and find a pathway forwards to ensure that G&T housing need does not become an issue which asserts Local Plan’s are unsound. It would be even more beneficial if such a framework was included in the final GTANA.
 | * We appreciate that boroughs are progressing their Local Plans at the same time that the GTANA is being produced. However, the GTANA is a standalone, evidence document and how its findings should be used are for the GLA and boroughs to consider.
* See also the second paragraph of our response to comment 11.
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