

H10: Gypsy and Traveller Accommodation

Topic Paper

LB Newham (2025)

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1. Introduction

- 1.1 This topic paper has been prepared in response to representations received in response to Newham's Regulation 19 consultation (held between July and September 2024) on Policy H10 (H10: Gypsy and Traveller accommodation) in Newham's Draft Submission Local Plan (2025).
- 1.2 In response to the consultation, Newham received comments citing concerns with the policy approach in policy H10 from the Greater London Authority and London Gypsies and Travellers. These concerns can be summarised as follows:
- London Gypsies and Travellers and the Greater London Authority (GLA) raised the need to include a target for the delivery of 23 pitches, as per the need identified in Newham's Gypsy and Traveller accommodation assessment. This target should be chronological, with London Gypsies and Travellers recommending 2026 as a target for expanding Newham's existing site, 2027 for delivering a new site with some 10 pitches, and 2030 for delivering a second new site.
 - London Gypsies and Travellers requested that the Local Plan include provisions for delivering and assessing transit and negotiated stopping sites in the borough.
 - Alongside their comments on Policy H10, London Gypsies and Travellers recommended amendments to Policies H1 (Meeting Housing Needs), H3 (Affordable Housing) and H4 (Housing Mix), to reflect the Gypsy and Traveller community's rights to culturally appropriate adequate housing. The amendments suggested included:
 - Including culturally appropriate housing for Gypsies and Travellers with nomadic heritage in reference to delivering small sites in the borough;
 - Referring to the needs to secure social and affordable accommodation that is culturally appropriate; and
 - Referring to Newham's Gypsy and Traveller Accommodation Assessment in the housing mix policy.
- 1.3 This paper aims to:
- Set out the policy and legal context around the delivery of Gypsy and Traveller accommodation;
 - Set out the need for Gypsy and Traveller accommodation in Newham;
 - How we have approached identifying sites for Gypsy and Traveller accommodation; and
 - Present the justification for the policy approach in Newham's Submission Local Plan.

2. Identifying need for Gypsy and Traveller accommodation in Newham: Policy context, legal context and needs assessments in Newham

2.1 National and regional policy context

- 2.1.1 The National Planning Policy Framework (NPPF) (2023), the Planning Policy for Traveller Sites (PPTS) and the London Plan (2021) set out the national and regional policy context for plan-making and assessing applications for Gypsy and Traveller sites. These set out high level parameters that guide where new housing and pitch provision should be located. In particular, national and regional policy requirements around green belt, metropolitan open land and flood risk limit where new permanent pitch provision can be brought forward.
- 2.1.2 A short summary of these considerations that inform locational requirements for assessing a piece of land's suitability for new Gypsy and Traveller pitches is provided below:
- Flood Risk: The NPPF seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk (whether existing or future). The Planning Practice Guidance sets out that uses classed as highly vulnerable, which includes caravans, mobile homes and park homes intended for permanent residential use, should not be provided in Flood zones 3a and 3b and should meet an exceptions test in Flood Zone 2. Sites used for short-let caravans, subject to a specific warning and evacuation plan, are subject to an exception test in Flood Zone 3a and not permitted in Flood Zone 3b.
 - Green Belt: The NPPF seeks to avoid inappropriate development that is harmful to the Green Belt and will not be approved except in very special circumstances. Newham currently contains a very limited area of greenbelt at City of London Cemetery & Crematorium and Wanstead Flats.
 - Metropolitan Open Land: the London Plan (2021) affords Metropolitan Open Land the same status and level of protection as Green Belt.

2.2.2 These policy requirements have informed Policy H10.

2.2 Policy and Legislative Context prior to 2022

- 2.2.1 The policy and legislative context for identifying sites for Gypsies and Travellers has changed significantly since Newham began its refresh of the Local Plan.
- 2.2.2 At the start of the plan-making process, the planning definition for Gypsies and Travellers was set out in the 2015 Planning Policy for Traveller Sites (PPTS). It covered "Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily". Notably, this planning

definition excluded those members of the Gypsy and Traveller community who had ceased to travel permanently.

2.3 Court of appeal ruling

- 2.3.1 In 2022, the Court of Appeal found the 2015 Planning Policy for Traveller Sites definition to be unlawfully discriminatory (Smith v Secretary of State for Levelling Up, Housing & Communities & Anor). Consequently, in December 2023 and December 2024 the Government updated the Planning Policy for Traveller Sites definitions in line with the 2022 Court of Appeal ruling as follows:

“For the purposes of this planning policy “gypsies and travellers” means: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

2.4 Newham’s Gypsy and Traveller Accommodation Assessment (2022)

- 2.4.1 It was Newham’s view that the 2015 PPTS definition was discriminatory and therefore, in advance of the high court ruling, Newham undertook a Gypsy and Traveller Accommodation Assessment (LBN GTAA) that gathered evidence on the need of Gypsies and Travellers in Newham who both met and fell outside of the 2015 planning definition. This study, published in 2022, found that there was no need for new pitches for households that met the 2015 PPTS definition. However, the study identified a need for 23 pitches for households that did not meet the 2015 Planning Policy for Traveller Sites definition. This need breaks down as follows:

Figure 16 – Need for Gypsy and Traveller households in Newham that did not meet the PPTS planning definition by year periods

Years	0-5	6-10	11-15	16	Total
	2022-27	2027-32	2032-37	2037-38	
	15	2	2	4	23

- 2.4.2 No accommodation need was identified for Travelling Showpeople households. The study also recommended that a review of the evidence base relating to unauthorised encampments should be undertaken on a London-wide basis, to establish whether there is a need for investment in any new transit provision or emergency stopping places across London.

2.5 Greater London Authority’s emerging Gypsy and Traveller Accommodation Needs Assessment

- 2.5.1 In 2022 the Greater London Authority (GLA) commissioned RRR Consultancy Ltd to undertake a London-wide Gypsy and Traveller Accommodation Needs Assessment

(GTANA). The study will determine the accommodation needs of the Gypsy, Traveller and Roma (GRT) communities residing on sites and yards, and in conventional accommodation, for the period 2022-2032.

- 2.5.2 Newham has participated in engagement with the GLA around the preparation of the London GTANA. The study is yet to be finalised, but we anticipate Newham's need figure will increase as a result of the study, which involved extensive engagement with Gypsy and Traveller communities across London. We are supportive of the proposed methodology and consider it important for boroughs to have an accurate picture as possible of need. Taking into consideration the emerging London-wide study is reflected in the monitoring criteria for the Submission Local Plan.

3. Meeting need: Identifying sites for Gypsy and Traveller accommodation

3.1 Approach to identifying sites through Local Plan Review: Issues and Options, Call for Sites and Regulation 18

- 3.1.1 The Planning Team undertook a Call for Sites in 2021, allowing individuals and organisations the opportunity to let the Council know about land or buildings in the borough that could be redeveloped between now and 2038. As part of the call for sites we reached out to colleagues within the Council to identify any sites they may wish to bring forward across the emerging plan period and for which uses. We also contacted all groups and people on our consultation database, including London Gypsies and Travellers, an organisation who advocates for Gypsy and Traveller communities in London, contributing to the development of local, regional and national policy.
- 3.1.2 During this exercise, no sites were submitted for Gypsy and Traveller pitches. However, during previous attendance at the London Gypsy and Traveller forum, members of Newham's Gypsy and Traveller community had identified an area to the south of Parkway Crescent (the only existing Gypsy and Traveller site in the borough) as suitable for a site extension. The Regulation 18 Draft Local Plan therefore safeguarded the existing Parkway Crescent site including this small extension for Gypsy and Traveller pitches.

3.2 Approach to identifying sites through Local Plan Review: Regulation 19 development

- 3.2.1 At the time of the 2022 Court of Appeal ruling and 2023 Planning Policy for Traveller Sites update, Newham had just received approval to consult on the first draft of the Local Plan (the Regulation 18 consultation). Therefore, the Regulation 18 version of the Local Plan did not include any allocations for Gypsy and Traveller pitches (other than the extension to Parkway Crescent), noting that no need had been identified under the former 2015 PPTS definition.

- 3.2.2 Following the update to the PPTS definition in 2023, Newham reviewed our identified site allocations in the Regulation 19 Submission Draft Local Plan to see whether any would be suitable, available or achievable for pitch delivery.
- 3.2.3 Newham officers also met with officers from LB Islington, to discuss their recent experience of examination in the context of this new judgement and whether there was scope to consider a broader range of sites (including privately owned land) for Gypsy and Traveller accommodation pitches. During this discussion LB Islington suggested that their Inspector continued to place significant weight on sites needing to be available for this land use i.e. landowners needed to have intentions to develop the site for pitches.¹ This is reflected in Islington's Local Plan Inspector's Report, which sets out the following:

“At the hearings, the Council were asked to seek to meet such needs and undertook further site assessment work (Ref: SD83 and SD84). After an extensive search, this identified three sites that the Council considered could deliver gypsy and traveller pitches. The three sites were included in the MM consultation, as proposed allocations GT1, GT2 and GT3. Following the MM consultation responses and for the reasons set out in our previous letter (Ref: INS18) we are unable to find each of the proposed allocations sound. We have therefore removed them from the MM schedules as well as the associated text changes.”

- 3.2.4 Letter INS18 (referenced above)², discounted each of the proposed sites based on:
- the current landowners having no intentions to redevelop or dispose of the site (therefore each site being considered neither available or deliverable); and
 - amenity issues due to potential adverse noise and vibration from a nearby railway line.
- 3.2.5 Similar concerns in relation to availability of sites is set out in the London Borough of Croydon's [Assessment and selection of sites for Gypsy and Travellers](#), published in July 2016. While this assessment was produced in the context of the 2015 PPTS, it highlighted major issues with site deliverability where sites were in private ownership.
- 3.2.6 This context informed our assessment of sites at Regulation 19 stage, discussed below.

3.3 Approach to identifying sites: Large sites (>0.25 hectares)

- 3.3.1 Newham's approach to identifying site allocations is set out in the Site Allocation and Housing Trajectory Methodology Note.

¹ Referenced in the [Newham Draft Submission Local Plan Duty to Cooperate Statement](#) (2024) at paragraph 4.46

² nrpfnetwork.org.uk [Planning Inspectors letter INS18 to Islington Council](#) (2023)

- 3.3.2 As set out above (see 'Local Plan Review: Issues and Options to Regulation 18'), Newham undertook a Call for Sites exercise in 2021. In response to this exercise, no sites for pitch delivery were received.
- 3.3.3 During the call for sites, all sites were subject to an initial sifting, to determine whether the site was:
- Suitable: A site would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.
 - Available: Is the site considered available for development during the plan period? Do we have information that the landowner has intentions to develop the site? Are there any known land ownership or legal issues that would prevent the site from coming forward?
 - Achievable: Is there a reasonable prospect the site will be developed during the plan period, taking account any viability issues and the capacity of the landowner to bring forward and develop the site?
- 3.3.4 At the time of drafting the Regulation 18 Draft Local Plan, the Council was unable to require the delivery of Gypsy and Traveller pitches on privately owned sites given that our identified need for pitches fell outside of the Planning Policy for Traveller Sites 2015 definition.
- 3.3.5 Following the 2015 definition being quashed, we reviewed our identified site allocations in the Regulation 19 Submission Draft Local Plan to see whether any would be suitable, available or achievable for pitch delivery. These were sites that were identified as being suitable, available and achievable for general needs housing, and taken forward as site allocations during the preparation of the Regulation 18 Local Plan.³
- 3.3.6 In order to assess suitability, availability and achievability of these sites for pitch delivery the following considerations were made:
- Suitability: As per the NPPF requirements (see paragraph 2.1.2), sites fully in Flood Zone 3 were immediately discounted, noting that these uses (caravans, mobile homes and park homes intended for permanent residential use) are classed as highly vulnerable under the National Planning Policy Framework, and therefore not considered acceptable in Flood Zone 3. These sites have not been included in Table 1 below.
 - Availability: Determining whether sites were available was informed through the approaches taken by LB Islington and LB Croydon, as referenced in section 3.2 above. This meant that sites weren't considered to be available and deliverable where there was no indicated interest in delivering pitches from the landowner.
 - Achievability: All sites were considered achievable, noting they had been allocated in the Regulation 18 Draft Local Plan.
- 3.3.7 A summary of this assessment is provided below:

³ Two new site allocations – Alpine Way and Excel Western Entrance – were also identified as site allocations between Regulation 18 and Regulation 19. These are also considered in the table of site allocations below.

Table 1: Assessment of sites suitability, availability and achievability for pitch delivery

	Suitable	Available	Achievable
Silvertown Quays	Only small areas are located outside flood zone 3	No – approved planning permission with no pitch provision. Landowner (GLA) has expressed no intent to deliver pitches on the site.	Yes
Thameside West	Only small areas are located outside flood zone 3	No – approved planning permission with no pitch provision. Landowner (GLA) has expressed no intent to deliver pitches on the site.	Yes
Limmo	Around half the site is outside flood zone 3.	No – Landowner (TFL) has expressed no intent to deliver pitches on the site.	Yes
Custom House - Coolfin Road Council Regeneration Project	Only small area is located outside flood zone 3	No – Council-owned Regeneration site. Area outside flood zone 3 is a school campus. Were this area to be redeveloped it would likely need to re-provide the campus facilities. Wider regeneration programme seeks to deliver retrofit of existing buildings where feasible, leaving a smaller area of land to re-provide housing for existing residents, alongside other infrastructure needs. Likely to be a highly constrained site. Masterplan not yet formulated, and will require residential ballot.	Yes
Custom House - Land between Russell Road and Maplin Road Council Regeneration Project	Around half the site is outside flood zone 3.	No – Council-owned Regeneration site with planning permission. Wider regeneration programme seeks to deliver retrofit of existing buildings where feasible, leaving a smaller area of land to re-provide housing for existing residents, alongside other infrastructure needs. Likely to be a highly constrained site. Masterplan not yet formulated, and will require residential ballot.	Yes
Royal Albert North	Around a third of the site is outside flood zone 3.	No – Landowner (GLA) has expressed no intent to deliver pitches on the site.	Yes
Royal Road	Majority of the site is outside flood zone 3	No – Council owned school site. Approved planning permission with no pitch provision.	Yes
Canning Town Riverside	Majority of the site is outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes

Abbey Mills	Majority of the site is outside flood zone 3	No – Site is highly contaminated and is likely to have a significant impact on site viability. Landowner has expressed no intent to deliver pitches on the site.	Yes
Twelvetreestrees Park and Former Bromley By Bow Gasworks	Majority of the site is outside flood zone 3	No – Around half of the site subject to an approved planning permission with no pitch provision. Landowner has expressed no intent to deliver pitches on the wider site.	Yes
Sugar House Island	Around half of the site is outside flood zone 3	No – approved planning permission with no pitch provision. Landowner has expressed no intent to deliver pitches on the site.	Yes
Stratford Central	Majority of the site is outside flood zone 3	No – majority of the site is existing development, with smaller plots planned for redevelopment across the site. Landowners have expressed no intent to deliver pitches on the site.	Yes
Stratford Station	Around two-thirds of the site outside of flood zone 3.	No – large parts of the site are existing developments and railway infrastructure. Landowner has expressed no intent to deliver pitches on the site.	Yes
Stratford High Street Bingo Hall	Majority of the site outside of flood zone 3.	No - Landowner has expressed no intent to deliver pitches on the site.	Yes
Stratford Town Centre West	Majority of the site outside of flood zone 3.	No – majority of the site is existing development, with smaller plots planned for redevelopment across the site. The landowners have expressed no intent to deliver pitches on the site.	Yes
Stratford Waterfront South	Around half of the site outside of flood zone 3.	No – approved planning permission with no pitch provision. Landowner has expressed no intent to deliver pitches on the site.	Yes
Rick Roberts Way Council Regeneration Project	Around half of the site outside of flood zone 3.	No – Council-owned Regeneration site. It is part of an agreed portfolio approach to sites, which requires the delivery of significant levels of affordable housing and open space. Likely to be a highly constrained site.	Yes
Bridgewater Road	Majority of the site outside of flood zone 3.	No – approved planning permission with no pitch provision. Landowner has expressed no intent to deliver pitches on the site.	Yes
Chobham Farm North	Outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes

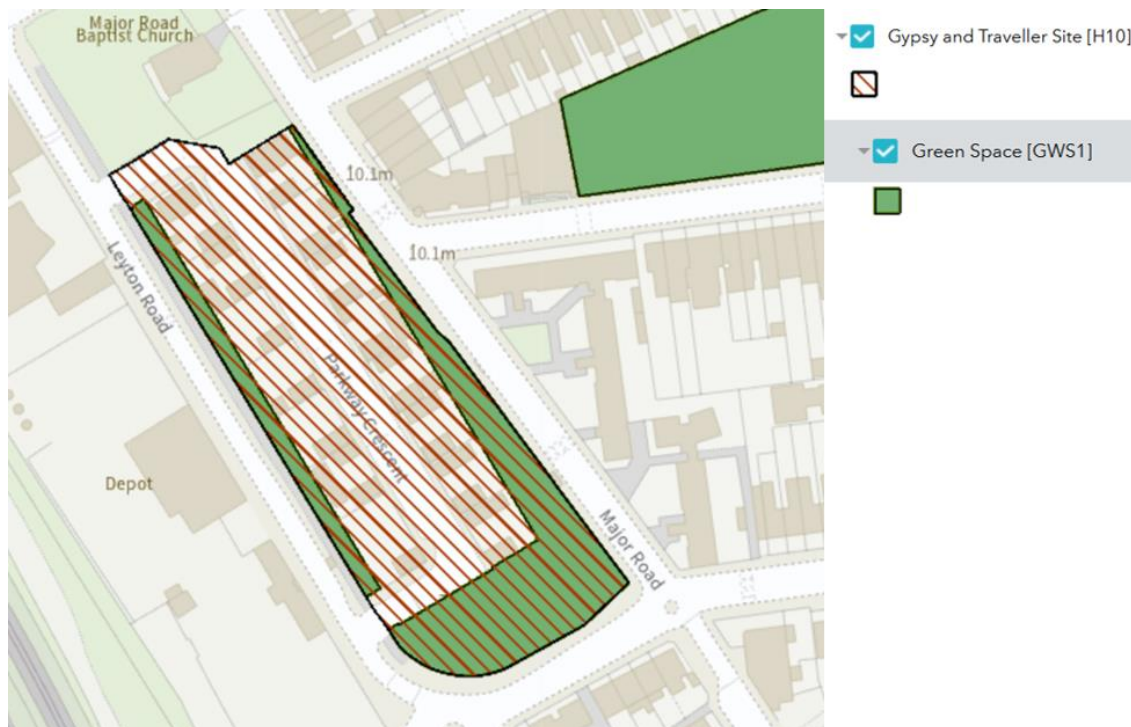
Plaistow North	Majority of the site outside of flood zone 3.	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
Balaam Leisure Centre	Majority of the site outside of flood zone 3.	No – Council-owned site. Required to re-provide the leisure centre off site before redevelopment to other uses can commence. Likely to significantly impact viability.	Yes
Newham 6th Form College	Outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
Newham Leisure Centre	Outside flood zone 3	No – Council owned site, with requirements to reconfigure the leisure centre, car park and open space. Likely to impact the viability of delivery significantly.	Yes
Balaam Street Health Complex	Outside flood zone 3	No – Needs to re-provide health centre on site, which would limit available land. Landowner has expressed no intent to deliver pitches on the site.	Yes
East Beckton Town Centre	Small areas outside of flood zone 3 – Gymnastics Centre, Beckton Globe, St Marks Community Centre and Health Centre	No – Parts of site Council owned, but if the site were to be redeveloped would need to re-provide a significant amount of community floorspace, which will restrict available land across the site and impact viability.	Yes
Alpine Way	Majority of the site outside of flood zone 3.	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
East Ham Western Gateway	Outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
East Ham Primark	Outside flood zone 3	No – Site needs to re-provide retail floorspace at ground floor, which is likely to take up a significant portion of the site's area. Landowner has expressed no intent to deliver pitches on the site.	Yes
Former East Ham Gasworks	Only small area is located outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
Shrewsbury Road Health Complex	Outside flood zone 3	No – Needs to re-provide health centre on site, which would limit available land. Landowner has expressed no intent to deliver pitches on the site.	Yes

Lord Lister Health Centre	Outside flood zone 3	No – Needs to re-provide health centre on site, which would limit available land. Landowner has expressed no intent to deliver pitches on the site.	Yes
Woodgrange Road West	Outside flood zone 3	No – Landowner has expressed no intent to deliver pitches on the site.	Yes
Beckton Riverside	Only small area is located outside flood zone 3	Uncertain – GLA have expressed an interest in delivering temporary transit pitches along Armada Way in areas within GLA ownership. However, this has not progressed for a significant period.	Yes

3.3.8 As shown through the table above, availability remained the key barrier to including pitch requirements within site allocations. While council-owned sites remain the most likely sites to be able to deliver pitches, in many instances these sites are required to deliver a range of infrastructure alongside residential uses, making it challenging to retain sufficient land on site to deliver ground-level pitches. None of the site allocations were therefore considered to have a high enough level of certainty to allocate for pitch delivery.

3.4 Approach to identifying sites: Parkway Crescent site extension

3.4.1 At present Newham contains one existing Gypsy and Traveller accommodation site at Parkway Crescent. The site contains 15 pitches. Members of Newham's Gypsy and Traveller community have previously identified an area to the south of the existing Parkway Crescent site as suitable for a site extension. This area has been safeguarded to allow for an extension to the existing site in the Submission Local Plan. The allocation has been proposed since the Regulation 18 draft Local Plan, and no objections have been received to its allocation. The allocation is shown below, with the land for the site extension located in the green space to the east and south of the site:



3.4.2 Our analysis of the site shows it can deliver two pitches for the local community and meet policy requirements to enhance the remaining greenspace. As this is a Council owned piece of land, it would be delivered by the Council. Given there is no allocated funding for these pitches at present, it is likely they would be delivered in the longer term phase of the plan period. However, the council is progressing feasibility of several of its small sites over the 2025- 2027 period, which includes Gypsy & Traveller accommodation as an assessed category. Therefore, the delivery of this site could be progressed as early as then.

3.5 Approach to identifying sites: Council owned small sites (<0.25ha)

3.5.1 Since 2023, the Council has been conducting a review of Council-owned assets, with the objective of making decisions on how best to use circa 300 sites to deliver Council objectives, such as for housing and community uses. A report on the programme was approved at cabinet in July 2023⁴, and an options appraisal exercise subsequently took place. The options appraisal put forward future recommendations for each of these sites, with both first and second options and a lead individual/team identified to take each recommendation forward. This appraisal process included considering whether sites were suitable for Gypsy and Traveller pitches. The criteria used for site assessment included a site being large enough to fit at least one berth plus landscaping, good access and suitably similar and/or complimentary street-scape. Through this sifting exercise, two sites were identified as a priority for delivering Gypsy and Traveller pitches.

3.5.2 These two sites were assessed further from a planning perspective; as a result one of these sites was fully discounted for being located in Flood Zone 3, which is not

⁴ [Agenda for Cabinet on Thursday 6th July 2023, 10.00 a.m.](#)

considered to be suitable for permanent pitch provision as per national policy and guidance.

- 3.5.3 Other sites were also identified as potentially suitable for pitches, albeit these were lower priority options (e.g., they were identified as a priority for general needs housing or community assets). There is still potential to develop these sites for pitches, particularly where the viability of delivering their priority uses remains challenging. However, this will be subject to individual business cases for delivery, noting the unprecedented financial challenges the borough is facing as a result of the high number of people in the Council being housed in temporary accommodation.
- 3.5.4 The council is progressing feasibility of several of its small sites over the 2025- 2027 period, which includes Gypsy & Traveller accommodation as an assessed category. The delivery of these sites could be progressed as early as then.

3.6 Approach to identifying sites: Sites suggested by members of Newham's Gypsy and Traveller community after the Regulation 19 consultation

- 3.6.1 Following the conclusion of the Regulation 19 Submission Draft Local Plan consultation, Newham met with London Gypsies and Travellers and local community members to discuss modifications to the Local Plan in light of their comments submitted during the consultation. In advance of this meeting, London Gypsies and Travellers raised additional sites that the local community considered as suitable sites for the delivery of pitches.
- 3.6.2 As these were submitted following the publication and conclusion of the Regulation 19 Submission Draft Local Plan consultation, we were unable to include them in our original site assessment or the Submission Local Plan. However, we have included an initial assessment of the sites below:

Table 2: Analysis of sites suggested by members of Newham's Gypsy and Traveller community

Site	Analysis
Plaistow North	Allocated under site allocation N9.SA1 Plaistow North (see above table under 'Large sites (>0.25 hectares)').
West Ham bus garage site	Allocated under site allocation N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks (see above table under 'Large sites (>0.25 hectares)').
Beckton Asda/allotments	Allocated under site allocation N11.SA1 East Beckton Town Centre (see above table under 'Large sites (>0.25 hectares)').
Beckton London industrial park	Allocated under site allocation N17.SA1 Beckton Riverside (see above table under 'Large sites (>0.25 hectares)').
Harberson Road, Stratford	Assets have confirmed this is in the Council owned small sites programme, and benefits from lottery funding for improvements. It is currently used as a community garden. This is being led by the Climate Action team.

3.7 Duty to Cooperate discussions with neighbouring boroughs on meeting Newham's need

- 3.7.1 Following the consultation on the Regulation 19 Local Plan, Newham sought to agree Statements of Common Ground (SOCG) with our neighbouring boroughs. In particular, we sought to outline our respective positions with regards to meeting Gypsy and Traveller accommodation needs, and whether neighbouring boroughs had any capacity to assist with meeting Newham's unmet need for permanent pitch provision. No boroughs were able to assist Newham with meeting our housing needs for pitch provision, and a summary of these discussions/agreements is provided below:

Table 3: Summary of Duty to Cooperate discussions with neighbouring boroughs

Duty to Co-operate Partner	Discussion / Agreements
Barking and Dagenham	<p>As the London Borough of Barking and Dagenham is currently unable to meet its own 5 year need for Gypsy and Traveller pitches, it is unable to share pitch capacity with the London Borough of Newham at this time.</p> <p>London Borough of Newham and London Borough of Barking and Dagenham agreed to continue to engage via local plan making processes, should circumstances change.</p>
Greenwich	<p>Within Royal Greenwich there are currently two safeguarded gypsy and traveller sites (one public and one private). They are both fully occupied, with limited capacity coming forward. As part of the Local Plan review, Royal Greenwich will be commissioning a new needs assessment, and will be looking to identify potential sites to meet its own identified need. There is therefore currently no capacity to take on Newham's additional need for gypsy and traveller accommodation.</p> <p>London Borough of Newham and Royal Borough of Greenwich agreed to continue to engage via local plan making processes, should circumstances change.</p>
Hackney	<p>Meeting held 17.10.24, but Hackney declined to participate in a Statement of Common Ground.</p> <p>Hackney at the meeting confirmed that they have no additional capacity to take LBN's need for Gypsy and Traveller Accommodation.</p>
Havering	<p>Havering has an identified the need for 225 pitches for Gypsy and Travellers and Travelling Showpeople to 2031, the sites have been allocated through the LB Havering Local Plan to meet this need. Therefore, there is no spare capacity. This</p>

	<p>need includes those who did not meet the former planning definition and undetermined households.</p> <p>London Borough of Newham and London Borough of Havering agreed to continue to engage via local plan making processes, should circumstances change.</p>
Redbridge	<p>Redbridge identified the need for 7 pitches in the current Local Plan and safeguards the existing Gypsy and Traveller site at Forest Road, which is a Council managed site, that provides 16 pitches. Redbridge plans to expand this site's capacity to provide this identified need for 7 pitches, however it is expected that there will be a need to look for more capacity and another site to meet the borough's need for gypsy and traveller accommodation. Therefore, there is no spare capacity to support Newham to meet our requirements.</p> <p>London Borough of Newham and London Borough of Redbridge agreed to continue to engage via local plan making processes, should circumstances change.</p>
Tower Hamlets	<p>Newham and Tower Hamlets recognise each other's need figures for Gypsy and Traveller accommodation, and agree there is currently no additional capacity to support each other's needs.</p> <p>London Borough of Newham and London Borough of Tower Hamlets agreed to continue to engage via local plan making processes, should circumstances change.</p> <p>London Borough of Newham and London Borough of Tower Hamlets agreed to continue to engage with the GLA as part of the development of a London-wide Gypsy and Traveller accommodation needs assessment.</p>
Waltham Forest	<p>Waltham Forest does not have additional sites capacity to take on any of Newham's need for Gypsies and Travellers accommodation.</p> <p>London Borough of Newham and London Borough of Waltham Forest agreed to continue to engage via local plan making processes on the overall delivery of sufficient Gypsy and Traveller accommodation in either borough, should circumstances change.</p>

3.8 Addressing need for Gypsy and Traveller pitches outside the Local Plan Process

- 3.8.1 In summary, we consider our approach to identifying sites through the Local Plan process is sound. While we have been able to allocate an extension to the boroughs' existing Gypsy and Traveller accommodation site, which allows space for the delivery of two new pitches, we have been unable to allocate further new sites as a result of deliverability challenges.
- 3.8.2 In addition, we have worked with colleagues in assets to highlight the importance of meeting this need through their small sites programme and have ensured a positively prepared policy which would enable delivery of these sites for pitches. New pitch delivery to meet need should primarily be led by our Housing and Assets teams, including as part of the next stage of the Council owned small sites project delivery. The policy wording of H10 sets clear parameters for the assessment of these applications as and when they are brought forward for consideration. The policy is as permissive as possible, reflecting only national and regional delivery constraints.
- 3.8.3 In the interim, the Council will continue to emphasise the role of the London Plan in helping to meet this strategic housing need. In responses to the London Plan consultation ([Towards a new London Plan](#)) and the Statement of Common Ground and associated Duty to Cooperate appendix, we have set out our view that the GLA should take a strategic lead on allocating land to meet any need identified in the emerging London-wide Gypsy and Traveller Accommodation Needs Assessment on a pan-London basis.

3.9 Meeting need: Summary on Soundness

- 3.9.1 In summary, we consider the approach within the plan to identifying land for Gypsy and Traveller pitches to be sound, as discussed below in relation to each of the tests of soundness:
- Positively prepared – while we have not been able to identify sufficient land to meet our needs figure, we have assessed whether site allocations would be suitable for pitch delivery and have separately identified one site to allow for the delivery of two pitches. We are also concurrently working with Newham's assets team to understand what available small sites there are in the borough to facilitate future pitch delivery. Policy H10 provides a clear and positive policy framework against which to assess applications that are brought forward during the plan period.
 - Justified – our approach is based on analysis of existing sites, and based on an assessment of these sites against whether they are suitable, available and achievable.
 - Effective – our key barrier to allocating new sites has been demonstrating that they are deliverable, given a lack of landowner interest in delivering pitches. Allocating sites without the certainty around deliverability would be a key soundness issue with the policy. As we cannot meet this need within our borough boundary, we have approached neighbouring boroughs to see

whether they can assist with meeting our needs; no boroughs have been able to help Newham in meeting its needs. This has been formalised in Statements of Common Ground with these boroughs.

- d. Consistent with national policy – we consider our approach accords with national policy, in accordance with the requirements set out in Section 2 of this topic paper.

3.9.2 Noting the comments received from London Gypsies and Travellers, discussed in section 1, we have proposed a modification that is considered to be minor to include reference to Newham’s Gypsy and Traveller Accommodation Assessment in the Plan’s housing need policy (H4). This is shown in the table below:

Table 4: Proposed modification to Policy H4 for the Inspector’s consideration

Policy wording	Policy part
[H4.1.b] evidence of housing need as set out in Newham’s latest Strategic Housing Market Assessment and in the Gypsy and Traveller Accommodation Assessment;	Policy H4.1.b

3.9.3 As per paragraph 1.2, London Gypsies and Travellers also included comments requesting amendments to the policy to include culturally appropriate housing for Gypsies and Travellers with nomadic heritage in reference to delivering small sites in the borough, and referring to the need to secure social and affordable accommodation that is culturally appropriate. We did not consider these amendments to be necessary for soundness. Our small sites policy allows for the delivery of a range of housing tenures and typologies, including pitches to meet the needs of Newham’s Gypsy and Traveller community. The plan’s affordable housing policy also seeks to prioritise the delivery of social rent homes above other affordable housing tenures. These would help to meet the needs of Newham residents, including members of the Gypsy and Traveller community in the borough.

4. Transit sites

- 4.1 In London Gypsies and Travellers comments on Policy H10, they raised concerns around the absence of provisions for a transit site and for negotiated stopping arrangements in the policy, noting this has the potential to push members of the Gypsy and Traveller community into the criminal justice system as a result of injunctions and lack of authorised stopping places. Further discussion with London Gypsies and Travellers has also indicated that they consider transit provision to be an effective and culturally appropriate housing provision for homeless members of the community requiring temporary accommodation.
- 4.2 While Section 3 discusses the challenges associated with identifying sites for the delivery of pitches, provision for transit sites may be a more viable opportunity for development where flood risk presents a challenge on a piece of land, as transit sites can meet less stringent flood risk requirements. This could be the case for sites in the

Council's small sites programme and the Greater London Authority have also expressed some interest in delivering a transit site in the borough on Armada Way (located on the Beckton Riverside site allocation), albeit this has not progressed for a significant period.

- 4.3 Noting the above concerns, we propose that the following wording amendments could help address this issue, and have therefore presented it for the inspectors' consideration below. Our consideration is this amendment could improve the clarity of the policy, by acknowledging the different policy requirements for permanent and transit accommodation and seeking to positively meet need through transit site provision.

Table 5: Proposed modification to Policy H10 for the Inspector's consideration

Policy wording	Policy part
<p>3. 1. The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller accommodation.</p> <p>4. 2. Developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches and transit sites and sites for negotiated stopping, will be supported where they meet identified need.</p> <p>5. 3. Developments that propose accommodation to meet these needs of Gypsies, Travellers and Travelling Showpeople should be located:</p> <p>a. outside of the Green Belt or Metropolitan Open Land, unless there are very special circumstances; and</p> <p>b. where they are providing permanent accommodation, in flood zone 1 or exceptionally in flood zone 2, subject to meeting the requirements of Local Plan Policy CE7; and</p> <p>c. where they are providing transit sites and sites for negotiated stopping, in flood zone 1, in flood zone 2 where a sequential test is passed, or exceptionally in flood zone 3, subject to meeting the requirements of Local Plan Policy CE7; and</p> <p>ed. on sites that can provide the associated necessary (primarily physical) infrastructure requirements to service the needs of a development or wider site; and</p> <p>ee. on land that provides safe access to the highway and should not result in any unacceptable impact on the capacity and environment of the highway network; and</p> <p>ef. the site is in a sustainable location, appropriate for residential development and in reasonable proximity to relevant services and facilities, including transport, education, healthcare and other relevant social infrastructure provision.</p> <p>6. 4. Developments that propose accommodation to meet the needs of Gypsies, Travellers and Travelling Showpeople should:</p>	Policy H10

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| <ul style="list-style-type: none"> a. provide an appropriately detailed management plan; and b. demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy, Traveller and Travelling Showpeople community. | |
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5. Monitoring

- 5.1 In response to the Regulation 19 consultation on the Draft Submission Local Plan, London Gypsies and Travellers raised concerns on the lack of a monitoring target for pitch delivery. They considered this should reflect the conclusions of the Newham Gypsy and Traveller Accommodation Assessment, which indicated a need for 23 pitches across the plan period. They also recommended the target should be chronological, recommending 2026 as a target for expanding Newham's existing site, 2027 for delivering a new site with some 10 pitches, and 2030 for delivering a second new site.
- 5.2 In order to address this concern, and improve the Council's ability to measure the effectiveness of the policy, we have proposed a modification that is considered to be minor to the monitoring framework to include a target to deliver 23 pitches across the Submission Local Plan period. This reflects the need identified in Newham's Gypsy and Traveller Accommodation assessment. We have also sought to future proof the criteria by referencing the emerging London-wide Gypsy and Traveller Accommodation Needs Assessment, in the event this updates our evidence of need. A timeframe for delivery of these pitches is not included, noting the challenge in identifying land for pitch delivery (see section 2). However, we have included this target to reflect our aspirations to deliver enough pitches to meet need across the plan period.

Table 6: Modification to Monitoring Framework for the Inspector's consideration

Policy	Policy part
<p>No target. 23 pitches between 2022 and 2038.</p> <p>Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the Greater London Authority.</p>	<p>Monitoring indicator 33 - Target and Scope of monitoring section</p>