

# Gypsy and Traveller Site Search - Equalities Analysis (update)



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Period of equality analysis:

7<sup>th</sup> November 2011- 18<sup>th</sup> December 2011

Analysis relates to this specific location:

Ladywell: SE13 7UU

<http://g.co/maps/vs9vj>

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## 1. Purpose

- 1.1 On the 5<sup>th</sup> October 2011 Mayor and Cabinet considered a report about accommodation for Gypsy and Traveller families in Lewisham. In the report officers set out the findings of a borough needs assessment and site selection process. It was recommended that the Council consult on the potential redevelopment of the former Watergate school site on Church Grove as Lewisham's preferred location for a Gypsy and Traveller site. The consultation was also designed to take into account residents' opinions for other locations and consideration of the needs of potential residents for the new site as well as settled residents in the local area.
- 1.2 A full Equalities Impact Assessment (EIA) was carried out as part of the work which led to Mayor and Cabinet approving the previous selection of the Church Grove site in June 2007. The purpose of this Equalities Analysis Assessment is to refresh the 2007 Impact Assessment and make it relevant to the current process. It will be reported to Mayor and Cabinet for consideration at the same time as the results of the consultation process agreed on the 5<sup>th</sup> of October 2011.

## 2. Background

- 2.1 In 2007 the Council closed Lewisham's only Travellers site on Thurston Road in Lewisham town centre. The land was required as part of the regeneration master plan for the redevelopment of the local area. Additionally, officers raised concerns about the health and safety of site residents because the site had come to the end of its useful life and was no longer fit for purpose.
- 2.2 Following an extensive search, two sites were shortlisted against a number of criteria and found to be the best potential locations for new homes for the families from Thurston Road. These sites were: the lorry park in Catford, adjacent to Laurence House and the site of the former Watergate school in Church Grove, Ladywell. Following consultation with settled residents at both of the proposed sites and with members of the Gypsy and Traveller community, the site in Ladywell was selected by the Mayor as the location for the new development.
- 2.3 As part of the 2007 consultation process a full Equalities Impact Assessment was carried out. The aim of the assessment was to ascertain whether the proposed relocation of families from Thurston Road to Church Grove would have a positive or negative impact on protected equalities groups in Lewisham.
- 2.4 The 2007 EIA identified issues across a range of protected characteristics that needed to be addressed. These referred directly to the families moving from Thurston Road and included:
  - The needs of disabled residents
  - Provision for children and young people
  - Consideration of the needs of the Traveller women- specifically related to their roles as parents and carers
  - The needs of the traveller families as a group of religious believers
  - The importance of building community cohesion
- 2.5 The overall assessment in 2007 was that the proposed relocation would not discriminate and no adverse equalities impacts were identified.
- 2.6 The proposed actions identified as part of the report's action plan included: adaptations to homes as required to make them more accessible, the promotion of positive community relations (including working with Race Equality Action Lewisham

and the Irish Centre) and providing continued support to the Travellers on the new site<sup>1</sup>.

- 2.7 Due to a change in their circumstances the families from Thurston Road did not move to Church Grove and plans for the site were put on hold. Following the recent needs assessment and site search process, it has become necessary to return to the equalities analysis of the proposed development in Church Grove. For full detail on the 2007 EIA, refer to Appendix 3 of this report.
- 2.8 The specific aim of this equality analysis assessment (previously known as Equality Impact Assessment), is to identify the positive and negative impacts of the potential redevelopment of the former Watergate school site on Church Grove as Lewisham's preferred location for a Gypsy and Traveller site on the protected characteristics of residents in Lewisham. The assessment also considers the impact of not proceeding with the proposed development.
- 2.9 The results of the 2007 EIA will be taken into consideration however, this analysis assessment has been updated and made relevant to the current assessment and consultation process.
  - This review has a broader focus than the 2007 EIA. In 2007 the assessment focused on the families living at Thurston Road. This review takes into account the wider Gypsy and Traveller population in Lewisham and the potential impacts of the decision whether or not to proceed with the Church Grove development.
  - The Council has an obligation to have regard for the duties set out in the new Equality Act 2010. These will be further outlined below. Because Gypsies and Travellers are recognised by the courts as distinct ethnic groups the Council must, in the exercise of its functions, have due regard to these duties.

### **3. The Equality Act**

- 3.1 The Equality Act 2010 became law in October 2010. The Act aims to streamline all previous anti-discrimination laws within a Single Act. The new public sector Equality Duty, which is part of the Equality Act 2010, came into effect on the 5 April 2011.
- 3.2 The new equality legislation covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. It also applies to marriage and civil partnership, but only in respect to eliminating unlawful discrimination and only in relation to employment. For more information on the protected characteristics, refer to Appendix 1.
- 3.3 The Equality Duty has three aims. It requires public bodies (including local authorities) when making decisions to have due regard to the need to:
  - I. eliminate unlawful discrimination, harassment, victimisation and any conduct prohibited by the Equality Act 2010
  - II. advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
  - III. foster good relations between people who share a protected characteristic and people who do not share it.

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<sup>1</sup> Text from the 'Relocation of Travellers' Site – Results of Consultation' report to Mayor and Cabinet 28<sup>th</sup> June 2007

#### 4. Equalities analysis assessment

4.1 Outlined below, are the results of an exercise to look at the potential positive and negative equality impacts of Church Grove as Lewisham's preferred location for a Gypsy and Traveller site on the protected characteristics of residents in Lewisham. This assessment is intended to inform the decision making process around the proposed development. The impacts of not proceeding with the development are also considered:

Protected characteristic	Potential impact (Low, medium, high) (Positive or negative)	Potential impacts
<b>Age</b>	<ul style="list-style-type: none"> <li>High/negative</li> </ul>	<ul style="list-style-type: none"> <li>Safety of access to and from the site and the immediate area for people of all ages could be compromised by poor design, construction or management.</li> </ul>
	<ul style="list-style-type: none"> <li>Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>Potential for children from different communities to encounter, explore and understand different cultures and communities, allowing children and young people from the Travelling and settled communities to live and learn together.</li> </ul>
	<ul style="list-style-type: none"> <li>Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>Good access to local schools, education and services is crucial to ensuring excellent life chances for all children and young people.</li> </ul>
	<ul style="list-style-type: none"> <li>Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>Deciding not to proceed with the site would delay provision for families with housing need. The mobility of Gypsy and Traveller children due to insecurity of housing tenure may have a negative impact.</li> </ul>
<b>Disability</b>	<ul style="list-style-type: none"> <li>Low/positive</li> </ul>	<ul style="list-style-type: none"> <li>Potential to provide suitable accessible accommodation for disabled people, which could improve access to additional support, services and resources in the local community.</li> </ul>
	<ul style="list-style-type: none"> <li>Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>Poor design, management or construction of the site could compromise safe access to and from the site and the immediate area for disabled people.</li> </ul>
	<ul style="list-style-type: none"> <li>High/negative</li> </ul>	<ul style="list-style-type: none"> <li>Poor community relations or site design may impact on the long term mental and physical health of local settled residents as well as members of the Traveller community.</li> </ul>
	<ul style="list-style-type: none"> <li>Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>Deciding to proceed with the site would delay provision for families with housing need. Disabled</li> </ul>

		people in the Gypsy and Traveller community, who may benefit from the security of provision on a Traveller site would remain in settled housing, which may be inappropriate for their needs.
<b>Gender</b>	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• A secure and well designed site would allow single parent families to better engage with local schools, services and support.</li> </ul>
	<ul style="list-style-type: none"> <li>• High/positive</li> </ul>	<ul style="list-style-type: none"> <li>• A safe, secure well-designed site could support the role of women living at the Gypsy and Traveller site, enhancing their ability to access services, and support from the wider community.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The opposite of the positive impact outlined above is also a potential impact.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The decision not to provide the site would delay provision for families with housing need. The perceived benefits of an extended community network on women in the Travelling community would not be realised.</li> </ul>
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Secure site design, consistency and security of tenure as well as the promotion of good relations between the settled and Traveller community would help to ensure that this protected group are enabled to access services and support available to people in fixed housing.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The opposite of the positive impact outlined above is also a potential impact.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The decision not to provide the site would delay provision for families with housing need. The perceived benefits of appropriate housing (ensuring adequate privacy, access to healthcare facilities and support networks) for people in this protected group would not be realised.</li> </ul>
<b>Marriage and civil partnership</b>	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Only in relation to employment.</li> </ul>
<b>Pregnancy and maternity</b>	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• Potential impact of poor accessibility for residents using prams or push chairs because of parked cars or due to access issues.</li> </ul>

	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Security of tenure, access to health and social services as well as support from the Travelling community on site would give women access to information and an enhanced range of choices. The proposed site has good access to local healthcare services and support.</li> </ul>
	<ul style="list-style-type: none"> <li>• Low/negative</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<b>Race</b>	<ul style="list-style-type: none"> <li>• Low/negative</li> </ul>	<ul style="list-style-type: none"> <li>• Poor community relations between people of different ethnic and cultural backgrounds could potentially lead to conflict.</li> </ul>
	<ul style="list-style-type: none"> <li>• High/negative</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for racist violence, discrimination, harassment, hate crime or prejudice.</li> </ul>
	<ul style="list-style-type: none"> <li>• High/negative</li> </ul>	<ul style="list-style-type: none"> <li>• Inability of co-located communities to effectively communicate due to differing literacy levels, language capabilities or usage of dialect.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Increase in the cultural diversity of the local area. Including, the potential for a well managed and well run site to foster good relations and to mitigate the sometimes negative perceptions of the Gypsy and Traveller community in public discourses and the media.</li> </ul>
	<ul style="list-style-type: none"> <li>• High/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of culturally appropriate accommodation. Demonstrating Lewisham's commitment to provide good quality housing for all citizens.</li> </ul>
	<ul style="list-style-type: none"> <li>• High/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The decision not to proceed with the development would delay housing provision for Travelling families with housing need. The overall well being of people in this protected group may continue to be impacted as a result. The benefits of access to local support services, the security of a dedicated site would not be realised.</li> </ul>
<b>Religion or belief</b>	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• Poor community relations between people of different religions and beliefs could potentially lead to conflict.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Development of a dedicated site could ensure that members of this protected group would be able to</li> </ul>

		access the ceremonies, services, support and pastoral care available through religious institutions – as well as to develop contact with members of the same groups in the settled community.
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The potential for conflict arising between the settled and Travelling communities because of celebrations, religious festivals or the marking of rights of passage.</li> </ul>
<b>Sexual orientation</b>	<ul style="list-style-type: none"> <li>• Medium/positive</li> </ul>	<ul style="list-style-type: none"> <li>• Security of tenure, secure site design and the promotion of good relations between the settled and Traveller community, would help to ensure that this protected group are enabled to access services and support available to people in fixed housing.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The opposite of the positive impact outlined above is also a potential impact.</li> </ul>
	<ul style="list-style-type: none"> <li>• Medium/negative</li> </ul>	<ul style="list-style-type: none"> <li>• The decision not to provide the site would delay provision for families with housing need. The perceived benefits of dedicated accommodation for the Travelling community (ensuring adequate privacy and access to support networks) for people in this protected group would not be realised.</li> </ul>

4.2 The scoping exercise indicates that potential impacts can be grouped under the following headings:

- Access to services and support- for vulnerable residents and people in protected groups.
- Community cohesion/community relations between settled and travelling communities as well as within those two broad categorisations.
- Celebrating cultural diversity and encouraging intercultural communication.
- Safety and security - of site residents, particularly in relation to children and young people, as well as for disabled people, older people with mobility difficulties and people belonging to other protected groups within the Travelling community.
- Site design and physical access - including issues relating to the approach to the site for site residents and people in protected groups in the local settled community.

## 5. Assessment of relevant data, policy and research

5.1 This section will explore sources of available evidence to help identify whether the initial findings, outlined above, which are grouped under five headings are robust, proportionate and can be justified. Relevant research and data information will be used to inform the outcome of this equalities analysis assessment- as well as to develop mitigating actions for adverse impacts. Appendix 2 sets out the demographic



data of Lewisham central – which is the ward where the development site is located. No detailed information about the location of Gypsy and Traveller families in the borough is available. However, information from the Council’s school improvement team suggests that families with school age children are clustered in the north and south of the borough.

- 5.2 The most recent research about the Gypsy and Traveller community in Lewisham was compiled by the survey company ‘Local Dialogue’ as part of the borough’s *Gypsy and Traveller future needs assessment* (2011). The survey found that it was difficult to accurately determine the number of Gypsy and Traveller families in the borough - because almost all families currently live in houses. However, Local Dialogue estimated that there are approximately 100 families currently living in the borough. It estimated further that 70 per cent of these are thought to be of Irish Traveller origin, with the remaining 30 per cent consisting of Roma Gypsies, English Gypsies and New Age Travellers.
- 5.3 All respondents to the Local Dialogue survey thought Lewisham Council should provide pitch sites, with some specifying the need for them to be in safe places, near schools and other amenities as well as being able to accommodate additional/disabled needs.

#### 5.4 Access to services and support

As noted in the report to Mayor and Cabinet on 5<sup>th</sup> October 2011; the 01/2006 government circular stated that: ‘Gypsies and Travellers are believed to experience the worst health and education status of any disadvantaged group in England (and that) research has consistently confirmed the link between the lack of good quality sites for gypsies and travellers and poor health and education.’

The government funded research project into the *Health Status of Gypsies & Travellers in England* (2004) found that:

- Gypsies and Travellers have significantly poorer health and more self-reported symptoms of ill health than other UK residents, English speaking ethnic minorities and economically disadvantaged white UK residents’.
- Gypsies and Travellers have poorer health than that of their age/sex matched comparators.
- Living in a house for Gypsies and Travellers is associated with long term illness, poorer health state, and anxiety. Those who rarely travel have the poorest health.
- The health inequality between Gypsies and Travellers and the UK general population is large. Reported health care problems are between two to five times more prevalent than the wider population.
- There is an excess prevalence of miscarriages, stillbirths, neonatal deaths and premature death of older offspring.

Information gathered by Local Dialogue for Lewisham’s *Gypsy and Traveller future needs assessment* (2011) indicates that the high level of mobility in housing tenure, due to difficulties with housing provision in the Travelling community, increases the level of disconnection from services and support. The report notes the view that: ‘...mobility would be likely to decrease if there was provision of residential pitches in Lewisham’ (p27).

The Equality and Human Rights Commission (EHRC) report *Gypsies and Travellers: simple solutions for living together* (2009) states: in terms of health and education they (Gypsies and Travellers) are one of the most deprived groups in the Britain – and that:

- Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average.
- Gypsy and Traveller mothers are 20 times more likely than the rest of the population to have experienced the death of a child.
- In 2003, less than a quarter of Gypsy and Traveller children obtained five GCSEs and A\*-C grades, compared to a national average of over half.

Furthermore, EHRC's research review into *Inequalities experienced by Gypsy and Traveller communities* (2009) which looked at a broad range of research and data highlights: '...the pervasive and corrosive impact of experiencing racism and discrimination throughout an entire lifespan and in employment, social and public contexts...' which affects Gypsy and Traveller people. It notes further that: '...the lack of suitable, secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience'.

Of the respondents to the Future Needs Assessment two claimed to be very unsatisfied with their housing and declared a level of depression and mental health issues for themselves and their family as a result of living in their current privately rented accommodation. The security of a permanent site would provide the Council and its partners with the opportunity to effectively target support towards vulnerable residents, including disabled people, those experiencing domestic abuse, expectant mothers and those with long term health problems. As set out in the Government's *Gypsy and Traveller Site Management: Good Practice Guide* (2009) 'Clearly families able to settle on well managed and maintained authorised sites are better able to access health and education services, and access a better quality of life, than those unable to find an authorised pitch and forced to live on the margins of society.' It should be noted that Lewisham has had a low incidence of unauthorised encampments.

Finally, Lewisham's *Children and young people's plan* (2009-2012) sets out the aim to close the attainment gap between underachieving pupils and their peers. Children from the Travelling community are listed amongst underachieving groups.

If the proposed development does not proceed it would be reasonable to conclude, based on the relevant research, that the uncertainty of housing tenure and the associated difficulties outlined above will persist for Lewisham's Gypsy and Traveller families in housing need.

### 5.5 Community cohesion/community relations

The concept of cohesion has been widely debated – and it means different things to different people. The EHRC paper on *Inequalities experienced by Gypsy and Traveller communities* (2009) notes that the research and data in this area sparse. Most assessments of cohesion start with the Cattle report into community cohesion (2001) which highlighted the division and special separation between some of Britain's communities. It set out a number of actions for building relations between diverse communities. Of the differing descriptions of cohesion in the available research and policy a number of themes develop which offer some common resemblance, including:

- The notion of shared rights and responsibilities
- The importance of good leadership
- The centrality of open discussion and good communication
- The significance of education and work in schools

- The need to tackle discrimination, unequal treatment and causes of poor life chances

The development in Church Grove would create the potential for conflict. Competing claims to rights and disagreement about responsibilities might bring the two main communities at the site into conflict. However, as highlighted by the EHRC, a ‘...critique of community cohesion policy approaches is that they are (often) imposed on communities rather than being developed by those communities.’ Best practice indicates that a holistic approach which encompasses rights and responsibilities, strong leadership, effective communication, education and a concerted effort to deal with discrimination enables communities to celebrate their differences and work through shared problems collaboratively.

The benefits of the proposed development to those with protected characteristics can be weighed against the potential risk for conflict and disturbance at the proposed site. However, the issue is not clear cut. Community cohesion work suggests that with support and engagement communities can overcome difficulties and potential sources of disagreement. Issues relating to access at the site are discussed further in following sections.

The EHRC briefing: *Gypsies and Travellers- simple solutions for living together* (2009) highlights the potential for Travelling people and their settled neighbours to find common ground:

“We are one community – the Travellers and our settled neighbours. We’ve all got something in common: we want our children to be healthy and educated”  
Gloria Buckley MBE, Romany Gypsy and manager of three authorised sites

## 5.6 Cultural diversity and intercultural communication

The Future Needs Assessment (2011) indicated that the number of families from the Eastern European Roma community is increasing. However, only Irish Traveller families in Lewisham have officially informed Lewisham Council of their interest in living on a site. To date, Roma Gypsies, English Gypsies and New Age Travellers have not been found to have a specific interest in living on sites. In the ongoing assessment of housing needs, the Council will need to ensure that it enables all sections of the Travelling community to become involved in decision making processes.

Lewisham’s *Sustainable Communities Strategy* (2008-2020) aims to recognise the value of all sections of society and ensure that citizens are encouraged and enabled to involve themselves in the life of the borough. Gypsies, Travellers and Roma people are part of Lewisham’s diverse community. The decision not to proceed with the development may create the misconception that this community does not have an equal place as part of Lewisham’s diverse community of communities, negatively impacting the Partnership’s work with citizens to narrow the gap in outcomes for all citizens.

## 5.7 Safety and security

Information provided by the housing charity ‘Shelter’ suggests that ‘Racism towards Gypsies and Travellers is still regarded as socially acceptable, fuelling discrimination and increasing (their) distrust of support services.’ (Shelter 2007) The effect of discrimination and unequal treatment may leave members of the Travelling community and those sharing protected characteristics within the community vulnerable to violence, assault or threatening behaviour.

The borough police record data on racial and religious hate crime as well as incidences of homophobic crime. The Metropolitan Police Service works with the local authority to

establish reporting and recording routes for this type of crime. Figures for Lewisham show that there were 213 incidents of racist and religious hate crime in the year to December 2011<sup>2</sup>, of a total of almost 28,000 recorded crimes, which is comparable with neighbouring boroughs. However, the EHRC report into inequalities experienced by the Gypsy and Traveller community suggests that there may be a significant under reporting of hate crime due to fear and mistrust.

The Crime and Safety impact assessment carried out as part of the consultation states that: ‘...there is likely to be an increase of tensions within the Community surrounding any Travellers site application no matter where the proposed location was to be within Lewisham Borough.’ It further recommends that the police be involved in the potential development of the site.

### 5.8 Site design and physical access

Effective practice on established Traveller sites suggests that a consistent site management approach and effective lines of communication between settled residents and site residents can mitigate the impact of potential problems and conflicts *Gypsy and Traveller Site Management: Good Practice Guide* (2009). Involvement with the local assembly, facilitated local meetings and work with local elected representatives (who are already working with members of both communities) are also important ways in which the two communities could come together to deal with collective issues or problems.

The Department of Communities and Local Government (DCLG) *Designing Gypsy and Traveller Sites Good Practice Guide* (2008) sets out guidance on the design and layout of proposed Gypsy and Traveller sites. The guidance (albeit in draft form then) was used in the design of the proposed development which received planning permission in 2008 and resulted in its inclusion in the final DCLG Good Practice Guide as an example of well designed site (Annex B.3 Small scale site – urban location, pp62-63). Furthermore, the guidance states that those who have lived on sites for most or all of their lives are in the best position to advise on what works well and what doesn’t for a particular community. The 2007 EIA sets out the results of consultation with the resident of Thurston Road, who gave their views about the suitability of two different sites for Traveller accommodation in the borough. Of the options available, their preference was for a site on Church Grove.

The technical report on suitability of access to the site sets out options for revised access arrangements at the proposed development. It is clear that there are potential impacts on parking for local settled residents when, for example, static caravans need to be moved, however this could be compared with the inconvenience caused by a removal lorry for settled housing. The impact on the community of the previous use of the site as a school in terms of traffic, access for emergency and refuse vehicles as well as the impact on protected characteristics in the settled community does not appear to be fundamentally different from the impact of the proposed development.

## **6. Consultation**

6.1 In the development of the consultation process officers worked to ensure equalities issues and concerns could be raised and recorded. There were four public drop-in sessions, a public meeting, a research visit to a London borough with an established gypsy and traveller site (requested by residents and facilitated by the Council), alongside two drop in sessions at the Irish Community Centre and a drop in session at Downham Health and Leisure Centre. The drop in sessions at the Irish Centre and in Downham were facilitated by Lewisham’s Traveller outreach worker. They were designed to allow members of the Travelling community to ask questions, review plans for the development and raise issues or concerns specific to the community.

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<sup>2</sup> <http://www.met.police.uk/crimefigures/datatable.php?borough=pl&period=year>

- 6.2 It is often pragmatic to be able to refer to the 'settled community' and the 'Gypsy and Traveller community'. However, both sets of people contain variation and difference. It can not be assumed that all members of a group share the same opinion or chose to live in entirely the same ways. In this context – *community* refers to the ties and resemblance each person recognises with others.
- 6.3 The report to Mayor and Cabinet setting out the results of the consultation outlines the central issues raised in the consultation process. Responses from the consultation have been included in the following section where particular concerns or comments have been raised in relation to one or more of the protected characteristics. This includes a review of all of the written responses to the consultation as well as comments, questions or concerns raised with officers at meetings and drop in sessions. General statements about the need to eliminate unlawful discrimination, advance equality of opportunity or foster good relations have also been included in the following sections.

#### 6.4 Access to services and support

There were no written representations mentioning the potential for enhanced access to services or support. However responses to the Local Dialogue Future Needs Assessment included health, education and leisure services amongst the services families from the Travelling community would like better access to.

#### 6.5 Community cohesion/community relations

The potential for conflict and hostility between members of different communities was highlighted in the 2007 EIA. Work will need to be carried out to ensure that both communities understand their rights and responsibilities. This is particularly the case in relation to access and parking arrangements. A number of responses, both verbal and written were put forward during the consultation process raising the concern that the area around the new site would become 'a battle ground' or a 'war zone' due to disagreements over parking and access. Issues about access raised during the consultation process are outlined further in the full report to Mayor and Cabinet. A technical report into access at the site sets out options for revised access arrangements at the site. These have community cohesion implications and need to be weighed against the potential benefits to the Gypsy and Traveller community of the proposed development.

Comments, concerns and even fears about community cohesion indicate that respondents to the consultation are already thinking about the importance of building relationships with their neighbours. Discussions with colleagues in other London boroughs about community cohesion and travellers sites indicates that there is the potential for early resistance and fears about Traveller site developments to be overcome through good site management and effective community relations work.

#### 6.6 Cultural diversity and intercultural communication

It should be noted that the local settled community have consistently and vocally highlighted their support for the Traveller community and their willingness to meet with Traveller families. Initial meetings between settled residents and Traveller families (including a visit by residents to two Traveller sites in East London) have been positive. Consultation with Travellers has highlighted a willingness to engage with local settled residents and work collaboratively to deal with issues and concerns.

Responses to the consultation also highlighted the fear felt by individuals of negative stereotyping and discrimination. Some members of the settled community have

expressed their fears of being thought of as racist for opposing the development of the site. Members of the Traveller community have acknowledged the detrimental effect of negative reporting in popular media on attitudes towards Gypsy and Traveller people. And- whilst there is a distinction between attitudes towards the proposed development of a Gypsy and Traveller site in the proposed location- and attitudes towards Gypsy and Traveller people, the underlying context of fear, discrimination and unequal treatment in wider society (noted in section 5 of this report), may serve to construe Gypsy and Traveller people, or their ways of life, as inherently problematic or undesirable.

The borough's Future Needs Assessment highlighted the importance of building trust between members of the Travelling community and Lewisham Council. The development of a site in Lewisham has the clear potential to have a number of positive impacts on the community and it's interaction with public organisations in the borough. Conversely, the decision not to proceed with the development may make future consultation with the Traveller community more difficult and unfruitful.

### 6.7 Safety and security

No written responses received about the threat of violence or hate crime other than general comments about community cohesion and safety (as outlined above). Responses to the Local Dialogue Future Needs assessment included comments about the uncertainty, insecurity and potential dangers facing Travelling people in settled housing.

### 6.8 Site design and physical access

The 2007 EIA into the relocation of the families from Thurston Road suggested that all caravans including the widest continental caravans would be able to gain access (with care) along Church Grove proposed site. In addition it was stated that the low levels of existing traffic and the infrequent access/egress needs of caravans would be unlikely to cause any significant obstruction. It maintained that there were unlikely to be any significant safety concerns raised by caravan movements to and from the site.

However, new concerns have been raised in the current consultation process about access to the site and the impact on people with mobility issues in the settled community. The issue of access has been reviewed – and a decision will be made by Mayor and Cabinet in early 2012 as to whether new information raises any significant concerns relating to vehicle movements along Church Grove. If the site is approved, further work would be required to ensure that any access solution takes into account the needs of people with protected characteristics in the settled community. Good site management, signage and safety measures as well as effective communication between the settled and Travelling communities could be utilised to mitigate potential risks, issues or problems.

Consultation with families in the Travelling community reiterated the need to ensure that the river bordering the site is inaccessible to children.

### 6.9 Other

Some respondents to the consultation also raised concerns about the equity of using the Church Grove site to provide five pitches for Gypsy and Traveller families, when the site could potentially be used for other purposes, including higher density housing or sheltered accommodation for older people. As outlined above – government policy sets out the requirement for Councils to establish their housing needs and determine suitable provision accordingly. Regard may also be given to

the need to advance equality of opportunity between groups. The provision of a site corresponds with the aims of these principles and fits within the Council's wider site allocations and housing strategies.

## **7. Findings and results**

7.1 Following initial analysis assessment and identification of potential areas for discrimination, use of data and research and consultation responses, the assessment checked whether, in any of the areas identified:

- there is unlawful discrimination
- there is an adverse impact on one or more equality categories
- the proposal fails to promote equality of access or opportunity
- some equality categories are, or may, be excluded from service benefits
- some equality categories are disadvantaged

7.2 Taking into consideration the issues raised in the consultation and building on the work carried out in the 2007 equalities impact assessment, no major change is required to proposal to develop a Gypsy and Traveller site in the preferred location. It is considered that the negative impacts drawn out by the assessment could be:

- mitigated through good site management and community work and
- balanced by the need to provide a stable, secure, well designed site for Gypsy and Traveller families in the borough.

7.3 Nonetheless, as stated in previous reports to Mayor and Cabinet any decision on the preferred site taken by the Mayor will be required to follow proper consideration of the needs of the Travelling community balanced with the needs of local residents, having regard to all other relevant considerations. A number of the points raised in the scoping exercise and in the consultation relate to management of physical access to the proposed site. The results of a technical report on suitability of access will be presented to Mayor and Cabinet at the same time as the results of the consultation exercise and will feed into the final decision on the provision of the site.

7.4 The impact assessment highlights a number of potential negative impacts for protected groups if the proposed development is not progressed. Available research and data indicate that the lack of provision of appropriate accommodation for Gypsies and Travellers is linked to poor outcomes in terms of health, education and wellbeing.

7.5 The decision not to proceed with the current proposal may further delay the provision of accommodation for Gypsies and Travellers in Lewisham. Taking into account the detrimental effect of the proposed transport mitigation measures on members of the local settled community, Mayor and Cabinet will need to consider the adverse impacts on the Gypsy and Traveller community of prolonging the site search process.

7.6 The negative impact of the decision not to proceed with the current proposal can be mitigated through future work to identify an alternative site for a Gypsy and Traveller accommodation in the borough. Actions to mitigate the potential negative impact of the decision not to proceed are set out in the following section.

## **8. Equalities analysis: proposed actions**

The actions set out in the following section are dependant on the decision made at Mayor and Cabinet regarding the future of the Church Grove site. Officers responsible for the Gypsy and Traveller site search project will be responsible for their development and implementation, as necessary.

### **Decision to develop the proposal:**

#### **8.1 Access to services and support**

Effective site management and work with partners:

Work with local schools, healthcare providers and partners to ensure that site residents would be able to access services and support. Good site management (as advocated by the *Gypsy and Traveller Site Management: Good Practice Guide* (2009)) would be essential to ensure that residents are able to engage with local services and deal with potential problems quickly and effectively.

#### **8.2 Community cohesion/community relations**

Work with local assemblies and elected representatives:

Engagement and capacity building work with all members of the community. Local decision making bodies and Council members could operate as a bridging mechanism between settled and Gypsy/Traveller residents. As set out in the 2007 assessment – further work would be required to build trust and ensure harmonious community relations.

Effective allocations and management policies:

Developing on best practice- good site management would promote good relations between residents of the proposed site and their neighbours. Further work would be required to determine how the allocations and management policies for the site would operate.

#### **8.3 Cultural diversity and intercultural communication**

Communication:

Work to ensure that lines of communication are available to members of all communities to raise potential concerns, problems or solutions to issues at an early stage. This would include work with existing support services for Gypsies and Travellers in the borough and in neighbouring boroughs.

Work with local schools and education providers:

Work with regional organisations who advocate for the Gypsy and Traveller community. The capacity of young people to see beyond difference and bring communities together could be enhanced through work with local schools in order to support the work of teachers and educators in developing cross cultural celebration and intercultural dialogue.

#### **8.4 Safety and security**

Health and safety:

Risk assessments and management plans (as part of the site management process) would need to be put in place to ensure that residents in the settled and the Gypsy and Traveller communities understand their rights and responsibilities regarding access to the new site. The needs of disabled people living in the local area – and on the proposed development would need to be considered at an early stage of site delivery.



8.5 Site design and physical access:

The issues raised in the supplementary work as part of the consultation should be weighed against the need to provide suitable, secure, safe accommodation for Lewisham's Gypsy and Traveller community. The potential for good management and work with the local community to mitigate the potential impact of access issues to the site could be explored further. Measures put in place to deal with the specific access limitations at the proposed site would need to take into consideration access needs for people with mobility difficulties, wheelchair users and the requirements of parents with prams and push chairs.

**Decision not to develop the current proposal:**

- 8.6 Further work to identify a suitable location for a Gypsy and Traveller site in the borough.
- 8.7 Continued engagement with the Gypsy and Traveller forum and Gypsy and Traveller organisations in the borough to ensure that lines of communication remain open.
- 8.8 Work to enable organisations in the borough responsible for tackling racism are maximising their efforts to engage with the Gypsy and Traveller community.
- 8.9 Reassessment of housing needs, when appropriate, to ensure that all sections of the Gypsy and Traveller community are able to feed into decision making processes and demonstrate their housing needs.
- 8.10 Continued work by the school improvement team in the Council's Children and Young People's directorate to support all vulnerable Traveller children and maximise their life chances and well being.

## Appendix 1

Available from the EHRC site online at: <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>

The following characteristics are protected characteristics

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

### Age

Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

### Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

### Gender reassignment

The process of transitioning from one gender to another.

### Marriage and civil partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

### Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

### Race

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

### Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

### Sex

A man or a woman.

### Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

More in-depth definitions of these protected characteristics are available the Office of Public Sector Information website.

Appendix 2:



## Lewisham Central Ward Profile

### Population (ONS, 2010)

Lewisham Central: 16,331

Lewisham: 266,500

### Age Structure (ONS, 2010)

People in each age band:

	Lewisham Central Count	Lewisham Central %	Lewisham %
0 - 19	3,301	20.2%	24.5%
20 - 34	5,365	32.9%	26.0%
35 - 49	4,397	26.9%	26.6%
50 - 64	1,905	11.7%	13.5%
65+	1,363	8.3%	9.3%

### Ethnicity (ONS Census, 2001)

Percentage of people in ethnic group:

	Lewisham Central %	Lewisham %
White	61.9%	65.9%
Black or Black British	26.0%	23.4%
Mixed	4.6%	4.2%
Asian or Asian British	5.2%	3.8%
Chinese or Other Ethnic Group	2.3%	2.7%



### Average Life Expectancy At Birth (ONS, 2003)

Lewisham Central:  
75.2 years

Lewisham: 76.6 years

### Average Annual Earnings (CACI, 2008)

Lewisham Central:  
£30,812

Lewisham: £28,865

### Average House Prices (DCLG, 2001)

Lewisham Central:  
£119,154

Lewisham: £134,782

## Economic Activity (ONS Census, 2001)

	Economically Active					Economically Inactive					
	Total %	Employed %	Self-Employed %	F/T Student %	Unemployed %	Total %	Retired %	Student %	Caring for family %	Sick/Disabled %	Other %
Lewisham Central	70.1%	54.2%	6.3%	3.9%	5.6%	29.9%	7.6%	6.6%	5.6%	5.6%	4.5%
Lewisham	68.9%	52.1%	7.7%	3.4%	5.6%	31.1%	8.7%	6.5%	6.5%	4.8%	4.5%

## Crime Rates per 1,000 Population (Metropolitan Police, 2011) (12 months to October 2011)

Number of crimes per 1,000 population

	Burglary	Criminal Damage	Drugs Offences	Fraud & Forgery	Other Offences	Robbery	Sexual Offences	Theft & Handling	Violence Against The Person
Lewisham Central	17.4	21.9	23.1	10.5	3.7	13.3	2.9	100.5	56.0
Lewisham	13.4	12.0	8.5	5.8	1.9	6.8	1.5	35.2	26.0
London	13.3	10.3	8.2	5.0	1.5	5.3	1.3	44.8	21.3

## Religion (ONS Census, 2001)

Percentage of people of each religion:

	Christian %	Muslim %	Hindu %	Jewish %	Sikh %	Buddhist %	Other Religion %	No Religion %	Not Stated %
Lewisham Central	59.4%	4.6%	2.6%	0.3%	0.1%	0.8%	0.5%	21.9%	9.8%
Lewisham	61.2%	4.6%	1.7%	0.3%	0.2%	1.1%	0.5%	20.4%	10.1%

## Highest Level of Qualification, (ONS Census, 2001)

Percentage of people with qualifications

	Lewisham Central %	Lewisham %
No Qualification	21.5%	24.2%
Level 1	13.2%	14.2%
Level 2	16.3%	17.4%
Level 3	9.0%	9.0%
Level 4 or Higher	34.4%	29.4%
Other Qualifications	5.4%	5.7%

## Housing Tenure (ONS Census, 2001)

Percentage of people in each tenure type:

	Owner Occupier %	Private Rented %	Local Authority %	Other %
Lewisham Central	47.5%	19.8%	22.2%	10.4%
Lewisham	51.0%	13.5%	26.5%	9.0%

For further information on sources and data please refer to the Ward Profile Glossary.

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## **Appendix 3:**

### **RELOCATION OF THE THURSTON ROAD TRAVELLERS SITE EQUALITIES**

#### **IMPACT ASSESSMENT**

##### **Introduction**

This impact assessment was undertaken using the methodology and approach set out in Lewisham's Equalities Impact Assessment toolkit. Every new or revised policy requires the undertaking of such an assessment, to ensure that the policy proposals address equalities and that the policy and its implementation meet both the aspirations set out in the Council's equalities policies AND statutory requirements. The impact assessment has considered the equalities implications of the decision to relocate the Thurston Road Travellers Site AND the two specific locations which are currently being considered, Church Grove and Laurence House Car Park. The assessment focuses on the specific impact for the Traveller families who are directly affected AND for equalities groups within the wider community. It does not cover an overall assessment of the accommodation needs of Gypsies and Travellers within the LB Lewisham, which will be addressed through our wider strategic housing work. Having made this assessment the report sets out the action to be taken to prevent direct and indirect discrimination and positively promote positive and harmonious community relations.

Steps taken in undertaking the Equality Impact Assessment

##### **1. Management of the Equalities Impact Assessment**

The assessment was undertaken by Dalewyn Daniel, Performance Quality and Information Team, Regeneration, working with Michele Lawrence and Carol Long from the Capital Programmes Team in Regeneration.

##### **2. Identification of the purpose and aims/objectives of the proposed relocation**

There is a need to relocate the current residents of the Traveller's site situated at Thurston Road for two reasons.

(1) The current site is at the end of its useful life and it is at a stage where significant refurbishment and improvements are required. In addition the Authority has concerns over the long term structural stability of the railway retaining wall and the disruption consequent protective works would cause.

(2) The site has been identified by partners in the Lewisham Gateway Comprehensive Regeneration Scheme as a suitable alternative site for the bus station, which is a key element in the Lewisham transport interchange. The site was first highlighted for this purpose as part of the Lewisham gateway planning brief which was published in December 2002 as a guide to potential developers. The Gateway Scheme is progressing and currently AMEC Developments and Taylor Woodrow are continuing work on their plan for the Lewisham Gateway.

Consequently, the aims and objectives of this assessment are to check to see whether the proposed relocation is likely to have a positive or negative impact on different groups within Lewisham's diverse community.

##### **3. Scope/focus of the Equality Impact Assessment and assessment of relevance**

The table below assesses the relevance of equalities legislation and potential impact of the relocation on different groups within society. This is done to help start scoping the

impact assessment, in order to determine the answer to the two key questions.

Could this relocation – and the way we will deliver it – affect some groups in society differently?

Will/can this relocation – and the way we will deliver it – promote equal opportunities?

## **AGE**

### **Medium/High**

There are a significant number of Older People and Young Children who need to be relocated. They range in ages between 94-4 - 2 pensioners, females -2 adult females with 3 children each -2 adult females who are absent due to their amenity buildings not being fit to live in. It is important that the location agreed upon is close to local amenities and services.

## **DISABILITY**

### **Medium/High**

There are two female disabled residents aged 94 and 72 that will need to be relocated. Adaptations will need to be carried out at the agreed properties.

## **RACE**

### **High**

Gypsies and Irish Travellers have been recognised as racial groups for the purposes of the Race

Relations Amendment Act (RRAA). This recognition aims to challenge discrimination, stereotypes and negative attitudes towards the Traveller community. The council has a statutory duty to promote positive and harmonious relations between different ethnic groups and this is an important consideration for this EIA. Relations between the Travellers and members of the communities of the proposed relocation sites are a particular cause for concern, as people from these groups often lead separate, parallel lives. This can lead to misconceptions about aspects of Gypsy and Traveller life that manifest in discriminatory behaviour towards them. Work must be done to promote good relations between Gypsies and Travellers and the local communities. This will inevitably include a scoping of the issues for both the Travellers and the local community.

## **GENDER**

### **Medium/High**

Most of the Travellers that need relocating are Women. There may be possible safety issues. The

younger women in the family are carers to the elderly members. The children ( all male) will also

need to continue having access to school.

## **SEXUAL ORIENTATION**

### **Nil**

## **RELIGION AND BELIEF**

### **Medium**

The Travellers are devout Catholics and there is a need for them to continue worshipping at the church they currently attend.

## **HUMAN RIGHTS**

### **Medium/High**

Article 8 of the Human Rights Act (right to home life), and Article 14 (freedom from discrimination on any ground such as sex, race colour, language, religion or political opinion).

## **4. Assessment Of Relevance To The Councils Policies And Plans**

The proposed relocation is affected by – and affects – the work of a range of internal and external partners and there is a need to make sure there is common purpose, common commitment and a shared framework for delivery. This EIA is part of a network of policies and strategies that are focused on delivering equality. As shown below, this allows us to consider council-wide strategies and national plans and targets whilst undertaking the assessment.

#### Supporting People Strategy 2005-2010

“Support to Travellers is a very small part of the Supporting People programme and indeed many authorities do not fund any support to this group. Where support is funded, it can be to support both Travellers living on sites and Travellers settled in to houses in the community. There are currently 16 individual sites recorded in Lewisham. However, this number is debatable, as there are currently only nine sites which are habitable and two households are soon to be rehoused. Other families have moved away because of the poor conditions. Since 2003 the site has been managed by Novas Group. Supporting People will continue to fund support for Travellers on site.”

#### Lewisham Housing Strategy 2004-2007

Housing support for people with disabilities: “Lewisham continues to develop and increase the support we provide Lewisham residents with disabilities to live independently and comfortably in their homes, and to also meet the re-housing needs of people with disabilities.” This policy is relevant to this EIA given that the relocation will both offer the opportunity to provide ‘lifetime’ homes, and to meet the specific needs of the current elderly disabled residents.

#### Older Residents

Following a major study in 2001 of housing options for older people, Lewisham is modernising and updating services to ensure they meet the needs and life-style choices of our elderly population.

For older residents who require additional support through sheltered housing schemes we provide the following options:

- very sheltered housing for frail older people
- housing association sheltered housing with resident wardens
- council sheltered housing with the LinkLine electronic alarm system and visiting support workers”

The availability of this service has provided an elder member of the Traveller family with the option of going into a dedicated elderly block which she has taken up, as part of the relocation preparations.

#### The Comprehensive Equalities Policy

The main aim of Lewisham’s Comprehensive Equality Strategy is to ensure that the needs and expectations of all the boroughs communities are fully integrated within all aspects of council business planning and service delivery. It sets out the ways in which Lewisham will examine the needs of its communities and ensure that the services that are planned and provided are appropriate to their needs and aspirations. The section below will detail how the policy will influence the analysis 3 key issues (Race, Disability and Age) that need to be considered in this assessment.

#### Key Equality Theme Race

“Racial harassment and violence is one of the most serious consequences of racism, damaging people emotionally and physically and limiting life choices and opportunities. The Council will take all necessary measures to prevent and tackle racial harassment and assist BME people to live in freedom from harassment. The Council also recognises that there are certain areas of public sector performance where the outcomes for White British people (especially for working class communities) are below target. The council is committed to working for the equality of all ethnic groups. The council is committed to its responsibilities under the Race Relations (Amendment) Act 2000 to promote racial equality.”

#### Key Equality Theme Disability

“The council’s commitment to disabled people’s equality is set out in Achieving Access for All (Lewisham’s Strategy for Disability Equality, 2004). The strategy has 4 objectives.

Objective 1 states:

“We will promote equality for disabled people by: • Removing barriers to accessibility, particularly in relation to housing, education, employment and access to services, information and buildings; [“Removing barriers” includes ensuring access to service through improved physical access and dealing with removing barriers.] • Encouraging good practice in the private sector through our advisory capacity and enforcement powers; • Upholding the Social Model and our guiding principles in our role in procurement and in our partnership duties.”

#### Key Equality Theme Age

The Council is committed to promoting equality of opportunity for younger and older people. We recognise that society has negative attitudes, stereotypes and myths about youth, ageing, younger and older people, and that these attitudes and beliefs can lead to both younger and older people being socially and economically disadvantaged, excluded and marginalised. The Council’s policy on Promoting Independent Living and Wellbeing was produced in 2005 and aims to ensure that local public services are designed to enable older people to participate fully, economically, socially and in community life. Age Equality means securing the equal participation in society of people of every age, securing a balance between equal citizenship, equality of opportunity, equality of outcome and respect for difference.

As set out in the EIA scope, these three themes are directly relevant to this EIA. Gypsies and Irish Travellers are a recognised racial group, who can potentially be exposed to or threatened by racist harassment, discrimination or prejudice. Two of the traveller families are elderly and disabled, while there are also a number of young children whose health and education needs must be considered.

### **5. Assessment of Relevant Data and Research**

A range of national, regional and local data was analysed and considered for this impact assessment. Some of the key data and research considered and issues identified are summarised below.

#### Housing Act 2004

“Local authorities are bound by a statutory duty under section 225(1) of the Housing Act 2004 to assess the accommodation needs of all ethnic groups, including Gypsies and Irish Travellers. This should help authorities to build a clearer picture of the way Gypsies and Irish Travellers have been marginalised in terms of public services, and develop more inclusive and responsive policies and services. Article 225 Duties of local housing authorities: accommodation needs of gypsies and travellers

(1) Every local housing authority must, when undertaking a review of housing needs in their district under section 8 of the Housing Act 1985 (c. 68), carry out an assessment of



the accommodation needs of gypsies and travellers residing in or resorting to their district.

(5a) "gypsies and travellers" has the meaning given by regulations made by the appropriate national authority;

(5b) "accommodation needs" includes needs with respect to the provision of sites on which caravans can be stationed; and

(5c) "caravan" has the same meaning as in Part 1 of the Caravan Sites and Control of Development Act 1960."

Commission for Racial Equality (CRE) Good Practice Guide - Partnership and good community relations with Gypsies and Irish Travellers

According to the above Good Practice Guide:

#### Location of sites

The location of sites for Gypsies and Irish Travellers can damage relations both within and between different communities. Sites often tend to be in polluted and hazardous areas, on land that would be deemed unfit for conventional housing, near landfill sites and motorways and far away from public services.

#### Legal responsibilities under the Race Relations Act

Local authorities have various legal responsibilities towards Gypsies and Irish Travellers, and should make sure that everyone in the communities they serve is aware of them. First, both Gypsies and Irish Travellers have been recognised as racial groups for the purposes of the Race Relations Amendment Act (RRAA). This means it is unlawful for Gypsies or Irish Travellers to be treated less favourably than people from other racial groups, to be discriminated against indirectly, or to be segregated on racial grounds.

Second, as listed public authorities, local authorities have a statutory general duty (under section 71(1) of the RRA) to promote racial equality in carrying out their functions. To help meet this duty, they have been given various specific duties, such as publishing a race equality scheme, which includes conducting race equality impact assessments (REIAs) of all proposed policies that are relevant to the duty. The CRE refers to these responsibilities collectively as the race equality duty."

Royal Town Planning Institute (RTPI) Planning for Gypsies and Travellers Good Practice Guide Note 4:

"One of the key roles of planning is to " address accessibility for all members of the community to jobs, health, housing, education, shops, leisure and facilities" Whilst there are examples of good practice, planning has not addressed these issues well for Gypsy and Traveller communities. There are insufficient sites, services and opportunities for people who wish to pursue a nomadic lifestyle.

Allocation of Gypsy and Traveller sites is often contentious. Experience has shown that a criteria based approach to the selection for development sites is unlikely to be successful in instances where considerable public opposition to the development might be anticipated.

As the object of the Development Planning Document (DPD) is to identify and allocate sites for a specific number of 'pitches' or units of Gypsy and Traveller accommodation, a pragmatic approach is to move direct to identification of a range of potentially suitable sites in consultation with Gypsy and Traveller communities. The local authority and Gypsy and Traveller communities are both able to bring forward their suggested sites

during this process, and the distribution and location of transit as well as permanent sites can be considered. The practical options would then go forward for discussion with the local community, interest groups and other stakeholders before the selection of preferred sites is finalised. The advantages of this approach are its transparency and the certainty it provides both for Gypsies and Travellers and for settled communities.”

#### The Office of the Deputy Prime Minister (ODPM)'s Circular On Site Planning

The main intentions of the circular are:

- To create and support sustainable, respectful, and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision; where there is mutual respect and consideration between all communities for the rights and responsibilities of each community and individual; and where there is respect between individuals and communities towards the environments in which they live and work;
- to reduce the number of unauthorised encampments and developments and the conflict and controversy they cause and to make enforcement more effective where local authorities have complied with the guidance in this Circular;
- to increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3 – 5 years;
- to recognise, protect and facilitate the traditional travelling way of life of gypsies and travellers, whilst respecting the interests of the settled community;
- to underline the importance of assessing needs at regional and sub-regional level and for local authorities to develop strategies to ensure that needs are dealt with fairly and effectively;
- to identify and make provision for the resultant land and accommodation requirements; to ensure that DPDs include fair, realistic and inclusive policies and to ensure identified need is dealt with fairly and effectively;
- to promote more private gypsy and traveller site provision in appropriate locations through the planning system, while recognising that there will always be those who cannot provide their own sites;
- and
- to help to avoid gypsies and travellers becoming homeless through eviction from unauthorised sites without an alternative to move to.

#### Site Condition Survey Report Of The Thurston Road Site November 2006

A Condition Survey Report of the Site carried out by BPTW Partnership in November 2006 found that:

“The site as it is now is not an ideal environment to live and work in. It is in the midst of industrial surroundings with no scope for improvement in terms of environmental and social issues for the residents. The noise and pollution from the railway line and station , the industrial and estate do not create for an ideal living position, as there is nowhere for the residents to feel or be part of a community, when where they live is in the middle of an industrial area. There are no grassed areas for the younger generation of residents to play and socialise.

The high metal railing between each accommodation unit compound give the site a

confined prison like effect. The high retaining wall and embankment to the railway side of the site is dangerous and obviously being recorded for movement and/or collapse. This gives rise to safety issues.

One section has already been underpinned and shored. We have been advised that there is also Japanese knotweed growing in the vicinity. The fact that there is a demolished accommodation unit on the site, which is not hoarded off for residents protection gives rise to further health and safety issues, as does the leaning boundary wall and unpointed and cemented brickwork.

The accommodation units themselves are rather small for the purpose they are used for. When they were built over 30 years ago, they were intended only as temporary accommodation for cooking and washing facilities during the winter months. Currently they are used permanently and do not provide a decent standard of accommodation for the families that reside there. The heating systems sometimes freeze up and there are no smoke detectors etc within the units.

The travellers are keen to remain within Lewisham and continue to be part of the community. This enables them to continue to use the same doctors, shops and schools for their children. However at the present this is very difficult due to the location and standard of the accommodation.”

#### Travellers – Update and Site Search Findings 2005

Housing Development took over management of the Thurston Road site in December 2004 with a view to relocating the travellers. The travellers have lived on the Thurston Road Site for almost 30 years. The site is currently in very poor disrepair and they would need to be moved in any event. A site condition survey has recently been completed. The site originally had 16 plots. A few plots at the Allied Carpets end were closed due to access to the station and subsequently the decision was made not to re-let any further lots as they became vacant. In 2004 only 9 were let, two plots were deemed to be unliveable and the two families moved out. In 2005 the remaining residents were given the following options as agreed by Mayor and Cabinet in July 2005

Relocation to a new site within the borough influenced by their choice. The residents had the same options as council tenants in as much as they were asked if they wished to stay in the same location or move elsewhere in the Borough

Relocation into mainstream housing

Cash incentive to relinquish their licence

As a result of these options:

- 5 decided that they wanted to move on to new site within the same catchment area
- 2 relinquished their licences for a cash incentive
- Just recently, the one gypsy on the site has now moved into Council accommodation

“The Site Search Finding Highlighted the Following: Site Search Criteria the criteria to find an alternative to the Thurston Road site was as follows

□ a minimum replacement of existing pitches up current size of site 16 pitches this equates to 3580 square meters or 225 square metres per pitch plus space for 4 visiting pitches which equals a total of 44890m<sup>2</sup>

- The site could be provided in one location or two separate locations but minimum management size would be preferable at 10 pitches
- Re provision was to be inside the LB Lewisham but an out of boundary solution would be considered if a suitable site or sites were found
- The criteria used was also to relate to the Authorities Unitary Development Plan (UDP) policy SHG 16.

All potential sites would have to be looked at with the following points in mind:

- Be cross referenced with UDP
  - Be considered with the Lewisham Gateway timetable as a key criterion
  - Acquisition and start site with 12-14 months
  - Potential sites would be based on proximity to the existing site as per residents feedback.
- The site should be within or near to an existing residential settlement and to ensure that travellers services remain to their usual health services, shops, contacts.”

There are two potential sites within the ownership of the Authority that officers feel could be suitable:

Site 1 Watergate Site

Site 2 Laurence House Car Park Site

Further research and data which will be available after the production of this EIA and form part of the backdrop to the wider strategic issues around the housing needs of travellers are the outcome of the Housing Needs Study in Lewisham which will assess the specific housing needs of the gypsy and travellers community and feed into the overall London Assessment produced by the GLA, which will allocate targets for numbers of Traveller places to London boroughs.

## **6. Assessment Of Relevant Consultation**

Background and ongoing consultation with the Travellers

In 2004 it was decided corporately that the management of the Travellers site which up to now had fallen under the remit of the Valuation Department would be transferred to Housing Development within the Regeneration Directorate.

Officers from Housing Development then met with NOVAS Overtures, the organisation contracted to manage the current travellers site and an initial consultation strategy was agreed. The travellers were written to individually on 9th December 2005 informing them of the current situation and the change of overall management responsibility. The letter also stated that officers from Housing Development would visit the site to interview all residents.

Between December 2005 and January 2006 two officers from Housing Development were assigned to meet and interview all residents on site to find out their views on the relocation of the travellers site and to get a view on their needs and aspirations. These officers have visited the site at least once a week since then and spend every Thursday

on site so residents can talk to them about any issues they might have. This will continue until the matter is resolved. They have built up a strong relationship with the residents.

After consultation with the residents it became clear that the majority wished to stay in Lewisham as near to the Town centre as possible. There was no opposition to the fact that any relocation could possibly be split into two sites due to space considerations. The idea of two sites was also supported in principal by NOVAS Overtures the managing agent.

The residents understand that their current site is needed for redevelopment but highlighted that at that time without knowing possible sites it was difficult for them to comment further.

The offer made by the Council to the residents was :-

Relocation to a new site within the borough influenced by their choice. The residents had the same options as council tenants in as much as they were asked if they wished to stay in the same location or move elsewhere in the Borough

Relocation into mainstream housing

Cash incentive to relinquish their licence  
As a result of these options

4 decided that they wanted to move on to new site within the same catchment area

2 relinquished their licences for a cash incentive

This meant that 7 plots have to be re-located. Feedback from the travellers made it clear that they felt the site should be within or near to an existing residential settlement and to ensure that travellers remain close to their usual health services, shops and other contacts. The travellers have all visited the two most recent proposed sites, Watergate and the Lorry Park in Catford. They have been consulted on a one to one basis, with all consultation materials being read out to them to ensure full understanding, given literacy levels.

The aim has been to find out:-

1. The suitability of the proposed sites and what are seen as the strengths and weaknesses about each site.
2. If they have any further comments to make about the proposals

Laurence House and Watergate : The Responses from the travellers Laurence House – Travellers have clearly stated that they will not move onto the Laurence House site

#### General Comments

“Not a suitable place for the children or the Senior members of the family. No area for the children to play no nearby playspace. Feel that the site would be open to vandalism. There is a general feeling that the site is on the middle of a roundabout. Worried about Lewisham staff in Laurence House looking into the living of the travellers and being alongside another car park is unsafe. A feeling of being abandoned by the Council after previous years of neglect. Lastly, the travellers will not consider a temporary site after all this time waiting to be moved. They feel that at present they are at the top of the councils agenda because Thurston is needed for a bus station and once moved onto such a unacceptable site as Laurence House they will be left again and not be of any

importance. The Council need to be aware of the inter-problems between the Southwark travellers and the Lewisham travellers, in no way can these two groups be near each other A hope that the Council will see the unsuitability of this site Travellers are quite clear that they will not move onto the lorry park and will refuse to move off of Thurston Road.”

#### Watergate Site

While the travellers have raised some concerns – see below - they would like to move into this site

- Need to make sure the river is safe
- Need to be accepted by neighbours
- Need to ensure that there is no access to the railway and this is safe

#### General Comments

“A place that would be nice for the families to live away from danger. Although they are concerned that the river fencing and the railway track is secure and not accessible. A place where they can still walk to their school, Doctors ,hospital and other services. They would like to be able to work with the local residents to let them know they are just the same as them, families with children who want a decent life. This family of travellers would like to meet with the residents of Church Grove. The travellers would move onto this site Communities and Local Government advise authorities that in placing or relocating travellers it is recommended to ensure travellers are kept with their local health and services including schools in the same way that tenants are asked if they want to stay in their known area.”

#### Visit By Deputy Mayor And LB Lewisham Executive Director for Regeneration

In May 2007 The Deputy Mayor of Lewisham, Cllr Heidi Alexander and the LB Lewisham’s Executive Director for Regeneration, Malcolm Smith, visited the Travellers at the Thurston Road site so as the Travellers could air their views about the proposed relocation.

#### Relocation of Travellers’ Site – Results of Consultation – Report to Mayor and Cabinet – 20th June 2007

A public meeting was held between 5pm and 8pm on 15th May 2007 at St. Mary’s Church Crypt to discuss the proposed use of the former Watergate School Site at which 54 people attended and a similar public meeting was held during the same times on 16<sup>th</sup> May 2007 at the Power League Sports Hall to discuss the proposed use of Laurence House Lorry Park Site at which 65 people attended.

Leaflets inviting comments in writing by 31st May 2007 were then distributed to the following properties:

#### Watergate School site

All the properties in Church Grove, 28/38 (even) Wearside Road and 55 & 57 Ladywell Road plus the Ladywell Society, the Ladywell Fields User Group, and St Mary’s Church.

#### Laurence House Lorry Park

7/15 Canadian Avenue plus British Telecom and the Power League, 187/199 (odd) Rushey Green, Stannard Court, 1/13 (odd) and 6/12 (even) Bromley Road and the Culverley Green Residents Association.

The Council received 61 separate written representations concerning the proposal to use the former Watergate Site, including one from the Ladywell Fields User Group. It also received a letter from a firm of planning consultants on behalf of certain residents in Church Grove. This detailed why, in their opinion, the Watergate School site was not

suitable and that the Travellers Site should be located on the Laurence House Lorry Park Site. Of all of these, only one person was in favour of the proposal and this was on the basis that access was via Wearside Depot, not Church Grove.

The Council received 127 separate written representations concerning the proposal to use the Laurence House Lorry Park Site, including one from the Culverley Green Residents Association, plus two petitions with a total of 503 signatures who were against the proposals. It also received two letters from agents responsible for managing certain commercial properties in the Catford area. Of all of these, only four persons were in favour of the proposal.

Many of the respondents in respect of both sites raised the same concerns. These can be summarised as follows:

☐ Complaints about the consultation process including only a limited number of people contacted, the short period of time for responses, inadequate available information regarding the proposals,

☐ Unequal size in number of occupants consulted in respect of both sites, including questions why Unions were consulted in respect of Laurence House but not Wearside Depot, leading to suspicion of bias and the fact that a decision had already been made and that this was just a “rubber stamping” exercise”,

☐ The Council has not complied with Central Government requirements regarding the consultation process,

☐ Why this issue was not addressed at the time the proposals for Lewisham Gateway were first considered which could have meant that land could have been set aside for them elsewhere in the Lewisham Town Centre area,

☐ The decision of the Mayor & Cabinet at its meeting last April to consult on these two sites was at odds with the recommendations set out in the CB Richard Ellis report and also that their recommendations are no longer valid as there had been a subsequent material change of circumstances,

☐ Proposals will significantly depress value of properties in the vicinity,

☐ Fear of increased dumping of rubbish, increased crime and general anti social behaviour

☐ Undermining of existing social cohesion and contravention of the human rights of all members of the general public,

☐ A suspicion that the site will be used for pseudo commercial purposes, and

☐ A suspicion that Travellers will occupy any site completely free of charge.

Comments appertaining to the Proposed Use of the former Watergate School Site:

☐ The width of access to site via Church Grove is insufficient to allow movement of caravans and emergency vehicles when current problems with parking are taken into account,

☐ The proposed development is on the flood plain of the River Ravensbourne which will have health and safety implications for the Travellers,

- Proposals will affect the River Ravensbourne re-naturalisation process plus concerns over loss of trees and effects on the local eco system,
- Proposals are detrimental to the adjacent Conservation Area,
- Cost implications since proposed development would need to comply with the design guidelines of Central Government on the design of pitches, plus the enhanced design requirements since site adjoins conservation area and whether in fact site large enough for proposed redevelopment to provide stated number of pitches,
- Concerns over suitability of site on Health & Safety grounds (children in close proximity to river and railway) and noise (from the adjacent railway lines),
- High cost and other practical difficulties of demolishing Watergate School (alleged presence of asbestos) plus adverse effect on properties in Church Grove caused by heavy lorries driving on soil of poor load bearing capacity, and
- Proposals are not the most beneficial use of the site in economic terms and they land should be sold for redevelopment to provide “mainstream “ residential accommodation.

Comments appertaining to the Proposed use of the Laurence House Lorry Park:

- Site not suitable for proposed use because of its close proximity to main roads, Council offices, hostels and nursing homes,
- Concerns about adverse effect on Travellers from noise, pollution, overlooking and night time light pollution,
- Concerns over safety of children because heavy traffic in area plus difficult journey for them to School,
- Inappropriate use of a highly visible “gateway” site in the heart of Catford Town Centre and could also prejudice by the proposed re-alignment of the South Circular,
- A general feeling that Catford is already doing its fair share on assisting disadvantaged groups and these proposals will have adverse effect on proposals to regenerate Catford Town Centre, including negative social effect and an adverse effect on local economy,
- Concerns about what will happen to the lorries, the vans belonging to the market traders and loss of parking for the theatre etc.,
- Concerns over loss of pedestrian short cut to station and adverse effect on current provision of accommodation for students in the area (lorry park is used as a dropping/collection point for students travelling by coaches), and
- The view that this is a waste of public money given that this proposed use is only temporary and in fact, given these circumstances, that the Travellers would probably not wish to move here in the first place.

#### Preliminary Conclusions

##### Watergate School/Church Grove

1. It is possible for all caravans including the widest continental caravans to gain access (with care) along Church Grove to the former Watergate School site.



2. The presumed redevelopment of the site should permit the construction of revised access geometry into the school site which will allow more manoeuvring space to be provided for the benefit of all occupiers/residents of Church Grove.
3. Following redevelopment it should also be possible to widen the carriageway so that more car parking space can be provided for the residents of Church Grove too.
4. Given the very low levels of existing traffic and the infrequent access/egress needs of caravans there is unlikely to be any significant obstruction caused by caravan movements.
5. Similarly there are unlikely to be any significant safety concerns raised by caravan movements to and from the site.

#### Laurence House Lorry Park

The Laurence House Lorry site remains in use as a lorry park and an alternative site would be required for lorry parking in line with Local Implementation Plan PEP Measure 7.2 Effective HGV Management which states that "The Council will endeavour to provide an overnight lorry park." Therefore the Council is required to re-provide this service if possible. Ideally, such a site should be close to the A205 South Circular Road and it is suggested that the Perry Vale Car Park be altered to provide this. Some improvement to the entrance ramp and re-marking of the car park itself would be needed. Should the recommendations in this report be adopted, then costings for the necessary work would be produced and reported back to Mayor & Cabinet for consideration prior to any final decisions being made.

In the longer term the existing Canadian Avenue site is important to the emerging Catford Town Centre Area Action Plan and the possible changes to the alignment of the A205. The site is likely to be required as part of any comprehensive plan for the regeneration of Catford but this is unlikely to be until 2011, at the earliest. Although plans have existed to realign the A205 for at least the past ten years, it is possible that over the next 3 years such a scheme could become a firm proposal, in order to facilitate the redevelopment of the Catford Centre, (including the Holbeach car park, the Tesco store and Milford Towers). However, it is considered unlikely that the site would be required within the next 3-4 years. It is for this reason that any proposed use of this site by Travellers' can only be considered temporary.

Novas Overtures Evaluation and Impact Assessment for new Gypsy Traveller Site in London Borough of Lewisham – 31st May 2007-06-06

Below is a summary comparison of the Laurence House and Watergate School, Church Grove sites in terms of potential impact. Impact on Travellers

Score: 0 (None) to 5 (High)

<b>Impact</b>	<b>Church Grove</b>	<b>Laurence House</b>
Traffic Noise	0	5
Traffic Air Pollution	1	5
Flooding	1	1
Light Pollution	1	5
Flytipping/envirocrime	1	1
Litter	1	4
Racist Hate Crime	1	2
Burglary on site	2	2
Burglary off site	1	1
Emergency Services Access	1	1
Education	1	5
Parking	Dependant on design	1
Proximity to water	5	0

Safer Lewisham Partnership – Crime And Safety Impact Assessment On Proposed Traveller Sites 31 May 2007-06-06

This report relates to a request by the local Regeneration Directorate of the London Borough of Lewisham for Lewisham police to undertake a crime and safety assessment on two proposed locations within the London Borough of Lewisham that are being considered as possible sites for relocation of the present Traveller Site at Thurston Road, SE13. This report is to be considered in conjunction with, and as part of a wider initial community consultation that has been undertaken by the Development unit of the Regeneration Directorate.

This report only looks at the proposed sites from a crime and safety view and should only be used as part of a wider assessment of the locations. It does not seek to promote any site, but to give details of recorded crime and basic safety information of the sites as they are at this point of time.

Safer Neighbourhood Team View Proposed Site: Lorry Park Behind Laurence House, Rushey Green, SE6

- 1) The centre of Rushey Green is extremely busy being a main bus change over point for the borough. Due to this, large groups of school children gather between 1530-1730 hrs on weekdays on their way home from school. This has resulted in numerous complaints from local residents and businesses regarding low level anti social behaviour. This is in extremely close proximity to the proposed site location.
- 2) The new proposed location within Rushey Green is a commonly used cut through for local youths and school children alike. If the site is an open site, there is potential for anti social behaviour and disorder between the school children and site residents.
- 3) There is an approved hostel in very close proximity to the proposed site.
- 4) At a recent public meeting local residents living close to the site were extremely unhappy about the proposal and the perceived lack of consultation by the council.

Proposed Site: The Old Watergate School, Church Grove, Lewisham. SE13.

1. The proposed site has only one entrance to the location due to the geography of the road layout and the backing of the site onto the Quaggy river.

2. The site has not come to notice regarding crime offences although crime offences occur along the main arterial roads, which it has in common with other main thoroughfare areas of Lewisham.

3. It would be fair to say that through general patrol feedback local community public feeling is not positive as far as using the site for such a purpose.

Present Site: Thurston Road, Lewisham, SE13.

1. The present site does not cause the local safer neighbourhood team any community issues

2. The site is not known to generate any crime.

3. The general condition of the site is one of being run down, with a number of pitches being derelict.

#### Conclusions

Previous experience of proposals to move a traveller site has shown a potential to cause community tensions. An example of this can be seen from the recent Dressington Avenue proposal, which was later abandoned. From a policing experience there is likely to be an increase of tensions within the community surrounding any application. Historically the local site at Thurston Road has not caused any increase in community tensions for a number of years when considering traveller issues.

#### Recommendation

1. That any site chosen by the local authority involves the Lewisham Police Crime Prevention officers at the design stage of any plans, so that any development can achieve a secured by design award.

2. That the local Safer Neighbourhood Team on any proposed site be involved within the consultation process.

3. That any issues of racially motivated crime or incidents that occur during the consultation be reported immediately to police.

#### Proposed Travellers Site Crime Analysis 22 May 2007 - Lewisham Police Partnership Team

This report is to assist the council decision makers in accessing the suitability of two locations on Lewisham Borough for the proposed relocation of the present travellers site currently off Thurston Road SE13.

The analysis will present a historical snapshot of crime for the year between 01/03/06 – 28/02/07 to assist in understanding the issues specific to the proposed locations.

Each assessment will focus on a 300 yard radius from the centre of the site to encompass all immediate issues. Other factors such as commercial premises, traffic and security issues will also be considered.

#### Thurston Road

This part of the report is submitted to assist with comparisons with proposed sites. The present site has been situated at this location for a number of years. The site is part of the Lewisham Town centre redevelopment area. The inner demarcation delineates the travellers' site, which displays 9 offences for the year.

This comprised of: -  
4 x Criminal Damage to MV  
1 x Common Assault  
2 x Snatch  
1 x Theft of MV  
1 x Theft from MV

Of these, no offences occurred within the site, but occurred within Thurston Road adjacent to the site.

Watergate School, Church Grove SE13

This potential relocation site is the former Watergate School and is shown as having no crime within the boundaries of the site, during the sample time frame.

Most offences in the surrounding area are generated by commercial activity. Ladywell Road from Vicars Hill to Lewisham High Street, which is densely populated by shops. Hall Road area, (marked in red aside) that shows a number of offences in this locality is mainly street crime due to the proximity of the main street and the pedestrian traffic it attracts.

This site has natural boundaries created by houses, railway tracks and the Quaggy River. Furthermore, Church Grove does not attract through traffic only local residents.

Lorry Park off Canadian Avenue

This site is currently a lorry park at the back of Lawrence House on Catford Road accessible from Canadian Avenue. Due to the immediate area being one of the busiest on the borough, figures for all crime types are considerably higher than the previous two sites, with the exception of Vehicle crime, which occurs mainly in residential areas removed from arterial roads.

The surroundings makes this site the least secure at this time, with access from both Bromley Road and Canadian Avenue. The site is very open to view from passing motorists and pedestrians, which further impacts on the site's present security.

Conclusion

Without a complete and comprehensive view of plans for the proposed sites a complete safety review cannot be completed.

Both proposed sites have access to commercial and shopping areas as well as access to good transport networks by road and rail.

The Watergate site location also presents a clear demarcation of private residential land, which in itself would discourage outsiders loitering around the area. At present the Lawrence House Car Park site although has a boundary area is presently an open site.

This report is submitted for consideration as part of the wider community consultation.

## 7. Assessment of Impact and outcomes and reducing any adverse impact

Following the scoping of the assessment and identification of potential areas for discrimination, analysis of data and research and specific consultation, the assessment checked whether, in any of the areas identified:-

- there is unlawful discrimination
- there is an adverse impact on one or more equality categories

- the service fails to promote equality of access or opportunity
- some equality categories are, or may, be excluded from service benefits
- some equality categories are disadvantaged

If an adverse impact was identified, then options for reducing that must be considered. (if it were actually unlawful, then it would need to be changed). The overall assessment is that the proposed relocation does not discriminate and no adverse equality impacts have been identified. The Site Condition Survey of Thurston Road found that “The site as it is now is not an ideal environment to live and work in. It is in the midst of industrial surroundings with no scope for improvement in terms of environmental and social issues for the residents.” And, consultation with Travellers has revealed that the residents understand that their current site is needed for redevelopment.

Therefore the key issues that have emerged out of this assessment are:

- The current Traveller site at Thurston road is not fit for purpose and the Travellers have to be relocated.
- The Travellers understand and accept the need for relocation
- Strategic Development in line with government legislation and good practice are endeavouring to relocate the Travellers to a suitable environment and accommodation, including consulting with both the Traveller and settled community about the relocation
- The settled communities of the proposed relocations have preconceptions about Travellers that may lead to tensions between these communities – therefore work needs to be done around promoting positive and harmonious community relations
- The relocation process will have to take into account the needs and safety of women and young children
- Accommodation at the agreed relocation site will have to cater for the needs of the disabled members of the Traveller family
- The religious needs of the Traveller family will need to be accommodated.
- There is a need to address the wider issues of Housing Traveller communities The relocation process has also met the requirements of: The Housing Act 2004:

“Local authorities are bound by a statutory duty under section 225(1) of the Housing Act 2004 to assess the accommodation needs of all ethnic groups, including Gypsies and Irish Travellers. This should help authorities to build a clearer picture of the way Gypsies and Irish Travellers have been marginalised in terms of public services, and develop more inclusive and responsive policies and services.”

The Royal Town Planning Institute Planning For Gypsies and Travellers Good Practice Guide Note 4

“As the object of the Development Planning Document (DPD) is to identify and allocate sites for a specific number of ‘pitches’ or units of Gypsy and Traveller accommodation, a pragmatic approach is to move direct to identification of a range of potentially suitable sites in consultation with Gypsy and Traveller communities.”

The Office of the Deputy Prime Ministers Circular on Site Planning

“to help to avoid gypsies and travellers becoming homeless through eviction from unauthorised sites without an alternative to move to”.

It is noted however, that the consultation with residents of the proposed relocations sites and, the safer Lewisham partnership, that this proposal to move the traveller site has shown a potential to cause community tensions. Very often these tensions are fuelled by negative stereotypical attitudes, toward Gypsies and Travellers. Therefore it is vital that the relocation process incorporates work on promoting good race relations. It is recommended that this be done together in partnership, as members of 'multi-agency forums', where representatives from both the statutory and community sectors – local authorities, the police, local racial equality organisations, and the media - as well as Gypsies and Irish Travellers themselves, can discuss their concerns and seek to address them.

Consequently, there are real opportunities now and in the future to take actions which will ensure better access to services for the Travellers and, to ensure that Lewisham's services make a real contribution toward promoting equal opportunities for all through positive and actioned community cohesion work.

A summary of the issues considered in reaching this conclusion, and actions to be taken for the future are set out below.

Issue of possible concern	Equalities categories it will potentially impact on	Action taken/to be taken to reduce adverse effect
Adaptations to new properties	Disability	All properties will be built to lifetime Homes Standard. Assessment of individual need will also be carried out and adaptations carried out as necessary
Work to be done around issues of promoting positive community relations	Race	<ul style="list-style-type: none"> <li>• Tap into initiatives that drive community cohesion. Liaise with the Policy and Partnerships Unit</li> <li>• Utilise forums and discussion panels (such as the Local Strategic Partnership) to overcome</li> </ul>
		<ul style="list-style-type: none"> <li>barriers to cohesion.</li> <li>• Work more effectively with community groups including Race Equality Action Lewisham (REAL) and the Irish Centre.</li> </ul>

There is a need for ongoing support to the Travellers through out the remainder of the relocation process	Race/Age/Disability	Two Officers from Strategic Development will continue to provide support.
There is a need to develop monitoring procedures that includes the Traveller community	Race/Age/Disability	Liaise with Lewisham Homes Service Improvement Team in order to add Gypsy and Traveller Category to Tenancy Profiling
Address the wider issues of Housing Traveller Communities.	Race	<p>Supporting People services could benefit Travellers, including the difficulties that this group can experience making the transition to living in a house, which can often lead to the breakdown of the tenancy.</p> <p>Service priorities identified are:</p> <ul style="list-style-type: none"> <li>• widening floating support services to include housed Traveller households</li> <li>• ensure that all support services are accessible to Travellers with support needs</li> <li>• carry out a needs assessment for this group in line with the ODPM guidance</li> </ul> <p>The Council is currently undertaking an assessment of needs for Gypsy and Traveller accommodation in partnership with other London Boroughs as required in the Housing Act 2004. The Council will be developing a strategy addressing the need arising from the accommodation assessment either through public or private provision.</p>

## 8. Formal Agreement

This EIA will be an appendix to the report to Mayor and Cabinet on 20th June 2007 which sets out the results of the consultation exercise and recommends a site for relocation.

## 9. Publication of Results

Results of the assessment will be included in the Council's annual equalities report. They will also be reported to the Safer Stronger Communities Select Committee which will be advised :-

- How the likely impact was assessed
- The information used
- The consultation carried out and summary of results
- The results of the impact assessment
- Policy changes made/to be made as a result of the assessment

- What will happen next

**Sources:**

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