



RESPONSE TO THE DRAFT LONDON PLAN 2026

The Spatial Development Strategy for Greater London

**Consultation response submitted by
THE TRAVELLER MOVEMENT**

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The Traveller Movement is a registered UK charity promoting the inclusion and community engagement of Romani (Gypsy), Roma and Irish Traveller communities.

info@travellermovement.org.uk | www.travellermovement.org.uk

1. Introduction

The Traveller Movement is a registered UK charity promoting the inclusion and community engagement of Romani (Gypsy), Roma and Irish Traveller communities. We work to empower these communities to advocate for the full implementation of their human rights, and we produce research, deliver programmes and advise public bodies across London and the UK. This response is informed by our recent London-based research, including *Towards Inclusion* (2025), a survey documenting the lived experience of Romani (Gypsy) and Irish Traveller communities in the Royal Borough of Kensington and Chelsea (RBKC), and our pan-London evaluation of borough Equality, Diversity and Inclusion (EDI) practice (2026), produced through the Propel Partnership.¹

The London Plan is the spatial expression of the Mayor's strategies and will govern development in the capital until 2046-47. For Romani (Gypsy), Roma and Irish Traveller Londoners - communities with among the worst outcomes of any ethnic groups in England across health, education, employment and housing - this Plan is arguably the single most important document of the decade.² We strongly welcome the draft Plan's explicit inclusion of Gypsy and Traveller accommodation within the Homes and Neighbourhoods chapter and the framing of pitch targets as minima. However, a plan is measured in pitches delivered, not policies drafted. This response sets out where the draft must be strengthened if it is to leave a lasting legacy for these communities, and we frame our comments in planning terms, as the Plan is a regional spatial strategy.

2. Summary of recommendations

- **R1.** Re-base Policy HN4 on sound evidence: treat the London GTANA targets (Tables 3.4 and 3.5) as interim minima only, commission a corrected and co-produced assessment of need, and put in place an Annual Monitoring Report (AMR) trigger for upward revision.
- **R2.** Make HN4 A(2) ('culturally suitable accommodation') specific: name the typologies intended, cite borough delivery examples, and address provision for those outside the PPTS planning definition.
- **R3.** Add an environmental health caveat to HN4 A(4) so that intensification within or adjacent to existing sites is sought only where sites meet air quality, pollution and safety standards; where they do not, require remediation or decant-and-replace.
- **R4.** Retain and celebrate HN4 A(5) (pitches within large-scale residential and mixed-use allocations) and support it with GLA guidance, model Development Orders and inclusion within Brownfield First Opportunity Area visions.
- **R5.** Approach transit sites and negotiated stopping (HN4 B) on a demonstrably needs-led, sub-regional basis, with permanent pitch provision taking precedence and a proper evaluation framework.
- **R6.** Restore the previous Plan's sequencing safeguard so that replacement pitches are available before families are displaced by development, reinforcing HN4 D.
- **R7.** Equip the Mayor with delivery levers ('sticks'): pitch-delivery KPIs in Annex A, monitoring through AMR and the General Conformity process, conditions on Mayoral funding streams, and Mayoral Development/LDO powers applied to Traveller sites.
- **R8.** Require borough Gypsy and Traveller Health Needs Assessments and ethnic data disaggregation as part of plan conformity and Annex F infrastructure planning.
- **R9.** Give economic inclusion of Romani (Gypsy), Roma and Irish Traveller communities explicit prominence, linked to GLE8 (Access to employment and skills) and the London Growth Plan.

¹ The Traveller Movement, *Towards Inclusion: A survey documenting the lived experience of Romani (Gypsy) and Irish Traveller communities in the RBKC* (December 2025), https://wp-main.travellermovement.org.uk/wp-content/uploads/2026/01/TowardsInclusion_web.pdf; The Traveller Movement, *Pan-London Evaluation of Equality, Diversity and Inclusion practice* (February 2026), https://wp-main.travellermovement.org.uk/wp-content/uploads/2026/02/TM_EDI_v2-1.pdf

² House of Commons Women and Equalities Committee, *Tackling inequalities faced by Gypsy, Roma and Traveller communities*, HC 360 (2019), <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/360.pdf>

3. Policy HN4 and the contested evidence base

Plan-making provision A(1) requires local planning authorities (LPAs) to 'adopt the targets set out in Table 3.4 and Table 3.5 as a minimum'. Those minima - 876 permanent pitches and 83 Travelling Showpeople plots over 2027/28–2036/37 - derive from the Mayor-commissioned London Gypsy and Traveller Accommodation Needs Assessment (GTANA), produced by RRR Consultancy and published in November 2025.³ The sector's position is that this evidence base is fundamentally flawed and is contested at the level of methodology, engagement and outputs.

As one concrete example: the Traveller Movement's *Towards Inclusion* research in RBKC identified a need for 31 additional pitches over the next 5–10 years. The London GTANA identifies a need for zero additional pitches in RBKC. None of the residents of Stable Way that we surveyed reported having had any conversation with, or completed any survey for, the GTANA consultants. These anomalies are not unique: London Gypsies and Travellers (LGT) - which, alongside Peabody Traveller Employment League, Roma Support Group and Southwark Travellers' Action Group, asked for its name to be removed from the report amid concerns that its methodology was not signed off by community experts - assesses London-wide need at closer to 2,000 pitches.⁴

In planning terms, this matters profoundly. Planning policy for traveller sites requires pitch requirements to be based on a robust, up-to-date assessment of need⁵; a spatial strategy predicated on contested evidence risks failure at examination and, far worse, a further generation of under-provision. We therefore ask that: (i) the targets in Tables 3.4 and 3.5 are expressly identified as interim minima, subject to upward revision through the AMR as corrected evidence emerges; (ii) the GLA commissions a corrected, co-produced reassessment of London-wide need, building on the LGT-backed 'Who's counting? We are' community-led enumeration work; (iii) the GLA publishes a model GTANA methodology and a pan-London waiting list protocol, so that hidden and cross-border need is captured consistently; and (iv) boroughs are required to refresh their own GTANAs at least every five years, notwithstanding proposed changes to national policy, given the mobility and demographic growth of these communities.

4. HN4 plan-making detail

4.1 Culturally suitable accommodation (A(2))

Provision A(2) states that LPAs should 'make provision for other types of culturally suitable accommodation where there is a need'. This is welcome but too vague to be deliverable or enforceable. Paragraph 3.62 helpfully signals what such provision might look like - 'a combination of pitches and bricks and mortar homes on the same site or group housing to accommodate extended families' - and the policy should say this in the policy itself, with named typologies: group and extended-family housing; chalet or bungalow-style dwellings suitable for older and disabled residents; and mixed pitches-and-housing schemes. Hackney's long experience of permanent site provision - including the proposed nine-pitch site on TfL land supported by the London Legacy Development Corporation - and the innovative typologies in national and sector design guidance (Designing Gypsy and Traveller Sites; The Modern Nomad) provide ready models.⁶ The policy

³ GLA, London Gypsy and Traveller Accommodation Needs Assessment, RRR Consultancy (November 2025), <https://www.kingston.gov.uk/sites/default/files/2026-07/London%20GTANA%20Report%20November%202025.pdf>

⁴ The Traveller Movement, *Towards Inclusion* (December 2025), *ibid.*; Travellers Times, 'Flawed London': Traveller charity condemns Mayor's new plans for traveller pitches (15 July 2025), <https://www.travellerstimes.org.uk/news/2025/07/flawed-london-traveller-charity-condemns-mayors-new-plans-traveller-pitches>; London Gypsies and Travellers, Signs of improvement in the Draft London Plan? (17 July 2026), <https://www.londongypsiesandtravellers.org.uk/news/2026/07/17/signs-of-improvement-in-the-draft-london-plan/>

⁵ MHCLG, Planning policy for traveller sites (PPTS), most recently updated August 2026, <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

⁶ DCLG, Designing Gypsy and Traveller Sites (2008), <https://assets.publishing.service.gov.uk/media/5a79e68040f0b670a8026416/designinggypsiesites.pdf>; Rural Office for Architecture, *The Modern Nomad: A design guide for Romani Gypsy, Roma and Irish Traveller communities* (2025), <https://movingforchange.org.uk/wp-content/uploads/2025/04/GRT-Design-Guide@300dpi.pdf>; LGT, Mayor petitioned for new Hackney site (2019), <https://www.londongypsiesandtravellers.org.uk/news/2019/11/18/mayor-petitioned-for-new-hackney-site/>

should also address provision for those who fall outside the PPTS planning definition - for whom culturally suitable accommodation remains, as the Equality and Human Rights Commission found, a postcode lottery.⁷

4.2 Extra capacity within or adjacent to existing sites (A(4))

Identifying 'areas of potential extra capacity within or adjacent to existing sites' is a sensible route to expanding provision - but only with an environmental health caveat. Research into environmental racism has found that Gypsy and Traveller sites in England are disproportionately located close to major sources of pollution: most sites are within 100 metres of major pollutants, and one in ten within 100 metres of a railway, motorway or dual carriageway.⁸ In London, the Lynton Close site in Brent stands directly beside a cement works: residents endure dust, noise and air quality impacts, and Brent Council's own Cabinet papers record serious overcrowding and fire-safety risks at the site.⁹ We recommend the Plan require that intensification is pursued where the existing site is in an environmentally acceptable location; where it is not, remediation or decant-and-replace should be required first, consistent with policies GHR10 (Air quality) and GHR5 (Flood risk and drainage), and with the environmental justice principles that underpin the Plan's Good Growth objectives.

4.3 Pitches within large-scale residential and mixed-use allocations (A(5))

We strongly welcome A(5): providing pitches and culturally suitable accommodation 'as part of large scale residential and mixed-use allocations and regeneration proposals' is precisely the kind of mainstreaming the sector has long advocated, and it anticipates the direction of national planning reform. Long-standing examples demonstrate that embedded provision integrates successfully: in Hull, ten pitches were delivered in the 1970s within a wider bricks-and-mortar development (Newington Street/Hawthorne Avenue); despite initial resistance, the site is now fully integrated, with settled and Traveller families living in relative harmony five decades on - an example cited consistently by our members and sector partners. Chartered Institute of Housing research likewise shows that sites planned as part of mainstream development, with good design and management, command broad support.¹⁰ To make this real, the GLA should: issue guidance encouraging inclusion of pitches in Opportunity Area frameworks and town centre masterplans; confirm how small site schemes including pitches interact with the Threshold Approach in HN3 so that pitch delivery is not inadvertently penalised; and promote Local Development Orders and the London Small Site Design Code as delivery tools for small-scale site intensification.

4.4 Transit sites and negotiated stopping (B)

Requiring LPAs to 'allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping' may be welcome in principle - it is consistent with a tradition of nomadism and with the Plan's inclusive intent - but the evidence for its scale and location needs interrogation before boroughs commit land. The London GTANA reports that surveyed households indicated a preference for negotiated stopping; Enfield's GTANA found 86% of surveyed households wanted transit provision, and negotiated stopping in Leeds has measurably reduced unauthorised encampments and enforcement costs.¹¹ However, in the Traveller Movement's recent research in RBKC and Brent, no families identified transit or negotiated stopping provision as a requirement; their overwhelming priority was permanent, decently located pitches to relieve

⁷ EHRC, Gypsy and Traveller sites: the impact of the revised definition (2019), https://www.equalityhumanrights.com/sites/default/files/190909_gypsy_and_traveller_sites_-_impact_of_the_revised_definition_-_final.pdf

⁸ Bloch, A and Quarmby, K: Environmental racism, segregation and discrimination: Gypsy and Traveller sites in Great Britain (2024)

⁹ K. Quarmby, 'The Hidden Social Housing Scandal: Exposing the Conditions of Britain's Gypsy and Traveller Sites', Byline Times (21 February 2023), <https://bylinetimes.com/2023/02/21/the-hidden-social-housing-scandal-exposing-the-conditions-of-britains-gypsy-and-traveller-sites/>; Brent Council Cabinet decision, Gypsy and Traveller Site Acquisition and Lynton Close (9 September 2025), <https://democracy.brent.gov.uk/ieDecisionDetails.aspx?AllId=74559>

¹⁰ CIH, Managing and delivering Gypsy and Traveller sites: what local authorities need to know (2016), <https://cih.org/media/kvedx2vi/gypsytravellersitesdec16.pdf>

¹¹ RRR Consultancy, London GTANA (November 2025), *ibid.*; arc4, Enfield Gypsy and Traveller Accommodation Needs Assessment (2024), https://www.enfield.gov.uk/_data/assets/pdf_file/0021/63417/Gypsy-and-traveller-accommodation-needs-assessment-Planning.pdf; London School of Architecture/TfL-commissioned research, Assessing the Potential of Negotiated Stopping in London (2016), https://www.london.gov.uk/sites/default/files/ad_36_negotiated_stopping_report_final_jan16.pdf

severe overcrowding. Site managers across the UK also report that temporary sites are significantly harder and costlier to manage well. There is therefore a real risk that transit provision substitutes for, and is used to justify deferring, permanent provision - for example, a borough delivering a transit site while existing permanent-site families remain overcrowded. We recommend the Plan: (i) requires a demonstrated, current local need before transit provision is allocated; (ii) locates provision sub-regionally rather than necessarily in every borough; (iii) states that permanent pitch delivery takes precedence; and (iv) requires an evaluation framework so the Mayor can test whether provision is working - noting that negotiated stopping is best deployed alongside, not instead of, a lawful supply of pitches, as the Court of Appeal's 2025 'clean hands' judgment and Welsh Government guidance both underline.¹²

4.5 Protection against loss (D)

We strongly welcome D: proposals entailing the loss of pitches or plots 'should secure replacement provision that is equivalent or better in terms of size, quality and suitability of location'. This will prevent further erosion of a precious and shrinking stock. We ask the Plan to go one step further and restore the sequencing safeguard contained in the previous London Plan - that replacement pitches should be available before families are displaced - which appears to have been dropped. The consequences of weak sequencing are not theoretical: Lewisham families waited 17 years for a replacement site after their site closed in 2009 for a bus depot, and national policy already recognises that applicants for major development should identify and provide alternative sites where a traveller community must relocate.¹³

5. Delivery: from carrots to sticks

The draft Plan contains many 'carrots' - encouragement, expectation and exhortation - but few 'sticks'. Paragraph 3.66 itself acknowledges that 'past delivery has been slow'. Our pan-London EDI evaluation found that only 22% of surveyed boroughs are delivering new pitches, and 62.5% of borough EDI strategies make no reference to Gypsy, Roma and Traveller communities at all.¹⁴ If the Mayor is serious about delivery, the Plan should equip him with levers:

- Annex A Key Performance Indicators should include pitch and plot delivery per LPA, reported annually through the AMR, alongside housing targets.
- General Conformity scrutiny of new local plans should test robustly whether pitch allocations, GTANA refresh and site safeguarding are being progressed.
- Mayoral funding streams - including the London Social and Affordable Homes Programme 2026-36 and the City Hall Developer Investment Fund - should require, as a condition, that recipient boroughs maintain an up-to-date GTANA, a waiting list and a delivery programme, and fund pitches as affordable housing.
- The 'range of tools such as Local and Mayoral Development Orders' heralded at paragraph 1.13 should be expressly applied to Traveller sites, including on surplus GLA-group and TfL land; the protracted history of the proposed TfL-land site in Hackney shows what happens when land assembly lacks a delivery mandate.¹⁵

There is strong UK precedent for exactly this kind of concerted, metro-regional delivery. Greater Manchester Combined Authority commissioned a single Gypsy and Traveller Accommodation Assessment across its ten districts (2024), with collective delivery, redistribution of need and five-yearly updates - a model directly transferable to the GLA. Within London, Enfield has operationalised cultural need through a published site selection methodology; Lewisham is delivering the capital's first brand-new site in over thirty years (seven pitches at Catford, due to open in 2027); and Cheshire's sub-regional partnership demonstrated that

¹² Leeds GATE, Leeds' approach to unauthorised encampment vindicated by Court of Appeal judgement (2025), <https://leedsgate.co.uk/news-and-stories/news/leeds-approach-to-unauthorised-encampment-vindicated-by-court-of-appeal-judgement/>; Welsh Government, Guidance on managing unauthorised encampments (2026), <https://www.gov.wales/guidance-managing-unauthorised-encampments-step-step-guide.html>

¹³ LGT, Signs of improvement in the Draft London Plan? (17 July 2026), *ibid.*; PPTS, Policy G: Major development projects, *ibid.*

¹⁴ The Traveller Movement, Pan-London Evaluation of EDI practice (February 2026), *ibid.*

¹⁵ LGT, Mayor petitioned for new Hackney site (2019), *ibid.*

coordinated delivery both increases pitches and reduces unauthorised encampments by over half. Haringey's strategic approach to site development is also cited in our EDI evaluation as borough good practice.¹⁶

6. Health: duties without data

Paragraph 1.4 records that in preparing the Plan the Mayor has had regard to 'promoting Londoners' health and reducing health inequality'. Yet Gypsy, Roma and Traveller health needs in London are largely invisible. Our Propel Partnership evaluation found that only 50% of surveyed boroughs had conducted a Gypsy and Traveller Health Needs Assessment, and only 50% disaggregated data to a level that makes these communities visible at all. Without the baseline, the Plan cannot deliver good health outcomes for these communities - a point reinforced nationally by the inclusion of these communities within NHS England's Core20PLUS5 approach and by parliamentary findings of a 10-12 year life expectancy gap.¹⁷ We ask that the Plan and its implementation require: (i) borough completion of Gypsy and Traveller Health Needs Assessments and routine ethnic data disaggregation, tested through local plan conformity; (ii) reference to GRT health infrastructure within Annex F (public service infrastructure), so that GP provision, health visiting and maternity services are planned alongside new site allocations - consistent with HN4 F, which already requires new sites to be well-connected to health care; and (iii) GLA/NHS London commissioning of community-led health advocacy and inclusion services, following the proven models of Hackney's Community Health Inclusion Programme and Brighton & Hove's National Gypsy and Traveller Health Inclusion Project.¹⁸

7. Economic inclusion

The Plan is animated by economic growth and inclusion, yet Romani (Gypsy), Roma and Irish Traveller communities are virtually absent from it. This is a striking omission given the evidence: these communities have the lowest economic activity rate of any ethnic group (47%), young people aged 16-21 are nearly five times more likely to be economically inactive than their peers (23.8% versus 5.0%), Gypsy, Roma and Irish Traveller pupils are the least likely of any ethnic group to remain in education post-16, and adults are over five times more likely to have never worked or to be long-term unemployed.¹⁹ Employment support is routinely inaccessible because it is address-based, failing both site residents and those in bricks and mortar. London could lead the UK by becoming the first spatial strategy to name the economic inclusion of these communities: we ask that GLE8 (Access to employment and skills) and its supporting text explicitly reference Romani (Gypsy), Roma and Irish Traveller residents - including targeted pre-apprenticeship and apprenticeship pathways, liaison-officer support (a proven local authority model), and engagement of the Traveller economy and self-employment - and that the approach is aligned with the London Growth Plan.²⁰

¹⁶ GMCA, Gypsy and Traveller Accommodation Assessment (2024), <https://www.greatermanchester-ca.gov.uk/media/jotblsr1/gmca-gtaa-final-report-08-11-24-accessible-for-publishing.pdf>; Enfield Council, Gypsy and Traveller Site Selection Methodology, https://www.enfield.gov.uk/_data/assets/pdf_file/0025/45457/traveller-site-selection-methodology-Planning.pdf; LGT news, 'At last, a new London site' (June 2026), <https://www.londongypsiesandtravellers.org.uk/news/>; LGIU, The good, the bad and the ugly of site provision for Gypsy, Roma and Traveller people (November 2023), <https://lgiu.org/the-good-bad-and-ugly-of-site-provisions-for-gypsy-roma-and-traveller-people/>

¹⁷ The Traveller Movement, Pan-London Evaluation of EDI practice (February 2026), *ibid.*; WEC HC 360 (2019), *ibid.*

¹⁸ The Traveller Movement, Pan-London Evaluation of EDI practice (February 2026), *ibid.*; Friends, Families and Travellers, National Gypsy and Traveller Health Inclusion Project: Brighton & Hove (2024), https://www.gypsy-traveller.org/wp-content/uploads/2025/03/The-National-Gypsy-and-Traveller-Inclusion-Health_FINAL-2.pdf

¹⁹ ONS, Ethnicity facts and figures: Gypsy, Roma and Irish Traveller summaries, <https://www.ethnicity-facts-figures.service.gov.uk/summaries/gypsy-roma-irish-traveller/>; T. Burchardt, LSE CASE Paper 208, Movements in and out of poverty and place (2018), <https://sticerd.lse.ac.uk/dps/case/cp/casepaper208.pdf>; FFT, Education inequalities faced by Gypsies, Roma and Travellers in England (November 2023), <https://www.gypsy-traveller.org/wp-content/uploads/2025/03/Education-inequalities-faced-by-Gypsies-Roma-and-Travellers-in-England-briefing-2.pdf>; HEPI, Gypsies, Roma and Travellers in UK higher education (2022), <https://www.hepi.ac.uk/wp-content/uploads/2022/07/Gypsies-Roma-and-Travellers.pdf>

²⁰ Roads to Success: research into the employment support needs of Gypsies and Travellers (2011), https://bnu.repository.guildhe.ac.uk/id/eprint/10002/1/Greenfields%2C%20Margaret%20roads_to_success%20%282%29.pdf

8. The wider response to this consultation

Our response aligns with a growing body of commentary on this iteration of the draft Plan (published 27 July 2026; consultation closing 15 October 2026). London Gypsies and Travellers, while noting 'signs of improvement', warns that the GTANA-derived targets set the bar far too low, urges the restoration of the pitch-before-displacement safeguard and calls for at least one new site per borough. The Just Space network and the London Tenants Federation have published responses foregrounding affordability and delivery realism, and CPRE London has issued a template response to its supporters. YIMBY Alliance has analysed the draft's development-management framework for homes, and private-sector planning commentary (for example DHA Planning and Urbanist Architecture) has highlighted evidence-timing and undefined-term risks to delivery. Across these otherwise diverse responses, a consistent theme emerges - of which our recommendations are part: the Plan's ambitions will only be realised through stronger evidence, firmer monitoring and genuine delivery levers.²¹

9. Conclusion

This Plan will shape London to 2046-47. If Romani (Gypsy), Roma and Irish Traveller communities are written into it - through honest evidence, specific policy, environmental justice, enforceable delivery and visible commitments on health and economic inclusion - the Mayor will leave a legacy of which London can be proud, and London will have shown the rest of the UK how a great city plans for all its people. If they are left as a passing reference in a single policy, the Plan will repeat the errors of the past twenty years. The Traveller Movement stands ready to work with the GLA, the boroughs and the sector to co-produce the corrected evidence and the delivery programme this response calls for. Nothing about us, without us.

²¹ LGT (17 July 2026), *ibid.*; Just Space, Responses to the 2026 consultation, <https://justspace.org.uk/responses-2026/>; CPRE London, Your response to the Draft London Plan, <https://www.cprelondon.org.uk/news/your-response-to-the-draft-london-plan/>; YIMBY Alliance, The Draft London Plan: what has changed for building homes? (17 July 2026), <https://yimbyalliance.org/2026/07/17/the-draft-london-plan-what-has-changed-for-building-homes/>; DHA Planning, Draft London Plan 2026: what you need to know (July 2026), <https://dhaplanning.co.uk/2026/07/30/draft-london-plan-2026-what-you-need-to-know/>; Urbanist Architecture, The Draft London Plan 2026: a consultation-ready review (July 2026), <https://urbanistarchitecture.co.uk/planning-blog/draft-london-plan-2026/>