

Comment on Core Strategy – submission version
Policy 2 (Gypsies and Travellers)
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to planning.policy@lewisham.gov.uk

London Gypsy and Traveller Unit
6 Westgate Street
London E8 3RN
020 8533 2002
www.lgtu.org.uk
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The Core Strategy Policy 2 (Gypsies and Travellers) is unsound in the following respects:

- 1 It is not justified by a clearly stated evidence base. The policy should make it absolutely clear that the target given in the London Plan for new pitches is in addition to the new pitches needed to replace the Thurston Road Site.
➔ amend para 1 of CSP2 accordingly.
- 2 It is not effectively monitored: The Monitoring Framework in Appendix 6 (p174) gives “Net additional pitches” as both the indicator and the target.
➔ The target should read
20 new pitches (including those necessary to replace Thurston Road) by 2017.
- 3 Criteria d. has no clear meaning. What are “The activities” referred to?
➔ delete criteria d.
- 4 The criteria, generally, are in danger of falling foul of the guidance in Appendix C para 7 of ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*. They are, in sum, so extensive as to be virtually impossible to comply with.
➔ rewrite the criteria as follows:
 - a. *They have reasonable access to.....*
 - b. *They are safe and have reasonably convenient access.....*
 - c. Delete “and servicing of vehicles”.
 - d. (if kept) *..do not have unacceptable impact*
 - e. stet
 - f. *They are designed to a standard that is acceptable to the HCA for urban sites and bearing in mind the need to facilitate the integration of*
....