

Appendix 2

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.¹

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

¹ Travellers – Update and Site Search Findings Report July 2005

		<p>(RRAA). This recognition is aimed 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.</p> <p>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.</p>
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 the 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 2005-210

“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 44890m²
- The site could be provided in one location or two separate locations but minimum management size would be preferable at 10 pitches
- Reprovision 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 crossed 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 16th 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)

<i>Impact</i>	Church Grove	Laurence House
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 Assesment 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 equalities 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"> • Tap into initiatives that drive community cohesion. Liaise with the Policy and Partnerships Unit • Utilise forums and discussion panels (such as the Local Strategic Partnership) to overcome

		<p>barriers to cohesion.</p> <ul style="list-style-type: none"> • Work more effectively with community groups including Race Equality Action Lewisham (REAL) and the Irish Centre.
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"> • widening floating support services to include housed Traveller households • ensure that all support services are accessible to Travellers with support needs • carry out a needs assessment for this group in line with the ODPM guidance <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

10. Monitoring