

APPENDIX C

Southwark Housing Strategy 2020 engagement feedback report

1. The Southwark Housing Strategy 2020 continues the broad direction set in the 2015 housing strategy to 2043, and therefore the consultation on the housing strategy did not start from a blank canvas. The consultation focused on whether responders agreed with the proposed changes to the principles and commitments, and whether there were any particular gaps. This appendix includes a summary of the comments made during the consultation on the housing strategy, which have shaped the final strategy. We are extremely grateful for all the comments received. The comments have been grouped below using the final revised principles of the housing strategy.
2. The council has consulted on the Housing Strategy 2020 for over a year. The consultation started with a half day stakeholder session on the 27 June 2019 to get wider views on the update of the housing strategy. This provided a lot of really useful feedback. These comments informed a consultation draft of the new housing strategy.
3. The council conducted a wider public consultation on the housing strategy consultation draft between January 2020 to the end of May 2020. The start of the consultation had been delayed due to purdah for the 2019 general election, and the end deadline was extended to the end of May due to the Covid19 pandemic. The consultation included putting the consultation draft on the council's online consultation hub and inviting comments, and offering to attend meetings of SOUHAG (Southwark Housing Association Group), Tenant Council, Homeowner Council, STMOC, SGTO and the Futures Steering Board. Due to lockdown restrictions officers only managed to attend the following groups before the lockdown:
 - The Futures Steering Board
 - SGTO
 - Tenant Council
 - STMOC (as an information item)
 - Forum for Equalities and Human Rights
 - Homelessness Forum
4. The other groups were sent the consultation details but officers were not asked to attend the meetings, or no meetings took place in the timeframe due to the pandemic.
5. There was a lot of very useful feedback at the meetings and a limited response to the online consultation. Of those who did respond, and at the meetings attended by officers there was a high level of agreement with the proposed changes as detailed below but a number of other useful other comments were received.
6. Following the initial public consultation the council updated the consultation draft to respond to the comments received and to include consideration of the impacts

of the Covid19 pandemic. As the council had already conducted a lengthy consultation, the council decided to do a short consultation with key stakeholders on these changes over August 2020, to give partners the opportunity to raise further comments regarding the potential impacts of the Covid19 pandemic if they wished. The document was sent to housing associations via the SOUHAG mailing lists, TRA chairs, Southwark Tenant Management Organisation Committee (STMOC), SGTO, the homelessness forum and the forum for Equalities and Human Rights. There was very limited feedback but the housing strategy was updated to reflect the comments received, such as to provide more information around the challenges with households with no recourse to public funds (NRPF).

7. While we only received 12 responses via the consultation hub and a few email responses via the housing strategy mailbox we received a lot of comments in person at the meetings we attended and the half day stakeholder session. Most people seemed to agree with the proposed changes to the housing strategy, but people raised many issues such as around climate change and provision for gypsy and travellers. A summary of the comments are included below. These are not quoted verbatim as otherwise this document would be very long. Some respondents provided useful lengthy responses about how the housing strategy aligns with their strategies, such as the response from Optivo. We have only kept the comments here which were specific to the housing strategy.

Results of the online consultation

8. The online consultation focused on whether respondents agreed or disagreed with the proposed changes to the principles and commitments. We were not starting from a blank canvass as the Housing Strategy 2020 builds on the 2015 strategy which was to 2043. The consultation set out how these principles and commitments had changed, which was mainly to make them shorter and more concise, to avoid duplication across principles and to group some of the commitments via tenure in the second principle on housing quality. The following table sets out of those who responded to the online consultation, how many agreed, partly agreed or disagreed with the proposed changes to the principles and commitments. There was broad agreement.

	Agree	Partly agree	Disagree	Don't know	Not answered
Q1. Principle 1 – Principle	75% - 9	8% - 1	8%-1	0%-0	8%-1
Q3. Principle 1 – Commitments	58% - 7	17% - 2	8%-1	0%-0	16%-2
Q5. Principle 2 - Principle	75% - 9	8% - 1	8%-1	0%-0	8%-1
Q7. Principle 2 - Commitments	75% - 9	8% - 1	8%-1	0%-0	8%-1
Q9. Principle 3 - Principle	67% - 8	17% - 2	8%-1	0%-0	8%-1
Q11. Principle 3 - Commitments	75% - 9	8% - 1	8%-1	0%-0	8%-1
Q13. Principle 4 - Principle	67% - 8	17% - 2	8%-1	0%-0	8%-1
Q15. Principle 4 - Commitments	58% - 7	25% - 3	8%-1	0%-0	8%-1

Other comments grouped by the revised principles of the housing strategy following the consultation

Principle 1. Increasing the supply of genuinely affordable high quality homes that meet our residents' housing needs and aspirations

Council new build

- We need to work together to identify sites for new council homes on council land and housing estates, and explore further opportunities for infill development, land redesignation and intensification, freeing up land working with landowners, and buying up stalled sites
- We need to develop a strategy (and carry out options appraisal) to explore borrowing against the HRA
- There is potential for more partnering with HAs and developers, and utilising the development capacity of the HAs sector to assist in delivering new council homes
- Expand existing council housing delivery programmes e.g. hidden homes, etc.
- Work jointly with HAs and other London councils to identify land and sites, and the necessary resources to build affordable homes
- Work on improving the local offer to residents affected by new build
- While building new homes, carry out improvements works in the local area to integrate the new homes in the existing communities
- Manage leaseholder expectations
- Where will you build 11,000 council homes – will you demolish existing buildings of 8 floors and build new buildings with 18 floors? There is a need to consider the impact on leaseholders.
- It would be good to set out in the background information how many new council homes have been built and the plan over the next 20 years.
- Lobby to change legislation to enable the council to buy land at 'brownfield' price to build social rented homes

Increasing affordable housing

- Support private developers to build affordable homes
- Maximise the supply of affordable housing completed on privately led developments (including new council homes) through s106 decisions
- Encourage HAs to maximise the supply of traditional social rented homes
- Improve communications about the types of affordable housing and associated benefits
- It would be good to have a clear definition of what London Living Rent is and what other forms of social rent is proposed
- Build affordable homes in area of need
- We would like to see a commitment to rents that are less than one-third income (as defined by the Affordable Housing Commission , but with this definition extended beyond those in work) so genuinely affordable to everyone living in the borough.
- There is no mention of the commitment to ensure developers are providing truly affordable housing.

Planning and development

- Use the planning regime to accelerate development
- Involve and include educational establishments like schools, colleges, etc. in planning neighbourhoods (including developing new educational institutions)
- Use CIL to help deliver infrastructure to support the development of areas
- Deliver a genuine mix of homes that people want to live in
- Minimise physical barriers during development between different housing tenures to encourage community cohesion
- Carry out post development engagement to improve learning - although we engage with existing communities before development, we could do a lot more after people have moved into the new developments.

Climate change

- Ensure new homes on all major developments to be zero carbon
- Should we be building new homes if there is a climate emergency – should we only be building low cost affordable housing?
- There is a need to reduce the environmental impact of new homes
- There is no link to the council's climate crisis commitments in terms of developments.

Supported housing

- Deliver additional extra care housing for older people
- Deliver a Community Hub for people with social care needs
- Improve access to DFGs, so that older people and people with disabilities who want to stay in their own home can do so
- Explore new technology to help people retain their independence at home
- Provide alternatives to residential care for adults and children with learning disabilities, physical disabilities and mental health issues so they can live independently

Vacant homes and under occupation

- Can the wording about reducing empty homes be strengthened
- Lobby to put a levy on empty properties and ring fence the money back to the council
- Use Planning to set penalty conditions around vacancy of new homes built
- Provide more incentives to encourage under occupiers to downsize
- There is a need for a clearer plan regarding older people's housing demand and tackling under occupation
- Work with housing associations more closely to turnaround and/ or access their vacant properties.
- Quicker turn around routine council voids
- Quicker turnaround of temporary accommodation voids (estates and hostels)
- Use the council homes for temporary accommodation that are 'awaiting regeneration and long term vacant.

Gypsy and travellers

- We recommend commitments under principal 1 to include, the previous Council policy:

- Safeguarding the existing four Traveller and Gypsy sites in Southwark.
- Identifying new sites for additional facilities to meet the needs of Travellers and Gypsies having regard to:
 - The need for safe access to the road network.
 - The impact on the local environment and character
 - The impact on amenity
 - The availability of essential services, such as water, sewerage and drainage and waste disposal.
 - The proximity to shops, services and community facilities.
 - The need to avoid areas at high risk of flooding.”
- To ensure that Gypsies and Travellers are given the same consideration as people with disabilities and older people (and acknowledging that members of the Gypsy and Traveller community may also be older and/or have a disability), we would also recommend an additional commitment that:
 - All new Traveller and Gypsy sites are of a high quality and have the flexibility and additional facilities to respond to people’s changing needs over time.

Other

- Work with residents to design out crime from new developments while protecting access to communal areas and facilities
- Ensuring that green spaces are valued, maintained and designed for all generations to enjoy at any time of their life journeys. Sensory gardens, parks, allotments should be more visible and identifiable to the residents , visitors and workers as can be areas of relaxation and therapeutic as many work from home, after school and mostly to relax and enjoy and life away from the busy be noisy environment.
- Optivo supports the council’s ambition to increase the supply of high-quality, genuinely affordable homes....We share the council’s belief that all new homes should be built to the highest standards of quality and design, regardless of tenure. To help us achieve this we are increasingly acting as the lead developer on schemes to give us more control over the design and delivery of new homes and enable us to build thriving, sustainable neighbourhoods with an inclusive mix of tenures. We too recognise housing associations and local authorities need to work in close partnership to solve London’s housing crisis and are glad to see the council has made good progress in increasing its own delivery despite a challenging external environment...With the Housing Revenue Account borrowing cap now lifted – something we had lobbied for with the G15 and London Councils – we are pleased the borough is now eager to do more and we are keen to explore opportunities to work together to deliver more genuinely affordable homes
- Simplify language such as terms like social rented and add a glossary at the end to describe many of the terms used
- Look at the wording and include more reference to families rather than just households, homes suitable for families, homes to stop families moving away and homes for families with children with disabilities
- STAG agrees with Principle 1 however, the specific commitments do not go far enough to achieve this outcome.

Principle 2. Demanding safer, higher quality, energy efficient homes

Private sector

Understanding rights and obligations

- There should be more communications/publicity campaigns about successful housing enforcement prosecutions in the private sector and send newsletters
- There is a need to ensure clear, easily accessible information on tenants' rights.
- Ensure that clients can access legal advice from Housing Solutions or voluntary sector.
- Work with Voluntary Community Sector more to train clients
- Develop a comprehensive signposting database
- London's Renters Union is rolling out branches and we could request for one to be set up in Southwark.
- Instead of a physical Renters Union, perhaps just have a website where tenants, landlords, council and other partners can understand their rights and responsibilities, share knowledge, and discuss issues.
- Digitalise the advice service using 'quick online wizard' to provide a quick initial advice

Licensing and accreditation

- Link up with estate agents to encourage take-up of licenses
- Digitalise the licensing/ accreditation service to quicken the process of gaining the standard
- Offer an 'enhanced package' via the estate agents
- Explore having a ratings system and/ or MOT for estate agents, management agents and/ or landlords based on quality of service and/or property.

Use of the private rented sector

- LAs and HAs can buy properties of accidental landlords, or those looking to sell due to squeeze in profits owing to removal of tax rebates, or those unable to invest to meet the licensing standard. Lease these properties (for say 5 years) with guaranteed rent and management of asset
- Through a Local Private Lettings Agency, offer guaranteed rent, housing management service, and asset management.
- The council is trying to discharge homelessness duty to the private sector so we need a lot more joint working with private landlords.
- Procurement teams need to have HHRs training to help procure suitable Temporary Accommodation properties, and act as intelligence for the Enforcement team.

Other private sector comments

- Lobby to reinstate rent controls, length of tenures, higher sanctions, etc.
- There is a need for a new survey of the private sector to understand true condition of properties in the sector

- Reduce short term lets (like Airbnb)

Social housing

Estate regeneration

- There should be no further estate demolition without a tenants ballot
- There were some individual comments about particular regenerations schemes where the responder felt the outcome had ignored the results of the consultation.

Energy efficiency and heating systems

- Strengthen the commitments around climate change by including this in the wording of the principles and commitments, and say more about how the housing strategy will contribute to tackling climate change
- Like Southwark, Optivo is redoubling its efforts to improve the quality of its existing stock...All Optivo residents can request the most up-to-date fire risk assessment for their building via our website or over the phone. Optivo is also fully behind the borough's commitment to becoming carbon neutral by 2030...Our new strategic plan sets out how we'll deliver an ambitious environmental programme over the next few years. That includes how we'll meet government's target for all social sector homes to achieve a Band C Energy Performance Certificate by 2030
- There is need to improve estate heating systems and to reduce carbon emissions (many comments at meetings concerned heating systems).
- There is need to say more about leaseholders affected by issues such as cladding

Gypsies and travellers

- We suggest the council takes a more holistic approach to the quality of Gypsy & Traveller homes that looks at fire safety as one of a range of priority issues including overcrowding, security of tenure and other health & safety issues, as well as respecting the culture, identity, ethnicity and human rights of Gypsies and Travellers. These should apply to the homes of all Gypsies and Travellers in Southwark, whether they are living on local authority pitches or in "bricks and mortar" accommodation. We suggest the commitment could be expanded to better meet the council's legal requirements and the community's needs:
 - Continuing on our improvements to our Gypsy and Traveller sites and meeting Gypsy & Traveller accommodation needs by ensuring their housing meets high quality standards and is secure, safe and of adequate size whilst also respecting the culture, identity, ethnicity and human rights of Gypsies and Travellers in Southwark.
- Southwark Legal Advice Network has produced a report that shows that issues of disrepair have increased two-fold across local authority, housing association and private rented sector housing in Southwark over the last two years. The data identifies this as disproportionately affecting Black, Asian and Minority Ethnic (BAME) residents, suggesting that it will also disproportionately affect Gypsies and

Travellers living in “bricks and mortar” housing in the borough.

- STAG agrees with principle 2 of the Southwark Housing Strategy 2020 and welcomes the majority of the commitments it contains.... We suggest the council should commit to:
 - better monitoring of repairs in the rented sector;
 - enforcement action when housing association and private landlords fail to protect tenants' health & safety and
 - an improvement in the council's own repair service to ensure no council tenant is left in unsafe, unhygienic or unhealthy accommodation.

Other

- Add text to say more about what we have learnt from the impacts of the virus such as the importance of good quality housing, how some sections of the community are more at risk of poor housing, and the increased importance of housing for keyworkers.
- Ensure the housing strategy takes account of the emerging Fire Safety Bill
- Improve quality of council properties relet

Principle 3. Promoting tenure security and social support in housing, and improving the health, wellbeing and economic resilience of residents.

Training and education

- Work with Voluntary Community Sector more to train clients
- Work with big employers to offer education

Homelessness

- Ensure that clients can access legal advice from Housing Solutions or voluntary sector
- Provide dedicated housing advice to private tenants threatened with illegal eviction
- Work with schools and colleges to better engage with young people around the realities of housing and homelessness
- Minimising HA evictions by working closely with local HAs
- Personalised Housing Plans need to be more tailored and more regularly reviewed to counter frequently changing individual circumstances
- Explore why Southwark gets higher number of homelessness presentations and learn from different techniques other similar councils are using to prevent homelessness
- It would be good to see a commitment by Southwark not to rehouse homeless families outside the Borough, unless they want to move out.
- Ensure that no one new to the streets sleeps rough for a second night, no one lives on the streets of Southwark and rough sleeping is minimised by working key partners

- Prevent rough sleeping amongst people with complex needs and mental health issues by prioritising access to Southwark's Complex Needs Advisory Panel (CNAP) and agreeing long-term housing and support requirements

Welfare reform

- Provide debt advice to particularly those affected by welfare reform changes, by working together with other agencies
- Lobby to remove the benefit cap and bedroom tax.

Supported housing and supporting vulnerable households

- Provide targeted housing management and support to council tenants with particular needs and requirements to ensure they can live as independently as possible
- Provide permanent supported accommodation for residents who may never be able to live independently
- Increase the range of housing options for vulnerable young people by jointly commissioning schemes for young people at risk of homelessness, on the edge of care and leaving care
- Improve capacity of council, named public bodies and voluntary sector services by providing induction training that ensures homeless prevention protocols are known and properly deployed, especially when designing and commissioning services for the vulnerable
- Ensure that victims of domestic abuse and their children can remain safe in their homes, either through security in their home or supporting them into accommodation
- Supported lodgings scheme - Develop a 'hotel/ guest' online system to put young people and/ or asylum seekers in empty rooms (like emergency Air BnB)
- There is a need to work together across the council to consider the impact of the pandemic on demand for older peoples housing, care homes, extra care, adaptations etc

Temporary accommodation

- It is difficult to see how in the current housing crisis Southwark will be able to reduce the levels of temporary accommodation.
- Sustain tenancies for vulnerable people in temporary accommodation
- Integrate people in (estate and hostels) TA with local community

Other

- Develop a comprehensive signposting database
- Co-locate with partners to provide advice services so that residents have a one stop shop of quick and easy access to financial advice, debt counselling and support services
- Remove Band D in housing register to manage expectations
- Change "Connecting residents to the services and support they need across health, education, training, employment and financial advice" to include social care.
- We suggest that the Housing Strategy 2020 includes a specific statement that both these principles 3 and 4 and their accompanying commitments relating to

council house tenants, also apply to those Gypsy & Travellers living on local authority sites in the borough.

- Optivo shares the council's ambition to increase security of tenure. We are no longer offering fixed term tenancies and are currently in the process of converting those issued since 2011 to assured tenancies.
- Optivo also shares the council's ambition to reduce homelessness and is working to do so across a number of fronts. 32% of our lettings across our general needs and supported housing in Southwark went to formerly homeless households in 2018/19. And to support local authorities deliver on the intentions of the Homelessness Reduction Act, we have signed up to the National Housing Federation's Commitment to Refer, which formalises the actions we'll take to refer households at risk of becoming homeless...We too are committed to being 'more than a landlord'. Our financial inclusion team is highly adept at working with residents to maximise and make the most of their incomes through help with budgeting and securing welfare benefits. Last year each household the team supported received an uplift in income of £287 on average including money saved on bills and extra benefits secured...And, recognising that employment can generate a reliable income – besides a host of other benefits – our social impact team offers personalised support to residents to access jobs and training. Last year it helped 1,122 people across our operating areas secure jobs or training, including through the Love London Working programme...Our dedicated tenancy sustainment team works with some of our more vulnerable residents to help them manage their tenancies, including tackling the issue of hoarding. And for a number of years we have provided safe and secure homes to nine vulnerable male adults with enduring mental health needs at a 24-hour supported accommodation-based housing project at New Kent Road with support provided by Look Ahead...We have recently partnered with online electrical goods store AO to refer residents to its rental service, with the aim of helping them to access appliances in a way that reduces the need for loan sharks/expensive short-term loans...We're also aware loneliness and isolation are issues experienced by a growing number of residents. We recently launched resident-led research on the issue at the House of Commons and will be working with residents to implement its recommendations

Principle 4. Empowering residents and communities to have pride and influence over their homes and neighbourhoods

Resident engagement

- There is a need to work with tenants, residents and homeowner groups to find new ways to engage so that more people can have their say
- Assign a dedicated officer to raise awareness of various external (non Southwark) funding pots and provide support during applications
- Review the training courses and their content as not high uptake of existing courses, and not enough training on strategic housing issues
- It would be good to understand how it is proposed to give greater say to tenants
- The bankrupt and corrupt existing system of gang-led TRAs controlled by a clique of rogue activists promoting their own often dubious personal agendas,

enriching themselves at public expense, discriminating against those who do not obey the souped-up pocket dictators' demands, intimidation during voting at so-called open meetings, and the exploitation of TRA facilities such as TRA Halls for use of these self-appointed rogue individuals to run their empires. Halls are a particular weak spot in the corrupt Southwark TRA system. They are being used or have been used for private gain (charging for access, sale of goods and services e.g. storage), storage of stolen goods and contraband, exclusion for those not approved by the gang leaders, the usual litany of exploitative, semi-legal and outright illegal social fascism.

- Enabling council tenants and homeowners to take greater control over their local housing services might lead to poor quality home maintenance due to concerns about how TRAs are run etc.

Communities

- Modernise community facilities as some community facilities are no longer suitable due to health and safety issues
- Map the community groups in Southwark and neighbouring boroughs for residents to maximise their full potential

Private rented sector tenants

- Provide a Welcome Pack to new private tenants
- Carry out pre-tenancy workshops for new private tenants
- Managing agents could do more to welcome new private tenants

Council tenants and leaseholders

- Provide a Welcome Pack to new council tenants
- Carry out pre-tenancy workshops for new council tenants
- Resident officers could do more to welcome new council tenants
- Provide a Welcome Pack to new leaseholders
- Carry out pre-tenancy workshops for new leaseholders
- Resident officers could do more to welcome new leaseholders
- Provide a guide which informs tenants and leaseholders what repair and improvement works they can carry out to their home.
- Review content and tone of major works letters

Housing associations

- Broaden use of SOUHAG for communicating with HAs better on issues around adaptations, key safes, target rents etc

Crime and anti-social behaviour

- There is need for more police on patrol on Brandon Estate due to three murders.
- Tenants who persist in antisocial behaviour must be dealt with, I and my downstairs neighbour are flooded several times each year by the tenant upstairs, she even collapsed my ceiling the previous tenants never cause any problems at all.

Gypsy and travellers

- STAG is keen to work with the council to ensure Gypsies and Travellers have new ways to engage and more have their say on housing / accommodation issues.
- The council should make a commitment that Gypsies and Travellers living on local authority sites in the borough should expect to receive the same levels of service and support as council house tenants. For example, support to develop the equivalent of TMOs on Gypsy and Traveller sites, a “Great Pitch Guarantee” to ensure all Gypsy and Traveller sites are clean, safe and cared for, access to sustainable community energy projects, information on their rights as pitch holders and 24 hour access to a repairs service.

Other

- Like Southwark, Optivo is committed to enabling residents to have a greater say in how services are designed and delivered. As a matter of principle, we believe it's right that residents are able to shape major decisions that affect their home and their community...Our new strategic plan has co-creation as a major theme – residents working in genuine partnership with colleagues to shape policies, re-design services and develop new projects. We'd be very happy to share our learning on this through the Southwark Housing Association Group (SOUHAG). We're also working closely with the National Housing Federation to shape its Together with Tenants initiative to rebalance the relationship between tenants and landlords...In common with the council we also share a commitment to working with residents to tackle crime and anti-social behaviour. Our specialist ASB team has been in place for many years and we pride ourselves on the high levels of satisfaction with our service....Like the council we are also prioritising digital inclusion and will be rolling out full-fibre broadband across our entire stock as part of our Digital Infrastructure Approach.

Other comments

- Optivo fully endorses the revisions to what was already a very comprehensive housing strategy.
- Ensure the housing strategy takes account of the Southwark Stands Together listening exercises and link to the housing strategy action plan
- The commitments look good but I have concerns about the measurability of these.
- How will the council review and update residents?
- There doesn't seem to be an equality analysis accompanying this consultation. For example does the council know how many larger properties are needed for families, or adapted properties for people with disabilities.

Gypsies and travellers

- We are concerned that Southwark's Gypsy & Traveller population is mentioned only minimally within the Southwark Housing Strategy 2020, with the focus on fire safety on the local authority Traveller sites in the borough. Although fire safety is an important issue, there are many other issues relating to Gypsy & Traveller housing that are not mentioned in the Strategy. These include:
 - the housing needs of the Southwark Gypsy & Traveller

- population who are currently living in “bricks and mortar” accommodation;
 - overcrowding and disrepair on the local authority Traveller sites; and
 - the lack of transit sites within the borough.
- “Gypsy and Traveller families are often invisible to services even though..... the majority of respondents to this report were local people living in the local areas they were born and brought up. They were too often viewed by both councils and settled residents as not being part of local communities and consequently not entitled to many of the basic services that facilitate good health outcomes. Equally, they are often overlooked in the planning for better community services – through, for example joint strategic health needs assessment (JSNAs) – because their existence is not recorded in local data systems.
- We know that the council has commissioned an Accommodation Needs Assessment of Southwark’s Gypsy, Roma and Traveller population as part of the preparation of the New Southwark Plan. We recommend that the data and findings from this study are published as soon as possible and used to develop fast-track measures to address the accommodation needs of Southwark’s Gypsy, Roma and Traveller population. Such commitments, with clear, time-limited targets should be included in the new Southwark Plan, the Housing Strategy 2020, as well as other appropriate borough strategies, to ensure a clear cross-council and partnership approach to work with this community.
- We are also concerned at the lack of an Equality Impact Assessment of the Southwark Housing Strategy 2020 and the lack of consideration of Irish Travellers in the 2015 Equality Impact Assessment of the previous Housing Strategy. Irish Travellers are a protected ethnicity under the Equalities Act 2010, and the council is in danger of neglecting its legal duties by not considering the impacts of its Housing Strategy on this particularly disadvantaged community.
- Many of the proposed commitments in the Southwark Housing Strategy 2020 will affect Gypsies and Travellers housed in local authority, and other rented “bricks and mortar” accommodation, but their needs are not specifically referred to in the Strategy. The final Strategy needs to address this omission and include a specific commitment to ensure Gypsies and Travellers living in the borough can choose the type of accommodation that best meets their health and cultural needs, whether this is “bricks and mortar” housing or a pitch on a Traveller site.
- For those living on local authority pitches STAG’s work provides evidence of a lack of pitch provision, overcrowding and problems with poor quality accommodation for Gypsies and Travellers in the borough. Accommodation was the most common casework issue for Travellers that we dealt with in the last six months of 2019. The Fordham Study of Gypsy and Traveller Accommodation Needs in London and the Tower Hamlets Gypsy & Traveller Accommodation Assessment both identified that there was an undersupply of pitches in Southwark. The latter study also highlighted a lack of awareness of the need for more pitches

- “There is demand for pitches from the existing community and there are occasions when there is doubling up of pitches by extended families. The demand for new pitches derives from the natural growth on existing sites.”
- Southwark Council, has a long-term commitment to protecting the existing four Traveller sites in Southwark and providing new sites to meet accommodation needs. This commitment should be reflected in the Southwark Housing Strategy 2020.
- To ensure more long-term Southwark Gypsy and Traveller residents who play an active part in the local community are not forced to move out of the borough and that their children and grandchildren can continue to live according to their culture, Southwark Council should act on its commitments to safeguard the four existing Traveller sites and to provide new site accommodation to meet needs. Including these commitments in the Southwark Housing Strategy 2020 should be part of this renewed commitment and action by the council to fulfil its legal duty under the Equality Act 2010 to Irish Travellers, and more widely to support other Gypsies and Travellers living on its sites.
- The Fordham Study of Gypsy and Traveller Accommodation Needs in London and the Tower Hamlets Gypsy & Traveller Accommodation Assessment both identified a lack of transit pitches in the borough. The latter study also identified that there was a lack of knowledge within the council of short-term encampments in the borough.
- The recent Home Office consultation on unauthorised encampments, has highlighted how a lack of authorised and transit sites manifests itself in unauthorised encampments, weakened community cohesion and expenditure on clearing up and eviction. More importantly it means these protected ethnic groups face poorer health, education and employment outcomes and feel marginalised in society. In addition, confining Travelling communities to a permanent settlement somewhere, runs “roughshod over their culture, identity, ethnicity and human rights.” . Even the Association of Police and Crime Commissioners and the National Police Chiefs’ Council joint response to the Government’s previous consultation on unauthorised encampments, concluded that: “the answer to unauthorised development and encampments is the provision of pitches, both public and private, including not only permanent pitches but also transit pitches and emergency stopping places. Additionally, there is the concept of ‘negotiated stopping’.”
- STAG knows of several unauthorised encampments in the borough over the last few years. Southwark Council should monitor the need for transit sites that such unauthorised encampments suggest and should address any current problems associated with unauthorised encampments through evidence-based policies. This should include commitments, which should be included in the New Southwark Plan and as part of the Southwark Housing Strategy 2020.
 - to provide adequate numbers of Gypsy and Traveller sites and pitches to meet current, and plan for future, accommodation needs for those already living in the borough;
 - to provide transit sites for Gypsies and Travellers passing

- through the borough; and
- to adopt a policy of 'negotiated stopping', modelled on the scheme successfully introduced by Leeds council.