

Ealing LPA's Response to Post Hearing Advice - Issue 4: Gypsies and Travellers

1. Context

1.1 This note is made in response to the Inspectors' letter, dated 3rd July 2025 and which followed the conclusion of the Block 1 Hearing Sessions held between June 16th and 19th 2025, setting out the post hearing advice note specifically regarding Issue 4: Gypsies and Travellers.

1.2 The main issue centres around the future housing needs of the Gypsy and Traveller community, how this was assessed and how the evidence of need was used to inform policy in the Regulation 19 Ealing Local Plan.

1.3 The existing evidence base for Gypsy and Traveller future accommodation, the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, October 2018 (GTAA) {EB80} assessed identified need but used the PPTS 2015 narrower definition of Gypsies and Travellers in making recommendations.

1.4 The GTAA recommended a need for an additional six pitches to meet accommodation need up to 2041. The Regulation 19 Local Plan has proposed a site allocation (09NO Kingdom Workshop) to meet this need.

2. Changing definition of Gypsies and Travellers

2.1 In light of the case of *Lisa Smith v Secretary of State for Levelling Up, Housing and Communities* (2022) in which the Court of Appeal held that the PPTS 2015 planning policy definition of 'Gypsies and Travellers' was unlawfully discriminatory, and an updated PPTS with a wider, more inclusive definition, Ealing accepts that the figures used in the Reg 19 Local Plan in relation to the future housing needs of the Gypsy and Traveller community are based on the narrow definition of Gypsies and Travellers.

2.2 However, it should be noted that the Plan's existing evidence base, the West London Alliance GTAA 2018 {EB80} does include an accommodation needs assessment figure derived from a wider definition of Gypsies and Travellers. This is because that study also took account of the then draft London Plan's wider definition which is consistent with the revised PPTS.

2.3 To address the Inspectors' concerns and to demonstrate that the Plan is positively prepared, justified and effective, Ealing undertook to explore the following actions in advance of the Block 2 Hearing Sessions:

- To provide suggested modifications to ensure need based on the wider definition is included in the Plan.
- To work with the GLA to understand when the findings of the joint London-wide review of Gypsy and Traveller needs.

- To propose a new policy that will encourage windfall sites for Gypsy and Traveller accommodation to come forward over the plan period.
- To work together with the Old Oak and Park Royal Development Corporation (OPDC) to address Gypsy and Traveller accommodation needs in the borough. It should be noted that the London Borough of Ealing's administrative area has one existing Gypsy and Traveller site, and this actually sits outside of Ealing's LPA area, with the OPDC as the LPA.

3. GLA London-wide GTAA

3.1 The new GLA London-wide GTAA remains in draft form and there are on-going concerns in many London LPAs (including Ealing) about the methodology used and its initial findings.

3.2 The report is not expected to be published until sometime in 2026, with no firm date given. This means that Ealing LPA has not been able to rely on this strategic evidence for its emerging Local Plan.

4. London Borough of Ealing GTAA 2025

4.1 In the light of the above, Ealing Council therefore decided to procure Opinion Research Services (ORS) to provide a comprehensive update to the 2018 GTAA. The scope of the report includes the whole of the borough and involved a combination of desk-based research, stakeholder interviews, and engagement with members of the travelling community.

4.2 The report is entitled London Borough of Ealing Gypsy and Traveller Accommodation Assessment, November 2025 and is attached.

4.3 The report identified a need for 43 pitches emerging from the households that met the 2024 PPTS planning definition (see Figure 6). This is made up of:

- 7 pitches from Concealed households/Doubling-up/Over-crowding;
- 17 pitches from a 5-year need;
- 2 pitches from movement from bricks and mortar; and,
- 17 pitches from new household formation.

4.4 The bulk of the identified need in the Ealing GTAA 2025 arises from Bashley Road (38 pitches) which lies within the OPDC area, and which needs to be met collaboratively.

5. Statement of Common Ground between Ealing and OPDC

5.1 Ealing and OPDC have agreed a SoCG to show that there is effective working between the two local planning authorities specifically in relation to Gypsy and Traveller accommodation needs that arise within the OPDC LPA area but fall under the housing responsibilities of Ealing Council.

5.2 Both parties have agreed:

- To accept the identified need for Gypsy and Traveller accommodation.
- To collaborate on identifying suitable and deliverable sites to meet these needs as part of each local planning authorities' future Local Plan reviews.
- To share relevant data, evidence, and policy development to support plan-making and site allocation.
- To ensure that Local Plan policies of both LPAs reflect this cooperative approach and provide a framework for delivery.

5.3 It also acknowledges that Ealing LPA's Local Plan is currently committed to delivering an additional 6 pitches and has identified a site allocation at 09NO (Kingdom Hall, Sharvel Lane, Northolt) within the Ealing LPA area to meet this need.

6. Further Suggested Modifications Proposed by the Council

6.1 In the light of the Ealing GTAA 2025 report the following further suggested modifications are proposed:

6.2 Amend Policy SP3.1 D as follows:

"Investing in a new purpose built and designed Gypsy, Roma, and Traveller (GRT) site ~~to provide meet an identified future need of~~ six additional pitches ~~and work in collaboration with the Old Oak and Park Royal development Corporation on identifying suitable and deliverable sites to meet identified needs.~~"

6.3 Amend the supporting text at Para 3.39 as follows:

"The council aims to provide an additional 6 pitches for the Gypsy, Roma and Traveller community **within Ealing LPA** whilst retaining the 24 pitches at the existing Bashley Road site in Park Royal. **Bashley Road is located within the Old Oak and Park Royal Corporation (OPDC) LPA area, but the site is owned by Ealing Council who are also responsible for its management and maintenance. The Ealing GTAA, 2025 has identified a need for 43 pitches up to 2041 across the London Borough of Ealing with the bulk of that need arising from the existing community at Bashley Road. The council will therefore work collaboratively with the OPDC to carry out a further search and assessment for suitable sites, taking into account the review of the London Plan in tandem with further reviews of the local plans by both Ealing and OPDC LPAs. This policy should also be read in conjunction with the criteria-based policy GTW in Chapter 5 which supports proposals for Gypsy and Traveller pitches on windfall sites that contribute to meeting identified need.**"

6.4 These proposals have been included in the Revised Schedule of Suggested Modifications (dated 6 November 2025) and for ease of reference is FSMM3.

6.5 It is also suggested that a new criteria-based policy to support proposals for Gypsy and Traveller pitches on windfall sites that contribute to meeting identified need be also now included. It is proposed that this policy and accompanying supporting text should be included in Chapter 5 Development Management Policies as follows:

“Policy GTW: Gypsy and Traveller Windfall Sites – Ealing LPA – local policy

Proposals for Gypsy and Traveller sites will be supported where:

- A. They contribute to meeting identified needs for Gypsy and Traveller pitches.**
- B. The site provides a suitable living environment for residents, access to necessary services and is compliant with relevant design guidance.**
- C. Flooding measures are incorporated according to identified flood risk.”**

6.6 The following supporting text is also proposed:

“Ealing’s identified needs for Gypsy and Traveller accommodation are set out in the relevant Gypsy and Traveller Accommodation Needs Assessment whether at borough or London Plan level. A portion of this need is met by sites allocated within the plan and other provision is expected to come forward as windfall sites.

This policy should be read in conjunction with the rest of the local plan, and the approach to Green Belt, grey belt and MOL sites is set out in the NPPF and London Plan respectively. Relevant design guidance has been set out by central government and may be updated or revised for use specifically in Ealing.”

6.7 It has been included in the Revised Schedule of Suggested Modifications (dated 6 November 2025) and for ease of reference is FSMM39.

{END}