

Executive 17 August 2009

Report from the Director of Housing and Community Care

Wards Affected: ALL

Gypsy, Roma and Traveller Inclusion Strategy

Forward Plan Ref: H&CC-08/09-36

Report for publication

Appendix 3 Not for publication ('below the line')

Appendix is exempt from public publication as it contains exempt information as specified in paragraph 5 of Schedule 12A of the Local Government Act 1972 on grounds of legal professional privilege.

1.0 Summary

- 1.1 The Housing Act 2004 and the ODPM planning circular (Circular 01/2006) mainstreamed the accommodation needs of the Gypsy, Roma and Traveller (GRT) communities and placed a requirement on local housing authorities to:
 - a) assess the accommodation needs of GRT communities and
 - b) based on the findings produce a strategy and action plan to work towards providing/finding solutions for the identified need and ensure that the cultural needs of these communities are respected.

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1.2 The draft strategy and action plan cover the next five years, 2009 – 2014 and focus on improving access to all Council/other statutory agencies' services to work in partnership with these communities towards integration and community cohesion.

2.0 Recommendations

- 2.1 Members are asked to note the summary of findings of the GLA commissioned Gypsy and Traveller Accommodation Needs Assessment (GTANA) survey as it relates to Brent (attached as Appendix 1).
- 2.2 Members are asked to note the attached draft strategy and action plan (Appendix 2).
- 2.3 Members are asked to agree the reduction of pitches from 31 to 20 to ease overcrowding on the Lynton Close site once alternative facilities have been found.

- 2.4 Members are asked to agree that a further report should be brought to a future Executive Committee, agreeing the purchase of the identified site(s), setting out how the cost will be met and all other financial implications. It will be necessary for the new site to:
 - a) meet the criteria set out in the Council's Travellers Policy,
 - b) accommodate residents moved from the Lynton Close site and
 - c) provide additional pitches in line with the targets set in the GLA's London Plan due to be published in Autumn 2011.
- 2.5 Members are asked to agree that a further report should be brought to a future Executive Committee setting out detailed costing to:
 - a) refurbish and redesign the Lynton Close site and
 - b) set up the new site in line with the good practice guidance issued by the Department of Communities & Local Government (DCLG).

3.0 Detail

- 3.1 In response to the requirements of the Housing Act 2004 and Circular 01/2006, the GLA commissioned consultants to carry out an assessment of GRT accommodation needs for London boroughs between 2007- 2017. Targets for boroughs, based on the findings and recommendations are to be included in the draft London Plan due to be published later in the year. The possibility has to be considered that the GLA will require boroughs to provide the maximum number of pitches identified in the survey for their area. The other alternative which the GLA may use to set targets is that there should be a more equitable distribution of additional pitch requirements throughout London as the estimation of each borough's need as indicated by the GLA survey, is not necessarily in accordance with their potential additional site capacity.
- 3.1.1 The table below gives a summary of additional pitch and traditional housing requirement for Brent as indicated by the GLA's London GTANA.

Summary: Accommodation Required in Brent 2007 - 2017¹

	Base	N	/linimum Nee	d	Maximum Need			
	Nos - 2007	Additional Need 07 - 12	Additional Need 12 - 17	Sub Total	Additional Need 07-12	Additional Need 12 - 17	Sub Total	
Residential pitches	31	11	6	17	17	7	24	
Traditional Housing Units	50	12	9	21	9	8	17	
Total	81	23	15	38	26	15	41	

Although there are no unauthorised sites in the borough, there is over-occupation of the authorised site. There are 31 pitches on the site, occupied by 45 caravans.

3.2 The maximum need, in the table above, includes numbers of households, currently accommodated in traditional housing, who are likely to suffer from "psychological aversion" to living in bricks and mortar housing as set out in paragraph 15 of the CLG

¹ GLA Gypsy & Traveller Accommodation Needs Assessment 2007

Guidance "Gypsy and Traveller Accommodation Needs Assessment" published in October 2007. Because psychological aversion has not been clearly defined, the West London Alliance is in the process of commissioning some research to clarify the concept of psychological aversion more precisely.

3.3 Draft Gypsy, Roma & Traveller Inclusion Strategy

In their report, "Gypsies and Travellers: The Facts", The Commission for Racial Equality identified these communities as some of the most vulnerable and marginalised minority ethnic groups in Britain. Gypsies and Travellers have traditionally been subject to racial harassment and violence as well as having poor access to services such as accommodation, health, education and employment.

- The implementation of a local strategy which addresses the problems mentioned in the above CRE report, to help the development and integration of GRT communities is regarded not only as good practice but one which is essential and flows naturally from the accommodation needs assessment required by the Housing Act 2004.
- 3.5 It is difficult to assess the exact size of the GRT communities in Brent. There are problems with monitoring; the corporate monitoring form includes Irish Travellers but does not include a category for Roma/Gypsies. Even if both categories were included it is open to self classification; because of historic discrimination and harassment people do not always choose to describe themselves as belonging to these groups. Therefore, we can only estimate the GRT communities living in Brent. Our records indicate that there are between 180 200 people living on the Lynton Close site on 31 pitches and about 30 Irish Traveller and 20 Gypsy Roma households in bricks and mortar housing. These two groups total around 400 people, including children. (The GLA survey found that on average households comprised 4.2 members.)
- 3.6 The attached document is the result of close joint working between representatives of all Council Departments. Consultation with the GRT communities and external partners will begin once approval has been obtained from the Executive.
- 3.7 The aims of the strategy are to develop and support the GRT communities through:-
 - Providing strategic leadership & co-ordinated service delivery to Gypsy,
 Roma and Traveller communities through enhanced partnership working.
 - Improving communication and consultation with the Gypsy, Roma and Traveller communities to encourage participation in decision making in respect of services.
 - Improving and sustaining effective management of authorised Travellers site.
 - Mainstreaming Gypsy, Roma and Traveller needs into Council wide service planning.
 - Creating enhanced access to all major services through improved analysis of service take-up and planning.
 - Identifying additional provisions to meet future housing need for existing and incoming Gypsy, Roma and Traveller communities to Brent/West London.
 - Improving awareness of and access to Public Health and Social Services.
 - Continuing to improve basic skills for adults, through training.
 - Improving employment opportunities for Gypsy, Roma and Traveller communities by developing and building on existing skills.
 - Maximising educational opportunities for all children from nursery to school leavers.
 - Promoting peaceful co-existence between the settled community and Gypsy, Roma and Traveller communities by presenting a positive image of the Gypsy, Roma and Traveller communities and culture.

- Improving services to the Gypsy, Roma and Traveller communities through exchange of good practice with other West London boroughs.
- Tackling crime and community safety issues impacting on the Gypsy, Roma and Traveller community.
- 3.8 The strategy will provide a more comprehensive approach through improved communication and co-ordination not only between Council departments but also between the Council and its external partners. This will build on and develop the services already in place and provide improved access to services for the GRT communities.
- 3.9 It is proposed that the Brent Traveller Interagency Strategic Group should be reestablished and given responsibility for monitoring the strategy and action plan.

3.10 **Lynton Close – Current Situation**

There are 30 Irish Traveller and 20 Roma Gypsy households living in conventional housing in the borough. However, the majority of the Irish Traveller community live on the authorised Travellers site located in Lynton Close. The site is managed by Brent Housing Partnership (BHP) but day to day management is currently the subject of a tendering exercise and an external contractor should be appointed by the autumn. The site is overcrowded, it has 31 pitches occupied by 45 mobile homes accommodating approximately 180 - 200 people. At present there are difficulties in managing the site which would be alleviated in part if the number of occupants was reduced and the layout of the site improved.

- 3.11 In addition to overcrowding, there are other factors which cause tension on the site. These include:-
 - legal action being taken to secure eviction orders against occupants of four pitches,
 - breakdown of relations between most representatives of authority and some residents (particularly those threatened with eviction).
 - poor state of repair of the communally used areas, such as kitchens and other facilities.
 - anti social behaviour by adults and young people on and off the site.
- 3.12 The present arrangement for the management of the site is not ideal but is working satisfactorily. Day to day repairs are carried out by BHP staff who have a good working relationship with residents. Management issues are dealt with South Oxfordshire County Council Travellers Service on a consultancy basis, one day per week. There is also an emergency out of hours service in place. This is an interim arrangement made in response to serious threats and inappropriate behaviour by certain residents towards BHP staff and staff of the previous externally tendered contractor, Azadeh, following commencement of proceedings for possession orders.
- 3.13 BHP are in the process of appointing a new externally tendered contractor and will ensure that the contract terms allow for provision of maintenance/day to day repairs and management services to be easily separated from the contract if necessary to prevent a complete breakdown of services if problems arise between management services and residents.
- 3.14 The Irish Traveller Movement (ITM) was commissioned by BHP to carry out consultation with residents. ITM's report was recently issued and this will help to inform the specification drawn up for the management of the site.

- 3.15 Ideally we would want to reduce the number of mobile homes in line with guidance from the Gypsy & Traveller Unit at the Department of Communities and Local Government (DCLG) which indicates that the optimum number of mobile homes on sites accommodating Gypsies, Roma and/or Travellers is 15 20.
- 3.15.1 For details of improving the current site please see paragraph 4.3 below.

3.16 Suggested Proposals for the Lynton Close Site

A reduction in the number of mobile homes on the site could not be achieved without:-

- identifying appropriate location(s) (in line with the criteria set out in the Travellers Policy) which is likely to prove problematic for practical reasons, given that Brent has 4,325 hectares of land of which 83% is "built up" and 16% is the "natural environment",
- investment of additional resources for purchasing additional site(s),
- improving the existing site in line with the Good Practice Guidance issued by the DCLG.
- 3.17 However, a Local Development Framework Inspector and the Homes and Community Agency will wish to be satisfied that the Council has done everything possible to locate potential site(s). Planning will actively undertake a search for suitable site(s) in response to the indicated need in the GLA survey and Executive Committee approval.
- 3.17.1 Planning therefore proposes to take the following actions to identify such site(s) capable of providing a low density, low rise development affording both a satisfactory residential environment, while enabling the storage of materials or work space required for any potential occupiers entrepreneurial/employment activities.
- 3.17.2 Sites With Existing Residential /Employment Consents
 At a recent meeting the GLA's Manager of Strategic Planning suggested that
 consideration will be given to boroughs, which have a lack of capacity to provide
 additional pitches/site to release land previously designated as a strategic
 employment location in the London Plan. Planning will undertake a records search of
 all the consents for residential development (capacity for at least ten self contained
 homes) and suitably sized employment sites where development has not yet been
 started.
- 3.17.3 Other Identified Potential Residential and Employment Sites
 Planning will scrutinise the remaining unimplemented UDP residential and
 employment UDP Proposals and the proposed LDF Site Specific Allocations.
- 3.17.4 A Multi Agency Site Search

If the above proposals prove fruitless, Planning would then propose the convening of a dedicated multi-agency/multi-disciplinary Travellers Site Working Group to undertake a wider search. The proposed membership should include representatives from Planning, Housing, Property & Assets and Brent Housing Partnership.

- 3.18 The draft strategy also considers and sets out in the action plan how the Council, in partnership with other statutory agencies can improve the life chances of these communities whether housed in mobile homes or conventional housing.
- 3.19 There has been extensive consultation internally on the draft strategy and external consultation will take place following incorporation of feedback from members of the Executive Committee.

4.0 Financial Implications

4.1 **Current Budget**

The income and expenditure for the current financial year is shown below for the Lynton Close site:-

Lynton Close Travellers Site – Financial Budget Summary

Budget	2009-2010
Management fee	£281,655
Legal Fees	£33,293
Bad debt provision	£13,249
Miscellaneous expenses	£20,808
Total Expenditure	£349,005
Income from rents	£343,920

- 4.1.1 Day to day repairs and maintenance is included in the management fee but some exceptional maintenance in the current year has been caused by severe rat infestation in the loft spaces of the 31 utility blocks. An additional £11,000 was spent on pest control and £65,000 on replacing wiring to every pitch which had been destroyed by the rats on the site.
- 4.1.2 The management of the site is currently being re-tendered therefore the management fee figure quoted above is based on the cost of the previously tendered service. However, the overall management fee will need to be contained in the Travellers Site budget.

4.2 Reduction of Pitches

The financial implications of reducing the current site by 11 pitches would be the loss of £120,120.00 rental income per year. The reduction in income in the current site would be considered in a new report regarding the possible establishment of a new site. Please see 4.4 below.

4.2.1 Repairs and maintenance is likely to be slightly disproportionate to the reduction in the number of pitches at the Lynton Close site (ie from 31 pitches to 20 = 36%), it is more likely to be reduced by an estimated 30%. However, the difference should be offset by a reduction in repairs and maintenance on a new site and the existing refurbished site, at least in the first years.

4.3 Improving the Current Travellers Site

The Homes & Community Agency (HCA) made some funding available for acquiring and/or refurbishing of pitches for 2008/09. HCA funding was conditional on 50% matched funding by the recipient local authorities. It is expected that a similar bidding round will be offered in 2009/10 though requirements in respect of matched funding may be different.

4.3.1 Very approximate refurbishment and redesign costs for the Lynton Close site, as it currently stands with 31 pitches is £3.5m. The maximum which we would receive for such works, (if bidding criteria remain the same as last year) from the HCA is 50% of the cost. If our bid for funding is successful from the HCA and the bidding criteria remains unchanged, the cost to the Council would be £1.75m. Prior to submitting a

bid, extensive consultation of residents' views and an architect's professional advice must be sought which would give a truer figure for the necessary works.

- 4.3.2 If we reduced the number of pitches on the Lynton Close site to 20, the cost of refurbishment is likely to be in the region of £2.5m, subject to the provisos set out in 4.3.1 above. If a bid for funding from the HCA succeeds and the criteria remains the same as last year, the cost to the Council, based on very approximate costing would be £1.25m.
- 4.3.3 A further report to a future Executive Committee will set out more accurately the resources needed to improve services to the current GRT site.

4.4 New Site

- 4.4.1 A further report to a future Executive Committee will set out the resources needed to acquire and run a new site.
- 4.4.2 Some of the cost of providing new pitches on a new site will be offset by additional rental income which from April 2009 is £210per week.
- 4.5 Additional funding will also be required for the provision of statutory Council services, ie housing, environmental, educational and cultural services required by the growth in the numbers of these communities. Our links with other statutory and voluntary agencies need to be strengthened through the formation of the Brent Gypsy Roma Traveller Inter-Agency Strategic Group to maximise the chance of success through a co-ordinated approach.

5.0 Legal Implications

- 5.1 The requirements of the Housing Act 2004, the Race Relations (Amendments) Act 2000 and Circular 01/2006 require local authorities to assess the housing needs of the GRT communities in a culturally sensitive manner. The question of "psychological aversion" to living in conventional housing also needs to be considered as set out in paragraph 15 of the CLG Guidance "Gypsy and Traveller Accommodation Needs Assessment".
- Local authorities are required by section 225 of the Housing Act 2004 to carry out an assessment of the accommodation needs of Gypsies and Travellers that reside in or resort to their area, when undertaking a review of housing needs in their area under section 8 of the Housing Act 1985.
- In paragraph 33 of the ODPM Circular 01/06, entitled "Planning for Gypsy and Traveller Caravan Sites", it states that local authorities must allocate sufficient sites for Gypsies and Travellers in terms of the number of pitches required by the Regional Spatial Strategy (for London, the spatial development strategy is called "the London Plan" and is prepared by the Mayor of London), in site allocations Development Plan Documents (DPDs). The London Plan is prepared by the Mayor of London and specifies the pitch numbers for each local planning authority, ie every London Borough Council. The next London Plan, or rather the alterations to the current London Plan, which will set targets for the provision of pitches required in Brent and other London boroughs, should be published and be in force in 2011 following consultation. The DPDs, which are prepared by local planning authorities, including Brent, are required to be in general conformity with the spatial development strategy that is prepared by the Mayor of London.
- 5.4 Section 71 of the Race Relations Act 1971 places a positive legal obligation on a number of public bodies, including local authorities, to "have due regard to the need

to eliminate unlawful discrimination, to promote equality of opportunity and good relations between persons of different racial groups in carrying out all their functions". This is known as the "race equality duty".

- 5.5 The Council also needs to have regard to the obligations under the Race Relations (Amendments) Act 2000 which prohibits racial discrimination by planning authorities.
- In the light of the above mentioned statutory obligations, the Council needs to consider how to make provision in future, either in the borough or sub-regionally/ regionally, to accommodate the projected need for an increased number of pitches in the Borough. The projections (24 pitches between now and 2017), which are provided in the London Boroughs Gypsy and Travellers Needs Assessment (GTANA) are not legally enforceable at present. However, the content of the GTANA will be taken into consideration when the targets for pitch provision are set in the London Plan in 2011.
- 5.7 The London Boroughs Gypsy and Travellers Needs Assessment (GTANA) was commissioned by the GLA in response to the Housing Act 2004, which requires local authorities to consider Gypsy and Traveller accommodation needs in their local housing assessments. The aim of the GTANA is to assess accommodation needs for Gypsies and Travellers in London by borough, sub-region and region and the purpose of the GTANA is to establish how many units of accommodation (either by way of bricks and mortar dwellings, or pitches for caravans) are needed, the extent to which these need to be provided socially or privately, and what the backlog of unmet need may be. All the GTANA aims to provide is the evidence base for the policy making process. The GTANA sets out the type of accommodation required to meet any shortfall of need among London's Gypsies and Travellers. However, the GTANA makes clear that where and how such accommodation should be provided is beyond the scope of that report and will be subject to further policy analysis. As set out above, the targets which London boroughs will need to meet in respect of pitch provision will be set out in the alterations to the London Plan which will be in force in 2011.
- Further legal implications are set out in Appendix 3 to the report and that Appendix is exempt from public publication as it contains exempt information as specified in paragraph 5 of Schedule 12A of the Local Government Act 1972 on grounds of legal professional privilege.

6.0 Diversity Implications

- 6.1 Monitoring
 - The subject of this report concerns the provision of all statutory services to a recognized minority under the Race Relations Act 1976 as amended by the Race Relations (Amendment) Act 2000.
- At present we are unable to provide accurate figures on the number of GRT households in the borough. There are 45 households on the Lynton Close site and the GLA survey reports a further 50 households in conventional housing. It has not been possible to ascertain an exact figure for the number of children and young people from these communities in Brent schools. The problem arises as, in common with many public authorities, we have not included specific categories for Gypsy/Roma and Irish Travellers in our diversity monitoring form.
- 6.3 Although the Commission for Racial Equality's advice was that authorities should base their monitoring categories on the Census 2001 categories, we need to take up the suggestion to adapt it to local circumstances. This should include particular

- ethnic groups the Council employs or provides services to, eg Gypsies/Roma **and** Irish Travellers should be included as specific subcategories of "White Other".
- On receipt of feedback from the Executive Committee, an Impact Needs Requirement Assessment will be carried out.

7.0 Staffing/Accommodation Implications (if appropriate)

7.1 At this stage it is not envisaged that additional office accommodation would be required in Council offices.

Background Papers

- London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, 2008
- Housing Act 2004
- Race Relations (Amendment) Act 2000
- ODPM Planning Circular 01/2006
- CLG Guidance "Gypsy and Traveller Accommodation Needs Assessment" published in October 2007
- Travellers Policy (contained in the draft Local Development Framework, March 09)
- Lynton Close Travellers Site Consultation produced by the Irish Traveller Movement in Britain.

Contact Officers:Martin Cheeseman
Director of Housing & Community Care
Zsuzsanna Messing
Policy & Performance, Housing & Community Care

Martin Cheeseman Director of Housing & Community Care

Summary of London Boroughs' Gypsy & Traveller Accommodation Needs Assessment

Background

A report was commissioned by the GLA on behalf of 33 London boroughs, in response to the Housing Act 2004 which requires local authorities to consider G&T (G&T) accommodation needs in their local housing assessment. It was published in the summer of 2008.

The study, carried out by Fordham Research Limited, considered a range of G&T groups in London, including English Gypsies, Irish Travellers, New Travellers, Travelling Show people and Eastern European Roma. A stakeholder seminar was held in each of the London sub-regions with a further seminar held in Central London to get the views of any stakeholder who could not attend in their sub-region. In addition, the study relied on the following data sources:-

- Secondary information, including a literature review and secondary data;
- Stakeholder consultation, with London organisations involved with G&T affairs;
- Survey of over 800 G&T living on sites and in housing.

Purpose

The aim of the study was to assess accommodation needs for these groups in London by borough, sub-region and region between 2007 and 2017. The purpose is to establish how many units of accommodation (either traditional dwellings, or pitches for caravans are needed, the extent to which these should be provided socially or privately, and what the backlog of unmet need may be. The study aims to provide the evidence base for the policy making process. It details the type of accommodation required to meet any shortfall of need among London's G&T community, but precisely where and how the accommodation should be provided is beyond the scope of the report and will be subject to further policy analysis.

Findings

i) Estimated Population

The study estimates that in the West London sub-region the existing G&T population is:-

Estimated number of families in West London Sub-Region									
Borough	Authorised	Unauthorised	Traditional	Information	Total				
	pitches	sites	Housing	Source					
Brent	31 IT*	0	30 IT 20 G	C+	81				
Ealing	23 IT, 13G,	0	210 IT,	C, SG, TES	283				
	11TS		15G, 11TS						
Hammersmith & Fulham	0	0	22 IT, 64 G	C, TES	86				
Harrow	0	0	55 IT, 10 G	C, TES	65				
Hillingdon	20 G & IT, 18	0	77 G, 73 IT	C, SG, TES	188				
	TS								
Hounslow	20 G, 80 TS	0	36 G, 13 IT,	C, SG, TES	157				
			8 TS						
K&C	20 IT	0	22 IT, 3G	C, TES	45				
Total	236	0	669		905				

^{*}IT = Irish Traveller; G = Gypsy; SG = Showmen's Guild of Great Britain; +C = Council;

TES = Travellers Education Service; TS= Travelling Show People

Brent has one authorised site which is occupied by 45 Irish Traveller families, with a further 30 Irish Traveller and 20 Gypsy families in housing. The survey found the average family unit is made up of 4.2 members. We have no Travelling Show people permanently located in the borough. No West London authority has any G&T families living on unauthorised sites. For purposes of comparison, figures for Barnet are also included, which are Barnet has a total of 64 pitches, 4 on an authorised site and 60 in housing.

To provide an overall picture for London, the total estimated G&T population, including Travelling Show people for all sub-regions, is:-

Sub-Region	East	North	South East	South West	West
Total	543	512	1,514*	296	922

^{*}In the South-East, Bromley with a 1,089 households has the most significant G&T population in London.

London wide, the study found that almost three-quarters (72.4%) of participants in the survey had been living on their site for more than five years with 89% living on sites provided by a local authority or a registered social landlord. The permanency of occupying a site is mirrored by the Irish Traveller families located on the site in Brent.

ii) Estimate of Housing Need

The model used was based on the CLG G&T Accommodation Assessment Guidance published in 2007.

The Guidance states that an assessment of need must consider proven psychological aversion to living in bricks and mortar housing. To overcome the difficulty in assessing this, two levels of need are given, a minimum and maximum figure. The minimum pitch requirement refers to need generated from G&T currently on site and includes overcrowding, unauthorised encampments and newly formed families. The maximum pitch requirement additionally includes the transfer of pitches of Gypsies and Travellers with a psychological aversion to housing currently accommodated in bricks and mortar housing. The need estimate is split into two 5 year periods, and built up using a 14 step process.

Estimate of Housing Need in West London

	Base		Maximum Need						
	Nos - 2007	Additional Need 07 - 12	Additional Need 12 - 17	Sub Total	Total	Add. Need 07- 12	Add. Need 12- 17	Sub Total 0	Total
Unauthorised pitches	0	-	-			-	-	-	
Residential pitches	273	21	23	44	317	109	35	144	417
Housing (all)	522	85	73	158	680	-2	66	64	586
Total	795	106	96	202	997	107	101	208	1,003

iii) Estimate of Housing Need in Brent

Summary: Accommodation Required in Brent - 2007 - 2017											
	Base	Minimum Need				N					
	Nos - 2007		Additional Need 12 - 17	Sub Total	Total	Additional Need 07- 12	Additional Need 12- 17	Sub Total	Tot al		
Unauthorised pitches	0	-	-	-			-	-	0		
Residential pitches	31	11	6	17	48	17	7	24	55		
Traditional Housing	50	12	9	21	71	9	8	17	67		
Total	81	19	16	38	119	26	15	41	122		

Fordhams stress that the figures quoted in the study are evidence of need and should not be regarded as targets for new provision. However, the above projection indicates that by 2017 the West London sub-region will have to provide an additional minimum of 44 pitches and 158 dwellings (17 pitches and 21 dwellings in Brent) or if households with a psychological aversion to living in bricks and mortar accommodation are included, an additional maximum of 144 pitches and 64 dwellings (24 pitches and 17 dwellings in Brent).