

London Borough of Havering

Havering Local Plan 2016 – 2031

Havering's Response to Inspector's Initial Questions 03/08/2018

Housing

1. Assuming the Local Plan is adopted in 2019/20 the Council will have a 5 year land supply of 7,365 units. This is set out in the attached spreadsheet, titled 'Housing Trajectory - 5 year supply from adoption'. This equates to a 5.2 year land supply (taking account of the London Plan Housing Target and a 20% buffer).
2. Please find attached a detailed housing trajectory showing housing supply on an annual basis.
3. Housing delivery is a matter for the development industry. The Council has set out in the Housing Position Statement 2018 its approach to housing land supply. The Council would welcome clarification on any further information that is required.

Gypsy and Traveller accommodation

4. The Council submitted The Gypsy and Traveller Sites Development Plan Document to the Secretary of State in December 2012. Following initial hearing sessions and site visits the Inspector raised a number of concerns. The Examination was suspended in order to provide the Council the opportunity to undertake additional work. Unfortunately it was not possible to complete this work within the timeframe and the Inspector recommended withdrawal of the Plan. The Council withdrew the Plan in February 2015 and a decision was taken to incorporate provision for Gypsy and Traveller accommodation within the emerging Local Plan.

The key letters which set out the Inspector's issues are attached.

5. The Submission version of the Gypsy and Traveller Sites Development Plan Document was based on a needs assessment from 2004 and updated in 2010. The 2010 assessment was an update of work originally undertaken in 2004 for the Council by the University of Birmingham. The assessment also included site visits and an extensive planning history search on all known sites regardless of whether they were authorised or not. This approach was considered appropriate because the 2004 study was carried out in line with best practice guidelines for gypsy and traveller accommodation assessments.

It showed that there were 74 pitches in Havering at the time of the Call for Sites. 13 of these had permanent planning permission. Of the other 61, 36 pitches had temporary permission, 11 had previously had or have since been granted temporary permission and 14 were unauthorised.

The needs assessment also projected a growth of a further 40 households through family formation by 2027 (the end of the plan period).

In preparing the new Havering Local Plan the Council has addressed gypsy and traveller issues alongside other housing issues. It commissioned ORS to undertake an up to date assessment of needs and this supersedes the previous assessments.

It was done to provide an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Show People under the Housing Act 1985, the National Planning Policy Framework (2012) Planning Practice Guidance (2014), Planning Policy for Traveller Sites (2015) and the Housing and Planning Act (2016). It will be noted that a number of these items were published after the Gypsy and Traveller Sites DPD was being prepared and thus justifies the Council undertaking a wholly new assessment.

The Council considers that its assessment provides a credible evidence base and it has used this to aid the implementation of development plan policies and the provision of traveller pitches and plots in five year increments covering the period of the Local Plan from 2016 to 2031. As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.

In undertaking the work, ORS collated a desk based review, undertook stakeholder engagement, worked collaboratively with neighbouring authorities and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather robust information to assess households against the planning definition of a traveller, multiple visits were made to households where it was not initially possible to conduct an interview.

The evidence base document used to inform the Proposed Submission Havering Local Plan was the GTAA that was published in February 2017. This identified a need for 33 additional pitches for households that met the planning definition of a Traveller, 26 of which would be needed in the first 5 years of the plan period (2016-21).

During the fieldwork for the GTAA a number of households declined to take part in the interviews. In addition, there were a number of households that were not present during the fieldwork period.

Following the consultation on the Proposed Submission Havering Local Plan in August and September 2017 residents on a total of 14 sites where interviews were not completed contacted the Council to request that they be interviewed. The Council felt it important that these interviews were undertaken so that any additional need could be identified. The consultants that prepared the GTAA revisited these sites and completed additional interviews covering households living on a total of 36 pitches.

As a result of the information that was collected during the additional interviews the assessment of need for additional pitches in Havering was revised to provide a more robust evidence base to support the new Local Plan.

The outcome of the revised assessment was that the need for additional pitches increased from 33 to 70 for those households that met the planning definition, and from 29 to 102 for unknown households that were either not interviewed, or where it was not possible to assess households against the planning definition using information gathered through proxy interviews.

This assessment supersedes the outcomes of the 2017 GTAA that were used to inform *Policy 11 - Gypsy and Traveller Accommodation*.

The updated assessment has informed the proposed modifications that have been put forward by the Council.

6. As set out in the response to the previous question additional interviews were completed with residents living on a total of 36 pitches on 14 sites following the consultation on the Proposed Submission Havering Local Plan in September 2017. The outcome of these interviews was that more detailed information about households living on these sites was available to inform the assessment of need.

The tables below set out the differences between the 2017 GTAA and the 2018 GTAA for households that meet the planning definition and for unknown households where either no interview was completed, or where there was insufficient information to assess the households against the planning definition.

Both tables show that the reasons for the increased levels of need are as a result of additional unauthorised pitches; higher numbers of concealed or doubled-up households; higher numbers of teenagers who will be in need of a pitch of their own in the next 5 years; and higher levels of new household formation.

Gypsies and Travellers - Meeting New Definition	2017	2018	DIFF
Supply of Pitches			
Additional supply from vacant public and private pitches	0	0	0
Additional supply from pitches on new sites	0	0	0
Pitches vacated by households moving to bricks and mortar	0	0	0
Pitches vacated by households moving away from the study area	0	0	0
Total Supply	0	0	0
Current Need			
Households on unauthorised developments	6	18	12
Households on unauthorised encampments	0	0	0
Concealed households/Doubling-up/Over-crowding	2	8	6
Movement from bricks and mortar	0	1	1
Households on waiting lists for public sites	0	0	0
Total Current Need	8	27	19
Future Need			
5 year need from teenage children	7	13	6
Households on sites with temporary planning permission	9	10	1
In-migration	0	1	1
New household formation	9	19	10
Total Future Needs	25	43	18
Net Pitch Need = (Current and Future Need – Total Supply)	33	70	37

Gypsies and Travellers - Unknown	2017	2018	DIFF
Supply of Pitches			
Additional supply from vacant public and private pitches	0	0	0
Additional supply from pitches on new sites	0	0	0
Pitches vacated by households moving to bricks and mortar	0	0	0
Pitches vacated by households moving away from the study area	0	0	0
Total Supply	0	0	0
Current Need			
Households on unauthorised developments	12	36	24
Households on unauthorised encampments	0	0	0
Concealed households/Doubling-up/Over-crowding	0	19	19
Movement from bricks and mortar	0	0	0
Households on waiting lists for public sites	0	0	0
Total Current Need	12	55	43

Future Need			
5 year need from teenage children	0	16	16
Households on sites with temporary planning permission	11	10	-1
In-migration	0	0	0
New household formation	6	21	15
Total Future Needs	17	47	15
Net Pitch Need = (Current and Future Need – Total Supply)	29	102	73

7. The housing needs of all Gypsy and Traveller households have been assessed by the Outer North East London Strategic Housing Market Assessment (SHMA) and subsequent Update for Havering 2016, which demonstrates a broader OAN across housing typologies in aggregate and includes culturally specific accommodation need for Gypsies and Travellers, whether they travel or not (refer to pages. 127 - 128 of the Outer North East London SHMA).

With regards to inland waterways and the mooring of houseboats, there are currently no households living on houseboats in Havering. Furthermore, there are no suitable waterways for the mooring of houseboats within the borough.

8. The Local Plan Inspector for Maldon in Essex concluded in his Examination Report (June 2017) that a Local Plan should not seek to allocate pitches to meet need from unknown households and that meeting this need should be left to the development management process.

Policy 11 of the Proposed Submission Havering Local Plan enables the Council to meet this need through the Development Management Process.

An extract from his Examination Report can be found below.

150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, **MM242h** is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" – the whole Plan need not be reviewed.

Compliance with the London Plan

9. An initial meeting with the GLA and TFL specifically on the proposed parking standards took place on the 11th September 2017 during the Regulation 19 consultation.

Following the response to the Regulation 19 consultation from the GLA/ TFL a further meeting was held on 12th December 2017 to discuss a way forward and try to resolve the conformity objection.

Unfortunately it was not possible to agree a way forward ahead of Submission of the Local Plan and the Council maintains its position as set out in the Submission Documents. However, the Council would like to continue to work towards a resolution and on that basis a further meeting with the GLA and TfL is being arranged for late August 2018.