For the attention of Ms Susan Heywood

Dear Ms Heywood

Havering Local Plan Examination - Response from London Borough of Havering to Inspector’s Note – Gypsy and Traveller issue

Thank you for the post-hearing note on gypsy and traveller matters received via the Programme Officer on November 12th 2018.

As with the Council’s response to your note on Spatial Strategy and Housing matters, the comments below follow the structure and content of your note.

Gypsy and Traveller Accommodation Assessment (GTAA)

The Council will undertake further work to the Gypsy and Traveller Accommodation Assessment (GTAA) as identified in your letter to better meet the requirements of Planning Policy for Traveller Sites (PPTS) and to provide a more up-to-date evidence base for establishing Gypsy and Traveller accommodation needs and then identifying sufficient sites to meet that need.

The Council will update Figures 7 and 9 of the GTAA to incorporate recent planning permissions and to update numbers of pitches on sites where appropriate. Following this the needs assessment will be repeated to identify any updated need arising from these sites.

‘Unknown’ Households

In order to ensure that the approach in the Local Plan can be fully justified, the Council will revisit the GTAA in the light of your comments about its timing and the potential implications arising from the success rate of the survey and the use of proxy interview responses.

An up-to-date picture will be secured of the number of households who meet the statutory planning definition as set out in PPTS. This will include a review of the approach to ‘unknown’ households and household formation rates and the implications of these for pitch numbers that must be addressed through the Local Plan.
Need from households who do not meet the planning definition

The GTAA underpinning the Local Plan identified the need for a further 2 pitches for those interviewed households who did not meet the planning definition. The GTAA will be reviewed and, if necessary revised, to reflect the consideration afforded to ‘unknown’ households as set out above.

The Local Plan currently does not seek to meet the need for those not meeting the planning definition. The Council will explain how it intends to meet the requirements of Section 124 of the Housing and Planning Act 2016 to “consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed”.

Transit requirements

The Council will re-assess the approach to providing transit sites as part of the further work to the GTAA in response to an increase in the number of unauthorised encampments that have been recorded since the GTAA was prepared.

Site allocations

In addition to updating the GTAA, the Council will ensure that the sites identified in the Local Plan meet the requirements of PPTS. It will ensure that the Local Plan identifies a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against locally set targets and developable sites or broad locations for growth for years 6 to 10 and, where possible, for years 11 to 15.

The Council will ensure that all the sites that have the potential to meet the need are assessed against consistent criteria.

The Council will consider the scope for the Local Plan to include appropriate flexibility including a review mechanism in regard to pitch numbers and further site allocations.

The Council will consider your concerns linked to the deliverability of the allocated sites resulting from them remaining in the Green Belt. It is noted that you consider that planning applications which come forward on these sites will be required to demonstrate very special circumstances in order to be approved. You have mentioned that PPTS states that, subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.

Resulting from this, you highlighted that paragraph 17 of PPTS advises that planning authorities may wish to consider making an exceptional, limited alteration to the defined Green Belt boundary to meet a specific identified need for a traveller site.

Policy 11 revisions

A number of modifications to the wording of Policy 11 will be prepared:

- Reference to ‘maximum’ in the policy and site allocations should be removed;
• Criterion iii – this should relate to the layout to accommodate the number of pitches;
• Criterion iv – insert the words “or are capable of being provided with” or similar;
• Criterion v – Landscaping and boundary treatment should be in accordance with policy 27;
• Criterion vi – remove and place in explanatory text;
• Criteria vii-ix – these should reflect PPTS paras 11, 13, 24 and 26: Parking and convenient access to the highway and public transport are not matters mentioned in PPTS and should not therefore be criteria in the policy.
• Criterion x – this should include the site occupants;
• Criterion xii – not necessary.

The Council will use its best endeavours to have this further work completed as soon as possible so as not to delay the resumption of the Examination.

It anticipates that it may need to undertake further site survey work to ensure the GTAA is up-to-date and your concerns are addressed

It will aim to have this work completed as soon as reasonably possible in January 2019 and by the end of that month at the latest.

Yours sincerely,

Martyn Thomas
Development and Transport Planning Manager