

### **REPORT CABINET** 18 January 2012 **Subject Heading:** Havering Local Development Framework: Gypsy and Traveller Sites DPD Proposed **Submission Document** Councillor Robert Benham **Cabinet Member: CMT Lead:** Cynthia Griffin, Group Director Culture and Community Report Author and contact details: Peter Hall, Development Planning Team Leader Tel: 01708 432522 E-mail: <a href="mailto:peter.hall@havering.gov.uk">peter.hall@havering.gov.uk</a> **Policy context:** LB Havering Local Development Framework The costs of consultation are expected to Financial summary: be minor and will comprise the administrative tasks linked to publicising and consulting on the draft DPD. They will be met from existing budgets within the **Development and Transport Planning**

Group

Is this a Key Decision?

Is this a Strategic Decision? Yes

When should this matter be reviewed? N/A

Reviewing OSC: Towns and Communities

#### The subject matter of this report deals with the following Council Objectives

| Ensuring a clean, safe and green borough                           | [√] |
|--|-----|
| Championing education and learning for all                         | [ ] |
| Providing economic, social and cultural activity in thriving towns |     |
| and villages   | [√] |
| Valuing and enhancing the lives of our residents                   | [√] |
| Delivering high customer satisfaction and a stable council tax     | [ ] |
|  |     |

#### SUMMARY

- 1.1 The Council has a legal responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. Havering's statutory Local Development Framework (LDF) Core Strategy states that sites to meet the housing needs of Gypsies and Travellers will be identified by the Council in a separate Development Plan Document (DPD).
- 1.2 This report updates Members on the preparation of this and seeks approval for the Proposed Submission Document (the draft of the DPD which is submitted to the Secretary of State for public examination).
- 1.3 In summer 2011 the Council undertook public consultation on an Issues and Options report for the Gypsy and Traveller Sites DPD. The report included a needs assessment and set out proposed criteria for deciding whether pitches are suitable for use by gypsies and travellers. It emphasised that gypsy and traveller pitches are inappropriate development in the Green Belt and should only be permitted in very special circumstances under national planning policy. It noted however that many of the existing sites in Havering did not give rise to local planning objections and have been occupied by the same families for several years.
- 1.4 The report identified that there were 74 existing pitches at the time of the needs survey in 2010 on which the report was based. 12 pitches had permanent planning permission; 48 had temporary permission or expired temporary permission and 14 pitches were unauthorised.
- 1.5 The Council's preferred option for meeting the housing needs of gypsies and travellers was for 14 additional authorised pitches to be provided so that, taken together with the number of pitches which have or previously had permanent or temporary permission, the total number of authorised pitches would be sufficient to meet the needs of the gypsy and traveller households who were living in Havering at the time of the needs assessment. The report made clear however that not all the 48 pitches with temporary permission or expired temporary permission would necessarily be granted permanent planning permission and that this would be the subject of careful assessment

- on a case by case basis. Nevertheless, this was considered the right number of pitches to plan for.
- 1.6 There were generally positive responses to consultation. In the light of this, officers have prepared the Proposed Submission Document for Member approval. Subject to this it will be the subject of public consultation and then submission to the Secretary of State for public examination.
- 1.7 The Proposed Submission Document proposes that 45 of the 48 existing pitches with temporary or expired temporary permission may be considered acceptable given the importance of meeting the needs of gypsies and travellers so far as possible while protecting the Green Belt. The two pitches with temporary permission at Maylands (the former Brook Street service station adjoining the A12 Trunk Road) were the subject of significant objections from Brentwood Council and local residents. Staff consider that, in the light of the planning issues associated with this site and the representations received, the Maylands pitches are unsuitable for permanent permission. In addition, a single pitch with temporary permission at Prospect Road is considered unsuitable for permanent permission due to planning issues associated the site including its location within a Site of Importance for Nature Conservation and it being visually intrusive within the Green Belt.
- 1.8 The Proposed Submission Document proposes that 17 further pitches are authorised 14 to achieve the Councils preferred option for the number of pitches and 3 to compensate for not making the Maylands and Prospect Road sites permanent. Details of the sites to accommodate these pitches are set out in section 3 of this report.
- 1.9 Subject to Member approval, the Proposed Submission Document will be published for a six week period of consultation. It will then be submitted to the Secretary of State for examination.

#### **RECOMMENDATIONS**

#### 2.1 That Cabinet:

- (1) Recommend that the Council approves the Proposed Submission Gypsy and Traveller Sites Development Plan Document (attached as Appendix 1) for consultation.
- (2) Recommend that Council approves the Report on Consultation (attached as Appendix 2).
- (3) Delegate approval of the Final Sustainability Appraisal for the Gypsy and Traveller Sites DPD to the Cabinet Member for Community Empowerment.

(4) Delegate to the Head of Regeneration, Policy and Planning, in consultation with the Cabinet Member for Community Empowerment, authority to make minor amendments to the wording which do not affect the substance of the Development Plan Document before formal submission, in the event that such changes are needed following consultation.

#### REPORT DETAIL

#### 1 Background

- 1.1 Havering's Local Development Framework (LDF) is a suite of planning documents that collectively guide the future planning of the Borough to 2020. It is led by the Core Strategy and Development Control Policies DPD (2008) which sets out Havering's vision and objectives for the planning of the Borough, as well as detailed Development Control policies that apply across the whole of the Borough.
- 1.2 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF that takes account of national policy considerations and has the purpose of allocating suitable and available sites for Gypsies and Travellers resident in Havering. As Development Control policy DC8 (Gypsies and Travellers) provides detailed criteria for the determination of planning applications for the provision of Gypsy and Traveller sites, the DPD will take the form of a site allocations document. It will identify suitable and available sites within Havering where, subject to planning permission, pitches meeting the criteria detailed in DC8 may be developed or retained for Gypsies and Travellers in Havering.
- 1.3 The DPD preparation has also been governed by the Planning and Compulsory Purchase Act 2004 (as amended). It must comprise: A 'Call for Sites', an Issues and Options report and a Proposed Submission Document.
- 1.4 This report addresses the final stage of the DPD preparation and the Proposed Submission Document.

#### 2 Issues and Options Consultation

2.1 Comments received during the consultation have informed the preparation of the Proposed Submission Document. A full report on the consultation and the Council's responses to the representations made must be published with the Proposed Submission Document. This is attached as Appendix 1 to this report for Member approval.

- 2.2 A total of 66 stakeholders responded to the consultation including 21 representations from or on behalf of gypsies and travellers. The key points from the consultation are:
  - The majority of respondents felt that the accommodation needs of the Gypsy and Traveller community in Havering had been correctly identified in the report.
  - Two additional sites were put forward for consideration:
    - o Mariecot Bungalow, Church Road, Noak Hill
    - o Willow Tree Lodge, Brookmans Park Drive, Cranham

(In addition, to address an earlier oversight, an existing traveller site at Prospect Road in Hornchurch with temporary permission for one pitch until 2013 has been included. All these three sites have been assessed in line with the site assessment criteria set out by the Council.)

- The proposed site assessment methodology was considered to provide a reasonable and robust means of assessing the suitability of potential sites.
- The majority of respondents supported the view that any new [permanent] pitches should be on existing sites rather than on new locations in the Borough.
- Brentwood Borough Council and 30 local residents objected to the Maylands pitches
- 19 people predominantly families living on the sites suggested that the Church Road, Noak Hill sites would be suitable as permanent Gypsy and Traveller sites.
- The majority of respondents felt that no transit site should be provided in Havering.
- 2.3 Most responses from, and on behalf of, gypsies and travellers generally wanted more than a further 14 authorised pitches identified to allow for future growth of their households. However, staff remain of the view that the approach in the Issues and Options report struck the right balance between meeting the priority housing needs of gypsies and travellers by permitting a sufficient number of pitches to accommodate all the households living in Havering at the time of the needs survey and only allocating Green Belt land where this is justified by 'very special circumstances' staff do not consider that the release of Green Belt land now to accommodate future demand resulting from household formation could be justified as 'very special circumstances'. Accordingly, it is recommended that the overall number of additional authorised pitches should not be increased beyond 14, in line with

the Council's preferred approach in the Issues and Options document. This approach has been taken forward into the Proposed Submission Document.

#### 3 Proposed Submission Document

3.1 Following the public consultation responses and in line with national planning policy officers have drafted the Proposed Submission Document which is attached as Appendix 2.

#### Assessment of existing sites

- 3.2 All the existing and additional sites submitted through the 'call for sites' and consultation stages have been assessed to determine which, if any, may be acceptable in terms of being considered for accommodating pitches for permanent planning permission. As well as physical and site issues, the assessment takes account of the planning history of the sites (in particular Inspector's reports and planning appeal decisions).
- 3.3 Following careful consideration and taking full account of the Green Belt policy issue, staff consider that all of the pitches with temporary or expired temporary permission are considered acceptable with the exception of the two pitches on the Maylands site and the single pitch with temporary permission at Prospect Road.
- 3.4 This approach recognises the practical difficulties of accommodating sites in Havering within the built up area, the importance of minimising the effect on the Green Belt and the need to identify sufficient pitches in a way which, so far as possible, meets the needs of Havering's existing gypsies and travellers. All of the pitches have been occupied by travellers for some time and have generally not given rise to local planning objections and no additional land is being designated to accommodate these pitches. Details of the sites to accommodate the 45 pitches are set out in section 5 of the Proposed Submission Document. This commits the Council in principle to the permanent use of these pitches by gypsies and travellers, but individual proposals for pitches will still be subject to careful assessment through the planning application process to replace their temporary or temporary expired planning permission with full permission(s).

#### Proposals for additional authorised pitches

3.5 In order to ensure that all existing gypsy and traveller families can be accommodated a further 17 pitches will need to be authorised (made up of 14 to meet the Council's preferred option for the number of pitches and 3 to compensate for not making the pitches on the Maylands and Prospect Road sites permanent). The report recommends making the following pitches authorised:

#### Vinegar Hill, Lower Bedfords Road (junction with Straight Road) (7pitches)

4 unauthorised pitches are already located on this site, which is generally well laid out and maintained, and could be made permanent. The site could also accommodate 3 pitches required as a result of the Maylands and Prospect Road site pitches being unacceptable.

This site previously had temporary permission for six pitches which are already located on the site. These pitches have been included in the 46 pitches with temporary or expired temporary permission considered acceptable for permanent permission (see para. 3.3 above).

### In total this site is therefore identified for 13 pitches in the Proposed Submission Document.

#### <u>Land between 66-72 Lower Bedfords Road</u> (1 pitch)

This is a single unauthorised pitch which has been occupied since 1999, situated among other residential properties and is well maintained and screened.

#### This site is identified for 1 pitch in the Proposed Submission Document.

#### Willoughby Drive (off Dagenham Road) (1 pitch)

This single unauthorised pitch (WD1) is next to two other sites with temporary permission and to the west of a row of terraced houses. The area's contribution to the Green Belt is limited by other uses in the vicinity, including a waste transfer facility.

#### This site is identified for 1 pitch in the Proposed Submission Document.

#### Church Road, Noak Hill (8 pitches)

In addition to 4 pitches at Church Road with temporary permission there are eight unauthorised pitches at this site. These were refused permission on appeal primarily because the Inspector considered that they would intrude on the openness of the Green Belt.

As set out in the site assessment, the 2 unauthorised pitches (CR6 and CR11) which are closest to those with temporary permission could reasonably be allowed to remain and are proposed for retention in the Proposed Submission Document. The 6 other existing unauthorised pitches are not considered acceptable for permanent permission in their current location because of their impact on the openness of the Green Belt and visibility from Church Road and these two sites (CR5 and CR12) have not been allocated in the Proposed Submission Document.

However, the land at the existing Mariecot Bungalow (which adjoins these sites) is a new site in the same locality put forward by an agent for the landowner during the public consultation. Staff consider that its use for accommodating a specified number of pitches would have less visual impact than the existing unauthorised pitches and would on balance be an acceptable way to accommodate the need for 6 additional pitches. Mareicot Bungalow has, therefore, been identified for 6 pitches in the Proposed Submission Document.

## The Church Road sites are therefore identified for a total of 12 pitches in the Proposed Submission Document.

- 3.6 As all of the sites identified in the Proposed Submission Document are privately owned it will be up to individuals to submit planning applications which will be assessed against their conformity with the Core Strategy and Development Control Policies DPD as well as any site specific criteria identified in the final Gypsy and Traveller Sites DPD following examination and adoption.
- 3.7 Staff consider that by allocating the sites set out in the Proposed Submission Document this will ensure that Green Belt land has only been allocated where this is justified by 'very special circumstances' in order to address the accommodation needs of Gypsy and Traveller families in Havering. With the exception of the land at Mariecot Bungalow, all the land allocated for permanent permission is within existing sites rather than new locations which will allow families to remain on or close to, in the case of Church Road established sites and is in line with the Council's preferred approach.

#### 4 Sustainability Appraisal

- 4.1 DPDs are subject to a Sustainability Appraisal and a report must be prepared detailing the findings of the appraisal. The purpose of the appraisal process is to promote sustainable development through the improved integration of sustainability considerations into the preparation and adoption of Local Development Documents.
- 4.2 At the time of preparing this report, the Final Sustainability Appraisal is still being prepared. As with previous DPDs, to avoid delaying approval of the Gypsy and Traveller Sites DPD, it is recommended that the Cabinet Member for Community Empowerment is authorised to approve the Final Sustainability Appraisal Report.

#### 5 Next Stages

5.1 Subject to Cabinet and Council approval of the Proposed Submission Document and completion of the supporting documents, these will be published for public consultation.

5.2 In order to deal with any minor changes resulting from comments received during consultation, which are needed to prepare the DPD for its public examination, it is recommended that the Head of Regeneration, Policy and Planning, in consultation with the Cabinet Member for Community Empowerment, be given delegated authority for minor amendments to the wording of the DPD prior to formal submission to the Secretary of State, provided that these do not affect the substance of the DPD policies.

#### **REASONS AND OPTIONS**

#### Reasons for the decision:

Havering's Local Development Scheme commits the Council to preparing the Gypsy and Traveller Sites DPD. This is also referred to in Havering's Core Strategy and Development Control Policies DPD as this supports its implementation.

Adoption of the DPD, with the appropriate level of site provision, will allow the Council to enforce successfully against future unauthorised sites.

#### Other options considered:

There are no alternative options as the requirements are set out in statute and subordinate legislation. Havering's Local Development Scheme (2010) commits the Council to preparing a Gypsy and Traveller Sites DPD, and public consultation is required under Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 as amended.

#### **IMPLICATIONS AND RISKS**

#### Financial implications and risks:

The cost of preparing the consultation document and the costs of consulting on it are not expected to be significant and will be met from existing budgets within the Development and Transport Planning Group.

There are no wider financial implications for the Council. The land in question is owned by the travellers and other private landowners.

#### Legal implications and risks:

Section 20 of the Planning and Compulsory Purchase Act 2004 requires every DPD to be submitted to the Secretary of State for independent examination once the

#### Cabinet, 18 January 2012

Council is satisfied it has complied with the necessary regulations and the DPD is ready for independent examination.

Once a proposed DPD is prepared, before submitting it to the Secretary of State for approval, the Council must publicise it in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations as amended, seek representations on the soundness of the DPD in line with Regulation 28 and make a request for the Mayor of London's comments in accordance with Regulation 29.

#### **Human Resources implications and risks:**

Officers consider that the consultation on the Proposed Submission Document can be delivered within existing staff resources.

#### **Equalities implications and risks:**

The Equality Act 2010 provides a cross-cutting legislative framework that brings together many pieces of former legislation, including the Race Relations Act 1976. The Equality Act gives local authorities a general duty to eliminate unlawful discrimination, and to promote equality of opportunity and good relations between different groups in carrying out their functions.

Both Gypsies and Irish Travellers are recognised as ethnic minorities, which requires local authorities to consider fully their specific needs and to assess the impact and consult on proposed policies on Gypsies and Irish Travellers. Policy decisions must be fair in their balancing of the needs/rights of both the travelling and settled communities.

The proposals in the Proposed Submission Document will provide sufficient pitches for the existing number of gypsy and traveller households identified in the needs assessment. It will enable a large majority of households to remain on their existing pitches, and it will provide some of them with much greater security in their living arrangements by establishing a planning policy framework which enables permanent planning permission to be granted. At the same time the proposals are designed to minimise the risk of tensions between the travelling and settled communities by allocating pitches in locations where there are gypsies and travellers already living which have not given rise to significant public objections.

Two families at the Maylands site and one family at Prospect Road will be affected by the decision to not designate these sites for permanent permission in the DPD. However, these sites have temporary planning permission until 2016 and 2013 respectively and additional pitches have been identified on the Vinegar Hill site to enable the families to remain living in Havering if they wish to do so. In addition, two unauthorised sites at Church Road with six families have not been designated in the DPD for permanent permission. However, a new site at Church Road has been put forward by the landowner and identified in the DPD as suitable for 6 pitches which would enable the families to remain in the immediate vicinity of their current sites.

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The Sustainability Appraisal Framework has been designed to reflect the Council's guidelines on conducting an Equality Impact Assessment of emerging policies, and further detailed consideration of the equalities impacts of the proposals will be contained in the appraisal of site allocation options against these Sustainability Appraisal objectives. A Final Sustainability Appraisal Report will be published for consultation alongside the Proposed Submission Document.

**BACKGROUND PAPERS** 

Gypsy and Traveller Sites DPD: Issues and Options Report (June 2011)



# **Gypsy and Traveller Sites Development Plan Document**

Report on Issues and Options Consultation

December 2011

#### **Issues and Options Consultation**

The Gypsy and Traveller Sites Development Plan Document (DPD) will be a statutory document within Havering's Local Development Framework (LDF). The DPD details how the Council will make provision for sufficient additional pitches for Gypsies and Travellers in the Borough.

Consultation on the Issues and Options Report of the Gypsy and Traveller Sites DPD took place from 27 June 2011 to 8 August 2011. Nine specific consultation questions were set out in the report along with an open question for any additional comments.

A total of 66 stakeholders commented on the Issues and Options Report. Respondents either completed the consultation questionnaire included in the report or submitted comments on the plan as a whole or individual sites identified in the report.

This report is set out in two sections. Section 1 sets out the responses to the nine specific consultation questions in the Issues and Options Report. Section 2 sets out all the written comments received during the consultation together with the Council's response to the representation.

#### **Next stage**

The comments received have been used to inform the preparation of the Gypsy and Traveller Sites DPD Proposed Submission Report. This will be published for further public consultation before being submitted to the Secretary of State prior to examination by a Planning Inspector.

### 1. Questionnaire responses

#### **Identified Need**

# Q1: Have the accommodation needs of the Gypsy and Traveller community in Havering been correctly identified?

| Yes | 21 |
|-----|----|
| No  | 3  |

24 people responded to this question and the majority (21) felt that the accommodation needs of the Gypsy and Traveller community in Havering had been correctly identified in the report.

#### **Call for Sites**

Q2: Do you know of any additional suitable and available sites/land within Havering that should be considered for allocation as a Gypsy and Traveller site?

Two additional sites were put forward for consideration:

- Maricot Bungalow, Church Road, Noak Hill, Romford, RM4 1LB
- Willow Tree Lodge, Brookmans Park Drive, Cranham, Upminster, RM14 1LW

Both sites will be assessed by the Council in line with the site assessment criteria during the next stage of the DPD production.

In addition, an existing traveller site at Prospect Road in Hornchurch with temporary permission for one pitch was not included in the Issues and Options Report. This will also be assessed by the Council during the next stage of the DPD preparation.

#### **Submitted Sites**

Q3: Do you have any comments on the pitches/sites (included in Appendix E) submitted for consideration as a Gypsy and Traveller site?

53 people commented on the sites submitted for consideration as a Gypsy and Traveller. The majority of the comments related to the Maylands site (MY1) and the Church Road sites (CR1-13). All comments on the sites are included in Section 2 of this report.

30 respondents - all local residents - commented on the Maylands site and what they considered its unsuitability as a permanent Gypsy and Traveller

site. A large number of the respondents also commented on the initial site assessment of planning and environmental constraints on page 54 of the report and how this incorrectly stated that the Maylands site was not within or close to a locally valued area. The site is adjacent to a Local Site of Importance for Nature Conservation and this will amended in the full site assessment to inform the Proposed Submission Report.

19 people – predominantly families living on the sites - commented on the Church Road sites and what they considered their suitability for consideration as permanent Gypsy and Traveller sites.

#### **Proposed Site Assessment Methodology**

Q4: Does the proposed site selection methodology and the range of factors to be considered therein provide a reasonable and robust means of assessing the suitability of potential sites?

| Yes | 25 |
|-----|----|
| No  | 1  |

26 people responded to this question and all bar one felt that the proposed site assessment methodology provides a reasonable and robust means of assessing the suitability of potential sites.

#### **Objectives for Gypsy and Traveller Sites**

### Q5: Do you agree with the proposed objectives for the Gypsy and Traveller Site Allocations DPD?

| Yes | 23 |
|-----|----|
| No  | 1  |

24 people responded to this question and all bar one agreed with the five proposed objectives for the Gypsy and Traveller Site Allocations DPD.

#### **Number of pitches**

## Q6: Which of the options 1A to 1C would you support, for the numbers of authorised pitches which should be allocated in the DPD?

| 1A – allocate land for a further 14 authorised pitches | 3  |
|--|----|
| 1B – allocate land for a further 34 authorised pitches | 0  |
| 1C – allocate land for a further 53 authorised pitches | 21 |

24 people responded to this question and the majority (21) supported the allocation of land for a further 54 authorised pitches in the DPD. Three

respondents supported the [Council's preferred] option of allocating land for a further 14 authorised pitches.

#### **Distribution of sites**

# Q7: Which of the options 2A or 2B would you support, for whether new pitches should either be dispersed or concentrated in the DPD?

| 2A – concentrated              | 23 |
|--------------------------------|----|
| 2B – dispersed (new locations) | 1  |
| Both options                   | 1  |

25 people responded to this question and the majority (23) supported the view that any new [permanent] pitches should be on existing sites rather than on new locations in the Borough.

#### Transit site

# Q8: Which of the options 3A or 3B would you support, for whether a transit site should be considered for Havering in the DPD?

| 3A – no transit site in Havering        | 15 |
|---|----|
| 3B – provide a transit site in Havering | 6  |
| Both options                            | 2  |
| Neither option                          | 1  |

24 people responded to this question. 15 people felt that no transit site should be provided in Havering. 6 people thought that a transit site should be provided in Havering if further investigation shows that it would meet a London-wide need.

#### Implementation and Monitoring

# Q9: Are the two proposed indicators sufficient to assess the effectiveness of the Gypsy and Traveller Site Allocations DPD in meeting its stated objectives?

| Yes | 23 |
|-----|----|
| No  | 1  |

24 people responded to this question and all bar one felt that the two proposed indicators were sufficient to assess the effectiveness of the DPD in meeting its stated objectives.

### **Additional comments**

All additional comments made during the consultation are included in Section 2 of this report.

### 2. All comments

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
| 1  | Mike Allen             | Q8  Additional comments | There is a need [for a transit site] if all pitches that are currently being lived on do not get passed as this is our base for our Doctors and Health Visitors and somewhere to go if our children need hospital treatment or suchlike.  I live on the plot known as CR3 [Church Road] when I'm not travelling. I feel that it is an ideal location as I have six children and it is near shops, laundrette, Doctors which is in close proximity but we are not bothering anybody where we are either. I feel we live in harmony with our surroundings. If I didn't have this base I don't know what I would do. Val Smith the Education teacher [Outreach Officer] has visited me on site and also health visitors which the babies need. | Comments noted.  The Council does not consider there is a need to provide a transit site in the Borough. [The aim of the DPD is to identify an appropriate number of permanent sites in the Borough?]  All the sites included in the Issues and Options Report will be fully assessed during the next stage of the plan production. The Proposed Submission Report will set out which sites the Council considers to be suitable for permanent gypsy and traveller sites. | Questionnaire   |
| 2  | Mr and Mrs<br>Barlow   | Q3                      | It has come to my attention that you are considering the former car wash site near Maylands Fields as a permanent travellers site. I have contacted the Council in the past regarding the use of this site for several reasons. The position on the slip road makes this a very dangerous place for vehicles pulling on and off and I have witnessed several close encounters recently that could have ended very badly. Local people applied for a Right of Way in 2003 and Town Green status in 2007, both of which the Council have not acted upon. The adjoining fields are a Site of Metropolitan Importance for Nature Conservation. As such we think that no development should be allowed.  | Comments noted.  As noted in the comments submitted, this site (MY1) is adjacent to a Site of Metropolitan Importance for Nature Conservation (Ingrebourne Valley). The initial desk-based assessment of the site on page 54 of the Issues and Options Report incorrectly   | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response   | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
| 3  | Melanie<br>Batchelor   | Q3                      | We have been made aware of a consultation on the location of a permanent traveller site in Havering, and have discovered that one of the sites suggested is the former car wash site at the corner of Maylands Fields. As a homeowner [Harold Park] within the immediate vicinity of the proposed location, we would like to record our strong opposition to any such site. We are particularly concerned by the offhand manner in which the London Borough of Havering appears to have assessed the original application. In reviewing the considerations of the Development Planning Team we were surprised and disappointed to note that the site was considered to be neither:  • within or close to an area valued for its heritage; nor • within or close to a locally valued area  The Council's views on both these points are factually incorrect. The site borders on Maylands Fields which are: | states that the Maylands site is not within or close to a locally valued area (such as nature conservation sites) which is covered by local planning policy designations. This will be corrected during the next stage of the plan production when we will be undertaking a full and comprehensive assessment of all the sites using the three levels of questions (Planning and environmental constraints; Infrastructure and location; and Impact and deliverability).  Comments noted.  As noted above (2) we will correct the error regarding the locally valued area designation during the comprehensive assessment of this site. We will also consider the other issues raised by the respondent in the full site assessment. | Email / Letter  |
|    |                        |                         | within a Site of Metropolitan Importance for Nature  |  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|------------------------|-------------------------|---|--|-----------------|
|    |                        |                         | Conservation (SMI); and  within a Site of Importance for Nature Conservation (SINC)   |  |                 |
|    |                        |                         | The area has a unique and diverse, self-contained ecosystem which supports a number of protected species; most notably pippistrelle and noctule bats, water voles, kingfishers, great crested newts, slow worms, stag beetles and reptiles, to name but a few. Furthermore, the importance of this area to the local community can be seen by the initiatives which have been taken up in the recent past.  |  |                 |
|    |                        |                         | <ul> <li>Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them</li> <li>The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this</li> <li>The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection</li> <li>Local residents have fought to protect the fields from inappropriate development for nearly a decade</li> </ul> |  |                 |
|    |                        |                         | There are many reasons why this site is entirely inappropriate for a permanent traveller site and this was recognised by the Planning Inspector when he gave only a temporary permit to the existing traveller families. We hope in considering the proposal again you will take into account the points I have listed above and recognise the importance of this area to the local community both now and into the future as urban development further encroaches onto our shrinking Green Belt sites.                   |  |                 |
| 4  | Stephen Bath           | Q3                      | I would like to strongly object to a traveller site at Harold Park [Maylands]. This is ridiculous as I understand the former petrol garage was closed as it was a hazard to traffic coming off the M25 so surely this applies to the illegal car wash and the site where people appear to be squatting.   | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | <ul> <li>I have other issues with any change of use or with Havering's acceptance including the attached [below] from our Maylands preservation group.</li> <li>The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI);</li> <li>The fields are within a Site of Importance for Nature Conservation (SINC);</li> <li>Local residents have fought to protect the fields from inappropriate development for nearly a decade;</li> <li>The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection;</li> <li>The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.</li> <li>I strongly object. Harold Park is a lovely place to live. The Council, along with Thames Chase or the Forestry Commission, should purchase the site for the community and add it to the existing new forest protect which is excellent.</li> </ul> |  |                 |
| 5  | Mr and Mrs<br>Boddy    | Q3                      | We have lived in Maylands Way for nearly nine years and during that time we have actively fought to keep Maylands Fields the conservation area it has always been. It beggars belief that you are even contemplating turning the site into a permanent travellers site. During the last ten years the local residents have ascertained with the Council the following:  The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI); The fields are within a Site of Importance for Nature Conservation (SINC); Local residents have fought to protect the fields from   | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response   | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
| 6  | Mr and Mrs<br>Brady    | Q3                      | inappropriate development for nearly a decade;  The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection;  The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.  When the car wash was in use, there were many accidents from traffic on the M25 entering onto the A12 slip road as the entrance to the car wash was almost immediate. I cannot imagine the increase in accidents with the extra traffic a travellers site would cause.  My wife and I have lived in this area [Harold Park] since 1956, over 50 years and were amazed and shocked to hear that Maylands Fields has been mentioned as a possible site. Surely after all the upsets of 2002-5 this is not going to be so. When we first arrived in the area at Halidon Rise, the fields were freely accessible and a very popular area for people to exercise both themselves and dogs and even when we first arrived in Maylands Way in 1975 we were able to pass through our rear garden gate and into the fields. So wonderful to walk especially alongside the river and see the water voles and other wildlife at play. We know and you know that the fields are within a site of Metropolitan Importance for Nature Conservation (SINC). We have fought for years to protect the fields from inappropriate development. Rights of Way on the field were claimed as far back as January 2003 and the fields were claimed as a Town Green in November 2007 and there has been no action on either by the Council. The Council did however value the fields enough to protect its trees with a Tree Protection Order which I sincerely hope are still enforce. The local people particularly those in Maylands Way are worried and ready to fight for there rights and of course for the rights of the water voles etc, they don't vote but we do. | Comments noted.  Please see above (2 and 3).  The traveller site is adjacent to Maylands Fields not within the fields. | Email /Letter   |
| 7  | Brentwood<br>Borough   | Q3                      | We oppose any expansion of sites at Benskins Lane and Church<br>Road, Noak Hill since this would lead to Green Belt in the area overall  | Comments noted. All sites in these areas will be considered  | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
|    | Council                |                         | being further compromised. More generally, we would not wish to see any expansion of Green Belt sites such as that recently given planning permission on appeal at Brook Street Service Station, Harold Hill [Maylands site] particularly if this resulted in the site extending across the River Ingrebourne into Brentwood's Green Belt in South Weald.   | in line with the site assessment methodology set out in the Issues and Options Report.  |                 |
|    |                        | Q4                      | The methodology appears reasonable and robust.  | Comment welcomed.   |                 |
|    |                        | Q7                      | Were site selection to follow the proposed site methodology proposed in Table 2, section 4.50 of the consultation document and referred to above, the location may well have a bearing on whether pitches should be dispersed or concentrated. For example, we would not want to see any further concentration of pitches or expansion of sites near Navestock. An extremely sensitive location within the Green Belt, rural and isolated from any nearby settlement, any expansion of sites here is likely to adversely affect residential amenity, adding to existing problems owing to there already being several pitches in the vicinity. There is a need to avoid any further reduction in the openness of the Green Belt by preventing a series of Green Belt pitches granted due to very special circumstances at appeal or otherwise running between Havering, Brentwood and Epping Forest District. | Comments noted. The Council's preferred option is for pitches to be concentrated on existing sites / areas. Each site will be assessed to determine the potential impact on residential amenity and the openness of the Green Belt. |                 |
| 8  | Charlie Brown          | N/A                     | Questionnaire completed but no additional comments  | Noted.  | Questionnaire   |
| 9  | Kathleen<br>Brown      |                         | Questionnaire completed   | Comments noted.   | Questionnaire   |
|    |                        | Additional comments     | Been living here [Church Road] for 4 years. Children in school and with local doctor. Cess pit and water [on site]. Very happy and get on well with everyone here.  |   |                 |
| 10 | Rosie Brown            |                         | Questionnaire completed   | Comments noted.   | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response  | Submission type |
|----|------------------------|-------------------------|--|---|-----------------|
|    |                        | Additional comments     | Have lived here [Church Road] permanently for 5 years. Kids very happy and settled in local school and have registered with doctors. Temporary licence granted. Have electricity, water and cess pit and cannot be seen from the road. Get on well with local neighbours and other families that live here.  |   |                 |
| 11 | Tom Brown              | Additional comments     | Questionnaire completed  I've lived at this address [Church Road] for 18 months. My children are settled in school and are very happy and making friends. We've registered with the local doctor and get on very well with neighbours and other families that live here. Two of my sisters live on other plots and other family members live just around the corner.   | Comments noted.   | Questionnaire   |
| 12 | Joanne Bruce           | Q3                      | I have just been informed that it is being suggested to have a traveller site at the former car wash on the corner of Maylands fields. I would like to oppose this. The reasons being:  • The fields are within a Site of Importance for Nature Conservation;  • The residents have fought to protect the fields from inappropriate development for nearly a decade;  • Right of Way on the fields was claimed in 2003;  • The trees are protected with Tree Protection Orders;  • The road I live in backs onto the fields and I would be concerned that they would use this as a 'cut through' with their vehicles | Comments noted.  Please see above (2 and 3).  | Email / Letter  |
| 13 | Kirsty Buckley         | Additional comments     | Questionnaire completed  I think the area that we are in [Church Road] is an ideal location as there is minimum impact on neighbours as we only have one neighbour who doesn't have a problem with us being here now he has got to know us. We work together maintaining the road and he stops to chat to us. We are not too close to people that don't understand our way of life - you couldn't have horses and chickens   | Comments noted.  The Council will consider previous permissions and decisions by the Planning Inspectorate as part of the site assessment exercise. | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | and dogs in the middle of Harold Hill. It is English Travellers tradition to keep animals which keeps in with the Green Belt ethos. We are within walking distance to local shops etc. It was also noted in our first planning permission that the area in which we are located was recommended for a site by Planning Inspector Philip Major. I feel it would be best for us to stay here because all the electric, sewage etc has been paid by ourselves at no cost to the Council.  |  |                 |
| 14 | Deborah<br>Butler      | Q3                      | I am writing to protest about the proposal to make the former car wash site next to Maylands Fields a permanent travellers site. Why temporary permission was granted in the first place is beyond belief as it is entirely inappropriate for anyone to live there. Apart from the environmental impact of dumping waste onto Maylands Fields it is too dangerous to have cars / caravans leaving and entering the site. Several times I have narrowly missed cars pulling out from the site onto the slip road from the motorway to the A12. It will only be a matter of time before there is a serious accident.  I also find it incredible that the site is deemed not to be close to a locally valued area and not close to an area valued for its heritage. Maylands Fields are within a Site of Importance for Nature Conservation with protection orders placed on the trees. The Council are well aware of the local residents views in trying to protect the Maylands Fields and have ignored their claim for a Right of Way for the past ten years.  I have lived in Maylands Way for over 20 years and most of my immediate neighbours have lived here since the houses were first built. I do value the area I live in and hope that my views and those of | Comments noted.  Please see above (2 and 3). | Email / Letter  |
| 15 | Eileen Carlin          | Q3                      | the other residents will be taken seriously.  I am writing to express my disgust at and to object to your decision to  | Comments noted.                              | Email / Letter  |
|    |                        |                         | consider the Maylands Fields as a possible travellers site. This site is close to an area valued for its heritage and is within a locally valued area. The fields are within a SMI. The fields are within a SINC. We,  | Please see above (2 and 3).                  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | the local residents have fought to protect this area from inappropriate development for over a decade. You, the Council have placed Tree Protection Orders on this area. There are current right of way claims outstanding on this area. This area has been claimed as Town Green.   |  |                 |
| 16 | Mr and Mrs<br>Clapham  | Q3                      | We are writing to lodge our objection against the possible permanent traveller site on the former car wash site on the corner of Maylands fields. Our basis for objection is as follows; The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). The fields are within a Site of Importance for Nature Conservation (SINC). Local residents have fought to protect the fields from inappropriate development for nearly a decade. The Council itself valued the fields enough to protect its trees with a Tree Preservation Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.  The former car wash site is the first thing that the public see when entering the boundary of Romford. This reflects badly on our town as the traveller site currently on the former car wash is unkempt and unsightly giving a bad first impression of the borough. This site was never meant as a place of residence and residential status should not be permitted in any way. | Comments noted.  Please see above (2 and 3). | Email / Letter  |
| 17 | Alan Clark             | Q3                      | The alleged suggested planning approval for a Travellers Site on the old car wash site is totally unacceptable. My reasons for objection are as follows:  The site is within an Area of Importance for Nature Conservation.  Tree Conservation Orders were ignored and the Council DID NOTHING to punish the offender.  Rights of Way on the fields were claimed and the Council   | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response  | Submission type |
|----|------------------------|-------------------------|--|---|-----------------|
|    |                        |                         | <ul> <li>DID NOTHING.</li> <li>The fields were claimed as a Town Green and the Council DID NOTHING yet again.</li> <li>Local residents have fought to protect the fields from inappropriate and unauthorised development for almost a decade now. What have the Council done? NOTHING</li> </ul>   |   |                 |
| 18 | Coal Authority         | N/A                     | No specific comments to make at this stage.  | Noted.  | Email / Letter  |
| 19 | Jean Cobb              | Q3                      | Your assessment of this site is completely wrong. It is close to an area valued for its heritage, and it is close to a locally valued area. The ex-car wash area is immediately adjacent to Maylands Field which is an SMI and a SINC Residents of Harold Park have made   | Comments noted.  Please see above (2 and 3).  | Email / Letter  |
|    |                        |                         | their views perfectly clear throughout the past eight years, which Havering Council has totally ignored. It is high time they supported their residents. We need a town green on Maylands Field without a permanent travellers site literally a few feet away.   |   |                 |
| 20 | Mr and Mrs<br>Cooke    | Q3                      | Once again I am writing about Maylands Fields and the former car wash site, which only had a temporary permit to stay. The site is an eyesore with large slabs of concrete around it and in front of gates on highways land. We still have to be mindful of cars and vans coming out when using the slip road, which can be very dangerous. As for Maylands Fields they are important and valued areas. It was the Council itself that valued it enough to protect trees with Tree Protection Orders. Rights of Way on the fields were claimed in January 2003 and you have taken no action. The fields were also claimed as a Town Green in November 2007. Yet again the Council have chosen to take no action. These fields should be of benefit to the residents and for Nature Conservation. | Comments noted.  Please see above (2 and 3).  | Email / Letter  |
| 21 | CPRE                   | General                 | No local authority sites for temporary or permanent use should be designated within the Green Belt. Reasons:  • In the interest of fairness and equitable treatment of all other residents and interested parties.  • To maintain the integrity of the permanent Green Belt  | The Council supports the view that local planning authorities should only ever allow development in the Green Belt in genuinely exceptional circumstances and that this | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response  | Submission type |
|----|------------------------|-------------------------|--|---|-----------------|
|    |                        |                         | boundary as consulted upon, approved as sound and set out in the Local Development Framework DPD.  To prevent the growth of unplanned settlements within the Green Belt contrary to borough, regional and borough policies.  To protect the enjoyment of everyone using the Green Belt for recreation, leisure and other bona fide countryside-related purposes identified in borough, regional and borough policies.  To protect agricultural land and maximise food security for a rapidly growing population.  To protect existing, and possible future, Sites of Interest for Nature Conservation from damage.  To protect Green Belt landscape and views.  Approval of permanent and temporary residential sites should continue to be resisted by rigorous application of the test for very special circumstances. Site approvals, where unavoidable, should continue to be for specified temporary periods of time and restricted to named individuals. Positive evidence of search for sites within the urban area should be rigorously applied. Reason:  These are the only means of control of gypsy and traveller Green Belt use available to the local planning authority. | should apply to gypsy and traveller sites as well as al other forms of development.  Green Belt land should only be allocated for gypsy and traveller sites in 'very special circumstances'. The Council considers that Green Belt sites should only be designated in Local Development Documents for existing residents or locally connected travellers, solely for that purpose and with no business use on the site. |                 |
|    |                        |                         | Local authority sites should only be designated within the urban area and only at locations where the amenity of existing residents will not be affected. Reasons:  • It is possible to identify, and reasonable to designate, such sites; for example at industrial urban fringe locations.   | The Council is not proposing any local authority run sites for gypsies and travellers. No sites within the urban area have been identified or put forward during the Call for Sites or  |                 |
|    |                        |                         | In the interest of sustainable and efficient provision of local authority and other utility services.  | Issues and Options consultation.  |                 |

| ID | Name /<br>Organisation  | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|-------------------------|-------------------------|---|--|-----------------|
|    |                         |                         | <ul> <li>Access to all facilities and services is as good, or better than,<br/>access from Green Belt sites.</li> </ul>   |  |                 |
| 22 | Craig and Sally Dearman | Q3                      | We write to you in objection to the proposal that the above mentioned location is given permanent traveller site status. What worries us most is that London Borough of Havering appears to have assessed the site in completely the wrong way, including:  Is the site within or close to an area valued for its heritage?: NO Is the site within or close to a locally valued area?: NO  It defies belief that the Council can make this assessment knowing that the site borders on Maylands Fields, and knowing:  • The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI).  • The fields are within a Site of Importance for Nature Conservation (SINC).  • Local residents have fought to protect the fields from inappropriate development for nearly a decade.  • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection.  • Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them.  • The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.  • The area in question appears unsightly and is not kept clean or tidy.  Residents' views on Maylands Fields have been totally ignored for a decade by the Council which has taken only very limited action only | Comments noted.  Please see above (2 and 3). | Email / Letter  |
|    |                         |                         | when forced to do so by intense pressure from residents. Now it   |  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response | Submission type |
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|    |                        | _ r aragrapii           | appears to be saying that Maylands Fields is not an area valued by residents - IT IS.  |                  | , type          |
|    |                        |                         | What possible positive reasons can you give to grant this area permanent traveller site status? What benefit would it bring to nearby residents? What would be the impact on local wildlife and conservation issues? |                  |                 |
| 23 | Jan Derewicz           |                         | Questionnaire completed  | Comments noted.  | Questionnaire   |
|    |                        | Q1                      | If the 25 unauthorised pitches are authorised then the additional 40 pitches required 2010 - 2027 seems correct. Pitches should only be used by families already living in the Borough.                              |                  |                 |
|    |                        | Q3                      | Sites close to locally valued areas should not be submitted or considered as a Gypsy and Traveller site.   |                  |                 |
|    |                        | Q4                      | If all foregoing constraints above are strictly adhered to then it should be a reasonable assessment.  |                  |                 |
|    |                        | Q6                      | We definitely agree that 1A [14 pitches] is the correct policy at this time.   |                  |                 |
|    |                        | Q7                      | Option 2A is correct but the new pitches erected and area involved must be closely monitored by Havering.  |                  |                 |
|    |                        | Additional comments     | If the vital planning matters are adhered to and no development is permitted on the Green Belt (fringes or internal pockets).  |                  |                 |
|    |                        |                         | Only existing families already living in the Borough and their direct expansion should be accommodated within Havering.  |                  |                 |
|    |                        |                         | Existing sites should be considered first for this expansion; especially if there have been no relevant objections up to this point.   |                  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response   | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | Whilst appreciating accommodation sites for Gypsy and Travellers must be met, Havering must insist on no overspill from other areas outside the Borough.   |  |                 |
| 24 | P. Dessoy              | Q3                      | Proposals for temporary permission for [Sites] UP1 and UP2 are on valuable Green Belt land and should be retained as Green Belt and under no circumstances should anybody be allowed to despoil, encroach or live on this land. This land is the lungs of London and surrounding areas. It is our duty to ensure it survives for future generations to come. Once taken from this purpose Green Belt land will never be released back to the people of the area.   | Both sites have already been granted temporary permissions. They will be assessed in line with the criteria set out in the Issues and Options Report to consider their acceptability for permanent permission. Green Belt land will only be allocated for gypsy and traveller sites in 'very special circumstances'. | Questionnaire   |
| 25 | English<br>Heritage    | Appendix F              | We welcome as part of the Level 1: Planning and Environmental Constraints reference to the need to protect the Boroughs heritage assets and settings of conservation areas, listed buildings and schedule monuments. We would suggest for completion and compliance with Planning Policy Statement 5: Planning for the Historic Environment, that all designated heritage assets are included in the assessment process, such as registered parks and gardens and archaeology. In addition the broader historic environment should be carefully considered, especially buildings, structures, landscapes and townscapes of local historic interest, that could be classed as heritage assets (as defined by PPS5 and the new replacement London Plan (2011)).  At the Level 3: Impact, Design and Deliverability, we would seek to ensure that a through analysis of the impact of the development upon the historic interest of the site and its surroundings is undertaken. This includes consideration of all heritage assets, in particular known or yet to be discovered archaeology. | Comments noted.  The Council will consider all designated heritage assets in its assessment of the sites. In addition, we will consider the impact of proposed sites on local character and appearance of the surrounding area as set out in Level 3 of the site assessment criteria.                                | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response  | Submission type |
|----|------------------------|-------------------------|--|---|-----------------|
|    |                        |                         | One of the key broad objectives of the DPD (paragraph 5.9) should be to conserve the Borough's heritage assets including their settings, in line with Core Strategy CP18, London Plan policy 7.8 and PPS5. It is noted that various options have been proposed with regards to the number of sites, their distribution and function. In general we would reiterate the need to conserve the Borough's heritage assets when identifying specific sites, and not to cause harm to their significance. This includes consideration of their setting and elements of the historic environment that may not be designated heritage assets, but still contain historic interest. |   |                 |
| 26 | Environment<br>Agency  |                         | We particularly support the following statements:  | Support welcomed.   | Email / Letter  |
|    |                        | Para. 4.13              | Sites should not be located on [or] in close proximity to known hazards, such as contaminated land or areas at high risk of flooding.  |   |                 |
|    |                        | Para. 4.20              | Gypsy and Traveller sites would not be acceptable where they would likely have and adverse impact on a SSSI.   |   |                 |
|    |                        | Para 4.21               | Flood Zones.   |   |                 |
|    |                        | Q3                      | Of the proposed sites, we have comments to make on three of them, we do not have any specific concerns or restrictions for the other sites.  | Comments noted. These will be considered in the site assessments. |                 |
|    |                        |                         | UP3 This site includes a pond and an ordinary watercourse. A 5 metre buffer zone should be created around the pond and along the ordinary watercourse. This zone should be left free of any structures or formal landscaping and should be delineated with a fence and native hedge.   |   |                 |
|    |                        |                         | WD pitches   |   |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response | Submission type |
|----|------------------------|-------------------------|---|------------------|-----------------|
|    |                        |                         | This site is located in a Source Protection Zone 1 around a potable water abstraction borehole. In such a location we would recommend planning conditions that would only allow clean roof drainage to drain to soakaway, and then only in areas where it has been demonstrated that there is no contamination. All other surface water and all foul drainage must be connected to public sewer.  |                  |                 |
|    |                        |                         | MY1 This site is adjacent to the river Ingrebourne. The current site is within 8 metres of the top of bank. Any permanent planning permission which grants the development of MY1 should ensure that the full 8 metre buffer zone is achieved including moving the current hardstanding back to provide the full width. The buffer zone should be demarcated with a fence and native hedge on the landward side of the fence. Although this site is partly in Flood Zone 2 and borders Flood Zone 3, we consider this site to fall in Flood Zone 1 based on the result of more detailed modelling which we are aware of. This site is a former petrol filling station. It is also located on a Secondary Aquifer and is adjacent to a surface watercourse. If permanent planning permission was applied for, we would recommend planning conditions to ensure that any necessary remediation was carried out and to ensure that the site drainage was acceptable. |                  |                 |
|    |                        |                         | The buffer zones we mentioned under UP3 and MY1 should be appropriately managed for wildlife in the longer term. All proposed developments should seek to enhance biodiversity. Planning Policy Statement 9 (PPS9) requires that planning decisions should prevent harm to biodiversity interests and should seek to enhance biodiversity where possible. Article 10 of the Habitats Directive and paragraph 12 of PPS9 stress the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way. Moreover, the Water Framework Directive (2000/60/EC) aims to improve the whole water environment.  |                  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph               | Comments  | Council Response  | Submission type |
|----|------------------------|---------------------------------------|---|---|-----------------|
|    |                        |                                       | We are the competent authority in England and Wales responsible for delivering the WFD through the Environment (WFD) (England and Wales) Regulations 2003. The WFD needs to be taken into account in the planning of all new activities in the water environment. The WFD requires that Environmental Objectives are set for all surface and ground waters in each EU Member State. The objectives are laid out in the Thames River Basin Management Plan and are divided into waterbodies.   |   |                 |
|    |                        | Q4                                    | We feel that Table 2 should have a point to say that sites will be preferred in locations which will not have a detrimental effect on watercourses or biodiversity.   | Table 2 provides a summary of the factors to be considered in the site assessment methodology. Biodiversity and watercourse issues will be considered in the full assessment process. |                 |
|    |                        |                                       | In addition to the above we have the following suggestions and advice:  |   |                 |
|    |                        | Para 4.25                             | We support the reference to steer these developments away from contaminated land and the use of planning conditions to remediate contamination. It would be useful to add that developments on contaminated land that pose a risk to polluting controlled waters could be required to remediate the land under planning conditions. This would be in addition to any requirements from a human health aspect.   | Noted. This will be considered in the site assessment and development of the Proposed Submission Document.  |                 |
|    |                        | References<br>and Further<br>Guidance | Planning Policy Statement 23 (PPS23: Planning and Pollution Control) and the Water Framework Directive should be added to the list of Further Guidance on page 32 [of the Issues and Options Report]. As each site goes through the planning process we would expect the development to follow the guidance of PPS23 and CLR11 with regards to the potential risk to groundwater, and the general requirements for land contamination and drainage. Sites should be connected to the foul sewer if possible. If this is not possible then they should be connected to a sewage package plant to treat the | Comments noted. Both will be added to the List of Further Guidance in the Proposed Submission Report.   |                 |

| ID | Name /<br>Organisation               | Question /<br>Paragraph | Comments  | Council Response   | Submission type |
|----|--------------------------------------|-------------------------|---|--|-----------------|
|    |                                      |                         | effluent. Depending on the output of these sewage package plants and whether they go to land will determine whether they need to be registered with us. For more information please refer to our website at: <a href="http://www.environmentagency.gov.uk/research/planning/33710.aspx">http://www.environmentagency.gov.uk/research/planning/33710.aspx</a> .  |  |                 |
| 27 | Epping Forest<br>District<br>Council | Q7                      | The preferred option is 2A, i.e. concentration within the existing nine sites. This would also apply to any transit site in the Borough, should that become a reality. The main reason for this choice is that we have experienced some problems with Gypsy and Traveller sites on the boundary with Brentwood where different priorities for enforcement of unauthorised sites between the authorities can lead to unsatisfactory outcomes. Your option of concentration would prevent the possibility of this occurring on our shared boundary, as there are currently no Gypsy and Traveller sites in that area.   | Comments noted.  This is the Council's preferred approach. | Email / Letter  |
| 28 | Frances<br>Fetterroll                | Q3                      | Havering appear to have assessed the [Maylands] site in completely the wrong way, including:  Is the site within or close to an area valued for its heritage?: NO Is the site within or close to a locally valued area?: NO  There are many reasons why this site is entirely inappropriate for a permanent traveller site, this was recognised by the Planning Inspector when he only gave a temporary permit to the existing traveller families, also the following are reasons not to grant permission on a site that borders on Mayland Fields:  1. The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI)  2. The fields are within a Site of Importance for Nature Conservation (SINC)  3. Local residents have fought to protect the fields from inappropriate development for nearly a decade. | Comments noted.  Please see above (2 and 3).               | Email / Letter  |

| ID | Name /<br>Organisation            | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|-----------------------------------|-------------------------|--|--|-----------------|
|    |                                   |                         | <ol> <li>The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection.</li> <li>Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them.</li> <li>The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.</li> <li>Residents' views on Maylands Fields have been totally ignored for a decade by the Council which has taken only very limited action only when forced to do so by intense pressure from residents. Now it appears to be saying that Maylands Fields is not an area valued by residents.</li> <li>As the above points show we are concerned and have been for a very long time. Please reconsider the site for this purpose and at least reconsider the points 5 and 6 instead.</li> </ol>         |  |                 |
| 29 | Stephen and<br>Rosalind<br>Fraser | Q3                      | We would like to raise a complaint that you are even considering this [Maylands site] after all the hard work done by the local community – whom you serve – to ensure that this area retains its Green Belt status. It is beyond belief that you have made an assessment of the site which answers 'no' to both questions;  • is the site within or close to an area valued for its heritage; • is the site within or close to a locally valued area?  You are aware that the site is within an SMI, SINC and that local residents have been fighting for 10 years to protect it. We have received no answers to our claims of Rights of Way to the fields (in January 2003). It appears you have taken no action on this and Town Green (November 2007) again no action The consequences of allowing this site to be a permanent residence will have disastrous knock-on effects in the future as follows: | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response   | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | <ul> <li>The destruction of the fields;</li> <li>The huge amounts of money it will cost to remove the inevitable illegal caravans that will arrive on the back of this.</li> </ul>   |  |                 |
|    |                        |                         | Please think again and do not allow this to happen.  |  |                 |
| 30 | Annie Friend           |                         | Questionnaire completed  | Comments noted.  | Questionnaire   |
|    |                        | Additional comments     | I have lived at this address [Church Road] for approximately 5 years.  I have electric, water, cess pit and cannot be seen from the road.  [We] get on well with local neighbours and the kids settled well into school. Also have temporary licence for 5 years.  |  |                 |
| 31 | GLA                    | General                 | As you are aware, the Mayor in his London Plan 2011 has not set any specific target with regards to Gypsy and Traveller sites. It is considered that Boroughs are best placed to assess the needs of, and make provision for these groups at the local level. The Mayor is content that Havering Council proceeds with its development of its DPD with the purpose of allocating suitable sites for gypsies and travellers in Havering in line with national policy. The Mayor will issue his formal opinion on general conformity when requested at presubmission stage.  | Noted.   | Email / Letter  |
| 32 | Heine<br>Planning      | Q1                      | Questionnaire completed  We have not been provided with a copy of the 2010 update report so  | The findings of the 2010   | Email / Letter  |
|    |                        |                         | it is not possible to comment in a meaningful way not knowing the details of this study. Without details of what pitches are being considered it is impossible to agree with the assessment. It is not clear what if any public consultation/scrutiny or sustainability assessment this study has been subject to. Not knowing what sites are referred to I am unclear how the Council can rely on sites with temporary permissions to meet need to 2015. I suspect the consents for most will expire before then and in the case of Ashlea on Tomkyns Lane the Council has only recently renewed (again) for a 2 years consent which will expire before 2015. Circular 1/2006 makes clear | update to the Havering Gypsy and Traveller Needs Assessment are set out in the Issues and Options Report (paragraphs 3.39 - 3.41 and Table 1). Paragraphs 3.40 and 3.41 of the Issues and Options report state that the additional pitches are based on the best practice guidelines of 3% per |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
|    |                        |                         | that temporary consents do not set a precedent and can not be relied on to meet need. The 31 pitches with temporary consent should be included as a current shortfall as there is no guarantee they will be renewed. The current immediate shortfall should be 31 (temporary) plus the 25 identified i.e. 56. The need to 2015 should be 56 plus household formation i.e. minimum 64. I am unclear where the 40 for household formation in para 6.3 comes from but presume it is family formation to 2015 of 8 and additional pitches 2016 to 2027 of 32. It is not clear from Table 1 that additional pitches 2016-27 of 32 pitches is all household formation. The assessment fails to include provision for:  • In migration-traditionally sites in Havering have had to be found to meet the needs of Travellers moving from other parts of Gt London and Essex;  • Movement from families in housing to which some weight should be given due to the high number of families in housing in the metropolitan area;  • Household formation from current unauthorised sites.  As such it may understate need generated from all sites. It should be made clear that any need identified is a minimum need and not a maximum figure which can not be exceeded. Recognition that there is a pressing, current unmet need which must be met immediately is | annum household growth rate and this was applied to all sites in Havering, including unauthorised, at the time of the needs assessment. |                 |
|    |                        | Q2                      | welcomed.  Unaware of any other suitable sites but Maylands now has temporary consent.  | Noted.  |                 |
|    |                        | Q3                      | All sites occupied by gypsies and travellers are understood to be deliverable as they are available, affordable, accessible for the purposes sought and can be provided at no additional expense to the local authority.  | Noted.  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response   | Submission type |
|----|------------------------|-------------------------|---|--|-----------------|
|    |                        | Q4                      | This all seems a bit false and academic seeing as how the call for sites identified only existing sites. All these sites would fail to meet the first consideration as they are all in the Green Belt. Some may struggle to meet other considerations such as environmental amenity for sites alongside the M25. Some are not well located to access services without reliance on a car but any journey in Havering is likely to be relatively short. This does not seem a very relevant consideration in such a small and compact district where no land is that far from services and amenities. I doubt any site would ever be rejected for this reason and question the need to include this. It is hard to reconcile a desire to be within settlements and protect the amenities of other residential properties. The Sustainability Appraisal fails to identify any other sites considered and rejected. The document may not be considered sound without this information. We are told in para 6.4 that the Council was unable to identify any suitable sites within the built up area but we are not provided with a list of the sites considered and rejected and/or why. Without this information applications for future sites in the Green Belt are likely to be challenged by those not convinced that all other options have been properly considered and rejected with good/ valid planning reasons. | Additional sites at Church Road (CR1-CR4 and CR13) and Willoughby Drive (WD2) were put forward during the Call for Sites and were included in the Issues and Options Report. These, together with additional sites put forward during the Issues and Options consultation will be considered in the preparation of the Proposed Submission Document. |                 |
|    |                        | Q5                      | I am not clear what the final objectives concerns, namely: To provide specific criteria about the form of development which will be allowed on each site to ensure the land use is appropriate within the constraints of the local area. It is not clear what you have in mind and why this could not be addressed by condition.  | The Proposed Submission Document will set out site specific criteria. Conditions may still be imposed when determining any applications  |                 |
|    |                        | Q6                      | 1C - although I do not understand where the figure of 56 comes from. I am not sure I have understood your intentions but I simply cannot understand how or why you are suggesting that you only provide 14 new pitches during the plan period when your need assessment identifies a minimum need of 65 pitches To justify this concern to protect the Green Belt ignores the option or removing land from the  | The Council is not proposing to release any land from the Green Belt. The DPD seeks to allocate sufficient land to meet the accommodation needs of gypsies and travellers living in  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
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|    |                        |                         | Green Belt or the significant weight to be attached under current policy to unmet need. The objectives of the exercise are to make proper and adequate provision to meet existing and projected need. How will this be achieved if you only identify land for 14 pitches when you identify a need for 65 pitches? Why bother doing a need assessment if you have no intention of meeting the need you identify? It is unclear why the Council is only considering Green Belt land. Surely land is to be found for housing within settlement boundaries. Why is this not being considered suitable for travellers? If sufficient land is not available the Council should consider removing land from the Green Belt. Why is this not an option? Several sites adjoin the settlement boundary and could easily be removed from the Green Belt. Option 1A would not address the first objective identified by the Council i.e. to support the removal of unauthorised development. PPS3 requires local authorities to identify land suitable to meet a five year supply. The DPD would not be policy compliant if it failed to allocate sufficient land for future growth and household formation. An option that fails to meet current need let along future need is surely bound to fail at the first hurdle? | Havering while protecting the Green Belt from inappropriate development except in very special circumstances. No non-Green Belt sites have been identified or put forward during the preparation of the DPD. The Council considers that its preferred approach strikes the right balance between housing gypsies and travellers living in Havering at the time of the needs assessment and only allocating Green Belt land where this is justified by very special circumstances. The Council does not consider that future growth and household formation does not amount to the very special circumstances for inappropriate development in the Green Belt. |                 |
|    |                        | Q7                      | It makes good sense to look to increase provision within existing sites or small extensions of existing sites where possible. But, as with housing provision there is a need to provide choice and the Council should also look to provide additional pitches in other areas that are not in the Green Belt, as part of housing allocations/ developments. Given the need for 65 additional pitches by 2021 it is unclear why you believe providing sites in other parts of the district could place a strain on infrastructure and other public services in the area. This needs to be explained. I doubt the same is said of housing need.  | No additional sites outside of the Green Belt were put forward for consideration.   |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
|    |                        | Q8                      | There is a need for transit provision. Few travellers now attempt to stop on the road side. Many will seek out family sites or private touring caravan sites where they exist and where owners will accept them. For this reason many Council's are unaware of the extent to which Travellers are passing through their district. Travellers rarely move in large groups any more due to the need to avoid detection. The Council should consider allowing an element of transit provision on existing sites. In my experience most Travellers try and stop with families and friends when travelling for obvious reason (no site fees, security and company). Small family sites should be allowed to have a small transit area for 1-3 touring caravans where family and friends could stop for up to 2-3 months. This would substantially reduce any need for transit provision, would avoid conflict with other land uses on whose land transit use may take place, and would be provided and managed by the travelling community at no expense to the Council. | As set out in the Issues and Options Report (see paragraph 6.8) the Council does not consider there to be a need for a transit site in Havering. The majority of respondents to the Issues and Options consultation, including a number of traveller families, supported this approach. |                 |
|    |                        | Q9                      | Monitoring should also include for the need to update the 2010 GTAA on a regular basis to address issues of overcrowding, concealed need and household formation otherwise you will not know of sufficient pitches are being created. This should be included as a third indicator as noted in para 7.7 but should not be linked solely to the review of the DPD which may take some time to be adopted. It is not clear what interim/ transitional arrangements are to be put in place until the site allocation DPD is adopted.   | The two proposed indicators are considered appropriate measures to assess the effectiveness of the DPD. A review of the GTAA is considered to be undertaken in line with a review of the DPD (every five years).  |                 |
|    |                        | Additional comments     | The preparation of a site allocation DPD is welcomed but it is long overdue. I have had difficulty understanding the figures in this document. I suspect others, in particular Members of the Gypsy-Traveller community are expected to understand or follow this document and what is proposed. It would have been helpful if the sites referred to in Table 1 could be listed i.e. those with permanent consent, those with temporary consent (and until when), those likely to get temporary consent (and until when) and those not likely to get  | Comments noted.   |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|------------------------|-------------------------|---|--|-----------------|
|    |                        |                         | consent. Without this information no one can comment in any meaningful way on the assessment made. Volume house builders can pay to retain consultants to comment on policy documents like this. The Gypsy community can not afford to do the same. This consultation process relies heavily on the goodwill of voluntary organisations/unpaid consultants like myself to take time out of our busy schedules to respond. It would be helpful if the process could be made easier. Some of this document and the accompanying Sustainability Appraisal seem irrelevant, superfluous and unnecessary. Crucial information appears to have been omitted. I feel the whole process is being made unnecessarily complicated. If, as would appear to be the case, the call for sites has identified no sites outside the Green Belt/not already occupied you are now vindicated to make permanent all existing sites. Let's not beat about the bush but do something positive, proactive and sensible to address this issue without further ado. There is a danger the process will become |  |                 |
|    |                        |                         | overcomplicated and will never be implemented.  |  |                 |
| 33 | Highways<br>Agency     | N/A                     | No comments on the document at this time.   | Noted.                                       | Email / Letter  |
| 34 | Colin Hunt             | Q3                      | This site [Maylands] is entirely inappropriate as it is close to an area valued for its heritage and a locally valued area. Also, access to and from the site is considered hazardous as it is on the slip road from the M25. We as local residents [Harold Park] have campaigned for 10 years to get Maylands Fields recognised as an area of Nature Conservation and a Town Green but have been ignored by the Council. Despite the fact the trees have been valued enough by the Council to have a Tree Protection Order placed on them.   | Comments noted.  Please see above (2 and 3). | Email / Letter  |
| 35 | Carol Liuzzi           | Q3                      | I have lived I this area [Harold Park] all my life and have always thought that this was Green Belt land and that, as such, nothing could be built on it. There are not enough open spaces in Havering and this site [Maylands] should be left alone. The caravans that are parked illegally on the former car wash site should be removed at once. Harold Wood and Harold Park are small, quiet areas and are  | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation            | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|-----------------------------------|-------------------------|--|--|-----------------|
|    |                                   |                         | not conducive to having a travellers' site in their midstThe site is also very unsuitable as the entrance is on the slip road from the A25 and it would be very dangerous.   |  |                 |
| 36 | Margaret and<br>Terry<br>Loveland | Q3                      | We are very much against the suggestion that Maylands Fields should be used as a permanent Traveller Site. There are much better uses for it. The Council seems to have dragged its feet for almost 10 years over the use of this site. It allowed the car wash to remain in existence long after a warning had been given that the car wash must be removed and the site must not be used for commercial purposes. The field is between Havering and Brentwood and should be used for Nature Conservation. We know that trees on the site have a Protection Order on them. Rights of Way have been claimed on the fields and a Town Green was suggested in 2007. The Council have done nothing about either of these suggestions. It is difficult to understand why these fields are not being protected for public leisure and recreation purposes, as we understand that they are within a Site of Metropolitan Conservation. It seems that the owners of Maylands Fields are making a laughing-stock of Havering Council, as it must appear that the Council has little or no power to stop what must be a very unsuitable use of the site. It seems to be actively encouraging a course of action which is surely not in keeping with the wishes of the majority of Havering residents. | Comments noted.  Please see above (2 and 3). | Email / Letter  |
| 37 | Maylands<br>Action Group          | Q3                      | I think you will find that the vast majority of residents living in the immediate vicinity of this site [Maylands] would consider it wholly inappropriate for occupation by Travellers. Indeed I was extremely shocked and disappointed to learn that those Travellers already occupying the land had received a temporary stay there. Residents have been campaigning against the site's unauthorised use, and subsequent occupation by Travellers, for almost a decade – and have formed an Action Group to purposely highlight the value of the wider Maylands Fields area. Thus, given these factors, and the protracted correspondence Havering Council has had with residents/the Maylands Action Group on this matter, it is disappointing in the   | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response | Submission type |
|----|------------------------|-------------------------|---|------------------|-----------------|
|    |                        | • • • • • • • •         | extreme that it would still include this site in its consultation document - when clearly this proposal already has no support within this community. In view of the foregoing, I am especially disappointed that Havering Council has presented this proposal incorrectly. In your consultation you pose the following questions, and answer no to both:  • Is the site within or close to an area valued for its heritage? • Is the site within or close to a locally valued area?  Both answers are clearly incorrect and misleading, as the proposed site borders Maylands Fields, which is both a SMI and SINC (Site of Metropolitan Importance for Nature Conservation and a Site of Importance for Nature Conservation). And as previously stated, the Fields adjoining the site are valued. The following examples of community action clearly demonstrate this:  • Local residents have fought to protect the fields from inappropriate development for nearly a decade; • The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection; • Rights of Way on the fields were claimed in January 2003; • The fields were claimed as a Town Green in November 2007.  These issues alone should invalidate the sites selection, as its value has been understated in your consultation document. Moreover, slow | Council Response |                 |
|    |                        |                         | moving vehicles (such as those towing caravans) entering and exiting the site, at such close proximity to the off slip from the M25 to A12, would seem foolhardy in the extreme. I would hope, upon review of the above, you would now remove the site in question from the consultation process.   |                  |                 |
| 38 | Janet Mitchell         |                         | Questionnaire completed   | Comments noted.  | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph                | Comments  | Council Response  | Submission type |
|----|------------------------|--|---|---|-----------------|
|    |                        | Additional comments                    | I've lived at this address [Church Road] for 4 years. It's a permanent home for me and my 4 children. [The site] cannot be seen from the main road. We have our own cess pit and water and the kids are happy and settled in school and registered with the local doctor. Very settled and get on very well with all other families.  |   |                 |
| 39 | Natural<br>England     | Para. 4.13                             | Paragraphs 4.13 to 4.19 refer to sites not being considered in areas that are generally inappropriate for residential use, including the Green Belt. This is welcomed and to be encouraged but seems to be at variance with the Sustainability Appraisal.  Table 1: Summary of Indentified Sustainability Environmental Section (g) Protection of designated areas (nature, conservation, heritage) Sites of conservation value and heritage designation should be protected, and criteria for site assessment clearly defined to ensure that development sites avoid these areas in particular, and minimise adverse effects on surrounding areas in general.  Development pressure should be directed away from designated sites and encouraged on brownfield land; sites within the Green Belt should only be authorised in exceptional circumstances.  The Issues and Option Report provides greater clarity in respect of this issue, the Council may wish to consider revising this section to more fully comply with PPS 2 and the main consultation document.  The reference to Sites of Special Scientific Interest (SSSI's) in paragraph 4.20 is also welcomed and supported.  Table 1: Summary of Identified Sustainability Issues | The Issues and Options Report and Sustainability Appraisal both state that sites within the Green Belt will only be authorised in exceptional circumstances.  No brownfield land has been identified or put forward during the Call for Sites or Issues and Options consultation. | Email / Letter  |
|    |                        | Interim<br>Sustainability<br>Appraisal | The Environmental issues referenced under sections G, H and I are acknowledged and welcomed subject to the comments above.  | Support welcomed.   |                 |
|    |                        |  | Appendix C – Sustainability Appraisal Framework   | Support welcomed.   |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph          | Comments  | Council Response  | Submission type |
|----|------------------------|----------------------------------|---|-------------------|-----------------|
|    |                        | Interim Sustainability Appraisal | The seventeen objectives referenced here are broadly supported, especially;   |                   | ,               |
|    |                        | , ppraida                        | <ul><li>9) Maintain and enhance biodiversity;</li><li>11) Improve air quality and reduce contributions to Climate Change;</li><li>12) Improve the quality of the built and natural environment.</li></ul>   | Support welcomed. |                 |
|    |                        |                                  | Overall the approach and methodology used are appropriate and in line with the advice that would be offered by Natural England, this topics and issues covered is also in line with those that Natural England would wish to see considered in such a document.   |                   |                 |
|    |                        | General                          | The following general information is offered to provide general advice to Havering Borough Council, rather than addressing any specific issues in respect of this document  |                   |                 |
|    |                        |                                  | Local wildlife sites If any proposed sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.  | Comments noted.   |                 |
|    |                        |                                  | Protected species If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 provide information on BAP and protected species and their consideration in the planning system. |                   |                 |
|    |                        |                                  | We would draw the Council's attention to our protected species standing advice [on the Natural England website], which provides guidance on when protected species may be impacted by a proposal.   |                   |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response  | Submission type |
|----|------------------------|-------------------------|--|---|-----------------|
| 40 | Stephen<br>Nixon       | Q3                      | It has just come to my attention that there is a possibility that you may be considering making the [Maylands] site a permanent gypsy site. I hope this is not the case as this will only confirm to me that no one at Havering Council takes the issues with this area seriously. | Comments noted.  Please see above (2 and 3).  | Email / Letter  |
| 41 | Miles<br>O'Connor      | Q3                      | Questionnaire completed  Sites at Lower Bedfords Road (LB1-4) recommended to be put forward. All are close to schools, buses and facilities (utilities).   | All these sites will be fully assessed during the next stage of the plan production.  | Questionnaire   |
|    |                        | Q5                      | The plan needs to consider the individual circumstances of the families (Doctors, Hospitals, Medication etc.).   | The plan is a land-use/spatial planning document which will designate sites in appropriate locations for gypsy and traveller families. The plan has to consider the principle of development. It is not the role of the plan to look at the individual medical circumstances of families currently living on sites. |                 |
|    |                        | Q8                      | Transit sites can cause friction with the established traveller and local communities.   | Comments noted.   |                 |
| 42 | Steve Oxby             | Additional comments     | Questionnaire completed  I have lived on here [Church Road] for the best part of 30 years.  During the War, prefabs were on this land. I look after all kinds of animals which I live alongside. This is the only home I have ever known. These people help me and feed me.        | Comments noted.   | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
| 43 | Victoria Porter        | Additional comments     | In my view this site [Church Road] does not affect the neighbouring surroundings due to the fact that the site is not visible from the road. As this site at Church Road has and maintains its own private road it has no impact on local highways. This is a very friendly and peaceful site.  | Comments noted.   | Questionnaire   |
| 44 | Porter Glenny          | Q1                      | Questionnaire completed  We do not believe the accommodation needs of the community in Havering have been fully quantified and consider the Needs Assessment should be considerably in excess of the suggested 40 pitches.  | The needs assessment was undertaken in line with best practice guidelines of a household growth rate of 3% per annum (40 pitches up to 2027).   | Email /Letter   |
|    |                        | Q3                      | The site of the property known as Maricot Cottage, Church Road, Noak Hill, Romford and which adjoins an existing authorised site can be made available for such use and is available for purchase by the Council on terms to be agreed.   | The Council is not proposing to buy land for a gypsy and traveller site. However, this site will be assessed by the Council as part of the preparation of the Proposed Submission Document.                   |                 |
|    |                        | Q6 Additional comments  | As stated earlier, further land should be allocated to allow for future projected growth using land adjacent to existing sites to expand.  The Issues and Options Report should make better provision for additional sites throughout the Borough and take up availability of additional land where adjoining existing authorised sites as opposed to planning new locations likely to disrupt adjoining properties and alienate home owners. | The Council will assess additional sites put forward but does not consider that future household growth justifies 'very special circumstances' to designate and allow for additional sites in the Green Belt. |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|------------------------|-------------------------|---|--|-----------------|
| 45 | Michael<br>Pudney      | Q3                      | I am writing to object to the Councils proposal to allocate the [Maylands] site as a designated Travellers site.  | Comments noted.  Please see above (2 and 3). | Email /Letter   |
| 46 | David<br>Shepherd      | Additional comments     | Questionnaire completed  I have been here [Church Road] for about 5 years. My son David is happy and settled here and is settled in a local school. We get on very well with the other families here. We are very happy and contented and would like to be more permanent.  | Comments noted.                              | Questionnaire   |
| 47 | Mrs M.<br>Skinner      | Q3                      | I understand this [Maylands] site is being included by you as a possible permanent traveller site, to which I strongly object. I am concerned as to how you ever reached the proposal as an option. You have disregarded local residents fight to protect the fields from inappropriate development. The fields are within a Site of Metropolitan Importance for Nature Conservation. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. As a resident since 1976 there have been many changes, e.g. A12/M25, local shops closed down, post office etc. This is vital for all local people to keep Maylands Field for the people. | Comments noted.  Please see above (2 and 3). | Email /Letter   |
| 48 | Linda Smith            | Additional comments     | Questionnaire completed  Children in local school. Registered with Doctor. This is a permanent home [Church Road]. Have lived in this for four years. Have electric, water and cess pit. Was granted temporary licence for 5 years.   | Comments noted.                              | Questionnaire   |
| 49 | Stacey Smith           |                         | Questionnaire completed   | Comments noted.                              | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        | Additional comments     | To me and my family this site [Church Road] is in a perfect location. We don't bother anybody and nobody bothers us but we are close to the local shops which I often walk to with my Tommy in his buggy. We have our own sewage system and water and if allowed to stay here it would be good for the Council instead of building a site for us at great cost.  |  |                 |
| 50 | Trina Smith            | Additional comments     | Questionnaire completed  I think that we cause the least amount of harm living here [Church Road]. I feel we have minimum impact on neighbours. Also living in   | Comments noted.                              | Questionnaire   |
|    |                        | Commonic                | caravans I feel we have a smaller carbon footprint than house dwellers which is in keeping with our surroundings. If you look at some other sites there is no green - it is all grey concrete everywhere unlike ours.  |  |                 |
| 51 | K. Stewart             | Q3                      | <ul> <li>There are many reasons why this site [Maylands] should not be considered as a suitable site for travellers, some being as follows:</li> <li>Access to the site is dangerous, as any traffic wishing to enter the site from the M25 roundabout slip-road, has to slow down in front of traffic accelerating to enter the A12 where the speed limit is 70 m.p.h. and any traffic entering the site from the A12, has to cross the slip-road and accidents have happened at this point.</li> <li>There is the very real danger that any future occupants of the site will break into the main field area and use the area for their own purposes, as has happened in the past.</li> <li>The whole area of Maylands Fields was used by local Harold Park residents between 1954 and 2003, without any restrictions, for recreational purposes and they still do not now have any access to the Fields. This was one of the reasons why a Rights of Way claim on the fields was made in 2003 and why an application was made in 2007 for the area</li> </ul> | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response            | Submission type |
|----|------------------------|-------------------------|---|-----------------------------|-----------------|
|    |                        |                         | to be made a Town Green.  |                             |                 |
|    |                        |                         | We are still awaiting a response on the Rights of Way claim and the Town Green application.   |                             |                 |
| 52 | David Stovold          | Q3                      | I am writing to oppose the inclusion of Site MY1 (Maylands Fields) in   | Comments noted.             | Email / Letter  |
|    |                        |                         | the consultation process. There are many reasons why this site is   | 5. (2.12)                   |                 |
|    |                        |                         | entirely inappropriate for a permanent traveller site as was  | Please see above (2 and 3). |                 |
|    |                        |                         | recognised by the Planning Inspector when he gave only a temporary permit to the existing traveller families. It was also recognised by the |                             |                 |
|    |                        |                         | Council when it turned down a planning application submitted by   |                             |                 |
|    |                        |                         | residents on the site and opposed their appeal. The Environment   |                             |                 |
|    |                        |                         | Agency also opposed the appeal. I do not, therefore, feel it necessary  |                             |                 |
|    |                        |                         | to list them all again. I am very concerned, however, that London   |                             |                 |
|    |                        |                         | Borough of Havering appears to have assessed the site in completely   |                             |                 |
|    |                        |                         | the wrong way, including the following assessments:   |                             |                 |
|    |                        |                         | Is the site within or close to an area valued for its heritage? No  |                             |                 |
|    |                        |                         | Is the site within or close to a locally valued area? No  |                             |                 |
|    |                        |                         | It defies belief that the Council can make this assessment knowing  |                             |                 |
|    |                        |                         | that the site borders on Maylands Fields, and knowing:  |                             |                 |
|    |                        |                         | The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI).  |                             |                 |
|    |                        |                         | <ul> <li>The fields are within a Site of Importance for Nature<br/>Conservation (SINC).</li> </ul>  |                             |                 |
|    |                        |                         | Local residents have fought to protect the fields from  |                             |                 |
|    |                        |                         | inappropriate development for nearly a decade.  |                             |                 |
|    |                        |                         | The Council itself valued the fields enough to protect its trees  |                             |                 |
|    |                        |                         | with Tree Protection Orders and to attempt to buy the Fields  |                             |                 |
|    |                        |                         | for the purpose of their protection.  |                             |                 |
|    |                        |                         | Rights of Way on the fields were claimed in January 2003  |                             |                 |
|    |                        |                         | and the Council has taken no action on them.  |                             |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response   | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        |                         | The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.  |  |                 |
|    |                        |                         | You have, therefore, promulgated misinformation about this site and we are concerned that this will affect responses. You should reissue the consultation on this site with the correct assessment or take MY1 out of the consultation, otherwise there must be grounds for an application for the consultation to be set aside. I also ask you to look again at the assessment which claims that the site is not within the high pressure gas pipeline safeguarding zone, as the main gas pipeline, currently being replaced, runs across the front of the site. Work is going on in front of the site at the moment. | National Grid is undertaking ongoing project work in the area but this site and wider area is not within the high pressure gas pipeline safeguarding zone. |                 |
| 53 | Mrs V. Tawse           |                         | Questionnaire completed  | Noted.   | Email / Letter  |
|    |                        | Q1                      | 49 legal pitches and 25 unauthorised pitches = 74 pitches being used. 40 more pitches required = 114 pitches in total in Havering without the 86 already on 32 separate sites.   | A further 14 authorised pitches are required to accommodate gypsies and travellers already living in Havering. As set out in                               |                 |
|    |                        | Q6                      | I believe a figure of 28 pitches would be advisable to bring total of 114 pitches in Havering.   | Option 1A in the Issues and<br>Options Report, the Council<br>considers this the   |                 |
|    |                        | Q7                      | Why are 9 sites within the Green Belt?   | All of the existing authorised and unauthorised sites are on Green Belt land.  |                 |
|    |                        | Q8                      | Where would the Transit Site be and how would it be monitored?   | The Council is not proposing to designate a transit site.  |                 |
|    |                        | Additional comments     | I agree that we have to have allocated sites for Gypsy and Travellers as long as they are kept in reasonable order but not on Green Belt land.   | Green Belt land will only be designated for gypsy and traveller sites in 'very special circumstances'.   |                 |

| ID | Name /<br>Organisation          | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|---------------------------------|-------------------------|---|--|-----------------|
| 54 | Esther Taylor                   | Additional comments     | Questionnaire completed  Me and my three children have lived on here [Church Road] for a number of years. We are settled and happy here with enough space. We are near to local shops, we have our own sewage system and in my opinion we co-exist with the Green Belt surroundings.  | Comments noted.                              | Questionnaire   |
| 55 | Julie and<br>Geoffrey<br>Taylor | Q3                      | We strongly object to the former car wash site, at the corner of Maylands Fields, being a suggested site and there are many reasons for this that were recognised by the Planning Inspector when he only gave a temporary permit to existing traveller families. However, the assessment of the site, by the borough, appears to be completely inaccurate. The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI). The fields are within a Site of Importance for Nature Conservation (SINC). Local residents have fought to protect the fields from inappropriate development for nearly a decade. The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection. Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them. The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this. We feel that the residents' views on Maylands Fields have been totally ignored by the Council a long time and want to stress that Maylands Fields is valued by local residents and is not suitable for a travellers site. | Comments noted.  Please see above (2 and 3). | Email / Letter  |
| 56 | Tom Taylor                      | Additional              | Questionnaire completed  This site is ideal for us as we are all families here [Church Road]. My  | Comments noted.                              | Questionnaire   |
|    |                                 | comments                | concern if the Council built a site would be that they would put all different types of travellers and gypsies together. I keep my horses here along with my other animals. The way of life we lead is along with the environment. We recycle our scrap metals such as the children's old bikes and suchlike. We are quiet people who just want some certainty in our lives and not be pushed around from pillar to   |  |                 |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response  | Submission type |
|----|------------------------|-------------------------|---|---|-----------------|
|    |                        |                         | post.   |   |                 |
| 57 | Tom Taylor             |                         | Questionnaire completed   | Noted. This site will be fully assessed during the next stage                         | Questionnaire   |
|    |                        | Additional comments     | I feel the proposed areas (Church Road - CR13) are necessary for future growth and go along with the families growth so the children          | of the plan production.   |                 |
|    |                        |                         | will have somewhere to live as they get married.  |   |                 |
| 58 | Nigel Teelan           | Q2                      | Willow Tree Lodge, Brookmans Park Drive, Front Lane, Cranham, Upminster, RM14 1LW.  | Noted. This site will be fully assessed during the next stage of the plan production. | Questionnaire   |
|    |                        |                         | Ideal for a [new] site. Excess of 5 acres and readily available. Meets all criteria.  |   |                 |
| 59 | Mr P. Thomas           | Q3                      | The [Maylands] site is totally inappropriate as it is close to an area valued for its heritage and a locally valued area. Also, access to and | Comments noted.   | Email / Letter  |
|    |                        |                         | from the site is considered hazardous as it is on the slip road from the M25. We as local residents have campaigned for 10 years to get       | Please see above (2 and 3).   |                 |
|    |                        |                         | Maylands Fields recognised as an area of Nature Conservation and a Town Green but have been ignored by the Council despite the fact           |   |                 |
|    |                        |                         | the trees have been valued enough by the Council to have a Tree Protection Order placed on them.  |   |                 |
| 60 | Mrs B.<br>Thompson     |                         | Questionnaire completed   | Comments noted.   | Questionnaire   |
|    |                        | Additional              | I cannot imagine the proposed plans would have any impact on  |   |                 |
|    |                        | comments                | surrounding areas and neighbours vehicle access (Church Road).  |   |                 |
| 61 | Peter and              | Q3                      | There are many reasons why this site [Maylands] is entirely   | Comments noted.   | Email / Letter  |
|    | Christine              |                         | inappropriate for a permanent traveller site and this was recognised  |   |                 |
|    | Thompson               |                         | by the Planning Inspector when he only gave a temporary permit to   | Please see above (2 and 3).   |                 |
|    |                        |                         | the existing traveller families within the last few months. However,  |   |                 |
|    |                        |                         | what worries us most is that London Borough of Havering appears to have assessed the site in completely the wrong way by not                  |   |                 |
|    |                        |                         | acknowledging that the site is within or close to an area valued for its  |   |                 |
|    |                        |                         | heritage or that the site is within or close to all area valued area. It is   |   |                 |
|    |                        |                         | incredible that the Council can make this assessment knowing that   |   |                 |
|    |                        |                         | the site borders on Maylands Fields, and knowing that:  |   |                 |

| ID | Name /<br>Organisation                     | Question /<br>Paragraph | Comments  | Council Response   | Submission type |
|----|--|-------------------------|---|--|-----------------|
|    |  |                         | <ul> <li>The fields are within a Site of Metropolitan Importance for Nature Conservation (SMI);</li> <li>The fields are within a Site of Importance for Nature Conservation (SINC);</li> <li>Local residents have fought to protect the fields from inappropriate development for nearly a decade;</li> <li>The Council itself valued the fields enough to protect its trees with Tree Protection Orders and to attempt to buy them for the purpose of their protection;</li> <li>Rights of Way on the fields were claimed in January 2003 and the Council has taken no action on them;</li> <li>The fields were claimed as a Town Green in November 2007 and the Council has taken no action on this.</li> <li>In light of all of this it would be totally the wrong decision to put a travellers site on this location and hope that reason and common sense prevail when the consultation is undertaken and another, more suitable site, is chosen.</li> </ul> |  |                 |
| 62 | Brian Todd                                 | Q3                      | I am a resident living close to Maylands Fields and am totally opposed to the proposal of a permanent travellers site to be located there.  | Comments noted.  Please see above (2 and 3).                             | Email / Letter  |
| 63 | Tower<br>Hamlets<br>Council                | General                 | The London Borough of Tower Hamlets would like to take this opportunity to highlight the newly published London Plan (2011) policy 3.8 Housing Choice which suggests boroughs can work with neighbouring boroughs to deliver any identified need.   | Noted. All neighbouring boroughs have been included in the consultation. | Email / Letter  |
| 64 | Councillor<br>Linda van den<br>Hende (LBH) | Q1                      | Questionnaire completed  The Needs Assessment is based on actual occupation rather than an analytical approach. The Fordham report in 2008 appeared to indicate that in Havering there was no unmet need. The Fordham study should be referred to.  | Comments noted.  | Questionnaire   |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments   | Council Response                             | Submission type |
|----|------------------------|-------------------------|--|--|-----------------|
|    |                        | Q2                      | No new sites should be in the Green Belt.  |  |                 |
|    |                        | Q3                      | No specific comments other than Green Belt sites should not be considered.   |  |                 |
|    |                        | Q4                      | Green Belt is the major consideration. Other factors such as appearance and effect on surroundings are equally important.  |  |                 |
|    |                        | Q5                      | In addition active and meaningful consultation with residents directly affected must be undertaken before decisions are taken.   |  |                 |
|    |                        | Q6                      | According to the original proposals in the Mayor of London's Plan, only 42 pitches were originally envisaged. Therefore the proposed total of 74 pitches far exceeds this figure and there should be no further increase above the 74 existing pitches.  |  |                 |
|    |                        | Q7                      | No new sites.  |  |                 |
|    |                        | Q8                      | No transit site. There is always the risk of permanence  |  |                 |
|    |                        | Additional comments     | As the London Mayor has decided not to set a target for pitch numbers, and given Havering's proposal is well above his original number, the total of 74 pitches on existing sites sets the right balance. The Fordham Research Groups analysis which takes account to growth to 2017 appears to support no need for growth in Havering. Given current occupation appears to cause little or no local difficulties, the pragmatic view should be to consider what we have with no further increase. The Green Belt must be protected. |  |                 |
| 65 | John Walsh             | Q3                      | As a close resident of Maylands Fields I am extremely concerned that the Officers/Councillors of the London Borough of Havering appear to have totally overlooked the importance of this area as a site of nature conservation within the borough, and have disregarded the views of the local community about Maylands fields over the last few years,  | Comments noted.  Please see above (2 and 3). | Email / Letter  |

| ID | Name /<br>Organisation | Question /<br>Paragraph | Comments  | Council Response                             | Submission type |
|----|------------------------|-------------------------|---|--|-----------------|
|    |                        |                         | i.e.; the Town Green Scheme for one. I understand that sites need to be found for the travelling community, but am extremely concerned that by making this an official site it could result in the long term to an overspill situation into Maylands Fields so destroying them in the process, and leading to a situation similar to that at 'Crays Hill' which the authority there is having to spend vast sums of money to resolve.  For many years there used to be quite a large permanent traveller site in Dennises Lane at the rear of Stubbers outdoor pursuits centre which unfortunately became run down and eventually closed. Could this site not be reinstated for use again? The residents of Harold Wood/Park have had to put up with a lot in recent times regarding planning and building in this area and many of their concerns have been overlooked by Havering Council. I hope that on this occasion that we are listened to, and our views respected as part of the |  |                 |
|    |                        |                         | community that already reside in Havering and have done so for many, many years.  |  |                 |
| 66 | Lyn Watts              | Q3                      | The site [Maylands] is totally unsuitable for any development due to its situation on the slip road from the M25. I was under the impression that dangerous access to and from this site was the main reason the original petrol garage was closed. Also it would make easy access onto Maylands Field which has been designated as a Site of Metropolitan Importance for Nature Conservation. The fields are within a Site of Importance for Nature Conservation. Local residents have fought to protect the field from all sorts of unsuitable development for nearly ten years. I was under the impression that there are Tree Protection Orders on the field and that the council tried to buy the field to protect it from misuse. Rights of Way on the fields were claimed in 2003 - no action taken - or on residents' wish to make the area a Town Green in 2007. The local residents, of which I have been one, for nearly 40 years, seem to be completely ignored.              | Comments noted.  Please see above (2 and 3). | Email / Letter  |



# **Gypsy and Traveller Sites Development Plan Document**

**Proposed Submission Document** 

[DATE] 2012

Head of Regeneration, Policy and Planning London Borough of Havering Town Hall Main Road Romford RM1 3BD

[DATE] 2012

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# 1 Introduction

- 1.1 Havering's Local Development Framework (LDF) consists of a suite of planning documents that collectively guide the future planning of the borough over the long term. The LDF is led by the Core Strategy and Development Control Policies DPD, adopted in 2008, which sets out Havering's vision and objectives for the planning of the borough up to 2020, as well as detailed development control policies that apply across the whole of the borough.
- 1.2 The Council has a responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. The 2004 Housing Act requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area, as part of the wider assessment of housing needs, and produce a strategy on how these needs can be met.
- 1.3 In response to this requirement, the council is preparing a Gypsy and Traveller Sites Development Plan Document (DPD) that details how the Council will make provision for sufficient additional pitches for Gypsies and Travellers. This Proposed Submission Document sets out the Council's policy approach and list of sites for Gypsy and Traveller accommodation in the Borough.
- 1.4 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF, with the purpose of implementing the provision within Core Policy CP2 Sustainable Communities to meet the accommodation needs of the Gypsy and Traveller community in Havering, within the overall framework of the Core Strategy which includes protection of the Green Belt.

#### **Programme for Production**

- 1.5 The DPD preparation process is governed by the Planning and Compulsory Purchase Act 2004 (as amended), and typically takes two years from evidence gathering to adoption. The overall process for the preparation of the Gypsy and Traveller Sites DPD has been split into four stages:
  - Call for Sites (July to October 2010)
  - Issues and Options Document (June to August 2011, as required by Regulation 25)
  - Proposed Submission Document (current stage, as required by Regulation 27)
  - Adopted Plan (DATE 2012)

#### Consultation

1.6 Through the Call for Sites process, the Council was able to undertake early consultation with key stakeholders prior to any plan documents being prepared, to ensure the views of those involved were taken into account. The Call for Sites encouraged landowners and other parties to put forward potential sites that may be available for use by the Gypsy and Traveller community, including unauthorised sites being used by Gypsies and Travellers without planning permission, or a site in another use that may be suitable for future authorised use by Gypsies and Travellers. All of the sites put forward for consideration have been assessed against the same criteria.

- 1.7 The publication of the Issues and Options Report comprised the second stage of the process and had three main components: the assessment of need for Gypsy and Traveller sites in Havering; the identification of the range of issues to be considered in identifying suitable locations for permanent Gypsy and Traveller sites, and the options for allocating sites which the public are being consulted. Interested parties were also invited to put forward sites within the consultation period for the Issues and Options Report.
- 1.8 The report considered the sites that had been put forward during the call for sites together or were existing tolerated sites or sites with temporary permission that were being considered for their suitability. The Council received 66 comments to the Issues and Options consultation and a report on consultation has been published that outlines how comments received have been taken into consideration. Two new sites were put forward for consideration during the Issues and Options consultation and have been assessed in the preparation of this Proposed Submission Document.

#### **Site Assessment**

- 1.9 In allocating sufficient sites to accommodate Gypsies and Travellers in Havering, the Council considers that land allocated within this DPD must be acceptable in sustainability terms, satisfactory to the settled and travelling community and capable of being delivered within the plan period. The Council has used a robust process for the assessment of potential sites that have allowed for a comparison of the relative merits of each site so that an informed decision can be made on the most appropriate sites to be allocated in the DPD.
- 1.10 The site assessment methodology used takes a sequential approach to determining if an area of land is suitable to be allocated as a Gypsy and Traveller site. Details of the site assessment methodology are set out in section 4 of the DPD. The full site assessment to inform allocation of the sites put forward for permanent permission is available as a Technical Report / supporting report to this DPD.

#### **Sustainability Appraisal**

- 1.11 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the plan-making process. Section 19(5) of the Planning and Compulsory Purchase Act 2004 requires DPDs to undergo SA as part of the process of ensuring that they will contribute to sustainable development. It is a key tool used to appraise the environmental, economic and social effects of plans, strategies and policies, and the results of the SA contribute to the reasoned justification of policies.
- 1.12 The SA process occurs in parallel with the production of the DPD; this integration is fundamental to sound plan making. It is a systematic and iterative process, and when carried out as recommended by government guidance fully incorporates the requirements of the EU SEA Directive. As with the DPD process, the SA process includes both ongoing engagement with stakeholders and statutory consultation periods.
- 1.13 A full Sustainability Appraisal has been undertaken for this report and is available on the Council's website.

# **Appropriate Assessment**

- 1.14 European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the Habitats Directive) requires Appropriate Assessments of plans to assess whether they are likely to have an adverse impact on the integrity of internationally important sites designated under the Directive. European sites comprise of Special Areas of Conservation (SACs) and Special Protection Areas for birds (SPAs), collectively these are known as the Natura 2000 network.
- 1.15 An Appropriate Assessment of this Gypsy and Traveller Sites DPD has been carried out and has found that it is unlikely that there will be any adverse impacts on the Natura 2000 network arising from the proposals set out within the plan.

#### How to respond

1.16 The consultation on the Gypsy and Traveller Sites DPD Proposed Submission Document runs for six weeks from [DATE] 2012 to [DATE] 2012. Copies of the Proposed Submission Document, response form and supporting documents are available on the Havering website at: <a href="https://www.havering.gov.uk">www.havering.gov.uk</a> alternatively, you can request a copy from: <a href="https://www.havering.gov.uk">LDF@havering.gov.uk</a> or a printed copy from:

Development and Transport Planning London Borough of Havering Town Hall Main Road Romford RM1 3BD

- 1.17 Responses may be sent by email to <a href="mailto:LDF@havering.gov.uk">LDF@havering.gov.uk</a> or by post to the above address.
- 1.18 Please note that comments made on the Proposed Submission Document cannot be treated as confidential and will be made available for public inspection.
- 1.19 All representations received will be carefully considered prior to submission of the Gypsy and Traveller Sites DPD to the Secretary of State. Following submission, the soundness of the Gypsy and Traveller Sites DPD will be tested at an Independent Examination. All parties who made representations on the Proposed Submission Document will be notified of the time and place of the examination and how they may be involved.

# 2 Policy Context

2.1 This Proposed Submission Document takes account of current and emerging national and regional planning policy and guidance on provision for Gypsy and Traveller sites in England, and is therefore consistent with national planning policy and in general conformity with the London Plan.

#### **National Policy**

- 2.2 The Government's key objective for planning for housing is to ensure that everyone has the opportunity of living in a decent home, with the associated rights and responsibilities the same for all citizens. PPS3 Housing defines housing need as "the quantity of housing required for households who are unable to access suitable housing without financial assistance". This definition of need applies to Gypsies and Travellers, but in determining need account must be taken of the differing context in which this need arises.
- 2.3 National policy relating to accommodation for the Gypsy and Traveller Community is laid out in Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites. Provision for Travelling Show People is covered by CLG Circular 04/2007: Planning for Travelling Show People.
- 2.4 Circular 01/2006 seeks to create and support sustainable, respectful and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision. The Circular sets states that local authorities should allocate sufficient sites for Gypsies and Travellers within DPDs, and identifies a set of criteria that should be considered when allocating sites:
  - Site suitability
  - Impact on areas or features designated for their national landscape or conservation importance
  - Sustainability of the location
  - Impact on nearest settlement (including character and appearance of the locality; local amenity; and social and physical infrastructure)
  - Meeting the needs of Gypsies and Travellers
  - Site availability
- 2.5 In July 2010, the Coalition Government announced its intention to replace Circulars 01/2006 and 04/2007 with new light-touch guidance as part of a wider package of reforms in the planning system. In parallel, the Government plans to introduce stronger planning enforcement powers, including limiting the opportunities for retrospective planning applications, and will encourage local authorities to provide an appropriate number of traveller sites that reflect local and historic demand.
- 2.6 In April 2011 the Government published a draft new planning policy statement for traveller sites for consultation. This follows the commitment made by the Secretary of State to withdraw the planning circulars for traveller sites and replace them with a new, short, light-touch single policy.
- 2.7 The draft statement enables local authorities to make their own assessment of need and set their own local targets to address the likely permanent and transit accommodation needs of travellers in light of historical demand. In

preparing development plans the local authority should: identify specific sites for a 15 year period, protect the Green Belt from development, seek to reduce tensions between settled and traveller communities and protect amenity and the environment.

2.8 Consultation on the draft Planning Policy Statement for Traveller Sites closed in August 2011. It is intended that the final policy will be incorporated into the NPPF which currently does not cover provision of accommodation for Gypsy and Travellers. Until such time, Circulars 01/2006 and 04/2007 remain in force, although they carry comparatively less weight as a consideration in planning decisions as they have been selected for review.

#### **The London Plan**

- 2.9 Policy 3.8 of the London Plan 2011 recognises that Londeners should have a genuine choice of homes that they can afford and which meet their requirements for difference sizes and types of dwellings. Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that the accommodation requirements of Gypsies and Travellers (including travelling show people) are identified and addressed in line with national policy.
- 2.10 The Mayor does not consider it appropriate to include detailed policies for the provision of sites for Gypsies and Travellers and Travelling Show People in the London Plan because of the level of locally-specific detail involved and the scale of the issue. Local authorities are responsible for determining the right level of site provision in their areas in consultation with local communities and setting targets for provision based on robust evidence of local need. The Mayor believes that the boroughs are best placed to assess the needs and make provision for these groups through new pitch provision, protection or enhancement of existing pitches, or by other means.

#### **Havering's Core Strategy and Development Control Policies DPD**

2.11 The strategy for meeting the accommodation needs of Gypsies and Travellers in Havering is set in the Core Strategy and Development Control Policies DPD, adopted in 2008. Core Policy CP2 (Sustainable Communities) states that sustainable, attractive, mixed and balanced communities will be created by, among other things, identifying sites to meet the identified needs of Gypsies and Travellers in a Gypsy and Travellers DPD.

## **CP2 - SUSTAINABLE COMMUNITIES**

Sustainable, attractive, mixed and balanced communities will be created by:

- ensuring that the sizes, types and tenures of new housing meet the need of new and existing households at local and sub-regional level
- ensuring that the required sizes and types of new housing are of a density and design that is related to a site's access to current and future public transport and are compatible with the prevailing character of the surrounding area
- ensuring that, in total, borough-wide 50% of all homes from new residential planning permissions are affordable; of which 70% social rented for those on low incomes and 30% for those on intermediate

incomes

- safeguarding the existing stock of large homes in Emerson Park and Hall
- ensuring that the needs of those households with special needs, including the elderly, are met
- ensuring that in their design and layout new homes provide for the lifetime needs of households
- securing the social, economic and environmental regeneration of priority housing areas
- ensuring that all development demonstrates that it supports improved health and well being
- identifying sites to meet the identified needs of gypsies and travellers in a Gypsy and Travellers DPD
- 2.12 Development Control Policy DC8 (Gypsies and Travellers) sets out the criteria under which planning permission will be granted for Gypsy and Traveller sites. In determining planning applications, the definition of Gypsies and Travellers as per Circular 01/2006 is used. DC8 states that sites within the Green Belt will only be acceptable in exceptional circumstances.

#### DC8 - GYPSIES AND TRAVELLERS

Planning permission will only be granted for gypsy/traveller sites provided all the following criteria are satisfied:

- The proposal meets identified need with regard to the traveller needs assessment/local housing needs assessment
- It is suitable for mixed residential and business uses and has no adverse impact on the safety and amenity of the occupants and their children and neighbouring residents
- It has safe and convenient access to the road network and would not cause a significant hazard to other road users
- It is located within reasonable distance of services and community facilities in particular schools and essential health services
- It has provision for parking, turning, service and emergency vehicles and servicing of vehicles
- It is capable of accommodating the number of caravans/mobile homes proposed with any equipment for business activities
- The site will be supplied with essential services such as water, power, sewerage and drainage, and waste disposal.

Sites within the Green Belt will only be acceptable in exceptional circumstances and where through their design, layout and landscaping they minimise its impact on the openness of the Green Belt, do not prejudice the purposes of including land in the Green Belt, do not prejudice the recreational usage of the Green Belt or involve the loss of high grade agricultural land.

# 3. Spatial Issues and DPD Objectives

3.1 The overall vision for planning for housing within Havering is provided within the Core Strategy:

Outside the town centres the borough's suburban character will be maintained and enhanced by sympathetic residential development which respects and makes a positive contribution to the existing context. All groups within the community will have good, affordable access to the housing they need, including those needing larger, family-sized accommodation.

3.2 To deliver this vision, the Core Strategy sets out Objective LV(A) for Places to Live:

Make Havering a place where people will want to live and where local people are able to stay and prosper, by ensuring that local and sub-regional housing need is address whilst maintaining and enhancing the character of Havering's residential environment which makes the borough such an attractive place to live.

- 3.3 Within the Core Strategy, policy CP1 (Housing Supply) stipulates that, outside town centres and the Green Belt, all non-designated land is prioritised for housing. As can be seen from the visual summary of the Core Strategy (Figure 1), over 50 percent of the borough falls within the Green Belt, and large areas of land within the built up area of the borough are designated for specific uses, such as public open space or employment.
- 3.4 As elsewhere in London, the Council must balance these competing land uses within the constraint of an urban area which is already densely developed. In general, land within the urban area which is suitable for residential development attracts a premium price.
- 3.5 The adopted Core Strategy and Development Control Policies provide the general criteria against which planning applications are assessed. The role of the Gypsy and Traveller Sites DPD in delivering the strategic objective is therefore the identification of preferred locations for provision of sufficient permanent residential Gypsy and Traveller sites to meet the locally identified need for pitches.
- 3.6 The main spatial issues to be addressed by the DPD therefore include:
  - The requirement set out in the 2004 Housing Act and Circular 01/2006 for local authorities to assess and produce a strategy to meet the identified needs of Gypsies and Travellers permanently resident in the local area, including specific site allocations to meet the identified pitch requirement in a DPD.
  - The distribution of sites throughout the borough to support the creation of mixed and balanced communities while protecting the open countryside and natural environment.
  - The policy and other constraints on land use within the borough, specifically that over 50 percent of the borough is within the Green Belt and the urban area is well developed.

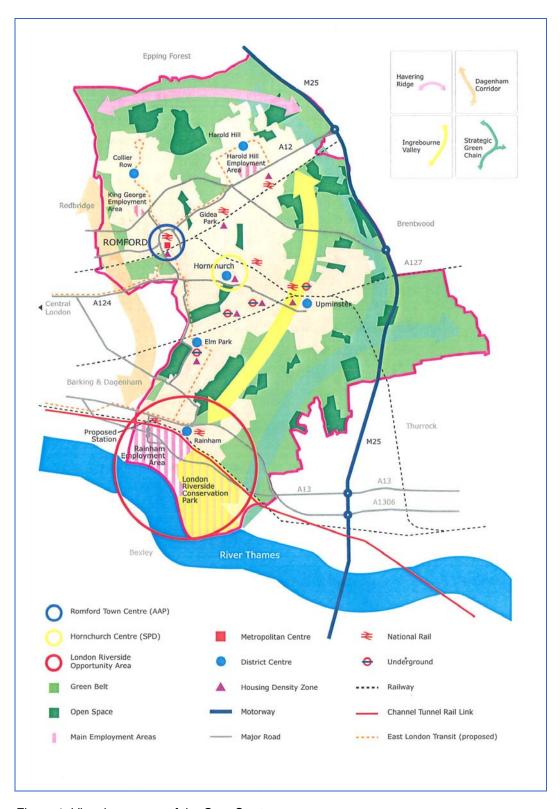


Figure 1: Visual summary of the Core Strategy

- 3.7 Based on the issues identified, specific objectives for the Gypsy and Traveller Sites DPD have been set, linked to the overall vision and objective of the Core Strategy, to ensure that the DPD contributes to the implementation of the Core Strategy. The broad objectives for the DPD are:
  - To support the removal of unauthorised development in the borough, and strengthen the Council's ability to take enforcement action against unauthorised sites.
  - To allocate sufficient suitable sites to meet the needs of Gypsies and Travellers living in Havering, as determined by the 2010 Havering Needs Assessment.
  - To protect the Green Belt from inappropriate development, except in very special circumstances.
  - To set out a clear delivery strategy for the allocated sites that identifies how much development will happen, where, when and by whom it will be delivered
  - To provide specific criteria about the form of development which will be allowed on each site to ensure the land use is appropriate within the constraints of the local area.

# 4. Requirement for Gypsy and Traveller pitches

## **Gypsy and Traveller Accommodation Assessments**

- 4.1 Gypsy and Traveller Accommodation Assessments (GTAA) identify and quantify the accommodation needs of the Gypsy and Traveller community in the same manner as Strategic Housing Market Assessments do for the general population. A separate assessment is required because of the relatively small size of the Gypsy and Traveller population compared to other groups, the difficulties in accessing information about the community, and the particular lifestyle and culture of Gypsies and Travellers which gives rise to distinct accommodation needs.
- 4.2 In order to identify suitable locations for Gypsy and Traveller sites in Havering, a call for sites was undertaken as the first part of the production of the Gypsy and Traveller Sites DPD. The call for sites process was also used to update the findings of Havering's 2004 Needs Assessment. A refresh of the 2004 study was considered sufficient (appropriate) as the original study was carried out in line with best practice guidelines for GTAA.

#### **Definition of a Pitch / Site**

- 4.3 A pitch is defined as accommodating a household, and in Havering generally includes a large static trailer, touring caravan, amenity building and parking and turning space. A pitch can therefore accommodate several caravans belonging to an individual family; the number of caravans on a pitch is comparable to the number of bedrooms in a house.
- 4.4 A site can be made up of or more pitches. Site sizes proposed in the DPD range between one and 12 pitches. Sites have been identified based no land ownership, therefore pitches located in the same geographical area may be delineated into several sites despite forming a cohesive area of development.

# Havering Gypsy and Traveller Needs Assessment: 2010 Update / Numbers of Pitches

4.5 The needs assessment showed that there were 74 pitches in Havering at the time of the Call for Sites. 12 of these had permanent permission. Of the other 62, 37 pitches had temporary permission, 11 had previously had or have since been granted temporary permission and 14 were unauthorised (see Table 1 below).

Table 1: Pitches with current / previous temporary permission, and unauthorised pitches (2010)

| Site   | Pitches with<br>temporary<br>permission | Pitches with previous temporary permission or have since been granted temporary permission | Unauthorised pitches |
|--|---|--|----------------------|
| Church Road (CR7-CR10)                               | 4                                       | 0  | 0                    |
| Benskins Lane (BL1-BL6)                              | 12                                      | 0  | 0                    |
| Hogbar Farm (LB2)                                    | 8                                       | 0  | 0                    |
| Fairhill Rise (LB3)                                  | 3                                       | 0  | 0                    |
| Tyas Stud Farm (UP1)                                 | 1                                       | 0  | 0                    |
| Laburnham Stables (UP2)                              | 3                                       | 0  | 0                    |
| Ashlea View (UP3)                                    | 3                                       | 0  | 0                    |
| Clemlev, Willoughby Drive (WD3)                      | 1                                       | 0  | 0                    |
| Willoughby Drive (WD4)                               | 1                                       | 0  | 0                    |
| Prospect Road (HC1)                                  | 1                                       | 0  | 0                    |
| Hogbar Farm West (LB1)                               | 0                                       | 3  | 0                    |
| Vinegar Hill (LB4)                                   | 0                                       | 6  | 4                    |
| Maylands (former Brook Street service station) (MY1) | 0                                       | 2  | 0                    |
| Church Road (CR5, CR6, CR11, CR12)                   | 0                                       | 0  | 8                    |
| Land between 66-72 Lower Bedfords Road (LB5)         | 0                                       | 0  | 1                    |
| Willoughby Drive (WD1)                               | 0                                       | 0  | 1                    |
| TOTAL  | 37                                      | 11   | 14                   |

- 4.6 The needs assessment also projected a growth of a further 40 households though family formation by 2027, the end of the plan period.
- 4.7 The analysis of planning and environmental constraints showed that the Green Belt is the biggest obstacle to identifying suitable land for Gypsy and Traveller pitches in Havering. Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, the Council has not been able to identify any suitable land within the built-up area and no such sites have been put forward during the preparation of the DPD.
- 4.8 When choosing how many pitches to allocate in this DPD, the Council has had to decide whether the unmet need for Gypsy and Traveller accommodation is strong enough to justify allocating land in the Green Belt.
- 4.9 Based on this, the Issues and Options Report set out three policy options for the number of pitches to be allocated in the Gypsy and Traveller Sites DPD.
  - Option 1A To allocate land for a further 14 authorised pitches so that there are enough for the gypsies and travellers already living in Havering.
  - Option 1B To allocate land for a further 34 authorised pitches so that there are enough for the gypsies and travellers already living in Havering and half of the future projected growth up to 2027.

- Option 1C To allocate land for a further 54 authorised pitches so that there are enough for the gypsies and travellers already living in Havering and all of the future projected growth up to 2027.
- 4.10 The report made clear that the Council's preferred option was for 14 additional authorised pitches so that all the existing families could be accommodated. The report made clear however that not all the pitches with temporary permission or expired temporary permission would necessarily be made permanent and would be assessed during the preparation of the DPD.
- 4.11 The Council gave careful consideration to the representations that supported Options 1B and 1C. However, the Council remains of the view that Option 1A to provide for 14 additional authorised pitches strikes the right balance between meeting the priority housing needs of gypsies and travellers by permitting a sufficient number of pitches to accommodate all the households living in Havering at the time of the needs survey and only allocating Green Belt land where this is justified by 'very special circumstances'.

#### **Site Assessment**

- 4.11 In allocating sufficient sites to meet the needs of the Gypsy and Traveller community in Havering, the Council considers that land allocated within this DPD must be acceptable in sustainability terms, satisfactory to both the settled and travelling community, and capable of being delivered within the plan period.
- 4.12 The site assessment methodology put forward in the Issues and Options Report proposed a sequential approach to determine if an area of land is suitable and available to be allocated as a Gypsy and Traveller site. This three tier approach has been used to assess all of the sites put forward for consideration to provide permanent Gypsy and Traveller pitches.
- 4.13 The first level of assessment determined the land use considerations applicable to each site, as set by national and local planning policies. The first level also investigates any environmental constraints that would make the site unsuitable for residential use. This stage is a high level process to determine if there are fundamental planning constraints on the site that make it inappropriate as a matter of principle.
- 4.14 The second level of assessment establishes that the required physical and social infrastructure required to support use as a Gypsy and Traveller site is available, or capable of being provided. The location of sites in relation to existing settlements is considered here, as is the capacity of existing service provision to ensure no detrimental impact would occur from the additional demand resulting from a site.
- 4.15 The third level of assessment relates to site-specific design considerations, to ensure that the character of the local area, the amenity of surrounding residents and the health and wellbeing of site residents is assured, and that proposed sites are deliverable within the 15 year timeframe of the DPD.
- 4.16 This sequential approach has allowed unsuitable sites to be filtered out early in the process. Sites must satisfy assessment at each level to pass on to the next level. Only sites which pass all three levels have been put forward by the

Council as a proposed site allocation. A full report on the site assessments has been published as a Technical Report to this Proposed Submission DPD. Details of the sites the Council proposes to allocate for permanent permission and the number of pitches to be allowed on each is set out in section 5 of this report.

### 5. Site Allocations

- 5.1 The Council has identified sites to accommodate a total of 62 pitches to meet the need for Gypsy and Traveller pitches in Havering. 45 of the pitches identified either have temporary, or expired temporary, planning permission. Two pitches with temporary permission at Maylands (the former Brook Street service station) and a single pitch with temporary permission at Prospect Road were not considered suitable for permanent permission. Sites to accommodate 17 further pitches have also been identified 14 to achieve the Councils preferred option for the number of pitches and three to compensate for not making the Maylands and Prospect Road sites permanent.
- 5.2 The sites identified below and shown on the maps in Appendix 1 of this report have been allocated for the provision of Gypsy and Traveller pitches. Each site allocation includes the number of pitches allowed, how the site is to be developed and what mitigation or other measures are required to make its use as a Gypsy and Traveller site acceptable.

Note: Key issues for each site allocation

- · Applications in line with adopted policies
- Highways access
- Residential amenity
- · Site layout and landscaping
- Drainage
- No business uses allowed on any of the sites (all in Green Belt)
- 5.3 The majority of the identified need in Havering is immediate and the Council will encourage site residents on allocated sites to bring forward applications as soon as possible following adoption of the DPD (to help address this shortfall). All of the sites identified in the DPD are privately owned and it will be up to individuals to submit planning applications. All applications will be assessed against their conformity with the Core Strategy and Development Control Policies DPD specifically Development Control Policy DC8 as well as any applicable site specific criteria identified in this DPD.
- 5.4 Detailed information about site design is set out in the DCLG guidance document *Designing Gypsy and Traveller Sites: Good Practice Guide* (2008) and applicants are encouraged to consider this in any applications made.
- The correct phasing of provision should remove the presence of unauthorised sites and in those areas where site residents do not submit applications the Council will consider enforcement action where expedient.
- Due to the very special circumstances to allowing development in the Green Belt, proposals for additional gypsy and traveller sites beyond those set out in this DPD would not be granted planning permission in the Green Belt.
- 5.7 Similarly, it is likely that increases in the number of pitches would have an impact on the openness of the Green Belt on existing sites and would not be granted planning permission. However, in very exceptional circumstances, where it can be clearly shown through evidence and detailed layout and

landscaping proposals that there is a genuine need through family growth of existing residents from that pitch [and not relatives of] and that the openness of the Green Belt and amenity of the site would not be adversely affected, would proposals be considered.

# **Proposed sites / pitches**

| Site   | Pitches |          |
|--|---------|----------|
| Church Road (CR6)                            | 1       |          |
| Church Road (CR7)                            | 1       |          |
| Church Road (CR8)                            | 1       | • 6      |
| Church Road (CR9)                            | 1       |          |
| Church Road (CR10)                           | 1       |          |
| Church Road (CR11)                           | 1       |          |
| Mariecot Bungalow, Church Road (CR14)        | 6       |          |
| Benskins Lane (BL1)                          | 2       |          |
| Benskins Lane (BL2)                          | _2      | <b>y</b> |
| Benskins Lane (BL3)                          | 2       |          |
| Benskins Lane (BL4)                          | 2       |          |
| Benskins Lane (BL5)                          | 2       |          |
| Benskins Lane (BL6)                          | 2       |          |
| Hogbar Farm West (LB1)                       | 3       |          |
| Hogbar Farm (LB2)                            | 8       |          |
| Fairhill Rise (LB3)                          | 3       |          |
| Vinegar Hill (LB4)                           | 13      |          |
| Land between 66-72 Lower Bedfords Road (LB5) | 1       |          |
| Tyas Stud Farm (UP1)                         | 1       |          |
| Laburnham Stables (UP2)                      | 3       |          |
| Ashlea View (UP3)                            | 3       |          |
| Willoughby Drive (WD1)                       | 1       |          |
| Clemlev, Willoughby Drive (WD3)              | 1       |          |
| Willoughby Drive (WD4), 1                    | 1       |          |

Policy GTS1: Provision of Permanent Gypsy and Traveller Pitches

The Council will make provision for 62 pitches to meet identified Gypsy and Traveller needs in Havering.

OR

The Council will make provision for 17 pitches to meet identified Gypsy and Traveller needs in Havering. In addition, the Council will make provision for 45 [existing] pitches which have, or have previously had, temporary planning permission

All planning applications for Gypsy and Traveller sites will be considered against Policy DC8 and other relevant policies in Havering's Core Strategy and Development Control Policies DPD.

Business uses will not be allowed on Green Belt sites [they are all GB sites]

Site specific criteria are set out in the individual site allocations / policies in this DPD.

#### Church Road (CR7-CR10)

These sites are situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road. The sites form a compact, well contained grouping adjacent to Mariecot Bungalow to the north and all have temporary permission for 1 pitch. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are a number of unauthorised pitches and buildings and open land.

Each of the following sites is allocated for 1 pitch: CR7, CR8, CR9 and CR10.

The four sites are privately owned and occupied and will be privately managed by the current owners.

Policy GTSXX: Church Road

Church Road sites (CR7-CR10) are each allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of / Details of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

[Level of detail for each site to be considered especially boundaries and landscaping]

# Church Road (CR6 and CR11)

These sites are situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road. These sites are currently unauthorised with 1 pitch on each. The sites are adjacent a group of sites with temporary permission comprising a total four pitches, with Mariecot Bungalow situated to the north. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are two further sites with number of unauthorised pitches and buildings and open land.

The following sites are allocated for 1 pitch: CR6 and CR11.

# Policy GTSXX: Church Road

Church Road sites (CR6 and CR11) are each allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Mariecot Bungalow, Church Road (CR14)

This site was put forward at the Issues and Options stage and is currently in residential use, comprising a bungalow and garden. The site is situated off Church Road, in Noak Hill. Access is via an unmade road which runs northwards from Church Road.

The property is adjacent to a group of pitches form a compact, well contained site/grouping adjacent to Mariecot Bungalow to the north and all have temporary permission for 1 pitch. A large single storey building, Crown Farm Kennels, is situated to the west of the site. To the east is open land towards Benskins Lane off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. To the south of the sites towards Church Road are a number of unauthorised pitches and buildings and open land.

This site (CR14) is allocated for 6 pitches.

Development of this site will be dependent on the sale of this land.

Policy GTSXX: Mariecot Bungalow, Church Road

Mariecot Bungalow, Church Road (CR14) is allocated for 6 pitches. Proposals for development will be required to provide the following:

- Suitable site design:
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

## **Benskins Lane (BL1-BL6)**

The six sites on Benskins Lane each have temporary permission for 2 pitches. Benskins Lane is a roughly surfaced road off which there is sporadic development including residential properties, stables, kennels caravans and a number of business uses. The sites lie at the northern end of Benskins Lane and are bordered on the northern side by the embankment of the M25 motorway. An area of established dense woodland lies to the west of the sites and alongside the motorway embankment. The sites previously comprised part of this woodland which was cleared to facilitate development of the sites.

Each of the following sites is allocated for 2 pitches: BL1, BL2, BL3, BL4, BL5 and BL6.

The six sites are privately owned and occupied and will be privately managed by the current owners.

## Policy GTSXX: Benskins Lane

Benskins Lane sites (BL1-BL6) are each allocated for 2 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Contributions towards the restoration of woodland in adjacent areas
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### **Hogbar Farm West (LB1)**

The site is at the western end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has previously had temporary permission for 3 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB1) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Hogbar Farm West

Hogbar Farm West (LB1) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

## **Hogbar Farm (LB2)**

The site is one of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has temporary permission for 8 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB2) is allocated for 8 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Hogbar Farm

Hogbar Farm (LB2) is allocated for 8 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Fairhill Rise (LB3)

The site is one of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has temporary permission for 3 pitches.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB3) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Fairhill Rise

Fairhill Rise (LB3) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design:
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

## Vinegar Hill (LB4)

The site is at the eastern end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road, and within the Metropolitan Green Belt. The site has previously had temporary permission for 6 pitches but currently has 12 pitches on site.

To the south-west of the site lies open countryside. To the east on the opposite side of Straight Road is the former Whitworth Centre site which has been designated for residential development. North of the site on the opposite side of Lower Bedfords Road is a large mobile home park known as Sunset Drive. West of this is open countryside. To the south of the site is a residential cul-de-sac called Stanwyck Gardens.

This site (LB4) is allocated for 13 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Vinegar Hill

Vinegar Hill (LB4) is allocated for 13 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Land between 66-72 Lower Bedfords Road (LB5)

The site is located on the southern side of Lower Bedfords Road between Risebridge Close to the west and Chase Cross to the east. Along this side of Lower Bedfords Road within the Green Belt there is a ribbon of development consisting mostly of bungalows with some gaps in the continuity of the frontage. On the north side of Lower Bedfords Road is open countryside leading Bedfords Park. This is currently an unauthorised site with 1 pitch.

This site (LB5) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

# Policy GTSXX: Land between 66-72 Lower Bedfords Road

The land between 66 and 72 Lower Bedfords Road (LB5) is allocated for 1 pitch. The Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Tyas Stud Farm (UP1)

The site lies to the east of Upminster and within the Metropolitan Green Belt. It is set back some distance from St Mary's Lane behind Latchford Farm and is accessed along an unmade track. An elevated section of the M25 motorway runs along the western boundary while the London Fenchurch Street to Southend railway line passes to the north.

This site has temporary permission for one pitch and for a stable block. The farm is a rectangular parcel of land. The site for the caravans and the stables is located at the southern end. The remainder of the land is given over to paddocks.

This site (UP1) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Tyas Stud Farm

Tyas Stud Farm (UP1) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Apart from the applicant's breeding and rearing of horses no trade or business may be carried out on the site and no materials associated with such uses shall be stored on the site.
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Laburnham Stables (UP2)

The site is within the Metropolitan Green Belt and is part of a corridor of open land that lies between the built up area of Cranham to the west and the M25 motorway to the east. The site lies at the eastern end of Laburnham Gardens from which access is gained. Within the site is a stable block, with planning permission, comprising 10 stables. The site has temporary permission for 3 pitches

This site (UP2) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

## Policy GTSXX: Laburnham Stables

Laburnham Stables (UP2) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary,
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- No commercial activity will be allowed other than the use of the site as stables [or for agricultural purposes]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

## Ashlea View (UP3)

This site is situated on Tomkyns Lane in Upminster. Tomkyns Lane has sporadic development along its length including residential properties and agricultural buildings.

The site has had a number of temporary permissions since 1998 and has been occupied by the same family throughout this time. The site has temporary permission for 3 pitches.

Residential accommodation is situated at the end of a private road/drive off Tomkyns Lane and is set back from the road and screened by vegetation.

This site (UP3) is allocated for 3 pitches.

The site is privately owned and occupied and will be privately managed by the current owner.

## Policy GTSXX: Ashlea View

Ashlea View (UP3) is allocated for 3 pitches. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Residential accommodation should only be located in the present location in order to retain the openness of the site
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

## Willoughby Drive (WD1)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site lies at the eastern end of the three and is currently an unauthorised site with 1 pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD1) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD1) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Willoughby Drive (WD3)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site is the middle of the three and has temporary permission for one pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD3) is allocated for 1 pitch.

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD3) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

#### Willoughby Drive (WD4)

This is one of three gypsy and traveller sites adjacent to each other on the northern side of Willoughby Drive. This site lies at the western end of the three and has temporary permission for one pitch.

The sites are surrounded by a mixture of uses. To the west, on the corner of York Road, is a waste transfer station. There are a number of storage yards on the southern side of Willoughby Drive together with open land for horse grazing fronting onto Dagenham Road. To the east of the site is a small residential enclave of six terraced houses. Immediately to the north is the Bretons Outdoor Centre.

This site (WD4) is allocated for 1 pitch:

The site is privately owned and occupied and will be privately managed by the current owner.

Policy GTSXX: Willoughby Drive

Willoughby Drive (WD4) is allocated for 1 pitch. Proposals for development will be required to provide the following:

- Suitable site design;
- Satisfactory means of access, ensuring the needs of vehicles, pedestrians and cyclists are considered;
- Off site highway improvements where necessary;
- An appropriate landscaping scheme; and
- Appropriate methods of foul and surface water drainage.
- Removal of ancillary equipment and structures not utilised / part of the residential accommodation. [We will allow a static trailer, touring caravan, amenity building and parking and turning space]
- Safeguard amenity
- Appropriate materials for the means of enclosure and surfacing

# 6. Monitoring

- 6.1 All of the Council's adopted planning policies are monitored thorough the Annual Monitoring Report (AMR) the purpose of which is to assess and review the extent to which the policies in Local Development Documents are being implemented. Provision of Gypsy and Traveller pitches is monitored under Core Policy CP2 (Sustainable Communities):
  - Net additional pitches granted planning permission
- 6.2 One of the key objectives of the Gypsy and Traveller Sites DPD is to reduce the level of unauthorised development within the Borough. Therefore to ensure that the achievement of all objectives is monitored an additional indicator will be added to the annual monitoring framework:
  - Number and size of unauthorised developments

### **Monitoring indicators**

| GT1 | Net additional pitches granted planning permission |
|-----|--|
| GT2 | Number and size of unauthorised developments       |

# **Appendices**

# **Appendix 1: Site Maps**

# **Church Road (including Mariecot Bungalow)**

7 sites and 12 pitches (6 x 1 pitch and 1 x 6 pitches)

#### **Benskins Lane**

6 sites and 12 pitches (6 x 2 pitches)

# **Hogbar Farm West**

1 site (3 pitches)

# **Hogbar Farm**

1 site (8 pitches)

### Fairhill Rise

1 site (3 pitches)

# Vinegar Hill

1 site (13 pitches)

# Land between 66-72 Lower Bedfords Road (Roseview Cottage)

1 site (1 pitch)

# **Tyas Stud Farm**

1 site (1 pitch)

### **Laburnham Stables**

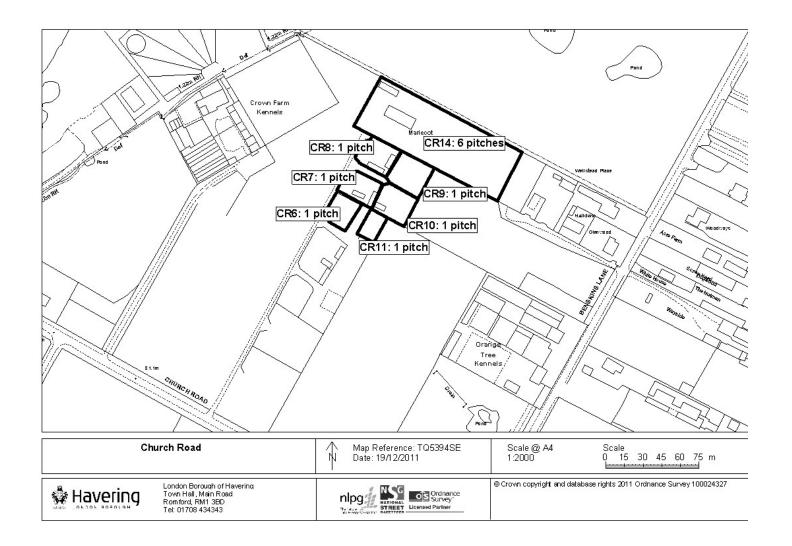
1 site (3 pitches)

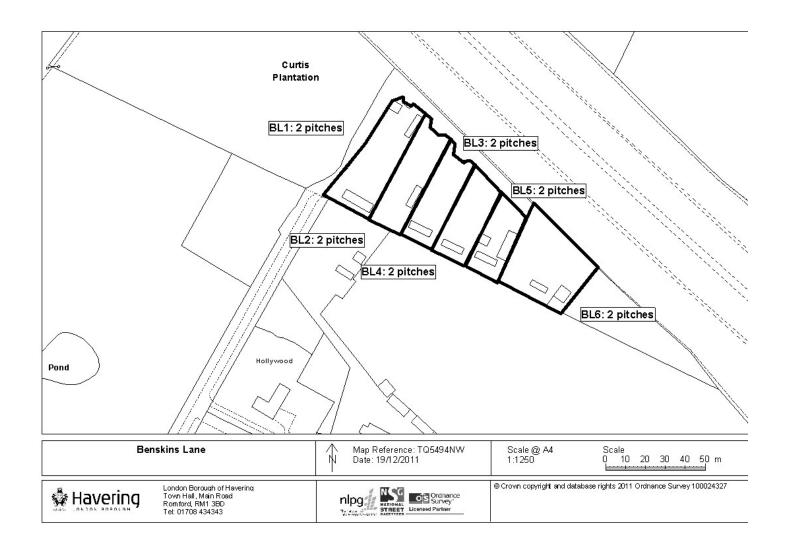
## **Ashlea View**

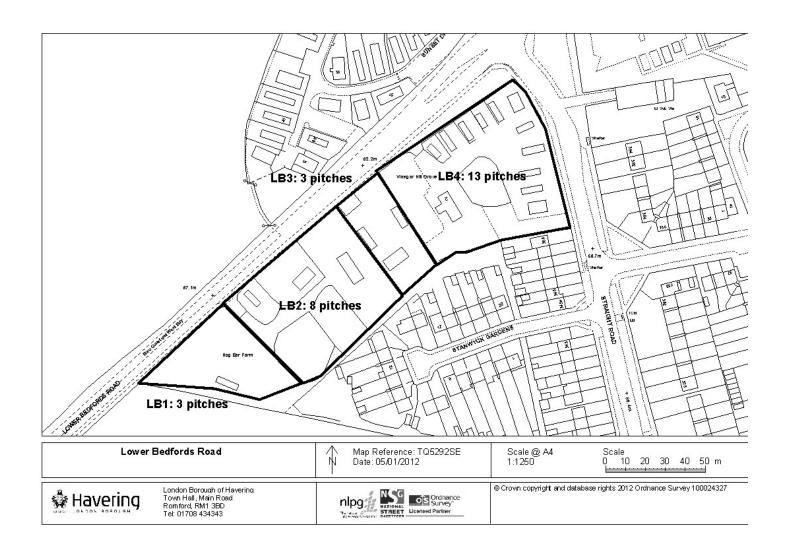
1 site (3 pitches)

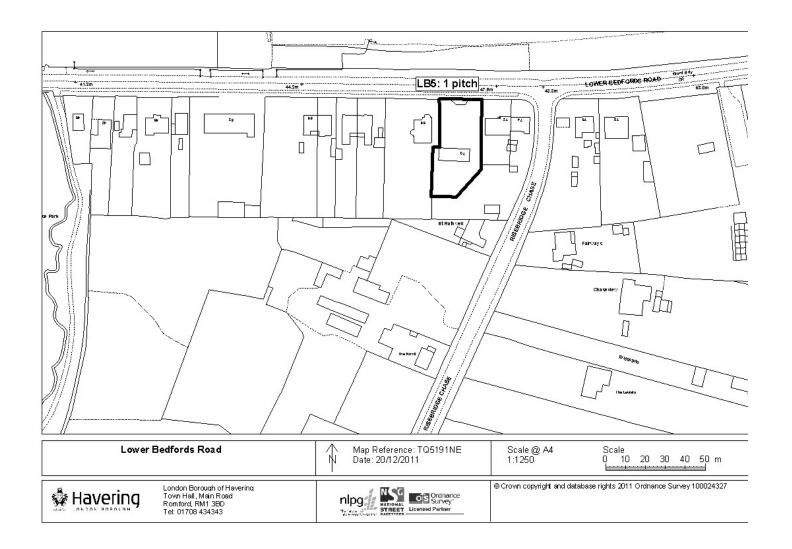
# Willoughby Road

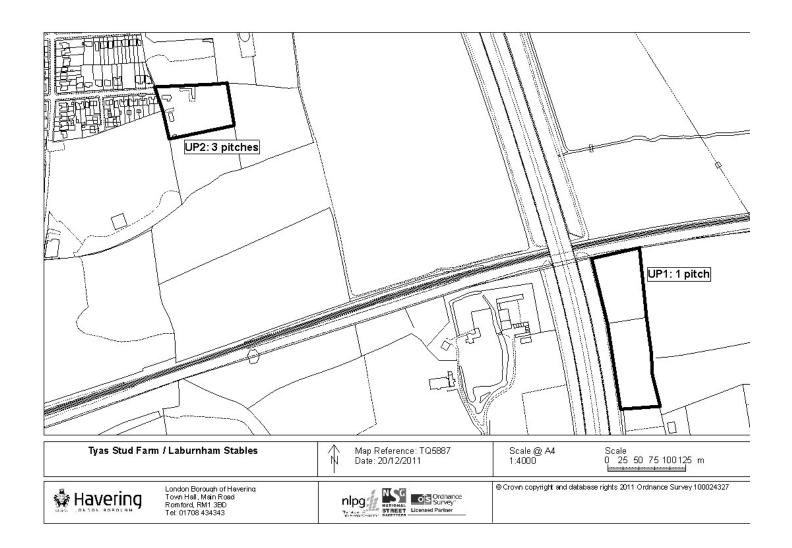
3 sites and 3 pitches

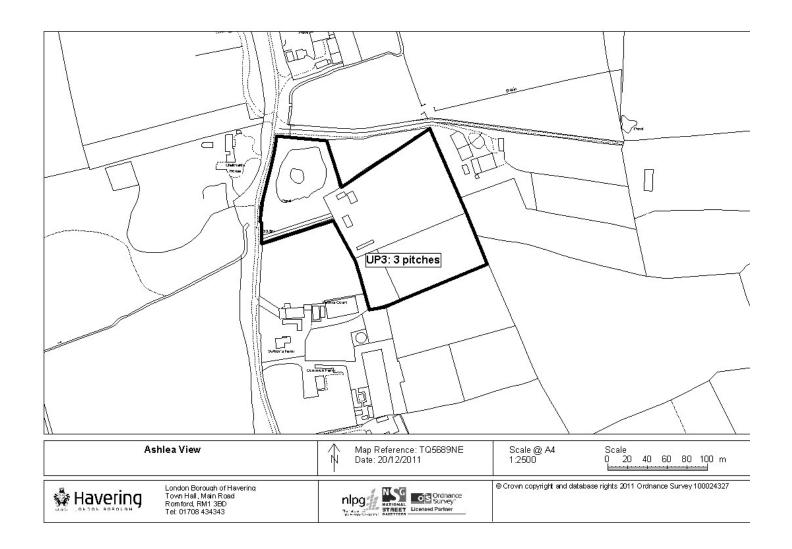


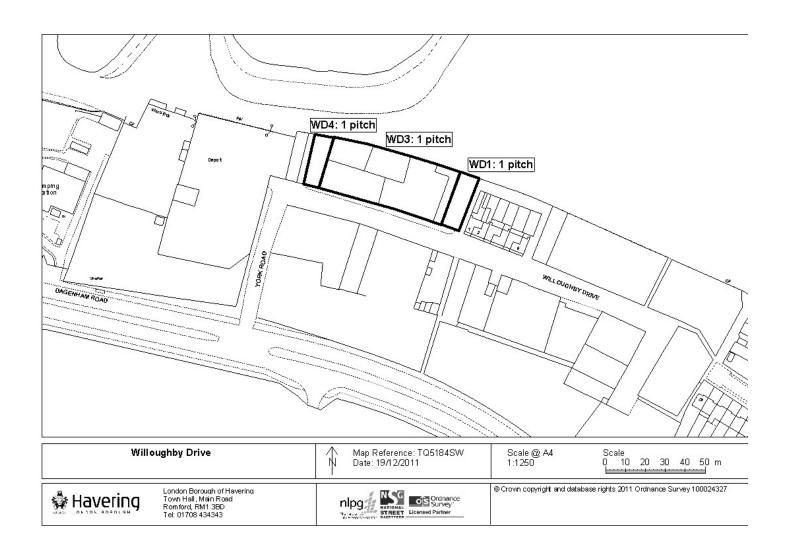












## **Appendix 2: References and Further Guidance**

Housing Act 2004, Sections 225 and 226

Equality Act 2010

Planning Policy Statement 1: Delivering Sustainable Development (ODPM 2005)

Planning Policy Guidance 2: Green Belts (ODPM 1995, amended 2001)

Planning Policy Statement 3: Housing (CLG 2010)

Planning Policy Statement 5: Planning for the Historic Environment (CLG 2010)

Planning Policy Statement 9: Biodiversity and Geological Conservation (ODPM 2005)

Planning Policy Statement 23: Planning and Pollution Control (ODPM 2004)

Planning Policy Statement 25: Development and Flood Risk (CLG 2010)

Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites (ODPM 2006)

Draft National Planning Policy Framework (CLG 2011)

Planning for traveller sites: Consultation draft (CLG 2011)

European Water Framework Directive (Directive 2000/60/EC)

Designing Gypsy and Traveller Sites: Good Practice Guide (CLG 2008)

Manual for Streets (Department for Transport 2007)

The London Plan: Spatial Development Strategy for Greater London (GLA 2011)

LBH Core Strategy and Development Control Policies DPD (LBH 2008)

London Borough of Havering Traveller Needs Assessment: Stage 1 (Niner 2004)

London Borough of Havering Traveller Needs Assessment: Stage 2 (Niner 2005)