

North Hertfordshire District Council's response to the EERA Single Issue Review Consultation – Planning for Gypsy and Traveller accommodation in the East of England.

1. NHDC **supports**, in Proposed Draft Policy H4, the broad principle of promoting pitch provision as part of new major developments and through the preparation of Local Development Documents. It specifically supports the following wording in Proposed Draft Policy H4, namely: "Local authorities should seek to achieve levels of provision required by 2011 as soon as possible through the development control process particularly when opportunities present themselves in respect of new major developments.....". Notwithstanding points made below, this wording makes sound sense in growth areas where planned development can be successfully integrated into a new community that will be developed together.
2. NHDC **supports** the aspect of Proposed Draft Policy H4 that advocates the use of evidence from up to date Gypsy and Traveller Accommodation Assessments (GTAAs) for provision beyond 2011.
3. NHDC **objects** to the use of an annual 3% increase in the level of overall pitch provision beyond 2011. This has been selected on what would appear to be an arbitrary basis. Needs for the provision of pitches beyond 2011 should be based on needs related evidence included in up to date GTAAs.
4. NHDC **objects** to the removal of the following words from the existing RSS Policy H4 which is proposed for deletion, namely: "Local authorities should make provision for sites/pitches to meet the identified needs of Gypsies and Travellers **living in or resorting to their area**". This wording is considered essential to the success of future site provision, as in recent years, many sites located in areas where Gypsy families did not want to be, have closed in different parts of the country. The wording of current RSS Policy H4, quoted above, should be retained in the Proposed Draft Policy H4.
5. NHDC **objects** to the level of provision in North Herts, as this is contrary to evidence in EERA's own report, where the need has been identified as (a maximum of) 3 additional pitches in the District but, bizarrely, the allocation is 500% higher - at 15 pitches. This conflicts with the sensible and logical direction of the original wording of RSS Policy H4 (quoted in 4. above).
6. NHDC **objects** to the figure of 15 additional pitches required, 2006-2011, for North Herts. The number of additional pitches should match the identified need in the district (based on EERA's own assessment) and therefore should be reduced to 3, with the Proposed Pitches at 2011 being amended to 9.
7. In paragraph 5.15 of the Single Issue Review, it states that "Policy H4 seeks to meet the pressing needs of additional provision of residential pitches for Gypsy and Traveller Caravans that are evident in the East of England". While this is understandable, it must be made in the areas where Gypsies and Travellers wish to live, as this would then accord with ... "The level of provision to be made **reflects the needs of those currently resident in the East of England.....**" The needs referred to here includes the need to be in a certain locality, and certainly not in areas where Gypsies and Travellers do not resort to or have any wish to reside in.

8. It seems a rather patronising and inequitable stance for EERA to propose a policy that does not attempt to satisfy the genuine 'local needs' of Gypsies and Travellers. In the settled community, the objective is that people in need of affordable housing have their needs met locally, near where they are currently living or employment areas. Departing from this local need satisfaction for Gypsy and Traveller accommodation, by arbitrarily manipulating the provision away from where the need has been identified by EERA, does not seem to be in the interests of the Gypsy and Traveller community.

9. In paragraph 5.17 of the Single Issue Review, it states that "...Such policies should ensure that there is reasonable scope for identification of sufficient sites to be delivering the level of pitches identified in Policy H4 **'in locations which are likely to be attractive to the local Gypsy and Traveller community'**..... This is of paramount importance to the satisfaction of the needs of the Gypsies and Travellers and to avoid unnecessary expenditure on site identification and provision which may prove to be ill-conceived with sites being unused because they have been located in areas where the Gypsy and Traveller community do not wish to live.

10. The approach to distribution of pitches across the region in Proposed Draft Policy H4 is flawed as it is not an exercise in satisfying the local needs of Gypsies and Travellers based on robust evidence or a true spatial strategy, but is quite simply a numerical distribution approach. To make this worse this flaw is perpetuated by the 3% per annum growth figure.

11. Bearing in mind the comments from the Gypsy Council in relation to "some 40 sites in different parts of the country that have closed simply because they have been located in parts of the country where the Gypsy families for whom they were provided did not want to be" the arbitrary strategy now being adopted by EERA, without a sound evidence base to support why the provision of pitches should be made in areas "where previously little provision has been made" (paragraph 5.16 of the Single Issue Review), defies sound logic.

12. In the absence of GTAAs in the region beyond 2011, arbitrary growth rates of 3% should not be used to extrapolate pitch rates beyond 2011, as this would exacerbate the well founded concerns relating to the robustness of district level figures and whether the short term spatial strategy for the period was still correct for the longer term. In these circumstances, the correct approach is considered to be the provision of pitch figures to 2011 with a commitment to then carry out a new round of GTAAs looking forward in a consistent and co-ordinated basis across the region.